



**City of Independence
TMDL Implementation Tracking Matrix
POLLUTANT: Temperature**



TMDL Implementation Tracking Matrix: Independence, Oregon
Compliance Years: 2024 - 2028

Revised By:
Date:

Pollutant: Temperature							
SOURCE <i>What sources of this pollutant are under your jurisdiction?</i>	STRATEGY <i>What is being done, or what will you do, to reduce and/or control pollution from this source?</i>	HOW <i>Specifically, how will this be done?</i>	FISCAL ANALYSIS <i>What is the expected resource need? Are there existing resources budgeted? If not, where will the resources come</i>	MEASURE <i>How will you quantitatively or qualitatively demonstrate successful implementation or completion of this strategy?</i>	TIMELINE <i>When do you expect it to be completed?</i>	MILESTONE <i>What intermediate goals do you expect to achieve, and by when, to know progress is being made?</i>	STATUS <i>Include summary and date.</i>
Lack of shading in riparian areas (solar radiation)	Protect and enhance existing vegetation in riparian areas	Development code (Subchapter 54) contains riparian setback requirements. Planning Department to enforce code requirements and track the number of violations.	Private Development Funds	Create baseline GIS map of existing riparian area using available materials and estimate the percent of coverage. Complete an assessment in the change of the percent of coverage by comparing following years to the baseline map on a bi-yearly schedule.	Ongoing	Create baseline aerial imagery by 2025. Document progress towards implementation of an updated stormwater system map in the annual report. Begin annual assessments in 2026. Compare annual assessment to baseline aerial imagery figure and include annual aerial imagery figure and assessments in annual	2024 - 2025 - 2026 - 2027 - 2028 -
	Protect and enhance existing vegetation in riparian areas	Provide formal support and recommendations for community riparian tree planting projects	Stormwater budget allocates funds to Luckiamute Watershed Council (LWC) for work in Ash Creek	Receive yearly report from LWC on improvements completed during the year	Ongoing	Ongoing financial support provided for riparian tree planting projects	2024 - 2025 - 2026 - 2027 - 2028 -
	Protect and enhance existing vegetation in riparian areas	Add information on shading vegetation and water temperature on City website and City Hall front counter	Staff time for website updates and printing costs for flyers	At least one web page with information and one fact sheet at front counter	Ongoing	Monitor materials at front counter and restock as needed	2024 - 2025 - 2026 - 2027 - 2028 -
	Protect and enhance existing vegetation in riparian areas	Continue to enhance riparian corridor along proposed Ash Creek Trail	Parks Funds, grants	Number of trees procured and planting in designated areas	Ongoing	Enhancements will be completed as part of new park projects as funding allows.	2024 - 2025 - 2026 - 2027 - 2028 -
	Partner with watershed groups; Luckiamute Watershed Council	Maintain contact with LWC for project participation	Staff time for coordination and dedicated stormwater funding	Meet with LWC to identify at least one (1) enhancement project and provide funding.	Ongoing	Meet with the LWC by the end of fiscal year 2023 to assess potential project(s). Budget for identified project(s) and provide \$2,500 in funding to LWC during the applicable fiscal year.	2024 - 2025 - 2026 - 2027 - 2028 -
		Provide formal support (and resources as available) for LWC projects	Stormwater Utility Funds, Parks Funds, grants	Track the number of City-partnered LWC projects	Ongoing	Formal support provided for LWC projects as they are proposed or identified and budget allows.	2024 - 2025 - 2026 - 2027 - 2028 -
Wastewater treatment plant discharge	No discharge from the City's WWTP is allowed between June 1st and October 31st. Maintain effluent low temperatures (monitoring indicates compliance)	Maintain compliance with NPDES permit requirements	Sewer Utility Funds	Monitor effluent and river temperatures as a condition of the City's NPDES permit	Ongoing	Meet NPDES permit requirements	2024 - 2025 - 2026 - 2027 - 2028 -



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Pet and animal waste stormwater treatment	Reduce the amount of pet waste that is not properly disposed	Install pet waste stations including bags, education signs, and other information in parks	Park Funds/donations	At least ten pet waste stations installed, and information posted on City's website	Completed and ongoing	Determine locations and prepare news release to inform residents about new stations	2024 - 2025 - 2026 - 2027 - 2028 -
Bacteria carried to waterways in storm runoff	Treat new development stormwater before discharge	Public Works Design Standards (PWDS) requires that stormwater be managed onsite.	Stormwater Utility Funds	Enforce standards and prohibit building permits until all conditions are met	Ongoing and dependent on when and if development occurs.	Review code and coordinate with Stormwater Master Plan and PWDS	2024 - 2025 - 2026 - 2027 - 2028 -
	Reduce stormwater runoff from new development	Development code (Subchapter 54) contains landscaping requirements	Stormwater Utility Funds	Enforce standards and prohibit building permits until all conditions are met	Ongoing and dependent on when and if development occurs.	Review code and coordinate with Stormwater Master Plan and PWDS	2024 - 2025 - 2026 - 2027 - 2028 -
	Update Stormwater Master Plan with specifics on water quality considerations and priorities	Update existing Stormwater Master Plan with pollution reduction strategies	Stormwater System Development Charges	City Council adopts updated Stormwater Master Plan	September 2025	Adopt budget for fiscal year 2023-24	2024 - 2025 - 2026 - 2027 - 2028 -
	Update Stormwater Management Plan with specifics on water quality considerations and priorities	Create stormwater system map and identify areas where water quality project actions would have the greatest benefit	Stormwater System Development Charges	City Council adopts updated Stormwater Master Plan	September 2025	Adopt budget for fiscal year 2023-24	2024 - 2025 - 2026 - 2027 - 2028 -
	Prevent dumping into storm drain	Mark storm drains	Stormwater Utility Funds	Number of markers installed	Ongoing	Mark ten (10) storm drains annually.	2024 - 2025 - 2026 - 2027 - 2028 -
Wastewater treatment plant discharge	Maintain low bacteria levels in WWTP effluent	Treatment and chlorination in compliance with NPDES permit requirements.	Sewer Utility Funds	Monitor bacteria levels as condition of NPDES permit.	Ongoing	Meet NPDES permit requirements.	2024 - 2025 - 2026 - 2027 - 2028 -

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Mercury Measure #1A	Pollution Prevention and Good Housekeeping for Municipal Operations	Clean roadways and storm system with the General Provisions provided under Section 3.17.d of the Stormwater Managements plan under "Manholes and Catch Basins"	Stormwater Utility Fund	Provide an approx. amount of roads swept and storm pipes cleaned with storm pipe cleaned in lengths of feet and streets swept in tons of debris collected.	Completed and ongoing	Implement asset management and work order system to begin tracking workflow; Maintain records for tons of material disposed, catch basins cleaned, and lineal feet of pipe cleaned each year.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #1B	Pollution Prevention and Good Housekeeping for Municipal Operations	Ensure city owned or operated facilities with industrial activity identified in DEQ's 1200-Z Industrial Stormwater General Permit have coverage under this permit.	Stormwater Utility Fund	Assess City Facilities for industrial activities, and have owners report and maintain a 1200-Z permit.	Completed and ongoing	Maintain records for activities to meet program requirements and include a descriptive summary of activity in annual	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #1C	Pollution Prevention and Good Housekeeping for Municipal Operations	House water quality materials on Public Works Reports and Resources The City of Independence Oregon - Official Website	Stormwater Utility Fund	Provide weblink in annual report to illustrate programs such as tree protection, leaf program	12/31/2023	Quarterly check in and review of Public Works webpage.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #2A	Public Education and Outreach	Add information on hazardous waste and water quality to City website and City Hall front counter	Stormwater Utility Fund	Provide one (1) or more weblinks with information about water quality and hazardous waste to the City website along with one (1) or more fact sheets at the front	Completed and ongoing	Provide at least one (1) weblink and one(1) fact sheet with information on water quality and hazardous waste. Monitor provided materials at the front counter and restock information pamphlets as needed.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #2A	Public Education and Outreach	Complete a qualitative evaluation of one stormwater related education and outreach.	Stormwater Utility Fund	Track and assess progress toward implementation of the program by evaluating the effectiveness of the public education and outreach	Annually	Annually with the TMDL implementation report.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #2A	Public Education and Outreach	Partner with the Luckiamute Watershed Council to provide at least one (1) education or outreach effort annually. Efforts will target the City Council, public, homeowners, homeowner associations, school children, or businesses including home-based and mobile businesses.	Stormwater Utility Fund	Track and assess outreach and educational efforts. Qualitative assessment will depend on the type of education / outreach (e.g., number of clicks if social media, amount of restocking of printed media, attendance at public meetings, etc.)	Report on efforts annually with the TMDL implementation report.	Annually with the TMDL implementation report.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #2B	Public Education and Outreach	Review complaints or concerns reported on-line and target education and outreach to developers, contractors, and community as needed.	Stormwater Utility Fund	Review and document in TMDL report annual number of stormwater information sent out by website, email, or mailings to address complaints or concerns.	Started September 2022 and ongoing annually.	Post links to Polk County Stormwater Resources and EPA NPS pages. Add targeted links as needed to Stormwater Management Page.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #3A	No discharge from the City's WWTP is allowed between June 1st and October 31st. Maintain effluent low temperatures (monitoring indicates compliance)	Maintain compliance with NPDES permit requirements	Stormwater System Development Charges	Sign in sheet at public meetings and collection of written comments.	Completed and ongoing activity. Goal is for adoption of master plan in 2025.	Public notification of draft master plan documents for review and comment once project is underway.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #3B	Public Involvement and Participation	TMDL plan and progress reports will be posted on a publicly accessible website.	Stormwater Utility Fund	Annual report weblink for plan and reports	Updated information on website on or before Nov 30, 2022. Annual updates thereafter.	Post Plan and reports on webpage.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #4A	Illicit Discharge Detection and Elimination	Develop and maintain a current map of stormwater conveyance system. 1. System map and digital inventory must include the location of outfalls and an outfall inventory, conveyance system and stormwater control locations. 2. For digital - Describe mapping standards in the TMDL plan or other city document.	Stormwater Utility Fund	City currently has a paper map from the 2005 Stormwater Master Plan. Goal is to transfer this data into a new asset management system in 2023 followed by an update as part of the Stormwater Master Plan Update in 2024.	2025 and ongoing	Describe digital mapping standards in the forthcoming Stormwater Master Plan by September 2024. Create initial digital stormwater conveyance system map by January 2025. Maintain mapping through City's asset management system (ongoing)	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #4B	Illicit Discharge Detection and Elimination	Prohibit non-stormwater discharges into the stormwater conveyance system through enforcement of an ordinance or other legal mechanism, including appropriate enforcement procedures and actions to ensure compliance.	Stormwater Utility Fund	Provide report of any violations and resolution as part of annual TMDL report.	Ongoing.	Anticipate tracking of code violations quarterly or as needed with code compliance committee.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #4C	Illicit Discharge Detection and Elimination	Develop and maintain a procedure or system to document all complaints or reports of illicit discharges into and from the stormwater conveyance system.	Stormwater Utility Fund	Track through IndyWorks and asset management system.	Completed and ongoing	Currently tracking through IndyWorks and anticipate tracking resources and manhours to resolving complaints.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #4D	Illicit Discharge Detection and Elimination	Ordinance defines the range of illicit discharges it covers, including those discharges that are conditionally allowed, such as groundwater and lawn watering discharges.	Stormwater Utility Fund	Adoption of updated stormwater ordinance.	Concurrent or shortly thereafter adoption of an updated Stormwater Master Plan.	Anticipate development of language as part of Stormwater Master Plan update.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #4E	Illicit Discharge Detection and Elimination	Maintain industrial users list. Monitor discharge complaints.	Stormwater Utility Fund	Periodic Industrial Users Survey and number of code violations	Completed and ongoing	Update Stormwater Master Plan by 2025 and municipal stormwater code by 2027.	2024 - 2025 - 2026 - 2027 - 2028 -



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Mercury Measure #5A	Construction Site Runoff Control	Refer project to DEQ site, or the appropriate DEQ agent, to obtain NPDES 1200-C Construction Stormwater Permit coverage for construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres).	Stormwater Utility Funds/Private Development Funds	Track through plan approval and issuance of Public Works Permit. Review Code and Public Works Design Standards periodically.	Completed and ongoing	Enforce design standards adopted by IMC Chapter 26, prohibiting issuance of Public Works Permit without proof of active 1200-C permit.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #5B	Construction Site Runoff Control	Through ordinance or other regulatory mechanism, require construction site operators to complete and implement an Erosion and Sediment Control Plan for construction project sites in its jurisdictional area that result in a minimum land disturbance of 21,780 square feet (one half of an acre) or more, and are not already covered by a 1200-C permit. Require erosion and sediment controls, and waste materials control from initial clearing through final	Staff time/Private Development Funds	Notify developer of requirement to comply with Public Works Standards and Public Works Permit requirements. Issue stop work order on projects not in compliance with standards and permit requirements.	September 2025	Goal is to notify development representatives during pre-construction meeting of requirement to comply with DEQ rules and DEQ inspectors.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #5C	Construction Site Runoff Control	Develop, implement and maintain a written escalating enforcement and response procedure for all qualifying construction sites. The procedure must address repeat violations through progressively stricter response, as needed, to achieve compliance.	Staff time	Document violations in inspection reports. Notify DEQ representative of observed non-compliance. Withhold building permits until conditions are met.	September 2025	Goal is to Review code and coordinate with Stormwater Master Plan and Public Works Standards.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #5D	Construction Site Runoff Control	Add information on stormwater and erosion and sediment control to the City website and City Hall front counter	Stormwater Utility Funds	Provided information on website and fact sheets at front counter	Completed and ongoing	Review code and Public Works Standards periodically for compliance. Monitor materials at front counter and restock as needed	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #6A	Post Construction Site Runoff for New Development and Redevelopment	Development code (Subchapter 54) contains landscaping requirements	Construction Through Private Development Funds. Ongoing O&M through the property owner for private developments and Stormwater Utility Funds for Public Improvements.	Planning and Building Department's to enforce code requirements and track the number of violations	Completed and ongoing	Review code and coordinate with Stormwater Master Plan and Public Works Standards	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #6B	Post-Construction Site Runoff for New Development and Redevelopment	By ordinance or other mechanism, require project sites discharging stormwater that create or replace 10,890 square feet (1/4 acre) or more of new impervious surface area to: (A) Use stormwater controls at all qualifying sites. (B) Use site-specific stormwater management approach targeting natural surface/predevelopment hydrological function through installation and long-term O&M of stormwater controls. (C) Provide long-term O&M of stormwater controls at project sites that are under the ownership of a private entity. Standards must target natural surface/ predevelopment hydrologic function to retain rainfall on-site and minimize discharge of precipitation through stormwater controls that infiltrate/evapotranspire stormwater. If unable to retain, rainfall/runoff from impervious surfaces on-site, the remainder must be treated prior to discharge with structural stormwater controls. Stormwater structural controls should remove at least 80 percent of the TSS.	Construction Through Private Development Funds. Ongoing O&M through the property owner for private developments and Stormwater Utility Funds for Public Improvements.	Planning and Building Department's to enforce code requirements and track the number of violations	September 2025	Review code and coordinate with Stormwater Master Plan and Public Works Standards	2024 - 2025 - 2026 - 2027 - 2028 -



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	Update Stormwater Management Plan with specifics on water quality considerations and priorities	Create stormwater system map and identify areas where water quality project actions would have the greatest benefit	Stormwater System Development Charges	City Council adopts updated Stormwater Master Plan	September 2025	Adopt budget for fiscal year 2023-24	2024 - 2025 - 2026 - 2027 - 2028 -
	Prevent dumping into storm drain	Mark storm drains	Stormwater Utility Funds	Number of markers installed	Ongoing	Mark ten (10) storm drains annually.	2024 - 2025 - 2026 - 2027 - 2028 -
Wastewater treatment plant discharge	Maintain low bacteria levels in WWTP effluent	Treatment and chlorination in compliance with NPDES permit requirements.	Sewer Utility Funds	Monitor bacteria levels as condition of NPDES permit.	Ongoing	Meet NPDES permit requirements.	2024 - 2025 - 2026 - 2027 - 2028 -

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Mercury Measure #1C	Pollution Prevention and Good Housekeeping for Municipal Operations	House water quality materials on Public Works Reports and Resources The City of Independence Oregon - Official Website	Stormwater Utility Fund	Provide weblink in annual report to illustrate programs such as tree protection, leaf program	12/31/2023	Quarterly check in and review of Public Works webpage.	2024 - 2025 - 2026 - 2027 - 2028 -
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Mercury Measure #2A	Public Education and Outreach	Complete a qualitative evaluation of one stormwater related education and outreach.	Stormwater Utility Fund	Track and assess progress toward implementation of the program by evaluating the effectiveness of the public education and outreach program.	Annually	Annually with the TMDL implementation report.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #2A	Public Education and Outreach	Partner with the Luckiamute Watershed Council to provide at least one (1) education or outreach effort annually. Efforts will target the City Council, public, homeowners, homeowner associations, school children, or businesses including home-based and mobile businesses.	Stormwater Utility Fund	Track and assess outreach and educational efforts. Qualitative assessment will depend on the type of education / outreach (e.g., number of clicks if social media, amount of restocking of printed media, attendance at public meetings, etc.)	Report on efforts annually with the TMDL implementation report.	Annually with the TMDL implementation report.	2024 - 2025 - 2026 - 2027 - 2028 -
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Mercury Measure #3A	No discharge from the City's WWTP is allowed between June 1st and October 31st. Maintain effluent low temperatures (monitoring indicates compliance)	Maintain compliance with NPDES permit requirements	Stormwater System Development Charges	Sign in sheet at public meetings and collection of written comments.	Completed and ongoing activity. Goal is for adoption of master plan in 2025.	Public notification of draft master plan documents for review and comment once project is underway.	2024 - 2025 - 2026 - 2027 - 2028 -
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Mercury Measure #4A	Illicit Discharge Detection and Elimination	Develop and maintain a current map of stormwater conveyance system. 1. System map and digital inventory must include the location of outfalls and an outfall inventory, conveyance system and stormwater control locations. 2. For digital - Describe mapping standards in the TMDL plan or other city document.	Stormwater Utility Fund	City currently has a paper map from the 2005 Stormwater Master Plan. Goal is to transfer this data into a new asset management system in 2023 followed by an update as part of the Stormwater Master Plan Update in 2024.	2025 and ongoing	Describe digital mapping standards in the forthcoming Stormwater Master Plan by September 2024. Create initial digital stormwater conveyance system map by January 2025. Maintain mapping through City's asset management system (ongoing)	2024 - 2025 - 2026 - 2027 - 2028 -
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Mercury Measure #4D	Illicit Discharge Detection and Elimination	Ordinance defines the range of illicit discharges it covers, including those discharges that are conditionally allowed, such as groundwater and lawn watering discharges.	Stormwater Utility Fund	Adoption of updated stormwater ordinance.	Concurrent or shortly thereafter adoption of an updated Stormwater Master Plan.	Anticipate development of language as part of Stormwater Master Plan update.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #4E	Illicit Discharge Detection and Elimination	Maintain industrial users list. Monitor discharge complaints.	Stormwater Utility Fund	Periodic Industrial Users Survey and number of code violations	Completed and ongoing	Update Stormwater Master Plan by 2025 and municipal stormwater code by 2027.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #5A	Construction Site Runoff Control	Refer project to DEQ site, or the appropriate DEQ agent, to obtain NPDES 1200-C Construction Stormwater Permit coverage for construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres).	Stormwater Utility Funds/Private Development Funds	Track through plan approval and issuance of Public Works Permit. Review Code and Public Works Design Standards periodically.	Completed and ongoing	Enforce design standards adopted by IMC Chapter 26, prohibiting issuance of Public Works Permit without proof of active 1200-C permit.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #5B	Construction Site Runoff Control	Through ordinance or other regulatory mechanism, require construction site operators to complete and implement an Erosion and Sediment Control Plan for construction project sites in its jurisdictional area that result in a minimum land disturbance of 21,780 square feet (one half of an acre) or more, and are not already covered by a 1200-C permit. Require erosion and sediment controls, and waste materials control from initial clearing through final stabilization.	Staff time/Private Development Funds	Notify developer of requirement to comply with Public Works Standards and Public Works Permit requirements. Issue stop work order on projects not in compliance with standards and permit requirements.	September 2025	Goal is to notify development representatives during pre-construction meeting of requirement to comply with DEQ rules and DEQ inspectors.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #5C	Construction Site Runoff Control	Develop, implement and maintain a written escalating enforcement and response procedure for all qualifying construction sites. The procedure must address repeat violations through progressively stricter response, as needed, to achieve compliance.	Staff time	Document violations in inspection reports. Notify DEQ representative of observed non-compliance. Withhold building permits until conditions are met.	September 2025	Goal is to Review code and coordinate with Stormwater Master Plan and Public Works Standards.	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #5D	Construction Site Runoff Control	Add information on stormwater and erosion and sediment control to the City website and City Hall front counter	Stormwater Utility Funds	Provided information on website and fact sheets at front counter	Completed and ongoing	Review code and Public Works Standards periodically for compliance. Monitor materials at front counter and restock as needed	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #6A	Post Construction Site Runoff for New Development and Redevelopment	Development code (Subchapter 54) contains landscaping requirements	Construction Through Private Development Funds. Ongoing O&M through the property owner for private developments and Stormwater Utility Funds for Public Improvements.	Planning and Building Department's to enforce code requirements and track the number of violations	Completed and ongoing	Review code and coordinate with Stormwater Master Plan and Public Works Standards	2024 - 2025 - 2026 - 2027 - 2028 -
Mercury Measure #6B	Post-Construction Site Runoff for New Development and Redevelopment	By ordinance or other mechanism, require project sites discharging stormwater that create or replace 10,890 square feet (1/4 acre) or more of new impervious surface area to: (A) Use stormwater controls at all qualifying sites. (B) Use site-specific stormwater management approach targeting natural surface/predevelopment hydrological function through installation and long-term O&M of stormwater controls. (C) Provide long-term O&M of stormwater controls at project sites that are under the ownership of a private entity. Standards must target natural surface/ predevelopment hydrologic function to retain rainfall on-site and minimize discharge of precipitation through stormwater controls that infiltrate/evapotranspire stormwater. If unable to retain, rainfall/runoff from impervious surfaces on-site, the remainder must be treated prior to discharge with structural stormwater controls. Stormwater structural controls should remove at least 80 percent of the TSS.	Construction Through Private Development Funds. Ongoing O&M through the property owner for private developments and Stormwater Utility Funds for Public Improvements.	Planning and Building Department's to enforce code requirements and track the number of violations	September 2025	Review code and coordinate with Stormwater Master Plan and Public Works Standards	2024 - 2025 - 2026 - 2027 - 2028 -