



Oct 21, 2022

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Oregon Department of Environmental Quality  
165 East 7<sup>th</sup> 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 Thirteenth Year TMDL Annual Report for our TMDL implementation Plan updated 2022. 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 7-01-2021 through 6-30-2022.

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

Acceptance of our MS4 Plan have not been finalized by the DEQ as of the drafting of this report.

We look forward to your review and response.

Sincerely,

Sunny Washburn  
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Enclosures: Springfield's FY22 TMDL Annual Report  
Springfield's FY22 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

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## TMDL Implementation Plan Thirteenth Year Annual Report 21-22

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Submitted Oct 2022 for July 1, 2021 thru June 30, 2022





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## **Purpose**

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

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

Under its first TMDL, Springfield was required to perform a 5 Year Review Report and submit another 5-year plan to the DEQ by April of 2014. The City drafted and submitted its 2014 TMDL IP and 5 Year Review to the DEQ in March of 2014. The DEQ determined that since Springfield had just submitted the 5 Year Review and its new Plan that it was not necessary to submit an additional Annual Report in 2014. The sixth annual report was submitted in October of 2015, the seventh report in 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, the twelfth was submitted Oct 2022; this Annual Report is Springfield's thirteenth report and covers the time frame from July 1, 2021 to June 30, 2022. The report is due to the Oregon DEQ by November 1st, 2022.

Springfield was issued its MS4 General Permit on June 1, 2021. TMDL pollutants and their waste load allocations (WLA) and load allocations (LA) 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 (MS4 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. In January 2022, Springfield updated its 2019 TMDL IP to incorporate requirements of the U.S. Environmental Protection Agency (EPA) release of the Total Maximum Daily Load (TMDL) for Mercury in the Willamette Basin, Oregon on Feb. 4, 2021.

### **Regulatory Context**

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

### **Reporting Requirements**

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

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

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

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

Springfield’s general permit stormwater management plan (MS4 Plan) which identifies measurable goals and timelines is to be submitted to the DEQ by November 1, 2022. Specific sections of Table 1 relating to Non-point Source Stormwater Runoff – MS4 General Permit Control Measures, identify “*proposed*” general permit measurable goals in addition to our 2019 TMDL IP current goal status. Table 1 will be updated with reporting status as implementation occurs (with annual reporting), and DEQ approves Springfield’s proposed MS4 Plan.

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. Both of these documents were reviewed and updated last in 2021. They are scheduled to be reviewed and updated again in 2023. Ongoing work continues with the LWI and WHA updates in the UGB expansion areas.

- Continued work shade planting near waterways. The City hosted/partnered on 6 Stream Team events which included planting trees and shrubs and cleaning up garbage along waterways and water quality facilities.
- The Mill Race Restoration Project Phase 1 is complete. Shade planting was a priority at this site with canopy trees being planted along the channel banks. Phase 2 of the project, the pond/wetland areas, has been completed with canopy trees being planted along the main channel. This project is in the O&M stage with ongoing maintenance and vegetation monitoring. In July 2022, Operations cleared around 20 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. One tour was given to U of O students that are working on a project that reviews and identifies needed code updates or gaps in the new UGB expansion area. 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. This project is in the O&M stage with ongoing maintenance and vegetation monitoring.
- In the newly expanded UGB areas, natural resource inventories were conducted in FY21 through FY22, including identifying needs, implementing a request for proposal (RFP), inventorying wetlands, developing a 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. In FY22 through FY23 a wildlife habitat assessment (WHA) in the same areas is being conducted.
- 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. The group finished drafting and signing a Memo of Understanding (MOU) and submitted and was awarded an EPA grant.
- Just outside the City Limits, but in the Urban Growth Boundary, the City participated in the review process of the Georgia Pacific Master Plan. This plan was also adopted by the City in November 2021. The plan calls for the retainment of open space and trees. In August 2021, the City and Willamalane staff conducted a site visit to glean visual understanding of impacts of equestrian use

on trails and waterbodies near the property. The City, Willamalane, and Springfield Utility Board staff discussed and are working on updates to the IGA for the property management as all parties hold ownership of the area.

- 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. Per the proposed plan, scheduled updates, and if warranted, code updates would be taken to Council by July 2022. Also, in FY22, staff began work on a review of Post-construction Code and standards in order to meet the conditions of the MS4 General Permit. Staff determined that some Code updates might overlap and therefore not be warranted at this time and will incorporate any needed updates into the larger post-construction code review and update project. Those code updates, if needed, are required to be in place by Feb 28, 2024. The proposed MS4 Plan sets a schedule for updates, if needed.
- Since January 2021 there has been a code/review and update effort for housing and land use planning, as well as some Glenwood development code adjustments. Some stormwater codes are being looked at in those processes as well. MS4 General Permit language is being reviewed at the same time to incorporate any needed language changes.
- Staff continues to work with developers, through the development review process, on providing large canopy trees, maximizing vegetative treatment and/or incorporating additional vegetation into planned project sites, when appropriate.
- A new streetscape project called the Virginia Daisy Bikeway is currently in phase 2; design work and phase 1 was completed during last reporting period. This project incorporated a skinny green street design with trees, swales, and a bike path.
- 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.
- In February 2021, updated the Mill Race Restoration Project List - “Project Wish List” for areas along the MR that can benefit from shade and vegetation

enhancement projects. Gathered input from Engineering, Operations, and Willamalane.

- Phase 1 of the Franklin Boulevard Redevelopment Project was completed. This redevelopment included re-landscaping an industrial corridor with vegetated round-a-bouts, vegetated park strips and medians with trees, and water quality facilities in and along the corridor. It includes three large infiltration swales, numerous other smaller street side infiltration swales, and pervious pavement. Phase 2 is funded. Design will resume soon and will be constructed. This will be the roundabout at Mississippi and Franklin.

- T3 - Manage Industrial Warm Water Discharges

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

Summary:

- Staff continues to review 1200z permits and Pollution Control Plans for industries in Springfield's jurisdiction when they become renewed or issued; there 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. 183 maintenance reminder postcards were sent out, 76 new facilities inventoried, 573 facilities inspected or re-inspected. 264 initial inspections with 117 found in non-compliance (both vegetative and structural).
- 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. Outreach BMP letters went out: 18 BMP Letters sent to Storage Facilities - 0 in UGB, 30 BMP Postcards mailed to Fire Sprinkler Line Flushing - 1 in UGB.
- 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. 32 pressure washing brochures went out at the home show last March. 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. BMP postcards were mailed to 3 Mobile Washers and 18 Pressure washers.

- T4 – Public Outreach and Education

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

Summary:

- Staff continues to revise and update existing education and outreach materials and participate in clean water classes in schools and community events such as: Clean Water University, Earth Day, Regional Pressure Washing Campaign, Fish Friendly Car Wash Kits, Public Works Week, and Lane County Home Show. This year some of the outreach venues were closed and the events did not take place because of COVID-19 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 FY22, 271 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. During the last reporting cycle, staff developed a virtual class. During this reporting cycle, virtual classes were held and a Macro Video was made.
- As mentioned above, staff chose to use social media much more this year and was able to cover multiple subjects even bringing in a couple new topics such as pesticides and, ice control, moss control, difference between wastewater and stormwater, and rain gardens.
- The Mill Race interpretive signs along the path continue to be maintained and provide educational information to the public.
- The pollution prevention educational portfolios were updated and restocked. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address warm water as a pollutant.

- 199 door hangers went out to various sites addressing pollution loading in certain areas. Some of these area and door hangers were to bring attention to the dumping of yard waste along waterways and vegetation loss.
- Car washing water not only contains warm water but also soaps, chemicals, and oils. In FY22 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 FY22, 183 O&M reminder postcards were mailed out.
- The City’s UpStream Art project had its sixth successful year. Advertisements, media spots, social media feeds, and staff interview all provided an opportunity to discuss stormwater pollution; the art as well sends a message out daily. It was highly publicized on our website and a virtual tour and story map showcases the sites.
- The City along with regional partners started a zinc study and education project. This project will focus on sources of zinc and identify educational opportunities. Zinc is mostly used by the general public to control moss. Too much vegetation and/or vegetation in the wrong place can promote moss growth causing the overuse of control agents. This project will include public education about how to prevent moss growth and also stormwater-friendly ways to remove it. The U of O student project concluded in June 2022 with a presentation on their findings.
- Under the MS4 Phase 2 General Permit there is a requirement to assess one education and outreach activity per year and include that assessment in the MS4 Annual Report. The assessment of one activity occurred in July of 2022, 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 annual billing insert was the subject of the Activity Assessment that is required by the MS4 Permit. This last assessment was done on the insert titled “*Good Habits for Good Habitats*” with over 34,000 inserts going out both hard copy and digital. This brochure discussed that the smallest actions of pollution at home have big impacts on our water recreation and habitat.

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

**Bacteria:**

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

2. Review relevant Springfield standard contracting specifications; amend as necessary.

Summary:

- SOPPs related to SSO procedures and protocols, and contractor provisions were reviewed with minor updates made in April 2021. The City continues to evaluate and adaptively manage its procedures and policies as needed, coordinating efforts with the other Development and Public Works divisional staff. In January 2022 three relevant SOPPs were updated and one discontinued.
  - SSO and SOPP procedures and protocols continue to be reviewed as needed and/or after an incident. Springfield continues to place high emphasis on providing the proper handling and reporting procedures to staff and regulatory agents in responding to any SSO within its jurisdiction.
  - Contractors working on new or existing sanitary systems under City supervision continued to be provided with information for proper reporting as part of the contractor provisions. A review was completed in 2021 that did not identify any needed changes.
  - IDDE and Operations staff continue to respond and address bacteria related discharges as they are identified. Staff responded to one public SSOs, and two private sanitary 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; three new stations were installed. Staff and partners continue to monitor existing stations, replenish bags, and evaluate new locations. A total of 8,700 bags were distributed by city staff during this reporting period. Station locations and O&M of stations are tracked in the PEO App.
- In previous years, pet parks, kennels, pet supply stores, and pet daycare facilities have been identified and outreach material developed. City staff continues to

work with facilities on waste handling and problem areas as needed. Staff updated the pet service providers list. Due to COVID-19 closures, staff did not visit any of the facilities; BMP postcard mailings went out to 16 pet care service providers.

- Pet supply stores have been identified and outreach material developed and continues to be distributed in stores. Educational material continues to be monitored, stocked, updated, and replaced as needed. 40 pet waste management brochures were distributed during this reporting period as part of the routine distribution, but some facilities were still closed 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, Canines for Clean Water pledge events, and Regional Pressure Washing Campaign. In FY22, staff was able to participate in five events, the Children’s Celebration, the Lane County Home Show, Oregon 22, Public Works Week, and Pet Fest. All other outreach was either done virtually or through social media.
  - The “Canines for Clean Water” program continues to be a success. Springfield residents submitted photos for the 2022 contest and pledged to pick up after their pet. The 2023 calendar contest drew 142 pledges and submissions. The contest was promoted through social media. One public booth event was held during the reporting period. Additionally, 381 bag holders, 93 bandanas, 0 business signs, and 17yard signs were distributed to the public. The Canines for Clean Water calendar continues to be a hit as well; 4,080 2022 calendars were distributed at local pet supply stores and other locations in FY22.
  - 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; No new signs were installed this reporting cycle.  
Staff re-explored the development of a wildlife ordinance February 2022. It was decided that education and outreach should remain the primary tool for encouraging the desired behavior.
- B3 - Septic Tank, Transient Camping & Private Sanitary Infrastructure Outreach & Edu
    1. Maintain septic tank inventory program; maintain inventory, update educational materials, and work with property owners to provide sanitary services where needed.
    2. Continue investigation into sanitary waste disposal practices; continue to identify targeted audiences.
    3. Review transient camping procedures; update as needed, work with property owners, and assess known sites.

### Summary:

- The septic tank inventory within the City limits is complete; sites continue to be added to the inventory when discovered or removed when connected to the City sewer system. The septic system inventory is now accessible via the City's mapping application (MapSpring).
- During this reporting period, four septic systems were decommissioned and connected to the City sewer system.
- The septic system guide for homeowners was updated in a previous reporting period and was mailed out to all property owners and residents in the City Limits. This reporting year staff did not send out maintenance reminder postcards; scheduled to occur in FY23. The brochure is available on our website and at the permit counter.
- Design work for the phase 2 project of Franklin Blvd. is in the works and will have the potential to greatly reduce septic systems along Franklin Blvd. as a sanitary sewer extension will be part of the process. Other sewer extension and rehab projects are in the design stage for the next couple FYs such as S 28<sup>th</sup> Street, 42<sup>nd</sup> to 48<sup>th</sup> Street Rehab, Jasper Trunk P3, S 37<sup>th</sup> Street, S 38<sup>th</sup> Street, Osage Street, Janus Street, Mill Street Rehab, 70<sup>th</sup> and 72<sup>nd</sup> Rehab, and 16<sup>th</sup> Sewer Repair.
- 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. FY20 was the last BMP mailing; FY23 the mailing will occur again on a biennial schedule.
- 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 8 sweeps and 2 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 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. 40 brochures were taken at local distribution sites.
- 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 year and last. In FY21 and FY22 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; seven signs were installed at various locations. This campaign focus on the small such as cigarettes butts, gum, wrappers, food, cans and bottles, plastic, disposable diapers, wipes, etc. Several meetings were held to determine a new outreach effort beyond the back of bus ads. Additionally, this last FY we developed and installed a wrap that went on the City Sweeper. The slogan for the wrap is: *Clean street, clean river; let’s trash little litter.*
- 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 & Pet Fest and the Olympic Trials Run Walk event were the only 2 in-person events that we were able to participate in due to COVID. The Children’s Celebration & Pet Fest distributed 200 Car Care brochures, 357 pencils, 50 frisbees, and 181 erasers, and the trials distributed 20 frisbees and 46 pens.
- Two illicit discharges that involved private sanitary waste systems were responded to and 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.

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

### **Mercury:**

- M1 - Limit Construction Site Erosion
  1. Continue to review and update the LDAP Program as needed.

#### Summary:

- The Land Drainage and Alteration Program (LDAP) staff continues to monitor and work on streamlining the permit process. A compliance review of the LDAP Program was completed 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, but since the MS4 General Permit also will require LDAP program and Erosion Code updates it was decided that holding off and doing all the Code updates per the MS4 Plan schedule was the best option.
- Springfield continues to implement a program that is in accordance with NPDES guidelines within the City Limits. Reporting data pertaining to permits is included in Springfield's MS4 Annual Report dated October 2022. During FY22 1133 inspections were completed. Sites requiring 1200-C coverage are referred to Oregon DEQ. Staff continues to post and distribute as needed related education and outreach materials on the City webpage.
- 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. 237 Permits Issued, 1133 Inspections Performed = 99.8% - no sites were out of compliance, and no enforcement actions were taken.

- M2 - Enhance Post Construction Support
  1. Continue Water Resources staff participation in plan review process.
  2. Continue to implement a private post-construction program.

#### Summary:

- Water Resource staff continues to be active in Development Plan Review, Pre-Development Review, and Pre-Construction meetings and process.

- A Water Quality Facility Inventory and Inspection Program to ensure long-term O&M of facilities is ongoing. Inventory 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 FY22 76 new facilities inventoried and 573 facilities inspected or re-inspected – both vegetated and structural. 264 initial inspections with 117 found in non-compliance (vegetated and structural). There were 183 WQF maintenance reminder postcards mailed out.
  - There were 45 public water quality structural facility inspections and 62 public vegetated facility inspections. These facilities are cleaned and inspected by Operations staff.
  - Water Resource staff currently participates in major infrastructure and Code update projects; currently staff is working through post-construction code updates that meet the MS4 permit requirements. Updates expected to take place in FY23.
  - Water Resource staff continued to map and track the presence of wellhead protection signs at locations that have water quality treatment and signage requirements; this is done as part of the Water Quality Facility Management Program, and wellhead protection signage tracking.
- M3 - Street Sweeping, Catch Basin, and Pipe Cleaning Programs
    1. Continue to implement current programs for sweeping, basin cleaning, and storm drainage pipe cleaning; adaptively manage program practices and standards.

Summary:

- Currently, three (3) FTEs and three (3) sweepers are budgeted to sweep the 370 curb miles of City streets. One mechanical Elgin Broom Bears sweeper is scheduled to sweep the residential streets seven times a year. Two (Schwartz and TYMCO) vacuum sweepers are scheduled to sweep arterials/collectors 22 times per year. Depending upon traffic patterns, some streets are swept weekly and others every two weeks. Over 4,510 cm of routine sweeping took place in FY22.
- 2,128 catch basins were cleaned with 107.5 tons of material removed. This currently works out to be 39.7% of publicly owned and operated basins. 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 3,700 feet of storm line was cleaned, 3,200 ft. of ditch /channel cleaning, and reshaping took place.
- The leaf pickup program resulted in 319 tons on 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.
  - Due to COVID-19, our two biggest mercury educational giveaways were either canceled or were rescheduled. Lane County Spring Home Show occurred in March '22 but was unstaffed out of an abundance of caution; Spring Clean-up was cancelled in FY21 and has been cancelled indefinitely as of May '22.
  - 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 had 2 re-certifications during this reporting cycle and 82 mailers went out.
  - Not all auto shops can achieve State Eco-Biz status but may qualify as a “Clean Water Business (CWBiz)” through the City program. Both programs promote recycling, and proper storage of hazardous material. 82 letters went out to auto shops and 12 to car wash facilities in Springfield’s jurisdiction. One auto facility was re-certified as a CWBiz.
  - The City of Springfield continues to monitor implementation of Best Management Practices for dental offices and installation of amalgam separators per the requirements of 40 CFR Part 441 - Effluent Limitations Guidelines and Standards for the Dental Category. This ongoing effort includes identifying and tracking of new and existing sources from dental dischargers and limit the discharge of mercury and silver bearing wastes into the regional wastewater collection system.
  - Dental facilities that commenced discharge after promulgation of the rule or have undergone a change of ownership are considered new sources and are required by the rule to submit a one-time compliance report within 90 days. The City of Springfield retains these certifications in accordance with the standard records retention protocol for the national pretreatment program. One regional drug take back round up event was held in October 2021 that the City participated in.
- 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.
- 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 183 reminder postcards were sent out this reporting cycle.
- The City's UpStream Art project had its sixth successful year. Advertisements, media spots, social media feeds, and staff interview all provided an opportunity to discuss stormwater pollution; the art as well sends a message out daily.

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

- Public Education and Outreach
  - PE1 - Public Education and Outreach Strategy (PEOS)
  - PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts

Summary:

- Springfield's Public Education program has been implemented since 2007. We have active programs addressing, bacteria, temperature, mercury, and general stormwater pollution prevention. We offer brochures, factsheets, booklets, public events, post stormwater pollution prevention tips on social media, and have a publicly accessible website with our outreach material(s). We have programs that address the listed target audiences in section A.3.a.iv. We implement at least two educational messages per year. Some of our largest programs are Canines for Clean Water, Pet Waste Stations, Clean Water Gardens, Clean Water Business, EcoBiz, Clean Water University, UpStream Art, Septic System Maintenance, and Little Litter. We either host or participate in regional events such as Earth Day, Public Works Week, and Home and Garden shows, where educational materials are handed out and the public is engaged in conversation. We are on track in

meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, drafted education and outreach strategies, updated Council and the public on stormwater pollution prevention, renewed our IGA with Lane County, completed our annual program review and assessment of one educational activity.

- Public Involvement and Participation

- PI1 – Public Involvement and Participation/Access

- PI2 – Public Involvement and Participation Stewardship/ Reporting

Summary:

- Springfield’s Public Involvement and Participation program has been implemented since 2007. We have active stewardship activities, a public process for SWMP and TMDL development, public process through Council and Springfield Planning Commission, and a website for both information and feedback, Codes, plans, and planning documents are also posted on the website and available for comment when relevant. We are on track in meeting our proposed MS4 Plan goals and timelines and have completed compliance reviews, maintained access and updated our public website, partnered on stewardship opportunities, and continued to comply with public notice laws.

- Illicit Discharge Detection and Elimination

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

- ID2 - MS4 Map

- ID3 – Dry Weather Screening Program

- ID4 – Non-Stormwater Discharge Assessment

Summary:

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

the Non-Stormwater Discharge Assessment Report and the Product Assessment document.

- Construction Sites Runoff Control

- CSW1 -- Erosion and Sediment Control Regulations

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

- CSW3 – Inspections and Enforcement

- CSW4 – City Staff Erosion Control Training

Summary:

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

- Post-Construction Site Runoff for New Development and Redevelopment

- DS1 – Post Construction Stormwater Management Code and Standards

- DS2 – Post Construction Stormwater Facility Long-Term Operation and Maintenance

- DS3 - Post Construction Stormwater Management Training, Tracking, an Assessment

Summary:

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

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

Summary:

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

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

### **Adaptive Management Measures**

The Implementation Tracking Matrix 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 submitted an updated 2019 TMDL Implementation Plan in June of 2022; the DEQ approved the new plan via an approval letter on September 14, 2022.

Implementation Matrix

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

Table 1 – 2019 TMDL Implementation Tracking Matrix

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing &amp; 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 &amp; 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 <sup>st</sup> review. By April 2023 2 <sup>nd</sup> review	A reviewed and updated priority list of potential sites.	1 <sup>st</sup> review and update are 100% complete. Staff finished working on related prep work such as basin delineation, MS4 outfalls, surface waters, WOTUS updates. Project list is scheduled for review again in 2023. The canopy shade assessment was updated this reporting cycle.	
				Engineering Division Water Resources Division	Update the existing inventory identifying potential sites.	By July 2021 – 1 <sup>st</sup> update. By July 2023 2 <sup>nd</sup> update			
			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 LTWC, and UWWP groups
			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.	100% as no Code changes needed updating at this time. Will incorporate Code changes into larger Post-Construction Code Update project per MS4 Plan by Feb 28 2024	
			Engineering Division Water Resources Division	Task 2 - Mill Race restoration, management and enhancements	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.	1 <sup>st</sup> review/update 100% complete; list reviewed and updated. vegetation management 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% for reporting FY21, FY22 - 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. FY22 100% complete, outreach to 2 business categories.	

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing &amp; 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 &amp; completion</i>	STATUS
	Public Interaction	T4 – Public Outreach and Education	Task 1 - Continue to review, develop, and distribute outreach and education materials to the public.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY
				Water Resources Division		By June 2020 and By June 2023	Educational material assessed.	100% complete; by July 2020 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	100% complete – 4 SOPPs updated
			Task 2 - Review contractor work provisions to ensure contractors understand Springfield's requirements for dealing with sanitary sewer spills.	Engineering Division Water Resources Division	Conduct review of relevant Springfield standard contracting specifications.	By April 2021	Review of contract specifications	100% 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 – updates to contact information made.
	Animal/Pet waste	B2 - Animal/Pet Waste - Program Enhancement	Task 1 - Coordinate with local partners to identify additional locations for pet waste disposal stations in public areas and assist with placement and maintenance.	Water Resources Division	Continue to collaborate with local partners to identify additional prospective pet waste stations.	By April 2020 and By April 2022	Update and maintain a list of possible locations.	1 <sup>st</sup> round 100% complete – contacted Willamalane, School District, and OPS 2 <sup>nd</sup> 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 <sup>st</sup> round 100% completed – one station replacement. 2 <sup>nd</sup> round 100% complete – three new stations installed.
				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.
				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 – 2 reviews and updates completed
				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. 100% complete this reporting FY; letters sent to 16 businesses.
			Task 2 - Continue identification of pet care providers and services and identify outreach opportunities.	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 Options assessment was completed twice.
				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 in person pledge event and calendar photo contest with online pledges held.

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing &amp; 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 &amp; completion</i>	STATUS
Bacteria			Task 4 - Wildlife feeding outreach and education.	Water Resources Division	Continue to coordinate with partners such as the park district and City Operations staff to identify locations of wildlife feeding, and if appropriate post signs.	By April 2021 and by April 2023	Updated list of locations. If appropriate, the number of new signs installed.	100% complete this reporting FY. Additional location identified.
				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.
				Water Resources Division	Continue to explore adopting a wildlife feeding ordinance.	By April 2022	Review done and options investigated.	100% complete – review and investigation completed.
	Sanitary wastes	B3 - Septic Tank, Transient Camping and Private Sanitary Infrastructure Outreach and Education	Task 1 - Maintain a septic system inventory for sites within the City limits; work with property owners to provide public sanitary services when feasible. Review, update, and deliver educational material as appropriate.	Water Resources Division Information Technology	Continue to maintain a septic system inventory within the City limits.	Ongoing throughout the cycle	Updated septic system inventory.	Ongoing; 100% complete this reporting FY, inventory updated.
				Engineering Division	Continue to -work with property owners within the City limits to provide public sanitary services when feasible. Continue to incorporate and extend services as appropriate.	Ongoing throughout the cycle	Properties within the City Limits connected to public system, as appropriate.	Ongoing; 100% complete this reporting FY – 4 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.
				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 – program description updated
				Water Resources Division Community Development Division	Work with landowners and regional partners, as needed, to enforce illegal camping regulations on private property.	Ongoing throughout the cycle	Enforcement of illegal camping that may impact open waterways.	Ongoing – 100% complete - enforcement a combination of IDDE and Code Enforcement.
				Water Resources Division Operations Division	Assess known campsites on public land and update the priority list for removal. Continue to investigate campsite deterrent measures.	By July 2020 and by July, 2022	Assess known illegal camp sites and updated priority list.	100% complete this reporting FY; 8 sweeps with 2 camps cleaned.
	Public Interaction	B4 – Public Outreach and Education	Task 1 - Continue to review, update, develop, and distribute outreach and education materials to the public, as needed.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY.
				Water Resources Division		By June 2020 and by June 2023	Educational material assessed.	100% complete; by July 2020 all PE materials reviewed and some material updated. Next review will take place in 2023
	Mercury	Construction site soil erosion	M1 - Limit Construction Site Erosion	Task 1 - Continue to review existing LDAP construction site erosion control program.	Engineering Division	Staff will review the LDAP program to determine if program revisions, enhancements, or modifications are appropriate.	Review by April 2021 and update by July 2022, if appropriate.	Current program reviewed and updated, as appropriate.
Engineering Division					Refer construction activity within Springfield's jurisdiction that requires 1200C permits, to the Oregon DEQ.	Ongoing throughout the cycle.	Tracking of 1200C permit referrals.	100% complete this FY – tracking/referring maintained
M2 - Enhance Post Construction Support			Task 1 - Continue Water Resources staff participation in the City's development plan review process.	Engineering Division Water Resources Division	Continue involvement by engaging in the review process for proposals requiring engineering review and/or smaller scale developments that include water quality or LIDA.	Ongoing throughout the cycle	Involvement in the review process for developments having WQ and/or LIDA proposals.	Ongoing - 100% complete this reporting FY

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing &amp; 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 &amp; completion</i>	STATUS
Mercury				Engineering Division Water Resources Division Community Development Division	Continue to provide assistance, as needed, in the review and update of design standards and or codes as they relate to water quality facilities and post-construction development requirements.	Ongoing throughout the cycle	Involvement in the review and updating of design standards and or codes as they relate to water quality facilities and post-construction development requirements	Ongoing – 100% complete this reporting FY; planning efforts for code review and identifying gaps in process.
			Task 2 - Continue to implement a post-construction BMP inspection program to ensure maintenance of water quality facilities at private sites.	Water Resources Division	Review program, adaptively manage, update as needed.	By April 2022	Assessment/review of program; updated as appropriate.	100% complete; program documents reviewed and updated.
				Water Resources Division Engineering Division	Continue program implementation within resource limitations.	Ongoing throughout the cycle	Continue implementation of a 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; 4,510 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; 39.7% 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
	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 Next review and update in 2023.
			Task 2 - Use household waste collection events to encourage proper disposal of items containing mercury.	Development and Public Work Department	Springfield will continue to participate in and support events involving hazardous waste.	Ongoing throughout the cycle	Participate in public collection events and promote Lane County Hazardous Waste Collection Center.	Ongoing; 100% complete; Drug take back, and referrals made. Very minimal as COVID-19 closures were in place.
	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 Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle By June 2020 and By June 2023	Material distribution will be ongoing throughout the plan cycle. Twice during the cycle, educational material assessed.	Ongoing – 100% complete this reporting FY. 100% complete; by June 2020 all PE materials reviewed and some material updated. Next review and update in 2023.
	Mercury and Other Pollutants	**Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#1 Public Education and Outreach	Task 1 - PE1 - Public Education and Outreach Strategy (PEOS)	Water Resources Division	Draft a Public Education and Outreach Strategy. Continue to update Council and Commission as needed. Review and update as needed, the IGA with Lane County on NPDES Services.	By June 30, 2022 Ongoing throughout the cycle By July 1, 2022	Strategy drafted and implemented. At least one time annually on program implementation. IGA with Lane County on NPDES Services drafted and implemented.

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing &amp; 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 &amp; completion</i>	STATUS	
Mercury and Other Pollutants	**Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	Task 2 - PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts	Water Resources Division	Targeted public education and outreach implementation; distribute educational message to targeted audiences.	Ongoing throughout the cycle	A minimum of one educational message to each audience annually.	100% complete, we conducted: 32 interactions of which 29 included people from the UTZ; these covered all the audiences.		
				Develop program review template and assess progress toward program implementation annually.	By June 30, 2022 template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.		
				Develop an education and outreach activity assessment; conduct one activity assessment per year.	By June 30, 2021	Assessment of one education and outreach activity per/yr. in the Annual Report.	100% complete; a template was developed and an assessment of one activity was completed – included in the MS4 annual report.		
				Continued activity tracking, include a summary of the program review and assessment of one education and outreach activity per/yr. in the Annual Report.	By Nov 1 annually	Activity assessment and program review included in annual reports.	100% complete; ongoing tracking, submittals, and reporting.		
		#2 Public Involvement and Participation	Task 1 - PI1 – Public Involvement and Participation/Access	City of Springfield	Continue to implement a public participation process.	Ongoing throughout the cycle	Continue to provide opportunities for public input on the stormwater programs in various forms.	Ongoing – 100% complete this FY. Website access and posting of MS4 Plan and Annual Reports.	
				Environmental Services	Review the required MS4 General Permit website posting requirements and update as needed.	By June 30, 2022	Review completed and website updates implemented.	100% complete; a website compliance review was completed and updated made as necessary.	
			Task 2 - PI2 – Public Involvement and Participation Stewardship/ Reporting	Environmental Services	Continue facility enhancement projects and researching project opportunities. Continue to make program enhancements.	Ongoing throughout the cycle	Implementation of at least one stewardship opportunity during the 5-year term.	100% complete; participated and partnered with regional partners on 6 events.	
					Develop program review template and assess progress toward program implementation annually.	By June 30, 2022, for template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.	
			#3 Illicit Discharge Detection and Elimination	Task 1 – ID1 - Illicit Discharge Ordinance, Response, Enforcement, and Tracking	Development and Public Works	Continue to respond, enforce, and track illicit discharges and complaints.	Ongoing throughout the cycle	IDDE incidents responded to, enforced and tracked.	Ongoing– 100% complete this FY.
					Water Resources Division	Perform a review of the response and enforcement program at least once during the permit term and update as needed.	One time during the permit cycle	Review of the response and enforcement program completed.	100% complete; a compliance review was completed and SOPP's and program documents updated as needed.
		Water Resources Division			Develop program review template and assess progress toward program implementation annually. Summarized IDDE tracking information.	By June 30, 2022, for template Nov. 1 annually for program review and tracking information	Template developed and annual program review completed. Summarized IDDE incident tracking reported.	100% completed; a template was developed, and program review completed.	
		City of Springfield			Continue to implement and enforce an ordinance and/or other regulatory mechanisms to prohibit illicit discharges to the MS4.	Ongoing throughout the cycle.	Continued implementation of IDDE ordinance.	Ongoing– 100% complete this FY.	

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Mercury and Other Pollutants	**Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#3 Illicit Discharge Detection and Elimination (continued)		Water Resources Division and City Attorney's Office	Conduct a review of the existing enforcement mechanisms and update as necessary to meet the conditions of the MS4 Modified General Permit. If updates are identified take to Council for adoption by the end of the permit term, as necessary.	One time during the permit cycle.	Review of the existing enforcement mechanisms and updates as necessary completed.	90% complete; IDDE code review completed, and updates drafted, will take to Council in FY23.	
				Water Resources Division	Continue to implement IDDE enforcement procedures and enforcement matrix while a review of the enforcement matrix is conducted.	Ongoing throughout the cycle.	Continued implementation of IDDE enforcement procedures and enforcement matrix.	Ongoing and 100% completed. The matrix was reviewed and updated. Implementation is ongoing.	
					The review and updates of the matrix, if needed, completed by, and submitted with the third annual report.	By November 1, 2023, the MS4 Modified General Permit extended this "by date" to the end of the permit term, February 28, 2024, if needed.	IDDE enforcement matrix submitted to DEQ.	100% completed. The matrix was reviewed and updated. Implementation is ongoing, and matrix submitted with MS4 Annual Report.	
			Task 2 – ID2 - MS4 Map	Technical Services Division	Continue ongoing GIS mapping and inventory of Springfield's MS4 storm system infrastructure(s).	Ongoing throughout the cycle.	Ongoing mapping of City storm infrastructure.	Ongoing – 100% complete this FY - City GIS infrastructure updates are ongoing as new development occurs.	
				Technical Services Division and Water Resources Division	Review mapping and inventory requirements as listed in the MS4 Modified General Permit and identify mapping gaps.	By Feb 28 2024	Updates to mapping gaps completed.	100% complete – gaps identified, and updates completed.	
				Development and Public Works	Perform any in-field or desktop data gathering as needed to incorporate information in the UGB expansion areas and finish re-defining storm system basins.	By Feb 28 2024	Field work, if needed completed and storm basins redefined.	90% complete – LWI in review by State, WHA under contract – expected to be completed in FY23.	
				Technical Services Division and Water Resources Division	Dry-weather priority point locations will be identified under ID3 – Dry-weather Outfall Screening and incorporated into a mapping layer.	By Feb 28 2024	Dry-weather priority point locations identified, and mapping layer developed.	80% complete – MS4 outfalls identified, and staff is currently identifying priority locations. Will be completed in FY23.	
				Water Resources Division	Submit MS4 map to the DEQ.	By goal date November 1, 2022 (third annual report); MS4 Modified General Permit extended this to the end of the permit term, February 28, 2024, if needed.	MS4 map submitted to DEQ	100% completed - MS4 map digital links provided to DEQ in MS4 Annual Report.	
				Task 3 - ID3 – Dry Weather Screening Program	Water Resources Division	Develop a dry-weather screening program; identify outfalls and priority locations and have the program ready to implement field screening of outfalls.	June 30, 2022 – draft program/ locations June 30, 2023 – begin screening MS4 Modified General Permit extended this to the end of the permit term, February 28, 2024, if needed.	Dry-weather program drafted and begin screening.	100% completed – Dry-weather Screen Program drafted. 50% completed – staff started screening in FY23 to meet the 40% requirement by February 28, 2024.
						During the third fiscal year begin outfall screening to achieve 40% of the MS4 outfalls screened.	By the end of the permit term.	Achieve 40% of the MS4 outfalls screened.	This task is to start in FY23.
			Development of a pollutant parameter action level list.			By November 1, 2022.	List developed and submitted to DEQ.	100% complete – PPAL list has been developed and submitted in the MS4 Annual Report.	

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Mercury and Other Pollutants	**Non-point Source Stormwater Runoff – MS4 General Permit Control Measures			Development and Public Works	Develop an IDDE training strategy, which is part of a larger internal staff training strategy.	By June 2022 strategy completed.	At least once during the permit term persons involved in IDDE program implementation are trained.	IDDE training 100% complete, updates and incorporation into the larger strategy will take place in FY23.		
					Ongoing implementation of the Non-Stormwater Discharge Assessment Evaluation and the Product Assessment reports.	Ongoing throughout the cycle.	Ongoing implementation of reports.	Ongoing – 100% completed this FY22.		
			Task 4 - ID4 – Non-Stormwater Discharge Assessment	Water Resources Division	Review the Non-Stormwater Discharge Assessment Evaluation, update as needed.	By June 30, 2022	Non-Stormwater Discharge Assessment Evaluation, update as needed.	100% complete – assessment document reviewed and updated to meet the MS4 General Permit allowable discharges.		
					Review the Non-Stormwater Discharge Product Assessment, update as needed.	By June 30, 2022	Non-Stormwater Discharge Product Assessment, update as needed.	100% complete – assessment document reviewed and updated.		
	**Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#4 Construction Site Runoff Control	Task 1 – CSW1 – Erosion and Sediment Control Regulations		City of Springfield	Continue to implement existing Municipal Code and Springfield Development Code provisions for construction activities.	Ongoing throughout the cycle.	Continued implementation of Municipal Code and Springfield Development Code provisions for construction activities.	Ongoing – 100% completed this FY22.	
						Review the existing LDAP Program and City codes to ensure that construction project sites that result in a minimum land disturbance of 7,000 sq.ft. meet the requirements listed in the MS4 Modified Permit.	By June 30, 2022	Review completed.	100% completed – a compliance review was done, a code update team identified sections needing updates.	
						Updates, as needed, to existing codes and standards to ensure compliance.	By February 28, 2024	Updates to code/standards, if needed.	50% completed – on track to meet timeline for updates.	
						Verify current process for referral compliance with other NPDES permits for construction projects that disturb one or more acres (or that disturb less than one acre but are part of a common plan of development).	By June 30, 2022	Process reviewed and verified.	100% completed – 1200C referral process in place. 1200CA was just updated in FY23 and in place.	
						Continue DEQ referrals as appropriate.	Ongoing throughout the cycle.	Continued DEQ referrals as appropriate.	Ongoing – 100% completed FY22.	
						Ongoing implementation of LDAP Program runoff controls and site plan review.	Ongoing throughout the cycle	Continued implementation of LDAP Program runoff controls and site plan review.	Ongoing – 100% completed FY22.	
			Task 2 – CSW2 – Land Drainage Alteration Permit (LDAP) Program			Community Development Division	Review existing erosion and sediment control site plan requirements and process to ensure compliance with MS4 Modified General Permit Erosion and Sediment Control Plan requirements and Plan Review Process.	By June 30, 2022	Review of ESC site plan requirements completed.	100% completed – compliance review completed FY22.
							If needed, update requirements for erosion and sediment control site plan requirements and plan review process; take to Council for adoption if appropriate.	By February 28, 2023 (Modified General Permit extended to Feb. 28, 2024).	Updates taken to Council, if needed.	On track in meeting timeline.
						Community Development Division	Continue to track, enforce, and inspect construction sites and investigate and enforce construction related nuisance violations throughout the permit term.	Ongoing throughout the cycle.	25% of construction sites that disturb less than one acre are inspected at least once during the permit term.	100% complete FY22 – 237 Permits Issued 1133 Inspections Performed = 99.8%.

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Mercury and Other Pollutants	**Non-point Source Stormwater Runoff – MS4 General Permit Control Measures				Review the inspections and enforcement procedures and if needed, update procedure requirements and components; take to Council for adoption if appropriate.	Review by June 30, 2022 Updates if needed, by Feb 28, 2024	Review completed and updates taken to Council.	100% completed – compliance review completed FY22. Updates on track to meet timeline.
					Review and update as needed, the enforcement matrix and submit to the DEQ.	By the third annual report (November 1, 2023, Modified Permit extended this to February 28, 2024, if needed).	Enforcement matrix reviewed, updated, if needed and submitted to DEQ.	100% completed – matrix submitted in MS4 Annual Report. If updates are made will re-submit.
			Task 4 – CSW4 – City Staff Erosion Control Training	Community Development Division	Continue to maintain a comprehensive and professional level of erosion control training for LDAP staff.	Ongoing throughout the cycle.	Training maintained.	Ongoing – 100% completed this FY22 – staff-maintained certification.
				Water Resources and Community Development Division	Develop an Erosion and Sediment Control Education and Training Strategy, which is part of a larger strategy for training internal staff.	June 30, 2022	Provide training, at least once during the permit term, to persons involved in ESC program implementation.	100% completed FY22, incorporation into a larger strategy in FY23.
				Environmental Services and Community Development Division	Increase outreach and education to the private sector through activities such as the development and distribution of factsheets, brochures and through mailings.	Ongoing throughout the cycle.	Part of PE2 - Public Education and Outreach on Pollution Prevention and Stormwater.	See Task 2 - PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts. 100% complete FY22 – education and outreach material on City Website maintained, reviewed and have planned updates.
				Water Resources Division	Develop program review template and assess progress toward program implementation annually.	By June 30, 2022, for template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.
			**Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#5 Post-Construction Site Runoff for New Development and Re-Development	Task 1 - DS1 – Post Construction Stormwater Management Codes and Standards	Community Development Division	Continue to implement existing post-construction requirements and site plan review process for development and redevelopment.	Ongoing throughout the cycle.
		Review, as needed, ▪ Existing Post-Construction codes/standards ▪ Barriers to low impact development ▪ Site plan review process(s) and ordinance Retention, treatment, and mitigation				By February 28, 2024	Post-construction code and standards review completed.	100% complete – review identified gaps and needed updates.
		Draft findings and take to Council, as needed.				By September 1, 2023 - Modified Permit extended to Feb 28, 2024.	Findings drafted and taken to Council if needed.	Updates on track to meet timeline.
	Task 2 - DS2 - Post Construction Stormwater Facility Long-Term Operation and Maintenance	Water Resources Division			Continue implementation of the WQF Management Program which includes inventory, site inspections as well compliance actions to MEP.	Ongoing throughout the cycle	Continued WQF Management Program implementation.	Ongoing – 100% completed FY22. 183 postcards, 573 inspected, 264 initial inspections and 117 in non-compliance (vegetated and structural)
		Community Development Division and Water Resources Division			Review Dev. Code and EDSPM language and see if updates to O&M language are warranted.	Review by June 30, 2022 Updates, if needed by February 28, 2024	Review completed and taken to Council if needed.	100% complete – code section was reviewed, and no changes needed. This section might get updated when other Dev. Code updates occur by Feb. 28, 2024.

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Mercury and Other Pollutants				Water Resources Division	Review Water Quality Facility Management Program; identify any refinements. Update as needed.	By February 28, 2024	Water Quality Facility Management Program review completed.	100% complete – the WQF Mgt. Program documents were reviewed and updated FY22.
			Task 3 - DS3 – Post Construction Stormwater Management Training, Tracking, and Assessment	Water Resources Division	Develop a Post-Construction Runoff Education and Training Strategy, which is part of a larger internal staff training strategy.	June 30, 2022	Provide training to persons involved in program implementation at least once during the permit term.	100% completed FY22, incorporation into a larger strategy in FY23.
					If a post-construction runoff control certification becomes available in Oregon, seek funding to have relevant O&M inspection staff certified.	Ongoing throughout the cycle	Seek funding to have relevant O&M inspection staff certified.	Ongoing – NA nothing available.
					Develop post-construction program review template and assess progress toward program implementation.	By June 30, 2022, for template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.
	**Non-point Source Stormwater Runoff – MS4 General Permit Control Measures	#6 Pollution Prevention and Good Housekeeping for Municipal Operations	Task 1 - OM1 – Routine Maintenance Operations for Water Quality	Operations Division	Continue to implement routine infrastructure maintenance activities to reduce stormwater pollution throughout the permit term to MEP.	Ongoing throughout the cycle.	Continue to implement routine infrastructure maintenance activities.	Ongoing – 100% completed FY22.
					Draft a Maintenance Strategy for stormwater controls, include catch basin and litter management.	By June 30, 2022	Draft strategy drafted and implementation started.	95% complete – Operations has a current strategy in place for SW controls. Staff has reviewed the permit requirements and identified gaps pertaining to program guidance. Drafting of such document(s) will occur in FY23.
					Annually inspection of the owned or operated catch basins and clean as needed, Maintain inspection and cleaning records.	By November 1 annually and by Feb 28 2024	Annually inspect at minimum 10% of the owned or operated catch basins and clean as needed, with a goal to meet 50% at least once in the permit term.	100% on track – FY22 = 2128 cb’s cleaned/inspected 107t removed = 39.7%
			Task 2 - OM2 -- Pollution Control Manuals and Guidelines for City Operations	Operations Division	Continued implementation of the Pollution Control Manual for Routine Maintenance Activities, and other stormwater pollution guidance manuals and/or documents to minimize impacts to stormwater runoff.	Ongoing throughout the cycle.	Continued implementation of the Pollution Control Manual and guidance documents.	Ongoing – 100% completed FY22
					Water Resources Division and Operations Division	Develop a review and update schedule for pollution reduction and control guidance documents.	By February 28, 2024	Goal to review and update, if needed, at least two documents a year.
			Task 3 - OM3 – Municipal Operations Training, Tracking, and Assessment	Water Resources Division and Operations Division	Review regulations and determine if any City facilities with industrial activity as defined in 40 CFR §122.26(b)(14) need coverage under NPDES Industrial Stormwater Permit.	By June 30, 2021 By June 30, 2022	Review completed and findings drafted.	100% complete – 1200Z Determination completed in January 2021.
					Develop a Pollution Prevention in Municipal Operations Staff training strategy which will be part of a larger staff training strategy.	June 30, 2022	Provide training to persons involved in program implementation at least once during the permit term.	100% completed FY22, incorporation into a larger strategy in FY23
					Develop a pollution prevention and good housekeeping program review template; assess progress towards implementation of the program.	By June 30, 2022, for template Nov. 1 annually for program review	Template developed and annual program review completed.	100% completed; a template was developed, and program review completed.

\*\* Note that all MS4 BMP tasks, goals, and benchmarks are based on Springfield’s proposed MS4 Plan and have not been accepted by the DEQ as of this Annual Report.

