



National Pollutant Discharge Elimination System

Stormwater Discharge Permit

Extended Permit Fourteenth Year Annual Reporting

For Springfield, Oregon

For the Reporting Periods

July 1, 2019 - June 30, 2020

City of Springfield
springfieldstreams.org



Please Note:

This is the fourteenth annual report for Springfield's MS4 permit that expired on December 31, 2011. Springfield is currently operating under an administratively extended permit.

This report covers the period from July 1, 2019 to June 30, 2020.

Purpose

This report fulfills the requirements for annual reporting of progress toward full implementation of Springfield's *National Pollutant Discharge Elimination System (NPDES) Phase II Municipal Separate Storm Sewer System (MS4) Stormwater Management Plan (SWMP)*, as required by Springfield's NPDES MS4 Stormwater Discharge Permit, provisions of the Oregon Revised Statutes (ORS) 468B.050, and the federal Clean Water Act. Its purpose is to document progress toward full implementation through the tracking of annual benchmarks and milestones set forth in the SWMP and to present modifications and amendments to the SWMP resulting from adaptive management of Springfield's program.

Background

Provisions of the NPDES program in the Clean Water Act require that municipalities obtain a permit for, and regulate, the discharge of pollutants in their urban stormwater runoff to the *maximum extent practicable (MEP)*. Pollutant reduction is achieved through the implementation of pollution reduction programs and practices collectively known as *Best Management Practices (BMPs)* that are required to be included in the permittee's SWMP.

Springfield's SWMP includes a list of BMPs developed specifically for this jurisdiction, along with a work plan and implementation schedule covering a five-year period, intended to correspond to the five-year term of the NPDES permit. Springfield's NPDES Stormwater Discharge Permit was issued by the DEQ on January 25, 2007, and an interim report was issued for the period from April 1 through June 30, 2007. Springfield submitted its first full year Annual Report, for the period July 1, 2007 to June 30, 2008, in November of 2008. The Second Annual Report, for the period July 1, 2008 to June 30, 2009 was submitted in November of 2009 and re-submitted by the direction of the DEQ in August of 2010. The Third Annual Report, for the period July 1, 2009 to June 30, 2010, was submitted in November 2010. The City's Fourth and Fifth Annual Reports, for the two reporting periods: July 1, 2010 to June 30, 2011 and July 1, 2011 to October 31, 2011 were submitted as a combined report in November of 2011. The reason for the combined report was due to the permit expiration date of December 21, 2011. The Sixth Annual Report was submitted in November of 2012 covering the period November 1, 2011 to June 30, 2012. The Seventh Annual Report was submitted in November of 2013 covering the period July 1, 2012 to June 30, 2013. The Eighth Annual Report was submitted in October of 2014 covering the period July 1, 2013 to June 30, 2014. The Ninth Annual Report was submitted in October of 2015 covering the period July 1, 2014 to June 30, 2015. The Tenth Annual Report was submitted in October of 2016 covering the period July 1, 2015 to June 30, 2016. The Eleventh Annual Report was submitted in October of 2017 covering the period July 1, 2016 to June 30, 2017. The Twelfth Annual Report was submitted in October of 2018 covering the

period July 1, 2017 to June 30, 2018. The Thirteenth Annual Report was submitted in October of 2019 covering the period July 1, 2018 to June 30, 2019. This report represents Springfield's Fourteenth Annual Report, covering the period July 1, 2019 to June 30, 2020.

General Considerations for Reporting

Springfield adopted its SWMP in January, 2004, with the anticipation that its NPDES MS4 permit would be issued shortly thereafter. The BMP implementation schedule included in the SWMP was prepared accordingly and includes a schedule starting in fiscal year 2003-04 and progressing through the balance of the anticipated 5-year schedule. Due to legal challenges to aspects of the DEQ's NPDES permitting regulations, the actual date of permit issuance was delayed until 2007. However, Springfield moved ahead in a measured fashion with implementation of some aspects of the SWMP. In April of 2009 the DEQ and Springfield came to an agreement to adjust the effective date for permit renewal and the SWMP schedule; the permit was issued January 25, 2007 with an expiration date of December 31, 2011. This required Springfield to change the implementation schedule dates in its SWMP to reflect the agreed-upon schedule, followed by City Council re-adoption in April of 2009.

The Second Annual Report, submitted in November of 2009 and re-submitted in August of 2010, was finalized by the DEQ in January 2011. The status of the Third Annual Report (November of 2010), and the Fourth and Fifth Annual Reports (November of 2011), are unknown as DEQ has not provided comment on the reports. The Sixth and Seventh Annual Report status (November 2012 and 2013) is unknown as DEQ has not provided comment on the reports, though DEQ has acknowledged receiving them. Receipt of the Eighth, Ninth, Tenth, Eleventh, Twelfth, and Thirteenth Annual Reports were acknowledged by the DEQ. Springfield is drafting this Fourteenth Annual Report with the assumption that the DEQ has no comment(s) needing to be addressed before the reporting deadline.

Many tasks outlined in the SWMP were initiated in 2004, before the actual issuance of Springfield's stormwater permit. Most tasks are ongoing, in accordance with Springfield's adopted SWMP and its original implementation schedule. Others are scheduled for initiation in a specific year and proceed onward, while yet others are discrete tasks occurring in only one year. Under the current administratively extended permit Springfield has continued to implement ongoing tasks that were outlined in the original permit.

In addition to reporting progress with implementation of the SWMP BMPs, the Annual Report is the DEQ's preferred method for introducing any amendments to the SWMP. Amendments may be in response to requests by the DEQ to add or change provisions of the SWMP, or to make the SWMP consistent with new regulatory requirements and programmatic needs. Amendments may also be initiated by Springfield as a result of adaptive management needs within the stormwater

program. Both of these types of changes are allowed by Springfield's MS4 permit, and DEQ guidance recommends that these amendments should be made through the annual reporting process. A revised SWMP and set of BMPs was submitted to DEQ in June 2011 as part of the City's original permit renewal application process. As mentioned previously, the City is currently operating under an expired permit that has been administratively extended; therefore, no additional amendments are being requested in this annual report.

Additionally, the DEQ will no longer be issuing Individual MS4 Stormwater Permits and has changed to an MS4 General Permit process for Phase II communities. This will require the redrafting of Springfield's SWMP and a re-submittal process in the future.

This report was compiled through analysis of the various BMPs implemented throughout the permit reporting period and the history of the SWMP. A working committee of City staff reviewed activities, programs, and identified gaps and future programmatic efforts throughout Springfield. Their contribution, as well as that of the DEQ permit staff, is acknowledged.

Regulatory Context

This report is submitted to the Oregon DEQ to satisfy the requirements of ORS 468B.025, and 40 CFR 122.41.

Anti-Backsliding

No adaptive management amendments to the SWMP are proposed for this reporting period, as such, there is no "Backsliding" as defined in the federal Clean Water Act (CWA 303(d)(4), CWA 402(c) or CFR 122.44(l)).

Relation to SWMP

Springfield is required to conduct an annual review and if needed, an update of its SWMP (Schedule A, Condition 6a), and evaluate program compliance, appropriateness of BMPs, and progress toward stated goals. This information is to be reported to the DEQ in an Annual Report, and required to be submitted to the Oregon DEQ by November 1 of each of the permit years.

Reporting Requirements

This Annual Report is required to include the following information:

- Status of compliance with permit conditions, assessment of the identified BMPs, progress toward reducing the discharge of pollutants to the MEP, and measureable goals for each control measure;

- Results of analysis of information used to assess the success of the program;
- Summary of activities Springfield plans to undertake for the next reporting year;
- A description of changes made to the SWMP, including changes to BMPs or goals identified in the SWMP;
- Information on all adjustments to the boundaries of Springfield;
- Notification if Springfield is relying on any other government entity to satisfy some of the permittee’s obligations, if applicable; and,
- Number and nature of enforcement actions taken.

A summarized discussion of each of these items is included, below:

Status of compliance with permit conditions, assessment of the identified BMPs, progress toward reducing the discharge of pollutants to the MEP, and measurable goals for each control measure.

Springfield is in substantial compliance with the provisions of its Stormwater Management Plan. Progress toward full implementation of the SWMP is summarized in the attached *Stormwater Implementation “Program-at-a-Glance”* Summary table.

A team representing the Development and Public Works Department, Environmental Services, Community Development (Engineering), Current Development (Planning) and Operations Divisions, has assessed this summary. Their assessment acknowledges the implementation schedule in the SWMP including the current status of the MS4 permit as being administratively extended and recommends no additional modifications or amendments to the existing SWMP at this time.

The existing SWMP was adopted by the Springfield City Council and amended to incorporate changes negotiated with the DEQ from the 08-09 reporting period. As part of the permit renewal application process, proposed revisions to the SWMP were submitted to the DEQ in June 2011 with the permit renewal application. While under administratively extended permit status, Springfield is still implementing the 2010 SWMP that was approved by the DEQ and adopted by Springfield City Council even though the timelines of the SWMP goals and tasks are outdated. Springfield will continue to use the City’s 2010 SWMP and will redraft an appropriate revised SWMP once the MS4 General Permit issuance process is completed. Currently that expected date is unknown at this time.

Analysis of Information Used to Assess the Success of the Program

Springfield’s stormwater management responsibilities are spread across divisions and departments and are summarized and updated in the *Stormwater Implementation “Program-at-a-Glance”* document. Programmatic evaluation includes staff input, inspection logs, and ongoing

adaptive management. Water quality monitoring is not used as a compliance indicator or program evaluation tool, but is used as a management tool in evaluating overall watershed health and to prioritize water quality improvement efforts.

Summary of activities Springfield plans to undertake for the next reporting year

Springfield's current permit and reporting activities under the current SWMP expired on December 31, 2011. Future activities relating to stormwater management were included in Springfield's Proposed Draft SWMP Chapter 5 BMP implementation schedule, dated June 2011. Springfield's Proposed Draft SWMP, dated June 2011, and MS4 permit renewal is pending as of the drafting of this annual report. As a result, Springfield continues to implement and improve upon activities as listed in the 2010 approved and adopted SWMP. Since Springfield's permit renewal submittal in 2011, the Oregon DEQ has determined a need to revisit the MS4 permit renewal process for Phase 2 communities and had convened an MS4 Advisory Committee to develop a general permitting process for Oregon. The Oregon DEQ issued the MS4 General Permit, effective March 1 2019 for all Phase II communities in Oregon. The MS4 General Permit has not become effective for Springfield at the time of this report submittal, as the City is currently engaged in litigation with DEQ regarding the General Permit. Future activities relating to stormwater management included in Springfield's Proposed Draft SWMP Chapter 5 BMP implementation schedule, submitted in 2011 will most likely change due to the extended time between the 2011 drafting and the approval of the General Permit process. Additionally, since the General Permit process is much different than the Individual Permit process the General Permit will contain the details of the BMPs and their implementation, the SWMP will most likely be redrafted to summarize planned activities, reference a MS4 Implementation Plan, and include reference to the General Permit.

A description of changes made to the SWMP, including changes to BMPs or goals identified in the SWMP

Past BMP Implementation Schedule Adjustment – DEQ Requested

DEQ had requested, and Springfield proposed, that the implementation schedule outlined in the original SWMP be amended to align with DEQ's recommended "Permit Year," based on the issuance of Springfield's NPDES MS4 permit in 2007. Further, DEQ had requested that the first year of implementation of the BMP implementation reporting schedule be a place holder report for April 1, 2007, through June 30, 2007, and subsequent permit years precede based on this date. Thus, Permit Year 1 became July 1, 2007 through June 30, 2008, with the permit ending year 5 on December 31, 2011. BMP implementation schedule adjustments were made in 2007 and annual reporting continues while Springfield is in extended status.

Currently there are no proposed amendments for this reporting period.

Proposed Adaptive Management SWMP Amendments

The SWMP was developed in 2003, prior to the implementation of several of Springfield's current stormwater management programs and practices. Formal implementation of the SWMP was initiated shortly after final adoption of the SWMP in 2004. Since that time, BMP implementation tasks contained in the SWMP have been completed.

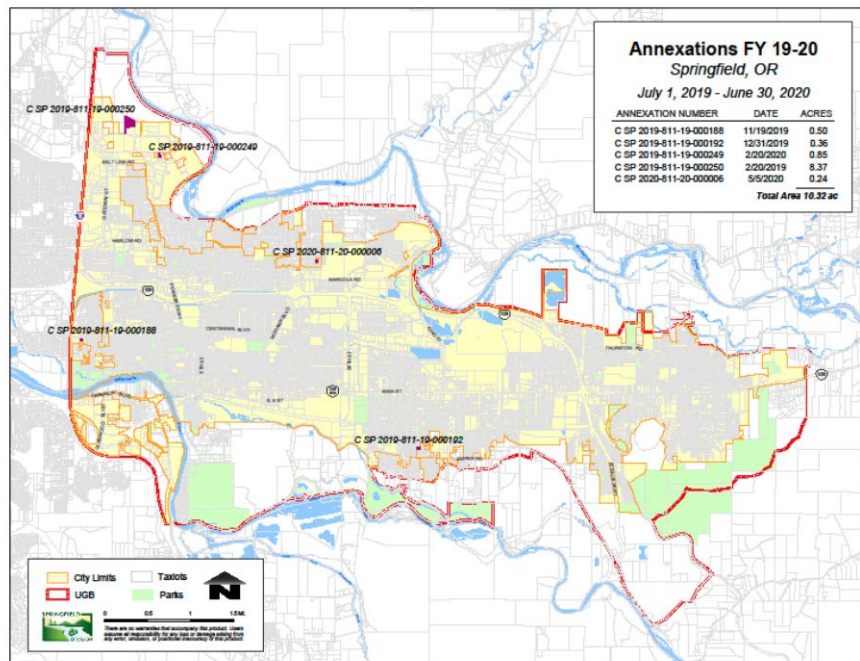
Over the course of the implementation process, certain adaptive measures were identified to streamline the SWMP implementation, enhance the effectiveness of the programs, and increase the efficiency with regard to resource management. These measures are collectively considered adaptive management of the SWMP.

Springfield is not requesting adaptive management amendments for this reporting period.

Information on all adjustments to the boundaries of Springfield

Springfield periodically annexes land located inside its Urban Growth Boundary (UGB) as development proceeds. The annexation process is contained in the Springfield Development Code.

Annexations to Springfield from legal records during the reporting period(s) are shown on the annexation map.



Notification if Springfield is relying on any other government entity to satisfy some of the permittee's obligations, if applicable

Springfield is not relying on any other government entity to satisfy any of its obligations.

Number and nature of enforcement actions taken

Enforcement actions relating to Springfield's NPDES MS4 permit include the areas of Illicit Discharge Detection and Elimination (IDDE Program), Construction Site Runoff Control (Land & Drainage Alteration Permit Program, or LDAP) and Post-Construction Stormwater Management. Springfield approaches compliance in these programs with an emphasis on education and cooperative compliance, but with the regulatory authority to escalate the impact of its efforts to achieve compliance. All three programs have dedicated staffing and conduct inspections and outreach according to written work plans.

Illicit discharge compliance is overseen by the City's Water Resources IDDE Program. Construction Site Runoff is regulated through Springfield's Land Drainage Alteration Permit (LDAP) Program. The Water Resources group also oversees compliance for the Water Quality Facility Management Program. All three of these programs are implemented by Springfield's Development and Public Works Department.

The results below outline the scope and nature of actions taken by Springfield during the period from July 1, 2019 to June 30, 2020:

IDDE Program

Complaints received and responded to: 59
Enforcement citations/actions initiated: 0

Calls responded to by the Operations Division:

(Including illicit discharges + hazardous materials reports): 139
SSO's: 0

Land Drainage Alteration Permit (LDAP) Program

Permits Issued = 133

Under one Acre = 36
Between One and Five Acres = 6
Over Five Acres = 1
Part of Greater Common Plan = 90

Inspections = 512

Passed = 509
Failed = 3
Under one Acre = 194
Between One and Five Acres = 51
Over Five Acres = 11
Greater Common Plan = 256
Enforcement Actions = 0

Post Construction WQ Facility Inventory and Inspection Program.

Inventory and inspection totals are calculated from July 2019 – June 2020. Inspections typically occur between July and October. Note that inventory and inspection numbers are for individual facilities; sites are inventoried where there maybe more than one facility per site.

Totals include both vegetated and structural facilities.

- New inventoried facilities – vegetated and structural: 56
- Inspected, follow-up, and/or re-inspected (facilities): 456
- New vegetated facilities found in non-compliance: 2 out of 104
- New structural facilities found in non-compliance: 55 out of 105
- Citations initiated: 1

SWMP Amendment and Adoption Process

Springfield’s SWMP has been adopted by the City Council, and so requires a formal process for amendment, including public participation. Any amendments included in this report and its attachments, and any comments or additional conditions negotiated with the DEQ for inclusion into the SWMP will be incorporated into the proposed SWMP amendments. The amended SWMP will be presented to the Springfield City Council for review and ultimate adoption. An amended final SWMP document will then be forwarded to the DEQ. Accordingly, this submittal cannot commit to specific amendments that will ultimately be included in the SWMP.

Statement of Compliance

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

 9/29/2020
Matt Stouder, Environmental Services Division Director

Attachment: Attachment A, Stormwater Implementation "Program-at-a-Glance."

**Stormwater Implementation "Program-at-a-Glance"
Extended Permit July 1, 2018 to June 30, 2019
City of Springfield**

Program Area	BMP Identification	BMP Description	Responsible Party ^{3,4}	Implementation Tasks ¹ from SWMP	Measurable Goals ¹	SWMP Goal(s) ¹ Achieved ?	Accomplishments, proposed changes and plans
Public Education	PE1	City Council and Planning Commission Communication and Coordination	Public Works Director	<p>Update City Council and Planning Commission on effectiveness of stormwater outreach efforts each year.</p> <p>Solicit feedback from City Council on effectiveness of communication.</p> <p>Evaluate the public's perception of the City's success at addressing the 7 key outcomes.</p>	<p>Use public events, periodic surveys, or consultation with Planning Commission or City Council members to solicit feedback.</p> <p>Communicate with Council to solicit feedback on effectiveness of outreach efforts. Relay this information to the Council and Commission.</p> <p>Solicit feedback from council during work sessions to evaluate success of presenting City's SW program requirements.</p>	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • Council was updated on various SWMP Programs, MS4/TMDL Annual Reports, and MS4 Permit status, including the Up Stream Art project, Clean Water University, the Georgia Pacific Natural Area Plan, Virginia Daisy Bikeway, Canines for Clean Water, and MS4 General Permit status. • Continued to update Council through regular sessions, work sessions, and briefing memos. Some of the topics included: stormwater user fees, cancelations of Public Works Week, Franklin Blvd. project, Brooklyn Swale, and Clean Water University reformatting for virtual sessions. • Stormwater annual user fee increases presented in July were approved by Council.
Public Education (cont.)	PE2	Outreach Efforts with Regional Partners	Maintenance Manager ESD Manager	<p>Continue partnerships in local and statewide programs.</p> <p>Review effectiveness of partnership programs yearly</p>	<p>Evaluate participation in Pollution Prevention Coalition (P2C), Association of Clean Water Agencies (ACWA), and other partnerships.</p> <p>Evaluate partnerships for effectiveness and ability to produce value to the City</p>	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • Maintained membership and participation with regional partners - P2C, ACWA, Groundwater Guardians, McKenzie Watershed Council, Middle Fork Willamette Watershed Council, Long Tom Watershed Council, McKenzie Watershed Emergency Response System, Stormwater Special Operations, National PW Association, Lane Community College, Landscape Stakeholders, City of Eugene, Lane County, Team Springfield, Springfield School District, MWMC, Willamalane Parks and Recreation, Clean Water Coalition, Metro Clean Water Partners, and Spring Clean-Up Partners. • The 4th UpStream Art contest was completed and 5 new murals about keeping stormwater clean were painted at the Booth Kelly Trailhead next to the Mill Race in August of 2019. This event allows selected local artists to paint storm drain murals in the downtown area as an educational tool linking stormwater runoff and pollution. • The 5th Up Stream Art contest kicked off in April 2020. Project planning and outreach occurred during this reporting period for the Sept 2020 event. • Reached out to Willamalane and provided them with 6 "Please Don't Feed the Wildlife" signs for local parks. • 3 new pet waste stations were installed. Continued program outreach with Willamalane Park & Rec District, in City ROW, and with Springfield School District; 54,300 bags provided to partners and 5,800 bags replaced at City stations. • The regional ACWA Stormwater Summit was canceled this year due to COVID-19. • There was one meeting with regional partners to host another training workshop for landscape contractors, but the training was canceled due to COVID-19 this year. • Ongoing efforts with the Fish Friendly Car Wash Kit Program resulted in 4 kits going out, 51 flyers sent out to fund raising groups and 3 groups took advantage of the gift card incentive. • The Earth Day art contest for a street sweeper vehicle wrap was canceled this year due to COVID-19. • Continued metro-wide Pressure Washing Program where local shops distribute brochures and have equipment tags. Two booklets and 37 brochures were distributed. Staff reviewed the material and prepared to visit stores in March but due to COVID-19 businesses were closed. • 129 Springfield residents pledged to scoop the poop at events, online, or at City Hall. 1

**Stormwater Implementation “Program-at-a-Glance”
Extended Permit July 1, 2018 to June 30, 2019
City of Springfield**

Program Area	BMP Identification	BMP Description	Responsible Party ^{3,4}	Implementation Tasks ¹ from SWMP	Measurable Goals ¹	SWMP Goal(s) ¹ Achieved ?	Accomplishments, proposed changes and plans
Public Education (cont.)	PE2 (cont.)	Outreach Efforts with Regional Partners (cont.)	Maintenance Manager ESD Manager	Continue partnerships in local and statewide programs. Review effectiveness of partnership programs yearly (cont.)	Evaluate participation in Pollution Prevention Coalition (P2C), Association of Clean Water Agencies (ACWA), and other partnerships. Evaluate partnerships for effectiveness and ability to produce value to the City (cont.)	Yes	<p>public pledge event for the Canines for Clean Water Program (C4CW) was held. COVID-19 prevented us from having any social gatherings after March 2020. The program distributed 123 bandanas, 281 bag holders, and 103 yard signs, and 5 business signs at local events and at City Hall. Additionally, 86 pledges were made during the online photo contest for a spot in the 2021 calendar. 3,845 2020 calendars went out. Social media and 2 news media outlets picked up on the contest.</p> <ul style="list-style-type: none"> • City staff gave a tour of the stormwater treatment park at the Mill Race to the USACE and Oregon Chapter of the American Planning Association. • The Clean Water Gardens program had 432 brochures taken by the public at local events and distributed at garden centers. 91 “Clean Water Gardener” gloves were also given away. The numbers are much lower this year because of COVID-19 and not being able to hold public events. • The Clean Water Gardens demonstration project continues to be maintained by School District staff. • The Drug Take Back drop box that collects unused prescription drugs for proper disposal continues to fill regularly. One regional drug round-up event was held. Social media, flyers, and TV news promoted the event. • The EcoBiz Program continued to work with local auto shops in maintaining certification. There was 2 site visits, 2 re-certifications, and 1 mailing sent to 60 shops during the reporting period. • The Paint Waste Program continued to distribute brochures at participating local businesses; 39 English and 20 Spanish brochures went out. Also there were 9 taken at public events that Springfield was able to participate in prior to COVID closures. Lower numbers due to COVID-19 closures. • 200 Septic Maintenance brochures were mailed to residents on septic within the City Limits and 3,200 were provided to Rainbow Water District to mail out as billing inserts to their customers and to have in their office. The Septic System Program is ongoing in cooperation with SUB and Rainbow Water District. The brochures were updated in the winter of 2020. Additionally, 13 septic surveys were sent out. This was done to determine if they were still on septic within the City Limits. • The Annual Spring Cleanup was postponed this year due to COVID-19 and will be reported on in the next cycle. This event distributes clean water brochures and collects tons of appliances, electronics, metal, yard debris, and other house hold waste products that can be recycled or reused. • Held stormwater booths at the Good Earth Home Show and the Children’s Celebration, where a large variety of education and outreach material was distributed. The Lane County Home and Garden Show was canceled due to COVID-19 this year. • There were 4 Little Litter signs given to maintenance staff for posting around City Hall. • Springfield participated in the annual Willamette River cleanup. • Gave out 19 mercury brochures, and 60 trade in vouchers; 1 mercury trade-in voucher exchange occurred during this reporting cycle. Number low to cancelation of events due to COVID-19. • Ten garden centers and nurseries were sent BMP mailers. • The DWP Map was updated – this map identifies sites that have drinking water protection permits and/or well head protection signs, and have a water quality facility on site. This tracking/mapping effort is in cooperation with SUB water. • Staff gave away 149 “springfieldstreams” pens and 85 Frisbees at the Children’s celebration, Up Stream Art, and Stream Team events. • The regional partner group met and discussed a new outreach effort on the source and use of zinc. Also worked with U of O students on a research project to identify sources of zinc.

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Public Education (cont.)	PE3	Stormwater Education School Workshops	ESD Manager	Develop a stormwater education workshop; promote thru school district, provide workshops, update and review program.	Measure effectiveness through teacher surveys. Provide workshops and update and review programs.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> 700 students participated in Clean Water University fall classes. Staff participated in the Children’s Celebration and the Environmental Connect events. Public Works Week and Earth Day events were canceled due to COVID-19 this year.
Public Education (cont.)	PE4	Stormwater Educational Brochures Portfolio	ESD Manager Maintenance Manager	Continue to develop, review and distribute public educational portfolio material to key PW field staff each year. Continue to provide stormwater educational material, spill response information and SOPPs to new PW staff each year. Review field logs and update portfolios as necessary.	Log field observations of SW impacts. Continue to provide materials and training to new and key Public Works staff based on the types of call outs, field observations, and SW programs. Evaluate program annually with field staff; revise program as appropriate to enhance effectiveness.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Over the years this BMP has evolved to be more than portfolios carried in City vehicles with outreach material distributed in the field during call outs. It has evolved into website material, website reporting, online response material such as educational material, and factsheets about water quality programs and projects. Portfolios are still carried in key response vehicles; material is updated and restocked annually. Six portfolios were updated. Staff made improvements to the City website making it more user friendly, reviewed and updated factsheets/ handouts, and posted current TMDL and MS4 Annual Reports. All of the educational material went through a simple evaluation process and was updated accordingly; approximately over a 100 pieces of materials and events went through review. Factsheets are handed out at pollution call outs and at events; 20 were posted as door hangers in response to yard debris dumping, and 12 were handed out during call outs.
Public Education (cont.)	PE5	Utility Billing Inserts	ESD Manager Springfield Utility Board (SUB)	Develop print, and distribute inserts once per year in sewer billing statements.	Continue to develop 1 insert per year. Track feedback from customer’s inquiries to determine effectiveness.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Two utility billing inserts were developed and distributed during this permit cycle; 32,000 inserts along with 1,700 digital in July 2019, and 32,800 inserts along with 1,900 digital in March 2020. The focus was on how fees are spent on stormwater programs, user’s fees, car care, and a new brochure “Our water: It’s all connected” was created about stormwater and its connection to drinking water and the difference between stormwater and wastewater. Additionally in March 2020 Rainbow Water District requested 140 hard copies for their counter.
	PE6	Technical Assistance and outreach to targeted businesses / industries	ESD Manager	Initiate technical contacts with major industries with NPDES permits. Continue outreach to include targeted industries included in EPA guidance. Evaluate program effectiveness and adapt program as appropriate to enhance cooperation and effectiveness. Continue inspections, complaint response, and compliance efforts.	Initiate contacts with NPDES permit holders. Initiate contact with targeted industry and businesses. Adaptively manage program based on evaluation. Adapt program as appropriate Conduct periodic inspections at sources Respond to and log industry-related complaints. Provide technical assistance/ training as industries and businesses become identified and	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> There was one 1200z industrial permit reviewed in Spfld. jurisdiction during this reporting time frame. Staff additionally requested pollution control plans and DMRs from 22 industries for review. Continued outreach to targeted industries and businesses; distributed 100 brochures, and 3,845 calendars to pet related businesses. The list of pet related businesses was updated. The paint waste education project distributed 39 English brochures and 20 Spanish to local paint centers. The pressure washing program distributed 37 tri-fold brochures and 2 booklets to distributors of pressure washers. The Clean Water Garden booklet distribution in garden centers and at events resulted in 432 booklets distributed. The Assessment of industrial and commercial sites continued; the focus changed to inventorying and evaluating industrial sites and/or industries that have the potential to contribute point source loading. The first stage of this project developed a list of industries/businesses, permit type, and potential pollutants. During this reporting period staff met and discussed options and reviewed materials for a planned outreach effort in FY21. Due to statewide COVID-19 closures it was decided not to reach out during the spring and summer of 2020 as some businesses were closed. Ongoing efforts with the Fish Friendly Car Wash Kit Program resulted in 4 wash kits

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					/or part of the outreach program		<p>going out, 51 flyers sent out to fundraising groups with 3 gift card incentives handed out.</p> <ul style="list-style-type: none"> • Businesses and industries required to have drinking water protection signs posted and have a water quality facility on their site were inspected and provided with water quality information to ensure the facility remains in compliance and that WHP signs are posted. This inspection process is done as part of the WQF Management Program. The Drinking Water Protection list and map was reviewed and updated. • The EcoBiz Program continued to work with local auto shops in maintaining certification; we worked with a local non-profit organization to improve outreach efforts. There were 2 re-certifications, 2 site visits, and 1 mailing sent to 60 shops during the reporting period. • Technical assistance, education, and training are provided during all illicit discharge responses. This includes providing outreach and technical assistance for activities such as pressure washing, painting, vehicle/equipment washing, pesticide use, pet waste management, illegal dumping, and construction site management. 12 factsheets were handed out at 59 incidents by Water Resources staff. • The Clean Water Biz (CWBiz) reached out to 65 auto shops, 10 car wash businesses, 18 pet care providers, and 8 garden and nursery centers informing them about the CWBiz Program and BMPs for their business. There was 1 auto shop visited and it became Springfield's 1st certified CWBiz.
Public Education (cont.)	PE7	Clean Water Storm Drain Curb Markers and Door Hangers	ESD Manager Maintenance Manager	Implement Clean Water Storm Drain Curb Markers and Door Hangers city-wide (5 yr goal).	Install curb inlet markers over the course of the SWMP. Record installations.	Yes	<p><u>For reporting period 7-1-2019 thru 6-30-2020</u></p> <ul style="list-style-type: none"> • This task is considered completed. • Ongoing efforts until permit renewal will consist of monitoring and/or replacing as needed, or identifying missed areas. • A GIS layer was created that notes the type of marker and location is maintained on an ongoing bases. Additionally, field staff now has the ability to update the map inventory in the field with a tablet. • There were 168 installs of which 62 are in the UTZ.
Public Involvement & Participation	PI1	Public Involvement/Participation	ESD Manager	Identify and implement public involvement activities in implementing Stormwater Policy, implementation actions and BMP's.	Provide opportunities for public input on SW program thru various venues, Appraise City Council of stormwater Plan implementation efforts annually	Yes	<p><u>For reporting period 7-1-2019 thru 6-30-2020</u></p> <ul style="list-style-type: none"> • Council was updated on various SWMP Programs, MS4/TMDL Annual Reports, and MS4 Permit status. • Continued to update Council through regular sessions, work sessions, and briefing memos. Some of the topics included: stormwater user fees, Canines for Clean Water Program and Calendar Contest, CW University, Phase 2 of the Franklin Blvd. Project, Glenwood Riverfront area design concepts, Up Stream Art, and the Groundwater Guardian 2019 plaque presentation, where the connection between stormwater and drinking water was highlighted. • Stormwater annual user fee increases presented in July were approved by Council. • Social media, the City's website, workshop surveys, teacher/student surveys, on-line reporting, and Water Resources public email all provide ways for the public to provide feedback on projects and issues concerning them. • Annual Reports are posted to the City web page where the public has the opportunity to review and provide feedback.

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Public Involvement & Participation	PI2	Water Resource Area Awareness / Facility Enhancements	ESD Manager Maintenance Manager	Initiate program development and organize participants. Evaluate and update Facility Enhancement Program as appropriate.	Initiate program for citizen involvement in facility enhancement projects. Identify other resource areas and develop public outreach activities	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • Four Stream Team events were held, 304 volunteers participated in various clean up events, and 1,685 plants were planted along waterways. Springfield’s Stream Team promotion was done via social media posts and an advertisement in the BRING tour of home pamphlet. • A new event, “Scouts Day at the Mill Race,” included macro identification, plant ID, and stormwater awareness booths and culminated in planting natives along the Mill Race. This day was planned and implemented by the City with Scouts BSA and Willamalane in March of 2020 • There was also an article in the Creswell Chronicle about Springfield’s Stream Team and 9 flyers handed out at events. • 2 City staffers participated in the regional Willamette River Cleanup; an annual event. • As part of the Facility Enhancement Program and the Clean Water Gardens Program, the native plant nursery continues to be utilized and maintained; 425 plants were propagated. • Water Resource staff replaced 1 boundary sign at a public water quality pond, and repaired one that was vandalized at another public pond. • Project funding to the McKenzie Watershed Alliance that works on various enhancement projects along the McKenzie River continued with our annual partner donation. • The Mill Race Restoration Project is complete and in the O&M stage. Additional enhancements are continually looked into as the opportunity arises. The Youth Corps. cleared around 20ac of invasive plants. Interpretive signs about the project and stormwater facilities are maintained by City and Willamalane staff (ongoing).
Illicit Discharge Program	ID1	Illicit Discharges Reporting Hotline and Tracking System	ESD Manager	Operate the hotline, publish and promote the phone number and document calls received each year. Implement program improvement as warranted.	Log the number of ID complaints, and track the follow up actions.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • 59 water quality related incidents logged and responded to during reporting period by IDDE staff and 139 by Operations staff. • IDDE staff regularly evaluates the program, reporting process and response procedures. All calls and field-reported complaints are maintained in the IDDE database or in the Operations Infor System. • Website reporting improvements, including the development of an online stormwater pollution reporting process, have been made, along with additional improvements to improve access to factsheets, educational materials, and programs. The website is evaluated annually and modifications incorporated. • Signs that are posted in response to pollution also carry reporting information. • The IDDE Program has been fully integrated into the larger City tracking and mapping processes. This has streamlined the tracking and documentation process, and allows for a broader City staff audience to access the data.
Illicit Discharge Program (cont.)	ID2	Illicit Discharges Response and Enforcement	ESD Manager City Engineer Maintenance Manager City Attorney	Implement protocols for responding to complaints. Maintain database. Review and evaluate the program, review and/or revise SOPP’s as needed. Develop and adopt enforcement guide. Implement, review and update as needed.	Monitor effectiveness of incident response program. Review and/or revise as needed.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • IDDE staff did a complete review of program documents and procedures and updated relevant contact information. • 59 water quality related incidents logged and responded to during this reporting period by IDDE staff and 139 by Operations Staff. • The IDDE Program has been fully integrated into the larger City tracking and mapping processes. This has streamlined the tracking and documentation process, and allows for a broader City staff audience to access the data. • 3 IDDE door hangers in response to ongoing IDDE problems were distributed in various neighborhoods.

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				Develop modifications to the Urban Transition Agreement as needed.	1 st year development with subsequent years being tracking and reviewing of UTA.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Continued implementation of IGA for NPDES services with Lane County. Continued to track and respond to IDDE callouts within the UTZ. Key staff from WR’s and Lane County continued to meet and discuss efforts in regards to the IGA to provide NPDES Service. The IGA was signed in April 2020.
Illicit Discharge Program (cont.)	ID2 (cont.)	Illicit Discharges Response and Enforcement (cont.)	ESD Manager City Engineer Maintenance Manager City Attorney	Conduct staff training & maintain enforcement tool kit	As needed provide training and updates to enforcement protocols.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> IDDE and Water Resource staff participated in various spill response webcasts, trainings, and regional response drills. WR staff attended the Stormwater Symposium fall of 2019. The MWERS response team held one regional drill during this reporting period, IDDE staff participated in the drill. 7 ESD staff received 8 hr. Hazwoper refresher training. 5 DPW staff maintained their CESCL certification. IDDE, WR, Operations, Pre-treatment, and LDAP staff job shadowed each other during the permit cycle to better understand job duties and process. 2vehicle spill kit awareness training presentations were given to 26 DPW staffers by WR staff. WR staff continued Spanish classes to better communicate with non-English speaking residents while responding to an illicit discharge, water quality facility maintenance, or a complaint.
Illicit Discharge Program (cont.)	ID3	Outfall Inventory and Mapping	ESD Manager	Conduct yearly outfall map updates. Maintain outfall mapping	Update outfall mapping annually. Conduct physical re-inspections of new or redeveloped areas every 4 years. Maintain outfall mapping	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> City’s GIS database of stormwater infrastructure system is updated on an ongoing basis from asbuilts and construction projects as they come in. Additional updates made from field assessments, inventories, and survey projects on ongoing basis. Outfall and connecting system updates are made annually from information obtained during WQ facility inspections. The City’s GIS and WR staff began working on updates to the storm basin and sub-basin boundaries and on updating surface waters and MS4 outfall information. These are expected to be multiyear projects; efforts are ongoing. WR staff researched Dry Weather Programs from other municipalities and drafted a program with the possibility of implementing a Dry Weather Program in the future.
Illicit Discharge Program (cont.)	ID4	Water Quality Monitoring for Illicit Discharges	ESD Manager	Conduct WQ monitoring of all significant outfalls to drainage ways. Evaluate monitoring results to identify pollutants of concern and identify illicit discharges. Conduct follow-up investigations to identify and eliminate ID’s as needed.	WQ monitored at significant outfalls over a 5 yr period. Monitoring results evaluated and pollutants of concern identified. Compliance efforts, including education and consultation, documented.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Conducted WQ sampling and source tracking at 6 IDDE locations. Ongoing compliance efforts in conjunction with ID2 and PE6 efforts.
Illicit Discharge Program (cont.)	ID5	City-wide Illicit Discharge Detection and Elimination	ESD Manager Maintenance Manager	Develop staffing for IDDE program. Ongoing incident response and tracking activities.	Develop and present proposal to City Council for IDDE staff. Maintain staffing and program development Track illicit discharge incidents and follow up activities.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Ongoing incident tracking and response through hot line calls, website complaints and field observations. 3 IDDE door hangers were distributed in response to IDDE problems. 59 water quality related incidents logged and responded to during reporting period by IDDE staff and 139 by Operations Staff. Staff is still gathering data for an IDDE outreach assessment. This project will be worked on as time allows and new IDDE staff becomes more experienced.

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Illicit Discharge Program (cont.)	ID5 (cont.)	City-wide Illicit Discharge Detection and Elimination (cont.)	ESD Manager Maintenance Manager	Ongoing technical assistance to industry.	Provide technical assistance and education to business as appropriate.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • Ongoing technical assistance to targeted business/industry is ongoing in conjunction with PE6. • Staff requested 22 Stormwater Pollution Control Plans from 1200z industries during this cycle. Staff also requested and reviewed DMRs from 22 industries. • The assessment of industrial and commercial sites continued with meetings, project development, and research. The focus is to inventory and evaluate industrial sites and/or industries as well as certain types of businesses that have the potential to contribute point source loading. A list of industries/businesses, permit type, and potential pollutants was reviewed and updated in preparation of an outreach effort. • There were annual wash rack inspections done at 5 Fire Stations, the Justice Center, and Operations to ensure compliance with wash-water discharges. • The EcoBiz Program continued to work with local auto shops in maintaining certification; there were 2 site visits, 2 re-certifications, and 1 mailing sent to 60 shops during the reporting period. • As part of the Clean Water Biz Program. 8 garden centers/nurseries, 18 pet care providers, 10 car washing businesses, and 65 auto shops received program invitations and information resulting in 1 inspection, 1 site visit, and one business becoming Springfield's first CWBiz.
Illicit Discharge Program (cont.)	ID6	Non-Stormwater Discharge Assessment	ESD Manager	Address activities in response to actual pollutants observed. Evaluate available data and appropriate local controls. Develop local assessment and implement.	Review monitoring, inspections, and follow up data and assess non-SW discharges. Assess data and determine if local control of identified pollutant sources is needed.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • All discharges listed in MCM #3 vi and vii have been evaluated. Implementation, discussions, and enforcement continued. • No changes were made during this permit cycle; BMP practices were reviewed. • No products were reviewed this reporting period as part of the Product Assessment guidance document. This document is a companion document to the Non-Stormwater Discharge Assessment document; it reviews and provides BMPs for common products used in activities such as dust control, moss control, and snow and ice control.
Construction Site Runoff Control	CSW1	Erosion and Sediment Control Regulations	ESD Manager Development Services Director City Engineer Maintenance Manager	Implement existing Muni Code and Development Code provisions. Continue Code review for erosion and construction site runoff control effectiveness	Track LDAP inspections, permits, and code violations. Assess inspection/violation data annually and evaluate effectiveness, of the City regulations.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • Ongoing permit inspection and tracking (see Annual Report's narrative on page 8 • LDAP factsheet (educational handouts) were reviewed and updated. Factsheets are available at counters and on the City web page. • The LDAP Program went through a review and implemented Code changes in 2014/2015, there will be no additional changes until the MS4 General Permit is issued; staff will then do a program review to meet any new compliance requirements.
Construction Site Runoff Control (cont.)	CSW2	City Staff Erosion Control Training	City Engineer	Conduct staff training on an ongoing basis; update as needed.	Provide comprehensive erosion control training at least annually. Evaluate training opportunities provided and their effectiveness.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • LDAP staff continued to maintain professional CESCL certification and training in order to provide enforcement and to stay current on erosion and sediment control regulations and techniques. 2 LDAP staffers are certified; additionally, 1 Operations, 1 Water Resources, and 1 Engineering staff are certified. • IDDE staff job shadowed LDAP staff this reporting period. • Staff participated in various webinars that discussed erosion control, energy dissipation, bank stabilization, river behavior, and construction site runoff.
Construction Site Runoff Control (cont.)	CSW3	Land Drainage Alteration Permit (LDAP) Program	City Engineer	Implement the LDAP program on an ongoing basis.	Develop and implement written LDAP program work plan.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • The establishment of the City's LDAP Program and Plan was completed many permit cycles ago. Ongoing implementation of the Program continues.
			Planning Div. Manager	Track LDAP compliance and impacts to WQ annually.	Evaluate LDAP database to determine if the volume of permits issued annually is achieving compliance.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • City staff continues to improve communication and tracking to further link development review, development application & inspection with the LDAP inspection process. • Ongoing evaluation of the number of permits, types of violations and contractor compliance. See Annual Report's narrative on page 8.

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				Conduct LDAP program evaluations on an annual basis and address inadequacies as appropriate.	Review program, including inspection database and compliance issues and identify adaptive management strategies as needed.		
Construction Site Runoff Control (cont.)	CSW4	Inspections and Enforcement	ESD Manager City Engineer Maintenance Manager Community Services Manager Planning Div. Manager	Implement existing Code authority on an ongoing basis. Review and amend the Code as appropriate. Conduct inspections on an ongoing basis.	Track construction site inspections and nuisance violations similarly to LDAP inspections. Review violations on an annual to bi-annual basis to identify needed code amendments. Investigate and inspect nuisance violations; log events and results.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Ongoing tracking and site inspections. See Annual Report’s narrative on page 8. Staff began using an infield mobile application for inspection and tracking making the inspection process and documentation more efficient.
Post Construction Stormwater Management for New Development and Re-Development	DS1	Springfield Development Code Standards and Engineering Design Standards and Procedures Manual	Planning Div. Manager City Engineer ESD Manager Community Services Manager	Review code and proposed amendments as appropriate. Seek City Council approval and adoption of amendments each year. Review Engineering Design Standards and Procedures manual and amend as needed. Implement existing Codes/Design manual and track/analyze effectiveness at achieving BMPs that comply with pollutant reduction MEP requirement.	Track Site Plan Review and Land Division approvals for adequacy of SW quality management. Review EDS&P Manual; amend as appropriate. Track compliance achieved in private maintenance of stormwater management system.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Continued and ongoing Water Resources staff participation in development review process to ensure adequacy of proposed SW management facilities in new development. The site review process is tracked and maintained by the DPW Engineering and Planning staff. Completed the LIDA Policy Evaluation component of the Glenwood Stormwater Evaluation in Fall 2019, the purpose of the component of the Glenwood Stormwater Evaluation was to review, assess, and recommend amendments to Section 4.17.1 of the EDS&P (City’s requirements for Low Impact Development Approaches (LIDA) to ensure that they: a) accurately align with the policies and implementation strategies of the Phase I Glenwood Refinement Plan (Appendix A) for stormwater quality management; b) are clear and objective; and c) adequately detail the procedures, criteria, and tools necessary to implement the Phase I Glenwood Refinement Plan stormwater quality management policies. A long term WQ Facility Inventory and Inspection Program continues being implemented and program adjustments made. See narrative on page 9 for inspection and compliance information. Water Quality Facility Inventory and Inspection Program staff works with LDAP staff to ensure compliance in a WQ facility inspection certification process. WR staff identified the need to update the EDS&P in regard to chapters on stormwater management, water quality, and vegetation. This formal review and update is on hold pending the MS4 General Permit litigation.
Post Construction Stormwater Management for New Development and Re-Development (cont.)	DS2	Post-Construction Stormwater System Maintenance Inspections and Compliance	ESD Manager	Develop long term BMP inspection and enforcement program. Maintain inspections and compliance activities.	Continue with inventory and inspection program. Track/analyze program effectiveness and success/failures of BMPs observed over time. Adapt as needed.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> The Water Quality Facility Inventory and Inspection Program is currently being implemented and program adjustments are being made. See narrative on page 9 for inventory and inspection details. Water Quality Facility Inventory and Inspection Program staff works with LDAP staff to ensure compliance in a WQ facility inspection certification process. Ongoing implementation of the field tablet for inspections and staff continue to work out program and process bugs. Additional work consisted of maintaining and updating information on the WQF information webpage and 206 postcards went out to remind facility owners to maintain their facilities. Staff attended various webcasts on green infrastructure, facility O&M’s, and rainwater harvesting. Ongoing partnership with the Long Tom Watershed Council to implement an Urban Waters Trout Friendly Landscaping Program in Springfield. The LTWC will provide

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							<p>outreach and education to try and encourage businesses in Spfld. to install vegetated water quality facilities voluntarily as retrofits. This project now has expanded to include other regional partners such as SUB, EWEB, and Willamalane.</p> <ul style="list-style-type: none"> • The DWP Map was updated – this map identifies sites that have drinking water protection permits and or well head protection signs, and have a water quality facility on site. This effort is in cooperation with SUB water. • Spfld. and Eugene partnered on offering a landscape contractor training to provide training on how to maintain vegetated facilities; no trainings or flyers went out this year, only meetings due to COVID-19 closures. • Operations Division maintained 22 public structural facilities and 15 vegetated.
	DS3	Stormwater Facilities Master Plan (SWFMP) and Capital Improvement Program (CIP)	Public Works Director	Develop, adopt and implement the SWFMP and CIPs	Complete and adopt SWFMP, and implement SW-quality related capital improvement project on an ongoing basis as prioritized in the plan.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • Stormwater piping and open system projects are annually incorporated into ongoing rehab projects when appropriate. No sanitary rehabs took place during this permit cycle; planning and design work only. • The Brooklyn Swale, Fuel Facility retrofit, and Phase 1 of the Virginia bikeway were completed. • Multiple projects and studies are either in design or construction stage such as Channel 6 Master Plan - flood control and water quality projects, Glenwood Stormwater Evaluation, and Phase 2 of the Virginia bikeway tree wells and planters. • Planning and design work began on the 72nd St Channel; restoration and improvements for vegetation, flow, and infiltration are planned. • UGB expansion was acknowledged by the State April 2019; project planning for natural resource updates in the expansion area began. Also in the expansion area, a project is in the planning stages to review and if needed incorporate drinking water protection overlay districts in time of travel zones. • Planning for Phase 2 of the Franklin Blvd. project continues.
Pollution Prevention in Municipal Operations	OM1	Pollution Control Manuals for City Operations	ESD Manager	Ongoing implementation of the Pollution Control Manual for Routine Maintenance Activities.	Review and update manual as necessary, on a biennial basis.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • No manuals were in need of updates this cycle. Staff will review, and if needed, update manuals pending the General Permit litigation. • Staff participated in webcasts on water quality, green infrastructure, SW management, Hazmat, erosion and sediment control, and IDDE. Staff additionally attended the Stormwater Symposium, seminars and conferences related to water quality and SW management. Some DPW staff renewed CESCL Certification, WQF Inspector Certification, and LID Inspector Certification. Job Shadowing was also done between divisions to better understand operations and procedures. • Ongoing City-wide composting and recycling programs continue. Staff reviewed and updated guidance information as needed. • The wash racks at 5 fire stations, Operations, and the Justice Center were inspected. • Vehicle spill kits were inventoried, restocked, and two training presentations were given with 26 people attending.
			Maintenance Manager	Conduct training as appropriate.	Receive staff feedback; adaptively manage and revise manual as necessary.		
				Initiate review of other City activities.	Review of other City activities and develop pollution control guidance as needed. Implement pollution control guidance.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • See above for details under OM1. • Additionally the Regional Fuel Facility went through a retrofit that re-routed the catch basins from storm system to sanitary system and installed an additional spill shut off and containment value and basin. The facility changes were done as best management practices and were not required by any modifications or code; just good housekeeping. • It is anticipated that since the fuel facility had a retrofit completed that in the next reporting cycle the SPCC will be updated to reflect the changes.
Pollution Prevention in Municipal Operations (cont.)	OM2	Stormwater Quality Technology Pilot Program	ESD Manager Maintenance Manager	Conduct pilot testing of stormwater quality technologies on an ongoing basis, review results.	Continue to acquire, test, and track SW management products; evaluate each.	Yes	<p>For reporting period 7-1-2019 thru 6-30-2020</p> <ul style="list-style-type: none"> • Ongoing monitoring of the demonstration rain garden / naturescape site continues. • The wash racks at 5 fire stations, Operations, and the Justice Center were inspected. • Water Resource staff tested a new method for detecting optical brighteners in runoff and/or water flows.

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Pollution Prevention in Municipal Operations (cont.)	OM3	Channel Assessment	ESD Manager Maintenance Manager	Update the Channel Assessment as needed as a result of new development.	Track updates to the assessment on an annual basis.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Continued ongoing updates to GIS mapping for stormwater infrastructure. Ongoing updates of open waterways as identified. Continued with the Water Quality Management Program Inventories/inspections. This provides additional continuity and connectivity to the Channel Inventory by having a complete inventory, assessment and picture of a system’s features from the start of the system to the end. Currently, updates being made are through the WQ facility inventory and inspection program as this BMP goal was completed. There have been no additional changes made to Spfld. waterways that would require an additional assessment at the present time. The UGB expansion was approved April 2019 and staff began identifying needed natural resource updates. The Local Wetland Inventory (LWI) update project could identify additional channels within our newly expanded UGB.
	OM4	Vehicle Maintenance Facility Stormwater Pollution Control Plan (SPCP)	ESD Manager Maintenance Manager	Implement Stormwater Pollution Control Plan (SPCP) at the City’s vehicle maintenance facility.	Periodic review and update of the plan biennially.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> See above OM1 for details. This is a voluntary BMP/housekeeping measure for Operations staff. The facility is not required to have a 1200z NPDES PCP. No updates were needed during this reporting cycle.
	OM5	Street Sweeping for Stormwater Pollution Control	ESD Manager Maintenance Manager	Maintain street sweeping program, and adaptive management process for sweeping work practices to increase effectiveness.	Maintain existing sweeping program; periodically assess effectiveness.	Yes	For reporting period 7-1-2019 thru 6-30-2020 <ul style="list-style-type: none"> Maintained sweeping schedule; routine sweeping and catch basin cleaning will continue into the next permit cycle. Over 5,177 curb miles of routine sweeping took place, with 1,268 tons of material removed. 757 catch basins were cleaned; numbers low due to COVID-19 closure. Additionally, 7,517 ft of storm line was cleaned, open channel O&M was done on 4,879 feet of system with 17 tons of debris and sediment removed, the leaf pickup program removed 258.13 tons of material, and Operations maintained 15 vegetated WQ facilities and 22 WQ structures.

Notes:

1. Measurable goals presented here are summarized from those presented in the SWMP. The full text of all of the goals and tasks is found in the narrative description of each minimum control measure and in the Development/Implementation Schedule of the SWMP document. Due to the extended permit status, the Development/Implementation Schedule for each BMP has expired. Implementation tasks and measureable goals are summarized to reflect ongoing implementation and/or the removal of completed tasks and goals.
2. Adaptive management is an integral part of the NPDES Phase II Stormwater Discharge Permit program. Adaptations to the BMPs included in the SWMP are referenced in this summary table. A full discussion of proposed modifications to the responsible parties, goals, or implementation tasks in the SWMP is found in the text and in Table 1 of the *NPDES Stormwater Discharge Permit Second Annual Report for the City of Springfield, Oregon*.
3. The Public Works Department is now the Development and Public Works Department.
4. The Maintenance Division is now the Operations Division.