

CITY OF DAYTON
TMDL IMPLEMENTATION PLAN
August 2022



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Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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ACRONYMS

BMPs	Best Management Practices
City	City of Dayton
CESCL	Certified Erosion and Sediment Control Lead
CS	Construction Site Runoff
CWA	Clean Water Act
DEQ	(Oregon) Department of Environmental Quality
DMA	Designated Management Agency
ESCP	Erosion and Sediment Control Plan
EPA	United States Environmental Protection Agency
GH	Good Housekeeping in Municipal Operations
IDDE	Illicit Discharge Detection and Elimination
LID	Low Impact Development
LUCS	Land Use Compatibility Statement
MCM	Minimum Control Measure (aka Stormwater Controls)
NPDES	National Pollutant Discharge Elimination System
NPS	Nonpoint Sources (not under an NPDES permit)
NWI	National Wetland Inventory
OAR	Oregon Administrative Rules
ODA	Oregon Department of Agriculture
ODFW	Oregon Department of Fish and Wildlife
PC	Post-Construction Runoff Control in New and Re-development
PE	Public Education
PI	Public Involvement
SWPPP	Stormwater Pollution Prevention Plan

TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids
USGS	United States Geological Survey
WQMP	Water Quality Management Plan

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The City of Dayton is submitting this TMDL Implementation Plan in response to the **2019 Final Revised Willamette Basin Mercury TMDL and WQMP**

Load Allocation The load allocation for Dayton, a non-permitted DMA calls for a 75% reduction of mercury as applied to all DMAs within the Willamette Basin. The City anticipates that full implementation of the management strategies listed in this plan will meet the requirements set forth by DEQ.

SECTION 1 INTRODUCTION

Section 1.1 Background

A Willamette Basin Mercury TMDL was first issued in 2006. On November 22, 2019 DEQ issued the *Final Revised Willamette Basin Mercury Total Maximum Daily Load* (TMDL) and Water Quality Management WQMP). The final TMDL and Water Quality Management Plan (WQMP) states mercury reductions which can be achieved through planned implementation of permits, best management practices, conservation practices, and other management strategies help reduce mercury entering waterways. The ultimate goal of this process is to provide full restoration of the beneficial use of fish consumption, including protection of aquatic species and wildlife throughout the Willamette Basin.

According to DEQ the goals, objectives and approaches of this TMDL are consistent with the requirements of the federal Clean Water Act (CWA) and Oregon water quality laws and implementing regulations.

In March 2021, City of Dayton was notified that DEQ had included Dayton as a designated management (DMA) agency in the 2019 Willamette Basin Mercury TMDL and WQMP. According to Oregon Administrative Rules (OAR 340-042-0030(2) *DMA means a federal, state or local governmental agency that has legal authority over a sector or source contributing pollutants, and is identified as such by the Department of Environmental Quality in a TMDL.* DMAs are responsible for implementing strategies and DMA specific TMDL Implementation Plans.

Section 1.2 Summary of TMDL Plan Development

The TMDL Implementation Plan was developed to meet the conditions of the WQMP and the requirements listed in Table 13.11 of that document. Timelines are consistent with Table 13.14. The TMDL Implementation Plan includes a narrative which is captured in Sections 1 through 4 of this document, and an 'at-a-glance' matrix in Appendix A.

The City chose to use a consultant to develop the plan based on factors such as a small staff with limited knowledge of the program and environmental conditions. The consultant was hired in April 2021 shortly after receiving DMA notice from DEQ.

Initial steps for plan development focused on formation of the BMPs to be used by the City as a new TMDL DMA. Emphasis has been placed on foundation building activities and training to allow staff to review existing water quality based actions that could be expanded upon. The consultant has provided basic program training to staff with additional training to the City Manager and Public Works Director.

Section 1.3 The City of Dayton

According to the 2020 census, Dayton's population is 2745. The City incorporated on 10/15/1880. Dayton lies just east of the City of McMinnville at the junction of Oregon State Highways 18 and 22. The Administration includes a Mayor, 6 City Council members, and a City Manager.



The City includes a cluster of businesses located around a central park in the heart of the City. The remainder of the City is primarily residential with very little industry.

The City hosts and promotes a number of community activities and events during the year which often revolve around holidays or seasons. These events are well attended and supported.

Section 2 Hydrological Conditions / Existing Conditions

Section 2.1 Yamhill Subbasin / Palmer Creek / Local Waterways

The Yamhill Subbasin (Hydrologic Unit Code 17090008) is located in the Western portion of the Willamette Basin and drains portions of the Coast Range. The Yamhill River flows into the Willamette River to the east of Dayton. The Subbasin's 772 square miles (493,762 acres) include the following eight watersheds: • Willamina Creek Watershed • Agency Creek-South Yamhill River Watershed • Mill Creek Watershed • Deep Creek-South Yamhill River Watershed • Salt Creek Watershed • North Yamhill River Watershed • and the Yamhill River Watershed. The subbasin is within portions of Yamhill and Polk counties, and includes the Cities of Amity, Carlton, Dayton, Lafayette, McMinnville, Sheridan, Willamina, and Yamhill. The subbasin is primarily owned by private landowners, however federal and state ownership accounts for 14% of the total land use in the subbasin. There are scattered landholdings by the U.S. Forest Service and Bureau of Land Management. The subbasin consists of forestry, agriculture and urban land uses

The Yamhill River flows from the west into the City of Dayton and exits to the east. The confluence of Palmer Creek and the Willamette is at Yamhill River mile 4.2. That portion of the Yamhill that travels through Dayton has very limited access for residents. The City's wastewater discharge is to the Yamhill.

The primary tributary to the Yamhill River in Dayton is Palmer Creek. Palmer Creek is a well developed drainage that is heavily vegetated. The drainage basin is very incised for the most part, and homes are located well away from the top of bank.

Other smaller drainages within the City include the West Fork of Palmer Creek and Lippencott Gulch which is dry most years.

Fish – According to members of the Greater Yamhill Watershed Council, observations of Pacific Lamprey have been noted in Palmer Creek. Other species using Dayton creeks and the Yamhill River include Coho salmon, winter steelhead, and Western Brook Lamprey. Warm water species include species such as bass, sunfish, and crappie.

Section 2.2 City Services

Stormwater – The stormwater system in Dayton is rudimentary and is composed primarily of limited mainlines and a system of shallow open roadside ditches; many that don't function. The stormwater system is maintained by Public Works staff. The system was mapped by the contracted engineering firm from Salem, Oregon in 2006, which involved pulling information from old water maps, developer plans, and other assorted sources. The map has been updated routinely by Westech Engineering when new information was available. The City is now working from a map updated on 4/29/2022.

Wastewater – The City of Dayton has a lagoon system which includes primary ponds and polishing ponds. Wastewater is treated with chlorine and de-chlorinated prior to discharge to the Yamhill. Discharge is permitted through the City's NPDES permit #101742 and occurs between November 1 and April 30 on an annual basis.

Water – Dayton's drinking water source is primarily groundwater. The City manages its water treatment and distribution system and adheres to regulatory requirements administered by DEQ.

Section 2.3 Existing Conditions and Pollutant Sources

Pollutant sources coming from Dayton are similar to those in other northwestern Oregon municipalities of their size. The City has a downtown core, residential areas, a central park, and a limited industrial activity. The potential for significant growth within Dayton is likely within the next 5 years given existing conditions in Yamhill County which is now utilized by new residents who commute or work from home.

The City is surrounded by large parcels of land that are linked specifically to agricultural uses. It is also transected by 2 state highways. This land use provides the potential for a pollutant sources from automobile use, heavy farm equipment, and agricultural chemicals.

The City of Dayton would like to make note that according to the WQMP, the Oregon Department of Agriculture (ODA) is DMA under OAR 340-042-080(3). The Agricultural Water Quality Management Act (ORS 568.900 to 933), and ORS 561.191, give ODA the responsibility to adopt and enforce rules that protect water quality on agricultural lands." DEQ works directly with ODA for implementation of these

rules. Dayton recognizes that pollutants coming from agricultural sources may need some sort of correction that would be driven by the ODA and DEQ.

Section 3.0 Mercury Reductions / Plan Discussion

Section 3.1 General Approach for Mercury Reduction

The City of Dayton will put the majority of its efforts for this permit term for mercury reduction into public education and preparing for the development that is occurring in other communities in Yamhill County. Dayton routinely hold a number of seasonal community activities. These events are well attended and provide an excellent opportunity for outreach to the public. As is the case with many small towns in Oregon, Dayton residents are a tight-knit group.

Staff has developed the following list of target audiences. These target audiences will have messages and activities designed that pertain specifically to that group through key messages. While certain audiences like the general public can receive a wide variety of messages through various means (brochures, articles, social media, etc.), if the target audience is school children for example, messages should be designed in a way that is useful for that group. Field trips or field presentations covering the impacts of mercury might be much more interesting for students.

Target Audiences

General Public

Students / School Children

Businesses

Industries

Landscapers

Developers/Builders/Engineers

Elected Officials / City Staff

The City will complete messages in 2022/2023 that can be used for each of the target audiences over the 5 year term and beyond. Records will be maintained in order to make certain all audiences are being reached and what factors indicate success or poor performance to fine-tune efforts over the permit term. It is expected that Dayton will continue to focus on Public Education as a core control measure. The City recognizes that activities presented to an educated public will provide for long term success.



City Manager and Public Works Director at annual tree lighting 12/22

Erosion control is another area of emphasis in this strategy. The BMPs listed in matrix indicate that Dayton intends to move forward during the first implementation term in regard to proper management of disturbed soils to the maximum extent practicable given existing conditions.

Section 3.2 Assessment of Stormwater Measures (Table 13.11)

According to the WQMP, DEQ expects these DMAs [cities with less than 5,000 people] to evaluate the six minimum stormwater control measures and identify the strategies and actions in TMDL implementation plans that they can implement to reduce mercury and sediment. Cities with less than 5,000 people must also provide information to DEQ about specific limitations to implementing strategies that the city does not include in its implementation plan.

An assessment for the stormwater measures follows:

The City does not have a stormwater utility and does not have a stormwater fee in place. With only 5 Public Works employees, including the Public Works Director, responsible for operating and managing Dayton's streets, stormwater, wastewater, drinking water, and parks. There is an obvious lack of staffing to fully implement, and especially enforce, the BMPs listed for several of the control measures. Currently all Public Works employees respond to infrastructure needs regardless of funding allocations. The Streets Fund allocates only .58% of a position to stormwater.

The lack of funding for the program will need to be evaluated and amended in subsequent years.

Public Education – This control measure will be fully implemented according to the BMPs listed in the matrix, Appendix A, and as discussed in Section 3.1

Public Participation and Involvement – This control measure will be fully implemented. The BMPs are listed in Appendix A

Illicit Discharge Detection and Elimination – Illicit discharge requires a full identification and response program, and the legal means to enforce on violators. Limited staffing prohibits the rapid response that full implementation requires as well. Dayton will utilize the consultant for training in report year 1 so that staff fully understands the control measure. Dayton will also develop and publicize a way for citizens to report discharges. Staff will respond and provide clean-up or abatement when possible. This control measure will be partially implemented within the 5 years

Construction Site Runoff Control - This control measure will be partially implemented within the 5 years. Limited staffing prohibits the full implementation of this control measure. Until the program is fully developed, staff will focus on educational efforts directed at builders and developers. Staff will also familiarize themselves with the conditions of the 1200-C program in order to communicate accurate information and communicate efficiently with DEQ for state held permits. In addition, a resource guide will be developed for staff to use in the field and when reviewing plans..

Post-Construction Runoff Control - This control measure will be partially implemented within the 5 years. The consultant will provide training for staff on this control measure and the City’s consulting engineer will be able to determine what needs to be done to amend design standards.

Good Housekeeping – This control measure will be fully implemented within the first 5 years of program implementation

Section 3.3 BMP Discussion

Management strategies for the implementation plan are directed toward the six control measures listed in Table 13.11 of the WQMP. A list of Dayton’s BMPs are included in the following table

Table 3.3 BMP List

BMP	Description
PE-1	Develop a resource portfolio of outreach messages for the identified target audiences.
PE-2	Maintain a website to post the most current TMDL information
PE-3	Provide educational opportunities and material to students
PE-4	Print brochures for City Hall and Library
PE-5	Use local festival and events to promote water quality minded activities
PE-6	Maintain and stock pet waste stations (voluntary activity)
PI-1	Maintain a website to post the most current environmental educational information
PI-2	Annual presentation to City Council
PI-3	Utilize community groups to mark catch basins and include an educational element
ID-1	Develop a map of the stormwater conveyance system
ID-2	Develop a mechanism to take citizen reports and respond
ID-3	Develop, implement, and enforce a program to detect and eliminate illegal discharges into the stormwater system
ID-4	Evaluate prohibited and allowed discharges to determine what applies to Dayton

ID-5	Develop and enforcement response plan (see CS and PC)
ID-6	Annual employee training
CS-1	Familiarize key staff with the 1200-C program. Provide notice to developers when a 1200-C permit is needed and notice DEQ
CS-2	Develop a guidance manual and resource guide
CS-3	Develop a city erosion control management program including regulatory ordinance
CS-4	Develop an enforcement (see ID and PC) response plan
CS-5	Recordkeeping
CS-6	Staff training
PC-1	Update design standards to require onsite management of stormwater consistent with DEQ requirements
PC-2	Develop and implement a long term maintenance program for Post Construction facilities
PC-3	Staff training
PC-4	Ditch rehabilitation. Rehabilitate selected sections of ditch to infiltrate stormwater using vegetation and suitable planting material
GH-1	Develop a Good Housekeeping Manual
GH-2	Develop or continue to implement a street sweeping program
GH-3	Develop a catchbasin cleaning program and implement
GH-4	Reach an agreement with Yamhill County about management of Boat Ramp
	Develop a sustainable stormwater fee
	Develop a Stormwater Management Plan (SWMP)
	Complete annual reports
	Evaluate public education activities according to WQMP
	Annually evaluate implementation efforts and program progress (monitoring)
	Complete 5 th Year Assessment and Evaluation

The BMPs Dayton has chosen are directed toward program regulations. In regard to PC-4, a significant portion of the City’s stormwater system is roadside ditches. Some function and some do not. Staff will select suitable sections of ditch to establish roadside vegetated facilities that will capture and treat stormwater. This activity will introduce post-construction activities while also developing an inventory of these features within the City.

BMP GH-4 addresses a Yamhill County Boat Ramp that is located on the City’s property. The boat ramp and associated parking area and landscaping are maintained by Yamhill County. Dayton will work with Yamhill County to ensure that the facility is maintained in a water quality minded method consistent with the TMDL program.

Section 3.4 Public Involvement

In order to meet the intent of the public involvement control measure, a program overview was provided to the City Council on 6/21/21. With the local TMDL Plan completed, a second presentation is planned for City Council on 10/17/22.

In addition to keeping the City Council educated, staff also intends to conduct catch basin marking in the downtown core. Finally, the plan and all regulatory information will be posted to the website for review and comment by residents.

Section 3.5 Land Use Compliance

Upon review of the City of Dayton's Land Use and Development Code, staff finds that the plan complies with the following sections:

- 7.2.304- Storm Drainage
- 7.2.113.07- Flood Protection Standards
- 7.2.114- Restricted Development Overlay Standards

Additionally, staff finds that the proposed implementation plan complies with the applicable goals and policies of the City of Dayton Comprehensive Plan, and therefore the applicable statewide Planning Goals; specifically Goal 5 (Natural Resources, Scenic and Historic Areas, and Open Spaces), Goal 6 (Air, Water, and Land Resources Quality), and Goal 7 (Areas subject to natural hazards). Staff finds that the implementation plan has been undertaken in compliance with DEQ's local government TMDL guidelines. The applicable comprehensive plan sections, goals, and policies are listed below:

Chapter 2- The Physical Setting

- 2.4 Water Quality
- 2.6 Land Quality
- 2.7 Physical Setting Goals and Policies

- o Policy 1: "When in the best interest of the community, the City shall support the State and Federal agencies' efforts to maintain and improve air, water and land quality resources at the community level."

Chapter 3- Natural, Scenic, and Historic Resources

- 3.6 Water Resources
- 3.9 Natural, Scenic, and Historic Resources Goals and Policies
- o Policy 11: "The City shall investigate and promote the conservation and development of water resources to ensure that an adequate future water supply will be available to Dayton's citizens at a reasonable cost."

Chapter 4- Natural Hazards

- 4.2 Soil Hazards
- 4.5 Natural Hazards Goals and Policies

The City of Dayton Comprehensive Plan has been adopted by the State of Oregon Department of Land Conservation and Development via the PAPA (Post Acknowledgement Plan Amendment) process. Any future comprehensive plan or development code amendments resulting from the Mercury TMDL Plan implementation shall be processed through the City's Type IV amendment process and shall comply with all local and state rules, regulations, and processes.

Section 3.6 Fiscal Analysis

The City of Dayton does not have a stormwater utility. Although the City budgets for water, sewer, streets, and parks it does not have a stormwater fund. Public Works personnel work in all areas of City operations activities. For small cities, streets personnel would likely be assigned to stormwater activities. If that were the case in Dayton, only .58% of a single position is allocated toward streets or stormwater. The City's 2022/2023 can be accessed at [22-23 Adopted Budget.pdf \(dayton.or.us\)](#).

The City recognizes that a solution needs to be agreed upon for sustainable funding for the program and will enter into those discussions as part of program implementation. Dayton understands its obligations toward implementation of the program and although DEQ states there is more flexibility for cities with populations < 5,000, staff is aware of the time it will take to secure funding. This will be a priority for the City in subsequent years.

Section 4 Implementation Plan Management

Section 4.1 Annual Reporting

Dayton will submit yearly reports documenting the progress of the TMDL program for the year. During the 5th year of the implementation period, the City of Dayton will submit a program evaluation and assessment according to guidance provided by DEQ. This portion of the annual progress report will also include the public education evaluation and assessment required in the WQMP as listed in Table 13-11.

The five-year evaluation shall be submitted every 5th year with a deadline to be determined by DEQ.

The City of Dayton requests that their report year start on November 1st of each year and end October 31st. Yearly reports will be completed and submitted on December 1st of each year with Report 1 being submitted on December 1, 2023.

Section 4.2 Plan Monitoring/Performance Monitoring

The City of Dayton will annually review its TMDL plan and BMPs to determine if the plan is functioning as designed and if Adaptive Management needs to be applied. The annual review will include, but is not limited to a review of BMPs and records kept throughout the report year. An assessment will be developed and submitted to DEQ each year with the annual report.

Section 4.3 Matrix

The matrix included with this implementation plan includes mercury source, strategy, and timeline for meeting the strategy. The matrix is based on the control measures listed in Table 13.11 of the WQMP but are in the order listed in permitted agencies.

- 1 – Public Education
- 2 – Public Involvement and Participation
- 3 – Illicit Discharge Detection and Elimination
- 4 – Construction Site Runoff Control
- 5 – Post Construction Runoff Control in new and Re-development
- 6 – Good Housekeeping in Municipal Operations

The matrix will be used as the primary tool for the annual report with program progress listed in the status column. Adaptive Management strategies will be noted in the matrix.

<p style="text-align: center;">City of Dayton TMDL IMPLEMENTATION PLAN MATRIX 2022 – 2027 Report Year 1 Sept 3, 2022 – Oct 31, 2023</p>								
<p>POLLUTANT: Mercury</p>								
<p>MCM #1 Public Outreach</p>								
BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when to know what progress is being made?</i>	Status
PE-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop a portfolio of educational messages	To be used over the 5 yr term for website, social media, etc	Included in budget for consulting services	Complete the BMP and keep material used. Report to DEQ	2021/2023	Complete the portfolio	Underway
PE-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Maintain a website to post the most current TMDL information	Utilize materials developed for the portfolio	Minimal fiscal impact	Maintain a list of what was used on the website and report to DEQ	Occurs each year starting in 2022/23	Keep material posted to the website throughout the implementation term	
PE-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Provide educational opportunities and material to students	Classroom or field presentations	Small fund for promotional items or fees	Number of students, speaker, topic and dates reported to DEQ annually	Occurs each year starting in 2024/2025	Contact teachers and speakers. Develop a list to be used on an ongoing basis	
PE-4	Runoff from soil disturbance and direct discharge to waterway from riparian area	Print brochures for City Hall and Library, and outreach events	Utilize material developed from education portfolio PE-2	Small cost for printing	Report on what material is used annually	Occurs each year starting in 2021/22	Restock and change messages	Brochure message being developed
PE-5	Runoff from soil disturbance and direct discharge to waterway from riparian area	Use local festival and events to promote water quality minded activities	Have a booth or station with promotional items	Small cost for promotional items	Report on outreach and education efforts to DEQ annually	Occurs each year starting in 2023/2024	Develop outreach events and promotional items	
PE-6	(Bacteria)	Maintain and stock pet waste stations (voluntary activity)	Develop a re-stocking schedule	Cost of pet waste bags in existing budget	Document activities in annual report	Occurs each year starting in 2022/2023	Continue to stock pet waste stations	<u>Ongoing – this is a voluntary activity</u>

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when to know what progress is being made?</i>	Status
MCM #2 Public Involvement								
PI-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Utilize the website to give the public an opportunity to design the TMDL Plan	Post the TMDL Plan on the City website	Minimal fiscal impact	Post the plan in 2022 and post plan reports submitted to DEQ annually	Commence in 2022	Keep the plan and annual reports on the website	TMDL Plan posted on the City's website 08/23/22
PI-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Educate City Council	Presentation	Staff time	Track dates, questions, and topics and report annually	Occurs each year starting in 2021/2023	Develop topic list to be reviewed and adjusted as needed	Presentation to council on 6/21/21. Presentation scheduled for 10/17/22
PI-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Utilize a volunteer group to install catch basin markers	Around the central park and the main portion of town	Minimal cost for medallions	Report activity in yearly progress report	2024	Track installation date and number of markers	
MCM #3 Illicit Discharge and Detection								
ID-1	Discharge to storm system and local waterways	Develop a map of the stormwater conveyance system	Consider using the COG to develop a GIS database	Establish in budget	Document annual progress	2025/2026	Determine how the work will be accomplished in 2022/2023	
ID-2	Discharge to storm system and local waterways	Develop a mechanism to take citizen reports and respond	Post a phone number on the website	Staff time	Document progress and findings from calls in each annual report	To occur each year starting in 2023/2024	Develop a process that allows for customer reporting	
ID-3	Discharge to storm system and local waterways	Develop, implement, and enforce a program to detect and eliminate illegal discharges into the stormwater system	Develop an ordinance that prohibits illegal discharges	Staff time	Document annual progress	Complete draft ordinance by 2027	1. Explore ordinances from other municipalities 2. Discuss with City Council	

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when to know what progress is being made?</i>	Status
ID-4	Discharge to storm system and local waterways	Evaluate prohibited and allowed discharges to determine what applies to Dayton	For allowed non-stormwater discharges, develop operation activities to reduce potential water quality issues	Staff time	Document annual progress	2023/2024	Evaluate activities to determine if activities need to be adjusted	
ID-5	Discharge to storm system and local waterways	Develop and enforcement response plan (see CS and PC)	Develop an integrated response plan	Staff time	Document progress in yearly report to DEQ	Complete by 2028	Develop the escalating enforcement response plan	
ID-6	Discharge to storm system and local waterways	Annual employee training	Utilize guest speakers, knowledgeable staff, etcf	No fiscal impact	Document progress to DEQ annually	To occur annually starting in 2022/2023	Consultant to conduct Year 1 training	
MCM #4 Construction Site Runoff								
CS-1	Runoff from soil disturbance and direct discharge to waterway from riparian area	Familiarize key staff with the 1200-C program. Provide notice to developers when a 1200-C permit is needed and notice DEQ	Utilize material and knowledge from other municipalities, attend regional training, etc.	Small budget for training	Document activities and progress in annual report	2024/2025	Develop a notification process in Year 1. Look at other small agencies covered under the 1200-CN	
CS-2	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop a guidance manual and resource guide	The manual is to be utilized by staff to provide erosion control basics before full program implementation	Budget for consulting services	Distribute manual and document progress to DEQ	2022/2023	Complete the manual	

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when to know what progress is being made?</i>	Status
CS-3	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop a city erosion control management program including regulatory ordinance	Develop an ordinance and program that is consistent with the 1200-CN	Staff time	Document annual progress in yearly report	Complete in 2028	Complete ordinance by 2028	
CS-4	Runoff from soil disturbance and direct discharge to waterway from riparian area	Develop an enforcement (see ID and PC) response plan	Develop an integrated response plan	Staff time	Include findings and progress in annual report	Complete no later than 2009	Develop the escalating enforcement response plan	
CS-5	Runoff from soil disturbance and direct discharge to waterway from riparian area	Recordkeeping	Utilize a database for pending, open, and closed projects	Staff time	Include findings and progress in annual report	Commence in 2022/2023	Develop the recordkeeping process and implement	
CS-6	Runoff from soil disturbance and direct discharge to waterway from riparian area	Staff training	CESCL for lead inspector and certification and annual training	Staff time	Document annual activities and provide to DEQ in annual report	Commence in 2022/2023	Document annual training including date, topic, and # of employees	Initial training for all City staff in July 2021
MCM #5 Post-Construction Runoff Control in New and Re-development								
PC-1	Runoff from soil disturbance and impervious surfaces	Update design standards to require onsite management of stormwater consistent with DEQ requirements	Use DEQ regulations to set standards. Utilize other agency material	Utilize an engineering firm	Document annual activities	Complete no later than 2031	Maintain records of activities associated with this BMP	
PC-2	Runoff from soil disturbance and impervious surfaces	Develop and implement a long term maintenance program for Post Construction facilities	Utilize other agencies resources if possible, such as CWS	Staff time	Document annual activities	Complete no later than 2030	Develop the maintenance program	

BMP#	Source <i>What source is being addressed? (ex. runoff from construction sites, riparian condition)</i>	Strategy <i>What will be done to control or reduce pollutant from source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Considerations <i>How is the BMP funded? (ex. In the 2023 budget, grant, etc.)</i>	Measure <i>How will successful implementation or completion be measured?</i>	Timing <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and by when to know what progress is being made?</i>	Status
PC-3	Runoff from soil disturbance and impervious surfaces	Staff training	Training will occur annually to enhance knowledge	Training budget	Document training dates and topics	Annual training 2023/2024	Training to commence in 2023/24	
PC-4	Apply LID in existing features	Ditch rehabilitation. Install infiltration type facilities in selected facilities	Retrofit selected portions of ditch system to encourage infiltration and treatment	Cost for supplies such as plants, soil amendments, etc	Document annual activities	2026/2027	Complete inventory and select appropriate sites.	
MCM #6 Good Housekeeping in Municipal Operations								
GH-1	Discharge from City managed activities	Develop a Good Housekeeping Manual	Review and revise the manual every 5 years	Staff time	Describe progress in yearly report	2024/2025	Complete manual	
GH-2	Discharge from City managed activities	Develop or continue to implement a street sweeping program	Develop a process and implement	This activity can be contracted	Describe process in yearly report	2024/2025	Assess options that will have the best outcome	The City purchased a street sweeper in late 2021 and is actively utilizing the equipment
GH-3	Discharge from City managed activities	Develop a catchbasin cleaning program and implement	Develop a process and implement	This activity can be contracted	Describe process in yearly report	2024/2025	The goal will be to clean 40% of catchbasins annually	The City has purchased a vactor truck/
GH-4	Discharge from City owned property	Reach an agreement with Yamhill County about management of Boat Ramp	Utilize Consultant to start the conversation	Staff time	Report outcome to DEQ	2024/2025	Develop an agreement that the area will be maintained with water quality BMPs	

Other Regulatory Requirements								
		Annual Report	Consultant to develop the first annual report	Consultant	Submit to DEQ by 2023 due date	2022/2023	Complete the plan	
		PE Assessment and Evaluation	Review outreach efforts and collected data	Consultant	Submit to DEQ by 2023 due date	2022/2023	Consultant will work with staff for this BMP	
		Program Evaluation	This is performance monitoring and will be completed through annual review of the program	Consultant	Submit to DEQ by 2023 due date	2022/2023	Consultant will work with staff for this BMP	
		5 th Year Evaluation	Follow instructions from DEQ	Staff time	Submit to DEQ by the required date	2007 or as determined by DEQ	Review and correlate all records from the 5 year term	