



June 15, 2020

Bill Meyers, Rogue Basin Coordinator
221 Stewart Avenue, Suite 201
Medford, OR 97501

Dear Bill,

Please accept this updated TMDL Implementation Plan submittal. This draft includes the 5-year planning matrix per your request.

Thank you for your ongoing support in the development and implementation of effective strategies and actions that aim to improve water quality and watershed health. Please let me know if you have any questions.

Best Regards,

A handwritten signature in black ink, appearing to read "Mike Ono".

Mike Ono, CFM

Enclosure

Cc: Matt Samitore, Parks & Public Works Director



City of Central Point TMDL Implementation Plan

June 2020—DRAFT

1.0 Introduction

The City of Central Point is subject to the Bear Creek Watershed Total Maximum Daily Load (TMDL) for Temperature and Bacteria. This plan constitutes a significant revision to the one developed by the Rogue Valley Council of Governments (RVCOG) in partnership with the Designated Management Agencies (DMAs), including Central Point, in 2009. The purpose of this revision is a new, simplified approach to TMDL implementation that establishes objectives and targeted actions that aim to overcome known barriers to improving water quality within the community. This plan identifies the water quality improvements needed within the City of Central Point to be compliant with the TMDL, provides an overview of known barriers to achieving TMDL targets, establishes overarching objectives for improving water quality and provides an explanation of the annual strategy development and implementation process.

2.0 Temperature TMDL Overview

Streams within the Bear Creek watershed have been found to be in violation of Oregon water quality standards for temperature (See Figure 1). Water temperature is a key issue to supporting salmon fisheries, an important economic industry for many Oregon workers and families. For this reason, salmon temperature needs are used as the indicator for waterway health in regards to temperature.

The TMDL establishes a budget that allocates the amount of pollution a waterbody may receive without violating the water quality standards, which is also referred to as the loading capacity. For temperature, this is determined by examining the current thermal load in comparison to the thermal load target that meets the established water quality standards.

Figure 1. Oregon Temperature Water Quality Criteria

Time Period	Beneficial Use	Water Quality Standard
May 16 – October 14	Salmon Rearing	< 64.4°F (18.0°C)

October 15 – May 15	Salmon Spawning, Egg Incubation, Fry Emergence	< 55.4°F (13°C)
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Temperature water quality impairment in the Bear Creek watershed is a result of surface water warming from solar radiation due to riparian vegetation removal and alteration, and the discharge or conveyance of waters that have been warmed. In Central Point, riparian vegetation along streams has been removed in many places to accommodate development associated with residential, public and commercial uses. Often times, new occupants of streamside property view trees as hazardous to structures, as well as a potential obstruction to floodwater, in the event the tree were to fall. This apparent conflict between residential uses in particular and riparian vegetation is an issue that has likely contributed to the loss of effective shade on Central Point streams. Planting trees in areas surrounding streams will reduce the amount of solar radiation that reaches the stream and help the City attain shade target needed for the City to meet its effective shade targets. Specific targets have been established for three of seven streams:

- Bear Creek: Increase effective shade cover by 66%.
- Jackson Creek: Increase effective shade cover by 42%.
- Griffin Creek: Increase effective shade cover by 38%.

In addition to restoring riparian vegetation along streams, the City needs to continue developing and implementing stormwater management actions with the greatest impact on temperature including illicit discharge detection and elimination, construction, post-construction and municipal pollution prevention.

3.0 Bacteria TMDL Overview

Streams within the Bear Creek watershed have been found to be in violation of Oregon water quality standards for bacteria. Bacteria contamination of waterways is an important issue for human health. Sources of fecal coliform and E. coli bacteria include feces of humans and other warm blooded animals. They enter waterways through wildlife, livestock waste, failing residential septic systems, wastewater treatment plant malfunctions, rural residential runoff and urban runoff.

Figure 2. Oregon Bacteria Water Quality Criteria
 30-day log mean of 126 E coli organisms per 100 ml based on a minimum of five samples. No single sample can exceed 406 E. coli organisms per 100 ml.

The bacteria TMDL applies to all lands with streams that drain to Bear Creek. This means that all of Central Point is subject to the bacteria TMDL. Bacteria reduction targets have been established for Jackson and Griffin Creeks:

- Jackson Creek contributes 43.8% of point and non-point sources of bacteria. The reduction target is 69%.
- Griffin Creek contributes 20.1% of point and non-point sources of bacteria. The reduction target is 73%.

It is important to note that the land area within the City of Central Point is not the sole contributor of bacteria to either of these streams; however, actions are needed to minimize contributions associated with pet waste, urban runoff, failing septic systems and illicit connections and discharges. Many of these activities overlap with the NPDES Phase II program requirements.

Bacteria reduction actions will focus on source controls that minimize and prevent pollution, as well as site design and volume reduction best management practices to maximize effectiveness. This approach is consistent with the findings presented in the “TMDL Evaluation and Benchmark Development for Bear Creek Watershed NPDES Phase II Municipal Stormwater Permit Applications” prepared by the RVCOG in 2011. While no quantitative benchmarks were established, the report provided an assessment of BMP effectiveness that found that most conventional stormwater BMPs, such as detention basins, grass swales, and manufactured devices have not demonstrated effectiveness in reducing fecal bacteria concentrations. Media filters and retention ponds are the exception. Central Point TMDL implementation strategies will overlap with the Phase II program activities and build upon knowledge of BMP effectiveness in reducing bacteria concentrations in receiving water bodies.

4.0 Central Point Environmental Services Program Overview

Central Point Environmental Services is the umbrella for the city’s environmental compliance and service programs. Currently this includes administration of the TMDL, National Pollution Discharge Elimination System Phase II program for stormwater management, National Flood Insurance Program (NFIP) and Community Rating System for floodplain management, and the urban forestry program. The objective of Environmental Services is to synergistically plan and implement programs to leverage limited resources in a manner that achieves each program’s objectives while maximizing public value in the context of the Central Point Strategic Plan.

Environmental Services administration is conducted by the Environmental Services Coordinator, which a full time position in the Public Works Department. Support staff includes ½ FTE dedicated for stormwater and floodplain management activities, as well as about ¼ FTE for urban forestry activity implementation. These positions are funded by the Public Works Internal Services – Administration Fund and the General Fund (Parks & Recreation—Urban Forestry only). Funding for program activities is generated by implementation of the user fees and system development charges. Funds for non-stormwater activities are limited and often compete with other

work priorities including maintenance of existing infrastructure and capital improvements. Without an exclusive dedicated funding source for all Environmental Services programs, it is difficult to commit to specific project actions beyond an annual planning horizon.

As with any local government program, there are challenges and barriers that must be overcome to succeed in achieving water quality targets. This plan aims to identify these as a starting point for building a more effective program. These have been divided into three categories as presented in Figure 3.

Figure 3. Categories of Challenges and Obstacles to Water Quality Improvement in Central Point	
<p style="text-align: center;">Administrative</p> <ul style="list-style-type: none"> - Program coordinator communication with other staff, divisions and departments difficult due to: high workloads, reduced staff resources, office/work environment locations. - Budget for TMDL, Floodplain Management and Urban Forestry is determined on an annual basis, as funding sources for these programs is shared by several different programs and projects. Funding is determined on an annual basis during the budget planning process. - Staff resources are limited to 1 FTE. Other staff resources are available on a limited and typically on a project/task basis. 	<p style="text-align: center;">Physical</p> <ul style="list-style-type: none"> - Channelized streams and development patterns limit opportunities for riparian restoration. - Invasive species growth dominates many riparian areas and limits opportunity for native riparian plant communities to naturally establish; raises cost and difficulty of restoration efforts. - Stormwater flows from urban areas contribute to degraded in-stream channel conditions (incision, increased turbidity, bank erosion). - Urban forest canopy is limited in many areas throughout town. This lack of shade over streets, in particular, increases warming of surface water flow over streets, parking lots, and developments.
<p style="text-align: center;">Cultural</p> <ul style="list-style-type: none"> - Community culture that does not express value toward natural resources and community involvement (based on low attendance of public meetings and staff interaction with residents). - Bacteria source control associated with pet waste is largely dependent upon proactive involvement of an informed and dedicated citizenry to prevent waste from entering the storm drains and local waterways. - Municipal administration and operations across all programs, divisions and departments needs to demonstrate what it means to be a good steward of local natural resources. It's challenging to ask the public to do this when the agency doing the asking doesn't do so already by example. 	

5.0 Management Strategies

5.1 Strategy Overview

Management strategies include identifying and implementing programs, projects and protocols that focus on improving water quality. This will rely on development of annual action plans to achieve specific objectives that achieve improvements to water quality and stream health by overcoming known challenges. This strategy aims to establish a strong municipal and community culture that understands and supports water quality improvement actions, as well as policies and programs that facilitate physical improvements that enhance water quality. A more detailed overview of the objectives is provided in Figure 4.

Figure 4. Objectives Overview		
Objective	Rationale	Example Projects, Programs and Activities
Objective #1: Promoting Cultural Awareness	Lasting improvements to water quality that result in attaining state standards for temperature and bacteria require an informed, committed citizenry to voluntarily adopt behaviors that promote water quality and watershed health. Most of Central Point’s streams are privately owned and already developed; therefore, the City is limited in its ability to improve riparian conditions through regulations and active management except during redevelopment. Investments in community outreach to promote awareness and inspire action are expected to be continuous and result in long-term benefits to water quality, fish habitat and stream health.	<ul style="list-style-type: none"> • Support Stream Smart Campaign by contributing time and funds toward web development, creekside signage, etc. • Develop and distribute messages to target audiences through websites, newsletters, brochures, classes, or other social media. • School presentations regarding water quality topics that affect temperature, bacteria and other watershed health indicators. • Participate in TMDL meetings to build partnerships and share resources. • Participation and active involvement in regional events or programs, such as Salmon Watch, Master Gardener’s Fair, Bear Creek Stewardship day, etc.

<p>Objective #2: Enhancing the Urban Canopy</p>	<p>Warm water inputs from urban stormwater contribute to stream degradation, including water quality parameters for temperature and bacteria. The urban forest canopy in Central Point is sparse in many locations throughout the City, leaving significant area for improvement. In addition to mitigating surface water runoff temperatures and the urban heat island affect, a healthy urban forest canopy can provide flow reduction benefits by intercepting, storing and evapotranspiring large quantities of rainfall. This objective addresses physical challenges associated with the urban forest and by doing so, provide a whole community approach to improving water quality.</p>	<ul style="list-style-type: none"> • Establish and implement a plan to plant trees, shrubs and ground cover along streams, streets, as well as public land. • Develop planting and maintenance guidelines, including invasive species control and eradication protocols to ensure long term health of the urban forest. • Establish a Reach-by-Reach Riparian Restoration program to provide private landowners with technical and financial assistance to restore riparian corridors. • Support the City’s Tree USA program with educational messages and participation. • Develop a City ordinance that will protect the stream riparian corridors and that will be enforceable and has civil penalties.
<p>Objective #3: Reducing Surface Water Runoff and pollution.</p>	<p>Reducing surface water runoff volume through green infrastructure design and infiltration techniques will benefit water quality by reducing pollutants from entering the storm drain system where they empty into local waterways untreated. Infiltration also provides a means of enhancing groundwater recharge, which naturally breaks down pollutants and cools water as it percolates through the soil and feeds local streams through seeps and springs.</p>	<ul style="list-style-type: none"> • Follow the Public Works Stormwater Master Plan including an evaluation of low impact development feasibility and impervious surface reduction opportunities. • Implement projects to reduce impervious surface area and enhance street tree coverage within the public right-of-way. • Implement LID/green infrastructure in development using the guidelines in the Rogue Valley Stormwater Design Manual (RVSDM). • Enforce LID/green infrastructure in accordance to the DEQ Phase 2 Post Construction Site Runoff for New Development and Redevelopment Schedule. • Support the City’s maintenance programs such as, Leaf collection, Street Sweeping, Illicit Discharge Detection and Elimination, Construction Site Runoff Control, Pet Waste Bag Stations, and Stormdrain Cleaning.

		<ul style="list-style-type: none"> • Work with other local agencies in the Storm Water Advisory Team (SWAT) to modify and improve the RVCSDM.
<p>Objective #4: Leading by Example</p>	<p>As the agency taking the lead on water quality improvement, it is vital to lead by example and demonstrate what good stream stewardship means. To do this, we need to identify activities that impact water quality and decide if current operations are beneficial to or in conflict with the TMDL. Temperature and bacteria inputs from municipal actions will decrease as a result.</p>	<ul style="list-style-type: none"> • Promote municipal operations to reduce pollution from going in to City stormdrains. • Promote an organizational culture that is aware of water quality issues and is empowered with information to be good stream stewards. • Support city programs that encourage the cleaning of City waste, such as Street sweeping, Public Pet Disposal stations, Leaf Pick-up Program, Bear Creek Stewardship Day, etc. • Maintain and promote existing City owned green infrastructures. • Update and review DEQ Phase 2 Permit for Pollution Prevention and Good Housekeeping for Municipal Operations Schedule.

5.2 Annual Action Plan Development

Annual action plan development will occur in tandem with the City’s annual budget planning, which begins in February/March and concludes prior to June 30th. The action plan itself will provide a simple, matrix that lists actions to be conducted for each of the four objectives. Supporting documentation for proposed actions will be attached to demonstrate the City’s commitment to action implementation.

Annual planning that is linked with the budget provides a mechanism to keep staff directly and indirectly involved in TMDL implementation aware of program goals, actions and performance measures. In essence the process prescribed in this plan lends itself to achieving the objectives of promoting cultural awareness and leading by example. Furthermore, the planning process is intended to involve local DEQ staff to encourage action effectiveness and facilitate a greater understanding of local values, opportunities, challenges and innovative approaches. The Central Point FY 2020 Annual Action Plan is included in Appendix A to illustrate the format and content of the annual action plans to be prepared in accordance with the Central Point TMDL Action Plan.

6.0 Land Use Compliance

Oregon Administrative Rules in Chapter 340, Division 18 require that local communities demonstrate that TMDL action plans comply with applicable statewide land use requirements. This determination is based on the consistency of the action plan with the City of Central Point's acknowledged comprehensive plan. The Central Point Comprehensive Plan was acknowledged in 1989 by the Department of Land Conservation and Development. The City is currently in the process of updating the plan elements to reflect current conditions and local values, which have evolved since the last acknowledgement.

All of the strategies outlined in this TMDL Action Plan will be reviewed to ensure consistency with the City's land use plans. The City will evaluate and maintain consistency with local and statewide land use laws in any future actions related to TMDL implementation as required under OAR 340-042-0080(3)(a)(D).

7.0 Adaptive Management, Monitoring & Reporting

7.1 Adaptive Management

The Central Point TMDL Implementation plan incorporates adaptive management by establishing an annual planning horizon directly linked to the City's budget development process. This ensures that commitments are an accurate reflection of available resource. In the event mid-year changes are needed to enhance implementation commitments or to amend them due to unforeseen changes in revenues, staffing levels or political support, a written adaptive management report will be provided to DEQ. This report will describe the need for mid-year adaptive management, as well as the revised strategy and explanation of anticipated impacts to the City's overall strategy as described in Section 5.0.

7.2 Effectiveness Monitoring

Effectiveness monitoring will rely on the existing water quality monitoring program administered by RVCOG and funding by the City of Central Point and the other TMDL DMAs. Reliance on the water quality data will help establish Central Point's contribution to improving water quality parameters in the TMDL. In addition, specific actions prescribed in annual action plans may include effectiveness monitoring provisions to quantitatively and/or qualitatively assess the impacts of the action or approach on water quality and community culture.

7.3 Annual Reports

The City will track and report on the status of implementation actions provided in the annual action plan. Annual reports will cover the fiscal year period from July 1 to June 30th and will be supplied to DEQ no later than November 1st of each year.

8.0 References

City of Central Point 2007, Central Point Forward Fair City Vision 2020: City Wide Strategic Plan. City of Central Point, Central Point, Oregon, 2007.

City of Central Point 1984, Central Point Comprehensive Plan. City of Central Point, Central Point, Oregon 1984.

DEQ 2007, Bear Creek Watershed TMDL (Background, Temperature). ODEQ, Medford, Oregon, 2007.

DEQ 2007, Bear Creek Watershed TMDL (Bacteria, Sedimentation, Review of 1992 TMDL). ODEQ, Medford, Oregon, 2007.

RVCOG, 2011, TMDL Evaluation and Benchmark Development for Bear Creek Watershed NPDES Phase II Municipal Stormwater Permit Applications. RVCOG, Central Point, Oregon, 2011.

Appendix A – 5-Year Strategy Matrix

The 5-year Strategy Matrix establishes the long term vision for addressing pollutant sources. It is important to note that this implementation plan was developed to provide a nexus between TMDL implementation actions and the annual local budget planning and approval process; therefore, specific actions identified each will be more specific and robust due to the commitment of resources by City administration and elected officials.

Ultimately, the objective of the City of Central Point plan is to take specific, measurable and consistent action every year to make progress in overcoming the specific physical, social and organizational challenges to improve the vital task of restoring water quality and watershed health.

- Temperature Matrix
- Bacteria Matrix
- Cultural Awareness Matrix

Temperature						
Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done or what will be done to reduce or control pollution from the source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Analysis <i>*Parks & Public works unless noted otherwise</i>	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Timeline <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>
1. Solar Radiation and riparian health impacted due to unprotected or inadequately protected riparian vegetation.	a. Implement current riparian buffer standards set forth in Section 17.60.090 & incentivize new land division proposals to reserve floodplains as a natural open space easement pursuant to Section 8.24.190.	i. Review site and land division proposals to ensure consistency with established regulations to protect and enhance riparian areas.	Staff Time Increased cost to developers that create new land division improvements in the floodplain.	Keep records of buffer area established and restored as applicable.	Ongoing	Annual reports and 5-year reviews will track progress including acres preserved/restored, and establish recommendations for improvement as needed. This milestone is development driven.
	b. Develop and implement a Reach by Reach Riparian Restoration Program to incentivize invasive species eradication and native species planting along confined stream corridors.	i. Use Stormwater Budget for the program and provide annual funds for implementation grants.	SW Utility fees revenue: invasive species removal; plants; streamside gardening workshop. Participants/volunteers: provide in-kind labor for invasive removal, planting & ongoing maintenance.	SW budget with annual funding.	Ongoing	Annual reports and 5 year reviews with pictures and details.
		ii. Implement the program with invasive removal and native planting.	Staff Time, Volunteer Time, SW Utility Fee revenue and grants as applicable.	SW budget with annual funding	Ongoing	Annual reports and 5 year reviews with pictures and details.

Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done or what will be done to reduce or control pollution from the source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Analysis <i>*Parks & Public works unless noted otherwise</i>	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Timeline <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>
2. Cumulative non-point source thermal loading inputs.	a. Enhance the Urban Forest	i. Plant street trees to reduce thermal loading on impervious surfaces.	Staff Time, tree cost funded by Street and Stormwater utility fees.	Keep records of trees planted for new, redevelopment and street tree infill projects.	Annually as funding is available & as new development proposals are approved.	Annual funding for street trees is a good intermediate measure for infill planting projects. New and redevelopment projects will be conditioned to meet current code requirements for street trees.
		ii. Celebrate Arbor Day annually to promote tree benefits and planting trees along stream banks.	Street utility fees and Parks general fund allocations, generally. When adjacent to streams, stormwater utility fees may be applied.	Document celebration activities, number of participants, number of trees planted and/or given away.	Annually	Celebration held each year with local participants and activities that educate and implement tree planting.
		iii. Plant trees to maintain Tree City USA standing, usually in conjunction with Arbor Day.	Staff Time, tree cost funded by Street and Stormwater utility fees	Document celebration activities, number of participants, number of trees planted and/or given away.	Annually	Celebration held each year with local participants and activities that educate and implement tree planting.
	b. Lead by Example	i. Seek opportunities to plant native trees and shrubs on public lands in partnership with the Parks Division.	General fund allocations to the Parks Division; grants as applicable.	Track opportunities identified and projects implemented.	Annually as funding is available	Implemented projects including number of trees planted and survival indicate success toward achieving urban forest canopy enhancement and anticipated reductions to runoff temperatures over time.

Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done or what will be done to reduce or control pollution from the source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Analysis <i>*Parks & Public works unless noted otherwise</i>	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Timeline <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>
	c. Reduce stormwater runoff volume.	i. Design and construct capital improvements that incorporate low impact development approaches to infiltrate and cool runoff & reduce other pollutants of concern as funds become available.	Annual funding source from PW enterprise funds: stormwater, stormwater quality, streets, as well as grant funds and private investments.	Tracking features installed for development, redevelopment and capital improvements.	Ongoing – development and project driven.	LID incorporated into CIP, development and redevelopment plans and/or conditions of approval.
		ii. Incentivize residential downspout disconnect and drainage into rain gardens to reduce runoff volume and cool runoff through exfiltration.	Outreach and marketing funded; installation and maintenance requires private investment to secure stormwater utility fee discount.	Area of impervious area disconnected from storm drainage system annually.	Annual marketing & outreach & involvement workshop. Discount application timing being explored.	Number of participants in workshops compared to number of rain gardens installed and impervious area disconnected.
		iii. Explore other project and program innovations to achieve this goal as reflected in the annual action plan submitted with the annual report.	Staff time	New approaches will be identified with success measurement specifications.	Annually, as appropriate	New approaches will be in response to new technology or innovations or to overcome challenges through adaptive management. The annual action planning approach was developed specifically to provide this level of flexibility.
	d. Develop a City ordinance that will protect the riparian corridor's next to the City streams.	i. Develop a City ordinance that will protect the stream riparian corridors will be enforceable and has civil penalties.	Staff time	New City ordinance.	2025	Draft ordinances will be done till approved by the City Council.

Bacteria						
Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done or what will be done to reduce or control pollution from the source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Analysis	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Timeline <i>When will the strategy be completed?</i>	Milestone <i>What intermediate goals will be achieved and how to know when progress is being made?</i>
1. Fecal sources from pets and wildlife.	a. Continue to provide pet waste bags for dog owners at local parks/public areas for owners to pick up after their pets.	i. Develop an inventory of parks/public areas that have pet waste disposal dispensers.	Staff Time	Track number of existing and new stations installed and bags ordered.	Ongoing	Inventory and goals established for future installations updated.
2. Urban Runoff	a. Reduce runoff volume.	i. Incorporate low impact development approaches into capital improvements, development and redevelopment projects in accordance with RVSQDM to reduce impervious areas and infiltrate runoff.	Staff Time, Project Funding through utility fees & grants as applicable.	Track the features installed, size and treatment expectations as they are installed.	Ongoing as development occurs.	This strategy is dependent on funding availability to design and construct capital improvements, as well as on private investment in new or redevelopment projects. As development occurs, features being installed and maintained will indicate success.
		ii. Incentivize residential downspout disconnection to rain gardens through utility fee discounts and hands-on education.	Staff time, SW Utility Fees, grants as applicable.	Track number of rain garden workshops held, number of participants and the associated number of downspouts disconnected including impervious area reduction, outreach efforts, discounts earned.	Workshop to be held in June 2022 with discount availability planned at local stores or nurseries..	Annual marketing, education and involvement events, technical assistance and resulting participation indicate success. At the end of the 5-year cycle, the level of program participation will be used to establish performance measures for the 3 rd Implementation Cycle.
		iii. Implement WQ CIPs identified in the City's Stormwater Master Plan as funds are available.	Staff time, SWQ fees, grant funds as applicable.	CIPs implemented over 20-year period unless revenues increase via utility fee increases or receipt of grant funding.	2025	Annual funding sources will be utilized for designing projects, banking for future project implementation and/or matching funds for grants.

Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done or what will be done to reduce or control pollution from the source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Analysis	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Timeline <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>
	b. Lead by Example	i. Maintain Stormwater Management Practices including pet waste stations, ESC controls, etc. to prevent bacteria pollution to the MEP	Staff time	Ongoing inspections and maintenance of stormwater management practices.	Ongoing	Phase II annual report. Regular inspections, employee training in proper ESC protocols, IDDE, and good housekeeping practices.
3. Illegal dumping & illicit discharge	a. Continue to implement IDDE Program and enforce illegal dumping regulations under the NPDES Phase II program	i. Monitor and respond to all calls according to the MS4 Phase 2 Permit	Funded	Phase II Compliance	Ongoing	Phase II Annual Report
	b. Continue to require erosion and sediment control at construction site as part of the NPDES Phase II program.	i. Monitor and inspect all work sites according to MS4 Phase 2 Permit.	Funded	Phase II Compliance	Ongoing	Phase II Annual Report
	c. Continue hot spot monitoring as part of IDDE monitoring program in the Phase II Permit. Refine as necessary.	i. Continue participation in the Phase II Program and funding RVCOG monitoring.	Funded	Phase II Compliance	Ongoing	Phase II Annual Report.
	d. Continue Dry outfall inspection as part of the IDDE Program.	i. Inspect and monitor outfalls for contaminants according to the MS4 Phase 2 Permit.	Funded	Phase II Compliance	Ongoing	Phase II Annual Report.
4. Report failing septic systems	a. Continue to Identify and eliminate failing on-site sewage disposal systems.	i. Notify DEQ of failing septic systems when found	Staff Time	Keep a written record of referrals.	Ongoing	Septic systems identified and eliminated.

Cultural Awareness						
Source <i>What source of this pollutant is being addressed?</i>	Strategy <i>What is being done or what will be done to reduce or control pollution from the source?</i>	How <i>Specifically, how will this be done?</i>	Fiscal Analysis	Measure <i>How will successful implementation or completion of this strategy be measured?</i>	Timeline <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>
1. Temperature & Bacteria	a. Promote Cultural Awareness	i. Publish newsletter articles in "News From City Hall" regarding relevant water quality topics. Surveys consistently show this is the most effective means of sharing information with CP residents.	Funded	Minimum of 3 articles published a year. Topic areas determined annually as presented in annual action plans.	Annually	Annual report with copies of articles.
		ii. Engage residents in experiential learning opportunities that promote awareness as well as tools for changing behavior. Example: Rain Garden Demonstration Workshop, Salmon Watch Program, etc.	Funding from SWQ utility fees determined annually.	Workshop/Program participation and measurable results as specified in the City's annual action plan (i.e. number of rain gardens installed, number of students participating in Salmon Watch, etc.)	Annually, as specified in the Annual Action Plan	Annual Action Plan and Subsequent Report
		iii. Actively participate in the Stream Smart Campaign	Staff time & funding as needed from SWQ utility fee revenue.	City's webpage on Stream Smart website updated with relevant and informative information; participation in campaign planning & implementation.	Ongoing	Annual Action Plan and Subsequent Report
		iv. Maintain City's web pages for Water Quality including stormwater and TMDL topics	Staff time	City's web pages are updated with relevant and informative information. Following new website design, statistics on page usage will become a good success indicator.	Ongoing	Annual Report summarizing changes & relevant links, if changed.
2. Sediment	Promote Cultural Awareness	i. Hand out brochures or talk to contactors on how to protect stormdrain inlets so sediment and pollutants don't get into the stormdrains and creeks.	Staff time	Track approximately how many contact we make	Ongoing	Phase II Permit report.

		ii. Hand out brochures and talk to residents about how putting grass clippings, leaves, dirt or paint into street curbs or hurts our creeks.	Staff time	Track approximately how many contact we make	Ongoing	Phase II Permit report.
3. Trash & other pollutants.	Promote Cultural Awareness through participation.	i. Continue to participate in regional events that involve the public in clean-ups and educational events.	Staff time	Total amount of trash and how many participants participated.	Twice a year.	Annual Report summarizing the event for the year.

Appendix B – Additional Documents

FY 2019-20 Central Point Annual Report matrix.

FY 2020-2022 Budget Overview – The City will provide upon request; document is 137 pages.

Stormwater Master Plan Summary - The City will provide upon request; document is 196 pages.

City of Central Point FY 2019-20 TMDL Annual Report

Duration:

July 1, 2019 through June 30, 2020

Annual Report Deadline:

November 30, 2020

Action Plan Administrator:

Mike Ono

541.664.7602, Ext. 243

Mike.ono@centralpointoregon.gov

FY 2019 Action Plan Overview:

This year's program focused on the City's new NPDES Phase 2 General Stormwater Permit. The City has obtained its own MS4 stormwater permit formally held by Rogue Valley Sewer Services and will be implementing the requirement needed to be in compliance with the permit. The city will continue to use LID practices on new development and redevelopment to help improve stormwater runoff and water quality.

Objective #1: Promoting Cultural Awareness

Promote cultural awareness of water quality problems, sources and solutions.

ACTION	DESCRIPTION	BUDGET	PERFORMANCE MEASURE(S)	DELIVERABLES	STATUS
Salmon Watch	The City sponsors a Salmon Watch program at Scenic Middle Sch. in the Fall to promote and educate the students about the Salmon life cycle and the importance of water quality in streams.	\$2,220 and staff time	How many students attend.	Summary of events and pictures.	Complete
Stream Smart Campaign	Regional DMAs, will be hiring a professional web designer to create a new Stream Smart Website to make it easier to use and better looking with new material and visual content.	\$500 RVCOG /City Stormwater contract	Easier and friendlier website that's has more information and is intended to attract more visitors.	Newly designed website.	Partially complete
Adopt a Street Program	Adopt-a-street volunteers commit to cleaning up litter on adopted streets at least four times per year.	Staff time	How many miles of City streets were cleaned by volunteers	Volunteer schedule and locations	Complete
City Newsletter Articles	City Newsletter is distributed to all CP water bill customers 6K+ residents. Articles published will address: <ul style="list-style-type: none"> • What is Stormwater • SD dumping regulations • Fertilizer Education • Pet Waste/bacteria connection and pollution prevention. 	Staff time	Publish at least 3 articles	Copy of newsletter editions with published articles.	Complete

City Stormwater Web Pages	Update and create new web material that include information about stormwater and TMDL topics. Provide information on Illicit discharges and how to report them.	Staff time	Review web pages at least once per year and update as needed.	Copy of website update tracking form and links to updated pages.	Complete
Bear Creek Stewardship Day	Twice a year the city helps with the regional clean up along Bear Creek through SOLVE.	\$702 RVCOG/ City Stormwater contract.	How many volunteers and amount trash collected.	Summary of event and pictures.	Complete

Objective #2: Enhancing the Urban Forest Canopy

Enhance the urban forest canopy in the City, especially in riparian areas, to promote cooling of stormwater and instream water as opportunities and funds are available. This includes riparian restoration projects.

ACTION	DESCRIPTION	BUDGET	PERFORMANCE MEASURE(S)	DELIVERABLES	STATUS
Street Tree Planting	The City has donated \$25,000 to help the restoration planting of the Peninger Fire along Bear Cr.	\$25,000	Planted and shrubs trees.	Before and after picture.	Complete
	The City plans to remove invasive species and replant with native and fire-resistant plants in the 8.5 acres next to the Boes Subdivision.	\$36,000	Planted and shrubs trees.	Before and after picture.	In process
Arbor Day Celebration	Promote tree planting and care as part of the CP Arbor Day Celebration and the City's Tree USA status.	\$3.5K – Parks	Number of trees planted and attendees.	Celebration details, documentation and photos.	Complete
Reach by Reach Riparian Restoration	Continue to develop the Reach by Reach Riparian Restoration program.	Staff time	Amount of land reclaimed and replanted.	Before and after picture.	Ongoing

Objective #3: Reducing Surface Water Runoff and Pollution.

Reduce surface water runoff into local waterways to reduce pollution from a wide variety of sources including but not limited to temperature and bacteria.

ACTION	DESCRIPTION	BUDGET	PERFORMANCE MEASURE(S)	DELIVERABLES	STATUS
Illicit Discharge Program	The City will be enforcing the MS4 Construction Site Runoff Control requirements for the NPDES Phase 2 Permit.	Staff time	Reduction of illicit discharges to MS4	Summary of program	Ongoing
Construction Site Runoff Control	The City will be enforcing the MS4 Construction Site Runoff Control requirements for the NPDES Phase 2 Permit. .	Staff time	Reduction of construction site pollutants and sediments.	Summary of program	Ongoing

Post-Construction Site Runoff for New and Re-Development	The City will be enforcing the MS4 Post-Construction Site Runoff requirements for the NPDES Phase 2 Permit.	Staff time	Number of projects using LID or green infrastructures.	Summary of program	Ongoing
Objective #4: Leading by Example					
Become a "Stream Smart City" by ensuring that day to day municipal operations and business is conducted in a manner that demonstrates excellence in stream stewardship.					
ACTION	DESCRIPTION	BUDGET	PERFORMANCE MEASURE(S)	DELIVERABLES	STATUS
Public Works Dept. general housekeeping procedures.	The City will be enforcing the MS4 Pollution Prevention and Good Housekeeping for Municipal Operations for the NPDES Phase 2 Permit.	Staff time	Measures taken to improve PW operations and maintenance in their daily work to keep pollutants out of the stormdrains.	Summary of program.	Ongoing
Field Operations Assessment	Continue to inventory street and storm drain operations to identify impacts on water quality, as well as barriers to implementing changes, if any.	Staff time	Assess operations for Streets and Storm Drains	Summary of findings and recommendations and any actions taken.	Ongoing
Street Sweeping	The City conducts a regular street sweeping program. All city owned streets are swept once every seven days and high volume and high intensity use areas are swept twice per week for a total of 6,289 miles	PW Budget	Amount of debris collected by the sweeper.	Landfill quantities from sweeper.	Ongoing
Public Pet Disposal Stations	The parks department maintains a total number of 22 pet waste stations in the City. Stations are located in publicly owned parks greater than 1 acre as well as other common areas throughout the community.	Parks Budget	Pet station bags used at parks.	Pet bag quantities and locations	Ongoing
Leaf Pick-up Program	The City has contracted with Rogue Disposal to pick up all bagged leaves in the neighborhoods. This is done twice a year	PW Budget	Amount of leaves picked up in tons.	Letter from Rogue Disposal on cost and quantity of service.	Complete

