CITY OF SPRINGFIELD, OREGON

DEVELOPMENT AND PUBLIC WORKS

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October 1, 2021

Oregon Dept. of Environmental Quality
MS4 Stormwater Program, ATTEN: Floor 7
700 NE Multnomah St. Ste 600
Portland, OR. 97232-4100

RE: City of Springfield FY21 MS4 Annual Report

MS4 Program,

Enclosed is Springfield's MS4 Annual Report for FY21. It outlines the City's progress toward full implementation of our stormwater management program. This report includes summaries of implementation efforts for the reporting period 6-01-2021 through 6-30-2021. Our permit cycle was 30 days for this reporting period; our permit was issued June 1, 2021. We are enclosing a copy of our TMDL Annul Report as a courtesy to show full program implementation for the fiscal year.

We are submitting one printed copy and one electronic copy per instructions.

Springfield anticipates continuing to move forward in our efforts in compiling with our recently issued MS4 Modified General Permit through the next reporting period. No adaptive management amendments are requested as a part of this annual report.

We welcome your continued support in meeting the goals of the Clean Water Act and providing us with any comments or concerns you may have.

Sincerely,

Sunny Washburn
Water Resources Supervisor
City of Springfield Oregon
225 5th Street
Springfield, Oregon 97477
541-736-1022 swashburn@springfield-or.gov

Enclosures: Springfield's FY21 MS4 General Permit Annual Report with attachments
Springfield's FY21 TMDL Annual Report

cc: Matt Stouder, Environmental Services Division Director
Priscilla Woolverton, Upper Willamette TMDL Basin Coordinator Western Region
Springfield ESD electronic file

Annual Report

MS4 Phase II General Permit

National Pollutant Discharge Elimination System
MS4 Stormwater Discharge Permit

State of Oregon
Department of
Environmental
Quality

Monitoring Year: FY21
Permit Registrant: City of Springfield
Date Prepared/Submitted: October 1 2021

DEQ File No.: 84048

Certification and Signature
1. Permit Registrant(s): City of Springfield
2. Legally Authorized Representative: Matt Stouder
3. Title: Environmental Services Division Director
4. Email: mstouder@springfield-or.gov
5. Phone: 541-736-1006
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 (40 CFR 122.22(d)).

Matt Stouder
Signature

9/10/21
Date

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Instructions

At least once per year, the permit registrant must evaluate compliance with the requirements of the MS4 Phase II general permit using this Annual Report template. This self-evaluation includes assessment of progress made towards implementing the SWMP control measures in Schedule A, and implementation of actions to comply with any additional requirements identified pursuant to Schedule D.1 (Requirements for Discharges to Impaired Waterbodies).

For each SWMP control measure or activity listed below, please answer all the questions and in the comments field cite any relevant information and/or statistics that helps to illustrate implementation or compliance. If your answer is “No,” in the comments field explain the reasons and outline the anticipated implementation timeline. If the requirement does not apply, explain why it is not applicable in the comments field.

No later than November 1 each year, beginning in 2020, the permit registrant must submit an Annual Report to DEQ. One signed copy and one electronic copy must be submitted to DEQ using the address provided in permit. DEQ can provide an FTP site for submittal of the electronic copy, upon request.

General Information

Registrant Information

6. Permit Registrant(s): City of Springfield		
7. Type(s): ☒ City / ☐ County / ☐ Special District / ☐ Other:		
8. Registrant Type: Existing Registrant: ☒ New Registrant: ☐		
9. Community Type: Large Community: ☒ Small Community: ☐		
10. DEQ Permit No: 84048		
11. EPA File No: ORS084048		
12. Physical Address: 225 5th Street Ste. 101		
City: Springfield	State: OR	Zip: 97477
13. Point of Contact: Sunny Washburn		
Title: Water Resources Supervisor	Email: swashburn@springfield-or.gov	Phone: 541-736-1022
14. Mailing Address (*if different*): same		
City:	State:	Zip:

Municipal Separate Storm Sewer System (MS4) Information

15. Estimate the area in square mileage served by the MS4: square miles: 15.85

16. Estimate the population served by the MS4: 63,000 (U.S. Census estimate)

MS4 Stormwater Discharge Information

Identify the names of all known waters that receive a discharge from your MS4.

Receiving Waterbody	# of Outfalls	Impaired waterbody		Impairment(s)
		303d listed	TMDL issued	
a. McKenzie River		Yes ☒ No ☐	Yes ☒ No ☐	303(d)=DO, TMDL=Bacteria, Temperature, Mercury
b. Willamette River		Yes ☒ No ☐	Yes ☒ No ☐	303(d)=DO, TMDL=Bacteria, Temperature, Mercury
c. Middle Fork Willamette		Yes ☒ No ☐	Yes ☒ No ☐	303(d)=DO, TMDL=Bacteria, Temperature, Mercury
d. South Cedar Creek		Yes ☒ No ☐	Yes ☐ No ☐	Temperature
e. Q Street Floodway		Yes ☐ No ☒	Yes ☐ No ☐	
f. Springfield Mill Race		Yes ☒ No ☐	Yes ☐ No ☐	DO
g. Channel 6		Yes ☐ No ☒	Yes ☐ No ☐	
h. Irving Slough		Yes ☐ No ☒	Yes ☐ No ☐	
i.		Yes ☐ No ☐	Yes ☐ No ☐	
j.		Yes ☐ No ☐	Yes ☐ No ☐	

Coordination Among Registrants and Joint Agreements

Required for permit registrants relying on another entity to satisfy one or more of the requirements of the permit.

17. Is there a joint agreement in place for the implementation of one or more stormwater management program control measures? *Schedule A.2* Yes ☒ No ☐

18. If yes, has there been any change to the joint agreement(s) submitted previously? Yes ☒ No ☐
If yes, include, as an attachment, a summary of the changes.
The summary must identify the other co-registrants/co-implementers or other entities

Stormwater Management Program Information

19. Discuss the status and overall progress of establishing legal authority to control pollutant discharges into and discharges from the MS4 and to implement and enforce the conditions of this permit. *Schedule A.2.c*

Springfield has had coverage under the NPDES permit system since 2007 and has established legal authority under both its Development Code and Municipal Code.

Stormwater Management Program Information

20. Is an updated SWMP Document attached? *Schedule A.2.c*

Yes ☐ No ☒ *(must be submitted with the second Annual Report)*

If necessary, provide an explanation: Issued coverage as of June 1, 2021, new/updated SWMP not fully developed and is due by Nov. 1, 2022

21. Identify the publicly accessible website where the SWMP Document is posted. *Schedule 2.c & A.3.b.ii*

https:// http://www.springfield-or.gov/city/development-public-works/infrastructure-planning/#StormwaterPlanning

If necessary, provide an explanation: Link provided is to the current 2010 SWMP while a new SWMP is being developed for the General Permit.

22. Does the SWMP Document include an implementation schedule for control measures that have yet to be or are partially implemented? *Schedule A.2.c*

Yes ☐ No ☐

If necessary, provide an explanation: N/A - SWMP not developed or submitted as of this report.

23. Describe the method used to gather, track, and use SWMP information to set priorities or assess compliance: *Schedule A.2.d*

Databases and field tablets are used to gather and track program implementation. A Stormwater Log is used along with program and project descriptions to assess compliance with control measure implementation. There is a set of Compliance Books that track overall program(s) implementation in hard copy. Future assessments will include a program assessment/review template to streamline the process.

24. Have adequate finances, staff, equipment and other support capabilities been provided to implement the permit? *Schedule A.2.e*

Yes ☒ No ☐ If necessary, provide an explanation: Currently use a user fee base for stormwater program funding. Future implementation of Post-Construction, Construction, and Operations control measures will require additional resources as permit implementation moves along.

25. During this monitoring year was compliance with the requirements of this permit evaluated? *Schedule B.1*

Yes ☒ No ☐

If necessary, provide an explanation: A compliance review was done to identify program gaps in advance of permit issuance. Springfield's monitoring period for this reporting period is only 30 days, there is not an approved SWMP pertaining to the current permit.

26. During this monitoring year was it determined or reported that discharge from the MS4 caused or contributed to an excursion of an applicable water quality standard? *Schedule A.1.b*

Yes ☐ No ☒

If "Yes", complete Water Quality Standards section (p. 21) of this template.

Stormwater Management Program Control Measures

Public Education and Outreach

27. Provide a brief summary of the ongoing public education and outreach program. *Schedule A.3.a*

Springfield's Public Education 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, EcoBiz, Clean Water University, UpStream Art, Septic System Maintenance, and Little Litter. We either host or participate in regional events such as Earth Day, Home and Garden shows, and the Springfield Clean Up where educational materials are handed out and the public is engaged in conversation.

28. Were the required components in place by the implementation date? *Schedule A.3.a.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2020 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner))* Springfield is on track, a detailed compliance review will be completed in the next FY to determine any program gaps.

29. Provide the number of education and outreach activities conducted: *Schedule A.3.a.iii*

During this reporting year: *8 of which 6 included people from the UTZ*

30. During the permit term: *same as above*

If necessary, provide an explanation: Reporting year is 30 days and permit term is 30 days as of this report. outreach activities included: routine educational material distribution (postcards, brochures, etc.), at the Olympic Trials and at businesses, Council updates on stormwater programs, Clean Water Business outreach, EcoBiz outreach, social media postings, Canines for Clean Water calendar contest, and year-round website posting of educational materials that include construction site educational materials.

31. Indicate target audiences addressed during this reporting year: *Schedule A.3.a.iv*

- ☒ General public, homeowners, homeowner association, schoolchildren, and businesses
- ☒ Local elected officials, land use planners and engineers
- ☒ Construction site operators

32. Have each target audience been addressed during the permit term? *Schedule A.3.a.iv*

Yes ☐ No ☒ Reporting year is 30 days and permit term is 30 days as of this report.

33. Indicate target topics addressed during this reporting year: *Schedule A.3.a.iv*

- ☒ Impacts of illicit discharges on receiving waters and how to report them
- ☒ Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts
- ☒ BMPs for proper use, application and storage of pesticides and fertilizer (available on City webpage)
- ☒ BMPs for litter and trash control
- ☐ BMPs for recycling programs
- ☒ BMPs for power washing, carpet cleaning and auto repair and maintenance
- ☐ Low impact development/green infrastructure
- ☒ Information pertaining to maintenance of septic systems
- ☒ Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife
- ☐ Other:

34. Describe the types of educational messages or activities distributed and/or offered during this reporting year. *Schedule A.3.a.iii. Program outreach efforts include printed material distribution, website materials available for download, signage, events, social media postings, on-line education classes, online events (COVID), Council Briefing Memos, and targeted business mailings.*

35. Was outreach to construction site operators working within your community offered during this reporting year? *Schedule A.3.a.v*

Yes ☒ No ☐

36. Total number during the permit term: Factsheets are available on City website year-round.

37. Identify and describe the assessment/evaluation of, at least, one education and outreach activity that occurred during this reporting year. Include the assessment process or metric for evaluation, and why this activity was considered successful. *Schedule A.3.a.vi:* The reporting period for Springfield for this annual report is a 30-day period; the Water Quality Facility Operation and Maintenance postcard was chosen for this assessment. Postcards were sent to facility owners reminding them to do routine maintenance activities on their facilities, perform inspections, have good vegetation coverage, and not to use herbicides in them. It provides City contact information, directs them to the City website and reminds them to clean out their structures like catch basins annually. We developed a template that is used to assess activities; see attachment: Public Education Assessment.

38. Will the assessment be used to inform future stormwater education and outreach efforts? *Schedule A.3.a.vi*

Yes ☒ No ☐

39. Provide an explanation: Yes, the assessment should draw a conclusion as to if the program efforts were successful, if not, implement adaptive management and redirect efforts. After the assessment, program staff will discuss the results. In this assessment the conclusion is that it is a very effective way to reach a large number of people and that the practice will continue into the next year. See the assessment attached for more details.

Public Involvement and Participation

40. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.b*

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.

41. Were the required components in place by the implementation date? *Schedule A.3.b.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2020 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)* Springfield is on track, a compliance review will be completed in the next FY to determine any gaps.

42. Is the SWMP Document posted on a publicly accessible website? *Schedule A.3.b.ii*

Yes ☒ No ☐ Our current SWMP and annual report is posted

43. Was the publicly accessible website updated during this reporting year? *Schedule A.3.b.ii*

Yes ☒ No ☐

If necessary, provide an explanation:

The reporting year is a 30-day period. We have ongoing updates that occur constantly that include everything from updating reports, plans, GIS mapping, education material updates, public events, and contact information.

44. Does the publicly accessible website include illicit discharge complaint/reporting information or procedures? *Schedule A.3.b.ii.A*

Yes ☒ No ☐

If necessary, provide an explanation:

We have on-line reporting on the City webpage, and a reporting hotline by phone.

45. Does the publicly accessible website include draft documents issued for public comment, final reports, plans and other official SWMP policy documents? *Schedule A.3.b.ii.B*

Yes ☒ No ☐

If necessary, provide an explanation:

46. Does the publicly accessible website include links to all ordinances, policies and/or guidance documents related to the construction and post-construction stormwater management control programs, including education, training, licensing, and permitting? *Schedule A.3.b.ii.C*

Yes ☒ No ☐

If necessary, provide an explanation:

47. Does the publicly accessible website include contact information for relevant staff, including phone numbers, mailing addresses and email addresses? *Schedule A.3.b.ii.D*

Yes ☒ No ☐

If necessary, provide an explanation:

48. During this reporting year, was a stewardship opportunity created or partnered with another entity? *Schedule A.3.b.iii*

Yes ☐ No ☒

If "Yes", summarize the stewardship opportunity(s).

No due to COVID-19 closures and this reporting period being only 30 days. We did have Stream Team events during the actual FY of 2021, just not in June. Stream Team, the Urban Waters program, Clean Water Biz, and EcoBiz are our primary programs. Stream Team engages volunteers to plant vegetation, remove invasive vegetation, and pickup garbage along urban streams and water quality facilities. The Urban Waters and Wildlife Program engages business owners to install volunteer stormwater facilities on their property and to continue to provide O&M for the facility. Clean Water Biz and EcoBiz both engage business owners to become clean water certified based on implementation and management of volunteer pollution prevention practices.

Illicit Discharge Detection and Elimination

49. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.c*

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 believe that we are meeting the current MS4 General Permit conditions; a compliance review will be completed in the next FY to determine any gaps.

50. Were the required components in place by the implementation date? *Schedule A.3.c.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2022 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)* . We believe that we are meeting the current MS4 General Permit conditions; a compliance review will be completed in the next FY to determine any gaps.

51. Is the MS4 map(s) current? *Schedule A.3.c.ii.A*

Yes ☒ No ☐

52. Describe the MS4 map(s) format(s):

Springfield has a digital infrastructure mapping system and is available on-line. Updates are ongoing as new development occurs. Some attributes are being updated to include additional permit listed attributes such as receiving river. ArcGIS ESRI based standard mapping with infrastructure layers.

53. Is the MS4 map(s) included as attachment? Yes ☐ No ☒

Or are the digital shapefiles available for electronic submittal? Yes ☒ No ☐

(Implementation date: Feb. 28, 2022 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

If necessary, provide an explanation: Springfield is on track, a compliance review will be completed in the next FY to determine any gaps. MS4 map submittal is not required as of this report. Electronic submittal must be requested in detail by DEQ and is provided by our Information Technology Department.

54. Is the digital inventory of all known outfalls, with the associated receiving waterbody current? *Schedule A.3.c.ii.B*

Yes ☒ No ☐

If necessary, provide an explanation:
Fine tuning and verification are currently taking place.

55. Indicate if the following features are included on your MS4 map:
- ☒ Location of all known outfalls, including the requirements in *Schedule A.3.c.ii.B*
- ☒ Stormwater collection and conveyance system, including the requirements in *Schedule A.3.c.ii.C*
- ☒ Stormwater structural controls, including the requirements in *Schedule A.3.c.ii.C*
- ☐ Location of known chronic discharges *Schedule A.3.c.ii.D*

If necessary, provide an explanation:
Currently we do not have any known chronic discharges as all illicit discharges are mediated upon discovery. 1200z industrial site outfalls are mapped but are under the discharge approval and authorization of the DEQ, thus not considered chronic illicit discharges.

56. Have non-stormwater discharges into the MS4 been prohibited through enforcement of an ordinance or other regulatory mechanism? *Schedule A.3.c.iii*

Yes ☒ No ☐

If necessary, provide an explanation: Municipal Code 4.370 and 4.372

57. Indicate which of the following have an ordinance or other regulatory mechanism to prohibit discharge to the MS4: *Schedule A.3.c.iii*
- ☒ Septic, sewage, and dumping or disposal of liquids or materials other than stormwater into the MS4
- ☒ Discharges of washwater resulting from the hosing or cleaning of gas stations, auto repair garages, or other types of automotive services facilities
- ☒ Discharges resulting from the cleaning, repair, or maintenance of any type of equipment, machinery, or facility, including motor vehicles, cement-related equipment, and port-a-potty servicing, etc.
- ☒ Discharges of washwater from mobile operations, such as mobile automobile or truck washing, steam cleaning, power washing, and carpet cleaning, etc.
- ☒ Discharges of washwater from the cleaning or hosing of impervious surfaces in municipal, industrial, commercial, or residential areas (including parking lots, streets, sidewalks, driveways, patios, plazas, work yards and outdoor eating or drinking areas, etc.) where detergents are used and spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed)
- ☒ Discharges of runoff from material storage areas, which contain chemicals, fuels, grease, oil, or other hazardous materials from material storage areas
- ☒ Discharges of pool or fountain water containing chlorine, biocides, or other chemicals; discharges of pool or fountain filter backwash water
- ☒ Discharges of sediment, unhardened concrete, pet waste, vegetation clippings, or other landscape or construction-related wastes
- ☒ Discharges of trash, paints, stains, resins, or other household hazardous wastes
- ☒ Discharges of food-related wastes (grease, restaurant kitchen mat and trash bin washwater, etc.)

If necessary, provide an explanation:

58. Is the written escalating enforcement and response procedure included as an attachment? *Schedule A.3.c.iv*

Yes ☐ No ☒

(For Existing Registrant must be submitted with the third Annual Report, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

If necessary, provide an explanation: We have written escalation enforcement procedures, but submittal is not required at this time.

59. Is there a phone number, webpage, and/or other communication channel publicized for the public use to report illicit discharges? *Schedule A.3.c.v.A*
- ☒ Phone number(s)

☒ Webpage(s)
☒ Other communication channels
If necessary, provide an explanation: All printed educational materials and signage has reporting information (e-mail, webpage, and phone number).

60. Provide the number of complaints received during this reporting year. *Schedule A.3.c.v.D*
Number: 5 *(complaints related to IDDE)*

61. On average, how long did it take to respond to complaints? *Schedule A.3.c.v.B*
In working days:

Response to complaint	Inspection to resolution
17th to 17th = 1 working day	17th to 18th = 1 working day
17th to 17th = 1 working day	17th to 17th = 1 working day
14th to 22nd = 6 working days	22nd to July 6 = 10 working days
12th to 15th = 2 working days	15th to 17th = 2 working days
7th to 8th = 1 working day	8th to 8th = 1 working day

Total of 11 working days to respond to 5 incidents = average of 2.2 working days
Total of 15 working days to resolve 5 incidents from inspection to resolution = average of 3 working days

It should be noted that this kind of information is difficult to track as the totaling is required by working days, had to be hand counted, and average calculated by hand. This will present a problem to count for the full year next reporting year. Even though Springfield has a tracking database for illicit discharges this type of query is not built into the system.

62. Provide the number of complaints that included notification of the Oregon Emergency Response System during this reporting year. *Schedule A.3.c.v.B*
Number of notification: 0

63. Provide the number of complaints where staff performed an investigation during this reporting year. *Schedule A.3.c.v*
Number: 5 *(investigations related to IDDE)*

64. On average, how long did it take to conduct an initial investigation? *Schedule A.3.c.v.B*
In working days: 11 working days / 5 calls = 2.2 average (see question #60 above – response to complaint)

65. Provide the number of illicit discharges discovered and eliminated during this reporting year. *Schedule A.3.c.v*
Number: 5

66. On average, how long did it take to eliminate an illicit discharge? *Schedule A.3.c.v.B*
In working days: 3 working days on average (see question #60 above – inspection to resolution)

67. Provide the number times escalating enforcement procedure was used to eliminate illicit discharge during this reporting year. *Schedule A.3.c.v.D*
Number of times: *Not sure what DEQ wants here as section 3.c.v.D is complaint tracking. If this should be section 3.iv enforcement procedures, then the matrix was not used as all incidents were resolved in the allotted timeframe.*

Do any of the illicit discharges involve the repair or replacement of the wastewater and/or storm sewer conveyance systems? *Schedule A.3.c.v.B*

Yes ☐ No ☒ NA ☐

If necessary, provide an explanation: A.3.c.v.B is for public systems, the 5 incidents were all private.

68. Provide the number of illicit discharges that were referred to another entity during this reporting year. *Schedule A.3.c.v.C*
Number: 0

69. On average, how long did it take to notify the entity(s)?
In working days: N/A if necessary, provide an explanation:

70. Indicate which of the following are included in the complaints or reports tracking documentation: *Schedule A.3.c.v.D*
    - ☒ Date the complaint was received and, if available, the complainant's name and contact information
    - ☒ Name of staff responding to the complaint
    - ☒ Date the investigation was initiated
    - ☒ The outcome of the staff investigation
    - ☒ Corrective action(s) taken to eliminate the illicit discharge
    - ☒ The responsible party for the corrective action(s)
    - ☒ The status of enforcement procedure(s), when necessary
    - ☒ The date the corrective action(s) was completed and staff who evaluated final compliance

    If necessary, provide an explanation:

71. Provide percentage of outfalls inspected. *Schedule A.3.c.vi.A/B*
    Known outfalls screened this reporting year: *0*

72. Known outfalls screened during the permit term: *0*

    If necessary, provide an explanation: N/A this report period

73. Provide percentage of outfalls inspected as part of field screening of priority location. *Schedule A.3.c.vi.C*
    Priority location outfalls screened this reporting year: *N/A*

74. Priority location outfalls screened during the permit term: *N/A*

    If necessary, provide an explanation: Reporting period is 30 days, permit term has been 30 days.

75. Indicate which of the following dry-weather field screening activities have been performed in the last year: *Schedule A.3.c.vi*
    - ☐ General observation
    - ☐ Field Screening and Analysis
    - ☐ Pollutant Parameter Action Levels
    - ☐ Laboratory Analysis

    If necessary, provide an explanation: N/A - program in development - reporting period is 30 days, permit term has been 30 days.

76. If flow is observed and the source is unknown, provide a brief description of the field investigation and analysis process. *Schedule A.3.c.vi.D-G*
    N/A

77. Have pollutant parameter action levels been established and are they included as an attachment? *Schedule A.3.c.vi.F*

    Yes ☒ No ☐

    (For Existing Registrant must be submitted with the third Annual Report. New Registrants must submit by September 1, 2023 and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner))

    If necessary, provide an explanation: "Draft" Pollutant Action Level list has been developed. Springfield has been using state standards.

78. Are all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 appropriately trained to conduct such activities? *Schedule A.3.c.vii*

    Yes ☒ No ☐

    If necessary, provide an explanation:

79. Are all new staff working to implement the IDDE program trained within 30 days of their assignment to this program*? Schedule A.3.c.vii*

    Yes ☒ No ☐

    If necessary, provide an explanation:

Construction Site Runoff Control

80. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.d*

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; a compliance review was started and will be completed in the next FY to determine any gaps.

81. Were the required components in place by the implementation date? *Schedule A.3.d.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2023 for Existing Registrants, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)*

We believe that we are meeting the current MS4 General Permit conditions; a compliance review was started and will be completed in the next FY to determine any gaps; specifically, the section that states that we continue to implement our existing program as we develop and implement the requirements of A.3.d.

82. Do ordinances or other regulatory mechanisms require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects? *Schedule A.3.d.ii*

Yes ☒ No ☐ NA ☐

If necessary, provide an explanation:

83. Indicate the minimum land disturbance where construction site operators are required to complete and implement an Erosion and Sediment Control Plan (ESCP) for construction project sites: *Schedule A.3.d.ii*

In square feet or portion of an acre: 50 cubic yards of land disturbance or 500 square feet when located in a sensitive area ft^2 ☐, acres ☐

If necessary, provide an explanation: We use the 50 cubic yard threshold, along with the "intent to support a structure" clause.

84. For construction projects that disturb one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres), provide a brief description how these projects are referred to DEQ or the appropriate DEQ agent, to obtain a NPDES Construction Stormwater General Permit. *Schedule A.3.d.iii.*

1200-CN provides automatic coverage for sites between one and five acres of disturbance when the registrant obtains an LDAP. An LDAP will not be issued for sites over five acres until 1200-C registration is complete. 1200-CN permit recently out for public review - status unknown currently.

85. Provide the written specifications that address the proper installation and maintenance of such controls during all phases of construction activity as an attachment *Schedule A.3.d.iv*

Attached: Yes ☒ No ☐

If necessary, provide an explanation: EDSPM, LDAP Application, LDAP Short Form, Factsheets. Springfield has until February 28, 2024 to address any gaps if our current specifications are not in compliance with permit language.

86. Provide the Erosion and Sediment Control Plan template as an attachment. *Schedule A.3.d.iv.A*

Attached: Yes ☒ No ☐

If necessary, provide an explanation: EDSPM, LDAP Application, LDAP Short Form, Factsheets. Springfield has until February 28, 2024 to address any gaps if our current specifications are not in compliance with permit language.

87. Indicate which of the following are required for qualifying construction projects: *Schedule A.3.d.iv*

☒ Site operator required to complete a ESCP template or worksheet prior to beginning construction/land disturbance

☒ Site operator required to keep the ESCP on site
☒ Site operator required to maintain and update the ESCP as site conditions change, or as needed.
☒ Site operator required to provide the ESCP to the permit registrant, DEQ, or another administrating entity
If necessary, provide an explanation:

88. ESCPs [from construction projects that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres)] are reviewed using a checklist or similar document to determine compliance. *Schedule A.3.d.v*

Yes ☒ No ☐

89. Provide the ESCP review template or checklist as an attachment. *Schedule A.3.d.v*
Attached: Yes ☐ No ☒ Springfield is not required to provide the check list to the DEQ at this time under A.3.d.v.

90. Indicate the minimum land disturbance where you require the ESCP to be reviewed, if different than one acre:
ft^2 ☐, acres ☐
If necessary, provide an explanation:
Sites disturbing more than one acre require a reviewed and approved ESCP. Sites less than one acre but part of a greater common plan of development require either a site specific ESCP for hillside lots and/or lots that impact sensitive areas, or the prescriptive short form template plan for flat lots that do not impact sensitive areas.

91. All construction projects [that will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres)] are expected or scheduled to be inspected at least once per permit term. *Schedule A.3.d.vi.A.1*
Indicate the number of inspections completed to comply with this requirement during this reporting year: 37 routine, 4 initial, 9 final
Indicate the number of inspections completed to comply with this requirement during the permit term: 37 routine, 4 initial, 9 final
If necessary, provide an explanation:

92. Are construction projects with visible sediment in stormwater/dewatering discharge or when a complaint is received inspected? *Schedule A.3.d.vi.A.2*

Yes ☒ No ☐

93. Indicate number of projects that were inspected based on this inspection trigger: 0
If necessary, provide an explanation:

94. Indicate the total number of construction projects that were inspected this monitoring year: 50
95. Indicate the total number of construction projects that were inspected during the permit term: 50

96. Indicate which of the following are documented during an inspection: *Schedule A.3.d.vi.B*
☒ That the ESCP is reviewed to determine if the described
☒ Control measures were installed, implemented, and maintained appropriately
☒ Assessment of the site's compliance with the ordinances or requirements
☒ Visual observation of any existing or potential non-stormwater discharges, illicit connections, and/or discharge of pollutants from the site
☒ Recommendations to the construction site operator for follow-up
☒ Education or instruction provided to the site operator related to stormwater pollution prevention practices
If necessary, provide an explanation:

97. If available, provide a copy of the written or electronic inspection report form. *Schedule A.3.d.vi.B*

Attached: Yes ☒ No ☐ Our system is in electronic format and stored in a digital archive. A pdf of the electronic form is included in the attachments.

98. For Existing Large Communities: Indicate the number of new construction projects inspected that disturb less one acre during this monitoring year. Is this number at least 25% of the qualifying new construction sites? *Schedule A.3.d.vi.C*
If necessary, provide an explanation: 50 – yes – 100%

99. Provide the written escalating enforcement and response procedure as an attachment. *Schedule A.3.d.vii*

Yes ☐ No ☒

(For Existing Registrant must be submitted with the third Annual Report. Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner)

If necessary, provide an explanation: We have escalating enforcement and response procedures in place and believe we meet the General Permit conditions; a compliance review will be completed in the next FY to determine any gaps. The escalating enforcement and response procedures will be submitted by the 3rd annual report.

100. Was the escalating enforcement procedure used to achieve compliance at any construction projects? *Schedule A.3.d.vii*

Yes ☐ No ☒

Indicate number of times during this reporting year:0

101. Indicate number of times during the permit term: 0

If necessary, provide an explanation:

102. Were all persons responsible for ESCP reviews, site inspections, and enforcement appropriately trained to conduct such activities? *Schedule A.3.d.viii*

Yes ☒ No ☐

If necessary, provide an explanation:

CESCL Certification is held for both ESC staffers.

103. Were all new staff working to implement the construction site runoff control program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.d.viii*

Yes ☒ No ☐ There were no new staff hired; current staff have maintained ongoing certification.

Post-Construction Site Runoff for New Development and Redevelopment

104. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.e*

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, design manual, a tracking system for development and inventory, site inspection and enforcement, and a plan review process. We have had a Water Quality Faculty Management Program for both public and private facilities in place since 2010 that provides education and enforcement of water quality maintenance to facility owners/managers. This program is documented and has guidance manuals for implementation. We have facility owner educational material available in hard copy and on our website.

105. Were the required components in place by the implementation date? *Schedule A.3.e.i*

Yes ☐ No ☒ *((Implementation date: Feb. 28, 2023 for Existing Registrant, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner) Springfield's development code will need to be reviewed and updated to meet the new treatment, retention, and off-site mitigation requirements. This will also require a review and update of our design standards.*

106. For projects creating or replacing impervious area, indicate the area (or threshold) where the site is required to implement the post-construction site runoff program requirements: *Schedule A.3.e.ii*

In square feet: 1000 ft^2 If necessary, provide an explanation: Currently this threshold is not applied in the same manner as listed in the permit. Does not apply to all impervious surfaces as defined in the general permit that will be required to meet treatment. Example is that we currently do not require a 1000 sq.ft. residential addition (stand-alone) to meet treatment requirements.

We have thresholds at 3 different levels:

- 500 sq.ft. (used for parking lots – 100% treatment unless under 500 sq.ft.)
- 1,000 sq.ft. (requires a site plan and facility design w/stormwater controls, meet pre-development, O&M))
- 5,000 sq.ft. (requires treatment, facility design (same as 1000 sq.ft.), as well as a stormwater study)

107. Indicate which of the following are required at qualifying sites: *Schedule A.3.e.ii*

☒ The use of structural stormwater controls

☒ A site-specific stormwater management approach that targets natural surface or predevelopment hydrological function through the installation and long-term operation and maintenance of stormwater controls

☒ Long-term O&M of stormwater controls at project sites that are under the ownership of a private entity

If necessary, provide an explanation:

108. Were ordinance(s), code(s) and development standards reviewed to identify, minimize or eliminate barriers that inhibit design and implementation techniques intended to minimize impervious surfaces and reduce stormwater runoff? *Schedule A.3.e.iii*

Yes ☒ No ☐

109. If barriers were identified or if necessary, provide an explanation: This activity took place while under the Individual Permit coverage.

110. Provide an explanation of the timeline for removal of barriers or if removal is outside your authority:
N/A

111. Indicate which of the following technical standards are used to determine the retention requirement: *Schedule A.3.e.iv.A*

☐ Volume-based method

☒ Storm event percentile-based method

☐ Annual average runoff-based method

If necessary, provide an explanation: No increase from the existing condition is allowed; the 25 yr storm is used. This may need to be revised upon implementation of the new treatment standard.

112. For projects that are unable to meet the retention requirement, is the remainder of the rainfall/runoff treated prior to discharge with a structural stormwater control? *Schedule A.3.e.iv.B*

Yes ☒ No ☐

113. Was the stormwater structural control designed to remove, at minimum, 80 percent of the total suspended solids?

Yes ☐ No ☒

If necessary, provide an explanation: The permit does not require 80% removal of TSS, it requires the registrant to set upper and lower bounds for stormwater controls that to treat TSS: "*stormwater structural control must be designed to remove a defined percentage of total suspended solids and may include an upper and lower bound to their treatment requirement that reflect the practical limitation of an engineered control*". The permit uses 80% as an example. Springfield will be reviewing its treatment standards and if needed, making updates by Feb. 28, 2024.

114. Are the allowable structural stormwater controls and specifications available for review? *Schedule A.3.e.iv.C*

Yes ☒ No ☐

115. Indicate if they are attached or the location where they can be viewed:

Attached ☐

Location: Spfld. Engineering and Design Standards and Procedures Manual

And Eugene Stormwater Management Manual

If necessary, provide an explanation: Springfield points to the Eugene Stormwater Management Manual for our design standards for post-construction controls. Links provided above.

116. Have alternatives for projects complying with the retention requirement been approved? *Schedule A.3.e.iv.D*

Yes ☐ No ☒

117. If yes, are the written technical justifications evaluated? *Schedule A.3.e.iv.D*

Yes ☐ No ☐ N/A

118. Provide a brief description of the factors of technical infeasibility or site constraints that prevented the on-site management of the runoff amount stipulated in the stormwater retention requirement or a portion thereof. *Schedule A.3.e.iv.D*

If necessary, provide an explanation: Springfield will need to make code and/or design standard changes to incorporate the changes in the retention standards and required offsite mitigation options as they differ from previous NPDES permit requirements. This change is not required until Feb. 28, 2024 for Springfield.

119. Before the allowance of alternative compliance, were mitigation options established? *Schedule A.3.e.iv.D*

Yes ☐ No ☐

If necessary, provide an explanation: N/A

120. If applicable, indicate which of the following mitigation options have been used and provide a narrative description of the implementation of the mitigation option? *Schedule A.3.e.iv.D*

☐ Off-Site Mitigation
☐ Off-Site Groundwater Replenishment Projects

If necessary, provide an explanation: N/A

121. Was a procedure developed for the review and approval of structural stormwater control plans for new development and redevelopment projects? *Schedule A.3.e.v*

Yes ☒ No ☐

If necessary, provide an explanation: Springfield currently has a plan review process in place that includes stormwater control review.

122. Indicate the minimum land disturbance or creation of new impervious area where plans are required to be reviewed: 1000 ft^2 ☐, acres ☐ of land disturbance ☐ creation of new impervious area ☒
See question 106 above. Depends on what type of activity is being done. A driveway would trigger a plan review were as a roof-top addition may not.

123. Are all sites that use alternative compliance to meet the retention requirement reviewed?

Yes ☒ No ☐

If necessary, provide an explanation: Currently, if a site cannot meet the existing post-construction requirements due to site constraints, developers are allowed to provide alternative compliance such as wetland enhancement, or a treatment facility at an offsite location to meet the current standards.

124. Indicate if an inventory and implementation strategy is used to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv of the permit? *Schedule A.3.e.vi*

Yes ☒ No ☐

If necessary, provide an explanation: There has been a Water Quality Facility Management Program in place since 2010 where staff inventory and inspect stormwater facilities. Our design standards which incorporated the O&M requirements and facility maintenance agreements have been in place since 2002; updated in 2006 and 2011.

125. Indicate which of the following strategies have been developed to ensure that all stormwater controls are operated and maintained to meet the site performance standard in Schedule A.3.e.iv. *Schedule A.3.e.vi*

☒ Legal authority to inspect and require effective operation and maintenance of privately owned and operated stormwater controls
☒ Inspection procedures and an inspection schedule to ensure compliance with the O&M requirements of each stormwater control operated by the permit registrant and by other private entities
☒ A tracking mechanism for documenting inspections and the O&M requirements for each stormwater control
☒ Reporting requirements for privately owned and operated stormwater controls that document compliance with the O&M requirement in Schedule A.3.f.

If necessary, provide an explanation:

126. Are the location of all public and private stormwater controls installed during this permit term documented on the MS4 Map? *Schedule A.3.e.vi*

Yes ☒ No ☐

If necessary, provide an explanation: Private facilities are mapped (inventoried) only after the development application has closed or is finalized. Public facilities are mapped after they have been accepted by Council and the warranty period is up. This typically means that facilities are inventoried about two to three years after construction.

127. Were all persons responsible for performing post-construction runoff site plan reviews, administrating the alternative compliance program, or performing O&M practices or evaluating compliance with long-term O&M requirements appropriately trained to conduct such activities? *Schedule A.3.e.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

128. Were all new staff working to implement the post-construction site runoff for new development and redevelopment program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.e.vii*

Yes ☒ No ☐

If necessary, provide an explanation:

Pollution Prevention and Good Housekeeping for Municipal Operations

129. Provide a brief summary of the overall progress towards implementation of this control measure. *Schedule A.3.f*

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 determination 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 currently operational strategies that the City implements.

130. Were the required components in place by the implementation date? *Schedule A.3.f.i*

Yes ☒ No ☐ *(Implementation date: Feb. 28, 2022 for Existing Registrants, Sept. 1, 2023 for New Registrants and February 28, 2024 for Albany, Corvallis, Millersburg, Springfield and Turner))*

131. Were O&M strategies for existing controls developed for both permit registrant-owned controls and controls owned and operated by another entity discharging to the MS4? *Schedule A.3.f.ii*

Yes ☒ No ☐ N/A ☐

If necessary, provide an explanation: Springfield has a Water Quality Facility Management Program that includes both private and public facilities.

132. Indicate the percentage of catch basins inspected/cleaned: *Schedule A.3.f.iii*

Percentage inspected this reporting year: 0 ; Percentage cleaned:

133. If known, estimate of material removed: 0 units

134. Percentage inspected during the permit term: 0 ; Percentage cleaned:

135. If known, estimate of material removed: 0 units

If necessary, provide an explanation: The reporting period for this annual report is a 30-day cycle (June 2021). No routine catch basin cleaning activities occurred in June as this is typically a fall and early winter activity. For the full FY21, we cleaned and inspected 1516 basins and removed 51 tons of material. This currently works out to be 22%. Spfld. is currently re-assessing and updating jurisdictional ownership of catch basins. This will affect the end total for owned and operated. Additionally, it should be noted that as development occurs the total owned and operated changes. This too will affect the percentage. Therefore, calculating a percent of facilities cleaned each year will not represent a true percentage as the total ownership changes each year.

136. Indicate if a catch basin inspection prioritization system and/or an alternate inspection frequency has been established. *Schedule A.3.f.iii*

Yes ☐ No ☒

If necessary, provide an explanation: N/A

137. During the permit term were existing procedures for inspection and maintenance schedules reviewed/updated to ensure pollution prevention and good housekeeping practices were conducted for the following activities? *Schedule A.3.f.iv*

- ☐ Pipe cleaning for stormwater and wastewater conveyance systems
- ☐ Cleaning of culverts conveying stormwater in roadside ditches
- ☐ Ditch maintenance
- ☐ Road and bridge maintenance
- ☐ Road repair and resurfacing including pavement grinding
- ☐ Dust control for roads and municipal construction sites
- ☐ Winter road maintenance, including salt or de-icing storage areas
- ☐ Fleet maintenance and vehicle washing
- ☐ Building and sidewalk maintenance including washing
- ☐ Solid waste transfer and disposal areas
- ☐ Municipal landscape maintenance
- ☐ Material storage and transfer areas, including fertilizer and pesticide, hazardous materials, used oil storage, and fuel
- ☐ Firefighting training activities
- ☐ Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc.

If necessary, provide an explanation: Springfield's reporting period is a 30-day period, no updates were made to the existing BMP Guidance Manuals. We do have guidance manuals in place that address all the subjects listed above, and they are scheduled to be reviewed and updated over the course of the permit term, if needed.

138. Do any permit registrant-owned facilities have coverage under DEQ's 1200-Z Industrial Stormwater Discharge Permit? *Schedule A.3.f.v*

Yes ☐ No ☐ NA ☒

If "Yes", provide DEQ File Number(s):

If necessary, provide an explanation: A 1200z determination was completed in January 2021 (this is the 3rd determination completed over the years). It has been determined that Springfield does not need a 1200z permit at any of its facilities..

139. Are practices in place to reduce the discharge of pollutants to the MS4 associated with the application and storage of pesticides and fertilizers? *Schedule A.3.f.vi*

Yes ☒ No ☐

If necessary, provide an explanation: Pollution Control BMP Guidance Manual for Maintenance Operations (PC BMP Manual)

140. Are methods/practices in place to reduce the discharge of litter within the jurisdiction? *Schedule A.3.f.vii*

Yes ☒ No ☐

If necessary, provide an explanation: Street sweeping, catch basin cleaning, and leaf pick up programs are implemented by Operations. WQF management program, Stream Team, and the Little Litter public outreach program are implemented by Environmental Services in conjunction with Operations and regional partners.

141. Are practices in place to ensure that collected material or pollutants removed in the course of maintenance are managed and disposed of in a manner such as to prevent such pollutants from entering the waters of the state in accordance with state and federal rules? *Schedule A.3.f.viii*

Yes ☒ No ☐

If necessary, provide an explanation: Approved Vactor dump facility and sweeper material bins.

142. Were all persons responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations appropriately trained to conduct such activities? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

143. Were all new staff working to implement the pollution prevention and good housekeeping for municipal operations program appropriately trained within 30 days of their assignment to this program? *Schedule A.3.f.ix*

Yes ☒ No ☐

If necessary, provide an explanation:

Monitoring

If the requirement does not apply, mark "NA" and explain why it does not apply to you in the comments field.

144. Was municipal stormwater monitoring performed at outfall locations, in the receiving waterbody, or to demonstrate compliance with this permit? *Schedule B.3*

Yes ☐ No ☒

145. If "Yes" is the data included in the Annual Report?

Yes ☐ No ☐

If necessary, provide an explanation:

Wood Village Monitoring Requirements

146. Provide a summary of the following to evaluate the control strategies established for the Lower Columbia Slough Phosphate, Lead, and Bacteria TMDLs: *Schedule D.1.b*

Phosphate: N/A

Lead:

Bacteria:

147. Indicate which of the following were completed:

☐ For phosphate, monitor influent and effluent dissolved orthophosphate concentrations and total phosphate concentrations at a representative site in Fairview Lake (Reach 4) and Fairview Creek (Reach 5)
☐ For lead, estimates of the effectiveness of controls to remove TSS
☐ For bacteria, measuring E. coli concentrations and its distribution over flows (for example, flow duration intervals) to demonstrate compliance with E. coli criteria

If necessary, provide an explanation: N/A

Water Quality Standards

148. During this monitoring year was it determined or reported that the MS4 discharge caused or contributed to an exceedance of an applicable water quality standard? *Schedule A.1.b*

Yes ☐ No ☒

If necessary, provide an explanation:

149. How and when did the exceedance of an applicable water quality standard occur? *Schedule A.1.b*

If necessary, provide an explanation: N/A

150. Was the exceedance self-reported or did DEQ send written notification? *Schedule A.1.b*

Self-reported: Yes ☐ No ☐

If necessary, provide an explanation: N/A

151. Within 48 hours was an investigation started into the cause of the water quality exceedance? *Schedule A.1.b.i*

Yes ☐ No ☐

If necessary, provide an explanation: N/A

152. Within 30 days of becoming aware of the exceedance, was DEQ notified in writing, if self-reporting? *Schedule A.1.b.ii*

Yes ☐ No ☐

If necessary, provide an explanation: N/A

153. Within 60 days of becoming aware of or being notified of the exceedance, was a report submitted to DEQ that documents the following: *Schedule A.1.b.iii*

☐ The results of the investigation, including the date the exceedance was discovered
☐ A brief description of the conditions that triggered the exceedance or the cause
☐ Corrective actions taken or planned, including the date corrective action was completed or is expected to be completed

If necessary, provide an explanation: N/A

154. Were the corrective actions implemented in accordance with the schedule approved by DEQ? *Schedule A.1.b*

Yes ☐ No ☐

If necessary, provide an explanation: N/A

155. Provide any additional comments or narrative description, if necessary:

Summary of changes made to the IGA with Lane County:

- Parties: City of Springfield and Lane County.
- City of Springfield provides NPDES Services on behalf of Lane County.
- It is not known if Springfield had submitted a pervious version of the IGA to the DEQ, but over the years there have been many updates made to the IGA for coverage of costs incurred.
- The latest IGA effective January 1, 2020 made changes to include area cost increases for services and to address some of the General Permit requirements that Lane County was subject to at the time.
- The agreement was drafted to incorporate the activities that Springfield could cover while under the Individual Permit and County under the General Permit.
- Services of coverage are to address public education, stewardship, construction, and post-construction control measures.
- Implementation services do not consist of code review or updates, only implementation of existing activities and Codes.
- The current agreement will expire June 30, 2022 after that it is expected that a new agreement will incorporate most General Permit metrics to be implemented within the urban transition zone (the area between City Limits and Urban Growth Boundary) as both parties will have coverage under the same MS4 General Permit.

Annual PE Activity Assessment

Date of Assessment: 7/15/2021

Assessment Staff and Position: Meg Murphy, Environmental Services Analyst; Sunny Washburn, Water Resources Supervisor

Public Education Activity: WQF Maintenance Reminder Postcards

Project Staff: Meg Murphy, Environmental Services Analyst; Brooke Mossefin, Communications

Date of Activity: 6/25/2021 to 6/25/2021

Applicable to TMDL? ☐ **Temperature** ☐ **Bacteria** ☒ **Mercury**

MS4 General Permit Language: Schedule A.3.a. vi. Tracking and Assessment. The permit registrant must track implementation of the Public Education and Outreach requirements. In each corresponding Annual Report, the permit registrant must assess their progress toward implementation of the program, including the evaluation of at least one education and outreach activity corresponding to the reporting timeframe for the associated Annual Report. The assessment(s) should be used inform future stormwater education and outreach efforts to most effectively convey the educational material to the target audience(s).

Permit required activities, audiences, and topics

As required by the MS4 General Permit, Springfield is required to focus its efforts on conveying relevant messages using the Target Topics identified below or stormwater issues of significance in our community:

Target Audience:

1. General public, homeowners, homeowner association, schoolchildren, and businesses (including home-based and mobile business).
2. Local elected officials, land use planners and engineers.
3. Construction site operators (See Schedule A.3.v below).

Target Topics:

1. Impacts of illicit discharges on receiving waters and how to report them.
2. Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts.
3. Best management practices for proper use, application and storage of pesticides and fertilizers.
4. Best management practices for litter and trash control.
5. Best management practices for recycling programs.
6. Best management practices for power washing, carpet cleaning and auto repair and maintenance.
7. Low-impact development/green infrastructure.
8. Septic systems, information pertaining to maintenance of septic systems.
9. Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife.
10. Stormwater issues of significance identified by permit registrant.

Enter activity information

Target Audience (from list)	# 1 - General public, homeowners, homeowner association, schoolchildren, and businesses	***Target Audience Reached? Y=1 N=0***
		1
Target Topics (from list)	# 10 – Water Quality Facility BMPs	

Type of messaging (brochure, social media, utility billing, newsletter, postcard, PSA…)	WQF Postcard	
Type of outreach effort (mailing, event, posting…)	Mailing	
Describe the activity.	Postcards were sent to facility owners reminding them to do routine maintenance activities on their facilities, perform inspections, have good vegetation coverage, and not to use herbicides in them. It provides City contact information, directs them to the City website for more information, and reminds them to clean out their structures like catch basins annually.	
Are we providing information on the potential pollution of the activity?	Yes. Cleaning catch basins and ensuring stormwater facilities are fully vegetated improve the effectiveness of these facilities at removing pollutants from stormwater. .	**Yes=1 N=0** **1**
Are we providing awareness of the direct links between land activities, rainfall-runoff, storm drains, and local water resources?	Yes. We state on the front of the postcard "Maintain Your WQFs so they can effectively remove pollutants from stormwater runoff" and on the back "Your upkeep matters because it keeps Springfield's waterways and water supplies healthy."	**Yes=1 N=0** **1**
Are we providing clear guidance on steps and specific actions that they can take to reduce potential stormwater pollution?	Yes. Clean catch basins. inspect facilities. Ensure vegetation coverage is 90% or better.	**Yes=1 N=0** **1**
Are we providing information on alternative methods and providing resource information?	Yes, postcard directs to the website and also to contact me for plans and information.	**Yes=1 N=0** **1**
Do people ask for information on the subject?	No, no calls this year. Last year there were some calls.	**Yes=1 N=0** **0**
Is the material out of date (appearance, BMPs, phone #, websites, etc…?)	No, material was updated with current branding, web locations, and contact info prior to mailing.	**Yes=0 N=1** **1**

Performance Measurement

Measurement must be included as an integrated component from the outset: goals should be determined in part by what can be measured in both quantitative and qualitative terms, and measurement requirements should be integrated into each component.

Desired outcome1 How many members of each audience do you wish to reach?	150	water quality facility owners
Desired outcome2 What do you want those people to: 1. Know and/or think? 2. Do as a result of the campaign?	1. Be aware that they have a facility on their property and that it requires routine maintenance. Provided tips. 2. Perform annual upkeep on their facility.	

Annual PE Activity Assessment

How will it be measured & benchmark ○ Quantitative measurements: inquiry rates, submissions, attendance, media taken/given away, website visits, volunteer hours. ○ Surveys can be used to capture data such as opinions and perceptions, including perceived value and engagement on the part of participants and perceptions of the program.	Quantitative measurements of how many mailed, returned, requested additional information.
Expected resources	Yearly mailing – 2 staff Printing and postage Inhouse update of material
Systems in place to capture quantitative data.	PE Database

Metrics

Exposure
(number of readers or viewers reported by the media outlet carrying message, readership statistics, views, days in the field, days of event, etc.…

Experience
How they interacted with it, what they thought of it, and what they got out of it. (focus groups, observations, interviews, phone survey).

Number of days material exposed		1	Day
Event days			
People at event			
Total taken/given		150	Mailed
People stopped at booth			
People interacted with			
Total downloads from website			
Any feedback? (positive scale 5-1, 5 being positive)		1	No feedback
Any technical assistance requested because of the type of material or activity? (positive scale 5-1, 5 being positive)		1	No
Total staff effort: (ease of resource scale 5-1, 5 being easy)		5	Easy update, Meg coordinated, SPS printed and mailed. Casey helped create list, Brooke provided some material update along with Meg.
Number of materials taken divided by the days the material was out	150/1 = 150	5	Pieces of material a day 150 per day (positive scale 5-1)
OR - Number of materials taken divided by the number days of the event	not event	0	Pieces of material a day (positive scale 5-1)
Enter more metrics as needed			This is an extra row if needed
Comparable and Percent change - compared to last year: 206 in 2020 Divide the new value by the old value. Multiply by 100 Subtract 100 returns percent change Enter results as a positive scale 5-1, 5 being positive). Enter to the far-right the percent change. Note that some activities may not be comparable to calculate a percent change.			Enter percent change from the table below = -27 % Not comparable to last year - see outcome for description.

Conclusion:

If data from the metrics table did not automatically fill in then right click in the blue box, select "update field" to update a field so it will auto-calculate.

Assessment Outcome	**- Right Click in the blue box and select "update field"**			
Target reached	11			
Potential pollution	1			
Direct links	1			
Clear guidance	11			
Alternative method	1			
Requests	01			
Out of date	11			
Feedback	1			
Assistance request	1			
Staff effort	5			
Exposure Material	5			
Exposure Event	0			
	18	Out of	27	Success scale Highly - - Moderately - - Low - - Failure 27 20 10 0
Percent Change	-27			
Outcome	Even though the percent change is negative, it is due to the fact that more property owners were sent material last year than this year and that type of comparison can't be made in this case. Each year the rotation of facilities is different and that group is targeted for outreach. • All of the people or businesses who own property with a vegetated or structural water quality facility in Springfield are mailed either a postcard or an inspection notice, depending on the maintenance topic of the postcard. Thus, the number of postcards mailed out depends on how many facilities are up for re-inspection in a given year. • A lot of people don't know they have a facility on their property, this works well to inform them. • A lot of people don't know how to maintain or get information, this works well at informing them and provides contact information. • Facilities have been having better ratings due to owners and or maintainers knowing they have a facility. • Easy to update post-cards annually and mail out, not a lot of resources involved.			
Outreach effective?	Yes. The postcard describes at a glance the connection between facility maintenance and water quality in our rivers, streams, and drinking water. It also provides short tips to deal with the most common and important problems that we see in WQFs based on our inspections: lack of vegetation, weeds, and catch basin cleaning. It also tackles another important issue – awareness of property owners that they have one or more WQFs on their property and that they need to inspect them regularly.			
Recommend continuing this outreach?	Yes, the outreach is easy to implement, and a large amount of facility owners can be reached in one process. Staff time is minimal as the material can be generated or updated in house, contact information can be generated in house, and our regional partner helps in the printing and mailing.			

What changes are recommended for the future?	None currently.

Any additional information about the process and results.

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-

MAINTAINING YOUR Water Quality Facility

We're reaching out because you have a water quality facility on your property, that you're responsible for maintaining.

We have information that can help! Your upkeep matters because it keeps Springfield's waterways and water supplies clean and healthy.

One important part of your facility is vegetation. Plantings help remove pollutants from stormwater runoff and their roots help water soak into the soil and prevent flooding. **To help keep our water clean:**

- **Inspect your facilities annually and after heavy rainfall.** Fix any problems and record maintenance activities in a log.
- **Ensure plants cover at least 90% of your facility.** Try to determine the cause of any bare spots, and replant with approved species.
- **Keep an eye out for weeds and hand-remove them.** Learn to identify the plants that are supposed to be in your facility so you can determine which ones are weeds.

DO YOU HAVE A Catch Basin?

These often empty into vegetated water quality facilities or to the public stormwater system, which leads straight to local waterways.

- ***Clean out catch basins at least once per year.***
- ***Replace oil-absorbing media annually.***

SPRINGFIELD OREGON

GROUNDWATER GUARDIAN

To find out more, visit *SpringfieldStreams.org* and click on *Water Quality Facility Management Program*. For information about your facility, or with questions, email *mmurphy@springfield-or.gov*.

City of Springfield
225 Fifth St
Springfield, OR 97477

Help keep our water clean

Maintain your water quality facilities so they can effectively remove pollutants from stormwater runoff.

Turn over for details

Water Quality Facility Management Program

Erosion/Grading Inspection Log

Inspection Date		Inspection Time	
Address			
Permit Number			
Contact		Phone Number	
Email			
Weather			

BMP Status			Deficiencies and/or Violations	
Sediment Fence/Perimeter Measures	OK ☐	NOK ☐	Tracking/Sediment Leaving Site	☐
Inlet Protection	OK ☐	NOK ☐	Pollutant Discharge	☐
Construction Entrance	OK ☐	NOK ☐	Wetland/Easement Disturbance	☐
Soil Coverage	OK ☐	NOK ☐	Unpermitted Tree Removal	☐
Stockpile Coverage	OK ☐	NOK ☐	Improper Concrete Wash-Out	☐
Delineation	OK ☐	NOK ☐	Improper Hazardous Material Storage	☐
Housekeeping	OK ☐	NOK ☐	Missing Spill Kit (if applicable)	☐
Other	OK ☐	NOK ☐	*Provide comments below for any deficiencies recorded*	

Comments

Inspector	

Re-Inspection Schedule	