

# Stormwater Management Program



**Plan 2021-2026**



*Adoption Paperwork Added 8/30/2024*

*Major Updates Added 11/24/2025*



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# Executive Summary

The City of Yukon is situated in the North Canadian Watershed. Due to its location, land size and population, Yukon is categorized as a Phase II City under the NPDES (National Pollution Discharge and Elimination System). It spans roughly 27 square miles and is dominated by floodplain. Turtle Creek, Shell Creek and unnamed tributaries form two main drainage basins. Our municipal storm sewer system is a mix of ditches, pipes and storm drains that connect to these drainage basins which both flow to the North Canadian River. Development is limited to about 10 square miles because of the large floodplain area. Much of our residential development occurred in the 1970's and 1980's however, we are currently developing new housing and commercial at a steady pace due largely to our location in a sought-after school district.

Our stormwater program has a dedicated Stormwater Program Manager and is housed in Development Services. It is funded by a monthly fee per water account (based on water meter size). We participate in regional stormwater focus groups whenever appropriate. We cost share with other cities on radio campaigns and other projects that will reach our citizens. We utilize available resources to satisfy the requirements of our OKR04 permit from ODEQ, Oklahoma Department of Environmental Quality.

This Stormwater Management Plan (SWMP) document provides descriptions of all activities that will be conducted on behalf of Yukon from the period of 2021-2026 to meet its obligations under the Oklahoma Department of Environmental Quality's (ODEQ) general permit OKR04 for Phase II Municipal Separate Storm Sewer System Discharges for Small Cities within Oklahoma. This SWMP along with the Notice of Intent (NOI) constitutes the application for coverage under the OKR04 general permit. All six Minimum Control Measures (MCMs) have been addressed in this SWMP. In addition, the City of Yukon has not elected to incorporate the "Seventh MCM" into the SWMP in which the city could have continuous coverage for all future municipal construction activities. Each MCM has several Best Management Practices (BMPs) or "action steps". Appendices summarize the BMPs and provide measurable goals for each BMP, along with descriptions, and implementation schedules.

DEQ has an Oklahoma Pollutant Discharge Elimination System (OPDES) permit program under the OKR10 General Permit for Construction Activities. The City of Yukon has the municipal authority to put "Stop Work" orders on construction sites that allow their crews to create conditions that would violate our permit. However, we hope to foster a cooperative environment with the local development community.

Every reasonable effort has been made to comply with all requirements in the State's OKR04 general permit for small Municipal Separate Storm Sewer Systems (MS4s). To help implement many aspects of the Phase II requirements, particularly regarding public education and public participation, the City of Yukon is working with the Central Oklahoma Stormwater Association (COSWA).

# Introduction: Why Stormwater Management?

## **Goals of the program:**

- *Protect water quality*
- *Reduce the discharge of pollutants to the “maximum extent practicable”*
- *Satisfy the appropriate water quality requirements of the Clean Water Act*

**Why Stormwater Management?** Most communities across the nation “manage” stormwater by directing the water through a system of pipes and ditches that eventually emptied into local tributaries. Little regard has been given to the environmental consequences of the system. Today, better understanding of the impacts of modern lifestyles on water quality has led to the recognition that stormwater is one of the largest contributors to water pollution worldwide. Therefore, a permitting process and regulations have been put in place to help lessen this impact.

Like many other small cities in the State of Oklahoma, the City of Yukon is required to have a permit to discharge stormwater outside the City limits. In order to attain a permit, the Oklahoma Department of Environmental Quality requires that the City develop, implement, and enforce a stormwater management program (SWMP). This program is designed to reduce the discharge of pollutants from our municipal storm sewer system to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act.

**Water Quality Issues** The urban environment and its supporting activities respond to rainfall in a variety of ways. The rain runs off residential yards typically carrying fertilizers, pesticides, and yard waste. Runoff from streets carries dust, heavy metals, oil and grease. Runoff from the commercial and industrial areas conveys a variety of pollutants associated with the activities in these areas. In all urban areas, but particularly where construction is taking place, heavy loads of sediment are washed from the soil stripped of its natural vegetative cover. The runoff and the pollutants it carries are usually conveyed through a system of underground pipes and above-ground open channels until it discharges to a natural stream. Stormwater runoff from lands modified by human activity causes adverse environmental impacts to surface waters by changing stream flows, destroying aquatic habitat and increasing pollutant loadings and concentrations. Runoff often contains sediment, nutrients, metals, pathogens, toxins and oxygen-demanding substances. When these pollutants are carried to streams, rivers, lakes, and wetlands they can impair water quality, cause habitat degradation and threaten beneficial uses of water.

**Typical Pollutants of Concern Found in Stormwater:**

Contaminant	Sources
Sediment	Streets, lawns, driveways, roads, construction activities, atmospheric deposition, drainage channel erosion
Floating trash	Streets, lawns, driveways, roads, construction activities, uncovered dumpsters, littering, single use plastic items
Pesticides & Herbicides	Residential lawns & gardens, roadsides, utility right-of-ways, commercial landscaped areas, soil wash-off
Organic Materials	Residential lawns & gardens, commercial landscaped areas, animal waste, tree leaves, grass clippings
Metals	Automobiles, bridges, atmospheric deposition, industrial areas, corroding metal surfaces, combustion processes, man-made and naturally occurring erosion, dumping & improper disposal of batteries, appliances, etc.
Oil & Grease/Hydrocarbons	Roads, driveways, parking lots, vehicle maintenance areas, gas stations, illicit dumping to storm drains
Bacteria & Viruses	Lawns, roads, leaky sanitary sewer lines, sanitary sewer cross-connections, animal waste, septic systems
Nitrogen & Phosphorus	Lawn fertilizers, atmospheric deposition, automobile exhaust, soil erosion, animal waste, detergents



## History of Stormwater Regulations

A permitting program for stormwater discharges was established under the Clean Water Act as the result of a 1987 amendment. The Act specifies the level of control to be incorporated into the National Pollutant Discharge Elimination System or NPDES stormwater permitting program depending on the source (industrial versus municipal stormwater). These programs contain specific requirements for the regulated communities/facilities to establish a comprehensive stormwater management program or stormwater pollution prevention plan to implement any requirements of the total maximum daily load (TMDL) allocation. There are **two phases**:

- **Phase I** In 1990 the EPA promulgated regulations for establishing water quality based municipal stormwater programs to address stormwater runoff from certain industrial and construction activities and from medium and large municipal separate storm sewer systems serving populations of 100,000 or greater. These "Phase I" regulations were incorporated into the existing NPDES permit rules that address point source dischargers. As a result, urban non-point source runoff became regulated as a point source.
- **Phase II** On December 8, 1999, EPA published final regulations that address urban stormwater runoff from cities under 100,000 population and counties that lie within the Urbanized Area as defined by the latest US Bureau of Census designation or otherwise designated by DEQ as being required to obtain coverage under the State's Phase II Stormwater Program. DEQ has primary jurisdiction over permitting and enforcement of the Phase II Stormwater Program for Oklahoma. On February 8, 2005, DEQ finalized their General Permit (OKR04) for Phase II Small Municipal Separate Storm Sewer System Discharges within the State of Oklahoma.



# Oklahoma Water Quality Standards

**Oklahoma Water Quality Standards:** The foundation of Oklahoma's water quality protection efforts is its standards. Oklahoma's Water Quality Standards are a set of rules adopted by Oklahoma in accordance with the federal Clean Water Act. The standards provide a baseline against which the quality of waters of the state are measured. The Oklahoma Department of Environmental Quality (DEQ) holds the statutory authority to develop the standards. These standards serve a dual role: they establish water quality baseline and provide a basis for the development of water-quality based pollution control programs, including discharge permits. The standards comprise three components: beneficial uses, criteria, and anti-degradation policy. For more information on Oklahoma's Water Quality Standards contact the DEQ Water Quality Division at (405)702-8100.



**Beneficial Uses:** Beneficial use of water is a fundamental requirement in the administration of water rights. Beneficial uses are the ways in which water is used by humans and wildlife. They include agriculture, irrigation, drinking water supply, hydroelectric power generation, municipal, industrial, navigation, recreation, and fish and wildlife propagation.

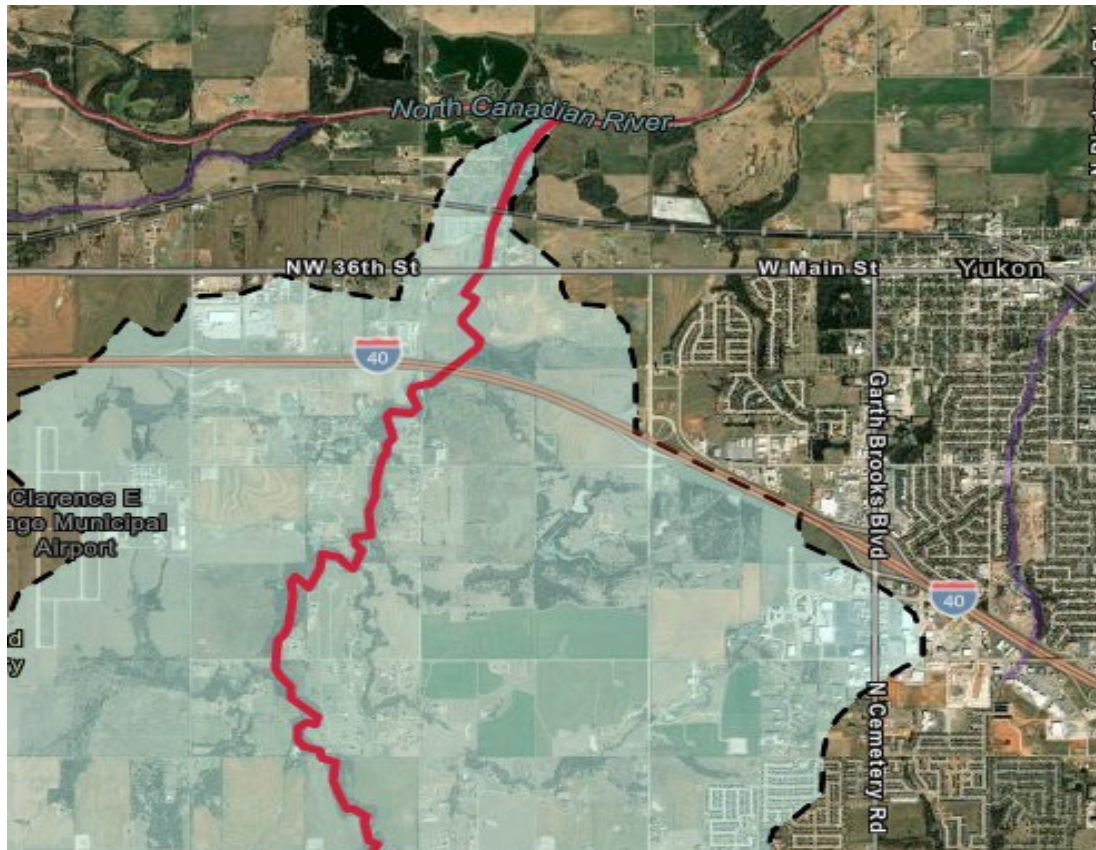
**What constitutes impairment?** Determining impairment is a complicated process. All water bodies that violate water quality criteria are not considered impaired. For scientific and legal purposes the following definition is most often used: *Water quality is the ability of a water body to support all appropriate beneficial uses.* If water supports beneficial use, water quality is said to be good or unimpaired. If water does not support beneficial use, water quality is said to be poor or impaired.

# Waterbody Impairments

The 303(d) list of impaired streams includes waterbodies that are determined to be impaired by specific pollutants and require the development of Total Maximum Daily Loads (TMDLs) to restore water quality. These streams are identified by the state and are subject to stricter regulations to ensure they meet the Clean Water Act's standards. The list is a critical component of the NPDES stormwater permit program and is used to guide the development of TMDLs and the implementation of stormwater management practices to reduce pollution.

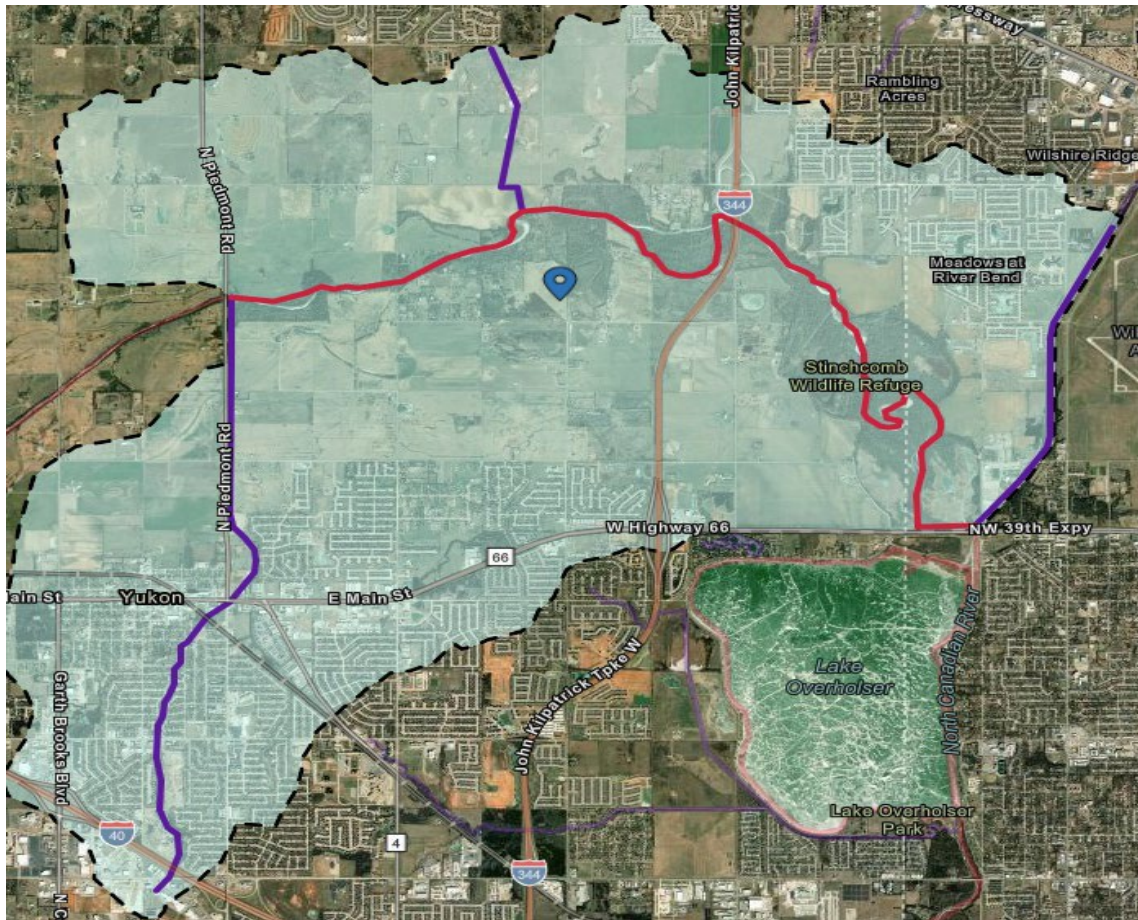
**303d List Impaired waterbodies in Yukon Jurisdiction:** Special activities have been implemented to target impairments in receiving waters on the State's 303d list. The two waterbodies listed below are receiving waters impacted by Yukon's drainage system.

	Waterbody Name	Waterbody ID (WBID)	Impairment Causes
1	Shell Creek	OK520530000030_00	Enterococcus, E. Coli,
2	North Canadian River	OK520530000010_00	Enterococcus, E. coli, D.O



Shell Creek, WBID OK520530000030\_00, is shown in red.





North Canadian River Segment, WBID OK52053000010\_00, is shown in red.

### **North Canadian River Watershed**

The North Canadian River Watershed is made up of predominately small grain crops (43 percent), grassland (20 percent), and row crops (14 percent). Residential and commercial/industrial land use are insignificant, accounting for less than 2 percent in both the North Canadian River and Shell Creek watersheds.

The temporal and spatial severity of bacteria loading is difficult to demonstrate along the entire reach of the North Canadian River given the size of the watershed, the lack of data from Water Quality Monitoring (WQM) stations on the main stem of North Canadian River, and no bacteria data from tributaries to the North Canadian River. With no Enterococci data upstream at USGS gage station 07239450 to compare to the downstream WQM station OK52053000010-001AT, it is difficult to determine conclusions and relationships between bacteria concentrations and source contributions along the North Canadian River.

## **Shell Creek Watershed**

The Shell Creek watershed is composed of grassland (19 percent), small grain crops (59 percent), pastureland (13 percent), and forest (4 percent). Residential and commercial/industrial land use are insignificant, accounting for less than 2 percent in both the North Canadian River and Shell Creek watersheds.

The consistent percentage of water quality criterion exceedances noted in the TMDL report of Shell Creek, regardless of the bacteria indicator, suggests that the temporal and spatial severity of bacteria loading is significant and chronic and may be a function of the small size of the watershed and the low or intermittent flow.

### **Pollutant sources**

Possible major nonpoint sources contributing to fecal coliform in the Shell Creek and North Canadian River Watersheds include wildlife, agricultural activities, domesticated animals, land application fields, urban runoff, and failing onsite wastewater disposal (OSWD) systems. Bacteria associated with urban runoff can result from humans, wildlife, livestock, and domestic pets. Runoff from urban areas, whether permitted or not, under the MS4 program can be a significant source of fecal coliform bacteria. Agricultural activities and other nonpoint sources of bacteria are unregulated. Voluntary measures and incentives should be used and encouraged wherever possible and such sources should strive to attain the reduction goals established in the TMDL.

### **Significant Pollutants identified for North Canadian River & Shell Creek Watershed**

1. Sanitary Sewer Overflows
2. Wildlife
3. Septic Systems
4. Domesticated animal waste
5. Livestock
6. Illegal Dumping
7. Wastewater connections to storm sewer
8. Malfunctioning Lift Stations
9. General Construction Site mismanagement
10. Accidental spills of pollutants
11. Leaking Dumpsters
12. Agricultural activities
13. Land application fields
14. Urban runoff

# TMDL Implementation

## **Total Maximum Daily Loading (TMDL)**

The TMDL program is targeted at impaired waterbodies. A total maximum daily load is the total amount of a pollutant that a given water body can contain and still meet state water quality standards. Think of it as a pollutant diet. The term also describes the process of calculating such a load and allocating portions of the load to various sources of pollution in the study area. The main goal of the TMDL is to identify pollutant sources and to recommend the reductions necessary to meet applicable water quality standards.

Stormwater discharges are highly variable both in terms of flow and pollutant concentration, and the relationship between discharges and water quality can be complex. For municipal stormwater discharges, the current use of system-wide permits and a variety of BMPs, including educational and public outreach BMPs, does not easily lend itself to the existing methodologies for deriving numeric water quality-based effluent limitations. These methodologies were designed primarily for wastewater discharges which occur at predictable rates with predictable pollutant loadings under low flow conditions in receiving waters.

## **North Canadian River Bacteria TMDL Implementation:**

The City of Yukon submitted a request to be exempt from the North Canadian River TMDL for the pathogen indicator bacteria fecal coliform and *Escherichia coli* (*E. coli*), implemented near our area as none of the waterbodies identified in the TMDL are in Yukon City Limits. On March 6, 2025, the city received a denial letter from DEQ on the exemption request. After this letter was received, the city had two meetings with DEQ to discuss the next course of action.

On August 18, 2025, Yukon and DEQ came to an agreement regarding TMDL implementation of the North Canadian River. Even though the waterbodies identified in the TMDL are not in Yukon Jurisdiction, the city cannot be exempt because Yukon is part of the North Canadian River Watershed and therefore a contributor of the pollution.

To comply with TMDL permit requirements, a baseline monitoring plan has been set up for outfalls leaving the city limits. Quarterly sampling for *E.coli* will be taken during Primary Body Contact Period (PBCP) (May 1-September 30). The sample must be taken within 30-60 minutes of a rain event. If there is not a rain event during that period, the baseline monitoring plan will note "No Discharge".

The elevated levels of pathogen indicator bacteria in aquatic environments indicate that receiving waters are contaminated with human or animal feces and that there is a potential health risk for individuals exposed to the water. Because of this risk, BMPs have been implemented.

To ensure compliance with the TMDL requirements under the MS4 permit, MS4 permittees must develop strategies designed to achieve progress toward meeting the reduction goals established in the TMDL. Relying primarily upon a Best Management Practices (BMP) approach, permittees should take advantage of existing information on BMP performance and select a suite of BMPs appropriate to the local community that are expected to result in progress toward meeting the reduction goals established in the TMDL.

#### **North Canadian River Bacteria TMDL BMPS:**

- Annual targeted letter to Legacy Lakes HOA & Valley George Townhomes on the importance of picking up pet waste.
- Annual targeted letter to all septic system owners within Yukon's municipal boundary which includes information about a grant program for septic system repairs.
- Wet weather testing at Legacy Lake or other outfalls nearby during PBCP.
- Illicit discharge reporting and investigation.
- Social media posts regarding picking up after pets and preventing stormwater pollution.
- Annual rain barrel sale and giveaway.
- Sewer line maintenance/sewer flushing.
- Prioritize sanitary sewer and lift station inspections in the TMDL area.
- Increase street sweeping in the TMDL area.

#### **Shell Creek Bacteria TMDL BMPS:**

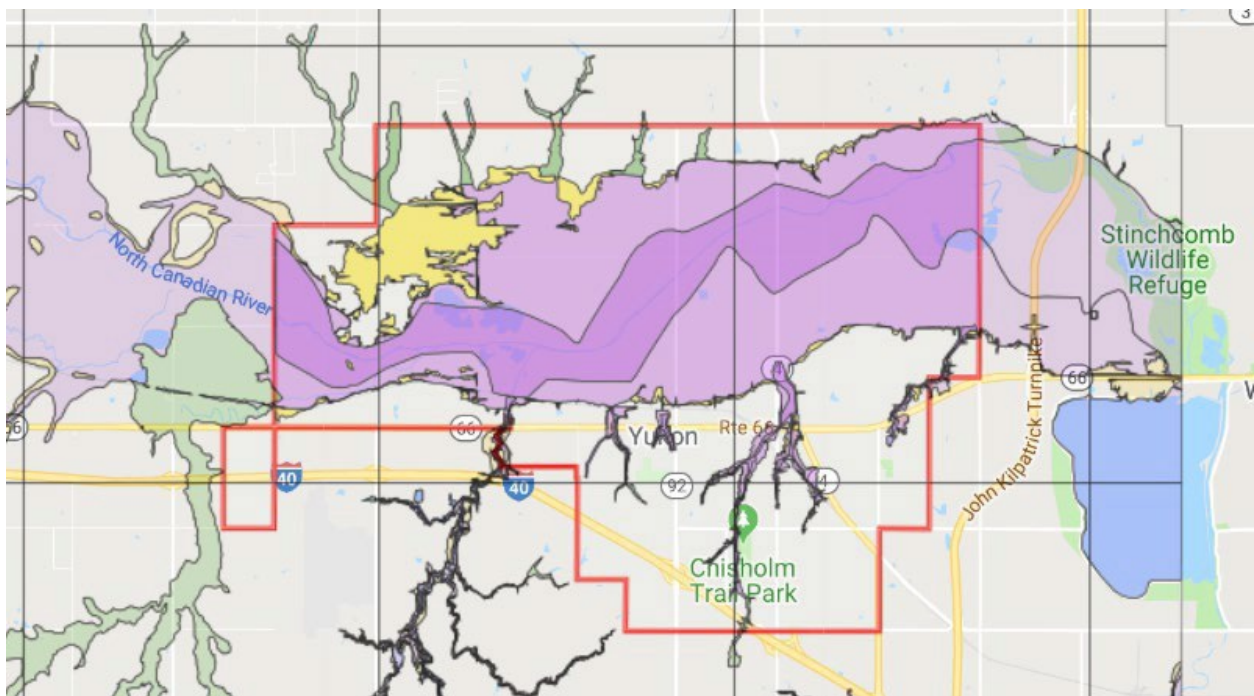
- Annual targeted letter to all septic system owners within Yukon's municipal boundary which includes information about a grant program for septic system repairs.
- Wet weather testing at outfalls during PBCP.
- Illicit discharge reporting and investigation.
- Social Media posts regarding picking up after pets and preventing stormwater pollution.
- Annual rain barrel sale and giveaway.
- Sewer line maintenance/sewer flushing.
- Increase street sweeping in the TMDL area.

# Understanding Yukon's Drainage

Yukon is a railroad town that was built in 1891 before Statehood. The original town site was roughly 100 acres, which is less than a square mile. Over the years it grew to be roughly 27 square miles. The area was famous for flour mills and grain storage. The predominant land use and zoning is agricultural since more than half of our city limits is floodplain. The rest is a healthy mixture of commercial and residential, mostly single family housing.

Yukon shares much of its western border with Canadian County and is bordered on the other three sides by Oklahoma City. There are two drainage basins within the City limits that flow into the North Canadian River watershed. Our MS4 is a series of ditches, concrete channels, pipes and streams. We frequently manage runoff in subdivisions by adding detention and retention ponds. There are large expanses of land in the floodplain area with only drainage swales instead of curb and gutter.

***In the graphic below, Yukon City limits is outlined in red, the floodplain is shaded purple.***



**Dry Weather Field Screening:** The Stormwater Manager records the physical condition of our drainage outfalls on an annual basis during dry weather. This is called Dry Weather Field Screening. We monitor several locations that are listed on our outfall map. Generally, we want to be aware of where water is entering and leaving our City limits. This way we can point source track pollutant sources to see if it is our responsibility to remediate issues or if they are starting outside of our City limits. According to our 2021 Dry Weather Field Screen Program Map, we had 30 outfalls within our City Limits. Outfalls are not clearly defined by the State but they are usually near the City limits. There were 6 potential testing spots identified.

In 2022, we defined an outfall and reduced the number of outfall locations to 10 with two creeks to check on, because the previous list had many sites that were not safely accessible by staff. When we updated the map in 2023, we decided to add 2 more locations that met the definition. No one could explain what the previous ID numbers meant and that created confusion, so we modified the list to include only outfalls that met our definition. **Outfall** is a place where stormwater from our MS4 leaves Yukon city limits (as defined by City of Yukon since there is no state or federal legal definition yet).

Replaced	ID #	Outfall Location	Landmarks	Safe to Park
3144-001	1	The Commons Medical Plaza	Off 10 <sup>th</sup> Behind Target	Parking lot
3144-003	2	Creek West of Oil Well on 10th	Off 10 <sup>th</sup> Behind Target	Oil well drive
New site	3	East of Jamesons on 10th	By Big Blue Dinosaur	Parking lot
3344-003	4	Corner of 10 <sup>th</sup> & S Yukon Pkwy	Street & Storm drain	No
3344-004	5	Near Stonemill Neighborhood	Dumps into creek across Yukon Pkwy	Stonemill median
3344-002	6	Near 3 <sup>rd</sup> Pond at Legacy Lakes	Dumps into creek across Yukon Pkwy	Legacy Lakes
3445-001	7	Behind SW Covenant School	Goes into creek	School
New	8	Westminster	Near Canterbury (concrete flume)	On Street
3445-003	9	Regal Rd	Near Camelot (Concrete flume)	On Street
3445-004	10	Regal Rd	Near Excaliber Court (Concrete flume)	On Street
New	11	Regal Rd	S of Lancelot (concrete flume)	On Street
New	12	Dawn Ave & Morningside Dr (concrete flume)		On Street
New site	13	Eastridge & Amanda	(Concrete flume)	On Street
New site	14	E Wagoner Road	Sara & Wagner	On Street

# Allowable Discharges & Conditions

**Most non-stormwater discharges to the MS4 are prohibited. However, the following discharges and are considered allowable discharges by DEQ:**

- a. diverted stream flows;
- b. uncontaminated discharges from riparian areas and wetlands;
- c. uncontaminated ground water or spring water;
- d. residential building wash water that does not use detergents, solvents, and/or soaps;
- e. uncontaminated pumped ground water;
- f. uncontaminated ground water infiltration;
- g. uncontaminated discharges from potable water sources, including water line flushing and fire hydrant flushing;
- h. foundation drains;
- i. air conditioning condensate;
- j. water from crawl space pumps;
- k. footing drains;
- l. residential, non-commercial, and charity car washing;
- m. landscape irrigation and lawn watering, provided all pesticides, herbicides, and fertilizers that have been applied in accordance with the approved manufacturers' instructions and/or labeling;
- n. uncontaminated and dechlorinated swimming pool discharges;
- o. street wash water, including wash water generated from the washing of other impervious surfaces such as sidewalks and parking lots, that does not use detergents, solvents, and/or soaps;
- p. discharges in compliance with a separate Oklahoma Pollutant Discharge Elimination System (OPDES) or National Pollutant Discharge Elimination System (NPDES) permit;
- q. discharges of gray water from municipal splash pads (aka, spray parks or spray grounds), as defined in 27A O.S. § 2-6-107, unless otherwise permitted or regulated by DEQ, provided the discharges comply with all applicable municipal or county

ordinances enacted pursuant to law (discharges from recirculating systems shall be dechlorinated); and

r. discharges or flows from emergency firefighting activities or training activities that are not taking place at a permanent facility, provided procedures are in place for the Incident Commander, Fire Chief, or other on-scene firefighting official in charge to make an evaluation regarding potential releases of pollutants from the scene.

**Non-stormwater discharges are authorized only under the following conditions:**

a. Discharges are insignificant sources of pollutants to your small MS4 because of the nature of the discharges or because of the conditions you have established for allowing these discharges to occur. See below for list:

- Power-washing is allowed as long as BMPs are in place to keep wash water out of the street and storm drains. Low phosphorus, bio-degradable soap must be used if being directed to a grassy area. De-watering BMPs preferred unless job is cleaning a street or sidewalk. If no soap or solvent used, the discharge can be allowed.
- Charity car washes are encouraged to use low phosphorus, bio-degradable soap though we have no permitting process due to the nature of activity.

b. Document in your SWMP any local controls or conditions placed on discharges.

c. Include a provision in your SWMP prohibiting any individual non-stormwater discharge that is determined to be contributing significant amounts of pollutants to your MS4.

d. Discharges mixed with non-stormwater are unauthorized unless such discharges are in compliance with a separate OPDES or NPDES permit, or determined not to be a substantial contributor of pollutants to waters of the State in accordance OKR04 permit.

e. Discharges associated with industrial activity are unauthorized.

f. Stormwater discharges associated with construction activity, are unauthorized except as provided by this permit.

e. Stormwater discharges currently covered under another permit are unauthorized.

f. Discharges exceeding water quality standards are unauthorized.

g. DEQ may require corrective action or an application for an individual permit or alternative general permit if a small MS4 is determined to cause, have the reasonable potential to cause, or contribute to an exceedance of water quality standards.

h. Discharges not consistent with a TMDL are unauthorized. Discharge of a pollutant into any water for which a TMDL, or watershed plan in lieu of a TMDL, for that pollutant has



been either established or approved by DEQ or U.S. Environmental Protection Agency (EPA) is prohibited unless your discharge is consistent with that TMDL, or watershed plan.

i. Discharges originating on Indian Country are unauthorized. Stormwater discharges from MS4s or construction activities occurring on Indian Country, are not under the authority of DEQ and are not eligible for coverage under this permit. If discharges of stormwater require authorization under federal NPDES regulations, a permit for these discharges must be obtained from the EPA.

j. Discharges of material resulting from a spill are unauthorized. If discharges from a spill are necessary to prevent imminent threat to human life, personal injury, or severe property damage, the permittees have the responsibility to ensure the party responsible for the spill takes reasonable and prudent measures to minimize the impact of discharges on human health and the environment. These responsibilities may be in the form of a spill prevention and response plan or through implementation and legal enforcement of other BMPs developed to satisfy the MCMs.

# Basic Permit Requirements

**The program must include the following basic components:**

- Responsible party – Stormwater Program Manager
- Two Stormwater inspectors certified in Erosion & Sediment Control Inspections
- Compliance with water quality standards
- Stormwater Management Plan
- Program plan review
- Creation of stormwater management related ordinances
- Stormwater pollution prevention plans for municipal projects
- Six minimum control measures (MCMs)
- Best management practices (BMPs)
- Measurable goals for each BMP
- Rationale for selected BMPs & measurable goals
- Public participation & education
- Inspection procedures (including dry weather field screening)
- Construction Inspection Program
- Quarterly Facilities Inspections
- Annual Report
- Annual evaluation of BMPs
- Appropriate provisions for any special requirements
- Dry weather field screening

**Special Requirements:** 303d listed Receiving Waters Program

	<b>Best Management Practices</b>	<b>Metric for Activity</b>
<b>a</b>	Identify significant non-stormwater discharges of 303d pollutants.	9 significant pollutants identified on 10/2019. Additional pollutants were identified on 10/2025
<b>b</b>	Conduct pollutant source inspections in 303d high priority areas.	Sanitation inspects 27 known trouble sites monthly
<b>c</b>	Create map for above priority areas. (1 map created)	Report modifications to map
<b>d</b>	Control Pollution from sanitary sewer overflows and bypasses. (report pipe bursting, raising manholes, etc.)	Report amount in linear ft of pipe bursting and amount of man-holes raised
<b>e</b>	Address pollution from on-site sewage systems ( Send out targeted mailing to mapped septic owners.)	Report amount of targeted mailings to septic owners.
<b>f</b>	Fix issues at Municipal Facilities identified in 2020 Audit (Sanitation & Maintenance Yard / 1 per yr.)	Report issues fixed.

# New Permit Cycle 2021-2026 Changes

## **General Requirements For Phase II, Category 2 Cities Pertaining to Yukon:**

**MCM 1:** Implement & enforce a program (once per year) to distribute information and promote behavior change to reduce pollutants in stormwater discharges to your MS4:

1. Education & involvement efforts shall identify an appropriate target audience.
2. In coordination with MCM2: Implement an education and Involvement program for local industries and conduct staff training. **NOT APPLICABLE**
3. In coordination with MCM 3: Implement an education & involvement program for public employees, business, and the general public. Promote, publicize, facilitate the reporting of illicit discharges and conduct staff training.
4. In coordination with MCM 4: Implement an education and involvement program for the local development community. Implement and enforce procedures for the receipt and consideration of information submitted by the public and conduct staff training.
5. In coordination with MCM 5: Implement an education & involvement program for developers and the public.
6. In coordination with MCM 6: Conduct staff training.
7. Include a process to receive and review public comments on your SWMP.
8. Comply with state and local public notice requirements when implementing your program.
9. Make your records, including the NOI and SWMP, available to the public.
10. If you discharge to waters identified on the 303 (d) list of impaired waters, your program must be directed toward entities likely to have a significant stormwater impact on those impaired waters.
11. Must have 4 Public Education & 2 Public Involvement Activities per year

## **MCM 2: NOT APPLICABLE TO CATEGORY 2 CITIES**

**MCM 3:** Implement & enforce a program to detect and eliminate illicit discharge into your MS4:

1. Incorporate dry weather field screening (DFWS) procedures.
2. Implement & enforce ordinances.
3. Maintain a storm sewer system map.
4. Maintain a list of occasional incidental non-stormwater discharges.
5. DFWS at outfalls 40% per year, DFWS at high priority areas once per year.

**MCM 4:** Implement & enforce a program to reduce pollutants in stormwater runoff from stormwater runoff from construction activities that discharge into your MS4:

1. Implement and enforce ordinances.
2. Implement and enforce procedures for site plan review.
3. Implement and enforce procedures for site inspection and enforcement.
4. Inspect all permitted sites over an acre in size once a month due to criteria that require a monthly inspection frequency.
5. Inspect all permitted sites under an acre in size quarterly to confirm the site is in compliance with Yukon's Erosion & Sediment Control Ordinance.

**MCM 5:** Implement & enforce a program to address stormwater runoff from new development and redevelopment projects that discharge into your MS4:

1. Implement and enforce ordinances.
2. Implement and enforce procedures to ensure adequate long-term operation and maintenance of BMPs.
3. Identify and remove legal/regulatory barriers to LID; identify and implement opportunities to implement LID.
4. Assess street and parking lot designs/guidelines and implement LID options.
5. Review Landscape plans submitted to the city to confirm that they meet Yukon's Landscape requirements. Inspect landscape once the construction is completed.

**MCM 6:** Implement & enforce an operation and maintenance program to prevent or reduce pollutant runoff from MS4 operations:

1. Maintain an inventory of MS4 operations.
2. Maintain a list of MS4 facilities subject to the OKR05 permit.
3. Implement and enforce procedures to control, reduce, or eliminate discharge of pollutants from MS4 operations.
4. Implement and enforce procedures to ensure new flood management projects are assessed for impacts on water quality.
5. Implement contractor requirements and oversight.
6. Implement and enforce procedures for inspection and maintenance for BMPs.
7. Site Inspections at OKR05 sites: once per quarter
8. Site Inspections at MS4 Facilities: once per year

# Six Minimum Control Measures (MCMs) and Best Management Practices (BMPs)

**Six Minimum Control Measures:** The DEQ requires the use of six minimum control measures in the creation of stormwater management and pollution prevention programs.

- 1. **Public Education & Involvement**
- 2. **Industrial Stormwater Runoff Control** (not applicable to City of Yukon at this time)
- 3. **Illicit Discharge Detection and Elimination**
- 4. **Construction Runoff Management**
- 5. **Post-Construction Runoff Management**
- 6. **Municipal Good Housekeeping**

**Best Management Practices:** For each of the minimum control measures listed above, the City of Yukon will implement an average of ten (10) best management practices, develop implementation schedules, and establish measurable goals. Best management practices are activities that the City chooses to fulfill permit requirements. There are no specific BMPs required nor are there a certain number of BMPs required, however it is expected that there will be a range of BMPs offered for each of the six minimum control measure categories. The tables listed in Appendix A are used as a checklist but also as a reporting tool for the annual report. We follow a fiscal year reporting cycle. Items with a (\*) star beside the number are part of the extra activities that we implement to reduce pollution in 303d listed receiving waters.



YUKON STORMWATER ANNUAL SCHEDULE FOR PUBLIC OUTREACH					Created 2019
	Topic	Season /Month	Event	Activity Type	Outreach Type
1	Resolutions for Cleaner Water (pick up after pets, recycle, generate less waste, use less chemicals, reusable bags, create new habits, volunteer)	January	no	Pub Ed	Website and social media
2	Home and Garden Show	Jan	yes	Pub Ed	COSWA Booth
3	Rain Barrel Sale	Jan/Feb/Mar	yes	Pub Part	Flyer (utility bill), Social Media, Press Release, website
4	Commercial Businesses BMPs flyer	April	no	Pub Ed	Targeted mail-out with bus license renewals
5	Eco Tips (rain barrels, rain gardens, planting natives, composting, clean out gutters, pet waste )	Spring	no	Pub Ed	Social Media, website
6	Eco Tips (mowing, ozone, pools, boating, washing vehicles)	Summer	no	Pub Ed	Social Media, website
7	Eco Tips (leaves, vehicle maintenance, garage clean out HHW reminder)	Fall	no	Pub Ed	Social Media, website
8	Community Clean Up (Earth Day event)	Spring	yes	Pub Part	Flyer (utility bill), Social Media, Press Release, website
9	Watershed Awareness at Festival of Child	May	yes	Pub Ed	Social Media, Press Release, website
10	How to drain pools flyer/graphic	August		Pub Ed	(social media, target neighborhood associations)
11	Septic Tank Maintenance flyer	September	no	Pub Ed	Targeted mail-out to homes that are on septic systems
12	Recycling Event at Sanitation	November	yes	Pub Part	Flyer (utility bill), Social Media, Press Release, website
13	Restock Brochure Racks	Jan / July	no	Pub Ed	Library, Com Center, Dev Serv

## 1. Public Education, Participation & Outreach

Permit Requirements: Develop and implement a plan to encourage public education, involvement and participation in the creation of a stormwater management program. Develop and implement a process by which public comments are received and reviewed by program manager. Make the stormwater management plan and the notice of intent available to the public. Comply with State and Local public notice requirements when implementing the program. Distribute information and educational materials to the community and to conduct outreach activities related to the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants. As a category 2 city, we will be required to offer 4 public education and 2 public participation events per year.

Rationale: An informed community is essential for the success of the Stormwater Program. Selected best management practices are intended to increase the community's understanding of sources and environmental impacts of stormwater pollution and ways to reduce the amount of pollutants. The goal is to encourage behaviors and practices which will result in environmental benefit for the community.

Action: A multi-media approach will be used in Yukon's program: brochures, website, social media outreach, education programs at appropriate events. Radio and television outreach will be included when possible through regional partnership efforts. The City of Yukon's program will also sponsor, organize or facilitate public events and public meetings. Our marketing department creates most of our public outreach graphics including seasonal PSA's or event-related flyers. We partner with COSWA on radio commercial opportunities and events. Hard copies of all media pieces are kept in a binder titled "Brochures" in the Stormwater Program office.

The following chart shows what activities we do each month to meet this BMP.

Month	Activities Calendar
January	<ul style="list-style-type: none"> <li>• Post Winter Eco-tips on social media</li> <li>• Home Show w COSWA at State Fairgrounds</li> <li>• Stock Library and City Hall brochure racks</li> <li>• Advertise Rain Barrel Sale</li> <li>• Provide SW Training to Public Works Employees</li> </ul>
February	<ul style="list-style-type: none"> <li>▪ Collect info about projects and possible clean up</li> <li>▪ Prepare for upcoming events</li> </ul>
March	<ul style="list-style-type: none"> <li>• SW Booth at Trout Fish Out put on by Parks</li> <li>• Rain barrel sale pick up event</li> <li>• Post Spring Eco Tips on social media</li> </ul>
April	<ul style="list-style-type: none"> <li>▪ Community Cleanups</li> <li>▪ Recycling Event and Rain Barrel drawing</li> <li>▪ Send out Commercial License renewals with outreach letter</li> <li>▪ Send out letters to registered pool owners</li> </ul>
May	<ul style="list-style-type: none"> <li>▪ Post Summer Eco Tips on social media</li> <li>▪ Festival of the Child Public Outreach Event</li> </ul>
June	<ul style="list-style-type: none"> <li>▪ Discuss program in public meeting - City Manager comments</li> <li>▪ COSWA meeting</li> <li>▪ Look for unfinished BMPs</li> </ul>
July	<ul style="list-style-type: none"> <li>▪ COSWA &amp; Oklahoma Floodplain Managers Annual Joint Workshop</li> <li>▪ Prepare Annual Report</li> <li>▪ Evaluate BMPS</li> <li>▪ Update Stormwater Plan and website as needed</li> </ul>
August	<ul style="list-style-type: none"> <li>• Conduct Dry weather field screening</li> <li>• Post flyer about draining pools on social media</li> <li>• National Stormwater Conference (continuing education)</li> </ul>
September	<ul style="list-style-type: none"> <li>▪ Septic Tank Month (send out targeted mailing)</li> <li>▪ Post Fall Eco Tips on social media</li> </ul>
October	<ul style="list-style-type: none"> <li>▪ Inspection Staff training OKC's Annual Construction Workshop</li> <li>▪ Schedule Employee Training (with Public Works)</li> <li>▪ SW Booth at Employee Health Fair</li> </ul>
November	<ul style="list-style-type: none"> <li>▪ Big Trash Event</li> <li>▪ Recycling event w Rain Barrel drawing</li> </ul>
December	<ul style="list-style-type: none"> <li>▪ Prepare flyer for Rain Barrel Sale through Marketing &amp; Utilities</li> </ul>

## 2. Industrial Stormwater Inspections

This BMP is only required for MS4's over 50,000 population; therefore it is not applicable to Yukon at this time.

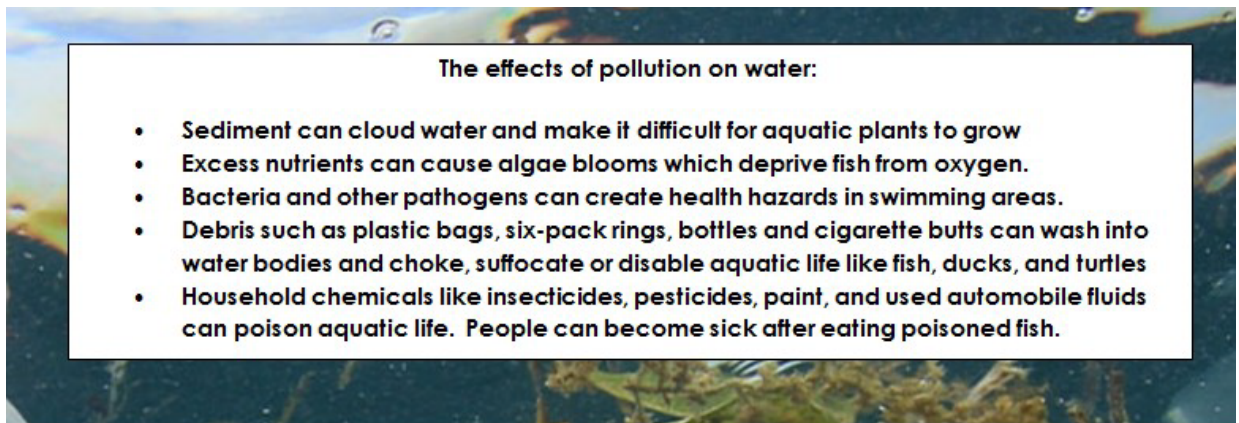
## 3. Illicit Discharge Detection and Elimination

Permit Requirements: Develop, implement and enforce a program to detect and eliminate illicit discharges into MS4, including a dry weather field screening program to identify non-stormwater flows and illegal dumping. Develop a storm sewer map, showing the location of all outfalls and the names and location of all waters of the state that receive discharges from those outfalls. Prohibit non-stormwater discharges into MS4 system by implementing appropriate enforcement procedures through ordinances and regulatory mechanisms for violations. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Develop a list of occasional incidental non-stormwater discharges or flows that will not be addressed as illicit discharges. Respond to complaints within 72 hours.

Rationale: Mapping the stormwater sewer and drainage system will allow us to become more familiar with the physical realities of our water flows. Creating ordinances prohibiting non-stormwater discharges will provide us local regulatory controls.

Action: The City of Yukon has developed a GIS mapping program and will continue to utilize this program to assist in detecting and eliminating illicit discharges. We will continue to do outreach, respond to complaints, conduct Dry Weather Field Screening on 40% of our outfalls each year, point source track and resolve issues. We will send out targeted mailings to address pollutants of concern such as swimming pools and improper septic tank maintenance. We will continue to work to improve municipal operations.

Spills: Large spills are handled by the Fire Department since they are HAZ-MAT trained annually. The Stormwater Program supplements spill clean-up materials each year.





#### **4. Construction Site Stormwater Runoff Management**

Permit Requirements: Develop, implement and enforce a program to reduce pollutants in any stormwater runoff to MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges.

Rationale: This measure is to provide education and enforcement to ensure that construction sites implement BMPs to reduce the amount of pollutants in stormwater.

Action: The City will review and amend existing ordinances if needed to include regulations to control the stormwater runoff from construction sites that disturb greater than or equal to one acre, including projects less than one acre that are a part of the larger common plan of development or sale that discharge into the City's MS4. The program must ensure that controls are in place that would minimize water quality impacts. Sections shall address erosion control, stormwater pollution, permit requirement, plan reviews, penalties and BMPs.

Inspection and Enforcement Procedures: Inspections and referrals for construction sites can be made by building inspectors, code enforcement and stormwater staff. Inspections will also be conducted in response to citizen complaints. We will strive to foster cooperation and support from the local development community.

#### **5. Post-Construction Runoff Management**

Permit Requirements: Develop, implement and enforce a stormwater runoff program to address new development and structural and or non-structural best management practices appropriate for the community. Create ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects. Ensure adequate long-term operation and maintenance of best management practices.

Rationale: The goal of this measure is to reduce the amount of stormwater runoff created by the footprint of new development and to increase stormwater infiltration where possible.

Action: The City of Yukon will review ordinances for barriers to low impact development. The City will evaluate and attempt to preserve open spaces, map out areas with existing drainage swales, make efforts to increase tree coverage, encourage stream bank stabilization, and encourage retrofits of existing properties where possible.

## **6. Municipal Good Housekeeping**

Permit Requirements: Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from MS4 operations. Develop and use training materials for employees training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances and stormwater system maintenance. Inspect City facilities.

Rationale: Municipalities that take a proactive approach to Stormwater Management are less likely to be contributors to pollution in their own MS4s.

Actions: Employee Training will be offered. The City will inventory municipal operations and activities that contribute to stormwater pollution, assess infrastructure improvements needed, etc. Activities that result in measurable pollution reduction such as street sweeping will be tracked. Municipal facilities will be inspected once per year unless they are permitted facilities and then they will be required to submit quarterly inspection reports to Stormwater Dept.

# Program Management

## City of Yukon Stormwater Program Organizational Chart



- **City Manager** oversees municipal operations and is authority over all city staff and controls municipal budget. City Manager answers to City Council.
- **Public Information Officer & Marketing Department** assist with developing public outreach campaigns, brochures, graphics, utility flyers & all marketing (located in City Manager's office).
- **Assistant City Managers:** oversee municipal operations
- **Development Services Director** Development Services is made up of administration & permitting staff, building inspection, code enforcement, grant writing, planning staff, stormwater and GIS. Some City Planning & Engineering services are contracted out.
- **Stormwater Program Manager** manages SW Program, prepares plans, coordinates public education & public participation, prepares annual reports, conducts inspections & dry weather field screening, maintains database of reports, reviews plans, etc.
- **Senior Building Inspector** is the primary building inspection official, also has stormwater inspection & code enforcement duties. Assists SW as needed.
- **City Inspectors perform** building inspection duties. Assists SW as needed.
- **Code Enforcement Inspectors** have designated areas. Assist SW as needed.
- **Public Works Director** oversees Sanitary Sewer, Drainage Maintenance, Street Dept
- **Public Works Crews** Street Department cleans out storm drains and does projects such as installing sewer and water lines and making repairs, operate street sweeper. Sanitation provides big trash day annually and operates recycling center. Utility crews discover, report and reverse illicit connections.
- **Sanitation Department** provides trash services, maintains recycling facility, holds recycling events and big trash events.

# Program Costs

**Projected Budget** A budget supporting current needs and activities is prepared annually. Stormwater fees are based on water meter size because the collection system was already in place and it shows type use and relative size associated with the user. The average residential user pays \$2.00 per month. **Stormwater Fees** are listed below:

Stormwater Fees / Per Month		
	Water Meter Size	Fee
1	5/8"	\$2.00
2	3/4"	\$2.00
3	1"	\$2.96
4	1 1/2"	\$4.38
5	2"	\$6.48
6	3"	\$9.59
7	4"	\$14.19

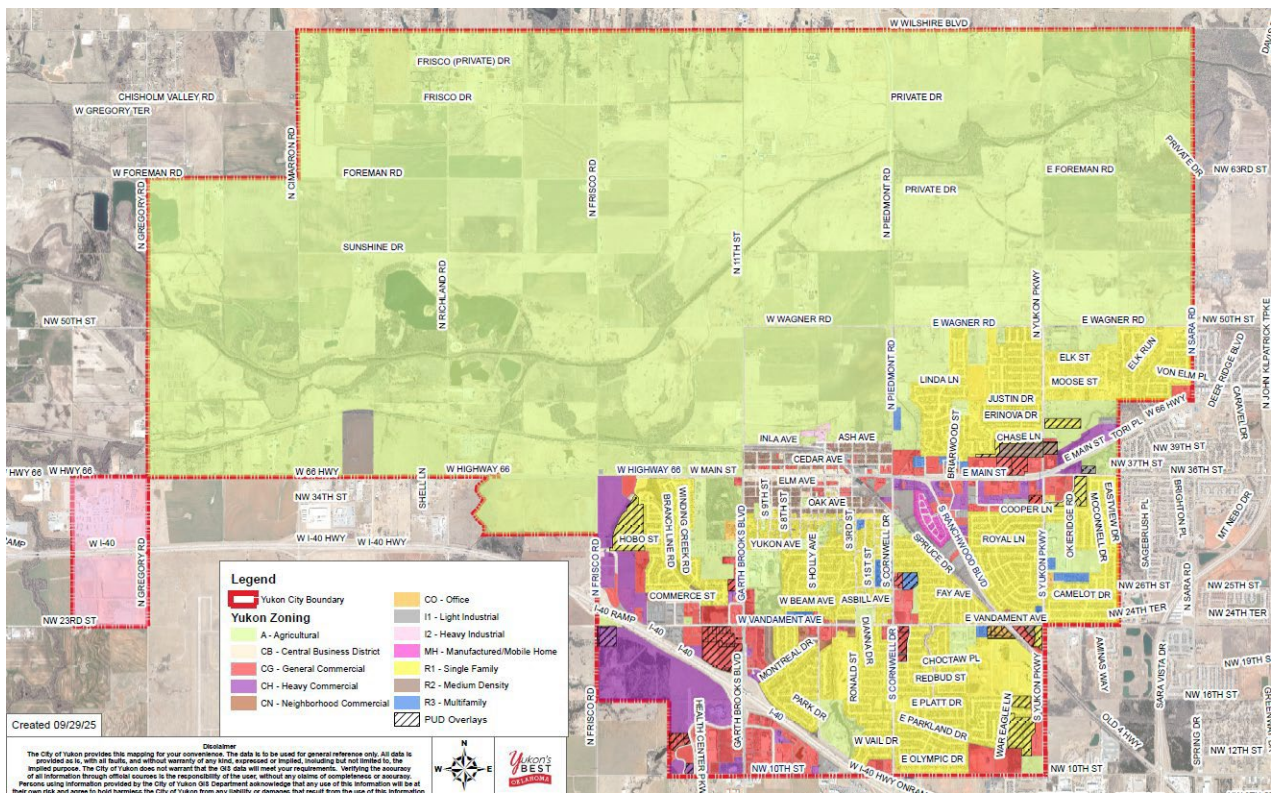
**Budget Estimate:**

Stormwater Fees	Avg Rate	Frequency	Avg #	Est. Total Per Year
Residential Customers	\$2.00 per unit	monthly	8500 units	\$204,000.00
Commercial Customers	Range \$2.96 to \$14.19	monthly	misc	\$ 57,711.47
<b>Average Stormwater Department Operational Budget</b>				\$264,000.00

Stormwater fees are used to pay for costs related to managing the Stormwater Program such as staffing, training, equipment, vehicles, mapping, outreach efforts and consultant services. Special projects can be funded if they help reach the goals of the 6 Minimum Control Measures.

# Target Audience

The Community's character is the basis for implementation priorities. Yukon is a small agricultural and residential municipality. Many residents commute outside of the City limits for work on a daily basis. Most of our residents are young families who are attracted to Yukon for our school system. A great deal of land in the 27 square mile City limits that is flood plain and is undevelopable. The concentration of the population is in an 8 square mile area situated between I-40 and old Route 66. Most of the large commercial development is near the I-40 corridor. Therefore, we have identified families with school-age children to be our main target audiences for outreach and participation.



# Municipal Facilities

The following facilities, owned by the City of Yukon, are subject to annual inspections:

	Facility	Address	Potential Pollutants or Chemicals Stored
1	City Hall	500 W. Main	n/a
2	Council Chambers	12 S. 5th Street	n/a
3	IT Dept	532 W. Main Street	n/a
4	Police Station	100 S. Ranchwood	n/a
5	Fire Station 2	302 W. 5th Street	Misc. chemicals
6	Fire Station 1	1000 E Main	Misc. chemicals
7	Public Works	1035 Industrial Drive	Salt, sand, misc. chemicals
8	Street Dept	501 Ash	Misc chemicals
9*	Sanitation	111 Ash	Floatables, misc waste
10	Recycle Center	111 Ash	Floatables, misc waste
11	Maintenance Garage	1035 Industrial Drive	Misc. chemicals
12	Vehicle Fueling	501 Ash	Misc. chemicals, fuel
13	Animal Control	701 Inla	Misc. chemicals
14	Water Line Maintenance	900 Industrial Drive	Water treatment chemicals
15	5 Water Towers	Various locations	n/a
16	15 Water Wells	Various locations	n/a
17*	Waste Water Treatment Plant	501 W. Wagner Rd	Misc. chemicals, sewage
18	9 Lift Stations	Various locations	sewage
19	Library/DR Community Cntr	1200 Lakeshore Drive	n/a
20	Jackie Cooper Gym	1024 E. Main Street	n/a
21	Parks Department	528 W. Main Street	Misc chemicals
22	City Park Community Center	2200 S. Holly	n/a
23	City Park Swimming Pool	2200 S. Holly	Pool chemicals
24	Kimbell Park Pool		Pool chemicals
25	12 City Parks	various	Fertilizers, weed killer, etc.
26	Misc. Park Concessions	various	Grease from fryers
27	8 Warning Sirens	various	n/a

\*Entities are also regulated by ODEQ.

# Contracted Services

We contract services with other entities such as Veolia who runs our water treatment and wastewater treatment plants and Oklahoma City Household Hazardous Waste Facility who takes chemicals for recycling if a Yukon water bill is presented. We also contract out engineering services and planning services with SRB.

# Ordinances

Yukon's stormwater ordinances can be found in **Chapter 207 – Floods** of the Code of Ordinances on Muni-code. Topics discussed in the ordinances include:

- Stormwater Program
- Fees
- Definitions
- Responsibility for Administration
- Construction Activities
- Illicit Discharges
- Penalties for Violations

Other ordinances that could be passed pertaining to stormwater pollutant reduction:

- landscape ordinance (to be modified)
- post-construction ordinance
- buffer ordinance

# Annual Report

Annual reports are due in October each year. Prior to 2015, each city chose deadline dates. After 2015, the program became more streamlined by the ODEQ. The reporting format is not yet stated. BMP tables are a good tool to use for the report. A summary explains why we do what we do and how we do it. The language provided below should be included in each annual report along with the tables that demonstrate our BMP implementation. A streamlined e-reporting template may be added by ODEQ that will replace the paper reports.

## **Categories reviewed are as follows:**

1. Activity – What was done?
2. Responsibility – Who is responsible for BMP?
3. Target Audience – Who is reached?
4. Frequency – How often?
5. Goal Achievement – Did you meet goal?
6. Metrics of BMP – How many? When? Numbers, weights, amounts, dates
7. Should you keep the BMP? Is there a better way to do this? - Analyze BMPs effectiveness each year and make changes as needed.

# Abbreviations

The following abbreviations are commonly used in association with stormwater regulations:

ABBREVIATION INDEX	
BMP	Best Management Practice
CSO	Combine Sewer Overflow
CWA	Clean Water Act
DEQ	Department of Environmental Quality
DO	Dissolved Oxygen
EPA	Environmental Protection Agency
GIS	Geographic Information System
GPS	Global Positioning System
LID	Low Impact Development
MCM	Minimum Control Measures
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NOV	Notice of Violation
NPDES	National Pollution Discharge Elimination System
NPS	Non-Point Source
OAC	Oklahoma Administrative Code
ODEQ	Oklahoma Department of Environmental Quality
OPDES	Oklahoma Pollution Discharge Elimination System
OWQS	Oklahoma Water Quality Standards
POTW	Publicly Owned Treatment Works
SMS4	Small Municipal Separate Storm Sewer System
SWMP	Stormwater Management Plan
SWMPPP	Stormwater Pollution Prevention Plan (aka SWP3)
SWPMP	Stormwater Pollution Management Plan
SWP3	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
WQS	Water Quality Standards



# Definitions

*All definitions contained in Section 502 of the Act and 40 CFR §122 shall apply to this permit and are incorporated herein by reference. For convenience, simplified explanations of some regulatory/statutory definitions have been provided, but in the event of a conflict, the definition found in the Statute or Regulation takes precedence.*

**Aquatic Resource of Concern (ARC)** is a waterbody corridor which contains habitat for federally listed (by the U.S. Fish and Wildlife Service) or state listed (by the Oklahoma Department of Wildlife Conservation) endangered or threatened aquatic species.

**Best Management Practice (BMP)** is the schedule of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the State. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

**Clean Water Act (CWA)**[33 U.S.C. 1251 et seq.] (formerly referred to as the Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972).

**Construction Site Operator** means, for the purpose of this permit and in the context of stormwater associated with construction activity, any party or parties associated with a construction project that meets either of the following criteria:1.The party must have operational control over construction plans and specifications, including the ability to make modifications to those plans and specifications (e.g., owner of the site).2.The party must have day-to-day operational control of those activities at a project that are necessary to ensure compliance with a Stormwater Pollution Prevention Plan (SWP3) for the site or other permit conditions (e.g., general contractor of the project).In addition, "owner" refers to the party that owns the structure being built. Ownership of the land where construction is occurring does not necessarily imply the property owner is an operator (e.g., a landowner whose property is being disturbed by construction of a gas pipeline or a landowner who allows a mining company to remove dirt, shale, clay, sand, gravel, etc. from a portion of his property). This definition is provided to inform permittees of DEQ's interpretation of how the regulatory definitions of "operator" and "facility or activity" are applied to discharges of stormwater associated with construction activity.

**Control Measure** refers to any Best Management Practice or other method used to prevent or reduce the discharge of pollutants to waters of the state.

**Director** means the Executive Director, chief administrator or an authorized representative of the Department of Environmental Quality in this plan. The term

director may be described differently in City ordinances referring to the Development Services Director.

**Discharge**, when used without a qualifier, refers to “discharge of a pollutant” as defined at 40 CFR §122.2.

**Illicit Connection** means any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

**Illicit Discharge** is defined at 40 CFR §122.26(b)(2) and refers to any discharge to a municipal separate storm sewer that is not entirely composed of stormwater, except discharges authorized under an OPDES or NPDES permit (other than the OPDES permit for discharges from the MS4) and discharges resulting from firefighting activities.

**Impaired Water** is a water which does not meet one or more of its beneficial uses due to not attaining applicable narrative or numeric water quality standards. Impaired waters are identified in the CWA section 303(d) listing from Appendix C of the most recent Integrated Report. Impaired waters include both waters with approved or established TMDLs, and those for which a TMDL has not yet been approved or established.

**Impervious Surface** means any hard surface area that prevents or retards the entry of water into the soil in a natural manner.

**Infall** is a place where stormwater from another MS4 enters our City limits.

**Large Common Plan of Development or Sale** means an area where multiple separate and distinct land disturbing activities may be taking place at different times, on different schedules, but under one proposed plan. This plan consists of many small construction projects that collectively add up to one or more acres of total disturbed land. For example, an original common plan of development of a residential subdivision might lay out the streets, house lots, and areas for parks, schools and commercial development that the developer plans to build or sell to others for development. All these areas would remain part of the common plan of development or sale until the intended construction is completed.

**Low Impact Development (LID)** is an approach to land development (or re-development) that works with nature to manage stormwater as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product.

**Maximum Extent Practicable (MEP)** is the technology-based discharge standard for Municipal Separate Storm Sewer Systems (MS4s) to reduce pollutants in stormwater discharges that was established by section 402(p) of the CWA, 33 U.S.C. § 1342.

**Municipal Separate Storm Sewer System (MS4)** is used to refer to either a Large, Medium, or Small Municipal Separate Storm Sewer System. The term is used to refer to either the system operated by a single entity or a group of systems within an area that are operated by multiple entities (e.g., the Oklahoma City MS4 includes MS4s operated by Oklahoma City, the Oklahoma Department of Transportation, and others). The term MS4 is defined at 40 CFR § 122.26(b)(8) and means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that is/are 1. owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States; 2. designed or used for collecting or conveying stormwater; 3. not a combined sewer; and 4. not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR § 403.3(q).

**Newly Regulated Small MS4** refers to a small MS4 newly designated as a result of US census data or other new information, and thus required to be covered under an OPDES permit.

**Notice of Intent (NOI)** is the mechanism used to “register” for coverage under a general permit.

**Non-traditional MS4** means state and federal prisons, office complexes, hospitals, state transportation agencies, universities, public housing authorities, schools and other special districts

**Notice of Termination (NOT)** is the mechanism used to terminate coverage under a general permit.

**Outfall** is a place where stormwater from our MS4 leaves the Yukon city limits (as defined by City of Yukon since there is no state or federal legal definition yet).

**Outstanding Resource Waters (ORW)** are designated as such in Oklahoma's Water Quality Standards under OAC 785:45-3-2(a).

**Pollutant of Concern (POC)** is a pollutant which causes or contributes to a violation of a water quality standard, including a pollutant which is identified as causing an impairment in the latest 303(d) list, a TMDL report, or watershed plan.

**Quality Assurance Project Plan (QAPP)** is a document that outlines the procedures that those who conduct a monitoring project will take to ensure that the data they collect and analyze meets project requirements.

**Recharge Area** is an area where stormwater drains into groundwater and resurfaces as a spring or flows to a well.

**Small MS4** is defined at 40 CFR § 122.26(b)(16) and refers to all separate storm sewers that are owned or operated by the United States, a state, city, town, county, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the state, but is not defined as a "large" or "medium" municipal separate storm sewer system. This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

**Small MS4 Newly Designated** after the Date of Permit Issuance refers to a small MS4 newly designated by EPA or DEQ after the date of this permit issuance.

**Stabilization** is the process of covering exposed ground surfaces with vegetative or non-vegetative practices that reduce erosion and prevent sediment discharge from occurring.

**Stormwater** is defined at 40 CFR § 122.26(b)(13) and means stormwater runoff, snow melt runoff, and surface runoff and drainage.

**Stormwater Management Program (SWMP)** refers to a comprehensive program to manage the quality of stormwater discharged from the municipal separate storm sewer system (MS4).

**Total Maximum Daily Load (TMDL)** refers to the sum of the individual wasteload allocations (WLAs) for point sources, safety, reserves, and loads from nonpoint sources and natural background.

**Urbanized Area (UA)** is defined by the U.S. Census Bureau. The Census Bureau's urban areas represent densely developed territory, and encompass residential, commercial, and other non-residential urban land uses. The Census Bureau delineates urban areas after each decennial census by applying specified criteria to decennial census and other data. The Census Bureau identifies an urbanized area as an area with 50,000 or more people.

**“You” or “Your,”** as used in this permit, is intended to refer to the permittee, operator or discharger, as the context indicates, and that party's responsibilities (ie: the city, the county, the flood control district, the U.S. Air Force, etc.)

**Waters of the State** means all streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, irrigation systems, drainage systems, storm sewers and all other bodies or accumulations of water, surface and underground, natural or artificial, public or private, which are contained within, flow through, or border upon this state or any portion thereof, and shall include under all circumstances the waters of the United States which are contained within the boundaries of, flow through, or border upon this state or any portion thereof. Provided waste treatment systems, including treatment ponds or lagoons designed to meet federal and state requirement other than cooling ponds as defined in the CWA or rules promulgated thereto, and prior converted cropland are not waters of the state [27A O.S. § 1-1-201 (20)].

**Watershed** is an area of land that drains to a specific river or lake.

**Wasteload Allocation (WLA)** is the fraction of the total pollutant load apportioned to all point sources, and includes stormwater discharges regulated as point sources which are identified in the TMDL as WLA\_MS4.



# Contact Information

**City of Yukon, Stormwater Department**

Cailyn Prather, Stormwater Program Manager

334 Elm Ave, Yukon, OK 73085

[www.yukonok.gov](http://www.yukonok.gov) (405) 354-6676

**City of OKC HHW Facility**

1621 S Portland Ave, OKC, OK 73108

405-682-7038

[www.okc.gov](http://www.okc.gov)

**COSWA – Central Oklahoma Stormwater Alliance** [coswa.wordpress.com](http://coswa.wordpress.com)

**EPA - Environmental Protection Agency,** [www.epa.gov](http://www.epa.gov)

**OCC – Oklahoma Conservation Commission** (see also Blue Thumb)

[www.conservation.ok.gov](http://www.conservation.ok.gov)

**DEQ – Department of Environmental Quality**

Water Quality Division

707 N. Robinson, PO Box 1677, Oklahoma City, OK 73101-1677

[www.odeq.ok.us](http://www.odeq.ok.us) (405) 702-8139

**OWRB – Oklahoma Water Resources Board**

3800 N. Classen Boulevard, Oklahoma City, OK 73118

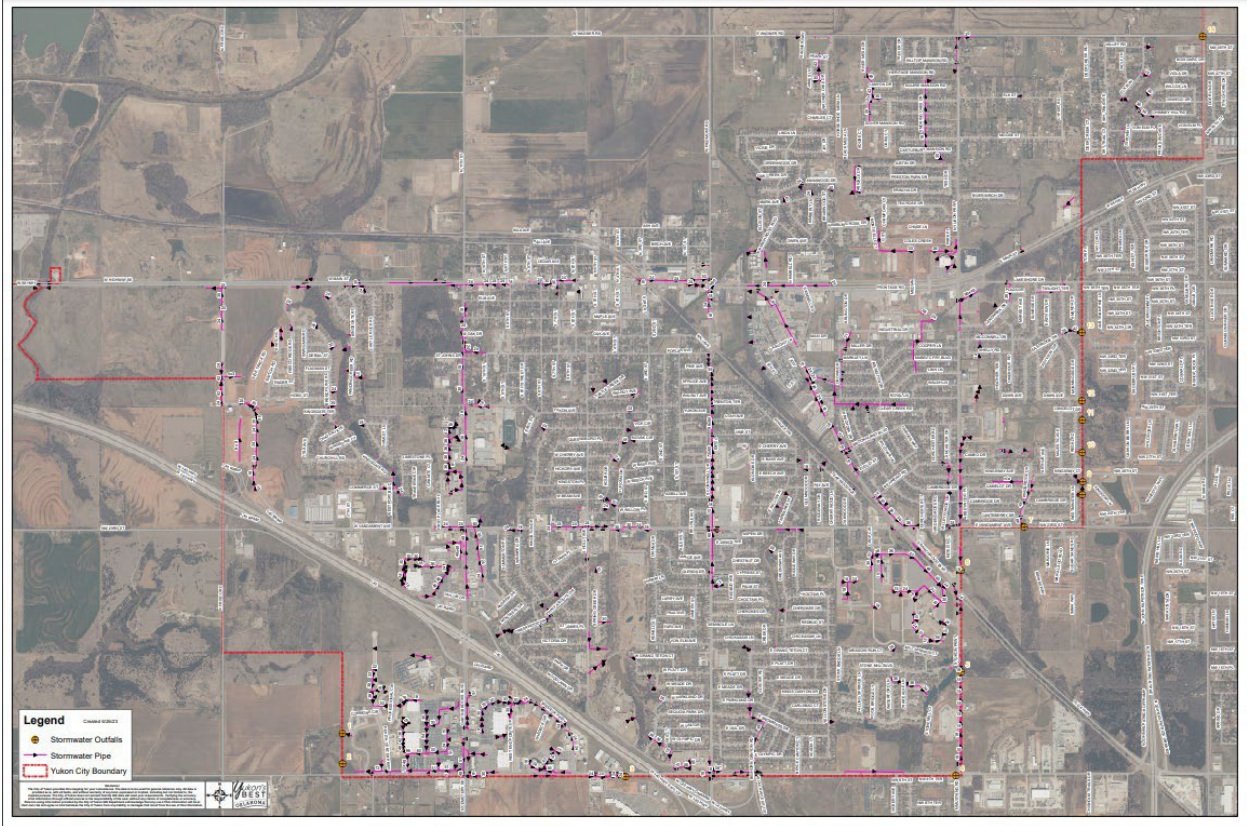
[www.owrb.ok.gov](http://www.owrb.ok.gov) (405) 530-8800

# Maps

(these maps are available on our GIS system)

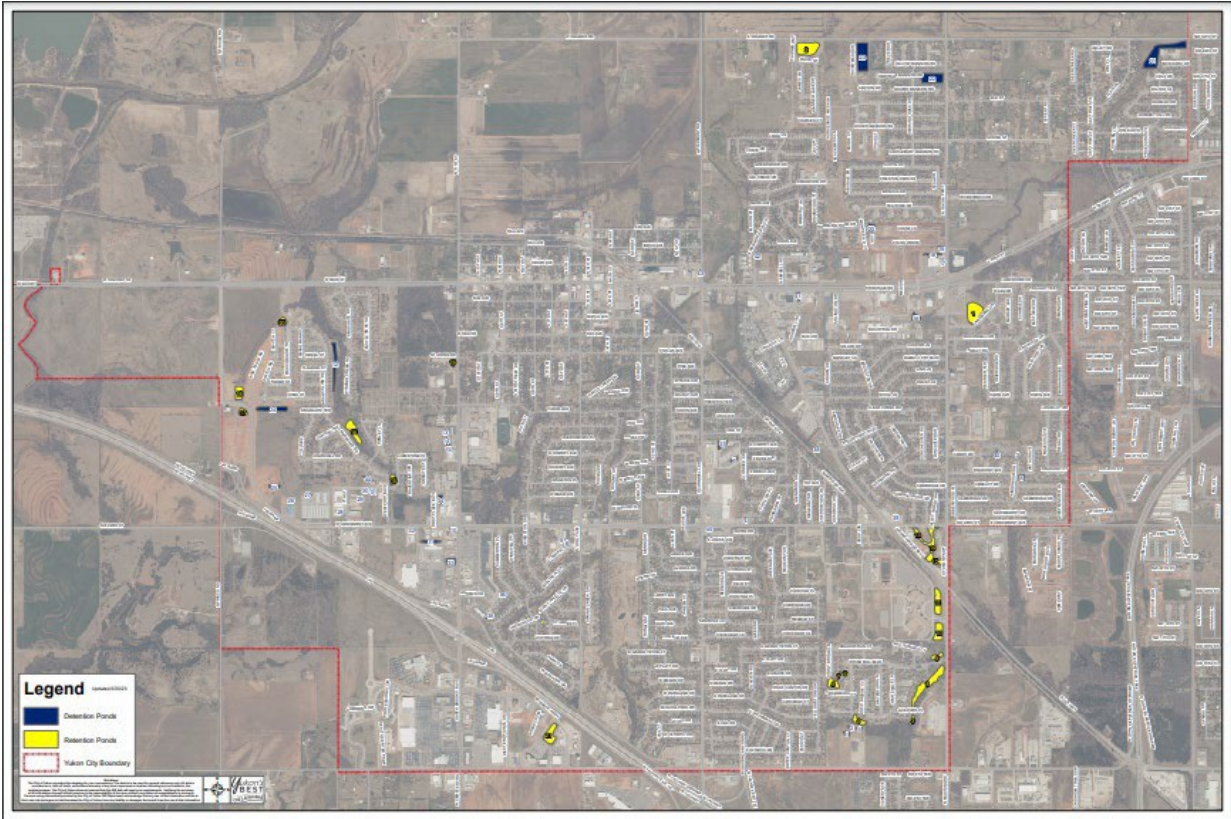
1. Storm Sewer Inlet System Map (hardcopy paper map kept at City offices)
2. Stormwater Outfall Map (includes Storm Sewer Inlets)
3. Detention/Retention Ponds Map
4. Septic System Map
5. Floodplain Map
6. Zoning/Land Use Map
7. Drainage Basins Map

# Stormwater Outfall Map





# Detention/Retention Ponds Map



# Forms

(These are forms we use for record keeping)

1. BMP Table sheets for Annual Report
2. Land Disturbing Permit
3. Construction Inspection Form
4. Dry Weather Field Screening Reporting Form

# Reports

- Monthly Report to Assistant City Mgr (activities, street sweeping miles, etc)
- Annual Report to ODEQ created every fiscal year in July.

# Outreach Materials



Brochure Racks are available at the Mabel Fry Library and the Yukon Community Center, (See brochures binder for hard copies of brochures & flyers.)

1. Brochure & Flyer Inventory List
2. Residents Guide
3. Lawn Maintenance
4. OKC-HHW
5. Coloring books
6. Sample Eco-Tips PSA Graphics
7. Commercial Business BMP Flyer
8. Swimming Pool Flyer
9. Septic Tank Flyer
10. Construction & Erosion

CITY COUNCIL ADOPTION OF STORMWATER MANAGEMENT PLAN

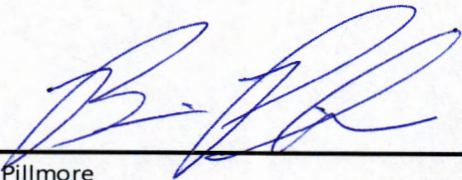
Name of MS4 Permittee: City of Yukon, OK

OKR04 Permit Number: OKR040022

The following certification statement is required by Part VII.H.4. of the OKR04 Permit. Signatory requirements are specified in Part VII.H.2. of the OKR04 Permit. For Permittee, the certification must be signed by either a principal executive officer, a ranking elected official, or a duly authorized representative. Refer to Part VII.H. of the OKR04 Permit for all signatory and certification requirements.

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

X



Brian Pillmore  
City of Yukon Mayor

12/14/2025

Date

# APPENDIX A. Brochure & Flyer Table

2020-2025 Public Outreach Flyer & Brochure Inventory										
	Brochures	Topic	Library (# & dates)		Dev Serv		Com Center		In stock	Status
1	HHW OKC Facility	HHW	25		25		50		225	Currently used (get from HHW)
			25				25			
2	Residents Guide	General SW	25		25		50		Print as needed	New version created 4/1/19
			25		25		25			
3	Lawn Maintenance	Grass/leaves	10		10		10		Print as needed	
			10		10		10			
4	Rain Barrel Mntc	same							Print as needed	Give to rain barrel buyers
5	Septic Tank Mntc	same	10		10		10		Print as needed	Using in-house flyer
	Flyers	Topic	Audience				#	Dates	How Distributed	
1	BMPs for Yukon Businesses	BMPS for Coml Bus	Coml Businesses				135+	April each yr	Business License Renewals	
2	Swimming Pool Water	Draining pools	Residents with pools				93+	May/Aug	w/Pool permits & PSAs	
3	BMPs for Septic Owners	Septic mntc	Residents with septic tanks				209	Sept each yr	Targeted mail-out	
4	Rain Barrel Sale	Event flyer & cards w dates	Residents with water accts & library & Community Center				8500	Jan each yr	Print as needed	
5	Classes & Workshop	Event flyers	Public				30	intermittent	Print as needed – display racks	
	Outreach Type	Topic	Audience				#	Dates	Status	
1	City Website	SW Page	Yukon Residents				1	April 2019 - ongoing	Online (current info 2019-2020)	
2	PSA's on facebook page (graphics)	Misc.	Residents on City FB Page				3-5	Seasonal	(ongoing ) Eco Tips Graphics for Spring, Summer and Fall	
3	Coloring Book Every Drop Counts	water	children				10	Events	Printed in-house	
							50	Fish out (Mar)		
4	Coloring Book Don't be a litter bug	litter	children				10	events	Trying to locate source to have more printed	
5	Door-hanger for SW Violations	violations	Residents who have blown grass and leaves in street				30	ongoing	Leave for residents with complaints on them	

# APPENDIX B. BMP Tables

# 2021-2026 BEST MANAGEMENT PRACTICES STATUS TABLE FOR CITY OF YUKON

\*= Required Activity, E = event, F = Frequency: (A=Annually, B=Biannually Q=Quarterly, M=Monthly, O=On-going, 1=One-time action or event, 5=once per 5 yr permit cycle)

	BMP listed (Minimum Metric: Amount, Frequency)	Dept	Reporting Metric	Target	F	Changes to BMPs
	<b>PUBLIC EDUCATION &amp; PARTICIPATION (MCM 1)</b> (4 required events)					
1*	BMP: Distribute brochures to residents: Stock 2 brochure racks in Jan & July.	SW	10 library rack 10 Community Center rack	All years	B	Changed wording
	<b>Rationale:</b> Since we are a small town turned suburb, most of our residents live in single family housing in neighborhoods with a home-ownership rate of 74.3%. Our best places for outreach with brochure racks are the Library, the Community Center and Development Services.					
	<b>Measurable Goal:</b> Stock 2 brochure rack locations with “Resident’s Guide to Stormwater” brochure twice a year with a minimum of 10 each.					
	<b>BMP Assessment:</b> Keep BMP for those who do not have computers, cell phones or access to social media.					
2*	BMP: Distribute brochure to encourage citizens to use proper chemical disposal methods.	SW	10 library rack 10 Community Center rack	All years	B	Changed wording
	<b>Rationale:</b> OKC has a HHW facility in a central location just about 20 minutes from Yukon and we have a contract for services with them. Our best places for outreach are the Library, Community Center. We will use OKC’s HHW brochure in our brochure racks.					
	<b>Measurable Goal:</b> Stock 2 brochure rack locations with “OKC’s HHW Facility” brochure twice a year with a minimum of 10 each.					
	<b>BMP Assessment:</b> Keep BMP for those who do not have computers, cell phones or access to social media.					
3	BMP: Promote use of recycling center.	Sanitation	Sent out flyers in utility bill to 8500 households.	All years	A	Changed to flyers
	<b>Rationale:</b> Since we do a recycling event at least once annually, we use this event as a chance to promote the recycling center that is open Mondays through Saturdays. This event is advertised as a flyer insert in monthly utility bill to about 8500 households.					
	<b>Measurable Goal:</b> Provide a minimum of 75 flyers to residents to promote recycling event as well as promoting info about our services.					
	<b>BMP Assessment:</b> Continue event and outreach to give people opportunities to recycle items and a reminder to recycle.					
4	BMP: Utilize Social Media for seasonal PSAs (4 posts per year)	SW	Facebook = 27,083 Followers Twitter= 2,796 Followers Instagram= 3,592 Followers	All years	Q	Changed to social media from flyers
	<b>Rationale:</b> Social media has become a more effective way to reach people than brochures so we are doing seasonal messages.					

	<b>Measurable Goal:</b> We will post public service announcements a minimum of 4 times a year on at least one social media network.					
	<b>BMP Assessment:</b> Continue with social media outreach since numbers are close to our population.					
5	<b>BMP: Local Cable Access TV channel Run Seasonal PSAs on urban stormwater protection.</b>	SW IT MKT	Seasonal PSAs: Cox Channel 20 =apx 20,000 customers	All years	Q	Changed from video
	<b>Rationale:</b> Our cable access channel is utilized to run seasonal PSA graphics instead of showing videos like After the Storm which is dated.					
	<b>Measurable Goal:</b> Post 4 PSAs per year					
	<b>BMP Assessment:</b> Continue with BMP as long as we utilize a public access cable channel.					
6	<b>BMP: Participate in Radio and/or TV ad with COSWA.</b>	SW	Tyler Media = 4 radio stations	When possible	A	
	<b>Rationale:</b> We are able to reach more people in the region by pooling our money together through COSWA and doing an outreach campaign with several cities pitching it also shows a unified approach from the municipalities with MS4s.					
	<b>Measurable Goal:</b> We will co-sponsor one radio or television ad campaign per permit cycle similar to the “Everyday Environmentalist” radio campaign that was cost shared with other COSWA cities.					
	<b>BMP Assessment:</b> Radio reaches a large regional audience that we cannot reach on our own and should continue to be utilized as BMP.					
7	<b>BMP: Maintain SW webpage</b>	SW MKT	Updated 12/28/2021	All years	A	
	<b>Rationale:</b> As new best management practices are implemented the information changes and the website needs to reflect the changes. It is also a good place to show progress, participation, events and get input from citizens.					
	<b>Measurable Goal:</b> We will review our website content once every calendar year and make appropriate changes.					
	<b>BMP Assessment:</b> Keeping the website current is important because the public goes there to get information. BMP should be continued.					
8	<b>BMP: Hold Earth Day event.</b>	SW	1 event per year	All years	A	New BMP
	<b>Rationale:</b> Earth Day is a good time to discuss and promote water quality and conservation.					
E1	<b>Measurable Goal:</b> Hold 1 Earth Day event per year.					
	<b>BMP Assessment:</b> Earth Day subject matter is a good time to talk about water quality.					
9	<b>BMP: Hold drawings with educational entry forms at events and / or appropriate venues.</b>	SW	Average 300 children attending events.	All years	A	
	<b>Rationale:</b> We are able to educate people by enticing them to win a prize. They must read the information and answer questions about what they read on the entry form before they can submit their entry. Prizes are a good way to attract people to our stormwater booth.					
E2	<b>Measurable Goal:</b> We will host a minimum of 1 drawing per year to encourage SW education via entry form content.					
	<b>BMP Assessment:</b> Keep BMP and utilize in different ways as appropriate each year.					
10*	<b>BMP: Present Stormwater Education Program for</b>	SW	Average 300 children visiting	All years	A	

	children.		Stormwater Booth at events				
	<b>Rationale:</b> We have a couple of well attended events offered in conjunction with our Parks Department that are geared towards school age children that are great opportunities to provide water quality education by utilizing the Enviroscape model. We also take advantage of opportunities to be a guest speaker in the classroom.						
E3	<b>Measurable Goal:</b> We will provide a stormwater education opportunity (generally a booth) at 1 child-friendly event per year.						
	<b>BMP Assessment:</b> This was a good opportunity to reach high school age children.						
11 *	<b>BMP: Make SWMP available to public.</b>	SW IT	Report dates of changes	All years	O		
	<b>Rationale:</b> This gives people a chance to become aware of the program and to offer input or support.						
	<b>Measurable Goal:</b> Post information on website once per permit cycle.						
Met	<b>BMP Assessment:</b> Continue to update and post relevant documents and changes to program.						
12*	<b>BMP: Take advice from citizens via input on website.</b>	IT	Report # of comments received. Track annually.	All years	A		
	<b>Rationale:</b> This gives people a chance to become aware of the program and to offer input or support.						
	<b>Measurable Goal:</b> Review comments yearly when analyzing BMPS for annual report.						
	<b>BMP Assessment:</b> Continue to review comments.						
13*	<b>BMP: Discuss Phase II at public meetings</b>	DS	Report date of public meeting	All years	A		
	<b>Rationale:</b> This gives people a chance to become aware of the program and to offer input or support.						
	<b>Measurable Goal:</b> Phase II Program will be discussed at least once per year at a public meeting.						
	<b>BMP Assessment:</b> Continue to discuss at public meeting since this is a required BMP.						
14	<b>BMP: Conduct storm drain marking</b>	SW	Organize with Scouts or similar groups, report number marked	2022	5		
	<b>Rationale:</b> These activities give people a chance for hands on participation.						
	<b>Measurable Goal:</b> One project will be encouraged and supported each permit cycle.						
	<b>BMP Assessment:</b> Keep BMP and facilitate when groups are available to mark or replace old curb markings.						
15	<b>BMP: Support Stormwater Education Outreach at regional venue. (We usually co-sponsor the COSWA Booth at the OKC Home &amp; Garden Show)</b>	SW	# Presentation Attendees # Surveys Taken # Rain Barrel Cards	All years	A		Add as new BMP
	<b>Rationale:</b> We are able to reach more people in the region through COSWA with several cities pitching it also shows a unified approach from the municipalities with MS4s. The OKC Home Show is well attended and our booth gives us an opportunity to talk to people about water.						
	<b>Measurable Goal:</b> 1 Stormwater Education Outreach Booth co-sponsored annually. Report dates & number of attendees reached.						
	<b>BMP Assessment:</b> Keep BMP.						



	<b>INDUSTRIAL FACILITIES (MCM 2 ) Not Applicable to City of Yukon</b>						
	<b>ILLICIT DISCHARGE, DETECTION &amp; ELIMINATION (MCM 3)</b>						
1*	Receive pollution and spill episode information from the public.	SW IT	Report # of contacts made from public via email or phone	All years	O		
	<b>Rationale:</b> Helps us know when there is an issue.						
	<b>Measurable Goal:</b> 1 website or phone line available per year. (Report # of calls received and/or emails received annually.)						
	<b>BMP Assessment:</b> Required BMP. Continue to track through monthly reports.						
2*	BMP: Implement a source tracking inspection and enforcement program.	SW DS	# of point sources tracked & discharges remediated	All years	O		
	<b>Rationale:</b> Helps us locate and mitigate point sources.						
	<b>Measurable Goal:</b> 1 report for each month of the fiscal year. (Report number of point sources tracked for each month.)						
	<b>BMP Assessment:</b> Required BMP. Continue to track.						
3*	BMP: Distribute flyers about best management practices to commercial businesses.	SW MKT	Report # flyers sent w/bus lic renewal in April	All years	A		
	<b>Rationale:</b> Directly reaches commercial properties to prevent issues.						
	<b>Measurable Goal:</b> Send SW BMPs for Businesses flyer to all business license renewal customers (averaging over 100 customers annually).						
	<b>BMP Assessment:</b> Required BMP. Continue distribution with business licenses. It may change to email instead of mail next year.						
4	BMP: Provide outreach to prevent swimming pools from being drained into our MS4.	SW	Report # mailed out to pool permittees or media post date	All years	A		Added as new bmp
	<b>Rationale:</b> Helps keep people from draining pools into the street.						
	<b>Measurable Goal:</b> Send out targeted mailing to all pool owners with pool permits or one social media post per year. (avg 90)						
	<b>BMP Assessment:</b> Social media seems to be the most effective method for outreach since only in ground pools get a permit and normally are plumbed to the sanitary sewer. The above-ground temporary pools are the main culprits.						
5	BMP: Implement a floatable trash & debris removal program for local streams and MS4.	SW	Report # of participants, # of bags, # of events	2021-2025	A		
	<b>Rationale:</b> Helps reduce floatable pollution and raises public awareness.						
E4	<b>Measurable Goal:</b> Organize 1 public clean-up event per year or hire labor to clean roadways and report number of days cleaned.						
	<b>BMP Assessment:</b> Continue whenever possible to partner on clean up events. Met our 4 public outreach events quota.						
6*	BMP: Implement Dry Weather Field Screening inspection program.	SW GIS	Report # sites inspected each year.	2021	A		

	<b>Rationale:</b> This activity helps us understand our MS4.						
	<b>Measurable Goal:</b> Inspect 40% of sites each year Aug-Nov during dry weather when we have not had rain for over 10 days.						
	<b>BMP Assessment:</b> Required BMP. Continue inspecting at least 40% of sites each year.						
7	BMP: Provide Household Hazardous Waste Program	SW	MOU signed annually with OKC in July. Report # of users.	All years	O		
	<b>Rationale:</b> Gives the public the opportunity to properly dispose of household hazardous waste.						
	<b>Measurable Goal:</b> 1 MOU signed with an appropriate Household Hazardous Waste facility per year & 1 user per month.						
	<b>BMP Assessment:</b> Keep BMP as long as public supports activity.						
8	Update MS4 system map showing outfalls, waters of the state and MS4 structures (1 update per year)	SW GIS	Map reviewed or updated annually; report changes		A		Replace
	<b>Rationale:</b> Keeps our information current.						
	<b>Measurable Goal:</b> 1 map update per year.						
	<b>BMP Assessment:</b> Replace BMP since the reporting metrics will not change significantly from year to year unless we annex new land or add new outfalls.						
9	Offer free dump days to the public at Sanitation.	San	Report # of free dump days (one per month is the norm)	All years	M		Added as new bmp
	<b>Rationale:</b> This helps prevent dumping in ravines and creeks when the cost of dumping is an issue for people who are struggling financially.						
	<b>Measurable Goal:</b> Offer at least one free dump day per year.						
	<b>BMP Assessment:</b> Keep BMP as long as Sanitation can offer free dump days.						
10 *	Implement a comprehensive bacteria 303 d pollutant reduction plan as defined in OKR04 with priority areas	SW	Report dates of modified program	All years	1		
	<b>Rationale:</b> Updates help keep plan relevant. <b>See Below:</b>						
	<b>Measurable Goal:</b> Report outcomes of Bacteria reduction plan once per year in Annual Report.						
	<b>BMP Assessment:</b> Keep BMP so changes can be tracked and formally addressed.						
<b>303 D Pollutant Reduction Plan Action Items</b>							
a	Identify significant non-stormwater discharges of 303d pollutants.	SW	List created 9 significant pollutants identified 10/2019. Report date of plan update.				
	<b>Measurable Goal:</b> 1 list created						
	<b>BMP Assessment:</b> Keep BMP in case changes are made to the 303d list.						
b *	Conduct pollutant source inspections in 303d high priority areas.	Sanitation SW	Sanitation inspects 27 known trouble sites monthly				
	<b>Measurable Goal:</b> 1 annual report on activities						

	<b>BMP Assessment:</b> Keep BMP since required.						
c *	Create map for above priority areas.	GIS	Report modifications to map per year				
	<b>Measurable Goal:</b> 1 map created 2021						
	<b>BMP Assessment:</b> Keep BMP since required.						
d	Control Pollution from sanitary sewer overflows and bypasses. (report pipe bursting, raising manholes, etc.)	SW PW	Report amount in linear ft of pipe bursting and amount of man-holes raised and repairs made.				Might need funding
	<b>Measurable Goal:</b> 1 annual reports of activities						
	<b>BMP Assessment:</b> Keep BMP.						
e *	Address pollution from on-site sewage systems	GIS SW	Report # of targeted mailings to mapped septic owners.				
	<b>Measurable Goal:</b> Send out targeted mailing to all mapped septic owners or provide (minimum of 20 flyers)						
	<b>BMP Assessment:</b> Keep. Continue to remind septic owners to check their septic systems.						
f	Inspect Grease Traps Annually	DS	X amount of grease traps inspected at restaurants per yr				
	<b>Measurable Goal:</b> Inspect a minimum of 10 grease traps per year.						
	<b>BMP Assessment:</b> Continue BMP. Hopefully we will have enough staff next year.						
<b>CONSTRUCTION SITE STORMWATER RUNOFF CONTROL (MCM 4)</b>							
1	<b>BMP: Distribute BMP brochure on how to improve process to contractors. (10 brochures)</b>	SW DS	Report # of brochures distributed	Once per permit cycle	O		Add as new BMP
	<b>Rationale:</b> Lets development community know what our expectations are.						
	<b>Measurable Goal:</b> Distribute 10 brochures to contractors.						
	<b>BMP Assessment:</b> Keep BMP. Continue to mail out brochures with license renewals.						
2 *	<b>BMP: Develop procedures for site plan review (All site plans over an acre reviewed)</b>	SW DS	Report number of site plans reviewed each yr	All years	M		
	<b>Rationale:</b> Site plan review tells inspector what to look for and ask for ahead of time.						
	<b>Measurable Goal:</b> Review and report all site plans for sites over an acre.						
	<b>BMP Assessment:</b> Required BMP. Keep.						
3*	<b>BMP: Annual staff training for construction inspectors</b>	SW DS	Report dates and numbers trained	All years	A		
	<b>Rationale:</b> Inspectors need to know what to look for in Erosion Control.						
	<b>Measurable Goal:</b> One inspector training attended by Development Services staff per year.						

	<b>BMP Assessment:</b> Required BMP. Keep.						
4*	<b>BMP: Provide or facilitate or sponsor annual training for development &amp; construction community.</b>	SW DS	# of construction industry providers trained	2023	A		Add as new BMP
	<b>Rationale:</b> Helps keep local development community up to date on SW issues.						
	<b>Measurable Goal:</b> (1 per year)						
	<b>BMP Assessment:</b> This BMP is difficult to implement on my own. The larger MS4s have more staff and resources to put on education events. I feel like this might be more appropriate for the category 3's or as part of a COSWA effort. I created a brochure for Construction BMPs that I sent out to all of our contractors with license renewals and I can send out invites for training events as well.						
5*	<b>BMP: Conduct Construction Site Inspections</b>	SW DS	Report # inspections annually	All years	M		
	<b>Rationale:</b> Site inspections help with compliance.						
	<b>Measurable Goal:</b> 1 per month avg per active site						
	<b>BMP Assessment:</b> Required BMP. Continue inspections.						
6*	<b>BMP: Develop or update requirements for construction site operators to implement sediment and erosion BMPs.</b>	SW DS	Report date ordinance reviewed	2024	1		
	<b>Rationale:</b> Updates help keep things current.						
	<b>Measurable Goal:</b> 1 ordinance update per permit cycle						
	<b>BMP Assessment:</b> Required BMP. Since OKR10 is being updated, it will be a good time to review and update our ordinance. We will also be finished with our Development Code Update that has taken up a lot of staff time over the past year.						
7*	<b>BMP: Develop requirements for construction site operators to control wastes at sites.</b>	SW DS	Report date inspection check sheet updated	2024	1		
	<b>Rationale:</b> Waste from construction sites can end up being washed into storm drains if not picked up or managed properly.						
	<b>Measurable Goal:</b> 1 code update per permit cycle						
	<b>BMP Assessment:</b> Required BMP. We will work on our ordinance updates this permit cycle.						
8	<b>BMP: Send site inspection sheets to Responsible Party/Permit Holders with photos of issues</b>	SW	Report number of inspections results shared.	All years	M		
	<b>Rationale:</b> If they can see the issues, they are more likely to understand and correct issues.						
	<b>Measurable Goal:</b> 1 per year						
	<b>BMP Assessment:</b> Keep BMP.						
9	<b>BMP: Request OKR10 list from ODEQ</b>	SW	Annually	All years	A		New BMP
	<b>Rationale:</b> If we know what has an open OKR10 permit, we know what to be inspecting in case they don't get Land Disturbing permits.						

	<b>Measurable Goal:</b> 1 per year						
	<b>BMP Assessment:</b> Keep BMP. This helps us understand what sites have an open permit that we might need to keep an eye on.						
	<b>POST CONSTRUCTION MANAGEMENT (MCM 5)</b>						
1	<b>BMP: Site plan review for LID &amp; Trees (Created check sheet.)</b>	SW	Report number of trees added, # of LID facilities, & # of plans reviewed per year )	All years	M		
	<b>Rationale:</b> Helps us keep tracks of tree canopy and LID.						
	<b>Measurable Goal:</b> Review all site plans over 1 acre in size and report LID and # of trees planned.						
	<b>BMP Assessment:</b> Keep BMP. It helps us track new trees added to cityscape.						
2	<b>BMP: Map areas with detention ponds</b>	SW GIS		2023	1, 0		
	<b>Rationale:</b> Helps us know what needs to be inspected and who is responsible party to contact.						
	<b>Measurable Goal:</b> 1 map to be created and updated annually.						
	<b>BMP Assessment:</b> Keep BMP but after finishing map, modify BMP to say update map annually.						
3 *	<b>BMP: Review local codes &amp; identify barriers to LID</b>	SW DS	Review & identify	2022	1		
	<b>Rationale:</b> Review codes so that we can modify.						
	<b>Measurable Goal:</b> 1 code reviewed and barriers to LID identified.						
	<b>BMP Assessment:</b> We are continuing with the update our development code this year and have looked at barriers.						
4 *	<b>BMP: Remove barriers to LID and justify those not removed</b>	SW DS	Remove/justify	2023	1		
	<b>Rationale:</b> Removing barriers reduces uncertainty and helps projects materialize and move forward.						
	<b>Measurable Goal:</b> 1 justification letter of barriers not removed.						
	<b>BMP Assessment:</b> Required BMP. Keep until met.						
5	<b>BMP: Identify opportunities for LID in current code. Review code and create list of opportunities for LID.</b>	SW	1 list of opportunities created	2022	5		New BMP
	<b>Rationale:</b> Gives us current information to review assessment capabilities.						
	<b>Measurable Goal:</b> 1 list of opportunities for LID created.						
	<b>BMP Assessment:</b> Replace BMP when met.						
6*	<b>BMP: Develop procedures for inspection of detention ponds.</b>	SW	Report number of ponds inspected	2023	1		
	<b>Rationale:</b> Helps us keep ponds cleaned out.						

	<b>Measurable Goal:</b> Procedures in the form of a check sheet for inspection of detention ponds created.						
	<b>BMP Assessment:</b> Keep until requirement met and then change BMP to inspect detention ponds and report number inspected.						
7 *	<b>Participate in a Public Ed Program for developers that includes LID strategies. (1 per permit cycle)</b>	SW DS	Report # attended at program	2023	1		
	<b>Rationale:</b> Education of development community could result in changes to the built environment.						
	<b>Measurable Goal:</b> Host one public ed program for developers including LID strategies per permit cycle.						
	<b>BMP Assessment:</b> This needs to be a COSWA project that membership supports. I don't know that I can implement this on my own.						
8 *	<b>BMP: Develop procedures for inspection and maintenance of catch basins, streets, parking lots, LID facilities etc.</b>	PW		2024	1		
	<b>Rationale:</b> Helps inspectors and other staff know what to look for and how to report issues.						
	<b>Measurable Goal:</b> Respond to 100% of reported issues by notifying Public Works crews who perform visual inspections after being notified.						
	<b>BMP Assessment:</b> Keep BMP. Inspections are performed by our line crews in Public Works who are responsible for cleaning out our drainage system. We have limited ability to dictate their methods for performing inspections since they are not in our department.						
9	<b>BMP: Increase Tree Canopy in City Limits (report numbers of trees added each year - 1 tree required per new house, parking lots trees and park projects)</b>	SW DS	Report number of trees added to city scape	All years	0		
	<b>Rationale:</b> Trees help mitigate stormwater pollution by drinking water with their leaves and routing it into the ground. Trees also stabilize streambanks and help to cool urban environments which in turn keeps waterways from having low DO. Parking lot trees also increase pervious areas in parking lots which can alleviate run off by slowing water down and giving it someplace else to go besides the storm drain.						
	<b>Measurable Goal:</b> 10 trees will be added to City Scape per year.						
	<b>BMP Assessment:</b> Keep BMP to track trees planted each year.						
10	<b>BMP: Do final inspections to ensure that all trash picked up and ground covered. (1 per year)</b>	DS	Report # of final inspection per year.	2	0		
	<b>Rationale:</b> Determines that site was stabilized prior to the issuance of the Certificate of Occupancy.						

	<b>Measurable Goal:</b> 1 final inspection will be made for each finished residential home built and commercial buildings before occupation.						
	<b>BMP Assessment:</b> Keep BMP. It shows that we do require the site to be stabilized before allowing residents to move in and we can quantify how many we inspect. We do it on commercial as well.						
<b>MUNICIPAL GOOD HOUSEKEEPING (MCM 6)</b>							
1*	<b>BMP: Comply with all state and local public notification requirements.</b>	All	Every public meeting posted	All years	0		
<b>Rationale:</b> Cities should comply with notification requirements as a best practice.							
<b>Measurable Goal:</b> All state and local public notification requirements will be met for all public meetings.							
<b>BMP Assessment:</b> Required so keep.							
2	<b>BMP: Review and update SW Ordinances as needed (review once per permit cycle)</b>	SW		2024	5		
<b>Rationale:</b> Ordinances should be reviewed each permit cycle so that they remain current.							
<b>Measurable Goal:</b> One ordinance review per permit cycle.							
<b>BMP Assessment:</b> Keep BMP since things change over time and the ordinances should be reviewed every permit cycle.							
3	<b>BMP: Review &amp; evaluate all BMPs (annually at report time)</b>	SW PW	Report changes to BMPs with annual reports each year	2021	1		New BMP
<b>Rationale:</b> Keeps BMPs relevant to time period, staff & equipment							
<b>Measurable Goal:</b> 1 BMP review & evaluation conducted.							
<b>BMP Assessment:</b> Keep BMP since it reminds me to report the activity and get credit for it.							
4 *	<b>BMP: Train city field workers to identify and report pollution</b>	SW PW		All years	A		
<b>Rationale:</b> City field workers see things on a daily basis and should be trained to know what is an issue to report and best practices.							
<b>Measurable Goal:</b> Provide 1 annual training of City workers for stormwater pollution prevention.							
<b>BMP Assessment:</b> Required BMP. Keep.							
5	<b>BMP: Use coconut fiber filter mats on City facilities to mitigate storm drain pollution.</b>	SW PW		All years	A		
<b>Rationale:</b> City utilities should have best practices to protect drains at facilities.							
<b>Measurable Goal:</b> Check mats quarterly and replace as needed throughout the year.							
<b>BMP Assessment:</b> Keep. This is a BMP that is easy to implement to help keep oil and other pollutants from entering drains at our facilities.							
6	<b>BMP: Street Sweeping (minimum = 12 months of info)</b>	SW PW	Report #of miles and amount of spoils picked up per year	All years	M		

	<b>Rationale:</b> Street sweeping is the best way to obtain quantifiable pollution reduction.						
	<b>Measurable Goal:</b> Streets will be swept an average of one day per month.						
	<b>BMP Assessment:</b> Keep BMP because this is a good way to show actual pollution reduction of street pollution kept out of storm drains.						
7*	<b>BMP: Develop procedures for controlling pollution from streets, storage areas, &amp; other city facilities.</b>	SW PW	Report new procedures	2021/22	1		In progress
	<b>Rationale:</b> Keeping the streets and facilities clean sets a good example for citizens and prevents blockages in the drainage system.						
	<b>Measurable Goal:</b> Clean drainage when problems arise. Respond to 100% of calls from citizens reporting blocked drainage.						
	<b>BMP Assessment:</b> Required BMP.						
8*	<b>BMP: Inspect City facilities</b>	all	Report # of facilities inspected	All years	A		
	<b>Rationale:</b> Helps us keep City facilities in compliance.						
	<b>Measurable Goal:</b> Regulated facilities inspected quarterly (by Dept Heads sending reports to SW) and other facilities inspected annually						
	<b>BMP Assessment:</b> Required BMP. Keep.						
9	<b>BMP: Trash and solid waste collection program (1 big trash event per year or 6 free dump days)</b>	PW, SW	Report amount of X tons of trash, (X cubic yards, X trailers)	All years	A,1		
	<b>Rationale:</b> These events help keep things from being dumped into creeks and ravines.						
	<b>Measurable Goal:</b> 1 big trash event will be offered each permit cycle.						
Met	<b>BMP Assessment:</b> Keep BMP since it offers a way for the public to dispose of big trash items for free as long as Sanitation can provide.						
10	<b>BMP: Host Community Recycling Events – ( 1 event per year, usually offered in Nov &amp; April)</b>	Sanitation	(Report date and data from events)	All years	B,O		
	<b>Rationale:</b> These events give people a chance to recycle things that are normally difficult to dispose of or recycle.						
E5	<b>Measurable Goal:</b> 1 recycling event will be offered every year.						
	<b>BMP Assessment:</b> Keep BMP as long as Sanitation can provide this service at least once per year.						