

City of Springfield

TMDL Implementation Plan Annual Report 12-13



Ash Meadows Wetlands 2013



July 1, 2012 thru June 30, 2013

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Purpose

This document fulfills the requirements for annual reporting of progress towards meeting the long term goals of the City of Springfield's Total Maximum Daily Load Implementation Plan (TMDL IP), as required by the City's TMDL IP dated and approved by the Oregon Department of Environmental Quality (Oregon DEQ) in April of 2009, and provision OAR 340-042-0080 (3) of the Oregon Administrative Rules addressing non-point source pollution.

The purpose is to document progress through the tracking of goals set forth in Springfield's TMDL IP and to present modifications and amendments through adaptive management of the plan.

Springfield submitted its first Annual Report in Oct 2009; that document covered the reporting period from July 1st, 2008 to June 30th, 2009. Springfield's Second Annual Report covered the reporting period from July 1st, 2009 to June 30th, 2010. The Third Report covers the reporting periods from July 1, 2010 to June 30, 2011 and July 1, 2011 to October 31, 2011. The Fourth Annual Report was included in the City's MS4 Annual Report for the time frame July 1, 2011 to June 30, 2012 and was submitted by November 1st 2012. This Fifth Annual Report covers the time frame from July1, 2012 to June 30, 2013 and is due to the Oregon DEQ by November 1st, 2013.

Springfield submitted its application for the City's MS4 permit renewal June 30, 2011. At that time, the DEQ was considering TMDL pollutants and their waste load allocations (WLA) included as part of the MS4 permits best management practices for pollution reduction by using either qualitative or quantitative benchmarks and goals. Springfield's TMDL IP was incorporated into the proposed Stormwater Management Plan (SWMP) that was submitted with the renewal application for its MS4 permit. TMDL goals and tasks were incorporated as part of the Minimum Control Measures and BMP's. Springfield is still under an administratively extended permit status and is not expected to receive its MS4 Permit renewal until 2014-2015. The MS4 renewal timeline does not align with Springfield's TMDL IP renewal timeline. Springfield is expected to submit its 5 Year Review Report to the DEQ by April 2014 and at that time may be expected to submit its next 5 Year Plan.

All goals and tasks outlined in Springfield's TMDL IP have been completed. Most goals will continue as implementation measures in the City's proposed SWMP dated June 2011. The SWMP was submitted as part of the MS4 permit renewal process.

Background

The Oregon DEQ set water quality standards to protect waterways in the region for beneficial uses such as domestic drinking water supply, fishing, water contact recreation, fish spawning, and irrigation. Streams, lakes, and rivers that do not meet these standards are included in a list of impaired water bodies. This list, developed in response to Section 303(d) of the Clean Water Act,

is referred to as the 303(d) list and contains the names and descriptions of waterways, or sections of waterways, that have failed to meet state water quality standards for one or more listed pollutants.

Both the McKenzie and Willamette Rivers fail to meet state water quality standards for temperature. The Willamette also fails to meet water quality standards for bacteria, and through a complex analysis, has been listed as not meeting state standards for mercury. The Springfield public stormwater drainage system discharges to both of these waterways.

The Oregon Administrative Rule (OAR 340-042-0025) that addresses TMDLs requires local governments, agencies, or major facilities to develop TMDL Implementation Plans for 303(d)-listed waterways within their jurisdiction.

Regulatory Context

This report is submitted to the Oregon DEQ to satisfy the requirements of OAR 340-042-0080 (3)(a)(C) *Provide for performance monitoring with a plan for periodic review and revision of the implementation plan.* All Designated Management Agencies (DMAs) are expected to “implement and revise the plan as needed” [OAR 340-042-0080 (3)(b)].

Reporting Requirements

This Annual Report is required to include the progress and/or status of Springfield’s TMDL Implementation Plan’s measureable goals. Oregon DEQ refers to this type of monitoring as implementation monitoring and the progress report as an Annual Report. The City of Springfield has chosen to use the **TMDL Implementation Tracking Matrix** as a tool for describing, tracking and reporting TMDL implementation efforts listed under its Plan.

The Implementation Tracking Matrix will provide information about each strategy, implementation methods for each and progress or status in meeting the plan’s goals.

While the Implementation Schedule presented in the Implementation Tracking Matrix is realistic, unforeseeable events can and do occur: budget shortfalls, staffing limitations, and changing priorities can impact the rate or success of implementation. For that reason, monitoring to ensure timely and effective program implementation is an important element of the Plan.

The City’s TMDL IP’s goals and strategies implementation timelines ended in 2010. The City is continuing to implement existing programs and further projects and goals. Some current projects do not have a listed goal or task directly related. Therefore, the City is listing goals and tasks relevant to address the City’s WLA for temperature, bacteria, and mercury.

Summary of Work Accomplishments

This section is a brief summary of the work that has been done in the reporting period for each of the pollutants. See Table 2 TMDL Implementation Tracking Matrix for completion status.

Temperature:

- T1 - Inventory Existing and Potential Shade and Enhancement Areas
 - A desktop assessment and a priority list have been completed. This was accomplished in year 1 reporting. This effort is being continued with a channel restoration priority project list to incorporate the projects into the City CIP process. Some sites have been planted.
 - Continued work on potential sites for shade planting – discussion includes ongoing projects along the Q Street Floodway and new opportunities. The large event that was held in recognition of Arbor Day where over a 100 students planted more than 100 trees and over 20 plants along the top of the south bank continues to be monitored. Plantings along Jasper Slough’s conservation area of Filbert Meadows and along the lower Mill Race at the South 2nd Street property were monitored and watered by City staff and volunteer work groups weeded and cleared invasive plants. Youth Day of Caring students planted replacement trees along Jasper Slough at Filbert Meadows.
 - The Mill Race Restoration Project Phase 1 is complete. Shade planting was a priority at this site with canopy trees being planted along the channel banks. Phase 2 of the project, the pond/wetland areas, has been completed with canopy trees being planted along the main channel.
 - A stormwater treatment park along the north bank of the Mill Race is in the development stages. A feasibility study is under way. This facility will also provide education and a trail system.
 - The Lower Mill Race project continues to acquire land for future enhancement projects.
 - Efforts continued with the Metro Waterways Projects along Cedar Creek. Efforts have been to partner with McKenzie Watershed Council and to provide shade planting projects along the banks. Riparian shade credit proposals for MWMC were approved for sections along the Mill Race that were not part of the ACOE restoration project. The project cleared invasive vegetation and planted trees – watering and monitoring is ongoing.
 - The City submitted 1 grant proposal and was partners in a 2nd grant that were submitted for riparian enhancement work.

- T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement
 - The review of Springfield Development Code to include new technology, designs and ideas for improving water quality was completed. Low Impact Development Approaches, Engineering Design Standards and the Development Code continues

to be reviewed and improved upon to optimize shading, address pervious pavements, and stormwater discharge alternatives.

- Updates were drafted for Springfield's Engineering Design Standards and Procedures Manual for chapters pertaining to water quality facilities, water quantity, facility design, vegetation and tree standards, riparian enhancement, and erosion prevention and sediment control. Revisions were adopted by Springfield City Council
 - Updates were drafted to Springfield Development Code for riverfront development, riparian enhancement, and Greenway Plan District. The Codes were adopted by Springfield City Council.
 - Staff continues to work with developers, through the development review process, on providing large canopy trees, minimizing pervious surface and/or incorporating additional vegetation into planned project sites.
 - The Sustainable City of the Year Project "Demonstration Stormwater Areas" was constructed and planted. This included a demonstration rain garden, pervious paver path, and nativescape. Monitoring and watering continues.
 - Volunteers worked at removing invasive plants along the Mill Race's south bank at S. 2nd Street in preparation of replanting with trees and shrubs. Additional volunteer work was done along the swale at Filbert Meadows where students planted native vegetation.
 - The Clean Water Gardens Program held rain garden workshops and booth events that resulted in the installation of nativescapes, rain gardens, brochure distribution, a rain barrel given away, and native plants given to citizens.
 - The City submitted 1 grant proposal and was partners in a 2nd grant that were submitted for riparian enhancement work.
 - Three new residential construction lots installed rain gardens and one site installed a rainwater harvesting system, qualifying for an SDC discount for runoff reduction.
- T3 - Manage Industrial Warm Water Discharges
 - Staff continues to review numerous 1200z permits and Pollution Control Plans for industries in Springfield's jurisdiction and provides comments to DEQ. Staff has had multiple conversations with warm water dischargers in the area discussing options such as recirculation and cooling processes in an effort to reduce or eliminate these permitted discharges. Five permits were reviewed and comment provided.
 - Additionally, staff has worked with one industry to switch cooling water over to a reuse system for irrigation. This site is identified as sensitive because of its location to the river and drinking wells that are in the area. Ultimately, due to

contamination levels of the discharge water and the proximity to the river and drinking water wells, no reuse system was developed for this facility.

- The WQ Facility Inventory and Inspection Program continued to inventory, inspect, and enforce compliance for private sites. Some of them are industrial sites with warm water discharges.
 - Water Resource staff compiled a list of known boilers within the City Limits and will work on a process to ensure proper blow down, permitting, and compliance. The washwater permitted sites are also being considered for site investigations.
 - Educational outreach materials were developed and distributed to mobile pressure washing companies, pressure washing rental companies and home improvement centers that sell pressure washers. The material addresses warm water discharges and City regulations.
- T4 – Public Outreach and Education
 - Staff continues to revise and update existing education and outreach materials and participate in Clean Water Workshops in elementary and middle schools, Channel Restoration school projects, Earth Day, Regional Pressure Washing Campaign, Fish Friendly Car Wash Kits, Public Works Week, Environmental Leadership Awards, Career Day, Youth Day of Caring, Lane County Home Show, and garden shows.
 - A Clean Water Garden booklet series that focuses on water harvesting, stream side gardening and riparian planting continues to be popular to home owners and residents. Information on temperature as a pollutant and canopy tree planting is included in the material.
 - Staff posted door hangers in neighborhoods that had high occurrences of yard waste dumping which kills vegetation, exposes banks, and increases stream temperature. An additional posting about water quality facilities, vegetated treatment, and canopy trees was distributed in some areas that have vegetated facilities.
 - Material has been developed and continues to be distributed to mobile pressure washing companies, pressure washing rental companies and home improvement centers that sell pressure washers. The material addresses warm water discharges and City regulations.
 - IDDE response and enforcement continued in response to temperature related discharges.
 - Work with the Sustainable City of the Year Projects and the U of O completed a stormwater demonstration project (plans and construction). The project area was constructed and planted; monitoring and watering continues.
 - Stormwater runoff and water quality presentations were given to clubs, watershed groups, Springfield City Council, and HOA's.

- A Clean Water Garden booklet series that focuses on water harvesting, stream side gardening and riparian planting continues to be popular to home owners and residents. Information on temperature as a pollutant and canopy tree planting is included in the material.
- School workshops and class room discussion continue to include temperature as a pollutant discussion and the importance of trees along banks of streams.

The goals and tasks for temperature reduction as outlined in the TMDL IP have all been completed with deadlines being met. Under the City's proposed 2011 SWMP submitted with the City's MS4 permit renewal application, efforts for temperature reduction will continue with programs and tasks such as, seeking projects sites for shade and riparian enhancements, by seeking volunteer group participation, reviewing and improving upon City Code and Development Standards, to continue work on the Mill Race Restoration projects, and develop and distribute material addressing temperature as a pollutant of concern.

Bacteria:

- B1 - Sanitary Sewer Overflows (SSO) - Work Practices
 - SOPP's and SSO procedures and protocols have been reviewed, updated and adopted for City staff and are included in contractor provisions. The City continues to evaluate and adaptively manage its procedures and policies as needed, coordinating efforts with the Development and Public Works Operations Division, Police, Fire and Environmental Services staff.
 - SSO and SOPP procedures and protocols continue to be reviewed as needed and/or after an incident. Springfield continues to place high emphasis on providing the proper handling and reporting procedures to staff and regulatory agents in responding to any SSO within its jurisdiction.
 - Contractors working on new or existing sanitary systems under City supervision are provided with information for proper reporting.
 - IDDE staff continues to respond to and address bacteria related discharges.
 - Staff responded to 2 Sanitary Sewer Overflow's (SSO's) during this reporting period.

- B2 - Animal/Pet Waste - Program Enhancement
 - During the last reporting periods, meetings with Willamalane Parks and Recreation District, Springfield School District19, and City Operations Division staff identified additional locations for pet waste stations. Pet waste stations continue to be installed as locations are identified. Five additional stations went in this last year. Staff and partners continue to monitor stations, replace bags and evaluate new locations. Over 112 boxes of replacement bags went out this last reporting period.
 - Pet parks, kennels and pet daycare facilities have been identified and outreach material developed. Site inspections and technical assistance have been provided at two facilities in Springfield; one pet park and one pet day-care facility. City

staff continues to work with facilities on waste handling and problem areas as needed.

- Pet supply stores have been identified and outreach material developed and distributed in stores. Store owners were contacted and agreed to distribute pet waste management handout material. Educational material continues to be monitored, stocked, updated and replaced as needed.
 - Pet waste management for stormwater protection at public events is ongoing as is the City's participation with regional outreach groups. Staff continues to participate in events such as the Lane County Home Show, workshops in schools, Willamalane's Pet Fest, Springfield's annual Spring Clean-up, Earth Day Poster Contest, Canines for Clean Water Pledge Events, and Regional Pressure Washing Campaign.
 - The "Canines for Clean Water" program continues to be a success. Five public booth events at three locations were held during the reporting period resulting in a number of pledges. Willamalane Parks and Recreation helped in staffing and providing educational materials. The development and distribution of the Canine for Clean Water calendar continues to be a big hit; over 2000 calendars were distributed at local pet stores and other locations.
 - Discussions have continued with Willamalane Parks and Recreation District staff and the City's Operations staff regarding waterfowl and nutria feeding. "Please don't feed the wildlife" signs have been developed and continue to be installed at problem locations to deter animal feeding.
 - "Pick up after your pet" signs have been developed and continue to be installed at problem locations.
 - 108 door hangers went out in various neighborhoods, many of them in response to pet waste.
- B3 - Septic Tank, Transient Camping and Private Sanitary Infrastructure Outreach and Education
 - The septic tank inventory is complete; sites have been identified and mapped. Property owners have been contacted, educational material developed and distributed. Technical assistance has been provided in an effort to get eligible residents to hook up to the sanitary sewer and perform proper maintenance of septic systems. The inventory is continually updated with new connections to city sewer from septic tanks and newly discovered septic tanks are tracked. The inventory continues to be updated annually.
 - ESD staff created a new educational brochure, "A homeowner's guide to septic system maintenance," with SUB and Rainbow Water District. This brochure was mailed out to all property owners and residents in the Urban Transition Zone.
 - Research of local sanitary waste haulers showed that all local haulers are using the approved dumping and cleaning location at the Regional Water Pollution Control Facility. This task will continue to be monitored and is supported by the City "Hot Line" for citizen reports. The City has an active Illicit Discharge

Detection and Elimination (IDDE) program and responding personnel that investigate all illicit discharges as they become known.

- Staff continues to maintain and update educational material and the distribution of material. Technical assistance programs for carpet cleaners, pressure washers, and auto shops continue.
 - Meetings among Operations staff, Police, and Code Enforcement have been held. A list of known chronic transient camping sites has been developed, procedures documented and drafted and enforcement discussed. Sites that have a negative impact on health and/or water quality are cleaned up first, on a priority basis as funding allows. Known sites in Springfield are periodically monitored and assessed. Code Enforcement currently works with private owners who wish to deter campers. Multiple sites have been cleaned up along the rivers and local waterways. Sites will continue to be monitored, assessed, removed as needed, and discussions between internal agencies continue.
- B4 – Public Outreach and Education
 - Staff continues to revise and update existing education and outreach materials pertaining to bacteria and participate in activities including; Clean Water Workshops in elementary and middle schools, channel restoration school projects, participation in Earth Day, update of materials for the Regional Pressure Washing Campaign, update of the pet waste brochure for pet stores, distribution of pet waste door hangers in problem neighborhoods, participation in Environmental Education field sessions, participation in Public Works Week, and taking part in Career Day.
 - Staff will continue to install pet waste signs in problem areas and distribute door hangers in problem neighborhoods.
 - Implementation of a “Canines for Clean Water” program has proven to be well received and will continue to be an active program within budget and staffing constraints.
 - Pet supply stores have been identified as outreach distribution sites and will continue to be stocked with materials and event information.
 - Stormwater runoff and water quality presentations were given to clubs, watershed groups, City Council, and HOA’s.
 - Clean Water University provided classroom and hands on education on water quality. Nine classes (each class completes 10 one-hour workshops) were held this fiscal year.

The goals and tasks for bacteria reduction as outlined in the TMDL IP have all been completed with deadlines being met. Under the City’s proposed 2011 SWMP submitted with the City’s MS4 permit renewal, efforts for bacteria reduction will move forward by continuing partnership programs with the park and school districts. Programs such as pet/animal waste management,

transient camp clean ups, SSO response, and septic tank inventory and education will continue with project updates, response, monitoring, and tracking.

Mercury:

- M1 - Limit Construction Site Erosion
 - The Land Drainage and Alteration Program (LDAP) staff continues to monitor and work on streamlining the permit process and on new municipal code addressing LDAP code and erosion concerns. This review process is ongoing and will continue as needed.
 - Updates to the Engineering Design Standards and Procedures Manual (EDSPM) for erosion and sediment control were drafted and adopted by City Council.
 - Negotiations with DEQ continued on delegation of authority on DEQ 1200-CN NPDES permitted activities within the City Limits. City Council approved and signed the IGA November 2010 and the DEQ signed in January 2011. Reporting data pertaining to 1200-CN permits is included in Springfield's MS4 Annual Report, dated October 2013.
 - Development Code was adopted that improves restoration requirements and erosion control requirements.
 - The City continues to maintain CESCL certification for two LDAP staff.
 - The LDAP program inspections and compliance continues to provide ESC enforcement and compliance.

- M2 - Enhance Post Construction Support
 - Water Resource staff continues to be active in Development Plan Review, Pre-Development Review, and Pre-Construction meetings.
 - Development Code and design standards were adopted that improve restoration and erosion control requirements.
 - A Water Quality Facility Inventory and Inspection Program has been implemented to ensure the long-term viability of code-mandated water quality facilities in new developments. Program guidance has been drafted, inventory collection and mapping is ongoing, and inspections continue. Post-construction inspections started in July 2010, they occur every year during the summer months starting in July. Inventory mapping occurs just prior to inspections and will be ongoing as new facilities are constructed.
 - Springfield Development and Public Works now has a program that offers reduced SDC's for installing rain gardens or rain water harvesting systems to residential builds. These sites are tracked.

- M3 - Evaluate/Enhance Street Sweeping, Catchbasin, and Pipe Cleaning Programs
 - The review and adaptive management of the street sweeping, catchbasin & pipe maintenance programs, and equipment evaluation and scheduling is an ongoing task. Water Resource staff works with Operations staff to identify program gaps and research new equipment and available technology.
 - Currently, the City has two mechanical sweepers that are concentrated in the residential areas, which are swept about 4-7 times a year. One regenerative air

sweeper is assigned to arterial and collector sweeping. Depending upon traffic patterns, some streets are swept weekly and some every two weeks. Over 3,470 curb miles of routine sweeping took place with an additional 463 hours of sweeping provided for spill response, unscheduled call outs, and accident cleanup. An additional 213 staff hour was spent on litter pick up.

- Catchbasin cleaning is seasonal with a goal of cleaning 80% of the catchbasins yearly. Over 4,916 catchbasins were cleaned.
 - Over 3,273 feet of storm line was cleaned and 164 culverts cleaned. Ditch/Canal cleaning was done on 4.2 miles of system and ditch reshaping was done on over 11,000 ft.
- M4 - Hazardous Waste Control
 - Development and Public Works continues to hold the annual Springfield “Spring Cleanup” event that collects electronics and other waste for recycling and proper disposal. The City continues to be an active member of regional groups that address household hazardous waste roundups. Staff participates in events such as the Lane County Home Show where non-mercury thermometers are distributed. Mercury thermometer trade-in events have been held in the past.
 - Environmental Services staff continues to participate in the Regional “Eco Biz” Program that addresses and promotes mercury “switch out” for automotive electrical switches and promotes recycling with local auto shops. The City’s Fleet Maintenance Facility obtained its Eco-Biz Certification during the last reporting period.
 - Auto shops were visited and technical assistance provided, as part of the City’s Auto Shop Program. Not all Auto Shops can achieve State Eco-Biz status, but may qualify as a “Clean Water Business” through the City program. This program promotes “switch out” for automotive electrical switches, recycling, and proper storage of material.
 - In previous year’s Springfield’s Industrial Pretreatment program provided administration of a dental Pollution Management Program (PMP) in cooperation with the Oregon Dental Association. Site inspections and technical assistance was provided to dental facilities. There were 17 participating dental offices in Springfield committed to following Oregon Dental Association Best Management Practices for responsible disposal of mercury waste. Upon statewide adoption of the requirement to install mercury amalgam separators at dental facilities, the dental PMP program was discontinued in favor of the new statewide requirements. Enforcement and administration of program now rests with the Oregon Dental Board as required under the new rule.
 - A drug take back box for unwanted pharmaceuticals was installed at the City Police Department. Although the drug take back box does not directly affect the

collection of mercury it has been very effective in collecting and removing pharmaceuticals from the waste stream and heightening people's awareness.

- M5 – Public Outreach and Education
 - Continued to revise and update existing education and outreach materials, participated in Clean Water Workshops in elementary and middle schools, channel restoration school projects, Earth Day, Environmental Education field events, Public Works Week, and Career Day.
 - Developed a new factsheet that discuss catchbasin cleaning and City stormwater programs. This factsheet is provided to business to inform them of catchbasin cleaning requirements and the pollutants that are caught in basin sediments.
 - Stormwater runoff and water quality presentations were given to Clubs, Watershed groups, Council, and HOA's.
 - The Clean Water Gardens Program held rain garden workshops and booth events that resulted in the installation of naturescapes, rain gardens, brochures distributed, a rain barrel was given away and native plants given to citizens.
 - A grant proposal was submitted with regional partners to do floodway and channel restoration along a local waterway. Status of the grant is unknown.
 - A grant proposal was submitted by the City but not awarded to Springfield to do tree planting, restoration, and education along the QFW.

The goals and tasks for mercury reduction as outlined in the TMDL IP have all been completed by the deadlines. Under the City's proposed 2011 SWMP submitted with the City's MS4 permit renewal, efforts for mercury reduction will continue with programs and activities such as; providing technical assistance to auto shops, seeking out automotive facilities to become Eco-Biz certified, participation in local or regional programs promoting the trade in of mercury thermometers and compact florescent recycling, Springfield Cleanup, and provision of material to the public about mercury pollution.

Adaptive Management Measures

The Implementation Tracking Matrix includes target dates for the implementation of each of the measures included in this Plan. Where implementation of a particular measure is infeasible or unavoidably delayed, staff will evaluate the cause. Options include adaptively managing to facilitate implementation of the measure, developing an equivalent measure, or working with the DEQ to develop a strategy for accomplishing a similar result using an alternate method or schedule.

There are no adaptive management requests being made for this reporting period.

Implementation Matrix

The following matrix details the strategies that will be implemented within the five years. The matrix displays the pollutant being addressed, the strategy to address it, when that strategy will be implemented, and how to measure progress and successful implementation

Table 2 - TMDL Implementation Tracking Matrix

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	BENCHMARK <i>Intermediate indicators to know progress is being made</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
Temperature	Solar radiation to surface waters	T1 - Inventory Existing and Potential Shade and Enhancement Areas	Develop a priority project list for shading.	Conduct a desktop inventory and assessment process for identifying shade potential sites.	By May, 2009	Prioritization list of potential sites.	100% complete
			Work to develop public/private partnerships for demonstration projects.	Develop a proposal for partnering on shading projects.	By July, 2009	Meet with selected groups and propose partnerships to develop shading projects.	100% complete and ongoing
		T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement	Code review, evaluation and enhancement for parking lot, streetscape shade and riparian vegetation management, setbacks and buffers, and retrofit practices if appropriate.	Review the Development Code with key planning staff, and determine if shading or riparian protection amendments are appropriate.	By May, 2009	Review of Development Code for enhancement of riparian setbacks.	100% complete
				If amendments are appropriate, develop & propose to Council or work to include them in an amendment package.	By December, 2010	Proposals brought to Council.	100% complete
			Mill Race restoration and temperature mitigation.	Continue to fully participate with ACOE staff contacts and meetings.	Participation is on going	Continue to participate with ACOE staff contacts and meetings.	100% complete and ongoing
				Explore additional or alternative funding and project phasing & explore alternative funding options & sources.	Phasing by July, 2009 Funding by Dec., 2009	Development of alternative projects, funding options and source list.	100% complete and ongoing
	Work with the ACOE in identifying discrete project tasks that can advance overall restoration.	Priority tasks list by December, 2009	Development of a priority project tasks list	100% complete			
	Outreach and education to groups, citizens, businesses and industry.	Include discussion of heat as a pollutant into the existing outreach and education program.	By May, 2009	Development & inclusion of temperature management in education materials, presentations, public events & meetings with industry.	100% complete and ongoing		
	Warm water discharges	T3 - Manage Industrial Warm Water Discharges	Work with industrial sources and Oregon DEQ to address warm water discharges thru the NPDES permit program.	Staff will continue to work with industry and State regulators to find acceptable management resolutions.	In process and ongoing until revisions made to industry discharge permits	Acceptable management resolutions and revision made to industry's discharge permits by the DEQ.	100% complete and ongoing
	Public Interaction	T4 - Public Outreach and Education	Develop and distribute outreach and education materials to the public.	Staff will evaluate needs, types of temperature related activities effecting water quality, material options and sources.	In process and ongoing, re-evaluation by January 2010	Staff will continue to work with other agencies and independently in the evaluation, addressing needs and discussions on types of temperature related activities effecting water quality, Staff will continue to develop/distribute material and research options and sources.	100% complete and ongoing

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	BENCHMARK <i>Intermediate indicators to know progress is being made</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
Bacteria	Sanitary sewer system	B1 - Sanitary Sewer Overflows - Work Practices	Review current standard operating procedures for spill response. Amend or revise if appropriate.	Review relevant SOPPs for spills and overflows.	By January, 2009	Review completed	100% complete
				Develop/amended SOPPs, if needed.	By July, 2009	Adoption of new or amended SOPPs if appropriate	100% complete
			Review contractor work provisions to ensure contractors know and understand Spfld. requirements for sanitary spill.	Conduct review of relevant Springfield standard contracting specifications.	By July, 2009	Review of contract specifications	100% complete
				Develop revisions, if needed	By December, 2009	Adoption of new or amended contractor work provisions, if needed	100% complete
	Animal/Pet waste	B2 - Animal/Pet Waste - Program Enhancement	Coordinate with Willamalane Park & Recreation Dist. to identify additional sites for pet waste disposal stations in public area used by pet owners. Assist with placement and maintenance.	Meet with Willamalane & Maint. staff to identify prospective locations for pet waste stations.	By January, 2009	Development of a list of possible locations. Program is ongoing.	100% complete and ongoing
				Coordinate installation of new sites if appropriate locations found.	By July, 2009	Installation completed at sites.	100% complete and ongoing
			Inspect pet parks, kennels, and pet day care sites to ensure proper waste handling.	Identify existing/proposed pet parks, kennels and pet day care facility owners/operators to ensure proper pet waste management.	By August, 2009	List developed of dog park owners, kennels & pet day care facilities. Contact facilities & request inspections for waste management.	100% complete
			Continue pet waste outreach and education work with citizen groups, students, at public events and include targeted businesses.	Identify pet supply stores within Spfld. and promote pet waste management brochure distribution to them.	By July, 2009	A list of Spfld. pet supply stores and facility contact made.	100% complete and ongoing
				Review and update educational material for distribution as needed, and distribute to willing business owners.	By July, 2009	Review and approval of updating current material and the development of new material.	100% complete and ongoing
			Waterfowl and Nutria feeding outreach and education.	Coordinate with Park & Rec and City Maintenance staff to identify area locations of wildlife feeding.	By July, 2009	List developed of locations.	100% complete and ongoing
				Develop educational signs related to feeding wildlife and the impacts on water quality.	By December, 2009	Signs developed and posting started.	100% complete
			Sanitary wastes	B3 - Septic Tank, Transient Camping and Private Sanitary Infrastructure Outreach and Education	Identify septic systems in the City limits; assess feasibility or need for connection to City sanitary sewer.	Initiate a septic system inventory program for the City.	By July, 2009
	Contact owners – gather condition information and interest.	By December, 2009				Contact owners, information gathered	100% complete
	Develop and deliver outreach and educational materials to owners.	by January, 2010				Distribution of outreach and educational material	100% complete and ongoing
	Continue investigations into illicit commercial waste disposal practices.	Continue current efforts, AND develop informational handouts targeting other possible sources.			By January, 2010	Review and approval of updating current material and the development of new materials.	100% complete
	Review transient camping procedures, and focus additional efforts where sanitary waste or other waste impact open waterways. Seek enforcement through existing codes/statutes, as resources allow.	Develop procedures & priority site determination criteria with PD and Maintenance staff.			By December, 2009	Review and development of policies and procedures. Development of a priority list, deterrent option list and a tracking program.	100% complete
		Work with land owners to enforce illegal camping regulations.			By June, 2009		100% complete and ongoing
		Assess known campsites on public land and establish a priority list for removal. Investigate campsite deterrent measures.			By December, 2009		100% complete and ongoing

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	BENCHMARK <i>Intermediate indicators to know progress is being made</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
	Public Interaction	B4 – Public Outreach and Education	Develop and distribute outreach and education materials to the public.	Staff will evaluate needs, types of bacteria related activities effecting water quality, material options and sources.	In process and ongoing, re-evaluation by January 2010	Staff will continue to work with other agencies and independently in the evaluation, addressing needs and discussions on types of bacteria related activities effecting water quality, Staff will continue to develop/distribute material and research options and sources.	100% complete and ongoing
Mercury	Construction site soil erosion	M1 - Limit Construction Site Erosion	Review existing LDAP program, identify any additional program needs & assist with modifications to enhance program effectiveness. Initiate discussions with DEQ staff for Spfld. to receive delegated authority from DEQ on 1200-C NPDES permitting within the City limits	Review program, determine program revisions and enhancements, if appropriate.	By January, 2010	Review and updates made to the current program, if needed.	100% complete
				Draft “MOU” between Springfield and DEQ	By December, 2010	City Council approval of “MOU”	100% complete
		M2 - Enhance Post Construction Support	Continue Water Resources staff participation in plan review & expand reviews by Water Resource staff into more involvement in the approval process.	Expand level of review involvement by engaging in the review process for proposals requiring engineering review.	By January, 2009	Expanded involvement in review development proposals requiring engineering review for water quality impacts.	100% complete and ongoing
			Initiate development of a post-construction BMP inspection program to ensure maintenance of WQ BMPs at private sites.	Identify needs, assess available staff and resources.	By December, 2009	Staff and resource needs assessed.	100% complete
				Pursue program implementation within resource limitations.	By July, 2010	Development of an inspection program, if funding and staffing is determined to be feasible.	100% complete and ongoing
	Urban street runoff	M3 - Evaluate/Enhance Street Sweeping, Catchbasin, and Pipe Cleaning Programs	Review with PW Maintenance staff the current street sweeping, catchbasin & pipe maintenance programs, equipment, schedule, and identify program gaps.	Review existing sweeping and CB and pipe cleaning programs, equipment, technology and complaints with Maintenance staff and develop adaptive management measures as needed.	Annual review May, 2009	Review, approval and implementation of any updates to the current programs.	100% complete & ongoing
	Hazardous waste control	M4 - Hazardous Waste Control	Use household hazardous waste collection events to reduce the improper disposal of items containing mercury.	Springfield will continue to participate in the support of the Lane County household hazardous waste events including outreach at public events such as the Lane County Fair, Springfield cleanup and Earth Day.	Ongoing annually	Participate in Public collection events and promote outreach.	100% complete & ongoing
			Continue the implementation of pollution management practice (PMP) program for local offices designed to address and prevent mercury waste from dental amalgam from entering the wastewater system.	Springfield’s Industrial Pretreatment program will continue the administration of a dental PMP program in cooperation with the Oregon Dental Association.	Ongoing with expected evaluation and site inspection by January 2010	Records are maintained through program and reported as required.	100% complete
Public Interaction	M5 – Public Outreach and Education	Develop and distribute outreach and education materials to the public.	Staff will evaluate needs, types of mercury related activities effecting water quality, material options and sources.	In process and ongoing, re-evaluation by January 2010	Staff will continue to work with other agencies and independently in the evaluation, addressing needs and discussions on types of mercury related activities effecting water quality, Staff will continue to develop/distribute material and research options and sources.	100% complete & ongoing	

