

CITY OF SPRINGFIELD, OREGON

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October 12, 2023

Heather Tugaw
Interim Western Region Watersheds and Stormwater Manager
Oregon Department of Environmental Quality
221 Stewart Avenue, Suite 201
Medford, OR 97501

RE: City of Springfield's 14th Year TMDL Annual Report for Fiscal Year 2023

Dear Heather Tugaw,

Enclosed, please find the City of Springfield's 14th Year Annual Report for our TMDL Implementation Plan (updated in 2022). This report includes a summary of our implementation efforts for the reporting period of July 1, 2022 through June 30, 2023. It also outlines the City's progress toward full implementation of the plan.

Springfield anticipates continuing our efforts to comply with our approved TMDL Implementation Plan through the next reporting period. No adaptive management amendments are requested as a part of this annual report. Springfield has included a matrix that describes our MS4 General Permit Control Measures and our progress in completing them in response to the Willamette Basin Mercury Basin Updates.

Our MS4 Plan was approved by DEQ on April 7, 2023.

We look forward to your review and response.

Sincerely,

Niel Laudati
Assistant City Manager
City of Springfield
225 Fifth Street
Springfield, OR 97477

Enclosures: Springfield's FY23 TMDL Annual Report
Springfield's FY23 MS4 General Permit Annual Report with attachments

CC: Priscilla Woolverton, Upper Willamette TMDL Basin Coordinator Western
Region, DEQ

Matt Stouder, Environmental Services Division Director, City of Springfield
MS4 Stormwater Program Coordinator, DEQ
ESD electronic file, City of Springfield

City of Springfield

TMDL Implementation Plan 14th Year Annual Report 22-23



Horace Planter 2020

Submitted October 2023 for July 1, 2022 through June 30, 2023



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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 June 2019, accepted by the Oregon Department of Environmental Quality (DEQ) June 19, 2019, 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.

Under its first TMDL, Springfield was required to perform a 5 Year Review Report and submit another 5-year plan to the DEQ by April of 2014. The City drafted and submitted its 2014 TMDL IP and 5 Year Review to the DEQ in March of 2014. The DEQ determined that since Springfield had just submitted the 5 Year Review and its new Plan that it was not necessary to submit an additional Annual Report in 2014. The sixth annual report was submitted in October of 2015, the seventh report in September 2016, the eighth report in October 2017, the ninth report in October 2018, and the tenth was a 5 Year Review Report submitted August of 2019.

For our current TMDL IP, the eleventh Annual Report was submitted in October 2020, the twelfth was submitted October 2021, and the thirteenth was submitted in October of 2022. This Annual Report is Springfield's fourteenth report and covers the time frame from July 1, 2022 to June 30, 2023. The report is due to the Oregon DEQ by November 1st, 2023.

Springfield was issued its Municipal Separate Storm Sewer System (MS4) General Permit on June 1, 2021. TMDL pollutants and their waste load allocations (WLA) and load allocations (LA) are part of the MS4 permit's best management practices (BMPs) for pollution reduction by using qualitative or quantitative benchmarks. Springfield's 2019 TMDL IP was incorporated into the proposed General Permit Stormwater Management Plan (MS4 Plan) that was approved by DEQ on April 7, 2023. Springfield will continue to submit copies of the TMDL Annual Reports covering the time frame from July 1st to June 30th of each year to the MS4 Stormwater Coordinator. This dual reporting will continue until Springfield is advised otherwise.

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. Springfield’s public stormwater drainage system discharges to both of these rivers.

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. In January 2022, Springfield updated its 2019 TMDL IP to incorporate requirements of the U.S. Environmental Protection Agency (EPA) release of the Total Maximum Daily Load (TMDL) for Mercury in the Willamette Basin, Oregon on February 4, 2021.

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 2019 TMDL Implementation Plan and its measurable 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 (Table 1) will provide information about each strategy, implementation methods, and progress or status in meeting the plan’s goals. Table 1 was updated after September 14, 2022 to incorporate the revised 2019 TMDL IP goals and tasks for mercury and for reporting.

While the Implementation Schedule presented in the Implementation Tracking Matrix is realistic, unforeseeable events can and do occur; budget shortfalls, staffing limitations, natural disasters, global pandemics, and changing priorities can impact the rate or success of implementation.

Springfield was issued its MS4 Phase 2 General Permit June 1, 2021, and will have until February 28, 2024, to implement all required components of the permit.

Springfield's general permit stormwater management plan (MS4 Plan), which identifies measurable goals and timelines, was approved by the DEQ on April 7, 2023. Specific sections of Table 1 relating to Non-Point Source Stormwater Runoff – MS4 General Permit Control Measures, identify general permit measurable goals in addition to our 2019 TMDL IP current goal status. Table 1 will be updated with reporting status as implementation occurs (with annual reporting).

The City is continuing to implement existing programs and further projects and goals under the 2019 TMDL IP. Some current projects and programs the City undertakes do not have a listed goal or directly related task. Therefore, the City is including additional tasks relevant to addressing the City's WLA for temperature, bacteria, and mercury.

Some of the current programs and projects that are being implemented under the City's MS4 General Permit for illicit discharge, SSO response, code reviews, post-construction management, assessments, construction site runoff, public involvement, and public education and outreach, may change direction or be eliminated as we work through implementation of the General Permit. These changes, if any, will be implemented through the Adaptive Management process and submitted to the DEQ TMDL Basin Coordinator upon development.

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 1 TMDL Implementation Tracking Matrix for completion status.

Temperature:

- T1 - Inventory Existing and Potential Shade and Enhancement Areas
 1. Maintain priority project list; review and update.
 2. Continue to work to develop partnerships; continue to explore options.
 3. Review natural resource inventories and identify needs.

Summary:

- 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 and is incorporated into the City CIP process. A review of the assessment and list was completed January 2017 and reported in a previous annual report. Updated Canopy Shade Assessment document and identified next steps for completing a desk-top and field assessment. Identified new areas based on UGB expansion and wetland/riparian inventory. Both of these documents were reviewed and updated in 2021 and 2023. Ongoing work continues with the LWI and WHA updates in the UGB expansion areas.

- Continued work shade planting near waterways. The City staff planted River Glen Swale, and also the bank of Jasper Slough with trees and shrubs (in partnership with Willamalane). Staff helped promote other Willamalane planting events by emailing the Stream Team.
- 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. This project is in the O&M stage with ongoing maintenance and vegetation monitoring. In July 2022, Operations cleared around 20 acres of invasive plants this reporting cycle.
- A stormwater treatment park along the north bank of the Mill Race has been completed. This facility also provides education via signage and a trail system. The treatment park enhanced this area greatly by converting an open industrial area full of invasive plants into a natural vegetated and treed facility. Additionally, providing pre-treatment and cooling of industrial and stormwater runoff before it enters the Mill Race. The multi-use path along the Mill Race and Stormwater Treatment Park is completed. This trail system runs along the top of bank of the Mill Race and begins at the treatment park; it too had native vegetation and trees added in place of the invasive species removed. This project is in the O&M stage with ongoing maintenance and vegetation monitoring.
- Starting in FY21, in the newly expanded UGB areas, wetlands, riparian areas, and wildlife habitat was identified and assessed to determine local significance. This project is supported, in part, by grant funds. Work is in the review and finalization stage. In FY21, the local wetlands inventory was submitted to DSL for their initial review; in FY23, a revised local wetlands inventory was submitted to DSL, and we are awaiting their second review. Elected and appointed officials confirmed that Springfield will follow the Standard approach for protections.
- Staff continued to work with the Long Tom Watershed Council and other agencies in the Urban Waters & Wildlife Partnership and has since expanded its efforts to include additional partners such as SUB and EWEB. This partnership focuses on voluntary private stormwater retrofits and enhancements. Work on drafting agreements and grant submittals took place this reporting period. The group finished drafting and signing a Memo of Understanding (MOU) and submitted and was awarded an EPA grant.
- Just outside the City Limits, but in the Urban Growth Boundary, the City participated in the review process of the Georgia Pacific Master Plan. This plan was also adopted by the City in November 2021. The plan calls for the retainment of open space and trees. In August 2021, the City and Willamalane staff conducted a site visit to glean visual understanding of impacts of equestrian use on trails and waterbodies near the property. The City, Willamalane, and

Springfield Utility Board entered into a new long-term IGA in the spring of 2023 for the operation of the property.

- T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement
 1. Additional review of Development Code for parking lot, streetscape, vegetation management, setbacks and buffers, and retrofit practices; review development code and amend if appropriate.
 2. Mill Race restoration management and enhancement; continue to identify discrete projects that can advance overall restoration.

Summary:

- The major review of the Springfield Development Code to include new technology, designs, and ideas for improving water quality was completed under the first TMDL Plan. Low Impact Development Approaches, Engineering Design Standards, and the Development Code continue to be reviewed and improved upon to optimize shading, address pervious pavements, and stormwater discharge alternatives. A review of existing codes and standards pertaining to riparian areas, parking lots, and streetscapes was conducted in February and March of 2021 and again in 2023 and were found to be acceptable and in compliance at this time. Also, in FY22 and FY23, staff reviewed post-construction development code and standards in order to meet the conditions of the MS4 General Permit for retention and water quality. These code updates are required to be in place by February 28, 2024, and are slated to go to City Council in November 2023. The proposed MS4 Plan sets a schedule for updates.
- Since January 2021 there has been a code/review and update effort for housing and land use planning, as well as some Glenwood development code adjustments. Some stormwater codes are being looked at in those processes as well. MS4 General Permit language is being reviewed at the same time to incorporate any needed language changes.
- Staff continues to work with developers, through the development review process, on providing large canopy trees, maximizing vegetative treatment and/or incorporating additional vegetation into planned project sites, when appropriate.
- A new streetscape project called the Virginia Daisy Bikeway is currently in phase 2; design work and phase 1 was completed during last reporting period. This project incorporated a skinny green street design with trees, swales, and a bike path.
- Laura Street is in the design phase – includes stormwater improvements and improvements for Channel 6. Construction to start in 2024/5.
- Mill Street is in the design phase – includes stormwater tree wells.
- Pierce Channel was enhanced through the Public Improvement Process for the Marcola Meadows development.
- As mentioned above, the Mill Race Restoration Project is in the O&M stage with ongoing maintenance and vegetation monitoring. Over 20 acres of invasive plants were cleared.

- In February 2021 and May 2023, updated the Mill Race Restoration Project List - “Project Wish List” for areas along the MR that can benefit from shade and vegetation enhancement projects. Gathered input from Engineering, Operations, and Willamalane.
 - Phase 1 of the Franklin Boulevard Redevelopment Project was completed in 2018. This redevelopment included re-landscaping an industrial corridor with vegetated round-a-bouts, vegetated park strips and medians with trees, and water quality facilities in and along the corridor. It includes three large infiltration swales, numerous other smaller street side infiltration swales, and pervious pavement. Phase 2 is funded. Design will resume soon and will be constructed. This will be the roundabout at Mississippi and Franklin.
- T3 - Manage Industrial Warm Water Discharges
 1. Identify industries with stormwater discharges and provide technical assistance to reduce warmwater discharges and improve stormwater treatment where opportunities exist.

Summary:

 - Staff continues to review 1200z permits and Pollution Control Plans for industries in Springfield’s jurisdiction when they become renewed or issued; there was one renewed 1200z permit that was reviewed during this reporting period. Staff reviewed and updated our tracking database for the 22 industries with 1200z permits that are in our jurisdiction. A best management practices letter was drafted.
 - Industrial sites with structural stormwater controls are inspected as part of the Water Quality Facility Management program, with requirements for maintenance, vegetative coverage, etc. See Mercury M2 section for details.
 - Staff completed an assessment of industrial and commercial sites in 2017-2018; over 600 businesses within the UGB were identified and ranked based on a list of criteria which influence the site’s potential to pollute. During this reporting period staff continued with updating the list and reviewing outreach options.
 - 27 BMP postcards were sent to storage facilities and 8 BMP postcards were mailed to asphalt/paving companies.
 - Under the first TMDL IP, 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. Outreach material goes through an annual review process, the intention of the review is to ensure they are up-to-date and provide the target audience with the best management practices for warm and/or polluted water. During FY23, BMP postcards were mailed to 14 pressure washing companies, 28 letters were mailed to pressure

washing companies, and 10 pressure washing brochures were distributed at local stores.

- T4 – Public Outreach and Education

1. Continue to review, develop, and distribute outreach and education materials to the public as needed.

Summary:

- Staff continues to revise and update existing education and outreach materials and participate in clean water classes in schools and community events such as: Clean Water University, Earth Day, Public Works Week, and the Lane County Home Show. This year, staff created a Springfield H2Oh! exhibit at the Springfield Museum that illustrated the drinking water, wastewater, and stormwater systems in Springfield and their differences.
- A Clean Water Garden booklet series that focuses on water harvesting, stream side gardening and riparian planting continues to be popular for homeowners and residents. Information on temperature as a pollutant and canopy tree planting is included in the material. The booklet series continued to be distributed in stores. In FY23, the booklet series was redesigned into trifold brochures. A new native plant brochure was created in place of the Streamside Gardening booklet because most properties in Springfield are not along streams. This new trifold includes native trees and shrubs. No streamside gardening booklets went out to the public at distribution sites in FY23, but the booklet is still available on the City's website.
- IDDE response, educational outreach, and enforcement continued in response to temperature related discharges, vegetation removal, and yard debris dumping.
- School workshops continue to include temperature as a pollutant discussion and the importance of tree shading along banks of streams. Staff redesigned the Clean Water University program in 2018 and now includes Eugene's 4J and Bethel school districts. During FY21, staff developed a virtual class. During this reporting cycle, virtual classes were an option and 600 5th graders attended the in-person event at the Wastewater Treatment Plant in Eugene.
- As mentioned above, staff chose to use social media much more this year and was able to cover multiple subjects even bringing in a couple new topics such as pesticides, ice control, moss control, difference between wastewater and stormwater, and rain gardens.
- The Mill Race interpretive signs along the path continue to be maintained and provide educational information to the public.
- The pollution prevention educational portfolios were updated and restocked. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address warm water as a pollutant.

- 203 door hangers went out to various sites addressing pollution loading in certain areas. Some of these area and door hangers were to bring attention to the dumping of yard waste along waterways and vegetation loss.
- Car washing water not only contains warm water but also soaps, chemicals, and oils. In FY23, one kit was loaned out.
- The Water Quality Facility Management Program provides outreach and educational information with every condition report. Staff stresses the importance of a canopy and shrub coverage in water quality facilities. In FY23, 179 O&M reminder postcards were mailed out.
- The City's UpStream Art project had its seventh successful year. Advertisements, media spots, social media feeds, and staff interview all provided an opportunity to discuss stormwater pollution; the art as well sends a message out daily. It was highly publicized on our website and a virtual tour and story map showcases the sites.
- The City along with regional partners started a zinc study and education project. This project will focus on sources of zinc and identify educational opportunities. Zinc is mostly used by the general public to control moss. Too much vegetation and/or vegetation in the wrong place can promote moss growth causing the overuse of control agents. This project will include public education about how to prevent moss growth and also stormwater-friendly ways to remove it. The U of O student project concluded in June 2022 with a presentation on their findings.
- Under the MS4 Phase 2 General Permit there is a requirement to assess one education and outreach activity per year and include that assessment in the MS4 Annual Report. The assessment of one activity occurred in July of 2023, see Springfield's MS4 Annual Report for that assessment.
- The March 2023 utility bill insert showcased the Mill Race, riparian plantings, and encouraged residents to connect with this historic waterway. Over 34,000 copies of the brochure went out in bills and digitally.
- The annual 'Canines for Clean Water' calendar featured education about native plants, BMPs for washing, and more tips on ways to keep our streams cool for wildlife (July's tips).

The goals and tasks for temperature reduction as outlined in the 2019 TMDL IP are all on track.

Bacteria:

- B1 - Sanitary Sewer Overflows (SSO) - Work Practices
 1. Review current standard operating procedures for spill response: amend as necessary.
 2. Review relevant Springfield standard contracting specifications; amend as necessary.

Summary:

- SOPPs related to SSO procedures and protocols, and contractor provisions were reviewed with minor updates made in April 2021. The City continues to evaluate and adaptively manage its procedures and policies as needed, coordinating efforts with the other Development and Public Works divisional staff. In January 2022 three relevant SOPPs were updated and one discontinued.
 - 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 continued to be provided with information for proper reporting as part of the contractor provisions. A review was completed in 2021 that did not identify any needed changes.
 - IDDE and Operations staff continue to respond and address bacteria related discharges as they are identified. Staff responded to one public SSOs in FY23.
- B2 - Animal/Pet Waste - Program Enhancement
 1. Continue to work with local partners to identify locations for pet waste stations; install and maintain stations.
 2. Continue to identify pet care providers and services and identify outreach opportunities; update facility list and continue to distribute educational materials.
 3. Continue pet waste education and public events; identify options for material distribution, hold events, and update material as needed.
 4. Wildlife feeding outreach and education; continue to identify locations, appropriate outreach methods, track distribution, and explore options of a wildlife feeding ordinance.

Summary:

- During this reporting period, discussions with Willamalane Parks and Recreation District, Springfield School District19, and City Operations Division staff identified additional locations for pet waste stations or bag dispensers. Stations and dispensers continue to be installed as locations are identified. In FY23, one new station was installed at Centennial Elementary. City staff provided one pet waste station to the school district, and two stations to Willamalane. A total of 8,000 bags were distributed by city staff during FY23. 4,000 bags were provided to the school district for use in their pet waste stations. Staff and partners continue to monitor existing stations, replenish bags, and evaluate new locations. Station locations and O&M of stations are tracked in the PEO App.
- In previous years, pet parks, kennels, pet supply stores, and pet daycare facilities have been identified and outreach material developed. City staff continues to work with facilities on waste handling and problem areas as needed. Staff updated

the pet service providers list in FY22. BMP postcard mailings went out to 11 pet care service providers, and 22 letters were mailed to pet care providers.

- Pet supply stores have been identified and outreach material developed and continues to be distributed in stores. Educational material continues to be monitored, stocked, updated, and replaced as needed. 123 Canines for Clean Water brochures were distributed during this reporting period as part of the routine distribution, and 24 were picked up at the home show.
 - Pet waste management education at public events is ongoing as is the City's participation with regional outreach groups. Staff continues to participate in public events such as the Lane County Home Show and Willamalane's Pet Fest. In FY23, staff was able to participate in seven events: Lane County Home Show, Clean Water University, Public Works Week, a water exhibit at the Springfield Museum, Earth Day poster contest, Spring Clean Up, and Pet Fest. All other outreach was either done virtually or through social media.
 - The "Canines for Clean Water" program continues to be a success. Springfield residents submitted photos for the 2023 contest and pledged to pick up after their pet. The 2024 calendar contest drew 219 pledges and photo submissions. The contest was promoted through social media. 4,000 2023 Canines for Clean Water calendars were distributed at local pet supply stores and other locations in FY23.
 - One public booth event was held during the reporting period (Pet Fest). Additionally, 187 bag holders, 215 bandanas, 6 business signs, and 40 yard signs were distributed to the public.
 - Springfield residents continue to pledge to scoop the poop (149 total Springfield resident pledges = Pet Fest + online submissions).
 - 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 were developed under the last TMDL Plan and continue to be installed at problem locations to deter animal feeding; 10 signs were given to Willamalane to put up at their parks in FY23. Staff re-explored the development of a wildlife ordinance February 2022. It was decided that education and outreach should remain the primary tool for encouraging the desired behavior.
- B3 - Septic Tank, Transient Camping & Private Sanitary Infrastructure Outreach & Edu
 1. Maintain septic tank inventory program; maintain inventory, update educational materials, and work with property owners to provide sanitary services where needed.
 2. Continue investigation into sanitary waste disposal practices; continue to identify targeted audiences.
 3. Review transient camping procedures; update as needed, work with property owners, and assess known sites.

Summary:

- The septic tank inventory within the City limits is complete; sites continue to be added to the inventory when discovered or removed when connected to the City sewer system. The septic system inventory is now accessible via the City's mapping application (MapSpring).
- During FY23, seven septic systems were decommissioned and connected to the City sewer system.
- In FY23, we updated our septic system maintenance guide as well as two postcards – one for septic owners and one for renters on septic. We mailed out 206 brochures to septic owners in the City Limits. We mailed 2,183 postcards to septic owners in the UTZ, and 1,723 renter postcards to those in the UTZ and in the City Limits. We provided 140 brochures to Lane County onsite wastewater. The brochure is available on our website and at the City's building permit counter.
- Design work for the phase 2 project of Franklin Blvd. is in the works and will have the potential to greatly reduce septic systems along Franklin Blvd. as a sanitary sewer extension will be part of the process.
- Other sewer extension and rehab project updates for FY23::
 - S 28th Street = completed October 2022, 1363' of new sanitary sewer
 - 42nd to 48th Street Rehab = completed October of 2022, 4455' sanitary sewer rehabilitated
 - Jasper Trunk Sewer Phase 3 = design in progress
 - S 37th Street, S 38th Street, Osage Street, Janus Street = construction in progress, 2652' new sanitary sewer line
 - Mill Street Rehab = design in progress
 - 70th and 72nd Rehab= design in progress
 - 16th Sewer Repair = design in progress
- The assessment of commercial bacteria waste was completed in a previous reporting period; it was reviewed and updated in FY20 and FY23. Five potential bacteria sources have been identified and four lists were updated. 28 mailers with BMPs and IDDE code were mailed out to these businesses in FY23 (aquarium/pet supply stores, drain cleaners, equestrian facilities, meat and poultry processors, and sanitary waste disposal and hauling).
- A list of known chronic transient camping sites has been developed and continues to be updated and sites monitored. Sites that have a negative impact on health and/or water quality are cleaned up first, on a priority basis as funding allows. 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. During this reporting period there were 2 sweeps and 23 camps were cleaned by City Operations. Staff continued to report camps found near waterways via an app.

- B4 – Public Outreach and Education

1. Continue to review, develop, and distribute outreach and education materials to the public as needed.

Summary:

- Staff continues to revise and update existing education and outreach materials pertaining to bacteria. Implementation of a “Canines for Clean Water” program has proven to be a good way to spread the message and well-received by the public. It will continue to be an active program within budget and staffing constraints. See B2 above for additional information on the program. Additionally, social media was used much more as an outreach method then in the past. Some projects are mentioned below.
- Pet supply stores have been identified as outreach distribution sites and will continue to be stocked with materials. The pet waste management brochure was updated in FY23. 123 brochures were taken at local distribution sites, and 24 were taken at the home show.
- Clean Water University provides hands-on education about water quality and ways to prevent bacterial pollution such as picking up after pets – see above for details.
- The City’s Little Litter Campaign is ongoing; seven signs were installed at various locations. This campaign focus on the small such as cigarettes butts, gum, wrappers, food, cans and bottles, plastic, disposable diapers, wipes, etc. Another sweeper wrap will be installed in FY24. The slogan for the wrap is: *Clean street, clean river; let’s trash little litter.*
- Outreach events for FY 23 included Springfield’s H2Oh! exhibit at the museum (including Fright Night), Earth Day poster contest, Pet Fest, Spring Clean Up, Public Works Week, Springfield Block Party, and the Pollution Prevention Coalition’s booth at the Lane County Home Show. At these events, 137 pens, 70 pencils, 200 frisbees, and 200 stickers were taken by the public.
- The pollution prevention educational portfolios were maintained. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address bacteria from pets and wildlife as a pollutant.
- The IDDE response staff continues to hand out factsheets about bacteria from sources such as pet waste.

The goals and tasks for bacteria reduction as outlined in the 2019 TMDL IP are all on track.

Mercury:

- M1 - Limit Construction Site Erosion

1. Continue to review and update the LDAP Program as needed.

Summary:

- The Land Drainage and Alteration Program (LDAP) staff continues to monitor and work on streamlining the permit process. A compliance review of the LDAP Program was completed in FY22. The review compared existing program elements to the Modified General Permit and identified gaps. The TMDL Plan calls out a benchmark for updates by July 2022, if needed, but since the MS4 General Permit also will require LDAP program and Erosion Code updates it was decided that holding off and doing all the Code updates per the MS4 Plan schedule was the best option.
 - Springfield continues to implement a program that is in accordance with NPDES guidelines within the City Limits. Reporting data pertaining to permits is included in Springfield's MS4 Annual Report dated October 2023. During FY23 630 inspections were completed. Sites requiring 1200-C coverage are referred to Oregon DEQ.
 - Staff continues to post and distribute as needed related education and outreach materials on the City webpage. In FY23, the LDAP webpage was updated, a newsletter was created and distributed via email and at the building permit counter, a list of contractors/developers was generated, fact sheets were updated (to be completed in FY24), and a slide was developed and posted on the TV at the building permit counter.
 - The City continues to maintain CESCL certification for two LDAP staff and has additional staff in Water Resources, Operations, and Engineering that maintains certification.
 - LDAP program inspection and compliance continues to provide erosion and sediment control enforcement and compliance. 214 Permits Issued, 630 Inspections Performed = 97% - one site was out of compliance, and no enforcement actions were taken.
- M2 - Enhance Post Construction Support
 1. Continue Water Resources staff participation in plan review process.
 2. Continue to implement a private post-construction program.

Summary:

- Water Resource staff continues to be active in Development Plan Review, Pre-Development Review, and Pre-Construction meetings and process.
- A Water Quality Facility Inventory and Inspection Program to ensure long-term O&M of facilities is ongoing. Inventory mapping occurs just prior to inspections and is ongoing as new facilities are constructed or identified. In FY23, 110 new facilities were inventoried and 631 facilities inspected or re-inspected (vegetated and structural). 364 initial inspections with 137 found in non-compliance (vegetated and structural). 179 WQF maintenance reminder postcards were mailed out.

- In FY23, there were 79 public water quality structural facility inspections. These facilities are cleaned and inspected by Operations staff.
 - Water Resource staff currently participates in major infrastructure and Code update projects; currently staff is working through post-construction code updates that meet the MS4 permit requirements. Updates expected to take place in FY24.
 - Water Resource staff continued to map and track the presence of wellhead protection signs at locations that have water quality treatment and signage requirements; this is done as part of the Water Quality Facility Management Program, and wellhead protection signage tracking.
- M3 - Street Sweeping, Catch Basin, and Pipe Cleaning Programs
 1. Continue to implement current programs for sweeping, basin cleaning, and storm drainage pipe cleaning; adaptively manage program practices and standards.

Summary:

- Currently, three (3) FTEs and three (3) sweepers are budgeted to sweep the 370 curb miles (cm) of City streets. One mechanical Elgin Broom Bears sweeper is scheduled to sweep the residential streets seven times a year. Two (Schwartz and TYMCO) vacuum sweepers are scheduled to sweep arterials/collectors 22 times per year. Depending upon traffic patterns, some streets are swept weekly and others every two weeks. Over 4,384 cm of routine sweeping took place in FY23.
 - In FY23, 1490 catch basins were cleaned with 92.3 tons of material removed. This currently works out to be 23.7% of publicly owned and operated basins. As development occurs the total owned and operated changes (there were 6, 275 total catch basins in FY23 vs. 5,355 in FY22) due to the addition of new catch basins in newly developed areas.
 - Over 320 feet of storm line was cleaned and 2877 ft. of ditch/channel cleaning and reshaping took place.
 - The leaf pickup program continued in FY23.
- M4 - Hazardous Waste Control
 1. Identify sources of mercury pollution and determine what type of projects can be implemented. Review and update the source assessment.
 2. Use household waste collection events to encourage proper disposal of items containing mercury.

Summary:

- Staff continued to research sources of mercury and mercury pollution and what household products, electronics, and appliances may contain mercury. In FY23, a mercury source assessment was completed.
- In FY23, Spring Clean Up was held as well as the Lane County Home Show. Both events promote proper recycling of mercury containing materials.

- ESD staff continues to participate in the Regional “Eco Biz” Program that addresses and promotes recycling and spill control with local auto shops. The City’s Fleet Maintenance Facility continues to maintain its Eco-Biz Certification. In FY23, 114 mailers went out to auto shops and car washes promoting best management practices and the EcoBiz program.
 - Not all auto shops can achieve State Eco-Biz status but may qualify as a “Clean Water Business (CWBiz)” through the City program. Both programs promote recycling, and proper storage of hazardous material. In FY23, 97 letters and 48 postcards went out to auto shops and 17 letters and 8 postcards were mailed to car wash facilities in Springfield’s jurisdiction.
 - The City of Springfield continues to monitor implementation of Best Management Practices for dental offices and installation of amalgam separators per the requirements of 40 CFR Part 441 - Effluent Limitations Guidelines and Standards for the Dental Category. This ongoing effort includes identifying and tracking of new and existing sources from dental dischargers and limit the discharge of mercury and silver bearing wastes into the regional wastewater collection system.
 - Dental facilities that commenced discharge after promulgation of the rule or have undergone a change of ownership are considered new sources and are required by the rule to submit a one-time compliance report within 90 days. The City of Springfield retains these certifications in accordance with the standard records retention protocol for the national pretreatment program.
- M5 – Public Outreach and Education
 1. Continue to review, develop, and distribute outreach and education materials to the public as needed.

Summary:

- In FY23, 7 household hazardous waste handouts and 2 mercury brochures were taken at the Springfield H2Oh! exhibit and the home show, and 24 digital thermometers were taken.
- Staff continued to revise and update existing education and outreach materials. The LDAP Program erosion and sediment control factsheets are posted to the City webpage.
- The pollution prevention educational portfolios were maintained. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address auto fluids as a pollutant, and sediment control.
- Illicit discharge continues to be enforced. Electronics that are dumped are collected and taken to a local electronics recycler for proper disposal. IDDE response always includes educational outreach when appropriate.
- The water quality facility management program continues to be implemented. Mercury and other heavy metals bind to sediment; having routine inspections and

maintenance of facilities cleans out potential contaminated sediment. Postcards are sent out every year reminding owners to maintain their facilities; proper O&M ensured healthy and fully vegetated facilities.

- The City's UpStream Art project had its seventh successful year. Advertisements, media spots, social media feeds, and staff interview all provided an opportunity to discuss stormwater pollution; the art as well sends a message out daily.

Non-point Source Stormwater Runoff – MS4 General Permit Control Measures

- **Public Education and Outreach**

PE1 - Public Education and Outreach Strategy (PEOS)

PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts

Summary:

- Springfield's Public Education and Outreach program has been implemented since 2007. We have active programs addressing bacteria, temperature, mercury, and general stormwater pollution prevention. We offer brochures, factsheets, booklets, public events, post stormwater pollution prevention tips on social media, and have a publicly accessible website with our outreach material(s). We have programs that address the listed target audiences in section A.3.a.iv. We implement at least two educational messages per year. Some of our largest programs are Canines for Clean Water, Pet Waste Stations, Clean Water Gardens, Clean Water Business, Clean Water University, UpStream Art, Septic System Maintenance, and Little Litter. We either host or participate in regional events such as Earth Day, Public Works Week, and home and garden shows, where educational materials are handed out and the public is engaged in conversation. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, a public education and outreach strategy, updated Council and the public on stormwater pollution prevention, renewed our IGA with Lane County, and completed an assessment of one educational activity (Earth Day Poster Contest for FY23).

- **Public Involvement and Participation**

PI1 – Public Involvement and Participation/Access

PI2 – Public Involvement and Participation Stewardship/Reporting

Summary:

- Springfield's Public Involvement and Participation program has been implemented since 2007. We have active stewardship activities, a public process for SWMP and TMDL development, public process through Council and Springfield Planning Commission, and a website for both information and feedback. Codes, plans, and planning documents are also posted on the website and available for comment when relevant. We are on track in meeting our

proposed MS4 Plan goals and timelines and have completed compliance reviews, maintained access and updated our public website, partnered on stewardship opportunities, and continued to comply with public notice laws.

- Illicit Discharge Detection and Elimination

- ID1 – Illicit Discharge Ordinance, Response, Enforcement, and Tracking

- ID2 – MS4 Map

- ID3 – Dry Weather Screening Program

- ID4 – Non-Stormwater Discharge Assessment

- Summary:

- Springfield has had an active IDDE Program since coverage under the NPDES Individual permit. We have IDDE staff, code, a reporting and response process, a detection process, incident tracking and mapping, and an inspection and enforcement matrix. Our program is documented and has guidance manuals and SOPPs for implementation. Our program focuses on education before citation. We have educational material available in hard copy and on our website as well as online reporting of illicit discharges and stormwater pollution. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, continued to implement existing IDDE response and enforcement program, reviewed our IDDE code and adopted revisions in FY23, reviewed our IDDE program and SOPPs and updated them as needed, reviewed our mapping and inventories and identified gaps and completed most of the needed updates. We have a dry-weather screening program, and have identified MS4 outfalls, developed a Pollutant Parameter Action Level list, and have identified priority point locations. We reviewed and updated both the Non-Stormwater Discharge Assessment Report and the Product Assessment in FY22.

- Construction Sites Runoff Control

- CSW1 -- Erosion and Sediment Control Regulations

- CSW2 – Land Drainage Alteration Permit (LDAP) Program and Plan Review

- CSW3 – Inspections and Enforcement

- CSW4 – City Staff Erosion Control Training

- Summary:

- Springfield has had an active Construction Site Runoff Control Program since coverage under the NPDES Individual permit in 2007. We have ESC staff, ESC code, a reporting and response process, site inspections, ESC plan review process, and an enforcement matrix. Our program is documented and has guidance manuals and SOPPs for implementation. We have contractor educational material available in hard copy and on our website. We believe that we are meeting the current MS4 General Permit conditions. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, continued

to implement existing Erosion and Sediment Control program, reviewed our current code and identified updates, and reviewed our LDAP program inspection and documentation process. Springfield Municipal Code updates are slated for adoption in FY24.

- Post-Construction Site Runoff for New Development and Redevelopment
 - DS1 – Post Construction Stormwater Management Code and Standards
 - DS2 – Post Construction Stormwater Facility Long-Term Operation and Maintenance
 - DS3 – Post Construction Stormwater Management Training, Tracking, and Assessment

Summary:

- Springfield has had a Post-Construction Program since coverage under the NPDES Individual permit. We have engineering, planning, and inspection staff, post-construction code, treatment standards, a design manual, a tracking system for development and inventory, site inspection and enforcement, and a plan review process. We have had a Water Quality Facility Management Program for both public and private facilities in place since 2010 that provides education and enforcement of water quality maintenance. This program is documented and has guidance manuals for implementation. We have facility owner/maintainer educational material available in hard copy and on our website. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, continued to implement existing codes and standards, reviewed and made program improvement to the WQF Program, reviewed and identified needed code and standard updates, completed program reviews, and maintained public stormwater controls. Springfield Development Code updates are slated for adoption in FY24.

- MCM6 Pollution Prevention and Good Housekeeping for Municipal Operations
 - OM1 – Routine Maintenance Operations for Water Quality
 - OM2 – Pollution Control Manuals and Guidelines for City Operations
 - OM3 – Municipal Operations Training, Tracking, and Assessment

Summary:

- Springfield has been implementing best management practices and good housekeeping for pollution prevention since coverage under the Individual Permit. Pollution control guidance manuals and SOPPs have been developed as well as site house-keeping guidance manuals. An assessment was conducted to determine if there was a requirement to have coverage under the 1200z permit. Routine sweeping, catch basin cleaning, litter control, and water quality facility and stormwater control maintenance are all completed by the City

annually. In FY23, a maintenance strategy for stormwater controls was completed.

- In FY23, the Spill Prevention, Control, and Countermeasures Plan (SPCC) for the fuel facility was updated, as well as the Stormwater Pollution Control Plan (SWPCP) for the Operations complex and our wash rack inspection guidance manual.

The goals and tasks for mercury reduction as outlined in the 2019 TMDL IP are all on track.

Adaptive Management Measures

The Implementation Tracking Matrix, below, 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.

Summary of Springfield's response to the 2019 Revised Willamette Basin TMDL for Mercury:

- On December 30, 2019, EPA established the Willamette Basin Mercury TMDL, which was in effect until EPA released the revised TMDL on February 4, 2021. EPA's 2019 TMDL, as revised in February 2021, and DEQ's 2019 TMDL WQMP are in effect and apply to the City of Springfield.
- The City of Springfield is required under OAR 340-42-080 to prepare a TMDL implementation plan to incorporate implementation requirements in the WQMP based on several criteria. TMDL implementation plans must be submitted to DEQ for review and approval by September 3, 2022, which is 18 months from the notification date of March 3, 2021. Springfield submitted a response to the DEQ in June of 2021 providing detailed information on how Springfield meets or will be meeting the revised mercury TMDL elements and planned updates to Springfield's 2019 TMDL Implementation Plan. The DEQ responded with approval of next steps and process in July of 2021.
- Springfield submitted an updated 2019 TMDL Implementation Plan in June of 2022; the DEQ approved the new plan via an approval letter on September 14, 2022.

Implementation Matrix

The following matrix details the strategies that will be implemented within the five-year cycle. 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 1 – 2019 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>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</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	Task 1 - Maintain a priority project list for riparian/channel enhancement projects.	Engineering Division Water Resources Division	Review the existing inventory identifying potential sites.	By April 2021 – 1 st review. By April 2023 2 nd review	A reviewed and updated priority list of potential sites.	2nd review and update are 100% complete. Staff finished working on related prep work such as basin delineation, MS4 outfalls, surface waters, WOTUS updates. The canopy shade assessment was updated in FY23.
				Engineering Division Water Resources Division	Update the existing inventory identifying potential sites.	By July 2021 – 1 st update. By July 2023 2 nd update		
			Task 2 - Continue to work to develop public/private partnership projects.	Engineering Division Water Resources Division	Continue to explore available options for partnering on projects.	Ongoing throughout the cycle	Meet with selected groups and propose partnerships to implement; target one public/private project for completion during the 5-year cycle.	Ongoing, 100% complete; work with LTWC, and UWWP groups, as well as Willamalane
			Task 3 - Review existing natural resource inventories and identify needs.	Community Development Division	Review existing natural resource inventories and identify needs.	By July 2022	Natural resource inventories reviewed, and next steps identified.	100% complete; LWI, NR Inventory, and WQLWs in the UGB expansion areas all identified as needing updates. Awaiting review and approval by DSL.
		T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement	Task 1 - Additional review of Development Code for parking lot, streetscape, riparian vegetation management, setbacks, and buffers, and retrofit practices.	Community Development Division	Review the Development Code with key planning staff and determine if shading or riparian protection amendments are appropriate.	By April 2021	Review of Development Code for enhancement of riparian protection, parking lot shading, streetscape shading, setbacks/buffers and retrofit practices.	100% complete; review done, and gaps identified. Staff working on City-wide code updates and will incorporate any gaps into that adoption process.
				Community Development Division	If amendments are appropriate, staff may develop and initiate proposed changes for review by City Council, or work to include them in an amendment package.	By July 2022	Proposals brought to Council.	100% as no code needed updating at this time. Post-Construction Code Update project per MS4 Plan slated for Feb 28 2024
			Task 2 - Mill Race restoration, management and enhancements	Engineering Division Water Resources Division	Work to identify discrete projects that can advance overall restoration. These include work both inside and outside of the initial ACOE study area, such as in the Lower Mill Race.	By April 2021 and again by April 2023	Review and update project list.	2 nd review/update 100% complete; list reviewed and updated. Vegetation management continues along the Mill Race.
	Warm water discharges	T3 – Manage Industrial Warm Water Discharges	Task 1 - Identify industries within Springfield’s City limits with stormwater discharges and provide technical assistance to reduce warm water discharges and improve stormwater treatment where opportunities exist.	Water Resources Division	Continue to stay informed regarding the stormwater permits and provide feedback to industry and the DEQ, when applicable.	Ongoing throughout the cycle	Industrial stormwater permits reviewed, comments provided, and technical assistance provided as needed.	Ongoing: 100% for reporting FY21, FY22, FY23 – 1 reviewed in FY23.
				Water Resources Division	Reviews the list of current industrial stormwater dischargers within Springfield and identify opportunities to provide technical assistance.	Review/update by July 2020 Review/update by July 2022	List reviewed and updated as needed; opportunities identified.	100% complete; by July 2020 list developed and outreach approach started. FY22 100% complete, outreach to 2 business categories.
	Public Interaction	T4 – Public Outreach and Education	Task 1 - Continue to review, develop, and distribute outreach and education materials to the public.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY
				Water Resources Division		By June 2020 and By June 2023	Educational material assessed.	100% complete; by July 2020 & 2023 all PE materials reviewed and some material updated.

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>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
Bacteria	Sanitary sewer system	B1 - Sanitary Sewer Overflows - Work Practices	Task 1 - Review current standard operating procedures for sanitary sewer spill response. Amend or revise if appropriate.	Water Resources Division Operations Division	Review relevant SOPPs for spills and overflows.	by April 2021	Review(s) completed	100% compete –documents reviewed.
				Water Resources Division Operations Division	Revisions, if needed.	by January 2022	Approve and implement new or amended SOPPs if appropriate	100% complete – 4 SOPPs updated
			Task 2 - Review contractor work provisions to ensure contractors understand Springfield’s requirements for dealing with sanitary sewer spills.	Engineering Division Water Resources Division	Conduct review of relevant Springfield standard contracting specifications.	By April 2021	Review of contract specifications	100% compete –review was completed.
				Engineering Division	Develop revisions, if needed	By January 2022	Adoption of new or amended contractor work provisions, if appropriate.	100% compete – updates to contact information made.
	Animal/Pet waste	B2 - Animal/Pet Waste - Program Enhancement	Task 1 - Coordinate with local partners to identify additional locations for pet waste disposal stations in public areas and assist with placement and maintenance.	Water Resources Division	Continue to collaborate with local partners to identify additional prospective pet waste stations.	By April 2020 and By April 2022	Update and maintain a list of possible locations.	1 st round 100% complete – contacted Willamalane, School District, and OPS
				Water Resources Division	Continue to coordinate or otherwise assist with installation and maintenance of any new sites.	By August 2020 and By August 2022	Installation and maintenance of new sites.	2 nd round 100% complete – contacted Willamalane, School District, and OPS
				Water Resources Division	Continue to maintain an inventory of station locations	Ongoing throughout the cycle	Map updated and maintained.	1 st round 100% completed – one station replacement.
			Task 2 - Continue identification of pet care providers and services and identify outreach opportunities.	Water Resources Division	Continue to identify, review and update list of pet supply, service, and care facilities. Assess outreach needs and options.	By April 2020 and by April 2022	Update list of facilities and outreach needs and options.	2 nd round 100% complete – three new stations installed.
				Water Resources Division	Continue to coordinate with facility owners on educational material distribution and track location and materials.	Ongoing throughout the cycle	Continued distribution of outreach materials.	Ongoing – 100% complete this reporting FY - locations tracked in PEO App.
				Water Resources Division	Continue to offer and provide facilities technical assistance in proper waste management.	By April 2020 and by April 2022	Reach out to participating facilities. Track participation.	Ongoing – 100% complete this reporting FY - material distribution continues.
			Task 3 - Continue pet waste outreach and education at public events and distribute outreach materials.	Water Resources Division	Continue to identify and review options for distributing outreach materials that discuss proper waste management.	By April 2020 and by April 2022	Updated list of distribution sites	100% complete and ongoing
				Water Resources Division	Review and update, as needed, program educational materials.	By June 2020 and by June, 2023	Review, revise, and approve current educational.	100% complete and ongoing
				Water Resources Division	Hold at least one Canines for Clean Water pledge event each fiscal year.	Starting July 2019	One pledge event per FY held.	100% complete Options assessment was completed twice.
			Task 4 - Wildlife feeding outreach and education.	Water Resources Division	Continue to coordinate with partners such as the park district and City Operations staff to identify locations of wildlife feeding, and if appropriate post signs.	By April 2021 and by April 2023	Updated list of locations. If appropriate, the number of new signs installed.	100% completed this reporting FY; all material reviewed FY23
				Water Resources Division	Continue to track distribution and update inventory	Ongoing throughout the cycle	Location map updated and maintained.	100% complete this reporting FY, Pet Fest June 2023.
				Water Resources Division	Continue to explore adopting a wildlife feeding ordinance.	By April 2022	Review done and options investigated.	100% complete this reporting FY. Signs provided to Willamalane in FY23.
								Ongoing – 100% complete this reporting FY; sites tracked in App.
								100% complete – review and investigation completed.

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>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
Bacteria	Sanitary wastes	B3 - Septic Tank, Transient Camping and Private Sanitary Infrastructure Outreach and Education	Task 1 - Maintain a septic system inventory for sites within the City limits; work with property owners to provide public sanitary services when feasible. Review, update, and deliver educational material as appropriate.	Water Resources Division Information Technology	Continue to maintain a septic system inventory within the City limits.	Ongoing throughout the cycle	Updated septic system inventory.	Ongoing; 100% complete this reporting FY, inventory updated.
				Engineering Division	Continue to -work with property owners within the City limits to provide public sanitary services when feasible. Continue to incorporate and extend services as appropriate.	Ongoing throughout the cycle	Properties within the City Limits connected to public system, as appropriate.	Ongoing; 100% complete this reporting FY – 7 new connections.
				Water Resources Division	Review, update as needed, and deliver outreach and educational materials to owners.	By April 2020 and by April 2023	Outreach and educational material updated and distributed.	100% complete, brochures and postcards mailed out in FY23.
			Task 2 - Continue investigations into sanitary waste disposal practices.	Water Resources Division	Continue to identify target audiences and develop and distribute outreach material specific to them which incorporate BMPs and relevant regulatory requirements.	By April 2020 and by April 2023	Audiences identified; educational material developed and delivered.	100% complete FY23 – lists updated and 28 mailers sent out.
			Task 3 - 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.	Water Resources Division Operations Division	Review and update procedures & priority site determination criteria with PD and Operations staff as needed.	By April 2020 and by April 2022	Policies, procedures, and priority list reviewed and updated.	100% complete – program description updated
				Water Resources Division Community Development Division	Work with landowners and regional partners, as needed, to enforce illegal camping regulations on private property.	Ongoing throughout the cycle	Enforcement of illegal camping that may impact open waterways.	Ongoing – 100% complete - enforcement a combination of IDDE and Code Enforcement.
				Water Resources Division Operations Division	Assess known campsites on public land and update the priority list for removal. Continue to investigate campsite deterrent measures.	By July 2020 and by July, 2022	Assess known illegal camp sites and updated priority list.	100% complete; FY23: 2 sweeps, 23 camps cleaned.
	Public Interaction	B4 – Public Outreach and Education	Task 1 - Continue to review, update, develop, and distribute outreach and education materials to the public, as needed.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY.
				Water Resources Division		By June 2020 and by June 2023	Educational material assessed.	100% complete; all PE materials reviewed in FY23
Mercury	Construction site soil erosion	M1 - Limit Construction Site Erosion	Task 1 - Continue to review existing LDAP construction site erosion control program.	Engineering Division	Staff will review the LDAP program to determine if program revisions, enhancements, or modifications are appropriate.	Review by April 2021 and update by July 2022, if appropriate.	Current program reviewed and updated, as appropriate.	100% complete; Code updates will be made per MS4 Plan schedule.
				Engineering Division	Refer construction activity within Springfield’s jurisdiction that requires 1200C permits, to the Oregon DEQ.	Ongoing throughout the cycle.	Tracking of 1200C permit referrals.	100% complete this FY – tracking/referring maintained
		M2 - Enhance Post Construction Support	Task 1 - Continue Water Resources staff participation in the City’s development plan review process.	Engineering Division Water Resources Division	Continue involvement by engaging in the review process for proposals requiring engineering review and/or smaller scale developments that include water quality or LIDA.	Ongoing throughout the cycle	Involvement in the review process for developments having WQ and/or LIDA proposals.	Ongoing - 100% complete this reporting FY
				Engineering Division Water Resources Division Community Development Division	Continue to provide assistance, as needed, in the review and update of design standards and or codes as they relate to water quality facilities and post-construction development requirements.	Ongoing throughout the cycle	Involvement in the review and updating of design standards and or codes as they relate to water quality facilities and post-construction development requirements	Ongoing – 100% complete this reporting FY; planning efforts for code review and identifying gaps in process.
				Water Resources Division	Review program, adaptively manage, update as needed.	By April 2022	Assessment/review of program; updated as appropriate.	100% complete; program documents reviewed and updated.
				Water Resources Division Engineering Division	Continue program implementation within resource limitations.	Ongoing throughout the cycle	Continue implementation of a Water Quality Facility Management Program.	Ongoing – 100% complete this reporting FY
	Urban street runoff	M3 - Street Sweeping, Catch Basin, and Pipe Cleaning Programs	Task 1 - Continued implementation of the current programs for street sweeping and catch basin and storm drainage pipe cleaning. Adaptive management of program practices and standards to enhance maintenance standards, as needed.	Operations Division	Continue implementation of street sweeping and storm system cleaning programs to reduce pollutants in the public ROW and drainage system(s).	Ongoing throughout the cycle	Ongoing tracking and reporting of street sweeping and storm system cleaning.	Ongoing – 100% complete: 3,834 curb miles swept in FY23
				Operations Division	Strive to inspect/clean at least 10% of City owned catch basins/inlets per year.	Starting July 2019	Strive to inspect/clean at least 10% of City owned catch basins/inlets per FY; track and report.	100% complete: 23.7% of City basins cleaned in FY23
				Operations Division Water Resources Division	Review existing sweeping, catch basin, and pipe cleaning program practices/standards and develop enhanced standards, as needed.	Review by July 2021 and update, as needed by January 2022.	Practices/standards reviewed and enhanced, as needed	100% complete: O & M strategy completed in FY23

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	Hazardous waste control	M4 - Hazardous Waste Control	Task 1 - Identify sources of mercury pollution and which household products, electronics, appliances, etc... may contain mercury and determine what pollution prevention projects/programs are feasible to implement.	Water Resources Division	Review and update, as needed the mercury pollution source assessment; research sources of mercury and determine what pollution prevention projects/programs the City has resources to implement.	By April 2021 and by April 2023	Complete Mercury pollution source assessment updated.	100% complete; Mercury Source Assessment was completed in 2021 & 2023.
			Task 2 - Use household waste collection events to encourage proper disposal of items containing mercury.	Development and Public Work Department	Springfield will continue to participate in and support events involving hazardous waste.	Ongoing throughout the cycle	Participate in public collection events and promote Lane County Hazardous Waste Collection Center.	Ongoing; 100% complete; Spring Clean Up and Lane County Home Show in FY23
	Public Interaction	M5 – Public Outreach and Education	Continue to review, develop and distribute outreach and education materials to the public, as needed.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY.
				Water Resources Division		By June 2020 and By June 2023	Twice during the cycle, educational material assessed.	100% complete; 2020 all PE materials reviewed and some material updated in 2023.
Mercury and Other Pollutants	Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#1 Public Education and Outreach	Task 1 - PE1 - Public Education and Outreach Strategy (PEOS)	Water Resources Division	Draft a Public Education and Outreach Strategy.	By June 30, 2022	Strategy drafted and implemented.	100% completed, strategy completed and updated quarterly
					Continue to update Council and Commission as needed.	Ongoing throughout the cycle	At least one time annually on program implementation.	100% complete this cycle – Council was routinely updated on stormwater programs.
					Review and update as needed, the IGA with Lane County on NPDES Services.	By July 1, 2022	IGA with Lane County on NPDES Services drafted and implemented.	100% completed, the IGA with L.C. was updated and renewed.
			Task 2 - PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts	Water Resources Division	Targeted public education and outreach implementation; distribute educational message to targeted audiences.	Ongoing throughout the cycle	A minimum of one educational message to each audience annually.	100% complete, we conducted: 30 interactions of which 26 included people from the UTZ; these covered all target audiences.
					Develop program review template and assess progress toward program implementation annually.	By June 30, 2022 template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.
					Develop an education and outreach activity assessment; conduct one activity assessment per year.	By June 30, 2021	Assessment of one education and outreach activity per/yr. in the Annual Report.	100% complete; an assessment of one activity (Earth Day) was completed – included in the MS4 annual report.
					Continued activity tracking, include a summary of the program review and assessment of one education and outreach activity per/yr. in the Annual Report.	By Nov 1 annually	Activity assessment and program review included in annual reports.	100% complete; ongoing tracking, submittals, and reporting.
		#2 Public Involvement and Participation	Task 1 - PI1 – Public Involvement and Participation/Access	City of Springfield	Continue to implement a public participation process.	Ongoing throughout the cycle	Continue to provide opportunities for public input on the stormwater programs in various forms.	Ongoing – 100% complete this FY. Website access and posting of MS4 Plan and Annual Reports.

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>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
Mercury and Other Pollutants	Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#2 Public Involvement and Participation	Task 1 - PI1 – Public Involvement and Participation/Access	Environmental Services	Review the required MS4 General Permit website posting requirements and update as needed.	By June 30, 2022	Review completed and website updates implemented.	100% complete; a website compliance review was completed and updated made as necessary in FY22.
			Task 2 - PI2 – Public Involvement and Participation Stewardship/ Reporting	Environmental Services	Continue facility enhancement projects and researching project opportunities. Continue to make program enhancements.	Ongoing throughout the cycle	Implementation of at least one stewardship opportunity during the 5-year term.	100% complete; participated and partnered with regional partners on 4 events in FY23.
					Develop program review template and assess progress toward program implementation annually.	By June 30, 2022, for template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.
		#3 Illicit Discharge Detection and Elimination	Task 1 – ID1 - Illicit Discharge Ordinance, Response, Enforcement, and Tracking	Development and Public Works	Continue to respond, enforce, and track illicit discharges and complaints.	Ongoing throughout the cycle	IDDE incidents responded to, enforced, and tracked.	Ongoing– 100% complete this FY.
				Water Resources Division	Perform a review of the response and enforcement program at least once during the permit term and update as needed.	One time during the permit cycle	Review of the response and enforcement program completed.	100% complete; a compliance review was competed and SOPPs and program documents updated as needed.
				Water Resources Division	Develop program review template and assess progress toward program implementation annually. Summarized IDDE tracking information.	By June 30, 2022, for template Nov. 1 annually for program review and tracking information	Template developed and annual program review completed. Summarized IDDE incident tracking reported.	100% completed; a template was developed, and program review completed.
				City of Springfield	Continue to implement and enforce an ordinance and/or other regulatory mechanisms to prohibit illicit discharges to the MS4.	Ongoing throughout the cycle.	Continued implementation of IDDE ordinance.	Ongoing– 100% complete this FY.
				Water Resources Division and City Attorney’s Office	Conduct a review of the existing enforcement mechanisms and update as necessary to meet the conditions of the MS4 Modified General Permit. If updates are identified take to Council for adoption by the end of the permit term, as necessary.	One time during the permit cycle.	Review of the existing enforcement mechanisms and updates as necessary completed.	100% complete; IDDE code adopted in FY23.
				Water Resources Division	Continue to implement IDDE enforcement procedures and enforcement matrix while a review of the enforcement matrix is conducted.	Ongoing throughout the cycle.	Continued implementation of IDDE enforcement procedures and enforcement matrix.	Ongoing and 100% completed. The matrix was reviewed and updated. Implementation is ongoing.
					The review and updates of the matrix, if needed, completed by, and submitted with the third annual report.	By November 1, 2023, the MS4 Modified General Permit extended this “by date” to the end of the permit term, February 28, 2024, if needed.	IDDE enforcement matrix submitted to DEQ.	100% completed. The matrix was reviewed, updated, and submitted with MS4 Annual Report in FY22.
			Task 2 – ID2 - MS4 Map	Technical Services Division	Continue ongoing GIS mapping and inventory of Springfield’s MS4 storm system infrastructure(s).	Ongoing throughout the cycle.	Ongoing mapping of City storm infrastructure.	Ongoing – 100% complete this FY - City GIS infrastructure updates are ongoing as new development occurs.
				Technical Services Division and Water Resources Division	Review mapping and inventory requirements as listed in the MS4 Modified General Permit and identify mapping gaps.	By Feb 28 2024	Updates to mapping gaps completed.	100% complete – gaps identified, and updates completed.
				Development and Public Works	Perform any in-field or desktop data gathering as needed to incorporate information in the UGB expansion areas and finish re-defining storm system basins.	By Feb 28 2024	Field work, if needed completed and storm basins redefined.	90% complete – LWI awaiting review and approval by DSL.

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Mercury and Other Pollutants	Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#3 Illicit Discharge Detection and Elimination (continued)	Task 2 – ID2 - MS4 Map	Technical Services Division and Water Resources Division	Dry-weather priority point locations will be identified under ID3 – Dry-weather Outfall Screening and incorporated into a mapping layer.	By Feb 28 2024	Dry-weather priority point locations identified, and mapping layer developed.	100% complete – MS4 outfalls identified and priority locations identified in FY23.
				Water Resources Division	Submit MS4 map to the DEQ.	By goal date November 1, 2022 (third annual report); MS4 Modified General Permit extended this to the end of the permit term, February 28, 2024, if needed.	MS4 map submitted to DEQ	100% completed - MS4 map digital links provided to DEQ in MS4 Annual Report.
			Task 3 - ID3 – Dry Weather Screening Program	Water Resources Division	Develop a dry-weather screening program; identify outfalls and priority locations and have the program ready to implement field screening of outfalls.	June 30, 2022 – draft program/ locations June 30, 2023 – begin screening MS4 Modified General Permit extended this to the end of the permit term, February 28, 2024, if needed.	Dry-weather program drafted and begin screening.	100% completed – Dry-weather Screen Program being implemented.
					During the third fiscal year begin outfall screening to achieve 40% of the MS4 outfalls screened.	By the end of the permit term.	Achieve 40% of the MS4 outfalls screened.	100% completed
					Development of a pollutant parameter action level list.	By November 1, 2022.	List developed and submitted to DEQ.	Screened 39% of MS4 outfalls in FY23.
				Development and Public Works	Develop an IDDE training strategy, which is part of a larger internal staff training strategy.	By June 2022 strategy completed.	At least once during the permit term persons involved in IDDE program implementation are trained.	100% complete – PPAL list has been developed and submitted in the MS4 Annual Report.
								IDDE training 100% complete (23 staff trained in FY23), training strategy completed in FY23.
			Task 4 - ID4 – Non-Stormwater Discharge Assessment	Water Resources Division	Ongoing implementation of the Non-Stormwater Discharge Assessment Evaluation and the Product Assessment reports.	Ongoing throughout the cycle.	Ongoing implementation of reports.	Ongoing – 100% completed this FY22.
					Review the Non-Stormwater Discharge Assessment Evaluation, update as needed.	By June 30, 2022	Non-Stormwater Discharge Assessment Evaluation, update as needed.	100% complete – assessment document reviewed and updated to meet the MS4 General Permit allowable discharges.
					Review the Non-Stormwater Discharge Product Assessment, update as needed.	By June 30, 2022	Non-Stormwater Discharge Product Assessment, update as needed.	100% complete – assessment document reviewed and updated.

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Mercury and Other Pollutants	Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#4 Construction Site Runoff Control	Task 1 – CSW1 – Erosion and Sediment Control Regulations	City of Springfield	Continue to implement existing Municipal Code and Springfield Development Code provisions for construction activities.	Ongoing throughout the cycle.	Continued implementation of Municipal Code and Springfield Development Code provisions for construction activities.	Ongoing – 100% completed FY23.
				Community Development Division	Review the existing LDAP Program and City codes to ensure that construction project sites that result in a minimum land disturbance of 7,000 sq.ft. meet the requirements listed in the MS4 Modified Permit.	By June 30, 2022	Review completed.	100% completed – a compliance review was done, a code update team identified sections needing updates.
					Updates, as needed, to existing codes and standards to ensure compliance.	By February 28, 2024	Updates to code/standards, if needed.	50% completed – updates slated for adoption in FY24
					Verify current process for referral compliance with other NPDES permits for construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development).	By June 30, 2022	Process reviewed and verified.	100% completed – 1200C referral process in place. 1200CA was just updated in FY23 and in place.
					Continue DEQ referrals as appropriate.	Ongoing throughout the cycle.	Continued DEQ referrals as appropriate.	Ongoing – 100% completed FY23.
			Task 2 – CSW2 – Land Drainage Alteration Permit (LDAP) Program	Community Development Division	Ongoing implementation of LDAP Program runoff controls and site plan review.	Ongoing throughout the cycle	Continued implementation of LDAP Program runoff controls and site plan review.	Ongoing – 100% completed FY23.
					Review existing erosion and sediment control site plan requirements and process to ensure compliance with MS4 Modified General Permit Erosion and Sediment Control Plan requirements and Plan Review Process.	By June 30, 2022	Review of ESC site plan requirements completed.	100% completed – compliance review completed FY22.
					If needed, update requirements for erosion and sediment control site plan requirements and plan review process; take to Council for adoption if appropriate.	By February 28, 2023 (Modified General Permit extended to Feb. 28, 2024).	Updates taken to Council, if needed.	To be completed in FY24
			Task 3 – CSW3 – Inspection and Enforcement	Community Development Division	Continue to track, enforce, and inspect construction sites and investigate and enforce construction related nuisance violations throughout the permit term.	Ongoing throughout the cycle.	25% of construction sites that disturb less than one acre are inspected at least once during the permit term.	100% complete FY22 FY23: 214 Permits Issued 630 Inspections Performed = 97%.
					Review the inspections and enforcement procedures and if needed, update procedure requirements and components; take to Council for adoption if appropriate.	Review by June 30, 2022 Updates if needed, by Feb 28, 2024	Review completed and updates taken to Council.	100% completed – compliance review completed FY22.
					Review and update as needed, the enforcement matrix and submit to the DEQ.	By the third annual report (November 1, 2023, Modified Permit extended this to February 28, 2024, if needed).	Enforcement matrix reviewed, updated, if needed and submitted to DEQ.	Updates on track to meet timeline.
			Task 4 – CSW4 – City Staff Erosion Control Training	Community Development Division	Continue to maintain a comprehensive and professional level of erosion control training for LDAP staff.	Ongoing throughout the cycle.	Training maintained.	100% competed – matrix submitted in MS4 Annual Report. If updates are made will re-submit.
				Water Resources and Community Development Division	Develop an Erosion and Sediment Control Education and Training Strategy, which is part of a larger strategy for training internal staff.	June 30, 2022	Provide training, at least once during the permit term, to persons involved in ESC program implementation.	100% completed FY22, incorporated into a larger strategy in FY23.

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Mercury and Other Pollutants	Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#4 Construction Site Runoff Control (continued)	Task 4 – CSW4 – City Staff Erosion Control Training	Environmental Services and Community Development Division	Increase outreach and education to the private sector through activities such as the development and distribution of factsheets, brochures and through mailings.	Ongoing throughout the cycle.	Part of PE2 - Public Education and Outreach on Pollution Prevention and Stormwater.	See Task 2 - PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts. 100% complete FY23 – newsletter created and distributed, email list created, TV slide created. Fact sheets to be finalized FY24.
				Water Resources Division	Develop program review template and assess progress toward program implementation annually.	By June 30, 2022, for template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.
	Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#5 Post-Construction Site Runoff for New Development and Re-Development	Task 1 - DS1 – Post Construction Stormwater Management Codes and Standards	Community Development Division	Continue to implement existing post-construction requirements and site plan review process for development and redevelopment.	Ongoing throughout the cycle.	Continued implementation of post-construction requirements and site plan review process.	Ongoing – 100% completed FY22.
					Review, as needed, <ul style="list-style-type: none"> Existing Post-Construction codes/standards Barriers to low impact development Site plan review process(s) and ordinance Retention, treatment, and mitigation	By February 28, 2024	Post-construction code and standards review completed.	100% complete – review identified gaps and needed updates.
					Draft findings and take to Council, as needed.	By September 1, 2023 - Modified Permit extended to Feb 28, 2024.	Findings drafted and taken to Council if needed.	To be adopted in FY24
			Task 2 - DS2 - Post Construction Stormwater Facility Long-Term Operation and Maintenance	Water Resources Division	Continue implementation of the WQF Management Program which includes inventory, site inspections as well compliance actions to MEP.	Ongoing throughout the cycle	Continued WQF Management Program implementation.	Ongoing – 100% completed FY23. 179 postcards, 631 total inspections, 364 initial inspections and 137 in non-compliance (vegetated and structural)
				Community Development Division and Water Resources Division	Review Dev. Code and EDSPM language and see if updates to O&M language are warranted.	Review by June 30, 2022 Updates, if needed by February 28, 2024	Review completed and taken to Council if needed.	100% complete – code section was reviewed, and changes identified. Will be moved from EDSPM to SDC as part of post-construction updates in FY24.
				Water Resources Division	Review Water Quality Facility Management Program; identify any refinements. Update as needed.	By February 28, 2024	Water Quality Facility Management Program review completed.	100% complete – the WQF Mgt. Program documents were reviewed and updated FY22.
			Task 3 - DS3 – Post Construction Stormwater Management Training, Tracking, and Assessment	Water Resources Division	Develop a Post-Construction Runoff Education and Training Strategy, which is part of a larger internal staff training strategy.	June 30, 2022	Provide training to persons involved in program implementation at least once during the permit term.	100% completed FY22, incorporation into a larger strategy in FY23.
					If a post-construction runoff control certification becomes available in Oregon, seek funding to have relevant O&M inspection staff certified.	Ongoing throughout the cycle	Seek funding to have relevant O&M inspection staff certified.	Ongoing – NA nothing available.
					Develop post-construction program review template and assess progress toward program implementation.	By June 30, 2022, for template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.

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Mercury and Other Pollutants	Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#6 Pollution Prevention and Good Housekeeping for Municipal Operations	Task 1 - OM1 – Routine Maintenance Operations for Water Quality	Operations Division	Continue to implement routine infrastructure maintenance activities to reduce stormwater pollution throughout the permit term to MEP.	Ongoing throughout the cycle.	Continue to implement routine infrastructure maintenance activities.	Ongoing – 100% completed FY23.
					Draft a Maintenance Strategy for stormwater controls, include catch basin and litter management.	By June 30, 2022	Draft strategy drafted and implementation started.	100% complete – Operations Maintenance Strategy completed in FY23.
					Annually inspection of the owned or operated catch basins and clean as needed, Maintain inspection and cleaning records.	By November 1 annually and by Feb 28 2024	Annually inspect at minimum 10% of the owned or operated catch basins and clean as needed, with a goal to meet 50% at least once in the permit term.	100% on track FY23 = 1490 catch basins cleaned/inspected, 92.3 tons material removed = 23.7%
			Task 2 - OM2 -- Pollution Control Manuals and Guidelines for City Operations	Operations Division	Continued implementation of the Pollution Control Manual for Routine Maintenance Activities, and other stormwater pollution guidance manuals and/or documents to minimize impacts to stormwater runoff.	Ongoing throughout the cycle.	Continued implementation of the Pollution Control Manual and guidance documents.	Ongoing – 100% completed FY23
				Water Resources Division and Operations Division	Develop a review and update schedule for pollution reduction and control guidance documents.	By February 28, 2024	Goal to review and update, if needed, at least two documents a year.	100% complete for the development of a schedule; SPCC for fuel facility and SWPCP for Operations complex completed FY23.
				Operations Division	Review regulations and determine if any City facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit.	By June 30, 2021 By June 30, 2022	Review completed and findings drafted.	100% complete – 1200Z Determination completed in January 2021.
			Task 3 - OM3 – Municipal Operations Training, Tracking, and Assessment	Water Resources Division and Operations Division	Develop a Pollution Prevention in Municipal Operations Staff training strategy which will be part of a larger staff training strategy.	June 30, 2022	Provide training to persons involved in program implementation at least once during the permit term.	100% completed FY22, incorporated into training strategy in FY23
					Develop a pollution prevention and good housekeeping program review template; assess progress towards implementation of the program.	By June 30, 2022, for template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.