

Existing Plan Checklist for Willamette TMDL Implementation Plan Development

Larger Designated Management Agencies (DMAs) are likely to have many of the management strategies developed in other documents. The goal here will be to reference what has been developed, evaluate if it is adequate or if gaps are to be filled, and fill in those gaps. The plan may be short with references to appropriate portions of other documents. A summary matrix will still be useful for pulling all of the strategies together in one document.

The Management Strategy Checklist (a separate checklist) goes through key actions, parameter by parameter. For larger DMAs, it is suggested that the following documents are reviewed and key actions are identified and evaluated relative to the listed parameters. The Management Strategy Checklist can be used in this evaluation:

- NPDES permits:
 - Are there problems that have been identified or suspected – e.g. I/I problems; by-pass problems; treatment problems; plans to update system, especially in the next permit cycle; is financing in place,
 - Pretreatment program – especially for mercury

- Phase I MS4 permits:
 - Highlight programs, pollutant load reduction benchmarks and performance measures contained in the Stormwater Management Plan that address TMDL pollutants.
 - Are there gaps in coverage (e.g. storm water runoff from private entities not covered by permit, such as malls?) Identify them and determine if they are significant and should be addressed at this time or evaluated through adaptive management.

- Phase II MS4 permits:
 - Highlight general strategies to address the six major program elements – education and outreach; public involvement; illegal discharge detection and elimination; construction site runoff; post construction BMPs, and pollution prevention.
 - Are there gaps in coverage (e.g. storm water runoff from private entities not covered by permit, such as malls?) Identify them and determine if they are significant and should be addressed at this time or evaluated through adaptive management.

- Other stormwater permits – 1200-C, 1200-Z, 1200-COLS:
 - Is DMA aware of the 1200C program, are they an agent or interested in being an agent for the program, does it have an opportunity to provide information about the program and to encourage builders to comply.

- On-site Program:
 - Are areas of on-site concerns known; are there plans for providing sewers or up-grading systems, opportunities for addressing concerns working with county on-site program, are there opportunities for home owner education?
- Road Practices:
 - What practices are followed for road operation and maintenance; Road Construction, Bridges? Are they comparable to ODOT practices? Is there a training program set up?
- Local Comp Plan:
 - Riparian protection: what types of buffers are currently provided? Would these meet safe harbor designations?
 - Is growth occurring or planned? Are there erosion control ordinances that would address erosion from sites less than one acre? Are there controls to limit development in flood plains and to limit impervious surfaces in new development?
 - Is a Comp Plan review coming up? If so, what controls have been developed or are proposed for addressing storm water, what is identified in local comp plan and when is the next update
- DMA Properties (e.g. parks, etc):
 - Does the DMA have park lands and other municipal areas where riparian areas can be restored? Are there active partnerships (e.g. watershed councils, etc) for watershed restoration with which the city could become involved? Are there efforts for improving other riparian functions – stream structure, enhance hyporeic flow, cold water refugia, etc. Are there possible trading opportunities?
- Education:
 - Are there educational opportunities for addressing pet and other animal waste management? Are there areas where animal wastes are of concern (coordinate with ODA/SWCD if agriculturally related)
- Other Plans:
 - Is the DMA involved in other planning efforts that could be part of the management plan such as plans developed by watershed councils, efforts to address Endangered Species Act requirements, etc.
- Coordination:
 - Are there opportunities to work with watershed councils, SWCDs or other groups to address restoration needs on a watershed basis?

Other Linkages:

It would be good to look at cross-programmatic opportunities where several environmental concerns can be addressed:

- Source Water Assessment – does the DMA have an assessment for its drinking water source? Are there common elements that could be used in both plans?
- Underground Injection Control – are there sumps used, especially for storm water? Are they registered or covered under a permit? Are there common elements that could be used in both plans?
- Clean up concerns
- Recycling
- Hazardous Waste Generation