



Oct 1, 2021

Priscilla Woolverton
Upper Willamette TMDL Basin Coordinator Western Region
Oregon Department of Environmental Quality
165 East 7th Avenue, Suite 100
Eugene, OR 97401-3049

RE: City of Springfield's Twelfth Year TMDL Annual Report 19-20

Dear Priscilla,

Enclosed is Springfield's Twelfth Year TMDL Annual Report for our TMDL implementation Plan dated 2019. It outlines the City's progress toward full implementation of our Plan. This report includes a complete summary of implementation efforts for the reporting period 7-01-2020 through 6-30-2021.

Springfield anticipates continuing forward in our efforts to comply with our approved 2019 TMDL Implementation Plan through the next reporting period. No adaptive management amendments are requested as a part of this annual report. Springfield did include a matrix with proposed MS4 program goals for implementation under the MS4 General Permit in response to the Willamette Basin Mercury Updates.

We look forward to your review and response.

Sincerely,

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

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

cc: Matt Stouder, Springfield Environmental Services Division Director
DEQ MS4 Stormwater Program, Portland OR.
Springfield ESD electronic file

City of Springfield

TMDL Implementation Plan Twelfth Year Annual Report 20-21



Franklin Blvd. Glenwood Planter 2021

Submitted Oct 2021 for July 1, 2020 thru June 30, 2021



Table of Contents

Purpose	1
Background	1
Regulatory Context	2
Reporting Requirements	2
Summary of Work Accomplishments	3
Temperature	3
Bacteria	9
Mercury	13
Adaptive Management Measures	17
Table 1 -TMDL Implementation Tracking Matrix	18
Table 2 – Revised Willamette Basin Mercury TMDL Reporting Matrix	22

Purpose

This document fulfills the requirements for annual reporting of progress towards meeting the long-term goals of the City of Springfield's Total Maximum Daily Load Implementation Plan (TMDL IP), as required by the City's TMDL IP dated June 2019, accepted by the Oregon Department of Environmental Quality (DEQ) June 19, 2019, and provision OAR 340-042-0080 (3) of the Oregon Administrative Rules addressing non-point source pollution.

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

Under its first TMDL, Springfield was required to perform a 5 Year Review Report and submit another 5-year plan to the DEQ by April of 2014. The City drafted and submitted its 2014 TMDL IP and 5 Year Review to the DEQ in March of 2014. The DEQ determined that since Springfield had just submitted the 5 Year Review and its new Plan that it was not necessary to submit an additional Annual Report in 2014. The sixth annual report was submitted in October of 2015, the seventh report in Sept 2016, the eighth report in October 2017, the ninth report in Oct 2018, and the tenth was a 5 Year Review Report submitted August of 2019. The eleventh report was submitted in Oct 2020; this Annual Report is Springfield's twelfth report and covers the time frame from July 1, 2020 to June 30, 2021. The report is due to the Oregon DEQ by November 1st, 2021.

Springfield was issued its MS4 General Permit on June 1, 2021. TMDL pollutants and their waste load allocations (WLA) are part of the MS4 permits best management practices (BMPs) for pollution reduction by using qualitative or quantitative benchmarks. Springfield's 2019 TMDL IP will be incorporated into the proposed General Permit Stormwater Management Plan that will be submitted to DEQ by November 1, 2022. Springfield will continue to submit copies of the TMDL Annual Reports covering the time frame from July 1st to June 30th of each year to the MS4 Stormwater Coordinator. This dual reporting will continue until Springfield is advised otherwise.

Background

The Oregon DEQ set water quality standards to protect waterways in the region for beneficial uses such as domestic drinking water supply, fishing, water contact recreation, fish spawning, and irrigation. Streams, lakes, and rivers that do not meet these standards are included in a list of impaired water bodies. This list, developed in response to Section 303(d) of the Clean Water Act, is referred to as the "303(d) list" and contains the names and descriptions of waterways, or sections of waterways, that have failed to meet state water quality standards for one or more listed pollutants.

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

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

Regulatory Context

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

Reporting Requirements

This Annual Report is required to include the progress and/or status of Springfield’s 2019 TMDL Implementation Plan and its measurable goals. Oregon DEQ refers to this type of monitoring as implementation monitoring and the progress report as an Annual Report. The City of Springfield has chosen to use the **TMDL Implementation Tracking Matrix** as a tool for describing, tracking, and reporting TMDL implementation efforts listed under its Plan.

The Implementation Tracking Matrix (Table 1) will provide information about each strategy, implementation methods, and progress or status in meeting the plan’s goals.

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

The Reporting Matrix to address the Revised Willamette Basin Mercury TMDL (Table 2) provides a summary to demonstrate compliance and status for program implementation to meet the conditions listed in Table 13-11 of the Revised Willamette Basin Mercury TMDL. An updated TMDL plan and implementation matrix for Springfield will be submitted by or before the due date of September 2022.

Springfield was issued its MS4 Phase 2 General Permit June 1, 2021 and will have until February 28, 2024 to implement all the required components of the permit. For FY21, the MS4

General Permit Annual Report is a reporting period of 30 days and does not fully convey compliance and status information, therefore Table 2 was added to report a full FY21.

Springfield's general permit stormwater management plan which identifies measurable goals and timelines is to be submitted to the DEQ by November 1, 2022. Specific sections of Table 2 will identify proposed general permit measurable goals in addition to our current 2019 TMDL IP current goal status.

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

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

Summary of Work Accomplishments

This section is a brief summary of the work that has been done in the reporting period for each of the pollutants. See Table 1 TMDL Implementation Tracking Matrix for completion status.

Temperature:

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

Summary:

- A desktop assessment and a priority list have been completed. This was accomplished in year 1 reporting. This effort is being continued with a channel restoration priority project list and is incorporated into the City CIP process. A review of the assessment and list was completed January 2017 and reported in a previous annual report. Updated Canopy Shade Assessment document and identified next steps for completing a desk-top and field assessment. Identified new areas based on UGB expansion and wetland/riparian inventory.
- Continued work shade planting near waterways. The City hosted 5 Stream Team events which included planting trees and shrubs and cleaning up garbage along waterways and water quality facilities; 806 trees/plants were planted. Due to

COVID-19, planting primarily was completed by City and Willamalane staff with minimal citizen participation.

- The Mill Race Restoration Project Phase 1 is complete. Shade planting was a priority at this site with canopy trees being planted along the channel banks. Phase 2 of the project, the pond/wetland areas, has been completed with canopy trees being planted along the main channel. This project is in the O&M stage with ongoing maintenance and vegetation monitoring. In July, Operations cleared around 20 ac. of invasive plants this reporting cycle.
 - A stormwater treatment park along the north bank of the Mill Race has been completed. This facility also provides education via signage and a trail system. The treatment park enhanced this area greatly by converting an open industrial area full of invasive plants into a natural vegetated and treed facility. Additionally, providing pre-treatment and cooling of industrial and stormwater runoff before it enters the Mill Race. The multi-use path along the Mill Race and Stormwater Treatment Park is completed. This trail system runs along the top of bank of the Mill Race and begins at the treatment park; it too had native vegetation and trees added in place of the invasive species removed. Educational interpretive signs were previously installed.
 - The Channel 6 Stormwater Master Plan design and construction work is on hold pending the competition of a street bond project. Study work is completed. This project will incorporate a series of treatment swales, invasive plant removal, and native vegetation and trees planted.
 - An intern finished drafting an enhancement plan and design work for the 72nd Street Channel. This site is ready for shading, vegetation, wetland, and flow improvements.
 - In the newly expanded UGB areas, natural resource inventories were conducted in FY21, including identifying needs and implementing a request for proposal (RFP) process for wetland and natural resource area updates to the Local Wetlands Inventory (LWI). This project is supported by a grant. Work is in the review and finalization stage.
 - Staff continued to work with the Long Tom Watershed Council and other agencies in the Urban Waters & Wildlife Partnership and has since expanded its efforts to include additional partners such as SUB and EWEB. This partnership focuses on private stormwater retrofits and enhancements. Work on drafting agreements and grant submittals took place this reporting period.
- T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement
 1. Additional review of Development Code for parking lot, streetscape, vegetation management, setbacks and buffers, and retrofit practices; review development code and amend if appropriate.

2. Mill Race restoration management and enhancement; continue to identify discrete projects that can advance overall restoration.

Summary:

- The major review of the Springfield Development Code to include new technology, designs, and ideas for improving water quality was completed under the first TMDL Plan. Low Impact Development Approaches, Engineering Design Standards, and the Development Code continue to be reviewed and improved upon to optimize shading, address pervious pavements, and stormwater discharge alternatives. A review of existing codes and standards pertaining to riparian areas, parking lots, and streetscapes was conducted in February and March of 2021 and found to be acceptable and in compliance at this time. If updates are needed, they will occur in 2022.
- From January – June 2021 there has been a code/review and update effort for housing and land use planning, as well as some Glenwood code adjustments. Some stormwater codes are being looked at in those processes as well. MS4 General Permit language is being reviewed at the same time to incorporate any needed language changes.
- A review of the Springfield’s Engineering Design Standards and Procedures Manual for chapters pertaining to water quality facilities, water quantity, facility design, vegetation and tree standards, and riparian enhancement, was completed in March 2021. Any updates identified through this process will be completed by July 2022. Litigation has concluded and Springfield’s MS4 Permit was issued June 1, 2021. We plan on doing compliance reviews in 2021 to identify any gaps additional gaps.
- Staff continues to work with developers, through the development review process, on providing large canopy trees, maximizing vegetative treatment and/or incorporating additional vegetation into planned project sites.
- A new streetscape project called the Virginia Daisy Bikeway is currently in phase 2; design work and phase 1 was completed during this reporting period. This project incorporated a skinny green street design with trees, swales, and a bike path.
- As mentioned above, the Mill Race Restoration Project is in the O&M stage with ongoing maintenance and vegetation monitoring. Over 20 acres of invasive plant removal were cleared. Work occurred between July 2020 and August 2020.
- Updated the Mill Race Restoration Project List - “Project Wish List” for areas along the MR that can benefit from shade and vegetation enhancement projects. Gathered input from Engineering, Operations, and Willamalane.
- Willamalane prepared the Georgia Pacific Natural Area Master Plan, a plan that will address opportunities for habitat restoration and recreation, with focus on riparian areas and trail networks. The City reviewed and offered recommendations to minimize the impact of trails and the temporary equestrian use on water quality, including buffering trails with native vegetation, installing bridges for horses, etc. The City is part owner of the property and in order to

access the area, City-owned property would be crossed by the public. Some of these crossings would be foot and horse bridge and bank crossings over and through the Mill Race. Activities such as horse trails and pedestrian bike and foot trails can have a large impact to vegetation and water quality. An IGA was setup between partners to allow temporary horse use of the area.

- Phase 1 of the Franklin Boulevard Redevelopment Project was completed. This redevelopment included re-landscaping an industrial corridor with vegetated round-a-bouts, vegetated park strips and medians with trees, and water quality facilities in and along the corridor. It includes three large infiltration swales, numerous other smaller street side infiltration swales, and pervious pavement. Work continues with design, construction funding, and grant applications for Phase 2 work.

- T3 - Manage Industrial Warm Water Discharges

1. Identify industries with stormwater discharges and provide technical assistance to reduce warmwater discharges and improve stormwater treatment where opportunities exist.

Summary:

- Staff continues to review 1200z permits and Pollution Control Plans for industries in Springfield's jurisdiction when they become renewed or issued; there were no new or renewed 1200z this reporting period. Staff reviewed and updated our tracking database for the 22 industries with 1200z permits that are in our jurisdiction.
- The Water Quality Facility Management Program continued to inventory, inspect, and enforce compliance for both public and private sites. Some of the private sites are industrial sites with warm water discharges; this program ensures compliance with water quality facility maintenance and checks for illicit discharges, including warm water discharges, by visiting these sites on a routine basis and noting any warm water discharges. 150 maintenance reminder postcards were sent out, 57 new facilities inventoried, 452 facilities inspected or re-inspected. Vegetated: 18 facilities found in non-compliance. Structural: 94 facilities found in non-compliance.
- Staff completed an assessment of industrial and commercial sites in 2017-2018; over 600 businesses within the UGB were identified and ranked based on a list of criteria which influence the site's potential to pollute. During this reporting period staff continued with updating the list and reviewing outreach options. No outreach BMP letters were sent out due to COVID-19 closures.
- Under the first TMDL IP, educational outreach materials were developed and distributed to mobile pressure washing companies, pressure washing rental companies and home improvement centers that sell pressure washers. The material addresses warm water discharges and City regulations. Outreach material

goes through an annual review process, the intention of the review is to ensure they are up-to-date and provide the target audience with the best management practices for warm and/or polluted water. No site visits were conducted due to COVID-19 closures.

- T4 – Public Outreach and Education

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

Summary:

- Staff continues to revise and update existing education and outreach materials and participate in clean water classes in schools and community events such as; Earth Day, Regional Pressure Washing Campaign, Fish Friendly Car Wash Kits, Public Works Week, Career Day, Youth Day of Caring, Lane County Home Show, BRING Tour of Homes, and garden shows. This year some of the outreach venues were closed and the events did not take place because of COVID-19 statewide closures. Staff was able to participate in some virtual outreach efforts as well as creating our own virtual projects such as the Clean Water University. Additionally, social media was used much more as an outreach method than in the past. Some postings on social media included planting native plants and work parties. Some projects are mentioned below.
- A Clean Water Garden booklet series that focuses on water harvesting, stream side gardening and riparian planting continues to be popular for homeowners and residents. Information on temperature as a pollutant and canopy tree planting is included in the material. The booklet series continued to be distributed in stores. In FY21, 60 booklets went out to the public at distribution sites.
- IDDE response, educational outreach, and enforcement continued in response to temperature related discharges, vegetation removal, and yard debris dumping.
- School workshops continue to include temperature as a pollutant discussion and the importance of tree shading along banks of streams. Staff redesigned the Clean Water University Program in 2018 to include wastewater education and now includes Eugene’s 4J and Bethel school Districts. This last reporting cycle staff developed a virtual class.
- Earth Day was held as a virtual event this last year, staff created a virtual stormwater tour that was set up as a virtual map and route to various facilities around town, the Children’s Celebration and the Olympic Trials Run Walk event were the only 2 in-person events that we were able to participate in due to COVID-19. The Children’s Celebration distributed 200 Car Care brochures and 181 erasers, and the Trials distributed 20 frisbees and 46 pens.
- As mentioned above staff chose to use social media much more this year and was able to cover multiple subjects even bringing in a couple new topics such as fireworks and ash clean-up.

- The Mill Race interpretive signs along the path continue to be maintained and provide educational information to the public.
- The pollution prevention educational portfolios were updated and restocked. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address warm water as a pollutant.
- Car washing water not only contains warm water but also soaps, chemicals, and oils. In FY21 the kits did not go out due to COVID-19 closures.
- The Water Quality Facility Management Program provides outreach and educational information with every condition report. Staff stresses the importance of a canopy and shrub coverage in water quality facilities. In FY21, 150 O&M reminder postcards were mailed out.
- The City's Up Stream Art project had its fifth successful year. Advertisements, media spots, social media feeds, and staff interview all provided an opportunity to discuss stormwater pollution; the art as well sends a message out daily. The public was not formally invited to participate in the viewing of the art while it was being installed due to COVID-19, but some people were able to view the event as they walked by the area. It was highly publicized on our website and a virtual tour and story map were created showcasing the sites.
- The City along with regional partners started a zinc study and education project. This project will focus on sources of zinc and identify educational opportunities. Zinc is mostly used by the general public to control moss. Too much vegetation and/or vegetation in the wrong place can promote moss growth causing the overuse of control agents. This project will include public education about how to prevent moss growth and also stormwater-friendly ways to remove it. No activity took place during this reporting cycle due to COVID-19 closures.
- Under the MS4 Phase 2 General Permit there is a requirement to assess one education and outreach activity per year and include that assessment in the MS4 Annual Report. During this TMDL reporting cycle, staff developed a template to be used for those activity reviews. The assessment of one activity occurred in July of 2021, see Springfield's MS4 Annual Report for that assessment.
- The annual 'Canines for Clean Water' calendar featured education about native plants, BMPs for washing, and more tips on ways to keep our streams cool for wildlife.

The goals and tasks for temperature reduction as outlined in the 2019 TMDL IP are all on track. Springfield was issued its MS4 Phase 2 General Permit on June 1, 2021, the permit lists specific targeted audiences and specific targeted topics that need to be addressed as public outreach efforts during permit coverage. Because of this, some of the current programs and projects that are currently being implemented for illicit discharge, code reviews, post-construction management, construction site runoff, and public education may change direction or be eliminated.

Bacteria:

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

Summary:

- SOPPs related to SSO procedures and protocols and contractor provisions were reviewed with minor updates made in April 2021. The City continues to evaluate and adaptively manage its procedures and policies as needed, coordinating efforts with the other Development and Public Works divisional staff. If the reviews determined that more in-depth updates need to occur, these are schedule as a benchmark to be completed by January 2022.
 - SSO and SOPP procedures and protocols continue to be reviewed as needed and/or after an incident. Springfield continues to place high emphasis on providing the proper handling and reporting procedures to staff and regulatory agents in responding to any SSO within its jurisdiction.
 - Contractors working on new or existing sanitary systems under City supervision continued to be provided with information for proper reporting as part of the contractor provisions.
 - IDDE and Operations staff continue to respond and address bacteria related discharges as they are identified. Staff responded to zero public SSOs, two private sanitary discharges, and six graywater discharges during this reporting period.
- B2 - Animal/Pet Waste - Program Enhancement
 1. Continue to work with local partners to identify locations for pet waste stations; install and maintain stations.
 2. Continue to identify pet care providers and services and identify outreach opportunities; update facility list and continue to distribute educational materials.
 3. Continue pet waste education and public events; identify options for material distribution, hold events, and update material as needed.
 4. Wildlife feeding outreach and education; continue to identify locations, appropriate outreach methods, track distribution, and explore options of a wildlife feeding ordinance.

Summary:

- During this reporting period, discussions with Willamalane Parks and Recreation District, Springfield School District 19, and City Operations Division staff identified additional locations for pet waste stations or bag dispensers. Stations and dispensers continue to be installed as locations are identified; one replacement station was installed. Staff and partners continue to monitor existing

stations, replenish bags, and evaluate new locations. A total of 9,800 bags were distributed by city staff during this reporting period. Stations and O&M of stations are tracked in the PEO App.

- In previous years, pet parks, kennels, pet supply stores, and pet daycare facilities have been identified and outreach material developed. City staff continues to work with facilities on waste handling and problem areas as needed. Staff updated the pet service providers list. Due to COVID-19 closures, staff did not visit any of the facilities.
 - Pet supply stores have been identified and outreach material developed and continues to be distributed in stores. Educational material continues to be monitored, stocked, updated, and replaced as needed. No pet waste management brochures were distributed during this reporting period as part of the routine distribution project due to COVID-19.
 - Pet waste management education at public events is ongoing as is the City's participation with regional outreach groups. Staff continues to participate in public events such as the Lane County Home Show, Willamalane Pet Fest, Spring Clean-up, Canines for Clean Water pledge events, and Regional Pressure Washing Campaign. Due to COVID-19, staff was only able to participate in two events, the Children's Celebration, and the Olympic Trials Race Walk event. All other outreach was either done virtually or through social media.
 - The "Canines for Clean Water" program continues to be a success. Springfield residents submitted photos for the 2021 contest and pledged to pick up after their pet. The 2022 calendar contest drew 30 pledges and submissions via Facebook. The contest was promoted through social media. No public booth events were held during the reporting period due to COVID-19; the "Canines for Clean Water" calendar pledge event was done online. Additionally, 51 bag holders, 29 bandanas, 8 business signs, and 32 yard signs were distributed to the public. The Canines for Clean Water calendar continues to be a hit as well; 4,000 2021 calendars were distributed at local pet supply stores and other locations.
 - Springfield residents continue to pledge to scoop the poop online.
 - Discussions have continued with Willamalane Parks and Recreation District staff and the City's Operations staff regarding waterfowl and nutria feeding. "Please don't feed the wildlife" signs had been developed under the last TMDL Plan and continue to be installed at problem locations to deter animal feeding; 10 new signs were installed at 4 locations.
 - Staff explored the development of a wildlife ordinance during previous reporting periods. It was decided that education and outreach should remain the primary tool for encouraging the desired behavior. The next discussions and exploring of options are due by April 2022.
- B3 - Septic Tank, Transient Camping & Private Sanitary Infrastructure Outreach & Edu

1. Maintain septic tank inventory program; maintain inventory, update educational materials, and work with property owners to provide sanitary services where needed.
2. Continue investigation into sanitary waste disposal practices; continue to identify targeted audiences.
3. Review transient camping procedures; update as needed, work with property owners, and assess known sites.

Summary:

- The septic tank inventory within the City limits is complete; sites continue to be added to the inventory when discovered or removed when connected to the City sewer system. The septic system inventory is now accessible via the City's mapping application.
- During this reporting period, nine septic systems were decommissioned and connected to the City sewer system.
- The septic system guide for homeowners was updated during last reporting period and was mailed out to all property owners and residents in the City Limits. This reporting year staff sent out maintenance reminder postcards to 784 septic owners and 449 renters and there was one social media post encouraging maintenance.
- 130 feet of sanitary sewer rehab projects were completed during this reporting period, design and planning work continues. Design work for the phase 2 project of Franklin Blvd. is in the works and will have the potential to greatly reduce septic systems along Franklin Blvd. as a sanitary sewer extension will be part of the process.
- The assessment of commercial bacteria waste was completed in a previous reporting period; it was reviewed and updated in FY20. Six potential bacteria sources have been identified with educational outreach and site assessments implemented for some of the sites. No BMP mailing occurred during this reporting cycle to the four types of businesses: aquariums, meat and poultry, drain cleaners, and portable sanitation companies because of COVID closures.
- A list of known chronic transient camping sites has been developed and continues to be updated and sites monitored. Sites that have a negative impact on health and/or water quality are cleaned up first, on a priority basis as funding allows. Code Enforcement currently works with private owners who wish to deter campers. Multiple sites have been cleaned up along the rivers and local waterways. Sites will continue to be monitored, assessed, removed as needed, and discussions between internal agencies continue. During this reporting period there were 40 sweeps, 31 of those in the UTZ, and 62 camps cleaned. During the Statewide COVID-19 closures and policy changes on enforcement of transient camping (Statewide), only sites that were considered a health hazard were responded to. Additionally, a review of procedures was done.

- B4 – Public Outreach and Education

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

Summary:

- Staff continues to revise and update existing education and outreach materials pertaining to bacteria. Implementation of a “Canines for Clean Water” program has proven to be well received and a good way to spread the message. It will continue to be an active program within budget and staffing constraints. See B2 above for additional information on the program. This year some of the outreach venues were closed and the events did not take place because of COVID-19 statewide closures. Staff was able to participate in some virtual outreach efforts as well as creating our own virtual projects. Additionally, social media was used much more as an outreach method than in the past. Some projects are mentioned below.
- Pet supply stores have been identified as outreach distribution sites and will continue to be stocked with materials. The pet waste management brochure was updated. Distribution at local pet care facilities did not occur during this year due to COVID-19.
- Clean Water University provides hands on education about water quality and ways to prevent bacterial pollution such as picking up after pets. The fall session was held virtually this last year. Staff put together a video about stormwater and aquatic macroinvertebrates for the Springfield and Eugene school districts since the field trips were cancelled due to COVID-19. This video shows waterways around Springfield and Eugene, wildlife, and how to identify the macroinvertebrates that live there.
- The City’s Little Litter Campaign is ongoing; six signs were provided to one business and one residential housing apartment. This campaign focus on the small such as cigarettes butts, gum, wrappers, food, cans and bottles, plastic, disposable diapers, wipes, etc. Several meetings were held to determine a new outreach effort beyond the back of bus ads. Unfortunately, due to scheduling conflicts and the outbreak of COVID-19 staff was unable to implement the program in the way in which we wanted; efforts will continue in FY22.
- Two illicit discharges that involved private sanitary waste were responded to and eliminated and six illicit graywater discharges were also eliminated. Owners were provided with bacteria and waste information.
- The pollution prevention educational portfolios were updated and restocked. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address bacteria from pets and wildlife as a pollutant.
- The IDDE response staff continues to hand out factsheets about bacteria from sources such as pet waste. Even though the UpStream Art Project took place last

year, it was not open to the public so information that usually is distributed at an event table was not distributed.

The goals and tasks for bacteria reduction as outlined in the 2019 TMDL IP are all on track. Springfield was issued its MS4 Phase 2 General Permit on June 1, 2021, the permit lists specific targeted audiences and specific targeted topics that need to be addressed as public outreach efforts during permit coverage. Because of this some of the current programs and projects that are currently being implemented for illicit discharge, SSO response, code reviews, post-construction management, assessments, and public education may change direction or be eliminated.

Mercury:

- M1 - Limit Construction Site Erosion

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

Summary:

- The Land Drainage and Alteration Program (LDAP) staff continues to monitor and work on streamlining the permit process. Municipal code addressing LDAP code and erosion concerns was developed, adopted by Council, and implemented previously. No changes were made during this reporting period due to the MS4 General Permit litigation. A review of the LDAP Program was completed during this reporting cycle. The review compared existing program elements to the Modified General Permit and identified gaps. The TMDL Plan calls out a benchmark for updates by July 2022, if needed.
- Springfield continues to implement permit and program compliance that meet 1200-CN NPDES permitted activities within the City Limits. Reporting data pertaining to 1200-CN permits is included in Springfield's MS4 Annual Report dated October 2021. This year the MS4 reporting period was only for 30 days in June. During the full FY21 665 inspections were done at 134 sites. 1200C Permit application and information is referred to the OR DEQ. Staff continues to post and distribute as needed related education and outreach materials on the City webpage.
- The City continues to maintain CESCL certification for two LDAP staff and has additional staff in Water Resources, Operations, and Engineering that maintains certification.
- LDAP program inspection and compliance continues to provide erosion and sediment control enforcement and compliance. There were 665 inspections completed at 134 project sites.

- M2 - Enhance Post Construction Support

1. Continue Water Resources staff participation in plan review process.
2. Continue to implement a private post-construction program.

Summary:

- Water Resource staff continues to be active in Development Plan Review, Pre-Development Review, and Pre-Construction meetings and process.
 - A Water Quality Facility Inventory and Inspection Program to ensure long-term O&M of facilities is ongoing. Inventory collection and mapping is ongoing, and inspections continue. Inspections occur every year during the summer months starting in July. Inventory mapping occurs just prior to inspections and is ongoing as new facilities are constructed or identified. In FY21 57 new facilities inventoried and 452 facilities inspected or re-inspected – both vegetated and structural. 18 vegetated facilities found in non-compliance and 94 structural facilities found in non-compliance. There were 150 WQF maintenance reminder postcards mailed out.
 - There were 29 public water quality structural facility inspections and 51 inspections done at 38 public vegetated facilities. These facilities are cleaned and inspected by Operations staff.
 - Water Resource staff currently participates in major infrastructure and Code update projects; two public projects, the Brooklyn Swale and the Virginia Daisy Street Project, both implemented design standards that pertain to water quality and LID approaches.
 - Water Resource staff continued to map and track the presence of well head protection signs at locations that have water quality treatment and signage requirements; this is done as part of the Water Quality Facility Management Program.
- M3 - Street Sweeping, Catch Basin, and Pipe Cleaning Programs
 1. Continue to implement current programs for sweeping, basin cleaning, and storm drainage pipe cleaning; adaptively manage program practices and standards.

Summary:

- Currently, three (3) FTEs and three (3) sweepers are budgeted to sweep the 370 curb miles of City streets. One mechanical Elgin Broom Bears sweeper is scheduled to sweep the residential streets seven times a year. Two (Schwartz and TYMCO) vacuum sweepers are scheduled to sweep arterials/collectors 22 times per year. Depending upon traffic patterns, some streets are swept weekly and others every two weeks. Over 1,352 curb miles of routine sweeping took place in FY21.
- 1,516 catch basins were cleaned with 51 tons of material removed; numbers were lower this FY due to COVID-19. This currently works out to be 22% of publicly owned and operated basins. Springfield. 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.

- Over 1,800 feet of storm line was cleaned, 3,432 ft. of ditch /channel cleaning, and 11,626 feet of reshaping took place.
- Another review of the sweeping, catch basin cleaning, and storm pipe cleaning programs was completed in April 2021, the next review is scheduled for April 2022.
- The leaf pickup program resulted in 329.1 tons of material being hauled off for composting instead of ending up in the catch basins and streams.

- M4 - Hazardous Waste Control

1. Identify sources of mercury pollution and determine what type of projects can be implemented. Review and update the source assessment.
2. Use household waste collection events to encourage proper disposal of items containing mercury.

Summary:

- Staff continued to research sources of mercury and mercury pollution and what household products, electronics, and appliances may contain mercury. A brochure was developed in FY16 and updated this FY, only 1 brochure was distributed during this reporting period and 0 vouchers for a thermometer trade-in handed out due to COVID-19.
- Development and Public Works continues to hold the annual Springfield “Spring Cleanup” event that collects electronics and other waste for recycling and proper disposal. The event takes place in May every year but was canceled in FY21 due to COVID-19 social event restrictions. The City continues to be an active member of regional groups that address household hazardous waste.
- ESD staff continues to participate in the Regional “Eco Biz” Program that addresses and promotes recycling and spill control with local auto shops. The City’s Fleet Maintenance Facility continues to maintain its Eco-Biz Certification. The Eco-Biz program did not have any re-certifications, inspections, or site visits due to COVID-19. One mailing went out to 51 businesses providing information about the program.
- Not all auto shops can achieve State Eco-Biz status but may qualify as a “Clean Water Business” through the City program. Both programs promote recycling, and proper storage of hazardous material. 53 letters went out to auto shops and 10 to car wash facilities in Springfield’s jurisdiction. The list of facilities was updated but no site visits were made due to COVID-19 closures.
- The City of Springfield, in collaboration with the City of Eugene, Oregon DEQ, and Oregon ACWA continue to implement the requirements of Effluent Limitations Guidelines and Standards for the Dental Category. The cities continue to monitor implementation of Best Management Practices for dental offices and

installation of amalgam separators. The program is designed to limit the discharge of mercury and silver bearing wastes into the regional wastewater collection system. Additionally, on July 14, 2017, the EPA published Effluent Limitations Guidelines and Standards for Dental Offices (40 CFR Part 441) in the Federal Register, which established national standards for dental offices that place or replace dental amalgam and discharge to the sanitary sewer and limit mercury discharge to publicly owned treatment works (POTW). The cities of Eugene and Springfield completed an initial notification to all existing source dental facilities in on April 10, 2019. A second notification was provided to existing source facilities that had not yet submitted certifications on January 15, 2020. Both cities also have systems in place to identify new source dental facilities that open in the service area and provide them with notification letters. The cities of Eugene and Springfield have received certifications from 100% of dental facilities in the service area.

- A drug take back box for unwanted pharmaceuticals was installed at the City Police Department in previous years. Although the drug take back box does not directly affect the collection of mercury it has been very effective in collecting and removing pharmaceuticals from the waste stream and heightening people's awareness. Some pharmaceuticals can or do contain mercury, but the city does not track that information. One regional drug take back round up event was held in October 2020.

- M5 – Public Outreach and Education

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

Summary:

- Staff continued to revise and update existing education and outreach materials. The LDAP Program erosion and sediment control factsheets are posted to the City webpage.
- The pollution prevention educational portfolios were updated and restocked. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address auto fluids as a pollutant, and sediment control.
- As mentioned above, a mercury educational brochure was developed, and one brochure distributed.
- Illicit discharge continues to be enforced. Electronics that are dumped are collected and taken to a local electronics recycler for proper disposal. IDDE response always includes educational outreach when appropriate.
- The water quality facility management program continues to be implemented. Mercury and other heavy metals bind to sediment; having routine inspections and maintenance of facilities cleans out potential contaminated sediment. Postcards

are sent out every year reminding owners to maintain their facilities; proper O&M will ensure a healthy and fully vegetated facility which in turn will provide treatment, infiltration, and cooling of runoff. A total of 150 reminder postcards were sent out this reporting cycle.

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

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

Springfield was issued its MS4 Phase 2 General Permit on June 1, 2021, the permit lists specific targeted audiences and specific targeted topics that need to be addresses as public outreach efforts during permit coverage. Because of this, some of the current programs and projects that are currently being implemented for illicit discharge, code reviews, post-construction and construction management, and public education may change direction or be eliminated.

Adaptive Management Measures

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

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

Response to the 2019 Revised Willamette Basin TMDL for Mercury

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

Implementation Matrix

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

Table 1 – 2019 TMDL Implementation Tracking Matrix

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS		
Temperature	Solar radiation to surface waters	T1 - Inventory Existing and Potential Shade and Enhancement Areas	Task 1 - Maintain a priority project list for riparian/channel enhancement projects.	Engineering Division Water Resources Division	Review the existing inventory identifying potential sites.	By April 2021 – 1 st review. By April 2023 2 nd review	A reviewed and updated priority list of potential sites.	1 st review and update are 100% complete. Staff continues working on related prep work such as basin delineation, MS4 outfalls, surface waters, WOTUS updates.		
				Engineering Division Water Resources Division	Update the existing inventory identifying potential sites.	By July 2021 – 1 st update. By July 2023 2 nd update				
			Task 2 - Continue to work to develop public/private partnership projects.	Engineering Division Water Resources Division	Continue to explore available options for partnering on projects.	Ongoing throughout the cycle			Meet with selected groups and propose partnerships to implement; target one public/private project for completion during the 5 year cycle.	Ongoing 100%; work with 48 th St Channel, LTWC, and UWWP groups
			Task 3 - Review existing natural resource inventories and identify needs.	Community Development Division	Review existing natural resource inventories and identify needs.	By July 2022			Natural resource inventories reviewed, and next steps identified.	100% complete; LWI, NR Inventory, and WQLWs all identified as needing updates. Work is in process.
	Solar radiation to surface waters	T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement	Task 1 - Additional review of Development Code for parking lot, streetscape, riparian vegetation management, setbacks, and buffers, and retrofit practices.	Community Development Division Water Resources Division	Review the Development Code with key planning staff and determine if shading or riparian protection amendments are appropriate.	By April 2021	Review of Development Code for enhancement of riparian protection, parking lot shading, streetscape shading, setbacks/buffers and retrofit practices.	100% complete; review done, and gaps identified. Staff working on City-wide code updates and will incorporate any gaps into that adoption process.		
				Community Development Division	If amendments are appropriate, staff may develop and initiate proposed changes for review by City Council, or work to include them in an amendment package.	By July 2022	Proposals brought to Council.	0% complete – not due until July 2022 if needed.		
			Task 2 - Mill Race restoration, management and enhancements	Engineering Division Water Resources Division	Work to identify discrete projects that can advance overall restoration. These include work both inside and outside of the initial ACOE study area, such as in the Lower Mill Race.	By April 2021 and again by April 2023	Review and update project list.	100% complete; list reviewed and updated. Planting continues along sections of the Mill Race.		
	Warm water discharges	T3 – Manage Industrial Warm Water Discharges	Task 1 - Identify industries within Springfield’s City limits with stormwater discharges and provide technical assistance to reduce warm water discharges and improve stormwater treatment where opportunities exist.	Water Resources Division	Continue to stay informed regarding the stormwater permits and provide feedback to industry and the DEQ, when applicable.	Ongoing throughout the cycle	Industrial stormwater permits reviewed, comments provided, and technical assistance provided as needed.	Ongoing: 100% this reporting FY - no permits reviewed this cycle as there were none renewed or issued.		
				Water Resources Division	Reviews the list of current industrial stormwater dischargers within Springfield and identify opportunities to provide technical assistance.	Review/update by July 2020 Review/update by July 2022	List reviewed and updated as needed; opportunities identified.	100% complete; by July 2020 list developed and outreach approach started.		
	Public Interaction	T4 – Public Outreach and Education	Task 1 - Continue to review, develop, and distribute outreach and education materials to the public.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY		

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
				Water Resources Division		By June 2020 and By June 2023	Educational material assessed.	100% complete; by July 2020 all PE materials reviewed and some material updated. Next review will take place in 2023
Bacteria	Sanitary sewer system	B1 - Sanitary Sewer Overflows - Work Practices	Task 1 - Review current standard operating procedures for sanitary sewer spill response. Amend or revise if appropriate.	Water Resources Division Operations Division	Review relevant SOPPs for spills and overflows.	by April, 2021	Review(s) completed	100% complete –documents reviewed.
				Water Resources Division Operations Division	Revisions, if needed.	by January 2022	Approve and implement new or amended SOPPs if appropriate	80% complete –some updates made. Not due this reporting FY
			Task 2 - Review contractor work provisions to ensure contractors understand Springfield’s requirements for dealing with sanitary sewer spills.	Engineering Division Water Resources Division	Conduct review of relevant Springfield standard contracting specifications.	By April 2021	Review of contract specifications	100% complete –review was completed.
				Engineering Division	Develop revisions, if needed	By January 2022	Adoption of new or amended contractor work provisions, if appropriate.	100% complete –no action requiring updates this reporting FY. Will update if needed next FY.
	Animal/Pet waste	B2 - Animal/Pet Waste - Program Enhancement	Task 1 - Coordinate with local partners to identify additional locations for pet waste disposal stations in public areas and assist with placement and maintenance.	Water Resources Division	Continue to collaborate with local partners to identify additional prospective pet waste stations.	By April 2020 and By April 2022	Update and maintain a list of possible locations.	1 st round 100% complete – contacted Willamalane, School District, and OPS
				Water Resources Division	Continue to coordinate or otherwise assist with installation and maintenance of any new sites.	By August 2020 and By August 2022	Installation and maintenance of new sites.	1 st round 100% completed – one station replacement this FY.
				Water Resources Division	Continue to maintain an inventory of station locations	Ongoing throughout the cycle	Map updated and maintained.	Ongoing – 100% complete this reporting FY - locations tracked in PEO App.
			Task 2 - Continue identification of pet care providers and services and identify outreach opportunities.	Water Resources Division	Continue to identify, review and update list of pet supply, service, and care facilities. Assess outreach needs and options.	By April 2020 and by April 2022	Update list of facilities and outreach needs and options.	100% complete for this reporting FY; list updated last FY20
				Water Resources Division	Continue to coordinate with facility owners on educational material distribution and track location and materials.	Ongoing throughout the cycle	Continued distribution of outreach materials.	Ongoing – 100% complete this reporting FY - material distribution continues.
				Water Resources Division	Continue to offer and provide facilities technical assistance in proper waste management.	By April 2020 and by April 2022	Reach out to participating facilities. Track participation.	100% complete this reporting FY; letters sent to 13 businesses.
			Task 3 - Continue pet waste outreach and education at public events and distribute outreach materials.	Water Resources Division	Continue to identify and review options for distributing outreach materials that discuss proper waste management.	By April 2020 and by April 2022	Updated list of distribution sites	100% complete this reporting FY; options assessment completed last FY20.
				Water Resources Division	Review and update, as needed, program educational materials.	By June, 2020 and by June, 2023	Review, revise, and approve current educational.	100% completed this reporting FY; all material reviewed last FY20. Updated brochures printed in FY21.
				Water Resources Division	Hold at least one Canines for Clean Water pledge event each fiscal year.	Starting July 2019	One pledge event per FY held.	100% complete this reporting FY; 1 virtual pledge event/ calendar photo contest held.
				Task 4 - Wildlife feeding outreach and education.	Water Resources Division	Continue to coordinate with partners such as the park district and City Operations staff to identify locations of wildlife feeding, and if appropriate post signs.	By April 2021 and by April 2023	Updated list of locations. If appropriate, the number of new signs installed.
			Water Resources Division		Continue to track distribution and update inventory	Ongoing throughout the cycle	Location map updated and maintained.	Ongoing – 100% complete this reporting FY; sites tracked in App. and 10 signs went out.

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS			
Sanitary wastes	B3 - Septic Tank, Transient Camping and Private Sanitary Infrastructure Outreach and Education		Task 1 - Maintain a septic system inventory for sites within the City limits; work with property owners to provide public sanitary services when feasible. Review, update, and deliver educational material as appropriate.	Water Resources Division	Continue to explore adopting a wildlife feeding ordinance.	By April 2022	Review done and options investigated.	0% complete; no action required this reporting FY.			
				Water Resources Division Information Technology	Continue to maintain a septic system inventory within the City limits.	Ongoing throughout the cycle	Updated septic system inventory.	Ongoing; 100% complete this reporting FY, inventory updated.			
				Engineering Division	Continue to -work with property owners within the City limits to provide public sanitary services when feasible. Continue to incorporate and extend services as appropriate.	Ongoing throughout the cycle	Properties within the City Limits connected to public system, as appropriate.	Ongoing; 100% complete this reporting FY – 9 new connections.			
				Water Resources Division	Review, update as needed, and deliver outreach and educational materials to owners.	By April 2020 and by April 2023	Outreach and educational material updated and distributed.	100% complete this reporting FY. Additional 784 owner and 449 renter postcards went out.			
				Water Resources Division	Continue to identify target audiences and develop and distribute outreach material specific to them which incorporate BMPs and relevant regulatory requirements.	By April 2020 and by April 2023	Audiences identified; educational material developed and delivered.	100% complete this reporting FY.			
				Water Resources Division Operations Division	Review and update procedures & priority site determination criteria with PD and Operations staff as needed.	By April 2020 and by April 2022	Policies, procedures, and priority list reviewed and updated.	100% complete this reporting FY; reviews by April 2020 – additional policy changes due to COVID-19 noted in documents.			
	B3 - Septic Tank, Transient Camping and Private Sanitary Infrastructure Outreach and Education (cont.)		Task 3 - Review transient camping procedures, and focus additional efforts where sanitary waste or other waste impact open waterways. Seek enforcement through existing codes/statutes, as resources allow.	Water Resources Division Community Development Division	Work with land owners and regional partners, as needed, to enforce illegal camping regulations on private property.	Ongoing throughout the cycle	Enforcement of illegal camping that may impact open waterways.	Ongoing – 100% completed this reporting FY; enforcement a combination of IDDE and Code Enforcement.			
				Water Resources Division Operations Division	Assess known campsites on public land and update the priority list for removal. Continue to investigate campsite deterrent measures.	By July, 2020 and by July, 2022	Assess known illegal camp sites and updated priority list.	100% complete this reporting FY; 40 sweeps with 62 camps cleaned.			
				Water Resources Division	Task 1 - Continue to review, update, develop, and distribute outreach and education materials to the public, as needed.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY.	
				Water Resources Division		By June 2020 and by June 2023		Educational material assessed.	100% complete; by June 2020 all PE materials reviewed and some material updated.		
				Public Interaction	B4 – Public Outreach and Education		Engineering Division	Staff will review the LDAP program to determine if program revisions, enhancements, or modifications are appropriate.	Review by April 2021 and update by July 2022, if appropriate.	Current program reviewed and updated, as appropriate.	Review is 100% complete; A program review was completed in April 2021
							Engineering Division	Refer construction activity within Springfield’s jurisdiction that requires 1200C permits, to the Oregon DEQ.	Ongoing throughout the cycle.	Tracking of 1200C permit referrals.	100% complete this FY – tracking/referring maintained
Engineering Division	Task 1 - Continue Water Resources staff participation in the City’s development plan review process.	Water Resources Division	Continue involvement by engaging in the review process for proposals requiring engineering review and/or smaller scale developments that include water quality or LIDA.				Ongoing throughout the cycle	Involvement in the review process for developments having WQ and/or LIDA proposals.	Ongoing - 100% complete this reporting FY		
Engineering Division		Water Resources Division								Community Development Division	Continue to provide assistance, as needed, in the review and update of design standards and or codes as they relate to water quality facilities and post-construction development requirements.
Water Resources Division	Task 2 - Continue to implement a post-construction BMP inspection program to ensure maintenance of	Water Resources Division	Review program, adaptively manage, update as needed.				By April 2022	Assessment/review of program; updated as appropriate.	100% complete; program documents reviewed and updated.		

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
			water quality facilities at private sites.	Water Resources Division Engineering Division	Continue program implementation within resource limitations.	Ongoing throughout the cycle	Continue implementation of a Stormwater Facility Management Program.	Ongoing – 100% complete this reporting FY
	Urban street runoff	M3 - Street Sweeping, Catch Basin, and Pipe Cleaning Programs	Task 1 - Continued implementation of the current programs for street sweeping and catch basin and storm drainage pipe cleaning. Adaptive management of program practices and standards to enhance maintenance standards, as needed.	Operations Division	Continue implementation of street sweeping and storm system cleaning programs to reduce pollutants in the public ROW and drainage system(s).	Ongoing throughout the cycle	Ongoing tracking and reporting of street sweeping and storm system cleaning.	Ongoing – 100% complete this reporting FY; 370 curb miles swept
				Operations Division	Strive to inspect/clean at least 10% of City owned catch basins/inlets per year.	Starting July 2019	Strive to inspect/clean at least 10% of City owned catch basins/inlets per FY; track and report.	100% complete this reporting FY; 22% of City basins cleaned
				Operations Division Water Resources Division	Review existing sweeping, catch basin, and pipe cleaning program practices/standards and develop enhanced standards, as needed.	Review by July 2021 and update, as needed by January 2022.	Practices/standards reviewed and enhanced, as needed	100% complete - staff completed the review in April 2021
	Hazardous waste control	M4 - Hazardous Waste Control	Task 1 - Identify sources of mercury pollution and which household products, electronics, appliances, etc... may contain mercury and determine what pollution prevention projects/programs are feasible to implement.	Water Resources Division	Review and update, as needed the mercury pollution source assessment; research sources of mercury and determine what pollution prevention projects/programs the City has resources to implement.	By April 2021 and by April 2023	Complete Mercury pollution source assessment updated.	100% complete; brochure was updated, and the Mercury Source Assessment was completed in March 2021
					Task 2 - Use household waste collection events to encourage proper disposal of items containing mercury.	Development and Public Work Department	Springfield will continue to participate in and support events involving hazardous waste.	Ongoing throughout the cycle
	Public Interaction	M5 – Public Outreach and Education	Continue to review, develop and distribute outreach and education materials to the public, as needed.	Water Resources Division	Continue to review, develop, and distribute educational materials.		Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY.
				Water Resources Division				By June 2020 and 2023

The following is a reporting summary matrix (Table 2) to demonstrate compliance and status for program implementation to meet the conditions listed in Table 13-11 if the Revised Willamette Basin Mercury TMDL.

Table 2 - Reporting Matrix to address the Revised Willamette Basin Mercury TMDL and WQMP

	MS4 General Permit Control Measure	Table 13-11 Minimum Requirements	TMDL Strategy	Proposed MS4 BMP	Actions Proposed MS4 BMP	TMDL Benchmark	TMDL Timeline	TMDL Measure	TMDL Status				
Mercury	Pollution Prevention and Good Housekeeping for Municipal Operations	Must properly operate and maintain its facilities, using prudent pollution prevention and good housekeeping to reduce the discharge of mercury-related pollutants such as sediment, through the stormwater conveyance system to waters of the state.	Conduct municipal operation and maintenance activities in a manner that reduces the discharge of pollutants.	OM1 – Routine Maintenance Operations for WQ	Activity 1: Task 1 - Routine Maintenance Operations for WQ <ul style="list-style-type: none"> Continued infrastructure maintenance activities to reduce stormwater pollution (street sweeping, catch basin cleaning, and water quality facility maintenance). 	Continued infrastructure maintenance activities.	Ongoing	Number of curb miles swept, catch basins cleaned, and water quality facilities maintained.	Ongoing routine maintenance continues; metrics reported in TMDL and MS4 Permit Annual Reports.				
					Activity 1: Task 2 - Maintenance Strategy for SW Controls <ul style="list-style-type: none"> Review and enhance, as needed, maintenance strategy for stormwater controls. 	Task 2 – Draft, review, and enhance, as needed, maintenance strategy for stormwater controls.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2022	Updated maintenance strategy.	Currently have not started updates.				
					Task 3 - Routine Catch Basin Inspection and Maintenance <ul style="list-style-type: none"> Inspect at minimum 10% of the owned or operated catch basins and clean as needed. 	Task 3 - Inspect at minimum 10% of the owned or operated catch basins and clean as needed	Annually	10% inspected and cleaned annually.	Over 10% was inspected and cleaned in both FY 20 and FY21.				
		DMAs must ensure that DMA-owned or operated facilities with industrial activity identified in DEQ’s 1200-Z Industrial Stormwater General Permit have coverage under this permit. The DMA must also conduct its municipal operation and maintenance activities in a manner that reduces the discharge of pollutants to protect water quality.	Ensure that owned or operated facilities with industrial activity identified in DEQ’s 1200-Z Industrial Stormwater General Permit have coverage under this permit.	OM2 – Pollution Control Manuals for City Operations	Activity 2: Task 2 – Industrial Permit Review <ul style="list-style-type: none"> Review 1200z requirements and make determination. 	Review 1200z requirements and make a determination.	By June 30 2021	Determination completed.	Determinations have been done 3 times since Spfld. has been under NPDES MS4 Permit coverage. The most recent was completed in January 2021.				
					DMAs must maintain records for activities to meet the requirements of the Pollution Prevention and Good Housekeeping for Municipal Operations program requirements and include a descriptive summary of their activities in the TMDL Annual Report.	Maintain records for activities to meet the requirements of the Pollution Prevention and Good Housekeeping for Municipal Operations program and include a descriptive summary of in the TMDL Annual Report.	OM2 – Pollution Control Manuals for City Operations	Activity 2: Task 1 - Pollution Prevention Guidance Manuals <ul style="list-style-type: none"> Review and update, if needed, existing stormwater pollution prevention guidance manuals for City operations. 	Review and update, if needed, existing stormwater pollution prevention guidance manuals for City operations.	Schedule based on one or two documents per year – all updated by Feb 28 2024	2 guidance manuals per year updated; 6 total.	Currently have not started updates.	
								OM3 – Municipal Operations Training and Reporting	Activity 3: Task 1 - Municipal Operations Education and Training Strategy <ul style="list-style-type: none"> Develop a stormwater pollution prevention training and awareness strategy of Operations staff, continue to provide training and awareness at least once during the permit term. 	Develop a stormwater pollution prevention training/awareness strategy for internal staff, part of a larger strategy internal staff training strategy.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2022	Internal staff training strategy drafted; one training provided.	Currently have not started updates.
									Activity 3: Task 3 - Municipal Operations Reporting and Annual Program Review <ul style="list-style-type: none"> Continue to maintain records for activities to meet the requirements of the Pollution Prevention and Good Housekeeping for Municipal Operations program requirements and include a descriptive summary/metrics in the annual report. 	Maintain tracking and reporting, include a descriptive summary of metrics in the annual report(s).	By Nov 1 annually	Summary provided in TMDL and MS4 Permit Annual Reports.	Currently provided in FY21 report(s)
Public Education and Outreach	Must conduct an ongoing education and outreach program to inform the public about the impacts of stormwater discharges on waterbodies and the steps that they can take to reduce mercury-related pollutants in stormwater runoff. The education and outreach program must address stormwater issues of significance within the DMA’s community.	Conduct an ongoing education and outreach program to inform the public about the impacts of stormwater discharges.	PE1 - Public Education and Outreach Strategy (PEOS)	Activity 1: Task 1 - Draft a Public Education and Outreach Strategy (PEOS) <ul style="list-style-type: none"> Draft and implement the PEOS. Draft so that each year an evaluation can be completed, and subject matter can change, as needed. 	Develop a Public Education and Outreach Strategy to ensure targeted audiences and topics are addressed.	By Feb 28 2024, ideal goal would be to have it completed by the submittal of the MS4 SWMP (Nov 1 2022)	Drafted PEO Strategy	Currently meetings have been held and a draft document is in development.					

	MS4 General Permit Control Measure	Table 13-11 Minimum Requirements	TMDL Strategy	Proposed MS4 BMP	Actions Proposed MS4 BMP	TMDL Benchmark	TMDL Timeline	TMDL Measure	TMDL Status
	Public Education and Outreach	DMAs must track implementation of the public education and outreach requirements. In each corresponding TMDL Annual Report, the DMA must assess their progress toward implementation of the program, including a qualitative evaluation of at least one education and outreach activity corresponding to the reporting timeframe for the associated TMDL Annual Report. The evaluation should be used to inform future stormwater education and outreach efforts to most effectively convey the educational material to the target audiences.	Track implementation of the public education and outreach requirements. In each corresponding TMDL Annual Report, assess progress towards implementation. Include a qualitative evaluation of at least one education and outreach activity.	PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts	Activity 1: Task 1 - Targeted PE Implementation <ul style="list-style-type: none"> Select from the target audience list and subject areas and distribute a minimum of 1 educational message to each audience. Track to ensure education and outreach is done to each target audience identified at least once during the permit term, construction site operators must be targeted at least twice 	Task 1a - Distribute a minimum of 1 educational message to each audience per year.	By end of FY annually (June 30)	Educational messages delivered to 3 targeted audiences.	Outreach efforts included all 3 audiences in Fy20 and FY21.
Task 1b - Track to ensure each target audience identified at least once during the permit term, construction site operators targeted at least twice.					By end of FY annually (June 30)	Public education and outreach efforts tracked.	Tracking is ongoing and done via an Access database and GIS ESRI App.		
Activity 2: Task1 - Annual Program Review <ul style="list-style-type: none"> Develop a PE Program review to make sure we are meeting the permit requirements; assess progress toward implementation of the program. 					Task 1 - Assess progress toward implementation of the program	By Nov 1 annually	Summary provided in TMDL and MS4 Permit Annual Report	Currently provided in FY21 report(s).	
Task2 - Education Activity Review <ul style="list-style-type: none"> Develop a process for a basic evaluation of education and outreach activity; assessment of at least 1 edu activity conducted per year. 					Task 2 - Assess one education and outreach activity; include in TMDL and MS4 annual reports.	By Nov 1 annually	Assessment of one activity completed and submitted annually.	Currently completed an assessment of one activity and included in the MS4 Annual Report.	
Mercury	Public Involvement and Participation	Must implement a public involvement and participation program that provides opportunities for the public to effectively participate in the development of stormwater control measures. Must comply with their public notice requirements when implementing a public involvement participation process, including maintaining and promoting at least one publicly accessible website with information on the city's stormwater control implementation, contact information and educational materials	Continue to comply with public notice requirements when implementing a public involvement participation process,	PI1 – Public Involvement and Participation Strategy (PIPS)	Activity 1: Task1 - Public Involvement and Participation Strategy <ul style="list-style-type: none"> Draft a PIP Strategy. Document being a public participation plan that includes a stewardship component and discusses the programs and projects, current and proposed. 	Draft a PIP Strategy.	By Feb 28 2024, ideal goal would be to have it completed by the submittal of the SWMP (Nov 1 2022)	PIP Strategy drafted.	Currently meetings have been held and a draft document is in development.
					Activity 1: Task1 - Website Posting and Maintenance <ul style="list-style-type: none"> Review required components to ensure all requirements are being met; ongoing maintenance and postings. 	Review required website components to ensure all requirements are being met; ongoing maintenance.	By June 2022	Review completed and all components met.	Currently a compliance review has been started.
	Illicit Discharge Detection and Elimination	Must implement and enforce a program to detect and eliminate illicit discharges into the stormwater conveyance system. An illicit discharge is any discharge to a stormwater conveyance system that is not composed entirely of stormwater. Must develop and maintain a current map of their stormwater conveyance system. The stormwater conveyance system map and digital inventory must include the location of outfalls and an outfall inventory, conveyance system and stormwater control locations. The DMA must make maps and inventories available to DEQ upon request. When in digital format, the DMA must fully describe mapping standards in the TMDL implementation plan or other city planning document.	Implement and enforce a program to detect and eliminate illicit discharges.	ID1 Illicit Discharge Response and Enforcement	Activity 1: Task1 - IDDE Program Continuation and Review for Compliance <ul style="list-style-type: none"> Continue to implement the existing program and implement a program review process to ensure compliance. Identify program gaps, needs, and update program as necessary. 	Continue to implement the existing program and implement a program review process.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2022	Review completed and all components met. (not inclusive of Dry-weather program or MS4 map – see below)	Currently a compliance review has been started.
					ID3 – City Wide Illicit Discharge and Assessment	Activity 1: Task 1 - Dry-weather Outfall Screening <ul style="list-style-type: none"> Develop a dry-weather screening program; identify outfalls and priority locations. 	Task 1 - Develop a dry-weather screening program; identify outfalls and priority locations.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2022	Dry-weather Outfall Screening Program developed.
				ID2 – Storm System Map	Task 2 - Annual Field Screening of Priority Locations <ul style="list-style-type: none"> Implement annual screening at 20% and include priority locations. (extended = 40% by Nov 2024 if previous inspected then 20%) 	Task 2 - Implement annual screening at 20% and include priority locations. (extended = 40% by Nov 2024 if previous inspected then 20%)	By end of permit term (Feb 28 2024)	Inspected 40% or 20% by end of permit term.	Dry-weather Program in Draft format; it is unclear at this time as to whether our requirement is 40% or 20% by end of permit term.
					Activity 1: Task1 - Continue Mapping and/or Digital Inventory <ul style="list-style-type: none"> Ongoing City GIS mapping and inventory of Storm system infrastructure(s). 	Task 1 - Continue mapping and/or Digital Inventory.	Ongoing	Continued mapping and/or digital inventory.	Ongoing as development is completed and as-builts submitted.
Task 2 - Identify Required Mapping and Inventory Gaps; Update as Needed <ul style="list-style-type: none"> Review mapping and inventory requirements and identify gaps and needs. 	Task 2 - Review mapping and inventory requirements and identify gaps.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2022	Review completed and updates made.	Currently a compliance review has been started. Some mapping updates have already started.					

	MS4 General Permit Control Measure	Table 13-11 Minimum Requirements	TMDL Strategy	Proposed MS4 BMP	Actions Proposed MS4 BMP	TMDL Benchmark	TMDL Timeline	TMDL Measure	TMDL Status
Mercury	Illicit Discharge Detection and Elimination				Task3 - In-field or Desktop Data Gathering as Needed <ul style="list-style-type: none"> Perform any in-field or desktop data gathering as needed. (UGB expansion area will need an inventory and assessment). Finish redefining Storm basins. 	Task 3 - Perform any in-field or desktop data gathering as needed. (UGB expansion area) and complete storm basin updates.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2022	Field and desk top assessment work completed, if necessary.	Only one time thus far has staff had to do field investigation (FY21). Most of this effort is contractual. Additional desktop assessments and updates made to wetland inventory and started local WQLW updates (FY20 and 21).
					Task4: MS4 Map Submittal <ul style="list-style-type: none"> No later than Nov 1 2022 – submit the MS4 map with the 3rd annual report (Nov 2023 3rd AR). Modified permit extends until Feb 28 2024. 	Submit the MS4 map with the 3rd annual report.	By Nov 1 2023, modified permit extends until Feb 28 2024 if needed.	MS4 map submitted	Existing MS4 map available upon request.
		The IDDE program must prohibit non-stormwater discharges into the stormwater conveyance system through enforcement of an ordinance or other legal mechanism, including appropriate enforcement procedures and actions to ensure compliance. The ordinance or other regulatory mechanism must also define the range of illicit discharges it covers, including those discharges that are conditionally allowed, such as groundwater and lawn watering discharges.	Ensure ordinance or other regulatory mechanism defines the range of illicit discharges it covers.	ID1 Illicit Discharge Response and Enforcement	Activity2: Task1: Continue implementation of Illicit Discharge Regulatory Authority <ul style="list-style-type: none"> Continue to implement and enforce ordinance and/or other regulatory mechanisms to prohibit illicit discharges. 	Task 1 - Continue to implement and enforce ordinance to prohibit illicit discharges.	Ongoing	Ongoing enforcement of ordinance to prohibit illicit discharges.	Ongoing
					Task2 - Prohibit through ordinance - Review <ul style="list-style-type: none"> Review existing ordinances and make sure they are in compliance with authority to investigate, require the elimination of illicit discharges, and define the range of illicit discharges it covers. 	Task 2 - Review existing ordinances to ensure compliance with authority to investigate, elimination of illicit discharges, and defines the range of illicit discharges.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2022	Review completed and gaps identified.	Currently a compliance review has been started.
					Activity3: Task1 - Continue implementation of IDDE Enforcement <ul style="list-style-type: none"> Continue to implement current IDDE enforcement procedures. 	Task 3 - Continue to implement IDDE enforcement procedures.	Ongoing	Ongoing enforcement under existing code unless updates identified and implemented.	Ongoing enforcement under existing code.
		The IDDE program must also maintain a procedure or system to document all complaints or reports of illicit discharges into and from the stormwater conveyance system.	Maintain a procedure or system to document all complaints or reports.		Activity 1: Task3: Complaint and Report Tracking <ul style="list-style-type: none"> Annually summarize in the Annual Report the complaint and reporting information. 	Annually summarize in the Annual Report the complaint and reporting information	By Nov 1 annually	Summary of reporting and response reported in Annual Reports.	Metrics reported in TMDL IP and MS4 Permit Annual Report(s).
	Must track implementation of the IDDE program requirements. In each TMDL Annual Report, the DMA must assess their progress towards implementation of the program	Track implementation of the IDDE program requirements.		Activity 1: Task2 - IDDE Reporting and Annual Program Review <ul style="list-style-type: none"> Assess progress towards implementation of the program in each annual report. 	Assess progress towards implementation of the program.	By Nov 1 annually	Summary provided in TMDL and MS4 Permit Annual Report.	Currently provided in FY21 report(s).	
	Construction Site Run Off Control	Must refer project sites to DEQ, or the appropriate DEQ agent, to obtain NPDES 1200-C Construction Stormwater Permit coverage 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 ac).	Refer project sites to DEQ, or the appropriate DEQ agent, to obtain NPDES 1200-C Construction Stormwater Permit coverage.	CSW1 -- Erosion and Sediment Control Regulations	Activity 1: Task4: DEQ Referral Process <ul style="list-style-type: none"> If not already developed and documented, develop and implement a written process for referral compliance with Other NPDES Permits for construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development). 	Maintain and update as needed referral compliance with Other NPDES Permits.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2023	Referral process in place, updated if needed.	Currently have a process in place, will update if needed.
		Require construction site operators to complete and implement an Erosion and Sediment Control Plan for construction project sites in its jurisdictional area that result in a minimum land disturbance of 21,780 square feet (one half of an acre) or more and are not already covered by a 1200-C permit.	Require construction site operators to complete and implement an Erosion and Sediment Control Plan.		Activity 1: Task2: Code and Standards Review <ul style="list-style-type: none"> Review, as needed, existing LDAP Program standards and ordinance(s) to ensure we meet the new standard to implement and enforce a program for construction activities that results in construction project sites that results in a minimum land disturbance of 7,000 sqft. and require construction site operators to complete and implement an Erosion and Sediment Control Plan (ESCP) and have Legal Authority to do so within our ordinance(s). 	Task 2a - Review, as needed, existing LDAP Program standards and ordinance(s) to ensure we meet the new standard to implement and enforce a program.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2023	Updated standards and ordinance if needed.	Currently a compliance review has been started.
		Through ordinance or other regulatory mechanism, to the extent allowable under state law, the DMA must require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects (as described above) from initial clearing through final stabilization to reduce pollutants in stormwater discharges to the stormwater conveyance system	Require erosion controls, sediment controls, and waste materials mgt. controls to be used and maintained at all qualifying construction projects from initial clearing through final stabilization.				Task 2b - Review, as needed, existing LDAP Program standards and ordinance(s) to ensure Erosion and Sediment Control Plan (ESCP) requirements are met.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2023	Updated standards and ordinance if needed.

MS4 General Permit Control Measure	Table 13-11 Minimum Requirements	TMDL Strategy	Proposed MS4 BMP	Actions Proposed MS4 BMP	TMDL Benchmark	TMDL Timeline	TMDL Measure	TMDL Status	
Construction Site Run Off Control	from construction sites Must develop, implement and maintain a written escalating enforcement and response procedure for all qualifying construction sites. The procedure must address repeat violations through progressively stricter response, as needed, to achieve compliance.	Maintain a written escalating enforcement and response procedure for all qualifying construction sites.	CSW3 – Inspections and Enforcement	Activity 3 Task2 - Inspection and Enforcement Program Review <ul style="list-style-type: none"> Review, as needed, existing LDAP Program to ensure compliance with Construction Site Inspections and Enforcement Procedure components. Maintain a written escalating enforcement and response procedure. Task4: Enforcement Procedures Submittal <ul style="list-style-type: none"> Submit the escalating enforcement procedure with the 3rd Annual Report or by Feb 28 2024 	Task 2a - Review, as needed, existing LDAP Program to ensure compliance with Construction Site Inspections and Enforcement Procedures.	By Feb 28 2024, ideal goal would be to meet original by date of Feb 28 2023	Updated inspection and enforcement process if needed.	Currently a compliance review has been started.	
					Task 2b - Maintain a written escalating enforcement and response procedure.	Ongoing	Escalating enforcement and response procedure maintained or updated if needed by Nov 1 2023.	Currently have an enforcement matrix in place.	
						Task 4 - Submit the escalating enforcement procedure.	By 3rd Annual Report Nov 1 2023	Escalating enforcement and response procedure submitted.	Will submit by 3 rd AR.
	Must track implementation of its construction site runoff program required activities. In each TMDL annual report, the DMA must assess their progress toward implementing its construction site runoff program's control measures.	Track implementation of its construction site runoff program required activities. In each TMDL annual report, assess progress toward implementing the program.	CSW4 – ESC Training and Reporting	Activity 4 Task3: Construction Reporting and Annual Program Review <ul style="list-style-type: none"> Develop a Construction Site Runoff Program review template to make sure we are meeting the permit requirements; assess progress towards implementation of the program in each annual report. 	Assess progress towards implementation of the program.	By Nov 1 annually	Summary provided in TMDL and MS4 Permit Annual Report.	Currently provided in FY21 report(s).	
Post-Construction Site Runoff for Development and Redevelopment	Must develop, implement, and enforce a program to reduce discharges of pollutants and control post-construction stormwater runoff from new development and redevelopment project sites in its jurisdictional area.	Implement, and enforce a program to reduce discharges of pollutants and control post-construction stormwater runoff from new development and redevelopment project sites.	PC1 – Post Construction Code and Standards	Activity 1 Task2: Post Construction Codes and Standards Code Review <ul style="list-style-type: none"> Review, as needed, existing Post-Construction Codes and Standards to ensure compliance with required post construction authority, LID requirements, and identify, minimize or eliminate ordinance, or code and development standard barriers one time before Feb 28 2024. Task4: Review Post-Construction Site Plan Review Process and ordinance. <ul style="list-style-type: none"> Review site plan review process(s) and ordinance to ensure compliance with permit requirement for post construction site runoff for new development and redevelopment projects. 	Task 2 - Review, as needed, existing Post-Construction Codes and Standards to ensure compliance.	One time during the permit term. Ideal goal would be to meet original by date of Feb 28 2023	Post-construction code and standards reviewed.	Currently a compliance review has been started.	
	Ordinance or other regulatory mechanism, must require the following for project sites discharging stormwater to the storm water conveyance system that create or replace 10,890 square feet (one quarter of an acre) or more of new impervious surface area: (A) The use of stormwater controls at qualifying sites. (B) 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. (C) Long-term operation and maintenance of stormwater controls at project sites under the ownership of private entity.	Ensure ordinance requires the use of stormwater controls, site specific stormwater management, and long-term O&M's for project sites discharging stormwater to the storm water conveyance system that create or replace 10,890 square feet (one quarter of an acre) or more of new impervious surface area.			Task4: Review Post-Construction Site Plan Review Process and ordinance. <ul style="list-style-type: none"> Review site plan review process(s) and ordinance to ensure compliance with permit requirement for post construction site runoff for new development and redevelopment projects. Task5: Allowance for Alternative Compliance and Stormwater Mitigation Program. <ul style="list-style-type: none"> Review the retention, treatment, and mitigation requirements of the permit and identify gaps, options, and needs. Draft findings and take to Council, as needed, Task6: Update Codes and Standards, if necessary. <ul style="list-style-type: none"> If needed, to ensure compliance with Permit conditions, update Post-Construction Codes and Standards and take to Council for adoption by September 1, 2023-2024. Feb 28 2024 	Task 4 - Review site plan review process(s) and ordinance to ensure compliance with permit requirement.	By Nov 28 2024. Ideal goal would be to meet original by date of Feb 28 2023	Post-construction site plan process reviewed.	Currently a compliance review has been started.
						Task 5 - Review the retention, treatment, and mitigation requirements of the permit and identify gaps, options, and needs	By Nov 28 2024. Ideal goal would be to meet original by date of Feb 28 2023	Post-construction standards taken to Council if needed for adoption.	This will take place if the review identifies areas needing update.

	MS4 General Permit Control Measure	Table 13-11 Minimum Requirements	TMDL Strategy	Proposed MS4 BMP	Actions Proposed MS4 BMP	TMDL Benchmark	TMDL Timeline	TMDL Measure	TMDL Status
		Must target natural surface or predevelopment hydrologic function to retain rainfall on-site and minimize the offsite discharge of precipitation utilizing stormwater controls that infiltrate and evapotranspire stormwater. For projects that are unable to fully retain rainfall/runoff from impervious surfaces on-site, the remainder of the rainfall/runoff from impervious surfaces must be treated prior to discharge with structural stormwater controls. These stormwater structural controls should be designed to remove, at a minimum, 80 percent of the total suspended solids.	Ensure code and standards target natural surface or predevelopment hydrologic function to retain rainfall on-site and minimize the offsite. For sites unable to fully retain rainfall/runoff allow for alternative compliance.			Task 6 – based on review, update Post-Construction Codes and Standards, as needed, and take to Council for adoption.	By Nov 28 2024. Ideal goal would be to meet original by date of Feb 28 2023	Post-construction standards taken to Council if needed for adoption.	This will take place if the review identifies areas needing update.
	Post-Construction Site Runoff for Development and Redevelopment	Must maintain records for activities to meet the requirements of the post-construction site runoff program requirements and include a descriptive summary of their activities in the TMDL Annual Report	Maintain records for program requirements and include a descriptive summary of activities in the TMDL Annual Report.	PC3- Post-Construction Training and Reporting	Activity 3 Task3 - Post Construction Reporting and Annual Program Review <ul style="list-style-type: none"> Develop a post-construction program review template; assess progress towards implementation in each annual report. 	Assess progress towards implementation of the program.	By Nov 1 annually	Summary provided in TMDL and MS4 Permit Annual Report.	Currently provided in FY21 report(s).