

October 31, 2025

Pablo Martos, Municipal Stormwater Permit Coordinator
Environmental Solutions Division
Oregon Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, Oregon 97232

RE: Gresham/Fairview NPDES Stormwater Permit #101315
Permit Year 30, 2025 Annual Report

Dear Pablo Martos:

I am pleased to submit a copy of the thirtieth National Pollutant Discharge Elimination System (NPDES) Stormwater Annual Report for the City of Gresham, and the City of Fairview, under Permit No. 101315, File No. 108013, reissued on September 15, 2021, effective on October 1, 2021 and expiring on September 30, 2026.

The goals of the annual report are to 1) document progress on the implementation of best management practices for pollution prevention, reduction and removal; 2) evaluate program results for continuous improvement; and 3) share this information with municipal decision makers and the public. The Environmental Monitoring Plan (EMP) summary and the Gresham and Fairview SWMP Reports will be posted on their respective websites.

The raw monitoring data has been formatted into the templates provided by DEQ and is being submitted as a separate upload through YDO. The City of Gresham collects stream and stormwater data on behalf of Fairview and Multnomah County through an IGA with the two partner agencies, so the raw data being submitted to DEQ meets the requirements in our MS4 permit and detailed in our EMP. A summary of the monitoring program results is included in Section 3. Section 4 describes the Best Management Practices Program Summary and reporting metrics for Gresham. The City of Fairview's report is included in Appendix D.

If you have any questions regarding this report or would like an additional copy, please contact Matt Henry at (503) 618-2657. For questions specific to the City of Fairview's activities, please contact John Niiyama, Public Works Director at (503) 674-6235.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Henry", is positioned above a faint, circular official stamp. The signature is fluid and cursive.

Matt Henry
Senior Environmental Specialist
Department of Environmental Services

cc: John Niiyama, City of Fairview
Torrey Lindbo, Water Quality Program Manager
Chris Strong, Interim Assistant City Manager
Kathy Majidi, Watershed/Parks Manager

GRESHAM & FAIRVIEW NPDES ANNUAL REPORT 2025

PERMIT YEAR 30

MS4 DISCHARGE PERMIT NO. 101315 EPA REF. NO. 108013



Above: City Stormwater Operations crew works on Stark Street to clear a main line that outfalls into Fairview Creek. Background: Beaver Dam located on Fairview Creek off of Birdsdale Ave.

National Pollutant Discharge Elimination System

Permit No. 101315

EPA Reference No. ORS108013

Permit Year 30 Annual Report

City of Gresham and City of Fairview

"We the undersigned, certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment from knowing violations."



Chris Strong P.E.
Interim Assistant City Manager
City of Gresham



John Niyama
Public Works Director
City of Fairview

For additional information regarding this report, please contact:

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City of Fairview NPDES MS4 Annual Report PY 30

1.1 Executive Summary

In accordance with the Clean Water Act (CWA), the Oregon Department of Environmental Quality (DEQ) issued a National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit on September 7th, 1995 to the City of Gresham and co-permittees. Since initial issuance, the city has implemented a stormwater program that has complied with the requirements included in each 5-year permit renewal. The most recent renewal was October 1st, 2021 with the City of Fairview as a co-permittee.

A copy of the permit can be found on the City of Gresham Website:

<https://www.greshamoregon.gov/Watershed-Documents-and-Forms/#PermitsandManagementPlans>

The purpose of an NPDES MS4 permit is to reduce pollutants entering local waterways by requiring permittees to develop and implement a comprehensive Stormwater Management Program (SWMP) to reduce pollutants to the maximum extent practicable. The SWMP is comprised of best management practices (BMPs) that the permittee tracks and reports on each year, documenting progress towards implementing each BMP, and noting any adaptive management that would improve program effectiveness.

This is the 30th annual report of this permit and contains a summary of activities that the City of Gresham and Fairview performed from July 1, 2024 to June 30, 2025 to uphold their commitment to the conditions outlined in the permit. It also includes the monitoring report that summarizes sampling and monitoring conducted during the same time period.

1.1 Reporting Requirements Summary

1. Submit an annual report for July 1 to June 30 of the previous year's activities. Until this year, reports were required in paper and electronic format, but the permit explicitly requires electronic-only submission once DEQ Online becomes available.
2. Post the annual reports to the City's website. Available at [GreshamOregon.gov/Watershed-Documents-and-Forms](https://www.greshamoregon.gov/Watershed-Documents-and-Forms)
3. Implementation summary for the SWMP document metrics, tracking, and assessment of the required elements in Schedule A.3 (Public Outreach, Public Involvement, Illicit Discharge Detection & Elimination, Erosion Control, Development Stormwater Controls, Pollution Prevention/Good Housekeeping, Business Inspection).
4. Summary of Adaptive Management
5. Summary of proposed changes designed to reduce TMDL pollutants.

6. Summary of Education & Outreach and Public Involvement activities
7. Summary of Illicit Discharge screening, inspections, enforcement, and outreach
8. A list of entities referred to DEQ for possible 1200-Z NPDES coverage, list of facilities inspected, and an overview of the results.
9. A summary of stormwater program expenditures, funding sources for the reporting year, and those projected for the next fiscal year.
10. A summary of monitoring program results, including submission of data into the DEQ template and any evaluations of the data conducted by the permittee or consultant.
11. Proposed modifications to the monitoring plan.
12. An overview of concept planning, land use changes, and new development that occurred in the Urban Growth Boundary (UGB) expansion area.
13. The details of corrective actions in Schedule A.1.b.iii (Water Quality Standards).

1.3 Stormwater Program Management Control Measures

The NPDES Permit breaks down the actions the City needs to take into seven areas:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Runoff Control
- Post Construction Site Runoff for New Development and Redevelopment
- Pollution Prevention and Good Housekeeping for Municipal Operations
- Industrial and Commercial Facilities

The permit requirements in these areas detail how and what the City must address in our stormwater management program.

1.4 Stormwater Management Program Document

The Stormwater Management Program (SWMP) Document is the DEQ approved document (2022) developed by Gresham as a road map to meet the control measures set out by the NPDES permit. Gresham and Fairview are co-permittees, but each have their own SWMP that is exclusive to their own municipal area. The SWMP is designed to reduce pollutants to the maximum extent possible (MEP). The SWMP lays out best management practices (BMPs) to work at reducing pollutants to the MEP, with descriptions of the activity, how it is measured, in

what timeframe, and how and when it will be reported. Combined with a water quality monitoring program, these prescribed and documented actions determine what pollutants are affected and help with adaptive management strategies to improve future BMPs.

A copy of the SWMP Document can be found on the City of Gresham Website:

<https://www.greshamoregon.gov/globalassets/city-departments/environmental-services/water-resources/watershed-management/2022-stormwater-management-plan.pdf?id=14473>

1.5 Total Maximum Daily Loads

The City of Gresham is subject to Total Maximum Daily Loads (TMDL) requirements that set Wasteload Allocations (WLAs) for certain pollutants that are found in area waterbodies. Sources are evaluated for each TMDL pollutant, and the WLA is set so that each contributing source knows the reduction needed to bring the stream back into compliance with water quality standards set to protect various beneficial uses. Each watershed has its own set of TMDLs that apply. The Willamette River basin TMDL and the Columbia Slough TMDL apply to both Gresham and Fairview. The Sandy River basin TMDL applies to Gresham. The BMPs in the SWMP are designed to help the city meet these TMDL pollutant reduction requirements.

1.6 Co-Permittee Coordination Efforts

The City of Gresham and City of Fairview are co-permittees on the MS4 permit. Although Gresham is the lead permit applicant, each co-permittee is responsible for development, implementation, and tracking of their jurisdictions' BMPs as well as submitting their respective annual reports. Since the monitoring program is something that Fairview contracts with Gresham to conduct on their behalf, this portion of the annual report is combined. As DEQ has now developed an on-line reporting template, Gresham and Fairview are each independently completing the YDO report template and will be including any relevant attachments. In addition to the template, this traditional report that summarizes progress implementing BMPs in the SWMP Documents for both Gresham and Fairview is being submitted to DEQ. Costs associated with report coordination, outreach, and the implementation of the Environmental Monitoring Plan are shared with Multnomah County and the City of Fairview using intergovernmental agreements (IGAs).

1.7 Legal Authority

The City has maintained adequate legal authority since the inception of their NPDES permit. Chapter 3 of the Gresham Revised Code prohibits erosion and illicit discharges to the stormwater system and local waterways, as well as outlining enforcement authority that the city has for

ensuring compliance. By exercising its powers in a manner consistent with state and federal law, Gresham has the authority to require that the regulations and codes for city, state, and federal standards are met. The City Charter was revised and updated in November 2024.

2.0 Water Protection Areas

Gresham has four main watersheds as shown in Figure 2.0: Map of Gresham MS4 Boundary with Area Watersheds: Fairview Creek, Johnson Creek, Kelly Creek, and the Columbia Slough. All these watersheds cross multiple jurisdictions, such as Fairview, Wood Village, Troutdale, Portland, and the management area of the newly named Urban Flood Safety & Water Quality District (UFSWQD), formerly Multnomah County Drainage District. Gresham communicates with its neighbors and the local watershed councils to ensure efficient outcomes and activities regarding water protection. The City's streams drain to either the Willamette River, the Columbia Slough (which drains to the Willamette) or the Sandy River. All these waterbodies are within the Columbia River basin.

Kelly Creek & Beaver Creek

The Kelly Creek watershed within Gresham encompasses about 2,597 acres (4.1 square miles) and is tributary to Beaver Creek in the Sandy River watershed. In addition to the Kelly Creek watershed, there is an additional 293 acres (0.5 square miles) of Gresham that flows directly into Beaver Creek. The urban service boundary was adjusted in 2003 to exclude a 48-acre parcel of protected Metro open space within the Beaver Creek canyon area at Mount Hood Community College. Kelly Creek originates east of Gresham and enters the city limits east of SE 282nd Avenue and north of SE Dodge Park Boulevard. It flows northwest until its confluence with Burlingame Creek; its main tributary lies northwest of NE Kane Road and NE 18th Court. The confluence of Kelly Creek and Beaver Creek is on the Mount Hood Community College campus. Most of east Gresham drains to Kelly Creek.

Johnson Creek

The entire Johnson Creek watershed encompasses 54 square miles and is a tributary of the Willamette River, which enters the Milwaukie/Portland area. About 5,651 acres (8.6 square miles) lie within Gresham's permit area. Although Johnson Creek does not originate in Gresham, some of the creek's upper reaches flow through the City of Gresham. Presently, Johnson Creek enters the Gresham city limits at SE 252nd Avenue and SE Telford Road, flows in a northwesterly direction to Powell Boulevard and Main Avenue, then generally westward until it leaves the city limits near SE 174th Avenue. Butler Creek, a tributary of Johnson Creek in Gresham, enters Johnson Creek a few hundred yards east of SW Pleasant View Drive. The largest tributary to Johnson Creek that is within Gresham is Kelley Creek. Kelley Creek begins on the buttes in south-central Gresham and flows west through Pleasant Valley to join Johnson

Creek just downstream of where it leaves Gresham. Much of south Gresham, including the downtown area, is in the Johnson Creek watershed. Notably, Johnson Creek is the longest free flowing urban stream in Multnomah County that still hosts returning anadromous salmon.

Fairview Creek

The Fairview Creek watershed encompasses about 3,453 acres (5.4 square miles) and is a tributary to Fairview Lake. About 4.3 square miles of Fairview Creek lie within Gresham's permit areas. Fairview Creek is also recognized as the headwaters of the Columbia Slough. The creek originates within Gresham city limits near West Powell Boulevard and SE 182nd Avenue. The creek flows in a northeasterly direction through Gresham and enters the City of Fairview just west of 223rd Avenue at NE Glisan Street and remains within the City of Fairview's jurisdiction for its remaining length. The Fairview Creek watershed encompasses roughly half of the City of Fairview and the north-central part of Gresham.

Columbia Slough

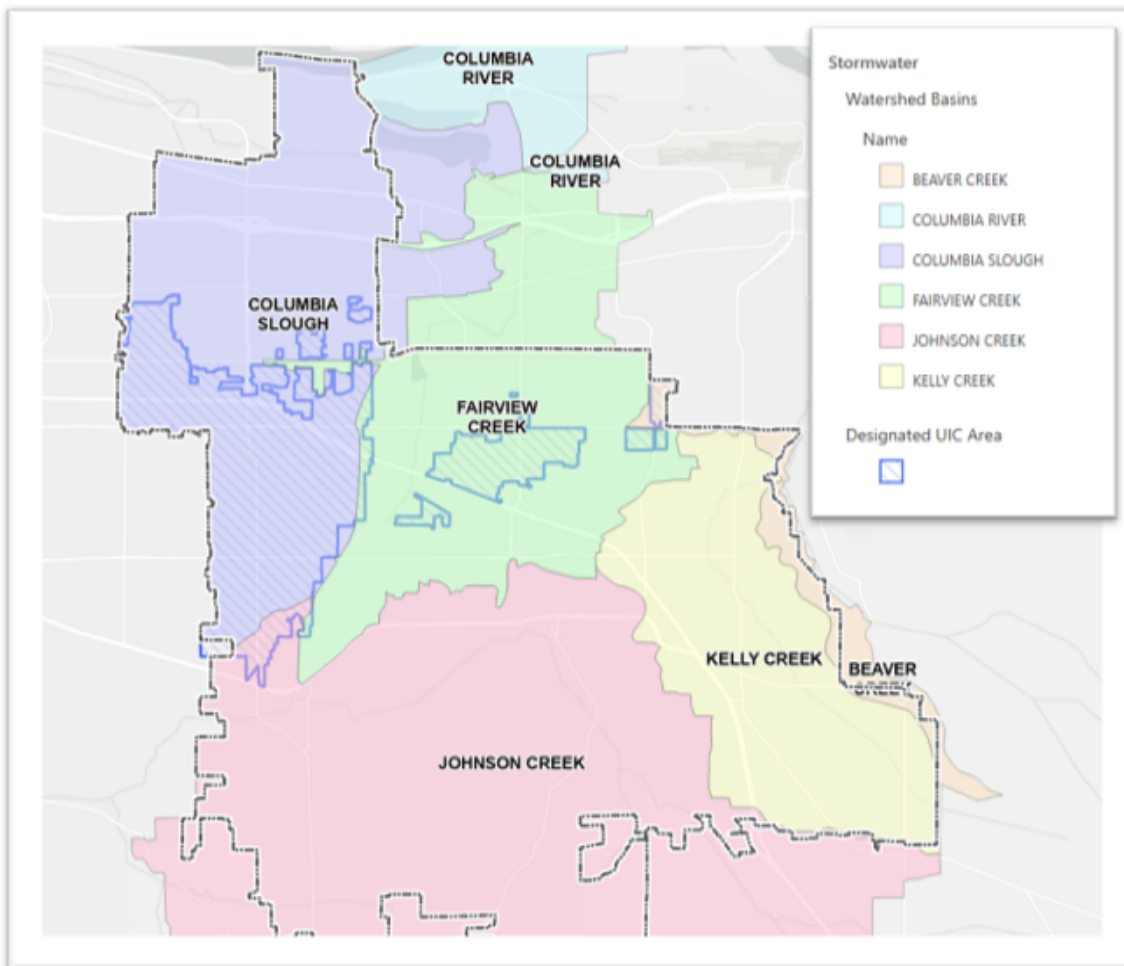
The entire Columbia Slough watershed encompasses approximately 62 square miles, of which about 4,567 acres lie within the Cities of Gresham and Fairview. About 6 square miles are within Gresham's permit area and is in northwest Gresham. The Columbia Slough parallels the Columbia River and flows west to its confluence with the Willamette River. While there are several major piped stormwater outfalls within west Gresham that drain to the slough, most of west Gresham's drainage is served by drywells, also known as underground injection controls, that drain to groundwater.

Groundwater

Discharges to groundwater are not subject to the requirements of the NPDES MS4 permit. As shown in Figure 2.0, there are approximately 2,250 acres within the city that drain to groundwater. The City implements a groundwater protection program for industrial and commercial businesses that use and/or store hazardous chemicals, which includes the Business Inspection Program in the SWMP document. All the BMPs described within the SWMP document are applied across the city, irrespective of the above or below-ground nature of the receiving water body. The City's Water Pollution Control Facilities (WPCF) Permit was issued on December 10, 2012, and renewed on October 11, 2024.

Note: This map includes both the portions of the City of Gresham that drain to surface waters subject to the NPDES MS4 permit (~12,921 acres) and the Underground Injection Control Facility areas draining to groundwater (~2,250 acres) that are covered under the City's WPCF Permit. The city runs its programs and services consistently across both areas to ensure environmental protection goals are met. The City and surrounding agencies also collaborate to create and update an interjurisdictional map that illustrates inlets, pipe, and other asset ownership so that agencies can coordinate cleanup management for spills.

Figure 2.0: Municipal Separate Storm Sewer Discharge Permit Boundary with Area Watersheds



3.0 Monitoring Program

Cities of Gresham & Fairview Environmental Monitoring Program Summary

History

The City of Gresham has continued to adaptively manage its Environmental Monitoring Plan (EMP) every few years based upon the addition of parameters and scientific inquiries to answer questions about green infrastructure pollution reduction performance. The City of Gresham submitted a revised EMP to DEQ in July 2022 which was approved in August 2022. This report reflects the third year of monitoring under that document. This report covers data collected for City of Fairview to meet the permit requirements for their jurisdiction.

Table 3.1 Program Commitments (Fiscal Year 2024-2025, Permit Year 30)

Monitoring Type	Monitoring Location(s)	Monitoring Frequency	Pollutant Parameter Analyte(s)	Notes
Instream Monitoring	<i>Three (3) sites in the Columbia Slough basin:</i> 1. Fairview Lake @ Lake Shore Park (FVL1) 2. Fairview Creek @ mobile estates (FCI0) 3. Fairview Creek @ Stark (FCI1) <i>At least two (2) sites in the Sandy River basin:</i> 1. Kelly Creek @ Mt. Hood Community College Pond (KCI1) 2. Kelly Creek downstream of Detention Pond (KCI3) 3. Kelly Creek upstream of Detention Pond (KCI4) 4. Beaver Creek at canyon footbridge (BCI1)	Four (4) events/year	<i>DO, pH, temperature, conductivity, turbidity, E. coli, hardness, BOD, TSS, Chlorophyll-a (May-Oct); nutrients (nitrate, ammonia, Total P, ortho-phosphorus); Total recoverable and dissolved metals (copper, lead and zinc); total mercury; legacy pesticides (JC only)</i>	The City of Portland collects data on the entire Columbia Slough, but based on their probabilistic sampling design, locations monitored any permit year will be reported to DEQ by Portland. The two sites in Beaver Creek are monitored through an IGA with Multnomah County to meet their permit requirements.

	5. Beaver Creek at Division St. triangle (BC12) <i>Four (4) sites in the Johnson Creek subbasin:</i> 1. Johnson Creek @ Jenne Rd (JC11) 2. Johnson Creek @ Palmblad (JC12) 3. Kelley Creek @ Pleasant Valley Grange (KI1) 4. Kelley Creek @ Rodlun Rd (KI2)			
Continuous Instream Monitoring	<i>Two (2) continuous monitoring stations:</i> 1. Johnson Creek @ Regner 2. Fairview Creek @ Glisan*	<i>Ongoing</i> 15-minute interval	<i>Temperature and flow</i>	Flow data collected by USGS through Joint Funding Agreement #3225. *Fairview gage does not collect temperature. City of Gresham periodically collects summer temperature at Glisan location, as well as other locations throughout city.
Stormwater Monitoring - Storm Event	<i>Ten (10) sites.</i> Monitored 10 random and spatially balanced stormwater locations (5 fixed and 5 rotating).	<i>One (1) event/year</i> Monitored 1 event at each location	<i>DO, pH, temperature, conductivity, turbidity, E. coli, hardness, BOD, TSS; nutrients (nitrate, ammonia, Total P, ortho-phosphorus);</i>	The City's approved monitoring approach results in 10 data points (5 fixed sites and 5 randomly selected rotating sites).

			<i>Total recoverable and dissolved copper, lead and zinc; total mercury; pesticides</i>	
Macro-Invertebrate Monitoring	<i>At least one (1) site in the Columbia Slough basin:</i> 1. Fairview Creek @ mobile estates (FCI0) 2. Fairview Creek @ Stark (FCI1) <i>At least one (1) site in the Sandy River basin:</i> 1. Kelly Creek @ Mt. Hood Community College Pond (KCI1) 2. Kelly Creek downstream of Detention Pond (KCI3) 3. Kelly Creek upstream of Detention Pond (KCI4) 4. Beaver Creek at canyon footbridge (BCI1) 5. Beaver Creek at Division St. triangle (BCI2) <i>Two (2) sites in the Johnson Creek subbasin:</i> 1. Johnson Creek @ Jenne Rd (JCI1) 2. Johnson Creek @ Palmblad (JCI2) 3. Kelley Creek @ Pleasant Valley Grange (KI1) 4. Kelley Creek @ Rodlun Rd (KI2)	One (1) event/year during summer/low flow conditions	Macroinvertebrates	Generally collected during same week as instream water quality data collection in summer. The two sites in Beaver Creek are monitored through an IGA with Multnomah County to meet their permit requirements. Additional sites were collected as part of the Johnson Creek Inter-Jurisdictional Committee and the Beaver Creek Conservation Partnership.

Structural BMP Monitoring	<i>Two (2) sites - inlet and outlet:</i> 1. Panza Constructed Wetland (<i>Kelley Creek</i>) 2. Fairview Creek Regional Water Quality Facility	<i>One (1) event/year</i> Monitored 1 event at 2 facilities	<i>DO, pH, temperature, conductivity, turbidity, E. coli, hardness, BOD, TSS; nutrients (nitrate, ammonia, Total P, ortho-phosphorus); Total recoverable and dissolved metals (copper, lead and zinc); total mercury</i>	
Special Projects	<i>Two (2) sites:</i> 1. Instream long-term locations 2. Mt. Hood Community College dam	<i>One (1) event/year</i>	<i>Depends on the project. Measured 6PPD-quinone in PY30.</i>	

Monitoring Program Summary

The raw monitoring data collected in Permit Year 30 is summarized below and has been formatted into the template provided by DEQ and is being submitted as a separate upload through YDO. This data includes data to cover the City of Fairview's monitoring requirements. The instream data have been compared to the relevant DEQ water quality criteria, and values that do not meet the water quality standards are discussed below in section A – Instream Monitoring. Data from Stormwater (wet weather) Monitoring and Structural Best Management Practice (BMP, i.e. green infrastructure) Monitoring data has not been compared to water quality standards because of the mixing that occurs in-stream. Sampling locations are shown in **Figures 3.1 through 3.6**.

A. Instream Monitoring

Twelve long-term instream monitoring sites were sampled in July, October, January, and April during the reporting term (**Figure 3.1**) and compared to relevant water quality standards (**Table 3.1**). The October sampling event had 0.24" of rainfall in the previous 24 hours and the April event had 0.12" while the other two events had no measurable precipitation in the preceding 72 hours.

Instream monitoring results were generally within expected ranges. There were some exceedances of water quality standards for temperature, pH, total phosphorous, chlorophyll-a, mercury, *E. coli*, and DDT, which are discussed below. Several related water quality standards were exceeded in Fairview Lake, and they are discussed separately. The remainder of the sites are located in streams and exceedances are discussed together and listed by water quality parameters.

Figure 3.1

Note: BCI1 and BCI2 are monitored through an IGA with Multnomah County to meet their permit requirements.

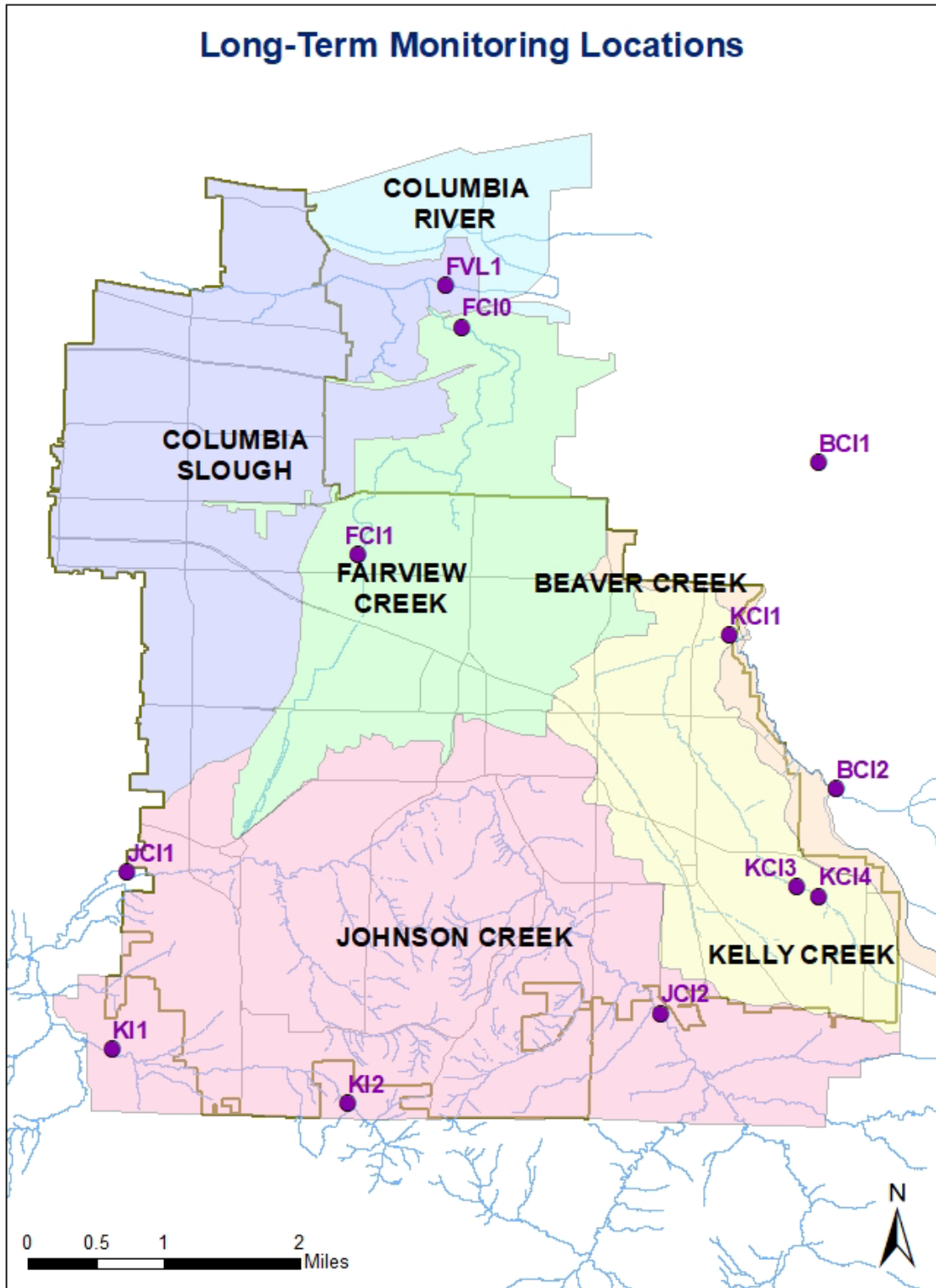


Table 3.2 Relevant Instream Water Quality Standards

TMDL Water Quality Constituents		
Water Body	Constituent	Water Quality Criteria
Fairview Creek	Temperature	No designated salmon and steelhead spawning use. Rearing: <18 °C
	<i>E. coli</i>	<406 organisms/100mL (OAR 340-41)
	Phosphorus	0.1549 mg/L (Columbia Slough 1998 TMDL)
	Mercury	0.14 ng/L
Johnson Creek, including Kelley Creek tributary	Temperature	Spawning: <13 °C (55.4 °F) - October 15 to May 15. Rearing: <18 °C
	<i>E. coli</i>	406 organisms/100mL (OAR 340-41)
	PCBs	Acute 2.0 ug/L, Chronic 0.014 ug/L (per Table 30)
	PAHs	Not included in Table 40 or 41. Table 30 only lists saltwater acute level of 300 ug/L
	Dieldrin	Acute <0.24 ug/L, Chronic <0.056 ug/L (per Table 30)
	DDT	Acute <1.1 ug/L, Chronic <0.001 ug/L (per Table 30)
	Mercury	<0.14 ng/L
Beaver Creek, including Kelly Creek tributary	Temperature	Spawning: <13 °C (55.4 °F) - October 15 to May 15. Rearing: <18 °C
	<i>E. coli</i>	406 organisms/100mL (OAR 340-41)
Columbia Slough	Temperature	No designated salmon and steelhead spawning use. Rearing: <18 °C
	<i>E. coli</i>	406 organisms/100mL (OAR 340-41)
	pH	between pH 6.5 - 8.5
	DO	No spawning; 6.5 mg/L: cool-water aquatic life (avg); 4.0 mg/L: absolute minimum (Columbia Slough TMDL); 5.5 mg/L: warm-water aquatic life
	Phosphorus	0.1549 mg/L (Columbia Slough 1998 TMDL)
	Chlorophyll-a	15 mg/m ³
	Pb	Based on hardness. Table 30 has formula
	PCBs	Acute 2.0 ug/L, Chronic 0.014 ug/L (per Table 30)
	Dieldrin	Acute 0.24 ug/L, Chronic 0.056 ug/L (per Table 30)
	DDT/DDE	Acute 1.1 ug/L, Chronic 0.001 ug/L (per Table 30)
	Dioxins	Fish tissue 0.07 ng/kg (Columbia Slough 1998 TMDL)
	Mercury	0.14 ng/L

Non-TMDL WQ Constituents from OAR 340-41 Table 30		
	Constituent	Criteria
	Metals	Based on hardness, formula in Table 30
	pH	Between 6.5-8.5: same for all watersheds in the permit area (OAR 340-41)
	DO	Not evaluated, since the criteria are for averages. Cold water aquatic life; spawning: >11 mg/L; nonspawning >8.0 mg/L
	Alkalinity	20 mg/L (minimum)
	Ammonia	Based on pH and temperature, formula in Table 30
	Aldrin	Acute 3 ug/L
	Endosulfan	Acute 0.22 ug/L, Chronic 0.056 ug/L
	Endosulfan Alpha	Acute 0.22 ug/L, Chronic 0.056 ug/L
	Endosulfan Beta	Acute 0.22 ug/L, Chronic 0.056 ug/L
	Endrin	Acute 0.086 ug/L, Chronic 0.036 ug/L
	Heptachlor	Acute 0.52 ug/L, Chronic 0.0038 ug/L
	Heptachlor Epoxide	Acute 0.52 ug/L, Chronic 0.0038 ug/L

Fairview Lake

During the July sampling event Fairview Lake exceeded water quality standards for pH (standard: 6.5-8.5, value: 8.65), temperature (standard: <18 °C, value: 24.3 °C), phosphorus (standard <0.1549 mg/L, value: 0.675 mg/L), and chlorophyll-a (standard: < 15 mg/m³, value: 134 mg/m³). It also exceeded the temperature standard in April (18.5 °C), the chlorophyll-a standard in October (37.0 mg/L), and all samples were above the total mercury target (target <0.14 ng/L, values: 0.83-2.24 ng/L). This large, shallow lake is ringed by houses with lawns and has very little shade. These conditions generally lead to the lake being very warm in the summer with relatively high nutrient levels which lead to algal blooms and high pH values. Gresham and Fairview participate in the Regional River Starts Here campaign which serves Multnomah County residents with lawn care tips for healthy water to encourage lower impact lawn care behaviors.

Temperature

Sites in each watershed exceeded the water quality standard of <18 °C for fish rearing during the July sampling event, with temperatures ranging from 18.1-21.1 °C. One site on Johnson Creek exceeded the standard of <13 °C for fish spawning during the April sampling event, with a value of 13.4 °C. There is further discussion of temperature exceedances in the continuous monitoring section below. The City continues to concentrate efforts on reducing stream temperatures including riparian restoration, consideration of future in-channel pond projects, and protection and enhancement of riparian buffers and of wetlands adjacent to streams, as access and cooperation allows.

Dissolved Oxygen, pH, and alkalinity

Dissolved oxygen ranged from 5.64-14.12 mg/L. These grab samples are not typically compared to the water quality standard for dissolved oxygen because the standard is developed for average values over time. pH values ranged from 6.35-7.96, with samples at one site being below the water quality standard range of 6.5-8.5. The low pH samples were in Fairview Creek at FC11 which is largely made up of groundwater. One sample in upper Johnson Creek was below the minimum alkalinity water quality standard of 20 mg/L at 16.4 mg/L. This location is at the upstream end of Gresham where water flows in from agricultural fields before reaching the City boundary.

Metals

All samples exceeded the instream water quality target established by the 2019 TMDL of 0.14 ng/L for total mercury with values ranging 0.27-5.97 ng/L. The typical sources of mercury are atmospheric deposition from natural sources (ocean and volcanoes) and anthropogenic sources like industrial emissions, coal combustion and mining. The primary contribution of mercury in Gresham streams is likely from atmospheric deposition carried to the streams in runoff. Mercury is correlated with total suspended solids due to its affinity with organic matter. The City continues to prioritize stormwater treatment BMPs which remove suspended sediment and implement our erosion control program. Samples in Kelly Creek exceeded the average water quality standard values in Kelly Creek during the October and April sampling events (total copper 16.6 ug/L, dissolved copper 7.88-14.2 ug/L, total zinc 228 ug/L, and dissolved zinc 74.5-204 ug/L). These samples were taken during runoff events and copper and zinc are associated with car brake pads and tires. The City continues to prioritize retrofits on high-traffic roads which would reduce these metals in the streams.

E. coli Bacteria

Seven sites exceeded the *E. coli* water quality standard of 406 MPN/100 ml at some point during the year, with about half of the exceedances during events with stormwater runoff. No samples were above our action level of 5,000 MPN/100 mL and all exceedances were within typical ranges (460-700 MPN/100 mL). Past follow-up monitoring indicates that they are likely due to wildlife use and/or biofilms. The City continues to implement doggie bag stations across our parks to reinforce the norm of picking up after your pet.

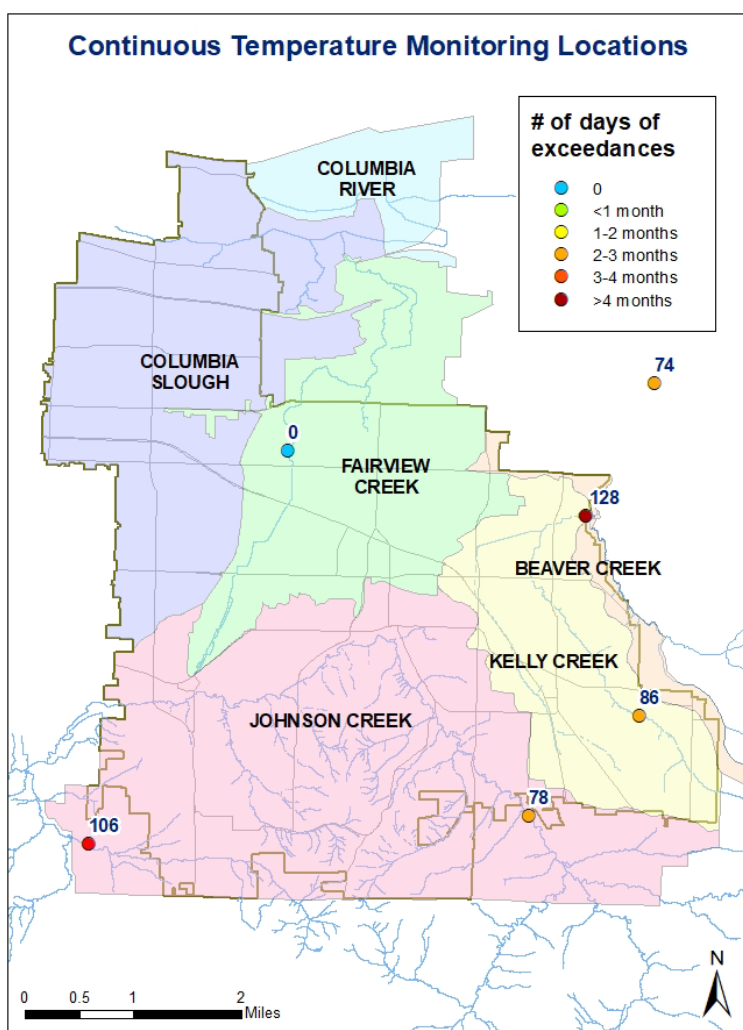
DDT Legacy Pesticide

The two sites on Johnson Creek were sampled for DDT and its degradates with no sample exceeding the acute water quality criterion of 1.1 ug/L. However, several samples at each site exceeded the chronic water quality criterion of 1.0 ng/L (1.3-79 ng/L). The City continues to prioritize stormwater treatment BMPs which remove suspended sediment and to implement our erosion control program.

B. Continuous Temperature Instream Monitoring

Continuous hourly temperature was measured at long-term instream monitoring sites from July 2024-June 2025. This is the first year of switching from summer-only monitoring at many sites to year-round monitoring at fewer sites. Loggers were lost at several sites during the year and new protocols will be used for future years. The sites with a full year of continuous data are shown in **Figure 3.2**. A summary of the maximum values and exceedances is found below in **Table 3.3**. Similar to past years, most sites exceeded the temperature standard of 18 °C for the 7-day average of the daily maximum (7DADM) at some point during the summer.

Figure 3.2



Only one site, a groundwater-fed section of Fairview Creek (FCI1) met the standard for the entire year. Most sites exceeded the temperature standard for two to three months. The City is aware of the impact in-line ponds can have on temperature and is looking at opportunities to reduce temperature loading from public and private ponds. Mount Hood Community College (MHCC) has been exploring ways to reduce the temperature impact their pond has on Kelly and Beaver Creeks.

Table 3.3 Summary of Temperature Exceedances by Location.

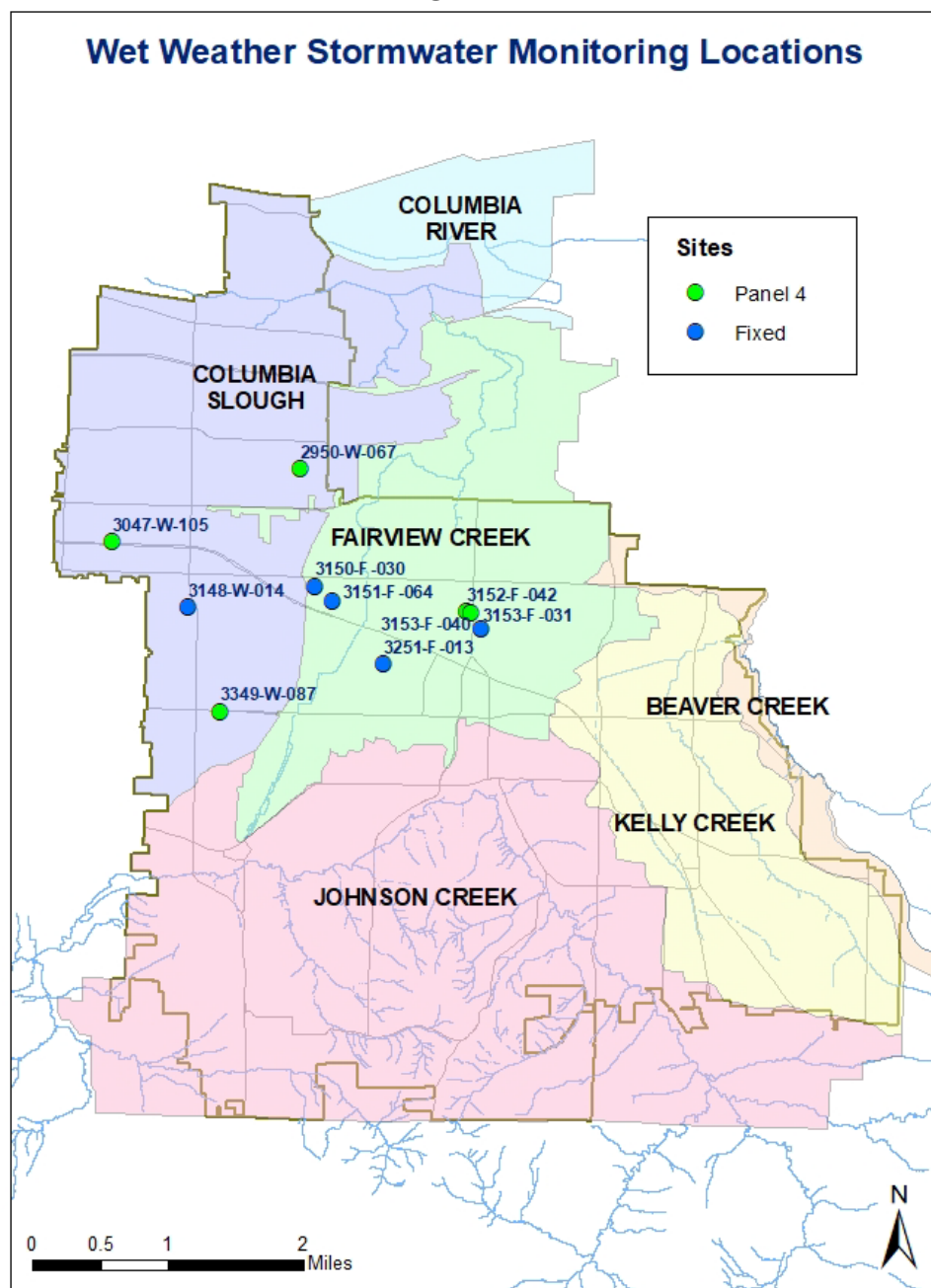
Sites with no exceedances are shown in blue text and those with more than three months of exceedances are shown in red text. Within the Location column, “US” indicates upstream and “DS” indicates downstream.

Watershed	Creek	Location	Max 7DADM temp (*C)	Exceedances (# of days)
Beaver Creek	Beaver Creek	BCI1 Troutdale/Division Triangle	22.0	74
Beaver Creek	Kelly Creek	KCI1 downstream MHCC pond	26.0	128
Beaver Creek	Kelly Creek	KCI3 downstream KCD pond	25.1	86
Fairview Creek	Fairview Creek	FCI1 Stark St.	16.9	0
Johnson Creek	Johnson Creek	JCI2 Palmblad Rd.	23.9	106
Johnson Creek	Kelley Creek	KI1 Foster Rd.	31.2	78

C. Wet Weather Stormwater Monitoring

Wet Weather Stormwater sampling was conducted at ten sites with small drainages to assess land use. Five of these sites are long-terms sites (Fixed) which are sampled every year and five are rotating sites (Panel 4) which are stratified for traffic volume such that half of the samples drain roads with >1,000 vehicle trips per day.

Figure 3.3

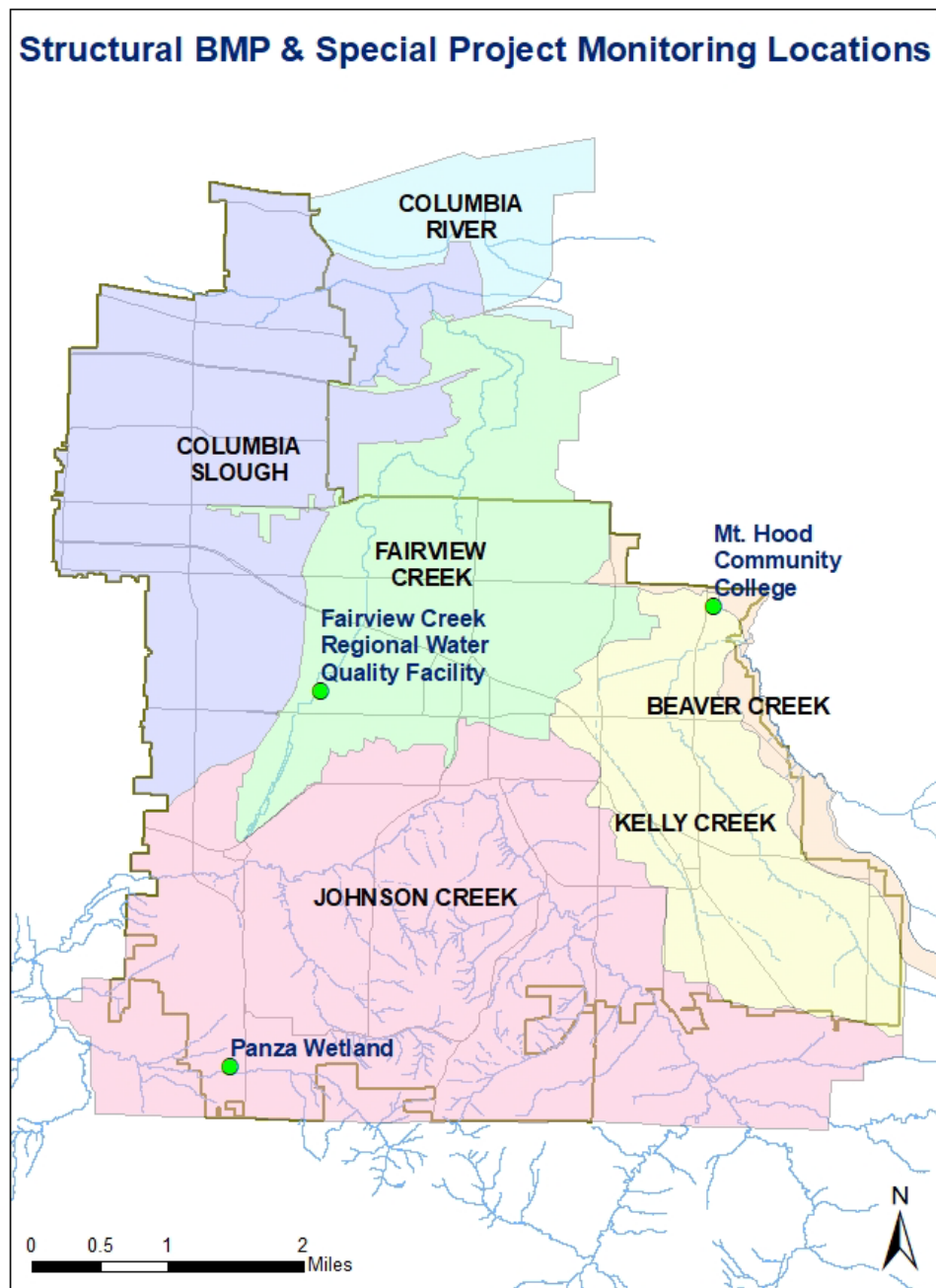


Similar to previous years, stormwater monitoring data revealed that higher traffic sites (>1,000 vehicle trips per day) have higher pollutant concentrations for many pollutants in comparison to residential streets (<1,000 vehicle trips per day). This was especially true for turbidity, E. coli, nitrogen, antimony, and PAHs. Also similar to previous years, relatively high levels of several heavy metals, including lead and zinc, were found at some sites. Cars are known to be major sources of these metals.

D. Structural Stormwater Facility Best Management Practice (BMP) and Special Projects Monitoring

Storm samples were collected at structural stormwater BMP facilities in addition to special project sampling described below (**Figure 3.4**).

Figure 3.4



Structural Stormwater Facilities

Storm samples were collected at the inlets and outlets of two water quality facilities - Panza Wetland (*in Kelley Creek*) and Fairview Creek Regional Water Quality Facility. The Panza facility is a constructed wetland in a new development and the monitoring aimed to inform stormwater management requirements for upcoming developments. The Fairview facility is a retrofit to treat water from a large drainage area of existing city.

The Panza pond was constructed in 2022 as a trial of a submerged gravel wetland where there is a layer of gravel with an underdrain beneath the vegetated surface. The gravel layer is designed to be inundated. In practice, the pond itself always holds a few inches of water because of shallow groundwater in this area. This is the third year that the Panza pond was monitored. In the first year, results were similar to the first year of many bioretention facilities, where pollutant removal was moderate for TSS, total phase metals, and PAHs, but there was also some export of nutrients. In the second and third years of sampling the Panza pond had moderate to high removal of most pollutants of concern and no export. Of particular note, it demonstrated removal of dissolved phase metals at a higher rate than any other facility we have monitored. This is likely because the stormwater is filtering through soil before it enters the underdrain. This is encouraging, and we will continue to monitor this facility. However, maintenance of this type of facility is a concern because clogging may occur due to the nature of the underground perforated pipes.

The Fairview facility was constructed in 2006 and has been monitored periodically since then. A retrofit of the facility took place in summer 2025 and this sampling acted as a baseline for how the facility was performing after almost 20 years of use and before this retrofit. In general, pollutant removal levels have been fairly consistent over the 20 years of this facility.

Additionally, in PY30 we published a peer-reviewed scientific study on the water quality benefits of porous pavement from data collected as part of BMP monitoring from previous years (Holzer & Poor, 2024, Reduction in Runoff Pollutants from Major Arterial Roads Using Porous Pavement, *Sustainability*, 16(17), 7506). The publication is included with our Annual Report submission and can be found here: [Reduction of Runoff Pollutants from Major Arterial Roads Using Porous Pavement](#).

Special Projects

The sampling for Special Projects in PY30 was focused on the tire chemical 6PPD-quinone (6PPD-q), which is derived from tire wear particles. Samples were taken instream during storms

at the Mt. Hood Community College dam, at long-term monitoring locations, and throughout Beaver Creek.

The samples at the Mt. Hood Community College dam were taken upstream and downstream of the dam-created pond at several points before, during, and after a storm event to determine if the pond reduces 6PPD-q concentrations. We did see a ~2-hour delay of the 6PPD-q pulse as the water was detained below the dam, but we did not see any reduction in concentration. This pond is not vegetated. Other studies have shown that vegetated ponds can reduce 6PPD-q concentrations.

The samples at long-term sites were taken during a storm event and showed a general pattern of higher 6PPD-q concentrations in streams which receive more urban stormwater runoff.

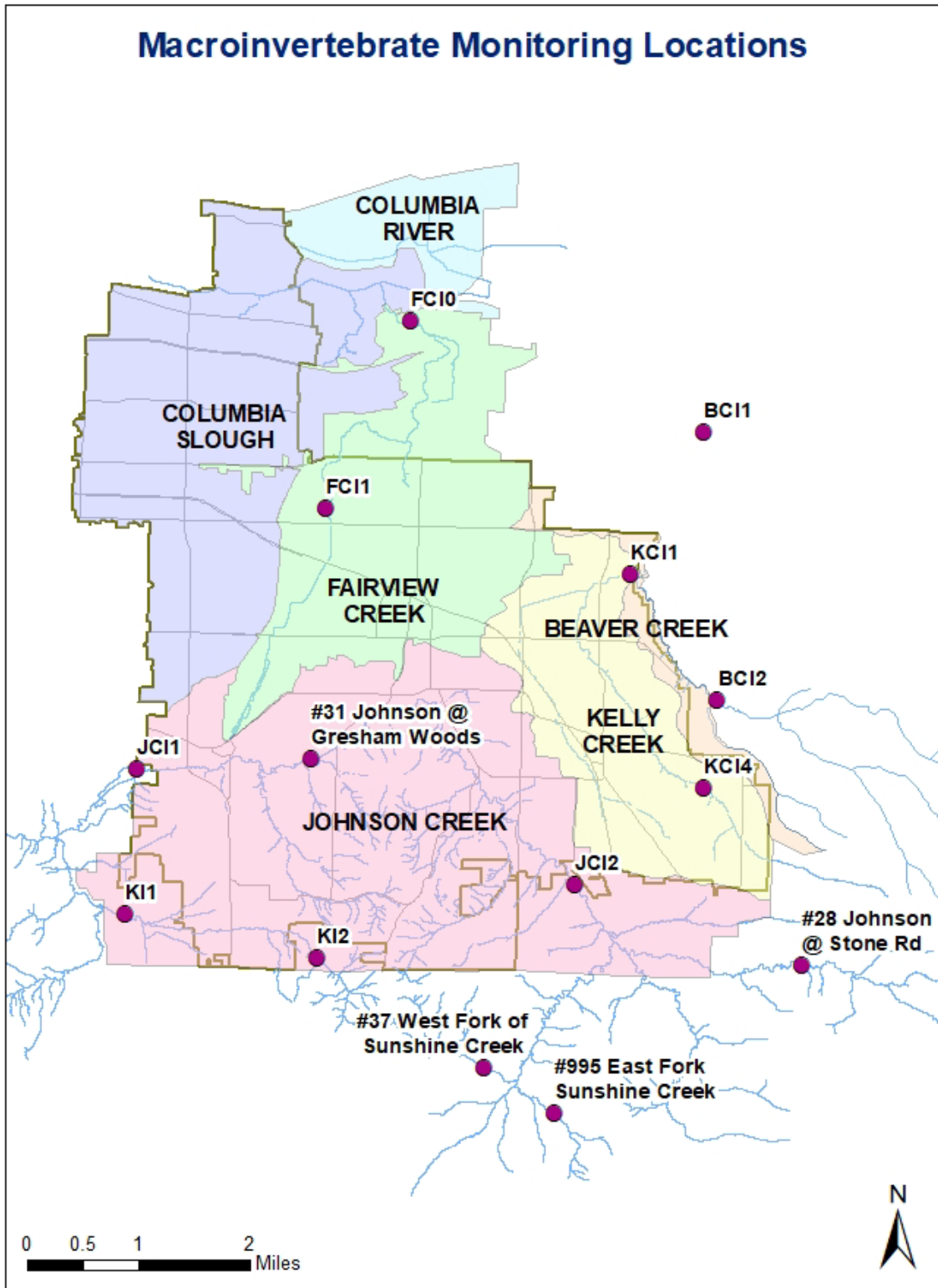
The samples in Beaver Creek were taken during a storm event with one grab sample at each of several locations throughout the stream system. The highest concentration of 6PPD-q was found near a large stormwater outfall on Stark St. which is upstream of where a large amount of coho salmon pre-spawn mortality has been observed. This outfall takes combined runoff from the City of Gresham and Multnomah County.

E. Macroinvertebrate Sampling

Macroinvertebrate samples were collected in July and August at long-term stream monitoring sites as well as several locations of interest throughout the Johnson Creek and Beaver Creek watersheds in conjunction with the Johnson Creek Inter-Jurisdictional Committee and the Beaver Creek Conservation Partnership (**Figure 3.5**).

In PY30 Gresham contracted entomologist Zee Searles Mazzacano to conduct an assessment of the City's 17-year macroinvertebrate dataset (attached to the online submittal). In summary, this assessment found significant unidirectional trends in at least one community metric at half of all sites sampled for three or more years, suggesting that ongoing environmental factors are operating throughout the system, with temperature, fine sediment, organic enrichment, and disturbance frequently inferred as stressors. Several trends were increasing, especially at sites with restoration activities.

Figure 3.5 Macroinvertebrate Monitoring Locations
Sites BC11 and BC12 were monitored for Multnomah County through an IGA.



3.1 Illicit Discharge Detection & Elimination Program

A. Dry Weather Screening Summary

A total of 30 outfalls were assessed during dry weather screening monitoring: 8 long-term high priority sites and 22 rotating sites. Flow was present at 11 sites, and the screening parameter results for those sites are presented below in **Table 3.6**. The only parameters which exceeded action levels were chlorine (one site) and turbidity (three sites). The site with chlorine was observed to be surrounded by well-watered green lawns. Two of the sites with high turbidity had field notes that muck at the bottom of the pipe was stirred up with the sampling rod, and the remaining site had high levels of iron bacteria which increased turbidity. Investigations of the drainage areas did not reveal any illicit discharges.

The City's illicit discharge enforcement response procedures are described in Section 7 of the Environmental Monitoring Plan on the City's website at: www.greshamoregon.gov/watershed

Figure 3.6 Dry Weather Screening Monitoring Locations

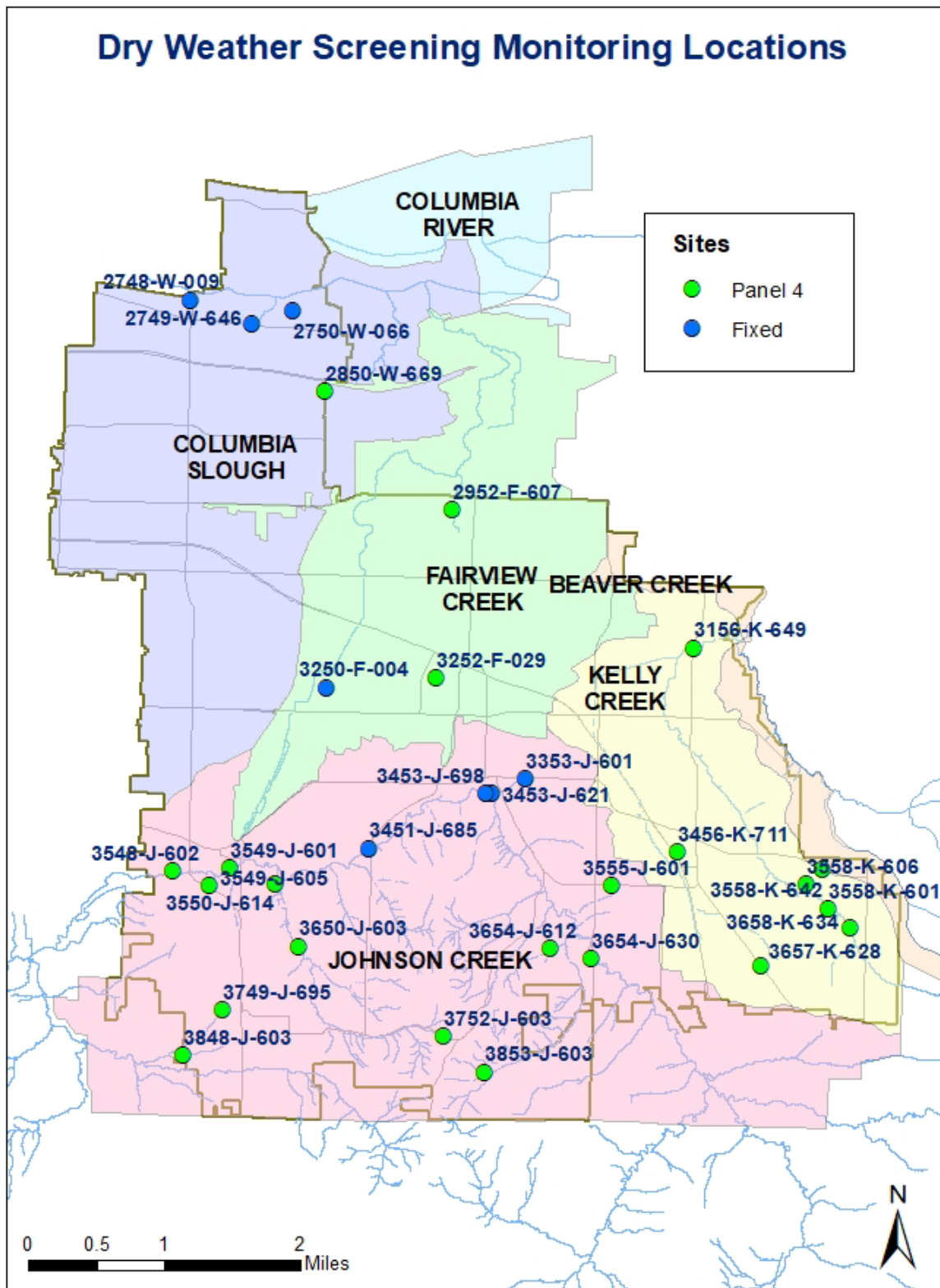


Table 3.6 Dry Weather Screening Flow Sampling Results

Action level exceedances are shown in red text.

Site Code	Date	Chlorine (mg/L)	Ammonia (mg/L)	pH	Temp (*C)	Conductivity (uS/cm^3)	Turbidity (NTU)
3456-K-711	9/4/2024	0.6	0.4	7.74	19.6	90.9	5.99
3548-J-602	9/3/2024	0	0	7.2	17.5	105.2	8.99
3549-J-601	9/3/2024	0	0	8.24	19.6	197.8	6.5
3549-J-605	9/3/2024	0	0.4	7.52	17.4	184.5	16.2
3550-J-614	9/3/2024	0	0	7.4	17.8	40.0	34.4
3555-J-601	8/29/2024	0	0	8.05	15.7	164.5	1.55
3558-K-601	9/4/2024	0	0	7.93	16.7	140.7	1.13
3558-K-606	9/4/2024	0	0	7.27	17.1	178.9	1.02
3558-K-642	9/4/2024	0	0	7.78	16.5	189.2	9.75
3650-J-603	9/3/2024	0	0.25	7.42	17.3	181.8	13
3654-J-612	9/3/2024	0	0.4	6.95	18.6	267.4	22.9

B. Environmental Monitoring Plan Adaptive Management

No adaptive management changes are proposed.

4.1 Stormwater Best Management Practice (BMP) Summary

The activities, descriptions, and metrics detailed in this section are the BMPs that address the Stormwater Program Management Control Measures. (See Table 4.1). The heading of each subsection of BMPs addresses any applicable pollutants. These pollutants, monitoring results, and affected waterbodies can be found in **Section 3.0 (Monitoring Program)**.

4.1a Stormwater Program Adaptive Management

Per DEQ and the NPDES MS4 permit, the City can refine and improve programs by evaluating results and adjusting their actions. The City proposes a change to **(D.) School and Youth Outreach**, found under **Public Reporting, Engagement, Outreach & Behavior Change** in Table 4.1. The reason for this change is to formally institute a more deliberate program for school and youth outreach where previously time and staffing inhibited such a program. The proposed change is detailed in Table 4.1.a

4.2 Urban Growth Boundary Permits and Forecasting

In FY 24-25 (all Pleasant Valley, except as noted):

- We have been processing (since the end of 2020) on SE 190th Ave (across from SE Richey Rd) a 180-lot (the number has varied) subdivision (Veranda) in Pleasant Valley. Construction expected to start in FY 25-26.
- The Sycamore Vista Subdivision (SE 182nd Ave, north of SE Giese Rd – recorded as Highlands @ Pleasant Valley) was approved in 2018 and is near completion.
- Brookside Townhomes (SE 190th Ave) was approved and constructed FY 21-22 and – the homes have been constructed.
- Construction of the last phase of Sunset Village. Expected to be finished in FY 25-26.
- Review and construction of homes in Sunset Village and Brookside North continue.
- Construction of homes in the Telford Estates Subdivision (Springwater) completed.
- Construction of Terrace @ Pleasant Valley (Giese Rd), home construction continuing.
- Construction of Butler Creek Subdivision (Pleasant Valley adjacent – Middle Housing).
- Completion of the Pleasant Valley Concept Plan “relook,” with expected Code Revisions in FY 25-26.

There was one pre-application received for annexations into the City, 17231 SE McKinley Rd.

Table 4.1 Best Management Practices

Stormwater Assets Maintenance Program (SMP) A-L.
BMP Owner: Stormwater Operations & Maintenance Group, supported
by GIS and Stormwater Science & Policy & Engineering

Pollutants addressed	Actions from these BMPs remove sediment and total phase pollutants, but do little to address dissolved pollutants. Pollutants that attach to sediment include bacteria & other pathogens, nitrogen, phosphorus, organic compounds, legacy pesticides, polycyclic aromatic hydrocarbons, and total phase metals. While removal of total metals is important, since benthic organisms are found in stream sediments, dissolved metals can still impact aquatic organisms. Metals that are in dissolved form <i>and</i> known to be acutely toxic to fish include cadmium, copper, lead, mercury, silver and zinc. Control of sediment also reduces turbidity; clearer water creates better conditions for fish to hunt, breathe, and lay eggs. Controlling sediment also helps reduce nutrients, particularly phosphorus, which can cause excess algae growth impacting both dissolved oxygen, pH, and other water quality parameters.			
<i>Activities with * are a BMP also associated with the TMDL IP and are also part of the TMDL Annual Report. These shared activities are either directed to a table in the NPDES Annual Report or reported seperately in Appendix B; TMDL Annual Report 2024-2025</i>				
Activity Name	Description	Measurable Goal	Timeframe	Reporting Metrics FY 24-25
A. Pipe Cleaning*	The City’s stormwater system currently consists of approximately 242 miles of pipes that drain to both surface and groundwater. The City inspects a portion of its existing pipes each year for assets management that record the condition and repair needs in the near and long term. Pipes are cleaned to remove excessive buildup, if the SOP threshold for cleaning is met.	Inspect 10 to 15 miles, clean if SOP threshold is met	Inspect: annually/ongoing Cleaning projected to be an average of 1-5 miles over permit cycle	27.3 yds of debris removed, 8.03 miles of pipe cleaned. 1030 hours spent pipe cleaning
B. CCTV Pipes (new/existing)	Inspect new development pipe systems to ensure proper connections. CCTV inspect existing city pipes for repair, cleaning, asset management rating, resident concerns, illicit discharge investigation. This serves as part of the City's asset management program and also as a proactive measure to ensure there are no cross connections from new development, and also finds can find cross connections as efforts to inspect and clean pipes move about the city.	CCTV 100% of new pipe (reported metric also contains cctv miles for existing pipe as miles are not tracked separately)	annually/ongoing	CCTV: 3468 hours, 16.17 miles inspected (includes new developoment and existing pipes which are not tracked separately, investigations, paving, CIP requests)
C. Storm Drain Cleaning*	The City’s stormwater system currently consists of approximately 9,340 stormdrains that drain to both surface and groundwater. Arterial drains are priority due to higher pollutant loads than lower traffic streets and residential are also a priority due to potential for clogging and minor flooding. Inspection of all drains is a goal, but due to parked cars (even after notices are given) 100% is not attainable. Note that drain inventory has historically grown by 50-100/yr. Studies have shown that drains tend to remobilize trapped sediment once 2/3 or more full, and at this time is the City's SOP cleaning threshold. Typically, the City cleans all drains regardless of reaching the threshold, which is a higher performance standard. The range quoted allows flexibility in work load shifting to address other significant water quality facility rehabilitation activities in the future, as needed, while still meeting objectives over the permit cycle.	Inspect 90% of all drains, at a minimum clean if SOP threshold is met. Sediment removal from 5,000 to 8,000 drains/yr.	annually/ongoing	Residential 6,876 drains cleaned, 189 yds of debris removed. Arterial 1,463 drains cleaned, 84 yds of debris removed.

D. Maintain Green Infrastructure	Inspect and maintain vegetated facilities. Staff inspects and maintains as needed publicly owned: ~50 detention ponds & swales, ~750 rain gardens, plus private multiple owner facilities: 72 detention ponds & swales. Maintenance activities include control of noxious weeds that are threats to public land and sediment removal. Plant removal over time is beneficial, as some plants uptake pollutants in their roots and leaves (phytoremediation). The smaller neighborhood ponds require sediment removal based on capacity for accumulation (varies from 5-12 year lifecycle). Staff maintains larger regional facilities designed with forebays to capture large amounts of sediment annually. The inventory of rain gardens has grown significantly and represent the highest work load because they are managed three times/year (vegetation, overflow drain & scupper cleaning). Lastly, a smaller portion of annual hours are utilized for misc. stream vegetation/woody debris support work, off road system management, culvert checks/maintenance after storms is important for street safety and flood prevention.	Inspect pond facilities, rehab/remove sediment based on facility capacity. Maintain regional facilities and remove forebay sediment. Inspect 100% rain gardens/swales/ditches. Maintain vegetation and control weeds using Integrated Pest Management techniques. Remove sediment build up per SOP.	Sediment removal projected to be annually for rain gardens, and most swales and ditches. Annually/ongoing Sediment removal from approx. 2-5 ponds annually	Inspected all ditches and collected 4 cu yds from ditch cleaning. Inspected and conducted routine maintenance at 715 right-of-way stormwater planters (rain gardens). 20 cu yds of inlet and veg waste removed. Inspected 68 publicly maintained detention ponds and swales. Routine vegetation maintenance was completed at 65 of 73. Major maintenance was completed at 5 of these. 155 cu yds of sediment removed.
E. Maintain Grey Infrastructure*	Inspect and maintain underground (grey) structures. There are 500+ sedimentation manholes which are very cost effective for capture and removal of sediment. The inventory for these structures has grown significantly. There are 212 Flow Control Manholes (FCMH) inspected annually. There are 231 Detention lines that vary from 30' to 96' long. All were cleaned during this past permit cycle and most will not require cleaning for many years. There are 204 Detention manholes, which have minimal sumped areas and are of less water quality benefit. Follow SOP thresholds for determining sediment removal.	Inspect 100% of sedimentation/inlet MH Clean per SOP criteria Inspect 100% FCMH Clean per SOP criteria Inspect 50% Detention lines Clean per SOP criteria Inspect 50% Detention MH Clean per SOP criteria	Annual inspection; cleaning typically results in: Sediment removal from approx. 50-60 Sedimentation MH 25-35 FCMH over permit cycle Detention lines, if meets threshold 1-5 Detention MH annually	6,332 Total Hours: Sedimentation Manholes 125/500 cleaned; 33.6 yds debris remove. Flow control manholes 28/208 cleaned; 16.5 yds debris removed. Detention Line Cleaning: 22/238 cleaned; 6.2 yds debris removed. Detention manholes; 19/208 cleaned; 14.3 yds debris removed.
Stormwater Assets Maintenance Program (SMP) A-L. BMP Owner: Stormwater Operations & Maintenance Group, supported by GIS and Stormwater Science & Policy & Engineering				
Activity Name	Description	Measurable Goal	Timeframe	Reporting Metrics FY 24-25
F. Proprietary Devices (grey)	There are 133 Proprietary Devices with multiple filter cartridges (varies 1-12 per device) which are maintained at the frequency recommended by the manufacturer.	Inspect 100% of Proprietary Devices Clean based on Manufacturers threshold rec. (about 150-300 cartridges replaced/yr.)	Annual inspection, cleaning typically includes Sediment removal from about 50-60 proprietary devices annually	Black Boxes (CBs, manholes, vaults) 141 structures; 279 filter cartridges; 21.9 yds debris removed
G. System Repair & Maintenance*	Maintain and repair pipes, ditches, culverts, inlets, off road systems, etc. to ensure proper function and limit impacts to surface water, as well as underground injection control devices and appurtenances that drain to groundwater.	Maintain and repair based upon SOP criteria.	annually/ongoing	Inspection of new construcion/customer concern call hours: 884 Mapping Updates: 392 hours. High Frequency Areas 1,348 hours. Repairs & Maintenance: 2,679 hours. Utility Locates: 2065 hours
H. Spills, Illicit Discharge Investigation, Emergency Response*	Respond to community reports of spills or illegal dumping & emergency flood concerns. Investigate and/or assist with spill response, illicit discharge concerns, emergency stormwater controls for other department assistance, natural disaster response (flooding, downed trees, etc.)	Follow City Spill Response and Illicit Discharge Investigation procedures Conduct Spill Response all Department training and procedure review twice during the permit cycle	annually/ongoing	Emergency Response: 138 hours. Every emergency response involves a visual inspection of the nearby stormwater infrastructure to identify any contamination or deficiencies.

I. Construction Inspections and Plan Review, Resident Concerns (O&M)	O&M staff plan review and construction site inspections of connections to the public system.	Conduct reviews and inspections to ensure compliance with Code	annually/ongoing	General administration time includes staff time spent reviewing construction plan reviews and conducting new facility inspections 71 MyGresham online reports of drainage, flooding, vegetation, irrigation, and stormwater facility concerns were addressed in addition to spill/dumping response. 4,999 hours* *Also includes staff meetings, supervisory duties, and budgeting, taking equipment for repair or maintenance. Does not include assistance from Outreach, Enforcement, Parks, Water, or Transportation staff whom also support some investigations.
J. Good Housekeeping: O&M Yard*	Manage the Operation yard, shop, and equipment in cooperation with other city departments to clean up spills, keep sediment from entering drains. The yard has a covered decant station and equipment wash area to prevent pollutants from entering the stormwater system. Runoff from the yard also enters a stormwater facility prior to release to the stream.	Follow City best practices for storage, repair, dumping, washing, etc.	annually/ongoing	Shop duties: 260 hours
K. Underground Injection Controls (UICs) Maintenance & Cleaning*	Maintain the City's active UICs to ensure function and comply with the WPCF permit requirements.	Document and report maintenance and cleaning.	annually/ongoing	UICs cleaned and inspected 15/1005; 37 yds of debris removed.
L. Proper Waste Disposal (O&M)*	Ensure the debris collected from City O&M activities are handled and disposed of in a safe and responsible manner. The City has three locations that it can stockpile facility maintenance debris: Powell Loop, Hogan Building (Operations yard), and the Wastewater Treatment Plant. All debris is stored in a manner to prevent erosion and to dry out the debris to make the hauling more cost effective. Composite samples of debris from all types of activities are tested and are classified as "special waste" but not "hazardous." There are two facilities in the region approved to take special waste: Waste Management in Hillsboro and the Wasco County landfill in the Dalles. The City is currently contracted with Dietrich trucking to haul its debris to these facilities.	Follow City best practices for handling, storing, and disposing of O&M generated debris. Retain debris testing results per file retention standards	annually/ongoing	Debris is tested annually Dietrich trucking hauls to Wasco disposal facility Quantities disposed are reported per maintenance activity
Public Land Management (PLM A-E) BMP Owner: Water Resources Division				
Pollutants addressed	The BMPs within this section address both sediment control via soil stabilization restoration and also dissolved pollutants of concern via aiding infiltration, uptake, and evapotranspiration. These aid pollutant removal such as CO2 and sulfur compounds generated by vehicles and dissolving in water that can change pH. Pollutants of concern improved by infiltration include E.coli, mercury, copper and zinc. Some current use pesticides widely available for residential use such as glyphosate, dicamba, MCPP and 2,4-D readily dissolve in water and also benefit from landscape buffers and infiltration.			
Activity Name	Description	Measurable Goal	Timeframe	Reporting Metrics FY 24-25
A. Master Planning	In 2022, the City completed a City-wide Stormwater Master Plan that focused on pipe capacity limitations. The projects identified will become CIP expenditures over this permit cycle. In 24-25, the Watershed Engineering Team made substantial progress in the creation of a sub-basin plan (the Kelley Creek Watershed Master Plan) that identifies opportunities to address hydromodification, stream and floodplain improvements, and water quality and detention facilities through multiple-objective investments. An updated project list was also completed for the City's Natural Resources Master Plan which identifies and prioritizes stream, riparian, wetland, and floodplain improvement projects across the city.	Plan, design, and build CIPs.	annually/ongoing	This FY the City began working on a detailed basin master plan for the Kelley Creek Watershed, which is a tributary of Johnson Creek. The plan will integrate stream resiliency and upland stormwater management to address hydromodification in this urbanizing watershed where the creek has already been impacted by agriculture, logging, and rural residential development. The plan is expected to be adopted by city council in FY 25/26.
B. Water Quality Projects*	Stormwater infiltration or treatment is a component of City funded projects are required by the Stormwater Manual. Occasionally, the City also conducts projects in partnership with private development and/or grant funding. This BMP reports retrofit projects.	Implement Stormwater Manual requirements.	annually/ongoing	See Table 4.4 & 4.6

C. Integrated Pest Management*	Limit the number of pesticides and fertilizers from city operations by implementing an Integrated Pest Management Plan to manage public land.	Update the Plan at least once during the permit cycle. At least biennially discuss land management strategies with staff. Applicators are licensed and complete licensure renewal schedule.	Update goal: FY23-24	Facilities contracts with Relay Resources to manage City Building Properties Transportation has 1 applicator Wastewater has no applicators Stormwater has 6 applicators Water has 1 applicator Parks has 4 applicators Natural Resources has 2 applicators, but generally contracts these services See Table 4.8
Public Land Management (PLM A-E) BMP Owner: Multiple (As included in the Activity Description)				
Activity Name	Description	Measurable Goal	Timeframe	
D. Urban Canopy Program	This BMP is supported by Parks Planning staff and coordinated with other departments as needed. Enhance the urban canopy relative to Parks properties and street trees to support the City's Climate Action Plan.	Code enforcement of tree removal violations Annual replacement of dead/dying street trees Urban Forestry Committee (public participation)	annually/ongoing	Events/Plantings: ~120 trees planted, ~140 volunteers at Community Tree Planting Event West Gresham ~178 trees planted at Gradin Community Sports Park Black Earth Day Park to Park Tree Stroll: 45 community members learned about parks and urban forestry in Gresham. Fees for "in-leiu of" totaling \$2160 No tree violations reported
E. Natural Resource Program	The Watershed/Parks Departments and Natural Resources focus on enhancing & preserving the health of 688 acres or riparian area and 54 miles of stream corridors through restoration efforts reported here in tables 4.4 and 4.6	Implement NR CIPs Actively manage and restore on average ~100 acres/yr. Track volunteers and community organizations engaged.	annually/ongoing	See Table 4.4 for CIPs See Table 4.6 for Stewardship Activities
Pollution Prevention from City Activities (PPCA A-F) BMP Owner: Multiple as described in each Activity Description				
Activity Name	Description	Measurable Goal	Timeframe	Reporting Metrics FY 24-25
A. O&M for Public Roads, bridges: sweeping*	The City's Transportation Division oversees street sweeping and winter road safety measures and manages some of the vegetated right of ways following the Integrated Pest Management Plan. For road maintenance, staff follow ODOT's Standard Operating Procedure for Road Maintenance to limit impacts to stormwater and buffers.	Prioritize sweeping of arterial roads Conduct 8-10 sweeps/yr.	annually/ongoing	10 residential sweeps 12 arterial sweeps 6076 miles swept City additional routine/emergency sweeps and leafy season included 1422 hours 1833 tons of debris collected & disposed at Wasco landfill (city/contractor combined)

B. O&M for Public Roads, bridges: deicing	The Transportation Division oversees the application of winter road safety chemicals follows the City's Winter Road Plan to minimize risk to the environment while achieving safe driving conditions. The Winter Road Operating Plan is available on the City's website GreshamOregon.gov Transportation page	Remove winter road traction materials, as soon as practical post storm	annually/ongoing	~4,200 gallons of Magnesium Chloride used for anti/deicing on priority roads 178 cy of 1/4-10 sanding rock used 1 winter event
C. Limit Releases from Fire Training Activities	The Fire Department Training Center follows a procedure to implement storm drain protection during training activities that may result in runoff. The Stormwater staff support ongoing informational check-ins to update Fire on stormwater technology and research, as applicable.	Deploy storm drain protection techniques during training that cause runoff	annually/ongoing	Fire follows SOPs related to protecting the stormwater system at the training center.
D. Water Line Flushing	The Water Operations Division is responsible for minimizing impacts to the stormwater system by implementing an SOP for water line flushing, which involves using a dechlorination injector and applicable treatment chemicals. Staff deploy sweeping or drain protection to limit debris from entering the nearest stormdrains because of flushing.	Use of dechlorination	annually/ongoing	Staff conducted flushing of 726,193 gallons of water using the dechlorination SOP.
E. Limit Wastewater Pipe Seepage	The Wastewater Group is responsible for overseeing the system maintenance. This includes ongoing asset management with a CIP that repairs aging pipes that are more prone to seepage.	Implement wastewater pipe repairs as approved by the City budget.	annually/ongoing	Main line pipe replaced ~2780 linear feet Laterals replaced ~909 linear feet Manhole grouting 1 unit

Pollution Prevention from City Activities (PPCA A-F)
BMP Owner: Multiple Departments (O&M Yard Housekeeping overseen by Operations & Maintenance Department Managers)

Activity Name	Description	Measurable Goal	Timeframe	Reporting Metrics FY 24-25
F. Staff Training*	DEQ requests to understand how staff are trained or continue ongoing training as needed to oversee and/or conduct the work of their program areas. The City of Gresham provides a variety of professional development and industry specific training opportunities for staff to ensure safe and effective delivery of programs and services for the public's benefit. This includes internal and external trainings, as well as new staff orientation of programs, policies, and procedures. In many cases, staff are trained on equipment and procedures by senior staff where specific professional trainings are not readily available, such as business inspections.	Document staff trainings in required program areas for permit compliance. Train new staff on all good housekeeping procedures, chemical storage, stormdrain protection procedures for outdoor work and management of the Operations yard within six months of hire.	annually/ongoing	Transportation: 2 new staff trained on the sweeper truck and pesticide licensure edu credits: 1 staff Training of New staff on Housekeeping by Dept: Parks: 2 Transportation: 3 Stormwater: 1 Water: 4 Wastewater: 1

Public Reporting, Engagement, Outreach & Behavior Change (PREOB A-F)
BMP Owner: Multiple (As listed in each Activity Description)

A. Spills & Illicit Discharges & Public Reporting*	Coordination and oversight for this BMP is conducted by the Stormwater Science & Policy group. The City typically receives information about spills or unusual discharges in the following ways: phone calls to City Hall or Operations Dept, Code Enforcement voicemail hotline, email, or the My Gresham App (~7,000 concerns per year reported across all departments). Staff on or off duty may also report observations. Calls to Police Non-Emergency line are connected to the On-call after hours O&M staff, as applicable. For concerns that constitute threats to human health, welfare, or the environment, staff must respond within 24 hours or as soon as possible upon becoming aware (if delayed because of voicemail, weekend report, etc.) For all other types or concerns, respond within 1-4 days (average 2).	Document spill and illicit discharge reports and investigations and outcomes in City's database.	annually/ongoing	28 Incidences reported, 7 were residential, 9 vehicle related incidents, 6 were businesses, 6 were unknown sources 7 incidences resulted in no threat/nothing found/nothing to resolve 15 incidences included educational instructions to the responsible party(RP) regarding future expectations 9 incidences were cleaned up by the City with no RP or assisted the RP 6 incidents were taken care of by the RP or billed to the Responsible Party by the City for its cleanup work 2 incidences resulted in known releases to the stream. The Operations staff uses booms to absorb pollutants from streams or stormwater facilities to the maximum extent practicable. ~28 other concerns were reported thru MyGresham or calls to Operations Center that were primarily concerns about street drainage or blockage of inlets addressed by Operations staff or assisted by Outreach staff if related to a private property investigation and communication.
B. Litter/Hazardous Waste Control (Residents)*	The City's Solid Waste & Sustainability Division offers special collections events that vary by type and quantity over the permit cycle. The Division also oversees residential garbage, recycling, and yard debris hauling and used oil is collected at curbside and reported to the City. Examples include bulky waste, Styrofoam, or hazardous materials. The program also support permitted events occurring related to recycling collection such as the Farmer's Market and City Festivals.	Document events offered and supported. Track residential used oil collected by haulers	annually/ongoing	6.53 tons of electronic waste collected at Spring event. Free geek repair, reuse, recycler oversees best use and final disposal, as needed. Haulers reported collecting about 32.5 tons of used oil.
C. Business Outreach*	The Solid Waste & Sustainability Division offers outreach to businesses and apartments with services that help reduce litter and illegal dumping (includes stormdrain marking) and increase the recycling of materials and composting of food waste. The City also collaborates with EcoBiz to offer technical assistance to the Automotive sector to implement more sustainable and environmentally protective actions. Staff also conduct direct outreach via fact sheets, posters, and direct mail to specific key sectors periodically.	Document businesses and apartments served.	annually/ongoing	See Table 4.3
D. Schools and youth outreach*	The Stormwater & Natural Resource programs do not have enough staff to offer formal (planned/ongoing) curriculum to classrooms. However, staff occasionally teach classrooms or lead field trips, support camps or events, etc. and also partner with local watershed councils to deliver some services to Gresham youth. Staff believe that exposing youth to natural systems, science, local water resources and wildlife has the potential to have a lasting impact on their perception of the importance of pollution reduction actions they can take within their lives. <i>(See Stormwater Adaptive Management for change)</i>	Document staff activities to deliver water protection, nature & wildlife education & experiences to youth.	annually/ongoing	See Table 4.2
Public Reporting, Engagement, Outreach & Behavior Change (PREOB A-F) BMP Owner: Stormwater Science & Policy Group & City				
Activity Name	Description	Measurable Goal	Timeframe	Reporting Metrics FY 24-25

E. Regional adult outreach*	Because outreach is very labor intensive and advertising is so financially expensive, the Stormwater Program's approach is to invest a large portion of the budget and effort to leverage dollars and staffing using collaborative approaches to deliver stormwater pollutant reduction and water protection messaging to adults. Examples include a \$60K-\$70K annual Public Service Announcement campaign on television cost shared by 15+ agencies. Other campaign work includes the Metro area Regional Coalition for Clean Rivers and Streams, the Statewide Clean Rivers Coalition's "Follow the Water" and directed support of watershed council work to engage the public.	Educate key adult audiences as described in the E&O strategy with key pollutant reduction messages and positive actions they can take within their lives. Prioritize behavior change methods. Measure and evaluation, when possible.	annually/ongoing	See Table 4.2
F. Public Involvement & Participation: City outreach	The City uses a variety of communication channels to reach its residents which includes notification of public comment opportunities for City Plans, Budgets, Rates, Capital Projects, Events, etc. Examples include its website, print and electronic newsletter, social media, earned media etc. Staff also conduct outreach via direct mail to specific key audiences periodically (e.g., dog waste, RV dumping letters).	Utilize City channels to deliver 3-5 messages to residents	annually/ongoing	Facebook: 16.3K followers Instagram 5.8K followers YouTube: 1.5K followers E-news (digital): 1,420 subscribers (12X/yr) Gresham News (print): ~ 54,000 homes and businesses quarterly Next Door: ~30k members See also Table 4.2
Control Impacts from Development and Business Activities (CIDBA A-G) BMP Owner: Stormwater Science & Policy Group				
A. Stormwater Management Manual (SWMM)	This manual contains the regulatory development thresholds that necessitate stormwater controls, the prioritization of green infrastructure, the design standards, plan review process, and long term maintenance requirements.	Review SWMM at least once within the permit cycle. Update, if necessary	Review FY 24-25: Council approved	After more than a year of revisions incorporating internal and external stakeholders, including policy direction from city council, the updated SWMM was adopted by city council in May 2025 and became effective on June 1, 2025

B. Private Stormwater Facilities Tracking & Inspection*	The Stormwater group ensures proper installation, planting, and GIS mapping of private stormwater facilities required by the SWMM. The types of facilities installed and the catchment areas that drain to them are recorded for future pollutant reduction modeling and also to ensure the long-term maintenance and function as required by Gresham Code. Private facility owners are recorded in the City's database and property owners are made aware of their ownership and maintenance requirements. The City has a Private Stormwater Facility Handbook which is available on its website and is utilized to support private maintenance technical assistance. Staff have inspected all private facilities and required maintenance, as needed, historically. In the past few years, staff have categorized and prioritized the private inspection program based on available staffing time and overall potential impact to the public stormwater system from the facility based on adaptive management feedback loops on how long a facility's lifecycle has been observed over time. Facilities that treat stormwater prior to draining to groundwater or that infiltrate and don't flow to the City's public system are not part of the inspection program. Additionally, one Gresham neighborhood was built with on lot rain gardens with single family homes. These rain gardens are not inspected, but residents are given direct mail outreach on rain garden maintenance, at least once per permit cycle. Therefore, after the facility determination the criteria for inclusion is as follows: larger detention ponds are a higher priority (annual inspection) and other smaller facilities that have moderate potential for negative impacts will be inspected at least once every five years. <u>The current inventory is one larger private facility inspected annually (not including the 30 multiowner facilities already included in the City's public maintenance annual program) and 33 smaller ponds & smaller vegetated facilities and 60 proprietary device locations. Proprietary device owners must submit documentation that their devices are maintained or still clean every two years on a 50% inventory rotating basis.</u>	Document and inspect new private stormwater facilities and associated treatment areas. Conduct QA/QC of GIS recording of these facilities at least once per year Inspect major structural controls Oversee proprietary device maintenance	annually/ongoing	Gresham has 60 commercial or multi-family sites with proprietary underground vaults that are required to provide biennial documentation of inspection and maintenance. During FY 24-25 there were 2 sites that provided the required inspection and maintenance documentation. Due to staffing shortages, the city was not able to inspect and follow up with the other businesses during this reporting year. In FY 25-26, a new position was filled and this BMP enforcement and tracking is part of the new position.
C. Erosion Prevention & Sediment Control (EPSC) Plan*	The City's EPSC Manual was reviewed as part of the process for the updated SWMP. The Manual functions well for the EPSC Plan Review and Inspection Program needs. Staff attend industry specific trainings and stay attune to new technology developments that may provide additional program requirement updates or further the pollution reduction efficacy.	Review EPSC Manual at least once within the permit cycle. Update, if necessary	Goal for review FY 25-26	Revisions were made to the EPSC Manual as part of the SWMM revisions that were approved by city council and became effective on June 1. These changes can be found in the list of revisions in the updated SWMM at https://www.greshamoregon.gov/Watershed-Documents-and-Forms/#StormwaterManagementManual

D. EPSC Inspection Program & New (Post Construction) Stormwater Facility Inspections*	Stormwater Science & Policy staff coordinate with the City's Permit & Business Licensing Department staff for this BMP. Ensure development permitted within the City obtains a DEQ's 1200-C permit, when applicable and apply the City's EPSC Manual requirements to sites to ensure sediment laden runoff is not entering the City's stormwater system or waterways. The EPSC manual is provided to contractors during the permitting process. Contractors provide information to the City about which EPSC bmps will be utilized and the specific site locations for BMPs, as required. This information is available at all times to Public Works Inspectors and the Stormwater Science & Policy oversight group via a digital software permit system. At construction project final, staff inspect the site to ensure that all vegetated facilities are properly planted or hydroseeded, per SWMM requirements. Sites are checked to ensure underground facilities do not contain construction sediment and that bare soil is covered before protective storm drain filters can be removed.	Conduct active site inspections and QA/QC oversight as described in the SOP. Ensure large sites obtain a DEQ 1200-C permit. Assist DEQ with inspections if requested	annually/ongoing	A total of 296 construction sites were inspected. 282 single family sites, 5 commercial construction projects, 8 grading projects, and 1 multi-family sites. 25 total acres were disturbed for development. Three erosion control inspections are completed per site: a pre-construction inspection, and interim erosion control inspection, and a final erosion control inspection at the end of the project. There were 55 failed inspections requiring corrections for deficiencies such as installing/maintaining perimeter control, providing adequate cover for bare soil, protecting stockpiles, improving construction entrances, and sweeping streets. See Table 4.7 for facilities installed and inspected. A wet weather notice is provided at active fall construction sites as a reminder to prepare their site for fall rains. See Appendix A.
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Control Impacts from Development and Business Activities (CIDBA A-F)
BMP Owner: Stormwater Science & Policy Group

Activity Name	Description	Measurable Goal	Timeframe	Reporting Metrics FY 24-25
E. Business Screening & Inspection Program*	Implement the Business Inspection Program to address sectors that have high potential to contribute to stormwater pollution in runoff from their site. This program also includes the implementation of the Wellfield Protection Program and the Wastewater Fats, Oils, Grease (FOG) program. The City's Business Inspection program focuses on businesses with hazardous waste, manufacturing, outdoor storage that can cause stormwater pollution. Issue Notice of Violation if time frames for corrections are not met and enforce as needed to gain compliance.	Conduct routine and follow up inspections as described in the SOP, typically projected to be 100-200/year. Conduct screen of City's businesses for DEQ 1200Z permit evaluation, based upon industry types included by that permit. Review the City's new business list to determine additions to the program.	Screen all businesses for potential 1200-Z permit referral at least annually. Screen new businesses at least quarterly.	Total inspections/screenings/revisits; 509, including 388 auto, manufacturing, or industrial businesses and 121 food service businesses. There was 1 food service that the private storm drain was needing to be cleaned and serviced. Of the auto/manufacturing/industrial businesses with identified stormwater associated non-compliance corrections; 13 related to maintaining/repairing storm drains, 32 related to posting signage, and 48 related to secondary containment. See Appendix A for a list of businesses inspected by type, a list of 1200Z businesses in Gresham, and a list of 1200Z potential businesses. *A vast majority of 1200Z qualifying businesses have already been referred during this permit cycle or have been part of a focused effort from DEQ in the Columbia Slough Watershed to apply for a permit. Gresham staff are working to incorporate their current database to assist in the evaluation and referral of any future and current businesses to DEQ that would have the potential to need a 1200Z.

F. Private Storm Drain Maintenance Program*	The City created and has managed and reported efforts related to this program since 2004. Drain cleaning is an effective way to control stormwater pollution. Originally, it was strictly a voluntary outreach program called the Stormdrain Cleaning Assistance Program (SCAP), which resulted in cleaning 200-400 drains per year. During the last permit cycle, the Water Science staff began a focused effort with summer interns to update the City's private storm drain inventory in the GIS system. Drain conditions and levels of sediment were also recorded. This effort led to staff launching a mandatory drain cleaning notice for the drains full of debris as noted by the interns. This effort will continue during this permit cycle. Due to limited staffing levels related to this effort, staff will methodically select small portions of the city each year to request drain cleaning compliance documentation, in addition to continuing the SCAP program, which functions to lower the cost for cleaning to affordable rates for small businesses to participate.	Implement the SCAP program Select additive portions of the City's business areas to request drain cleaning documentation.	Offer SCAP annually Document drain cleaning for 10-20 non-SCAP participating businesses annually	378 businesses participated in SCAP ~1500 drains cleaned ~350 cy of debris removed
G. Retrofit/Hydromodification Assessment Update	City will provide an assessment of how the reports previously provided have been considered, updated, or implemented, remaining gaps of knowledge, if applicable, new goals, tools, priorities for future improvement.	Provide DEQ an assessment with outcomes related to the creation of the original reports.	Third year of the permit term (FY 22-23)	Submitted in PY 28 Report Appendix B.

Table 4.1.a Stormwater Program Adaptive Management Proposal

Public Reporting, Engagement, Outreach & Behavior Change (PREOB A-F)

Activity Name	Description	Measurable Goal	Timeframe
D. Schools and youth outreach	The Stormwater program offers formal (planned/ongoing) curriculum to classrooms. Staff teach classrooms and also partner with local watershed councils to deliver some services to Gresham youth. Staff believe that exposing youth to natural systems, science, local water resources, wildlife, and the effects of stormwater pollution has the potential to have a lasting impact on their perception of the importance of pollution reduction actions they can take within their lives.	Document staff activities to deliver water protection, nature & wildlife education & experiences to youth.	annually/ongoing

Table 4.2 Education & Outreach Programs

Programs with an emphasis on Residents

Program/Event and Partner(s)	Focused Watershed	Stats	Focus of Program/Event
Backyard Wildlife Habitat Home Visits (BHCP)	All	26 site visits in Gresham and 1 in Fairview: with 7 certifications and 1 recertification. BHCP staff engaged in 9 Gresham outreach activities. E-news: ~17,500 individuals Facebook: ~14k followers	Consultation visits with homeowners regarding qualifying for “Backyard Wildlife Habitat” status through a partnership with Bird Alliance of Oregon & The Columbia Land Trust; includes stormwater management, pesticide reduction, tree education among other things. Offer ongoing education and outreach with online resources.
Johnson Creek Watershed Council (JCWC)	Johnson Creek Watershed	Supports outreach: JCWC E-list to over 8K Gresham contacts: Instagram: ~2600 followers Facebook: ~3500 followers City supported 15 events that involved 130 adults and 801 youth and 382 volunteer hours.	Assists the City and Natural Resource Department with stream restoration, plantings, and invasive plant removal. Events include Dragon Fly Days, Amphibian egg mass surveying.
Columbia Slough Watershed Council (CSWC)	Fairview Creek & Columbia Slough	37 Classroom lessons and 25 Field Trips to the Columbia Slough Stormwater Facility, Wastewater Treatment Plant, Salish Ponds, and Southwest Community Park for Reynolds School Districts youth, serving	General education for school aged kids focusing on Title 1 Schools within the Columbia Slough Drainage Basin; offer areas of watershed protection, water science, native plants, wildlife, ecosystems, and stormwater pollutant treatment with vegetative facilities. Slough School

		Gresham and Fairview Grade 2-5 Students	
Regional Coalition for Clean Rivers and Streams.	All	Provide annual funding	A multi-agency collaboration using branded campaigns featuring monthly videos, digital advertising and organic posts that promote the work of local watershed councils and community volunteer events as well as tips and news articles that inform the public about action they can take to reduce pollution.
City of Gresham and Regional partners with KPTV- “It’s Our Water” Campaign	All	Clean Waters Campaign: www.kptv.com/water page was visited ~2500 times. 12 months of residential water protection messaging that aired 650 times over the year. Total impressions: ~12.5M (TV, social, web)	A multi-agency collaboration to contract with KPTV to include educational and informational snippets regarding car washing, water conservation, lawn care/watering, debris cleaning, water runoff, and being rain ready.
Follow the Water - Connect the Drops – What’s your Lawn Style?	All		A statewide collaboration campaign with Oregon State University Extension for building water protection culture and encouraging safe behaviors.
Public Involvement: City Website & Stormwater Pages	All	Dept. of Environmental Services Page: ~1100 annually, Water Resources: ~2100 (drinking water, stormwater, wastewater pages) Most Popular Stormwater/Watershed Webpages: Stormwater Docs: ~1300, SCAP: ~850, Volunteer/Education	The City Website provides information and resources to residents and businesses.

		Tours: ~400, Natural Resource Program: ~400, Groundwater: ~500	
Doggie Bag Distribution	All	Unknown	Doggie Bag Distribution Boxes are maintained and stocked at all City of Gresham Parks
Gresham and Fairview School Classroom Presentations	All	-6 Schools in three Districts -37 Classes -812 Students	In class presentations offered to Gresham and Fairview school districts. Focused on grades Kindergarten – 5 th Grade. Water Quality Presentation and “Who Dirtied the Water” Story and Visual Presentation.

Table 4.3 Education & Outreach Programs

Programs with an emphasis on Businesses

Program/Event and Partner(s)	Focused Watershed	Stats	Focus of Program/Event
City of Gresham Green Business E-Newsletter	All	6 issues/yr. ~1200 Subscribers.	Stormdrain Cleaning Assistance Program, General Best Practices, Hazardous Waste Training, Sustainability
City of Gresham Stormdrain Cleaning Assistance Program (SCAP)- offered to City of Fairview businesses	All	378 Business participated ~1524 drains cleaned. 346 yds of debris removed.	Implemented in the months leading up to Spring and Fall to offer businesses an affordable service through multiple vendors to clean private stormdrains. Outreach is done through emails, mailers, E-news; GreenBiz, City E-news, website, and social media
Green Biz Technical Assistance	All	555 total assisted 197 businesses are composting food waste 7 Green Business Evals; 2 newly certified.	A City run and operated program to assist businesses with leaks, spills, pollution prevention, drain maintenance, food grease, & green cleaners; offered in English and Spanish. Collaborated with Metro to promote Green Cleaners to the Latin Community and cultural grocery stores.
Drug Take Back Program	All	Unknown	City website provides resources and guidance to dispose of prescription drug disposal. https://www.greshamoregon.gov/residents/community-services/prescription-drug-disposal/
EcoBiz Program with Pollution Prevention Resource Center (PPRC)	All	Provided outreach to 49 Auto Businesses and 4 Landscape Businesses. 1 Business recertified (All About Automotive) and 1 Business was a new certification(Neyda's	The program provides technical assistance in recycling, energy, waste reduction, stormwater management and clean practices for automotive, landscape, and manufacturing businesses. Providing criteria and eventual certification and recertification.

		Landscaping Maintenance LLC)	
Multiple City Department Outreach; “Maintain your Private Stormdrain”	All	~150 multifamily complexes and businesses	Outreach material utilized by Solid Waste and Sustainability and Groundwater Protection Inspectors with businesses and multifamily homes to educate and inform the need and responsibility of their private stormdrains.

Table 4.4 Examples of City of Gresham Watershed/Natural Resource Program Projects with Water Quality Benefits

Project Name/Watershed	Watershed	Project Status	Stormwater Mitigation Measures/Area Treated	Funding Mechanism
<i>The City's Capital Projects Plan is located at: https://greshamoregon.gov/Capital-Improvement-Program/</i>				
Mt. Hood Community College Salmon Safe Campus	Sandy River Watershed: Kelly Creek / Beaver Creek	Add permeable asphalt to parking lots R, S, T, and U by their sports center. The removal of existing asphalt and replacement with porous asphalt is scheduled for late summer 2025, but during the past year, City staff developed the designs and bid documents for the college to put out for bid, and a contractor was successfully selected in the spring. The work needed to happen in early September to work with scheduled events at the college.	A summary of the amount of impervious area that is replaced, as well as the amount treated, will be provided next PY.	Metro awarded MHCC a \$260,000 grant that will be matched by \$265,000 matching staff time and funds from the City and EMSWCD
Riparian and adjacent upland planting	Willamette River Watershed: Johnson Creek, Butler Creek, Jenne Creek, and Kelley Creek; Sandy River Watershed: Kelly Creek and Burlingame Creek; Columbia River Watershed: Fairview Creek and Columbia Slough	Restoration of the riparian, wetland and immediately adjacent upland areas abutting creeks, floodplains, and wetlands. Willamette River Watershed: Johnson Creek (7 sites), Jenne Creek (1 site), Kelley Creek (3 sites), Butler Creek (3 sites). Sandy River Watershed: Kelly Creek (3 sites) and Burlingame Creek (1 site) Columbia River Watershed: Fairview Creek (2 sites) and Columbia Slough (1 site).	Water quality, stream shade, invasive control, forest health, stream function, wetland function, and habitat improvements.	Watershed (Natural Resources) Operating Fund: \$165K City Special Purpose "Tree Fund" (from development fees): \$90K
Invasive Weed Survey & Control	Willamette River Watershed: Johnson Creek and Jenne Butte	Active, ongoing invasive control. Early detection rapid response (EDRR) categorized or other invasive weeds are addressed as they are reported or discovered that could harm our infrastructure or customers.	Spot treatment for controlling aggressive invasive plant species that lead to bank failures, loss of native vegetation, reduce water quality and/or put our public at risk. Species including Japanese knotweed, Himalayan blackberry, purple loosestrife, English holly, English ivy, garlic mustard, hogweed, and yellow flag iris are some of the species addressed. See Gresham Invasive Species list for more information.	Collective public works annual contributions from the Operating Funds of Parks, Transportation, Stormwater, Wastewater, and Water. \$62.5K
In-stream and near-stream slope stabilization projects	Willamette River Watershed: Johnson Creek, Butler Creek, Jenne Creek, and Kelley Creek Sandy River Watershed: Kelly Creek and Burlingame Creek	Within the Johnson Creek Watershed , staff efforts were focused on (1) Planning, permitting, and contracting for stream stabilization on middle Nechacoke Creek @ Cleveland . Construction Summer 2025. (2) Hunter's Highland stream bank and outfall stabilization : field assessments and the start of design (alternatives analysis). Construction anticipated Summer 2026 or 2027. Kelly Watershed: (1) Kelly Creek along Greenway @ Powell . Following Greenway landslide repair in 22-23, the area closest to the landslide area had additional restoration (100 trees added this winter on floodplain terrace and at toe of slide repair). Overall Greenway along Wendy Court assessed for larger stream improvement/slope stabilization project. New concept plan added to City's Natural Resources Master Plan. (2) Kelly Creek along 16th @ Ironwood . Design and encroachment resolution for upcoming construction that will provide improvements to access of water quality features, bank stabilization, water quality plant community improvements	Water quality, riparian function, erosion control/preventing hydromodification	Watershed CIP funding: * Hunters Highlands Alternatives Analysis. * Kelly Creek along Greenway @ Powell * Kelly Creek along 16th @ Ironwood Wastewater CIP funding: * Nechacoke Stream Stabilization.
Local Roads Repair	All	The Transportation Division has embarked upon a deferred maintenance repair project that will last several years. The Utility Departments are collaborating to ensure pipes are inspected and repaired, if needed, prior to repaving work. This is protection of the rate payer's investment in infrastructure. This past year our work included: 615 lineal feet of stormwater pipe replaced 3,840 lineal feet of pipe was cured in place 19 stormdrains were replaced	Stormwater conveyance system updated	Watershed CIP funding \$747,000
Meadow Creek Rectification and Improvements Project	Willamette River Watershed: Johnson Creek Basin	Streambed improvements to Meadow Creek. Summer 2024 construction included removal of illegal fill; culvert outfall improvements; boulder placement, bank and habitat log structures, and seeding. Winter planting included installation of 1300 trees and 500 shrubs.	Stream improvements	Watershed CIP funding. \$125K
Chastain Creek Landfill Geophysical Evaluation	Willamette River Watershed: Johnson Creek Basin	Performed geophysical evaluation of historic landfill site and assessed the landfill's possible influence on water quality.	Water Quality	Watershed CIP funding

Rockwood Stormwater Tree Well Retrofits	Groundwater recharge area	Designed in-house. Construction planned for fall/winter 2025.	Stormwater tree well retrofits will provide water quality treatment for arterial roadway runoff and increase shade to reduce the urban heat island effect. This project will construct approx. 40 stormwater tree wells in the Rockwood neighborhood.	Design is funded by the City's Special Purpose funds. Construction funding anticipated by an awarded federal FEMA grant for \$380K
Powell Blvd. Stormwater Tree Well Retrofits	Willamette River Watershed: Johnson Creek Basin	In design phase.	Stormwater tree well retrofits will provide water quality treatment for arterial roadway runoff and increase shade to reduce the urban heat island effect. This project will construct approx. 50 stormwater tree wells on Powell Blvd. It is targeting removal of 6PPD-Q.	Design is funded by a 100% forgivable loan from Oregon DEQ state revolving loan fund. Construction will be funded by an Oregon DEQ OSG grant. Design contract is for up to \$95,000. Construction cost will be approx. \$500,000
Water Quality Facility Retrofits	Columbia River Watershed: Fairview Creek and Columbia Slough	The Fairview Creek Water Quality Facility was overhauled to remove sediment buildup over the years since it was first constructed in 2004, and soil was amended with material that will meet the most current water quality treatment standards. An additional forebay was constructed to assist in pretreatment to remove more sediment prior to water flowing into the treatment area.	With the removal of sediment that has built up, it increases the facility's capacity and by adding amended soil it will assist in the water quality of Fairview Creek and the Columbia Slough. The added forebay will now allow two sedimentation bays to assist in filtering out larger heavier debris, slowing the flow even further	Watershed CIP Funding: Fairview Creek Water Quality Facility improvements: \$355k Transportation CIP funding: Fairview Creek Water Quality Facility improvements: \$100k

Table 4.5: City of Gresham Water Resource Division Stormwater Budget Allocation (including staff and operating)		
Program Area	PY 29 Budget FY 24-25	PY 30 Budget FY 25-26 (Projected)
Water Quality: Policy Development Stormwater/Erosion Manual Oversight Permit Compliance Monitoring and Analysis Spill Response Public Education & Outreach Private Water Quality Facility Program Business Inspection & Enforcement Erosion Control Inspection & Enforcement TMDL Compliance Data QA/QC Training	\$ 1,238,305	\$ 1,276,733
Natural Resources: Restoration Encroachment Response Streambank Failure Response Capital Improvements Master Plan Updates Invasive Species Control TMDL Compliance Green Space Acquisition	\$ 854,942	\$ 992,378
Engineering: Capital Improvements Minor Drainage/Flood Control Public Works Standards Stormwater Manual Oversight Master Plan updates Mapping Stormwater Assets Management Training	\$887,262 \$12.11M CIP*	\$1,032,290 \$16.64M CIP*
Operations & Maintenance: Systems Maintenance & Repair Equipment Repair & Replacement Spill Response Inspection IMP implementation Mapping Training	\$ 4,945,551	\$ 5,525,285
Infrastructure Development (Development Engineering, Surveying, Public Works Inspections, Commercial Erosion Control Inspections)	\$ 453,500	\$ 527,000

City Admin Support, GIS Support, Management, Overhead	\$ 3,050,856	\$ 3,323,572
Total	\$11.43M Operating/Salary \$12.11M CIP (includes \$8.41M for FY23/24 projects still in progress)	\$12.68M Operating/Salary \$16.64M CIP (includes \$9.48M for FY24/25 projects still in progress)

Table 4.6 Restoration & Outreach Activities

Project Site	Creek Name	NRMP Reach	Project Partners	Volunteer Hours	Invasive Removal Acreage	Planting Acreage	Linear Stream (feet)	Plants Installed	Notes
Willamette River Basin									
Ochioto Site	Johnson Creek	CIP 913900; NRMP - JC14/15	Professional contractor and city staff	0	15	3.2	1,720	3,005	Site is in year 8 of a multi-year and multi-unit restoration. Site has several restoration units in different phases of restoration. This past years work focused on riparian and forest area plantings; removal of 1 acre of Himalayan blackberry monoculture by mechanical means; and herbicide treatments of invasive weeds.
Wisteria Site	Johnson Creek	CIP 913400; NRMP JC12/13	Professional contractor and city staff	0	1.2	0	370	0	Site is in 6th year restoration site along Johnson Creek. Site was previously a wisteria and Himalayan blackberry monoculture. Work done this past year included maintenance spraying of a broad list of invasive plant species.
7th Street Bridge Site	Johnson Creek	CIP 913200; NRMP JC08/JC09	Professional contractor, city staff, and volunteers from JCWC and community	144	12.5	6.7	2,095	12,950	Site is in year 4 of a multi-year and multi-unit restoration. Site has several restoration units in different phases of restoration. Site conditions prior to restoration was predominantly a monoculture of Himalayan blackberry. This past year work included removal and herbicide treatment of 2.9 acres of blackberry monoculture; herbicide treatment of a broad list of invasive weeds over the 12.5 acres; and planting of native shrubs and trees over 6.7 acres. Volunteer work was done in partnership with JCWC. A total of 3 events were held this past year at the site. It included a planting event and 2 mulching events. A total of 48 volunteers worked 144 hours.
Main City Park Site	Johnson Creek	CIP 9JC009; NRMP JC09	Professional contractor and City staff	0	3.2	1.2	3,125	800	Site is in its 3rd year of a multi-unit and multi-year restoration. Site has several restoration units in different phases of restoration. Baseline conditions was a mixture of degraded riparian area and monocultures of Himalayan blackberry and English ivy. Work this past year included removal and herbicide treatment of 1.7 acres of blackberry and English ivy; herbicide treatment of a broad list of invasives over the 3.6 acres; and native plantings, over 1.2 acres, of trees and shrubs and emergent wetland species.
Miller Creek Site	Miller Creek	NRMP - MIL01	Professional contractor and city staff	0	5	5	2,150	300	Site is in 4th year of restoration. Baseline conditions prior to restoration was a good overstory of big leaf maple with spots of Himalayan blackberry, English holly, and reed canary grass. This past years work included maintenance herbicide treatments for a broad list of invasive species and native planting of trees. Native plantings were concentrated next to Miller Creek.

7th Street Bridge Site (Grant Funded)	Johnson Creek	CIP 913200; NRMP JC08/JC0 9	Professional contractors, city staff, volunteers and JCWC staff	24	2.6	2.6	1,152	1,500	JCWC in partnership with City of Gresham started work on this site in 2021. They used a grant from EPA and a City match (10K) to complete the work on the site (year 2). Site conditions prior to restoration was a monoculture of Himalayan blackberry and reed canary grass. This past years work focused on herbicide treatments of a broad list of invasive weeds and native plants of trees and shrubs. A single volunteer/education event was done through JCWC where they installed live stakes of willow species along the creek.
Butler Creek Corridor Site	Butler Creek	NRMP - BC01, BC02, BC03	Professional contractor and city staff	0	20.1	1	3,550	250	Site is in its first year of a multi-year and multi-unit restoration. Site has several restoration units in different phases of restoration along the entirety of Butler Creek. This past years work focused on riparian and forest area plantings at a small area around Marpol Pond and herbicide treatments for a broad list of invasive weeds through the 20.1 acres.
Jenne Butte (Johnson Creek) Site	Johnson Creek	NRMP - JC01	Professional contractor and city staff	0	31	0	0	0	Site is in year 2 of a multi-year treatment of garlic mustard. This past year the site had herbicide treatment to control garlic mustard over the 31 acres.
Jenne Butte (Johnson Creek) Site	Johnson Creek	NRMAP - JC01	Mount Hood Community College Ecology students and city staff	60	3	3	0	0	City provide outreach to students at Mount Hood Community College, Ecology class. Activities included a nature walk on Jenne Butte and removal of garlic mustard by hand. A total of 40 students spent 2 days learning about plants and more specially about the invasive weed garlic mustard. As part of this outreach students hand pulled garlic mustard around the butte.
Gresham Woods Site	Johnson Creek	NRMP - JC04	Professional contractor and city staff	0	41	41	3,450	2,000	Site is in year 2 of a multi-year and multi-unit restoration. Site has several restoration units in different phases of restoration. Gresham Woods (38 acres on north bank over 3 parcels) is a series of large parcels along the north bank of Johnson Creek. Site was initially restored 20+ years ago. Site conditions require additional restoration efforts. Baseline conditions include several large areas of red alder die off; extremely dense evergreen forest stands; large patches of dense English holly, English ivy, Himalayan blackberry and reed canary grass. This past years effort included removal and herbicide treatment of 4 acres of English holly; herbicide treatment of a 3 acre patch of English ivy; removal and herbicide treatment of 1 acre of Himalayan blackberry; and herbicide treatments for a broad list of invasive weeds over the 41 acres. Along with invasive herbicide treatments the city planted 2000 bare root trees spread out across 41 acres and completed stand enhancement in 4 dense units of evergreen trees.

McKinley Trunk Project Site; Jenne Creek headwaters	Jenne Creek	CIP PVJE01; NRMP - JE01	Professional contractor and city staff	0	12	4	1,170	2,300	Site underwent infrastructure development in 2018-2019 with a wastewater pipeline being installed within the area. A new wastewater pipe was installed that resulted in the impact of 4.0 acres of riparian and upland forest and emergent and scrub/shrub wetland area. Site is in the 4th year of a 5 year restoration plan. This past years work included herbicide treatments for a broad list of invasive species and planting native wetland, riparian and upland trees and shrubs. An Additional 8 acres of wetland adjacent to the wastewater pipeline alignment is in long-term invasive weed species maintenance and utilizes NR operating funds.
Brookside Development Site	Kelley Creek	CIP KCHKE07; NRMP - KE07	Professional contractor and city staff	0	8	8	1,150	7,750	Site is in its 6th year of a multi-unit and multi-year restoration. Funding for this project is supported by Development Permit fees for mitigation of Natural Resource Overlay impact area. Two separate units are under restoration. The first unit is in year 6 and has entered the maintenance phase for invasive weed species and small scale pocket planting. The second unit is in its 2nd year of restoration. Work in this unit included herbicide treatments for a broad list of invasive weeds and planting of native shrubs and trees.
Meadow Creek Headwater Area	Meadow Creek	NRMP - CH05, CH03, GB01	Professional contractor and city staff	0	4.2	4.2	725	3,500	Using funds provided by the City Tree Fund the city is in year 2 of a multi-year restoration in the Meadow Creek headwater area. This area had a large die-off of red alder that resulted in the formation of a monoculture of Himalayan blackberry. Work completed at this site included a 2 acre cut of blackberry, herbicide treatments for a broad list of invasive weeds and planting of native shrubs and trees.
Chastain Creek Headwater Area	Chastain Creek	NRMP - CH05, CH03, GB01	Professional contractor and city staff	0	2.8	2.8	620	3,500	Using funds provided by the City Tree Fund the city is in year 2 of a multi-year restoration in the Chastain Creek headwater area. This area had a large die-off of red alder that resulted in the formation of a monoculture of Himalayan blackberry. Work completed at this site included a 0.5 acre cut of blackberry, herbicide treatments for a broad list of invasive weeds and planting of native shrubs and trees.

Hogan Butte Nature Park - Volunteer Events	NA	NA	City staff and student volunteers	588	1	1	0	250	School outreach this past year included Powell Valley Elementary and Springwater Trail High School. The city hosted 2 days of outdoor classroom activities for a 5th grade classroom's (46 students; 9 adults) from Powell Valley. Activities at the park included an nature education walk around the butte, cutting and planting live stakes, stormwater facility education, weeding, and laying mulch. Springwater Trail High School (127 students; 14 staff members) have been doing an annual volunteer day with the city for 5 years. This year's event was held at Hogan Butte Nature Park. Activities included a nature education walk, planting of native plants, and weeding and mulching.
Columbia Slough Basin									
Columbia Slough Water Quality Facility	Columbia Slough	NRMP - CS08	Professional contractor and city staff	0	14.8	0	155	0	Site is a regional water quality facility. Site maintenance is ongoing for invasive weeds. Invasive weed control in facility will help water quality treatment and overall site conditions.
Columbia Slough Wastewater Parcel	Columbia Slough	NRMP - CS06	Professional crew, CSWC, PGE Project Zero Interns		12.5	1.8	1,090	2,200	Site is in its 2nd year of a multi-year restoration. Baseline condition was a mowed agriculture area along the south bank of the Columbia Slough. City is restoring a 50-foot corridor next to the Columbia Slough. Work this past year included herbicide treatments for a broad list of invasive species and native planting of shrubs and trees. Additional spraying was completed on the north side of the Columbia slough to control Himalayan blackberry. This area will not be planted.
Fairview Creek Regional Water Quality Facility	Fairview Creek	NRMP - FC05	Professional contractor and city staff	0	9	0	0	0	Site is a regional water quality facility. Site maintenance is ongoing for invasive weeds. Invasive weed control in facility will help water quality treatment and overall site conditions.
Fairview Creek Wetland Mitigation on Birdsdale/202nd	Fairview Creek	NRMP - FC05	Professional contractor and city staff	0	8.5	0	1,470	0	Site maintenance of invasive weeds on a compensatory wetland mitigation site. Species sprayed for include reed canary grass, Himalayan blackberry, Japanese knotweed, ivy, thistle species, teasel, and poison hemlock.

Fairview Creek Headwater Wetlands	Fairview Creek	CIP 9FC006; NRMP FC06	Professional contractors, city staff, RLA students	585	7.5	1	1,050	1,500	Site is part of an ongoing restoration of a 40 acre wetland complex. Restoration maintenance has been ongoing since 2006 following a \$750K floodplain wetland improvement project. Site work consists of spreading clean leaf mulch and live staking through it to reduce reed canary grass growth. Follow treatments using herbicide to control reed canary grass and Himalayan blackberry. Site work also includes spot spraying of an area called the turtle moat to promote nesting of Western painted turtle. Large portion of work is done with partnership with Reynold's Learning Academy which provides a work program for high school students. Work they did included mulching, planting of live stakes, cutting blackberry and reed canary grass, and placement of tree protection.
Clear Creek Middle School	Clear Creek	NRMP CC1	Natural Resource staff, student and teacher volunteers, PGE volunteers and CSWC	150	3	1	620	200	Clear Creek Middle School in partnership with the City of Gresham, PGE, and Columbia Slough Watershed council is restoring a compensatory wetland mitigation site on it campus. Work this past year included nature education for students, planting of native shrubs and trees, mulching, and invasive species removal using hand tools.
Sandy River Basin									
Ironwood/Salquist Site	Kelly Creek	NRMP - KC15	Professional contractor and city staff	0	7.5	3.5	1,825	4,250	Site is in its 3rd year of a multi-year restoration of 7.5 acres of riparian and upland forest and emergent wetland. Site has several restoration units in different phases of restoration. This past years work focused on riparian and forest area plantings of native shrubs and trees; removal of 1.2 acre of Himalayan blackberry by mechanical means; and herbicide treatments of invasive weeds.
Kane Road Site	Kelly Creek	NRMP - KC01	Professional contractor and city staff	0	1.5	0.5	640	350	Restoration activity at this location resulted from a CIP transportation/stormwater project to completed the repair & restoration from an emergency road washout in 2015. Site is in its 5th and final year of restoration. Site was planted with shrubs and trees and live stakes. Invasive weeds included reed canary grass, Himalayan blackberry, English ivy, and Scotch broom. Site planting and herbicide treatment completed by contractor.
Palmquist Culvert Site	Burlingame Creek	NRMP-BUR04	Professional contractor and city staff	0	1	1	685	500	Restoration activity at this location resulted from a CIP transportation/stormwater project to replace existing culvert in 2020. Site is in its 3rd year of restoration. Work this past year included herbicide treatment for a broad list of invasive plant species and native planting of shrubs and trees.

Kelly Creek Water Quality Facility	Kelly Creek	NRMP - KC12	Professional contractor and city staff	0	9	0	750	0	Site maintenance is ongoing on invasive weeds at this regional water quality facility. Invasive weed control in facility will help water quality treatment and overall site conditions.
Gresham Meadowlands Wetland Preserve	Burlingame Creek	adjacent to NRMP-BUR04	Professional contractor and city staff	0	2	0	0	0	Site done in partnership with The Wetland Conservancy to restore wetland area. Site is in its 4th and final year of restoration. Site work this past year included herbicide treatment for a broad list of invasive species.
Total				1,551	238.9	92.5	29,562	45,605	
CIP = Capital Improvement Program									
CSWC = Columbia Slough Watershed Council									
EMSWCD = East Multnomah Soil & Water Conservation District									
RLA = Reynold's Learning Academy									
JCWC = Johnson Creek Watershed Council									
**All spraying was completed by a hired (licensed) City contractor and not included in volunteer hours.									

Table 4.7 Total New and Redevelopment Acreage

Project Name	Land Use Type	Development Type	Location	WQ Treatment	Ownership	System	Project Size/Area Treated (acres)	Construction Disturbance (acres)	Percent Impervious
Arts Plaza Apartments	Downtown Commercial Core	Multi Family	NE Kelly Ave and NE 2nd St	2 Streetside Stormwater Planters and ADS Baysaver Water Quality CRe	Private and Public	Johnson Creek	0.88	0.97	91%
Beaver Creek Meadows Subdivision	Low Density Residential	Single Family Residential	SE 2nd St and SE Acacia St	9 Streetside Stormwater Planters and 2 Detention Ponds	Public	Beaver Creek and Kelly Creek	1.99	3.40	59%
Blue Pearl Phase 2 Subdivision	Low Density Residential	Single Family Residential	SE Lusted Rd and SE 282nd Ave	19 Streetside Stormwater Planters and 1 Detention Pond	Public	Beaver Creek	5.40	9.90	55%
Bryn Mawr Subdivision	Low Density Residential	Single Family Residential	West Powell Blvd	18 Streetside Stormwater Planters and 1 Detention Pond	Public	Fairview Creek	2.55	3.79	67%
Cedar Tree Apartments	Commercial Multi Family	Multi Family	NE 162nd Ave	1 Infiltration Swale and 2 Streetside Stormwater Planters	Private and Public	Columbia Slough	0.52	0.68	76%
La Plaza Esperanza	Moderate Commercial	Commercial	SE Oak St	1 Infiltration Planter Box and 1 Streetside Stormwater Planter	Private and Public	Columbia Slough	0.57	0.68	84%
Portland Portal 3 Distribution Warehouse	General Industrial	Industrial	NE Sandy Blvd	2 Contech StormFilter Vault	Private	Columbia Slough	10.20	12.90	79%
Grainger	General Industrial	Industrial	NE Hogan Dr	Extended Wet Detention Pond	Private	Fairview Creek	37.40	48.50	77%
School District Health Clinic	Downtown Residential Low Rise	Commercial	N Main Ave	2 Infiltration Rain Gardens	Private	Fairview Creek	0.24	0.43	56%
Sunset Village Phase 2 Subdivision	Moderate Density Residential	Single Family Residential	SE 190th Dr	51 Streetside Stormwater Planters	Public	Kelley Creek	11.62	18.70	62%
US Market	Corridor Mixed Use	Commercial	SE Division St	1 Swale	Private	Columbia Slough	0.36	0.45	80%
West Powell Apartments	Downtown Commercial Core	Multi Family	W Powell Blvd	2 Stormwater Planters	Private	Johnson Creek	0.80	0.90	89%
Total Disturbed Acreage								101.30	

*Public ownership is City of Gresham only. Private refers to all projects owned by entities other than City of Gresham.

**Table 4.8 Integrated Pest Management Program
(Pesticide/Fertilizer Applications)**

Department	Product Utilized	Quantity	
Facilities Maintenance	Ranger Pro (glyphosate)	62	oz.
	Weed Zap (clove oil, cinnamon oil)	192	oz.
	Scythe (pelargonic acid)	134	oz.
	Pronto (imazapyr)	2	oz.
	Crew (dithiopyr, isoxaben)	55	lbs.
	Casoron 4G (dichlobenil)	35	lbs.
	Spray on Blue (non-toxic blue dye)	2	oz.
	Spray 007 (surfactant adjuvant)	47	oz.
	Spray-Wet (surfactant adjuvant)	1.5	oz.
	Spray-Rite (spray adjuvant)	8	oz.
	Spreader Sticker (wetting agent adjuvant)	5	oz.
Transportation	Gallery (isoxaben)	91	oz.
	Round up (glyphosate)	494	oz.
Watershed	Rodeo (glyphosate)	181	oz.
	Garlon 3A (triclopyr)	6	oz.
Natural Resource Program	Aquaneat (glyphosate)	2,603	oz.
	Element 3A (triclopyr)	801	oz.
	Vastlan (triclopyr)	2,590	oz.
	Garlon 3A (triclopyr)	1877	oz.
	Copperhead (imazapyr)	1	oz.
	Agridex (surfactant adjuvant)	1,935	oz.
	Competitor (surfactant adjuvant)	1,000	oz.
	Hi-Light (blue dye)	1,500	oz.
Water	Roundup pro (glyphosate)	112	oz.
	SureGuard (flumioxazin)	14	oz.
Parks	Roundup Power Max (glyphosate)	225	oz.
	Ranger Pro (glyphosate)	15	oz.
	Crossbow (2,4-D and Triclopyr)	20	oz.
	Scythe (pelargonic acid)	40	oz.
	Dimension 40W (dithiopyr)	25	lbs.
	Casoron 4G (dichlobenil)	95	lbs.
	Signature Weed and Feed (2,4D, MCPP-p and Dicamba)	2,750	lbs.
		liquid totals	9,641 oz (75.3 gallons)
			minus adjuvants and dyes
		dry totals	2,960 lbs

Appendix A:

List of Businesses Inspected by Type		
Automotive	Industrial/Manufacturing	Food Service Businesses
Ed's Exhaust & Automotive	Advance Auto Parts	3 Reyes Restaurant
181ST SHELL GAS CORPORATION	Albertsons Distribution Center #8252	7 Eleven Store #2352-23007E
3C Automotive Repair	Arch Fitters	7 Eleven Store #2353-16619D
76 fuel - 7 eleven	ARPO, LLC & ROCKET #5456	7 Eleven Store #2353-17033C
76 of Gresham	Ashby Machine & Hydraulics Llc	7 Eleven Store #2353-21907D
76 of Gresham	B & B Laundromat	7 Eleven Store #2353-25364C
76 Station	Bakemark	7 Eleven Store #35340A
A & M Auto Care	Barnhart	Annie's Restaurant
A to Z Auto Wrecking	Boeing of Portland	Applebees Neighborhood Grill and Bar
Advanced Transmission & Gear	Britton Excavating Llc	Avamere at Chestnut Lane
All About Automotive	Bud Bellamy & Son Inc	Baja Fresh Mexican Grill #102
American Honda Motor Co Inc.	CAG LOG - Colorcentric Corp - FUJI Film	Big Town Hero
Auto Firm NW	Calef Machine Tool	Black Bear Diner
Auto Plus Auto Parts	Cardinal Health at Home	Black Rock Coffee - 182nd
Auto Repair Specialties	Cascade Athletic Club	Black Rock Coffee - Burnside
Autozone #3755	Cedarsource Manufacturing Inc	Black Rock Coffee - Stark
Bickmore Auto Sales - Powell	Celestica	Bon Teriyaki
Bon Motors	Clean Machine Coin Op	Burger King #7759
Bridgestone Firestone	Comfort Connection	Burgerville
CascadeGerman Parts, Inc.	Connor Manufacturing	Cafe Delirium
CENTRAL AUTO BODY, LLC	D6 Inc	Caffeinated Culture Coffee Co - Burnside
Chevron Service Station	Die Master	Caffeinated Culture Coffee Co - Division
Chevron Station #1001	Don's Machine Shop	Cascade Athletic Club
Classic Collision	EAGLE STRIPING SERVICES SHOP	Chinese Garden Restaurant and Lounge
Cleveland Auto Repair	Eastside Paving Inc	Circle K (My Goods Market)
Daytona Transmission	Enviro Clean Equipment Inc	Cold Stone Creamery #313
E & B Motors	Evergreen Transportation	Dairy Queen
Epic Auto Detailing	Everyday Deals Wholesale	Dea's In and Out Inc
Firestone	EXEL, INC & DHL SUPPLY CHAIN	Diamond Darcy's
First Student	Fire Station 73 - Pleasant View	Dominos Pizza
Fix 4 Less Auto Repair	Fred Meyer	Dominos Pizza #7243
Fleet Services	Fred's Auto Removal	Don Ladis Taco Shop
FUEL MART, LLC & SPACE AGE	Frito Lay Sales LP	Dottys #013

Gerber Collision & Glass	GCC (formerly Valin)	Dottys #18
Gills Tire Service	Georgia Pacific	Dottys #23
Gonyea's Automotive	Graphic Packaging Int'l Inc	Dotty's #32
Gresham Automotive Services LLC	Gresham AM/PM	Dottys #38
Gresham B & P Auto	Gresham Custom Upholstery	Dottys Deli #002
Gresham Chrysler Dodge Inc	Gresham Outlook Publishing	Dutch Bros - Burnside
Gresham City Motors LLC	Gresham Roofing & Construction	El Indio II
Gresham Ford	Gresham Sanitary Service	El Indio's Mexican Restaurant
Gresham Muffler	Heritage Crystal Clean	El Jefe Birria and Tacos
Gresham Powersports LLC	Highvac Corporation	Elmer's
Gresham Subaru	Hood Center Cleaners	Elmer's Colonial Pancake House
Gresham Toyota	Hydrofarm, Llc	Genos Grill
Gresham Transmission	In & Out Market	Giuseppe's
Guerrero Auto Repair	Interlaken Inc	Gresham Burrito Shop
Hertz Auto Sales	Interlaken-Eastwood	Gresham Grocery Outlet
HK Motorsports	JW Underground	Hogan Market
Honest 1 Auto Care	Key Mechanical Co	Irish Bros Coffee
Jiffy Lube of Gresham	Knights Transportation	Izobilie Euro Foods Llc
JK Autobody	Kts Inc	Jack in the Box #7112
John's Affordable Auto Repair	Lipman-Portland Llc	Jack in the Box #7168
Jose's Road Service LLC	Lyft Fitness	Jacksons Food Stores #509
Jubitx Corporation	McDonald and Wetle Inc	Jazzy Bagel
Juston Olesen's Competition Paint LLC	Microchip Technology Inc	Joy Teriyaki - 181st
Leathers Oil Co	Migration Brewing	Joy Teriyaki - Eastman
Leathers Oil Co	Miller Paint Company Inc	Joy Teriyaki - Park
Leathers Shell #18	Minuteman Press Of Gresham	Kc's Smoke And Vape
Leo Auto Services	Moen Machinery Co	La Tienda De Guadalupe
Lewis Automotive Inc	Mt Hood Medical Center	Lee's Garden Chinese Restaurant
LOMELI AUTO REPAIR & SALES INC	No 1 Usa Dry Cleaners	Legal Addiction Espresso 2
Lomeli Gresham Radiator	Nolen's Cabinets & Countertops	Lighthouse Deli - Burnside
Magic City Garage	Operations Center - City of Gresham	Little Friends Day School
Mark's Point S Tire	Operations Center-Parks Red Barn	Little Manuel Church and Child Care
Master Tech Automotive Inc	Operations Center-Sewer	Lydia's Restaurant and Lounge
Midas Muffler Shop	Operations Center-Storm	Maddys
Mountain View Auto Body	Operations Center-Water	McDonalds #23016
One Fine Mechanic	OPERATIONS MGMT INT'L INC	McDonalds #8050
OREGON AUTO AND TIRE SHOP LLC	Oregon International Air	Meals on Wheels - Gresham Senior Center
O'Reilly Auto Parts #2514	Owens Corning Foam	Meeka Japanese Restaurant

O'Reilly Auto Parts #3542	Pacific Air Compressors	Mi Pueblo Taqueria #2
Orient Auto Service Inc	Pacific Magnet Inc	Oh Yeah Beer and Snacks / Lux Bar and Grill
Outside Van - Sandy	PacWest Machinery	Olive Garden #1351
Petrocard	Performance Food Group Inc	Oregon International Market
Purcell Tire NW Inc	Plaid Pantry #80	Panda Express - Civic
Referral Automotive	Portland Food Mart llc.	Persimmon Country Club
Revolucion Autobody llc	Portland General Electric	Pho.com
Ron Tonkin Hyundai DBA RTL-M I	Portland Rock & Landscape Supply	Pizza Hut
RYAN'S AUTO REPAIR INC	Pro Met Machining	Plaid Pantry #132
Safeway Fuel Station #1070	Pruett Enterprises LLC	Plaid Pantry #145
SANTANA AUTO REPAIR	Quality Harvest Foods Corporation	Plaid Pantry #163
Signature Automotive	Raymond Handling Concepts Corp	Plaid Pantry #231
Space Age #9 (AKV Mart)	Ray's Custom Services	Polar King Restaurant
Space Age Fuel #8	Reliable Contents Services	Pub 181
Sprinterpost	Restorations & Reproductions	Red Robin Restaurant
Superior Auto Body	Rockwood Corporate Center Lot 4	Regal Cinemas
Thomas Auto Repair	Rockwood Water	Richard's Deli
Trans Medic Transmissions Inc	Rodda Paint	ROCKWOOD LOUNGE
U-Haul Co Of Oregon - Hogan	Royal Bearing	Round Table Pizza
Valvoline Instant Oil Change	Sherwin Williams	Shari's of Halsey Crossing
Vo's Auto Repair Inc	Signs and Wonders	Sidekicks Deli - 181st
Washman Car Wash	Sinclair and Rush INC	Solista Gresham
Xpress Tire & Auto Service	Speedy Bright Dry Cleaners	Soy Grill
Zoom Transportation	Stereo King Oregon Inc	Srisiamchai Thai Restaurant
	Superior Tape & Label	Starbucks Coffee #10291
	Technical Fabricators	Starbucks Coffee #3405
	Tri Coat Painting Inc	Starbucks Coffee #483
	WESTSIDE POWERSPORTS	Stark Street Market
	Xpo Logistics Supply Chain, Inc	Stomping Grounds Coffee House - Halsey
	Yeon Building Multnomah County - Facilities and Property Management	Subway #36856 - 181st
	Zghoul AM PM	SUSHI EDO GRESHAM INC
	Ziply	Sushiville
		Taqueria Mi Jalisco
		Taqueria Santa Cruz
		The Annex
		Tienda Nohbec
		Tin Tin Buffet
		Try Me Ethiopian Restaurant
		Uly's Taco Shack

US Chef Store
Us Market #175 Llc
Vi Thai Inc
Walmart #2927
Wendy's - 181st
Whites Country Meats
Winco Foods #47
Wooden Fish Parents First
Yami Sushi & Teriyaki
Zwe Ka Bin Grocery Llc

1200Z Permitted Businesses in Gresham			
Business	1200Z No Exposure	1200Z Stormwater	
Arnprior Aerospace Portland		X	
Albertsons Distribution Center		X	
Boeing of Portland		X	
Bridgestone	X		
Cascade Corporation		X	
City of Gresham WWTP		X	
Columbia Brick-Mutual Materials		X	
Dateline Exports Warehouse		X	
Denton Plastics Inc		X	
First Student		X	
Frito Lay Sales LP		X	
Hawthorne Hydroponics		X	
HMF Express - A Senneca Holdings Co.	X		
International Paper Company		X	
McDonald and Wetle Inc		X	
Microchip Technology	X	X	
Mutual Materials Co Inc		X	
Owens Corning Foam		X	
Pape Machinery Inc		X	
Pella Vinyl Portland Operation		X	
Performance Food Services		X	
Pioneer Sheet Metal		X	
Portland Container		X	

Portland Specialty Baking		X
Purcell Tire NW Inc		X
Quality Harvest Foods Corporation		X
R.S. Davis		X
R2M2 Rebar and Stressing		X
Ricks Custom Fencing		X
Scenic Fruit Company		X
Shamrock Foods		X
Trimet Ruby Junction Rail Maintenance Facilities		X
Westech Construction		X

List of Potential 1200Z Permit Businesses Referred to DEQ

Business Name	Address	Classification
Britton Excavating	1223 NW Eastwood Ave, Gresham OR 97030	Excavation
Cantel Sweeping	1709 NW Eleven Mile Ave, Gresham OR 97030	Property Maintenance/sweeping
Gresham Sanitary Service	1231 NW Birdsedale Ave, Gresham OR 97030	Garbage Collection
Lineage	19450 NE San Rafael St, Portland OR 97230	Cold Storage/Freight Transportation
McAra Machining	2271 NE 194th Ave, Portland, OR 97230	Machining
Moen Machinery	268 NE Hogan Dr, Gresham OR 97030	Equipment Sales/Service
Northwest Handling Solutions	18008 NE Airport Way, Portland OR 97230	Equipment Service
Organically Grown Company	20078 NE Sandy Blvd, Portland OR 97230	Cold Storage/Distribution
Outside Van	18943 NE Sandy Blvd, Portland OR 97230	Vehicle Custom Manufacturing/Sales
PacWest Machinery	19255 NE Sandy Blvd, Portland OR 97230	Industrial Machine Service/Sales
Parr Lumber	18608 SE Stark St, Portland OR 97233	Wood/Material Distribution
Seko Logistics	17949 NE Sandy Blvd, Portland OR 97230	Freight/Distribution
Weston Buick GMC	22555 SE Stark St, Gresham OR 97030	Auto Sales/Service
Weston Kia	22309 SE Stark St, Gresham OR 97030	Auto Sales/Service

Appendix B: TMDL Annual Report Matrix

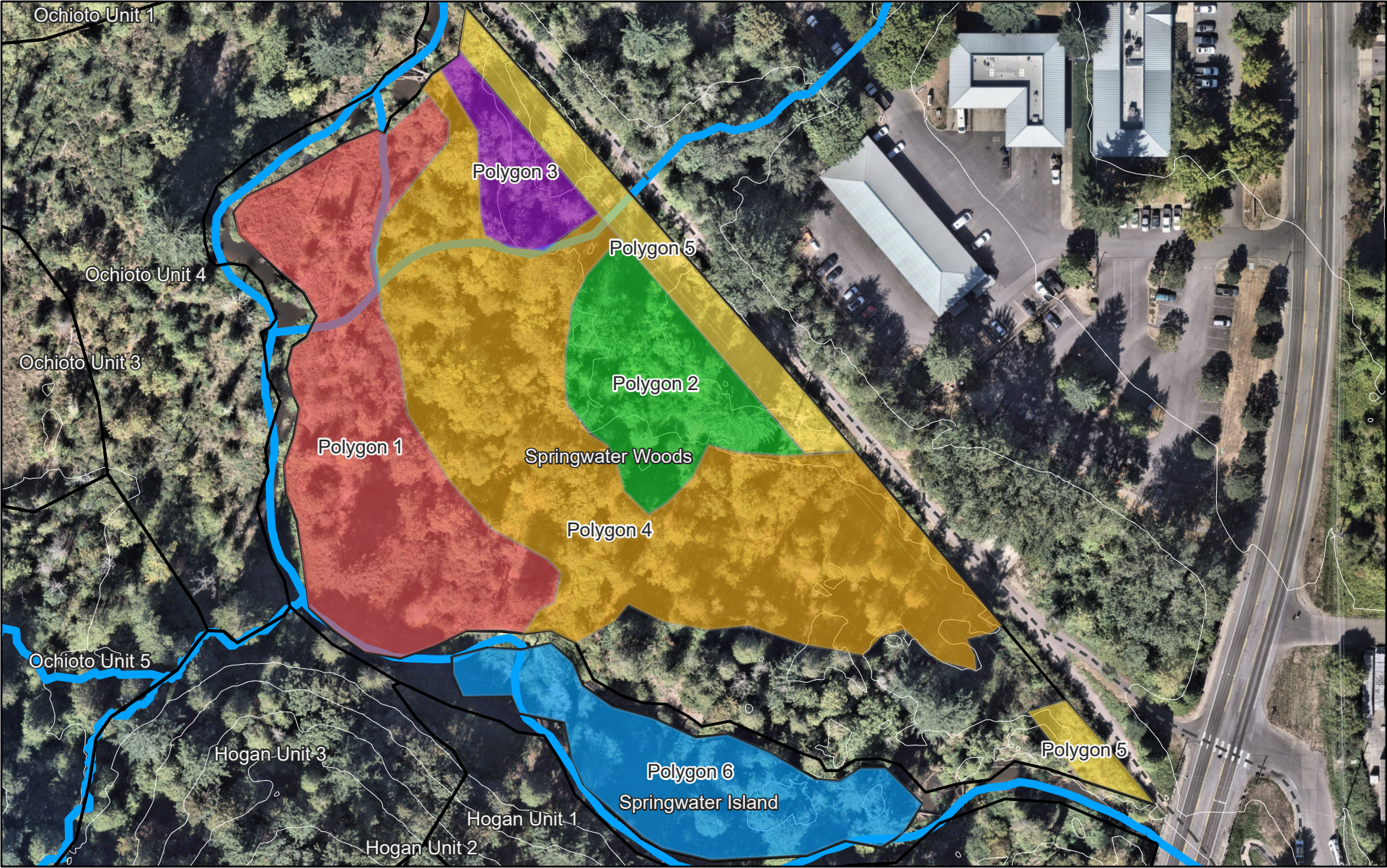
COMPLY WITH MUNICIPAL SEPARATE STORMWATER SEWER SYSTEM (MS4) NPDES PERMIT

Best Management Practice or Activity	Commitment	Performance Measure	Status for Fiscal Year 2024-2025	Adaptive Management	Pollutants (Joint from 0-3; BMP has No effect on Pollutant to Significant effect on Pollutant)										Watershed (Check mark for the watershed that BMP is used in)					Regulatory Program					
					Nutrient Phosphorus	Bacteria	Temp	DOT/DOH	Dioxin	Oil and Grease	Phenols	Mercury	Lead	PCBs	Johnson Creek	Pearson Creek	Columbia Slough	Sandy River	Columbia River	NPDES-MS4	Resource Shortage	LOC (Spillage)	NPDES-MSWTP	Level 10	Low STPH 1
See complete SWMP for full details on: GreshamOregon.gov																									
Stormwater O&M Program Pipe Cleaning Storm Drain Cleaning Stormwater Facility Maintenance Gray Infrastructure Maint. UIC Cleaning	Implement O&M activities to prevent or remove sediment and associated pollutants	- Miles cleaned/yr. - Volume of debris removed/yr.	Cleaned 833 miles of pipes. (Volume of debris was not measured for this activity given insufficiency of calculating it based off pipe material and size) 6079 residential drains cleaned, 1,063 arterial drains cleaned – 84 yds of debris removed; Sedimentation Modules 125,500 cleaned; 31.6 yds debris removed. Flow control manholes 28,208 cleaned; 16.5 yds debris removed. Detention Late Cleaning 22,238 cleaned; 8.2 yds debris removed. Detention manholes 19,208 cleaned; 14.3 yds debris removed. LDCs cleaned and inspected 13,005; 37 yds of debris removed.	None Proposed	2	3	0	3	3	3	3	3	3	3	✓	✓	✓	✓	✓	X		X			
Stormwater Manual for Development & Erosion Prevent & Sediment Control Standards	Implement the Development Standards to prevent or reduce pollutants via filtration, plant uptake, degradation, adsorption and others.	Track development, treatment type and areas treated.	See Table 4.7 of the NPDES Annual Report	None Proposed	3	3	0	3	3	3	3	3	3	3	✓	✓	✓	✓	✓	X		X			
Good Housekeeping at City O&M Facility	Train staff on prevention and best practices related to management of dirt, debris, drops, spills, and waste related to daily operations of the City's equipment and spills from work activities.	- At least annual cleaning of catch basins - Summary of activities and protocols	All catch basins and vaults are cleaned and inspected on a biannual or annual basis. Debris from O&M yard are decontaminated, stored, and transported to Waste Landfills.	None Proposed	3	3	0	3	3	3	3	3	3	3	✓	✓	✓	✓	✓	X		X			
Erosion Prevention & Sediment Control Program	Implement EPMs inspection to keep sediment from moving, control spills, ensure cleanups, prevent illegal dumping and disturbance of protected buffers for trees or riparian areas.	Track inspections and document corrections needed and compliance.	- A total of 296 construction sites were inspected; 227 single-family sites, 2 commercial construction projects, 8 grading projects, and 1 small family site. 23 total sites were disturbed for development. - Three erosion control inspections are completed per site: a pre-construction inspection, and interim erosion control inspection, and a final erosion control inspection at the end of the project. - There were 37 failed inspections requiring corrections for deficiencies such as installing/maintaining perimeter control, providing adequate cover for bare soil, planting windbreaks, improving construction entrances, and sweeping streets.	None Proposed	2	3	0	3	3	3	3	3	3	3	✓	✓	✓	✓	✓	X		X			
Private Stormwater Facility Program & Private Stormdrain Cleaning Program (SCAP)	Inspect private facilities are cleaned and maintained on a schedule that is based on best practices	Track private facilities by type, and summarize inspection results. Report total businesses, cleaning catch basins annually via program work and total drains cleaned. Estimate debris removed.	Gresham has 60 commercial or multi-family sites with proprietary underground vaults that are required to provide biannual documentation of inspection and maintenance. During FY 23-25 there were 2 sites that provided the required inspection and maintenance documentation. Due to staffing shortages, the city was not able to inspect and follow up with the other businesses during this reporting year. In FY 23-26, a city position was filled and this BMP enforcement and tracking is part of the new position. The MCAP had 178 businesses participated -1324 drains cleaned, 346 yds of debris removed.	None Proposed	2	3	0	3	3	3	3	3	3	3	✓	✓	✓	✓	✓	X		X			
Transportation Division O&M program	Implement O&M activities to prevent or remove sediment and associated pollutants	- Lane mile swept - Follow water protection O&M procedures per ODOT standards	10 residential sweeps- 12 arterial sweeps- 6079 miles swept	None Proposed	2	3	0	3	3	3	3	3	3	3	✓	✓	✓	✓	✓	X		X			
	Plan stormwater treatment for new road development	Type of stormwater treatment added and acres of area treated	There are two plans in development, set for FY 23-26 and FY 26-27: Rockwood Stormwater Tree Well Retrofit (1.4M) and Powell Blvd. Stormwater Tree Well Retrofit (1.5M). Also see Table 4.4 in the NPDES Annual Report	None Proposed																					
Water Quality Retrofits and Capital Improvement Projects	Implement capital and retrofit projects for stormwater and natural resources to prevent or remove pollutants, address temperature, and improve stream resiliency and function.	Track the number, type, watershed location and total drainage area of CIPs or retrofits constructed for water quality and natural resources	See Table 4.4 in NPDES Annual Report	None Proposed	2	2	2	3	3	3	3	3	3	3	✓	✓	✓	✓	✓	X		X			
Business Screening & Inspection Program	Implement program to include businesses with high potential to contribute stormwater pollution, including mercury.	- Annually screen and add new businesses, report inspected 12002 needed permits to DEQ - Inspection goal is 100-200/yr.	Total inspections/screenings/retrofits: 599, including 389 auto-manufacturing, or industrial businesses and 121 food service businesses. There was 1 food service that the private storm drain was needing to be cleaned and serviced. Of the auto-manufacturing/industrial businesses with identified stormwater associated non-compliance corrections, 13 related to maintaining/repairing storm drains, 32 related to pooling/seepage, and 48 related to secondary containment. See Appendix A in the main MS4 report for a list of businesses inspected by type, a list of 12002 businesses in Gresham, and a list of 12002 potential businesses.	None Proposed	1	0	0	3	3	3	3	3	3	3	✓	✓	✓	✓	✓	X	X	X			
Integrated Pest Management Program	Implement a plan with procedures that prevent or reduce impacts to surface water from public land, open fields, parks and right of way management.	Ensure staff are trained on procedures. At least every two years, discuss chemicals, products and approaches to land management to adaptively manage as needed for best probable outcomes. Avoid products with mercury.	- No changes to the existing IPMP or procedures. - Check Consider ways to monitor or evaluate practices or products used to aid adaptive management as resources allow.	None Proposed	2	0	0	0	0	0	0	1	0	0	✓	✓	✓	✓	✓	X		X			

[illegible]

NPT-2 Riparian Planting	Work with community, volunteers, and private landowners to install ecosystem potential vegetation within target shade buffer areas	*1) City-wide Assessment: overall riparian condition periodically assessed through City-wide Natural Resources Master Plan, Watershed Master Plans, and 10-year shade analysis updates. 2) Active restoration sites chosen based on: survival at existing planting sites (extending work at sites not meeting minimum 50% survival criteria) and selection of new sites based on Natural Resources Master Plan prioritized sites and/or partnership opportunities. 3) Annual Report on implementation progress by watershed and acreage of project, total annual budget, future planted, statement of existing shade classification, and partners/volunteers involved. 4) Adaptive management strategies for overall restoration approach included in each TMDL Implementation Plan.	Development of the Kelley Creek Watershed Shade Plan and Natural Resources Master Plan during the permit year lead to new CIP project lists and cost estimates. City coordinated Council consultation FCS Group during permit year to help develop updated SDC fees that will be collected to fund the riparian projects in both master plans. Council adoption of new SDC's anticipated 2026.	None Proposed		0	0	3	0	0	2	0	2	0	0	✓	✓	✓	✓		X	X							X
NPT-3 Monitoring and Reporting	Annually report on implementation of projects, every 5 years report on density, species, and survival statistics; every 10 years provide an analysis of change in shade conditions.	Report by Watershed: Annually: acreage of sites in preparation/planting/maintenance/monitoring phases, linear feet of stream banks of sites in preparation/planting/maintenance/monitoring phases; if of stems planted and annual survivability (via available planting area); annual budgetary expenses & partner/volunteer involvement (hours per site). Every 5 years: Non-repeating projects like the forest health assessment findings will be reported using acreage to denote the extent of areas declining or improving.	See Table 4.6 (Restoration and Outreach) in NPDES Annual Report for site specific info. * Implemented improved photo-monitoring using 360 cameras. Initial site photos have been completed for most sites during this reporting year. * Implemented new project site data collection with development of guidelines in ArcGIS Online to track site metrics which will allow for trend analysis and provide a basis for adaptive management decisions. Example for a Johnson Creek site attached to this table as Appendix B-1.	None Proposed		0	0	3	0	0	0	0	1	0	0	✓	✓	✓	✓		X	X							X
NPT-4 Code & Overlay Reporting	Annually report on Development Code implementation (Urban Dev. & Planning Dept), especially the Natural Resource Overlay (NRO) and other related ordinances to preserve riparian canopy and minimize soil disturbance.	Annually 1) Updates to Greatham Camp Plan Vol 1 and 2 and Vol 3 Development Code related to protections for riparian areas, improving shade conditions, and prevention of HQ discharge 2) Hazard use applications issued for projects with NRO 3) enforcement actions related to riparian areas	* No changes to the Camp Plan to report for this permit year. * Federal documents have resulted in delay to Oregon's full adoption of FEMA BOP language. Greatham has not initiated requirement to respond by January 2025 with plan approval for critical habitat protection method that also protects water quality. City chose permit-by-permit approach. * Section (7) Natural Resource Overlay-related land use reviews approved in the FY 24-25 * One (1) Natural Resource Overlay-related code violation (Status Open)	None Proposed		0	0	3	0	0	0	0	1	0	0	✓	✓	✓	✓		X	X							X
NPT-5 Public Involvement	Provide the TMDL, BP, annual report, permits, SWMP and SMP for public review and comment. Comments can be submitted using the posted staff email address associated with the documents. Notify watershed partners of the posted documents to encourage their involvement and feedback. Post on social media platforms with a brief explanation of what the document is and with links to the documents meant for review.	Provide a public comment period, review of comments and consideration to further development of said plans	Public involvement data can be found in Table 4.6 and additional Education & Outreach can be found on Tables 4.2 and 4.4 in the NPDES Annual Report In this permit year, program added contextual language to the webpage used for posting volunteer restoration opportunities to better integrate restoration initiatives to TMDL program. https://www.greshamoregon.gov/our-government/services/volunteer-and-outreach/initiatives?utm_source=facebook&utm_medium=social	None Proposed		0	0	3	0	0	0	0	3	0	0	✓	✓	✓	✓	✓	X	X							

2025 Springwater Woods



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Trails and Paths

--- Path Off Roadway Existing

Planting Polygon

Polygon 1



Polygon 2



Polygon 3



Polygon 4



Polygon 5



Polygon 6



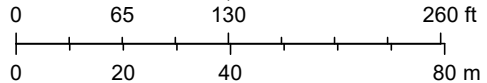
Project Site Boundaries

COG_Streams_pre2021

Contours_10ft_VectorTile

Appendix B-1, page 1

1:2,009



2025 Springwater Woods

		Polygon 1	Polygon 1	Polygon 2	Polygon 3	Polygon 4	Polygon 5	Polygon 6 (Springwater Island)	
Planting Area		54,500 SQFT		23,100 SQFT	9,250 SQFT	88,350 SQFT	18,000 SQFT	28,650 SQFT	Running Total
Planting Spacing		12' O.C. tree 8' O.C. shrub	Live Stakes	12' O.C. tree 4' O.C. shrub	12' O.C. tree 4' O.C. shrub	12' O.C. tree 8' O.C. shrub	4 ft O.C. shrub	8 ft O.C. tree 8 ft O.C. shrub	
Plantable Area		75% 40,875 SQFT		25% 5,775 SQFT	25% 2,315 SQFT	30% 26,505 SQFT	50% 9,000 SQFT	50% 14,325 SQFT	
Latin Name	Common Name	Infill	Waters edge	Infill	Infill	Infill	Infill	Infill	
<i>Abies grandis</i>	Grand Fir	15		10					25
<i>Acer macrophyllum</i>	Big Leaf Maple	40		25	10				75
<i>Alnus rhombifolia</i>	White Alder	25							25
<i>Alnus rubra</i>	Red Alder	150		25		75		50	300
<i>Calocedrus decurrens</i>	Incense Cedar	25		15	10				50
<i>Crataegus gaylussacia</i>	Black Hawthorn	25		15	10				50
<i>Fraxinus latifolia</i>	Oregon Ash	25				100		25	150
<i>Populus trichocarpa</i>	Black Cottonwood	100	25			150		50	300
<i>Pseudotsuga menziesii</i>	Douglas Fir	150		25	25				200
<i>Thuja plicata</i>	Western Red Cedar					75		50	125
<i>Cornus stolonifera</i>	Red-Osier Dogwood		50				75		75
<i>Corylus cornuta</i>	Beaked Hazelnut	75					25		100
<i>Lonicera involucrata</i>	Twinberry	175		75	25			25	300
<i>Philadelphus lewisii</i>	Mock Orange	30		10	10				50
<i>Physocarpus capitatus</i>	Pacific Ninebark	25	25			75	75	25	200
<i>Ribes sanguineum</i>	Red Flowering Currant						50		50
<i>Rosa nutkana</i>	Nootka Rose						100		100
<i>Rosa pisocarpa</i>	Swamp Rose					25	125		150
<i>Rubus spectabilis</i>	Salmonberry	50				75	50	25	200
<i>Salix geyeriana</i>	Geyer's willow		25						0
<i>Salix lucida</i>	Pacific Willow	50	50			125		25	200
<i>Salix scouleriana</i>	Scouler's Willow	75						25	100
<i>Salix sitchensis</i>	Sitka Willow	25	25			50			75
<i>Spiraea douglasii</i>	Douglas Spirea					50			50
		1060	200	200	90	800	500	300	2950

Site Name	Primary Stream System	Project Funding	Management Status	NRMP Reach	Site Area	Watershed Basin	Site Linear Feet of Stream Bank	Complex
Springwater Woods	Johnson Creek	General N.R. Budget	Site Planting	JC14_JC15	5.2	JCW	1461	SWC
Springwater Island	Johnson Creek	General N.R. Budget	Site Planting	JC14_JC15	0.67	JCW	1047	SWC

Appendix C:

Acronyms and Abbreviations

BMP	Best Management Practices
City	City of Gresham
DEQ	State of Oregon Department of Environmental Quality
EMP	Environmental Monitoring Program
EPA	U.S. Environmental Protection Agency
IDDE	Illicit Discharge Detection and Elimination
IGA	Intergovernmental Agreement
IPM	Integrated Pest Management
ISW	Industrial Stormwater Program
LID	Low-Impact Development
MIP	Maintenance Inspection Program
MS4	Municipal Separate Storm Sewer System
NEC	No Exposure Certification
NPDES	National Pollutant Discharge Elimination System
NPS	Non-Point Source
O&M	Operations and Maintenance
PLRE	Pollutant Load Reduction Evaluation
ROW	Right of Way
SMF	Stormwater Management Facility
SWMM	Stormwater Management Manual
SWMP	Stormwater Management Program
TIP	TMDL Implementation Plan
TMDL	Total Maximum Daily Load
UGB	Urban Growth Boundary
UIC	Underground Injection Control
WLA	Wasteload Allocations
WPP	Wellfield Protection Program

Appendix D:

City of Fairview NPDES MS4 Annual Report Permit Year 30

Section Four – City of Fairview Summary of Program Monitoring

Municipal National Pollutant Discharge Elimination System Annual Report for Permit Year 30, Permit #101315, November 1, 2025

Executive Summary

The City of Fairview (City) manages the stormwater system with the goal of reducing pollutants to the maximum extent practicable, preventing flooding and enhancing natural resources. The City is a co-permittee with the City of Gresham on the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit (#101315).

DEQ reissued the Permit on October 1, 2021 requiring the City to modify the SWMP to reflect the new permit conditions. The City's 2022 SWMP incorporates the new Permit conditions and includes best management practices (BMPs) and other elements intended to reduce the introduction of pollutants to the maximum extent practicable (MEP). The Stormwater Management Plan (SWMP) was last modified on December 29, 2015 in accordance with Schedule B.4.a of the City's NPDES MS4 permit requirement for updates.

This Permit Year (PY) 30 Annual Report documents implementation activities from July 1, 2024 through June 30, 2025 within the city limits of Fairview. Activities include, but are not limited to, the Best Management Practices (BMP) contained within the Stormwater Management Plan (SWMP). The status of the BMPs and adaptive management are summarized in the table that follows. Table 4-2 (Prioritization Criteria) summarizes the time period July 1, 2024 to June 30, 2025 implementing the 2022 SWMP. Section 2 of this report summarizes the Environmental Monitoring Program that is conducted by the City of Gresham on behalf of the City of Fairview.

As part of the annual adaptive management process, data and feedback were collected from staff responsible for implementing/reporting on each BMP. Factors considered include but are not limited to: Was the BMP measurable goal attained? If not, describe circumstances why, and how progress will be made toward future attainment. For multi-year BMPs, were milestones or timelines met? Can we feasibly refine or improve the BMP to gain efficiency or effectiveness in removing stormwater pollutants? In addition to assessing the implementation of each BMP, staff weighed resource availability and needs related to the overall stormwater program, including consideration of budget/funding, training needs, new technology and available equipment. The annual adaptive management process will inform any alterations to the stormwater program or future modifications to the SWMP.

There are no Urban Growth Boundary expansion areas contiguous to the City of Fairview. Consequently there are no associated concept planning, significant land use changes or significant development activities to report for PY 30.

Stormwater Management Program Budget

City of Fairview Stormwater Management program costs for Permit Year 30 are primarily associated with the Department of Public Works.

Stormwater fund expenditures and anticipated budget allocations incorporate wages and benefits, operating materials, equipment repair/maintenance, water testing (NPDES compliance), storm water disposal (NPDES permitting), improvements, and general administration.

Street fund expenditures and anticipated budget allocations incorporate wages and benefits, operating materials, maintenance services (including IGA with Multnomah County), equipment repair/maintenance, improvements, traffic calming, footpaths and bike trails, and general administration.

The table below outlines fund expenditures for PY 30 and provides the anticipated budget for Permit Year 31. The actual expenditures for PY 28 and PY 29 area included in this report. See Attachment A.

Table 4-1		
	2024-2025	2025-2026
Program Area	PY 30 Expenditures	PY 31 Anticipated Budget
Stormwater Fund	\$928,502	\$1,122,400
Street Fund	\$836,516	\$1,563,500

City of Fairview Stormwater Management Plan (2022-2026)

Stormwater Assets Maintenance Program (SMP) A-C.				
Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
A. CC/TV/Pipe Cleaning	The City's stormwater system currently consists of approximately 13.6 miles of pipes that drain to both surface and groundwater. The City inspects a portion of its existing pipes each year for assets management that record the condition and repair needs in the near and long term. Pipes are cleaned to remove excessive buildup, if the SOP threshold for cleaning is met.	Inspect 1 - 2 miles, clean if SOP threshold is met	Inspect: annually/ongoing Cleaning projected to be an average of 1-2 miles over permit cycle	annually/ongoing
B. Storm Drain Cleaning	The City's stormwater system currently consists of approximately 490 stormdrains that drain to both surface and groundwater. Arterial drains are priority due to higher pollutant loads than lower traffic streets and residential are also a priority due to potential for clogging and minor flooding. Inspection of all drains is a goal, but due to parked cars (even after notices are given) 100% is not attainable. Studies have shown that drains tend to remobilize trapped sediment once 2/3 or more full, and at this time is the City's SOP cleaning threshold. Typically, the City cleans all drains regardless of reaching the threshold, which is a higher performance standard. The range quoted allows flexibility in work load shifting to address other significant water quality facility rehabilitation activities in the future, as needed, while still meeting objectives over the permit cycle. • Outfalls: 38 total (9 High Priority Outfalls) • Underground Injection Control Facilities (UICs) / Sumps and Sedimentation Manholes: 3 total • Flow Control Manholes: 4 total • Vortex Manholes: 3 total • Trash Racks: 3 total • Weir: 1 total • Oil Water Separator: 1 total • Storm Cartridges/Filters: 2 total • Detention Pipelines	Inspect 50 percent of outfalls. Clean catch basins and inspect adjacent pipes in one third of the City annually. Clean all water quality manholes (5). Update maps of City Structural Stormwater Facilities.	Track facilities inspected and maintained. Track number of catch basins cleaned. Estimate quantity of sediment removed from catch basins and water quality manholes.	Total tracking of facilities inspected and maintained the following: • 26 out of 39 (67%) Outfalls were inspected. City was unable to gain access for the remaining 13 Outfalls. • Portion of catch basins were cleaned in the year 2024 due to County's fleet needing shop maintenance once more this year. • Same status for the all the BMP's below. Vector fleet were not available to perform maintenance on the all structure list below. • Underground Injection Control Facilities (UICs) / Sumps and Sedimentation Manholes: 3 total • Flow Control Manholes: 4 total • Vortex Manholes: 3 total • Trash Racks: 3 total • Weir: 1 total • Storm Cartridges/Filters: 2 total • Detention Pipelines Crestwood's Oil Water Separator did receive maintenance from Multnomah County. Updating GIS map of City Structural Stormwater is Ongoing Annually.
C. Maintain Green Infrastructure	Inspect and maintain vegetated facilities. It is important to note that vegetated facilities require the control of noxious weeds as well as thinning, pruning, plant replacement, in addition to sediment removal. Plant removal over time is beneficial, as some plants uptake pollutants in their roots and leaves. There are 5 neighborhood ponds that require sediment removal based on capacity for accumulation (varies from 5-12 year lifecycle). Perform inspection and required maintenance as stated in the O&M Plan—clean stormwater detention basins in areas where sediment and/or debris tend to accumulate. Lastly, a smaller portion of annual hours are utilized for bio-filtration swales. stream vegetation/woody debris support work. • Rain Gardens: 4 total • Detention Ponds: 5 total • Natural Streams • Bio-filtration Swales	Inspect 50 percent of ponds, swales and ditches. Inspect natural stream channels from bridge and road crossing. Maintain vegetation and control weeds using Integrated Pest Management techniques. Update maps of City Structural Stormwater Facilities.	Track facilities inspected and maintained. Estimate quantity of sediment removed from pond, swales and ditches. Annually/ongoing	All facilities were maintained. All facilities were checked off on a form. Sediment and vegetation was removed this year for two swales. GIS map updates on City structural stormwater facilities are ongoing.

City of Fairview Stormwater Management Plan (2022-2026)

Stormwater Assets Maintenance Program (SMP) A-I.				
Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
A. Proprietary Devices (grey)	There are 1 Proprietary Devices with multiple filter cartridges (varies 1-12 per device) which are maintained at the frequency recommended by the manufacturer.	Inspect 100% of Proprietary Devices Clean based on Manufacturers threshold recommendation.	Annual inspection, cleaning typically includes Sediment removal from about 1 proprietary devices annually	Crestwood Shop proprietary device cleaned.
B. Spills, Illicit Discharge Investigation, Emergency Response	Investigate and/or assist with spill response, illicit discharge concerns, emergency stormwater controls for other department assistance, natural disaster response (flooding, downed trees, etc.)	Follow City Spill Response and Illicit Discharge Investigation procedures Conduct Spill Response all Department training and procedure review twice during the permit cycle	annually/ongoing	annually/ongoing
C. Illicit Discharge Enforcement	Implement City code sections 13.40.050 and 13.40.110: - City code section 13.40.050 prohibits constructing, using, maintaining, or continuing an illicit connection to the storm drain system. - City code section 13.40.110 discusses enforcement actions for failing to comply with control of non-stormwater discharge. The penalty for a first violation is \$250. A penalty of \$1,000 may be imposed for each subsequent failure to comply and each day of a continuing violation shall constitute a separate offense. The City may order compliance by written notice that includes performance of monitoring, analysis, and reporting; elimination of illicit connections or discharges; abatement or remediation; payment of fines; and implementation of source control or treatment BMPs. The public works director may also exercise authority to enforce a construction permit or NPDES permit through a stop work order if necessary.	For identified illicit discharges conduct appropriate enforcement actions.	Track number, location and resolution of enforcement actions.	There was 2 illicit discharges that was not enforceable this permit year. 1. Plane Crash The plane crash occurred on August 31, 2024 and hit a tree before eventually landing at a Fairview Terrace townhome. City was informed by personnell including DEQ that there was no contamination nor leakage into bodies of water. The site cleanup started that same weekend. 2. Oil Dump into Storm Drain City received email form OERS and went on site to inspect and take pictures. River City Environmental was contacted same day and storm drains were cleaned the same day. City placed spill kits to protect storm drain from further receiving more oil laden stormwater. City obtained license plates from the caller and had it run by Fairview's Chief. Records showed the car was sold but was not currently registered, leading to a dead end.
D. Illicit Discharge Field Screening Procedures	Conduct dry weather inspections of accessible outfalls following the procedure in the Stormwater Operation and Maintenance (O&M) Manual to search for, detect, and prevent illegal dumping of pollutants and illicit connections (including connections from sanitary sewers and commercial and/or industrial wastewater sewers) to the storm sewer system. Any dry weather flows identified will be reported to the public works department. Annually update maps as necessary to indicate field screening locations.	Inspect accessible outfalls annually. Maintain maps of outfall inspection locations.	Track number and percent of outfalls inspected.	The City of Fairview has reviewed its outfall inventory and identified a total of 39 outfalls; 8 of which are categorized as high priority outfalls. Inspected 26 out of 38 outfalls (67%) this PY 30 Records are maintained in paper and electronic form. The City will continue to update its GIS map as needed.
E. Illicit Discharge Investigation Procedures	Implement follow-up actions on a prioritized basis when problems are reported to the public works department. Follow up actions may include sampling for pH, dissolved oxygen, temperature, conductivity, ammonia, and total chlorine. If elevated results or poor water quality are detected, additional samples could be collected for lab analysis. If screening results indicate a potential problem, staff will conduct upstream investigations. The City will revise and document standard operating procedures to address new permit requirements and to document and update the details of the illicit discharge field screening and investigation procedures by June 30, 2012.	Annually review and update Illicit Discharge and Investigation Procedures related to mapping, enforcement response and pollutant parameter action levels. Respond to illicit discharges within 5 days of source identification.	Track number and type of problems reported, and track problem resolutions. Track status of revisions to procedures.	There were 2 illicit discharges investigations this permit year. 1. Plane Crash The plane crash occurred on August 31, 2024 and hit a tree before eventually landing at a Fairview Terrace townhome. City was informed by personnell including DEQ that there was no contamination nor leakage into bodies of water. The site cleanup started that same weekend. 2. Oil Dump into Storm Drain City received email form OERS and went on site to inspect and take pictures. River City Environmental was contacted same day and storm drains were cleaned the same day. City placed spill kits to protect storm drain from further receiving more oil laden stormwater. City obtained license plates from the caller and had it run by Fairview's Chief. Records showed the car was sold but was not currently registered, leading to a dead end. "

City of Fairview Stormwater Management Plan (2022-2026)

Stormwater Assets Maintenance Program (SMP) A-I.				
Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
F. Spill Prevention	Wellhead Protection Program. The wellhead protection program serves to prevent spills and illegal dumping. The City will work to maintain its existing agreement with the City of Gresham for wellhead inspection in the Columbia South Shore Well Field Wellhead Protection Area and continue to implement wellhead protection throughout Fairview for the protection of groundwater. This program is included here because of its residual benefits to stormwater. Wellhead Protection - Intergovernmental Agreement. The City of Gresham and the City of Portland entered into an intergovernmental agreement for the Implementation of the Columbia South Shore Well Field Wellhead Protection Program in 2003 (City of Gresham contract number 1609). This agreement provides protection of the Columbia South Shore Well Field Wellhead Protection Area lying within Gresham and Fairview from contamination by hazardous substances generated at industrial and commercial facilities.	Coordinate with the City of Gresham to conduct inspections once during the permit term of all businesses with regulated quantities of hazardous materials in the well field.	Track the number of inspections conducted.	City of Fairview encompasses and area of 3.5 square miles and is located in the Columbia South Shore Wellfield Protection Area. City of Fairview maintains the existing Intergovernmental Agreement with the City of Gresham established in 2003 for inspection of the regulated and monitored industrial/commercial facilities in the Columbia South Shore Wellfield Protection Program, (Zone 1). This Permit Year 30, Fairview Businesses were inspected. "The Columbia South Shore Well Field Protection Program Committee meets quarterly to discuss any changes to code provisions and updates of the Wellhead Protection Program Reference Manual."
	Fairview has adopted Ordinance #12:2002 to protect the Columbia South Shore Well Field Wellhead Protection Area from contamination by hazardous substances by establishing an inspection and enforcement program governing the utilization, storage and transportation of hazardous materials in Fairview's portion of the Columbia South Shore Well Field Wellhead Protection Area. A wellhead inspection is performed at commercial and industrial facilities by the City of Gresham. The entire city, except for a residential area, high school and park, is included in the wellhead protection program. Fairview, Gresham and Portland Staff meet at least annually to discuss any changes to code provisions and any rules promulgated thereunder by either party. Wellhead Protection - City Code and Reference Manual.			
	Wellhead protection is discussed in City code chapter 16.10. A wellhead protection program reference manual has been developed that establishes the wellhead protection boundaries. The code also includes requirements for reporting, standards, and inspections related to the storage, handling, use and transportation of hazardous materials; penalties for violations and enforcement actions; compliance requirements; building and site permit review and approval requirements; and inspection fees.			
G. Spill Clean-up	Maintain agreement with the City of Gresham Fire Department for clean-up after structural fires and vehicular accidents to prevent pollutants and debris from being washed into the storm drain system. When there is a hazardous spill or a spill of any other substance that: - Is hazardous in any quantity - Is non-hazardous and greater than 42 gallons on the ground - Or is any quantity that has entered a waterway or a dry well. The City of Gresham Fire Department staff notifies the Oregon Emergency Response System (OERS). OERS then notifies the Oregon Department of Environmental Quality (DEQ) and other state and local agencies that may be affected. The responsible party, if identified, is required to contact an environmental clean-up company and pay for clean-up costs. Examples could include spillage of a 55-gallon-drum of restaurant grease or sanitary sewer overflows on private property, resulting in or having the risk of resulting in, discharges to the public stormwater system. DEQ remains the enforcement authority in these cases. DEQ may choose to enforce against the responsible party under the following conditions: 1) the party has acted maliciously; 2) the party is a repeat offender; or 3) the party has failed to report the incident to DEQ.	Maintain agreement with City of Gresham Fire Department. Investigate spills and provide emergency containment and clean-up as necessary.	Track spill locations, type of materials and response activities.	1. October 20, 2023: There was a minor fuel spill caused from a pump's nozzle in Chevron that had maintenance issues. Fairview was notified by Gresham and by then, Clay was already taking care of it. Clay sent an email the next day confirming the maintenance issue had been addressed and spill was cleaned up.
	Non-Hazardous Substances Public Works staff will investigate and provide emergency containment and clean-up as necessary. If the responsible party can be identified, he or she is directed to provide containment and site clean-up. If the spill is an imminent threat to waters of the state, the City reserves the right to provide clean-up and bill the responsible party for the work. The responsible party will be invoiced for any response and clean-up provided by the City. Examples include spills or dumping of paint, auto fluids, carpet cleaning wastes or concrete, etc. into catch basins or onto the street. In non-emergency situations, such as dumping of debris on private property near a stream bank, Public Works staff will notify the responsible party, verbally and in writing, and specify a timeframe for clean-up. Staff will refer the incident to Code Enforcement if the responsible party does not respond within the specified time frame. Code enforcement has the authority to issue Abatement Procedures, Violations or Civil Actions.			
	Releases from Traffic Accidents If there is a spill of automotive fluids resulting from a traffic accident, the Gresham Fire Department will spread an absorbent compound (usually clay) and specialized absorbent pads on automotive fluids. Buckets are placed underneath dripping fluids. The road is swept and cleaned and, when necessary, additional protection is placed around the catch basins. Large leaking spills from commercial vehicles or semi-trucks are captured using a children's plastic pool. From a legal standpoint, the generator of the spill is responsible; therefore the waste materials are bagged and placed inside the wrecked vehicle or given to the tow truck driver for disposal. The City will perform the clean-up or utilize private clean-up contractors in order to continue the spill response program, when no responsible party can be identified.			

City of Fairview Stormwater Management Plan (2022-2026)

Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
H. Construction Site Inspections	The City currently reviews plans and inspects construction sites required to meet the City's erosion control standards using the following procedures: 1. Visit every site over 1 acre after the first significant rainfall event and periodically thereafter. If time is limited, the City prioritizes inspections by visiting problem sites first, then visiting facilities that would have the highest environmental effect if the erosion control failed.	Inspect all construction sites required to meet City erosion control standards. Make the Erosion Prevention & Sediment Control (EPSC) manual available online. Annually review code provisions.	Track the number of sites that were permitted and inspected. Report the number and type of enforcement actions.	A total of 19 sites were required to meet erosion control standards There were 1 enforcements made during the construction inspections out of approximately 62 inspections. The one correction was installation of catch basin insert and covering bare soil surfaces. Sites with active 1200-C Permits were inspected following 1/2" of precipitation. The municipal code is reviewed for compliance with stormwater requirements on an annual/ongoing basis.
I. Good Housekeeping: O&M Yard	The City has one facility that includes the treatment, storage or transport of municipal waste. This facility is the Corporation Yard Dumpster. Collection of waste from municipal litter receptacles is collected and stored in a dumpster at this site until the City's garbage hauler collects the waste on a weekly basis. The dumpster has a cover on it and runoff from the site is treated by a structural stormwater filter. No additional stormwater management practices are deemed necessary for this site. Update SWPPPs for two municipal facilities and conduct annual inspections.	Annually inspect two municipal facilities (Crestwood and Public Works Shop)	annually/ongoing	annually/ongoing inspections of these two sites were performed this permit year.

City of Fairview Stormwater Management Plan (2022-2026)

Public Land Management (PLM A-E)				
Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
A. Consolidated Stormwater Master Plan (CSMP)	The Consolidated Stormwater Master Plan (CSMP) adopted in 2007 combines infrastructure improvements including retrofit opportunities with federal and state water quality requirements. Projects were developed to address water quantity and quality issues, utilizing hydrologic and hydraulic modeling as well as information from the TMDL regulatory program and the NPDES stormwater discharge permit.	Continue to make progress in the implementation of the CSMP. Update CSMP within one year of permit issuance.	Track the number, type and watershed location of projects that are completed.	The Consolidated Stormwater Master Plan (CSMP), CIP project list was updated by the City of Fairview and Brown and Caldwell in 2016. There were 2 projects related to the Consolidated SW Master Plan (CSMP) designed/constructed this PY 30 1. 6th and NE Lincoln- One (1) new Rain Garden designed this PY 2. Multnomah Pond- Final retrofit design approved this PY
B. Integrated Pest Management	The City encourages use of the Portland Parks and Recreation Pest Management Guide. This guide emphasizes controlling pests that are harmful to the health or aesthetic value of park plantings in a manner that is cost-effective, safe, and environmentally responsible. It is an approach that uses multi-faceted strategies that minimize negative impacts on the environment and on human health. The controls used in this program include manual, mechanical, cultural, biological and chemical methods. Often a combination of methods is used. Examples of Integrated Pest Management include: • Timing of chemical applications to avoid runoff. • Mowing high grass and brush to reduce weed seed crops in rough areas. • Pruning of trees and shrubs to increase air circulation to reduce susceptibility to disease and insect problems. • Appropriate fertilizing to encourage plant health and resistance to pests (i.e., weeds, insects and disease). • Using plants with natural resistance to pests. • Combining turf aeration and over-seeding along with any application of broadleaf weed control to eliminate the cause of the problem, and therefore the need for repeated applications.		Track City planting projects that incorporate native plants.	There was no planting projects performed this year.
C. Chemical Applicator Licensing	Maintain staff certification in public pesticide application and follow Oregon Department of Agriculture (ODA) requirements related to herbicide application.	All chemical applications will be supervised by an ODA Certified Applicator.	N/A	2 City employees have Chemical applicator licensing.
D. Native Vegetation	Encourage the use of native vegetation in riparian areas on private and public property to reduce the need for fertilizers, pesticides, and herbicides. Planting and landscape policies for riparian buffer areas encourage use of vegetation (indigenous or imported) that is self-sustainable without the need for pesticides or herbicides. Riparian buffer permits are issued for alterations to the landscape within 50 feet of Fairview Creek, Fairview Lake, the Columbia Slough and their tributaries (City code chapter 19.106).	Review planting plans associated with riparian buffer permits.	Track number of riparian buffer permits.	2 riparian buffer and 2 dock permits were reviewed this year.
E. Design Standards for Public Projects	Follow the Standard Specifications for Public Works Construction which requires treatment of stormwater runoff through the use of BMPs. Maintain database of BMPs that are implemented.	Ensure that public works stormwater related projects address treatment of runoff as appropriate.	Number and type of public stormwater quality BMPs built.	No public stormwater quality facilities were built this permit year.

City of Fairview Stormwater Management Plan (2022-2026)

Pollution Prevention from City Activities (PPCA A-I)				
Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
A. O&M for Public Roads, bridges: sweeping	The City contracts with Multnomah County for street sweeping (approximately 6 times per year). The frequency is based on weather conditions, road conditions and funding.	Maintain contract with Multnomah County.	Track frequency of sweepings.	Multnomah County conducted a total of 27 street sweepings this PY 30. Please see details above, Right of Way operation and maintenance. March: 4 May: 7 October: 4 January: 2 December: 7 August: 3
B. O&M for Public Roads, bridges: deicing	Sand and gravel are applied to roadway surfaces to assist with traction during inclement weather. The sand is removed and recycled as soon as possible after the snow or ice event. Yard debris is picked up from residents weekly by the City's solid waste provider. The Snow Removal Operating Plan is available on the City's website.	As weather permits, remove gravel when it is no longer needed.	Track processes conducted for sand and gravel removal.	3-4 yards of sand/gravel was applied to 15 County/City intersections only. Only snow plows took place along streets. Once weather permitted, County sweepers cleared intersections free of sand/gravel
C. Right of Way – O&M	The City contracts with Multnomah County for road maintenance that includes roadside mowing, brushing and pavement maintenance. The maintenance program is substantially similar to, and at least as protective as, the ODOT Routine Road Maintenance program approved under the current 4(d) limit.	Maintain contract with Multnomah County for road maintenance.	s	City of Fairview maintains an IGA with Multnomah County for road maintenance activities. Road maintenance activities performed at county roads this PY 30, are as follows: - Catch basins cleaning - 0 times this year - Roadside mowing - As needed - Route sweeping - 27 times - Misc. sweeping (snow gravel pick up) - Crack Sealing Pavement Preventive Maintenance - 0 this PY - County has repaired some potholes in Fairview. - Pavement Marking Restoration - None performed this PY
D. Water Line Flushing	The City periodically flushes all public water lines to ensure the reliability and quality of the domestic water system. To minimize impacts to the storm system, discharges are dechlorinated with the use of ascorbic acid (vitamin C). The flushing crew periodically tests the chlorine levels of the discharge prior to entering the storm system.	Dechlorinate waterline flushing with vitamin C.	NA	All lines flushed according to procedures. No chlorine detected.
E. Sanitary Sewer System Program	Limit wastewater infiltration through the operation, maintenance and construction of the sanitary sewer infrastructure based on existing conditions and projected sanitary flows.	Respond to pump station failures. Perform cleaning of the problem areas of the City's sanitary sewer system. Construct pipe restoration projects to replace defective pipe and reduce inflow and infiltration.	Track identified sanitary problems and resolutions related to the storm system each year.	No sanitary problems occurred this year.
F. Municipal vehicle monitoring and maintenance	Ensure that materials from municipal vehicles do not leak, spill, or otherwise release contaminants onto roadways or open spaces where they may be washed into storm drains or waterways. Municipal vehicles are inspected by the driver during loading and unloading. If any leaks are observed between the regular maintenance the vehicles are repaired immediately.	Maintain vehicles on a 6-month schedule.	Track status of municipal vehicle maintenance.	All City fleet vehicles (Public Works and Administration) were regularly maintained and serviced as scheduled (every 6 months) with auto service providers. Vehicles maintenance had no issues.
G. O&M Plan	Use the O&M Plan as a guide for designing and maintaining public storm facilities in order to maximize water quality benefits while maintaining flood capacity. The O&M Plan is intended to help locate and eliminate pollutants and provides a framework for maintaining field inspections records.	Implement the procedures in the O&M Plan. Review the O&M Plan by November 1, 2013, and update as necessary to maximize water quality benefits while maintaining flood capacity.	Track annual changes made to the O&M Plan	Changes to the O&M plan are ongoing.
H. Litter Receptacles	Provide, collect, and maintain litter receptacles in strategic public areas and during major public events to provide disposal of pet waste bags and prevent trash from entering the stormwater system.	Maintain at least one litter receptacle at all public parks greater than 1 acre. Provide collection a minimum of once per week.	Track number of litter receptacles.	40 receptacles are maintained/provided collection at least one day of every week.
I. Staff Education and Training	Conduct training for new employees and contract employees on stormwater requirements and train existing employees when there is a significant update to the documents used by the City that regulates stormwater pollution control activities.	Provide annual training to personnel involved in stormwater management.	Track personnel receiving training annually and document the trainings received.	There was no staff training for this permit year PY 30 due to major staff changes. Staff training is only 1 spot short, as a result, training will occur right before Winter..

City of Fairview Stormwater Management Plan (2022-2026)

Public Reporting, Engagement, Outreach & Behavior Change (PREOB A-E)				
Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
A. Report Illegal Dumping and Illegal Connections	Continue to facilitate efforts by the public to report illegal dumping, illicit connections, and other incidents. Implement public reporting program as described in the Stormwater Operation and Maintenance (O&M) Manual.	Respond to reports and/or complaints from citizens regarding observed water quality problems within 24hrs or the next business day if report is made during the weekend.	Track the number of reports/complaints received, and the follow-up actions conducted (including the timing of the follow-up action).	There was 1 reports/complaints received this year.
B. Illegal Dumping and Illegal Connections, Public Education	Educate the public about the harmful effects of dumping oil, antifreeze, pesticides, paints, solvents, and other potentially harmful chemicals into storm sewers or drainage channels.	Support recycling and disposal programs; programs that provide convenient means to dispose of materials, existing solid waste management programs. Educate the public regarding the stormwater pollution that results from dumping and illegal connections.	Track the number of public recycling and disposal programs conducted annually.	The Fairview Point contains outreach articles educating the public about harmful effects of dumping hazardous materials and waste into storm sewers or drainage channels as well as public recycling and disposal information. The City's website posted contact information as well about reporting illegal dumping and illegal connections (BMP 4.3). Staff also track public complaints, reports, and inquiries regarding illegal dumping, connections. There is a Fairview website page that contains informational links in regards to proper electronics, hazardous material, and appropriate sorting disposal. Link: (https://fairvieworegon.gov/200/Recycling-Solid-Waste) There were 3 news letter articles published during PY 29 about educational outreach on healthy environment.
C. City Public Outreach	The City uses a variety of communication channels to reach its residents. Examples include its website, print newsletter, social media, earned media etc. Current City public education programs that are related to stormwater include educational programs on stormwater quality and the use of nonpolluting alternative garden products, including low-volume uses of pesticides, herbicides, and fertilizers (e.g., household uses).	Publish stormwater related articles in the City newsletter. Support local education programs.	Track newsletter articles produced annually. Track activities conducted to support local education programs.	Educational Outreach Articles: The City of Fairview utilizes the local monthly newsletter "Fairview Point" to provide educational materials related to stormwater. Applicable articles are as follows: 1. Fairview on the Green Local Outreach Effort: City of Fairview Public Works staff maintained a booth at the "Fairview On The Green" event during the month of July. The booth distributed brochures on stormwater education, healthy streams, low impact development programs, use of pesticides, natural lawn care/gardening techniques, healthy stream temperature, water conservation kits and other stormwater related educational subjects. City of Fairview is currently participating in the Storm drain Cleaning Assistance Program (SCAP) (schools, apartments, industrial/commercial facilities) and the Backyard Habitat Program hosted by the Audubon Society through the City of Gresham. Other agencies that are affiliated with this program are: City of Wood Village and City of Troutdale Large scale public education campaigns: • City of Fairview participated in Public Service Announcement (Do the right thing campaign through an IGA with the City of Gresham) with KOIN 6 TV for broadcast to provide public education services on stormwater quality program.
D. Provide for Public Participation with the annual report, SWMP and Benchmark Submittals	Co-permittees must submit an annual report for the portion applicable to its jurisdiction by November 1 of each year. SWMP revisions and pollutant load reduction benchmarks are required for submittal to DEQ at the permit renewal submittal (180 days prior to permit expiration). Prior to submittal of these items, the City will provide the public with an opportunity to comment on the annual report, revisions to the SWMP and proposed pollutant load reduction benchmarks. The documents will be made available on the City's website or through web links. Comments on the documents will be collected and considered and a response to comments will be provided.	Provide for public participation with the annual report, SWMP and pollutant load reduction benchmarks prior to the permit renewal application deadline.	Annually by November 1	The City will post the new permit's report once the monitoring report is compiled with this matrix for 15 business days.
E. Participate in a Public Education Effectiveness Evaluation	By November 1, 2014, the City of Fairview will coordinate with other local, Phase I jurisdictions to provide information related to an effectiveness evaluation. The effectiveness evaluation information will focus on assessing changes in targeted behaviors and will allow for additional information that can be used in adaptive management of the City's education and outreach strategy. This is where effective evaluation reports will be found as they are submitted.	Coordinate with other local jurisdictions in providing/compiling information regarding a public education effectiveness evaluation by November 1, 2014.	Ongoing	City of Fairview submitted "Public Education Effectiveness Evaluation" report (Schedule A.4, NPDES Permit Term 2010-2015) to DEQ on November 1, 2015.

City of Fairview Stormwater Management Plan (2022-2026)

Control Impacts from Development and Business Activities (CIDBA A-I)				
Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
A. Stormwater Management Manual (SWMM)	This manual contains the regulatory development thresholds that necessitate stormwater controls, the prioritization of green infrastructure, the design standards, plan review process, and long term maintenance requirements.	Review SWMM at least once within the permit cycle. Update, if necessary	Goal for review FY23-24	Ongoing review, a review occurred this PY 30 and no changes were deemed necessary.
B. Private Water Quality Facilities Inspection and Maintenance	Require plans conforming to the requirements of City of Fairview Standard Specifications for Public Works Construction and City of Gresham Stormwater Management Manual at the time of permitting for stormwater facilities related to new private development and redevelopment/retrofitting. Include recording of operations and maintenance plans for stormwater quality facilities.	Ensure new private stormwater facility plans conform to City requirements. Inspect new facilities for conformance to approved O&M plans. Develop a private facility maintenance Standard Operating Procedure within one year of permit issuance.	Track number of inspections conducted and inspection results.	There was 1 site inspections performed with the following results below: Townsend Cold Storage: Underwent inspection simultaneously along with industrial/commercial inspection. The swale and storm systems were working as intended. Inspection passed for stormwater management.
C. Erosion Control Activities	Ordinance 3-1993 adopts an erosion control plan. The ordinance includes an Erosion Control Technical Guidance Handbook (Technical Guidance) that describes regulations, standards and provisions for erosion control as well as fees and penalties for violation. The City enforces the erosion control requirements through a permitting process required for sites disturbing 500 ft ² or more as discussed under the BMP, Development Review. The Technical Guidance prescribes the following four steps to consider in planning for erosion control: Step 1: Identify Site Characteristics Step 2: Lay Out Preconstruction Plan and Proposed Base Measure Step 3: Measures During Construction Step 4: Post Construction Measures The Technical Guidance also has requirements for single-family homes and duplexes on existing lots of record, private developments construction, private construction in public rights-of-way, public works construction, erosion control measures, inspections and enforcements, and penalties. Non-stormwater wastes on construction sites are also addressed through the City's nuisance ordinance in Chapter 8 of the municipal code.	Inform all construction site owners that have 1 acre or more of disturbed land that they are required to obtain a 1200-C permit from DEQ. Projects that disturb more than 500 ft ² are required to obtain a City erosion control permit. Review development sites required to meet City erosion control requirements.	Track the number of erosion control permits issued annually.	A total of zero (0) 1200-C Construction General NPDES Stormwater permits were issued by DEQ during PY 30 for sites disturbing more than 1 acre. A total of sixteen (16) erosion and sediment control permits were issued for sites disturbing less than 1 acre or not qualifying for 1200C requirements.
D. Erosion Control Program Training	The Erosion Prevention & Sediment Control Technical Guidance describes regulations, standards and provisions for erosion control as well as fees and penalties for violation.	Provide a copy of the Technical Guidance to all developers and contractors.	N/A	Erosion Prevention and Sediment Control (EPSC) manuals are made available with the erosion control permit applications during the planning development review process.
E. Development Review for Private Projects	Implement and enforce regulations which give legal authority to: 1) require site-drainage designs and systems which address water quality; and/or 2) minimize the total volume of runoff and the peak rate of runoff, where local conditions permit. The City implements these regulations through its Community Development Department and Public Works Department. New development and redevelopment projects are reviewed for conformance to the following existing City regulations: • Fairview Comprehensive Plan, June 2004 – provides the guiding direction to protect the natural environment and ensure that long-term growth does not adversely affect the natural resources. • Community Development Department–Land Use and Building Permits; Land Use Code Enforcement. • Title 19, Development Code–requires accommodation and treatment of stormwater runoff and system installation conforming to standards and specifications adopted by the City. • City of Fairview Standard Specifications for Public Works Construction	Review development plans for conformance with standards. Maintain map of private water quality facilities	Track acreage of new and re-development activities requiring stormwater treatment annually. Track the number and type of private water quality BMPs built.	There were four (4) development reviews for private stormwater management facilities and one (1) development reviews for public stormwater management facilities in PY 30. Private Stormwater Management Facilities 1. New Office Building Depot Street (.23 Acres): 1 Rain Garden 2. Heidelberg Materials Handling (11.93): 1 Rain Garden 2. Oregon Street SFR (<1 Acres): 1 Rain Garden Public Stormwater Management Facilities 1. Street Improvement 2025: 1 Rain Garden

City of Fairview Stormwater Management Plan (2022-2026)

Activity Name	Description	Measurable Goal	Tracking Measures	Reporting Metrics
F. Review Applicable Code and Development Standards related to Stormwater Management	Review and the City's current stormwater treatment standards for compliance with new MS4 NPDES permit language by January 1, 2014. Update the City's post-construction stormwater design standards and code language. Document the City's post-construction inspection and enforcement response procedures by January 1, 2014	Update the municipal code, design standards and enforcement procedures to eliminate barriers to LID and to implement stormwater management requirements.	Track progress related to the review of the City's code and development standards per provisions in the MS4 NPDES permit.	This requirement has been completed. The City is currently undergoing review and updating its code and development standards as needed to meet the requirements of the permit.
G. Screen Industries/Busi-nesses and Track NPDES Stormwater Permits	Annually, the City will review their business license inventory to determine whether any new facilities would be subject to an industrial stormwater NPDES permit. This determination will occur based on a review of the applicable SIC codes related to the 1200-series NPDES permit. If a facility is identified that would be subject to an industrial stormwater NPDES permit, the facility and DEQ will be notified within 30 days. During industrial and commercial inspections staff will obtain a copy of the facility's permit or work with the facility to either obtain a permit, or eliminate the potential for contact of pollutants with stormwater, thereby eliminating the need for a permit. In cases where discharges appear contaminated, the City will send a copy of the inspection report to DEQ.	Annually notify DEQ of any existing or new industrial facilities within the City's jurisdiction that may potentially be subject to an industrial stormwater NPDES permit.	Track number and type of new facilities identified as needing permits.	Screening process of applicable Industrial/Commercial SIC codes reflecting the 1200-series NPDES permit is being conducted during pre-application review process of land use permit. There were zero (0) new developments and eight (8) existing developments requiring 1200-Z permits during this PY 30. YDO results for the following resulted as having 1200Z permits. • AD Trucking Services • Jacksons Food Stores • South Yard Outdoor Storage • Environmental Works • AGC Heat Transfer • Wildfish Standard Paving • Dirt & Aggregate Interchange • TG Pallet Repair, LLC
H. Industrial and Commercial Facility Inspections	Implement the City's Industrial and Commercial Facility Inspection procedure that is included in the Stormwater Operation and Maintenance Manual to control the discharge of pollutants in stormwater from industrial and commercial facilities to the municipal separate storm sewer system.	Spend 40 hours implementing commercial and industrial inspection procedures. Review and/or inspect all applicable facilities once during the permit term.	Track number of facility inspections and follow-up.	The City inspected one (1) regulated industrial/commercial facilities during this PY 30. Inspection procedures were in conformance and compliance with the City of Fairview's Stormwater Operation and Maintenance Manual and the Columbia South Shore Wellfield Protection Program Reference Manual. A total of 18 inspection hours (pre-documentation, inspection / photos, final documentation and follow up) were spent this PY 30.
I. Retrofit/Hydromodification Assessment Update	City will provide an assessment of how the reports previously provided have been considered, updated, or implemented, remaining gaps of knowledge, if applicable, new goals, tools, priorities for future improvement. Submit report as Appendix to Annual Report.	Provide DEQ an assessment with outcomes related to the creation of the original reports.	Third year of the permit term (FY 22-23)	Appendix A was provided in PY 30. This table will be kept as is until new permit cycle calls for another assessment.