

CITY OF SPRINGFIELD, OREGON

DEVELOPMENT AND PUBLIC WORKS DEPARTMENT
ENVIRONMENTAL SERVICES DIVISION



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October 27, 2025

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

RE: City of Springfield's 16th Year TMDL Annual Report for Fiscal Year 2025

Dear Heather Tugaw,

Enclosed, please find the City of Springfield's 16th Year Annual Report for our TMDL Implementation Plan. This report includes a summary of our implementation efforts for the reporting period of July 1, 2024 through June 30, 2025.

Springfield anticipates continuing our efforts to comply with our approved TMDL Implementation Plan through the next reporting period. No adaptive management amendments are requested as a part of this annual report.

Springfield's 2024 TMDL Implementation Tracking Matrix includes our MS4 Phase II General Permit control measures, as required by the revised Willamette Basin Mercury TMDL. Our MS4 Plan was approved by DEQ on April 7, 2023.

We look forward to your review and response.

Sincerely,

Nancy Newton
City Manager
City of Springfield
225 Fifth Street
Springfield, OR 97477

Enclosures: Springfield's FY25 TMDL Annual Report
Springfield's FY25 MS4 General Permit Annual Report

CC: Priscilla Woolverton, Upper Willamette TMDL Basin Coordinator Western Region, DEQ
Matt Stouder, Environmental Services Division Director, City of Springfield

MS4 Stormwater Program Coordinator, DEQ
ESD electronic file, City of Springfield

City of Springfield

TMDL Implementation Plan 16th Year Annual Report 24-25



Submitted October 2025 for July 1, 2024 through June 30, 2025

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Attachments

TMDL Implementation Tracking Matrix

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 March 2024 (accepted by the Oregon Department of Environmental Quality (DEQ) on June 5, 2024) and Oregon Administrative Rule (OAR) 340-042-0080 (3) addressing non-point source pollution.

This is Springfield’s sixteenth Annual Report and the first submitted under the 2024 TMDL IP (see Table 1 for all plans and reports). Its 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.

Table 1: Implementation Plans and Annual Reports

TMDL	Submittal	Approval	Annual Reports Submitted
2009 TMDL	4/15/2009	4/16/2009	1 st , 2 nd , 3 rd , 4 th 5-year review
2014 TMDL	3/2014	2014	6 th , 7 th , 8 th , 9 th 5-year review
2019 TMDL	6/28/2019	7/19/2019	11 th , 12 th , 13 th , 14 th
2019 TMDL – Mercury Update	6/29/2022	9/14/2022	5-year review
2024 TMDL	3/14/2024	6/5/2024	16 th
2024 TMDL – Temperature Update	Draft due 5/9/2026; Final due 11/9/2026		

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

Background

The Oregon DEQ sets 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 rivers.

OAR 340-042-0025 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 TMDL for Mercury in the Willamette Basin, Oregon on February 4, 2021.

Regulatory Context

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

Reporting Requirements

This Annual Report is required to include the progress and/or status of Springfield's 2024 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.

The Implementation Tracking Matrix (Attachment 1) provides information about each strategy, implementation methods, and progress or status in meeting the plan's goals.

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

Springfield's MS4 Phase II General Permit expired on February 28, 2024, and is currently under administrative extension.

Springfield’s general permit stormwater management plan (MS4 Plan), which identifies measurable goals and timelines, was approved by the DEQ on April 7, 2023. Specific sections of Attachment 1 relating to Non-Point Source Stormwater Runoff – MS4 General Permit Control Measures identify general permit measurable goals in addition to our 2024 TMDL IP current goal status.

The City is continuing to implement existing programs and further projects and goals under the 2024 TMDL IP. Some current projects and programs the City undertakes do not have a listed goal or directly related task, therefore, the City is including additional “Related Accomplishments” to address the City’s WLA for temperature, bacteria, and mercury.

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 Attachment 1 TMDL Implementation Tracking Matrix for completion status.

TEMPERATURE

Strategy T1 – Potential Shade & Natural Resource Area Enhancement Planning

Task 1 - “Plan, design, and track riparian/channel enhancement capital projects.”

- Track data for completed waterway enhancement CIP projects such as length of riparian area restored and number of trees and shrubs planted (ongoing).
 - No CIP projects completed in FY25.
- Explore options to dedicate staff time to waterway enhancement and project delivery within the CIP program by March 2029.
 - One meeting in April 2025 with City Engineer and Managing Civil Engineer where adding staff and/or dedicating existing staff time to stream restoration and stormwater projects was discussed. Also met with Senior Civil Engineer to discuss workload and options.
- Continue Lower Mill Race stormwater and restoration project planning by April 2027, with a Planning Study drafted by March 2029.
 - Not started
- Work with private landowners to acquire property or easements along the Lower Mill Race, where feasible, by March 2029.
 - Not started

Task 2 - “Modernize and maintain Goal 5 natural resource area mapping.”

- Update Goal 5 natural resource inventory mapping by March 2027.

- The City’s GIS team is working on updating the map of natural resources. In FY25, the GIS team developed a new Natural Resources Application for internal staff. This application includes Springfield’s Natural Resources Study, links to relevant code, and explanations of how to use the map.

Strategy T2 – Riparian Area, Parking Lot & Streetscape Shade Protection & Enhancement

Task 1 - “Take protections for Goal 5 natural resources inventoried in Springfield’s UGB expansion areas to City Council for adoption. Clarify Springfield Development Code Goal 5 protections and update adopted land use plans for new protections, as needed.”

- Take protections for significant Goal 5 natural resources areas inventoried in the UGB expansion areas to City Council for public hearing by January 2028.
 - DSL approved Springfield’s UGB Expansion Areas Local Wetland Inventory on 5/22/25.
- Clarify Development Code Goal 5 protections and take to City Council for public hearing by January 2028.
 - Not Started

Related Accomplishments:

- A new guidance document was created to help internal staff review applications that may impact wetlands and other natural resources. This helps ensure notice to state agencies, includes code references, etc. Training for internal staff on local, state, and federal natural resource protection is planned for FY26.
- Starting in FY21, in the newly expanded UGB areas, wetlands, riparian areas, and wildlife habitat were identified and assessed to determine local significance. This project was supported, in part, by grant funds. In FY21, the local wetlands inventory was submitted to DSL for their initial review, and in FY23, a revised local wetlands inventory was submitted to DSL. Elected and appointed officials confirmed that Springfield will follow the Standard approach for protections.
- The Georgia Pacific Master Plan was adopted by the City in November 2021. The plan calls for the retainment of open space and trees. The City, Willamalane, and Springfield Utility Board entered into a long-term IGA in the spring of 2023 for the maintenance of the property. This group meets annually (1 meeting in FY25).

Task 2 - “Inventory and maintain public trees, review tree-related requirements in the Springfield Development Code, and explore application for Tree City USA recognition.”

- Work to complete an inventory of public trees by January 2026.
 - 127 street trees inventoried in FY25
 - 1 meeting 1/30/25
 - Explored using AI for the tree inventory.

- Continue to maintain public trees. Document maintenance activities and number of street trees planted by Operations annually.
 - 107 street trees planted in FY25
- Continue to budget for tree-related expenditures (ongoing).
 - Yes in FY25
- Review existing ordinances for public and private trees and identify revisions by January 2026. If code amendments are needed, take to City Council for public hearing by January 2029.
 - Reviewed local, regional, state, and national resources related to tree canopy preservation; and
 - Communicated and/or met with local, regional, and state agency partners regarding Springfield’s efforts to inventory, determine significance, and recommend protection programs for upland wildlife habitat (including oak woodlands) for Springfield’s 2019 UGB Expansion Areas, in conformance with Statewide Planning Goal 5.
- Explore creating a tree committee or department by January 2029.
 - 1 meeting 1/16/25
- Explore application for Tree City USA by January 2029.
 - 1 meeting 1/16/25

Related Accomplishments:

- Held three tree maintenance workshops in Springfield through the Urban Waters Partnership for City staff, Willamalane staff, local arborists, and the general public. Friends of Trees facilitated the workshops.

Task 3 - “Waterway maintenance and restoration.”

- Improve mechanisms for tracking the area of invasive plants removed and native trees and shrubs planted by March 2026.
 - 1 meeting 1/30/25 with Ops, GIS, and Water Resources
- Continue to maintain City-owned waterways (including the Mill Race) by removing invasive plants, maintaining flows, and planting native trees and shrubs (ongoing).
 - Hired Willama Restoration to remove blackberry along Jasper Slough (approximately 3500 square feet).
 - Removed blackberry along Swanson Reach of the Mill Race (9Wood SEP).
 - Number native trees and shrubs planted = 400 Day of Caring + 860 SEP + 200 Willamalane work parties = 1,460 total
- Draft a waterway maintenance plan by January 2029.
 - 1 meeting 1/30/25 with Ops, GIS, and Water Resources
- Explore funding options for adding staff dedicated to waterway maintenance by March 2029.

- 1 meeting 1/30/25 with Ops, GIS, and Water Resources
- Implement one public stewardship opportunity by March 2029.
 - Coordinated Day of Caring volunteer riparian planting along Jasper Slough (9/27/25).
 - 9Wood SEP (and 1 City staff work party mulching plants)
 - 2 volunteer riparian planting work parties with Willamalane

Related Accomplishments:

- Supported McKenzie Watershed Council with annual funding (\$5,000).
- Supported Long Tom Watershed Council with annual funding (\$5,000).

Strategy T3 – Industrial Warm Water Discharges

Task 1 - “Map NPDES industrial stormwater permit holder sites within Springfield’s City Limits. Review and provide comments to DEQ on industrial stormwater permits in Springfield when they are available for public review.”

- Review and update the map of current industrial stormwater dischargers within Springfield’s City Limits by July 2025 and again by July 2027.
 - Application updated with new fields for DEQ permits and outfalls. Data gathered from DEQ on industrial dischargers to Springfield waterways.
- Provide comments to DEQ during public review of industrial permits when they are issued or renewed (ongoing).
 - No new or renewed industrial permits were issued by DEQ in Springfield’s jurisdiction in FY25.

Strategy T4 – Public Outreach and Education

Task 1 - “Continue to develop and distribute outreach and education materials to businesses and the general public as needed.”

- Maintain website with annual updates of TMDL information and public outreach materials that focus on ways to reduce temperature (such as planting native plants and trees) and preventing warm water from entering the stormwater system (annual).
 - 2024 TMDL IP posted to website: <http://springfieldstreams.org>
 - Clean Water Garden webpage; Naturescaping brochure available on website.
 - Streamside Gardening information on website that includes tree and shrub planting for shade.
 - Stream Team webpage updated in FY25.
 - The Pools & Hot Tubs and Pressure Wash & Paint fact sheets are available on the website; these include information about preventing warm water from entering the stormwater system.

- The Good Habits for Good Habitats and Clean Water Starts at Home brochures are available on the website; these include information about tree planting for shade to reduce stream temperatures.
- Continue to develop and distribute outreach materials to businesses and to the general public (ongoing).
 - Pressure washing brochures: 31 at businesses + 2 at events = 33
 - Clean Water Biz mailing: 12 carpet cleaners + 39 pressure washers = 51
 - Naturescaping brochures: 106 at businesses + 53 at events = 159
 - 508 Good Habits for Good Habitats brochures distributed (at events)
 - 1 tree planting Facebook post that discussed temperature (3/27/25)

Related Accomplishments:

- Held 3 tree workshops for City staff, Willamalane staff, local arborists, and the general public. Workshops were in Springfield at City Hall and Willamalane’s Sports Center.
- 1 Friends of Trees tree and shrub giveaway in Springfield in FY25.
- Interpretive signs maintained along waterways that discuss shading.

The goals and tasks for temperature reduction as outlined in the 2024 TMDL IP are all on track.

BACTERIA

Strategy B1 – Sanitary Sewer Overflows – City Work Practices

Task 1 - “Continue to implement current City standard operating procedures for sanitary spill response. Amend or revise if appropriate to ensure rapid and effective response.”

- Implement SOPPs for sanitary spill response and update as needed (ongoing).
 - Staff responded to 4 public SSOs in FY25. IDDE and Operations staff continue to respond and address bacteria related discharges as they are identified.
 - SSO and SOPP procedures and protocols continue to be implemented. No updates identified. In 2022, three SOPPs were updated and one discontinued.
 - 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.

Strategy B2 – Animal/Pet Waste Program Enhancement

Task 1 - “Coordinate with local partners to identify locations for additional pet waste disposal stations in public areas and assist with maintenance. Maintain City-managed pet waste stations.”

- Continue to collaborate with local partners to identify additional prospective pet waste station sites by March 2025 and again by March 2027.
 - 12/16/24 and 5/25/25 partners contacted

- Continue to assist local partners with the maintenance of new and existing stations/sites by August 2025 and by August 2027.
 - 6000 bags to partners in FY25 (Willamalane and SPS)
- Maintain City-managed pet waste stations (ongoing).
 - 123 inspections in FY25
 - 8,000 bags FY25
- Continue to maintain an inventory of station locations (ongoing).
 - 1 station replaced in FY25
 - Map updated

Task 2 - “Continue to identify pet care providers and services in Springfield and provide outreach.”

- Continue to identify new pet supply, service, and care facilities within the UGB. Review and update the list of pet supply, service, and care facilities annually.
 - List reviewed and updated
- Continue to coordinate with pet businesses on educational material distribution and track the location and materials distributed (ongoing).
 - Canines for Clean Water brochures: 212 distributed to businesses + 40 brochures at events = 252 in FY25
 - 3500 Canines for Clean Water calendars (2025’s theme was One Water) distributed in FY25
 - 88 bandanas distributed in FY25
 - 158 poop bag holders in FY25
 - 43 scoop the poop yard signs in FY25
 - Materials were distributed at Springfield pet businesses and at events (Pet Fest, Lane County Home and Garden Show, UpStream Art, etc.)
- Continue to offer and provide technical assistance about pet waste management to pet businesses. Reach out to owners/operators at least twice during the Plan cycle by April 2025 and again by April 2027 and track facility participation.
 - 54 pet care businesses contacted through the Clean Water Biz Program
 - 0 pet businesses participating in the Clean Water Biz program

Task 3 - “Continue pet waste outreach and education at public events and distribute outreach materials.”

- Update outreach materials as needed and maintain website annually.
 - Created and distributed 2025 Canines for Clean Water Calendar, which encourages community members to scoop the poop.
 - Updated Canines for Clean Water webpage.
- Hold one Canines for Clean Water pledge event each fiscal year.
 - Canines for Clean Water booth held at Pet Fest at Island Park on 6/28/25.

- Online pledge drive (Canines for Clean Water photo contest for calendar) (March-April 2025): 128 total pledges
- Online + event pledges: 142 total pledges in FY25

Task 4 - “Discourage wildlife feeding through outreach and education.”

- Continue to coordinate with partners such as Willamalane Park & Recreation District and City Operations staff to identify locations where wildlife feeding is concentrated and, where appropriate, post signage. Reach out to partners and staff by March 2025 and March 2027.
 - Contacted partners in February 2025.
- Continue to track educational material distribution and update sign inventory on an ongoing basis.
 - The Animal Waste fact sheet was developed in FY24 and information about wildlife feeding was added.
 - This fact sheet is part of the IDDE educational portfolios and are distributed during IDDE response.
 - The Animal Waste fact sheet is posted on the website.
 - Wildlife feeding flats were provided at the Lane County Home Show, but none were taken.
 - No sign inventory updates (since no new signs installed).

Strategy B3 – Septic System Inventory & Outreach, Private Sanitary Outreach, & Transient Camping

Task 1 - “Maintain a septic system inventory within the City Limits. Review, update, and deliver outreach and educational materials to septic owners. Continue to extend municipal sanitary sewer services as appropriate.”

- Continue to maintain a septic system inventory within the City Limits; ongoing process throughout the five-year cycle (annual).
 - 6 septic systems connected to City sewer
 - 4 septic systems added to inventory
 - Map updated in FY25
 - 10 septic system decommissions (207, 247, 267, 287 N Concord and 250, 255, 269, 286, 288, 295 N Brooklyn St)
 - The septic system inventory is accessible via the City’s mapping application (MapSpring).
- Review, update as needed, and deliver outreach and education materials to private septic system owners twice during the five-year cycle by April 2025 and by April 2028.
 - Septic brochure, renter postcard, and owner postcard were updated in February 2025.
 - 3,562 brochures distributed in FY25

- Mailed out brochures in October 2024 and March of 2025 to properties on septic in the City Limits.
 - Brochures mailed out as a Rainbow Water District utility bill insert in FY25.
 - Brochures provided to the Lane County sanitarian and at City Hall in FY25.
 - 2,950 septic owner postcards mailed out in April 2025
 - 1,178 septic renter postcards mailed out in April 2025
- Continue to extend public sanitary services where feasible; ongoing throughout the five-year cycle.
 - Completed:
 - 16th Street; Mountaingate (35 ft) Emergency Sewer Repairs
 - 70th and 72nd St (14,930 ft) Wastewater Basin Rehab
 - In construction:
 - Mill Street
 - In design:
 - Aspen St and Harbor Dr pump stations
 - Jasper Trunk Phase 3 (5,280 ft); Pacific Ave (425 ft)

Related Accomplishments:

- The Wastewater Master Plan was adopted by City Council 9/16/24.
- P21181 S 37th Street, S 38th Street, Osage Street, and Janus Street Sewer Extension was completed in 2023.

Task 2 - “Continue to provide outreach and technical assistance to businesses to improve sanitary waste disposal practices.”

- Continue to identify private waste-generating businesses and activities. Develop and distribute outreach materials (as needed) which include best management practices, relevant regulatory requirements, and lists of resources for additional information. Two efforts will be made during this fourth Plan cycle by April 2025 and again by April 2028.
 - The Clean Water Biz program continues to address waste disposal practices and activities.
 - Clean Water Biz letters/postcards: 12 mobile washers; 39 pressure washers in FY25
 - Added RV & Boat Waste disposal fact sheet to the website (this is a new fact sheet that was developed in FY24).
 - The pollution prevention educational portfolios were maintained in key City vehicles. Some of the fact sheets address bacteria (Animal Waste and RV & Boat Waste). The IDDE staff continues to hand out these fact sheets during response.
 - The assessment of commercial bacteria waste was completed in a previous reporting period; it was reviewed and updated in FY20 and FY23.
 - 70 storage/business park postcards addressing washing and waste disposal mailed out to businesses in FY25

Task 3 - “Continue to remove litter and clean up transient camps along City-managed waterways.”

- Clean up litter and transient camps along waterways managed by the City and track the number of illegal campsites cleaned up and the pounds of material removed (annual).
 - 6 camps cleaned up in FY25
 - 13,000 pounds removed in FY25
 - IDDE and other City staff continue to report camps along waterways to Operations.
 - Camps cleaned up by Operations include those on the Main Stem Willamette, Mill Race, etc.

The goals and tasks for bacteria reduction as outlined in the 2024 TMDL IP are all on track.

MERCURY

Strategy M1 – Limit Construction Site Erosion

Task 1 - “Continue to implement and adaptively manage the existing Land and Drainage Alteration Permit (LDAP) construction site erosion control program.”

- Track the number of LDAP permits issued, inspections conducted, and enforcement actions within the City Limits and the Urban Transition Zone (annual).
 - 205 permits in City Limits; 3 in UTZ
 - 994 inspections in City Limits; 13 in UTZ
 - 0 of violations in City Limits; 0 in UTZ
 - 0 enforcement in City Limits; 0 in UTZ
- Distribute LDAP fact sheets annually and conduct outreach to construction site operators by April 2026.
 - LDAP fact sheets are distributed during field inspections and are available on the website. Fact sheets were updated in FY24.
 - Construction site operators working in Springfield were contacted in FY25.
 - LDAP slides continued on the TVs in City Hall.
- Update LDAP program manual to reflect current municipal codes, processes, and documents by April 2026.
 - New manual started (code, fact sheets, program guide, etc.)
- Conduct a review of the LDAP program to determine if revisions, enhancements, or modifications are needed. Complete review by April 2026 and, if needed, take applicable code sections to Council for re-adoption by July 2028.
 - Not started
- Refer construction activity within Springfield’s jurisdiction that requires 1200C permits to the Oregon DEQ (ongoing).

- 7 referrals

Strategy M2 – Enhance Post Construction Support

Task 1 - “Continue Water Resources staff participation in the City’s development plan review process.”

- Water Resources staff will continue to review and provide comments for development plans that include water quality or Low Impact Development (LID) features. Track the number of development applications reviewed (ongoing).
 - Water Resources continues to attend weekly Pre-Development Review Committee meetings.
 - 36 development applications reviewed by Water Resources staff in FY25

Task 2 - “Continue to implement a post-construction mapping and inspection program to ensure maintenance of water quality facilities at private development sites.”

- Ensure long-term functionality of private stormwater facilities through the continued use of maintenance agreements (ongoing).
 - Continued to require and collect maintenance agreements.
 - Revisions to the Notice of Operation and Maintenance Agreement and Operation and Maintenance Agreement were started in FY25.
- Map private water quality facilities and document the number of facilities mapped (ongoing).
 - 200 facilities mapped (vegetated and structural) in FY25
- Inspect private water quality facilities and document number of inspections (ongoing).
 - 186 inspections in FY25
- Continue program implementation within resource limitations. Review the Water Quality Facility Management program, adaptively manage, and update as needed by April 2026.
 - Started reviewing program and identifying needed changes (WQF prioritization for inspection and enforcement, etc.).

Task 3 - “Continue to implement a post-construction mapping, inspection, and maintenance program to ensure long-term functionality of public water quality facilities.”

- Map public water quality facilities and document the number of facilities mapped (ongoing).
 - 1 in FY25
- Inspect and maintain City-managed water quality facilities and document inspections and maintenance (ongoing).
 - 166 inspections in FY25
- Update public facility operation and maintenance plans by June 2028.
 - Not started
- Create operation and maintenance plans for new facilities (ongoing).
 - 3 in FY25

Strategy M3 – Street Sweeping, Catch Basin & Pipe Cleaning Programs

Task 1 - “Continue implementation of the current programs for street sweeping and catch basin and storm drainage pipe cleaning. Adaptively manage program practices and standards to enhance maintenance, as needed.”

- Continue implementation of routine street sweeping and storm system cleaning programs to reduce pollutants in the public right-of-way and drainage systems (annual). Track curb miles swept and linear feet of pipes cleaned (annual).
 - 9,360 curb miles swept in FY25
 - 2,027 linear feet of pipes cleaned in FY25
- Strive to inspect/clean at least 10% of City owned catch basins/inlets per year (annual).
 - 2,157 catch basins cleaned in FY25 (33.4%)
 - 158.77 tons of debris removed in FY25

Related Accomplishments

- Continued the Leaf Pick Up Program in FY25.
- Mailed 1,031 Stormdrain Cleaning Assistance Program postcards out to local businesses with private catch basins. This program is promoted through the regional Urban Waters Partnership, which includes Lane County, City of Eugene, etc.

Strategy M4 – Hazardous Waste Control

Task 1 - “Promote public household waste collection events to encourage proper disposal of items containing mercury.”

- Springfield will continue to participate in and support public events involving proper household hazardous waste disposal and recycling such as Spring Clean Up and home and garden shows. Ongoing throughout the five-year cycle.
 - Spring Clean Up was held in FY25, which is a City-wide recycling event with referrals to the Lane County Transfer Station as appropriate, including proper recycling of mercury containing materials.
 - Springfield participated in the Pollution Prevention Coalition (P2C) booth at the Lane County Home Show in FY25, which promotes hazardous waste disposal through the Lane County Transfer Station in Glenwood, including proper recycling of mercury containing materials.

Strategy M5 – Public Outreach & Education

Task 1 - “Continue to develop and distribute outreach and education materials to the general public, as needed.”

- Update outreach materials as needed and distribute to the general public (ongoing). Track material distribution (ongoing).

- 1 e-newsletter focusing on mercury disposal (Metropolitan Wastewater Management Commission (MWMC) newsletter)
- Information about proper recycling of mercury containing items is on the City's website through the Mercury Pollution Prevention brochure.
- The Lane County Transfer Station's hazardous waste recycling program is advertised in our fact sheets on Vehicle Leaks and Pressure Wash & Paint. These are available on the City's website and are given out during illicit discharge response and at public events.

Related Accomplishments:

- 508 Car Care for Clean Water brochures were distributed at Spring Clean Up, UpStream Art, and the Lane County Home Show. This brochure is also available on the website and contains information about proper recycling at the Lane County Transfer Station in Glenwood.
- The Water Quality Facility Management program educational materials continued to be distributed, including 229 maintenance postcards that were mailed out in FY25.
- The Eugene-Springfield Mercury Minimization Plan was approved by DEQ in FY25. This plan includes public outreach in the metro area promoting the proper disposal of mercury-containing items.
- Promoted the state-wide EcoBiz program (89 letters mailed out in FY25). The City's fleet shop was re-certified for EcoBiz in FY25.
- Promoted the City's Clean Water Biz program (276 postcards/letters mailed out to auto shops, mobile washers, pressure washers, nurseries, and pet care facilities in FY25).
- 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.
- LDAP fact sheets are available on the City's website and in hard copy.

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

▪ **Public Education and Outreach**

PE1 – Public Education and Outreach Strategy (PEOS)

- The PEOS was completed in 2022 and is updated every three months.
- 9 updates to City Council on stormwater outreach efforts and MS4 Plan activities in FY25.
- Updated the IGA for NPDES stormwater services with Lane County and signed it in FY25. City Council was updated as well.

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

- Developed education programs that address the listed target audiences in our MS4 Phase II General Permit Schedule A.3.a.iv. In addition, we have active outreach programs addressing bacteria, temperature, mercury, and general stormwater pollution prevention. We updated our LDAP fact sheets in FY24, which are available on the website and in hard copy.
- Offered educational brochures, fact sheets, booklets, postcards, and other outreach materials at public events, City facilities, and on our website. We regularly post stormwater pollution prevention tips on social media. Our website is publicly accessible and advertised through our outreach materials. We implement at least two educational messages per year. Some of our largest programs are Canines for Clean Water, Pet Waste Stations, Clean Water Garden, Clean Water Biz, 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.
- Our MS4 Plan goals and timelines have been met, including completion of annual compliance reviews and an assessment of one educational activity each year. In FY25, the Canines for Clean Water photo contest was assessed.

▪ **Public Involvement and Participation**

P11 – Public Involvement and Participation/Access

- 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, a public process through Council and Springfield Planning Commission, and a website for both information and feedback. Codes, plans, and planning documents are posted on the website and available for comment when relevant.

PI2 – Public Involvement and Participation Stewardship/Reporting

- 4 stewardship events in FY25
- Our MS4 Plan goals and timelines have been met, including annual compliance reviews, updates to our public website, and public notices.

▪ **Illicit Discharge Detection and Elimination**

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

- Springfield has had an active IDDE program since coverage under the Individual Permit. We have dedicated IDDE staff, municipal code prohibiting illicit discharges (updated by ordinance in FY23), a reporting and response process, a detection process, incident tracking and mapping, and an enforcement matrix (last updated in FY24). Our program is documented and has guidance manuals and SOPPs (updated in 2022) 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.
- Our MS4 Plan goals and timelines have been met, including annual compliance reviews and tracking of the IDDE program.

ID2 – MS4 Map

- Annual updates of new stormwater infrastructure have been added to the MS4 map. The map is continually updated as the City grows.

ID3 – Dry Weather Screening Program

- Developed a dry-weather screening program in FY22.
- Screened 48 MS4 outfalls in FY25 (160 outfalls screened over the permit term out of 223 total = 71.7%).
- Implemented Springfield’s Staff Training and Education Strategy, which includes illicit discharge training (FY23).

ID4 – Non-Stormwater Discharge Assessment

- Reviewed and updated both the Non-Stormwater Discharge Assessment Report and the Product Assessment in FY22. Implementation is ongoing.

▪ **Construction Sites Runoff Control**

CSW1 – Erosion and Sediment Control Regulations

- Springfield has had an active construction site runoff control program since coverage under the Individual Permit in 2007. In FY25, we continued implementation of LDAP Springfield Municipal Code, which was updated and adopted by ordinance in FY24 to meet the requirements of the 2021 MS4 Phase II General Permit.

- Ongoing 1200C referrals to DEQ. Referral process verified. 1200CA was updated in FY23 and is in place.

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

- Continued to implement the LDAP program, including dedicated ESC staff, a plan review process, site inspections, a reporting and response process, and an enforcement matrix. Our program is documented and has guidance manuals and SOPPs for implementation. Code updates were completed in FY24.

CSW3 – Inspections and Enforcement

- Continued to implement existing LDAP program, including inspections, enforcement, and tracking.
- Reviewed LDAP program inspection and documentation process in FY22.
- LDAP Enforcement Matrix reviewed and implemented.

CSW4 – City Staff Erosion Control Training

- Our staff responsible for program implementation have maintained their CESCLs; one inspector was recertified in FY25.
- Increased outreach to construction site operators, including through email lists, newsletters, TV slides at City Hall, etc. We updated our LDAP fact sheets in FY24; they are available on the website and in hard copy.
- Implemented Springfield’s Staff Training and Education Strategy, which includes construction site runoff control training (FY23).
- Our MS4 Plan goals and timelines have been met, including annual compliance reviews.

▪ **Post-Construction Site Runoff for New Development and Redevelopment**

DS1 – Post Construction Stormwater Management Code and Standards

- Springfield has had post-construction requirements since coverage under the Individual Permit. We have engineering, planning, and inspection staff, post-construction code, treatment standards, a design manual, a tracking system for development and inventory, site inspection and enforcement, and a plan review process.
 - Post-construction Springfield Development Code updates were adopted in FY24 to meet the requirements of the 2021 MS4 General Permit Modification.

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

- Continued implementation of the Water Quality Facility Management Program for both public and private facilities (in place since 2010) that provides inspection of stormwater controls, education on best practices, and enforcement of water quality facility maintenance. This program is documented and has guidance manuals for implementation. Educational material is available in hard copy and on our website.

DS3 – Post Construction Stormwater Management Training, Tracking, and Assessment

- Our MS4 Plan goals and timelines have been met, including compliance reviews, implementation of existing codes and standards, and continual program review and improvements.
 - Staff working in this control measure attended the Stormwater Summit (3 staff) and the Green Infrastructure Leadership Exchange annual conference (1 staff) in FY25.

▪ **Pollution Prevention and Good Housekeeping for Municipal Operations**

OM1 – Routine Maintenance Operations for Water Quality

- Routine sweeping, catch basin cleaning, litter control, and water quality facility and stormwater control maintenance are completed annually. The City continued implementation of the *Storm and Surface Water Maintenance Strategy* (completed in FY23).
 - 9,360 curb miles swept in FY25
 - 2,157 catch basins cleaned in FY25

OM2 – Pollution Control Manuals and Guidelines for City Operations

- Springfield continued to implement best management practices and good housekeeping measures for pollution prevention in FY25, including implementation of various guidance manuals.
 - In FY24, the *Pollution Control and Best Management Practices Manual for Routine Maintenance Activities*, the *Spill Prevention, Control, and Countermeasures Plan (SPCC) for the Regional Fuel Facility*, and the *Stormwater Pollution Control Plan (SWPCP) for the Operations Complex* were updated.
 - In FY23, the *Stormwater BMP Guidance Manual for the Fire Department* and the *Wash Rack Inspection and Guidance Manual* were updated.
 - Standard Operating Policies & Procedures (SOPPs) were updated in 2022.
 - An assessment was conducted to determine if there was a requirement to have coverage under the 1200z permit was completed in January 2021. No city facilities or activities qualified for a 1200z permit.

OM3 – Municipal Operations Training, Tracking, and Assessment

- Continued to implement the Springfield Staff Training and Education Strategy, which includes Operations staff (updated December 2022).
 - Several stormwater trainings were held for internal staff in FY25, including Green Stormwater Infrastructure Maintenance (4 Operations staff), IDDE Awareness (49 Operations staff), and Spill Kits (43 Operations staff).
 - Other training of Operations staff includes HAZWOPER, short schools, herbicide applicator-related trainings, and more. On the job training is also provided.

The goals and tasks for mercury reduction as outlined in the 2024 TMDL IP are on track.

Adaptive Management Measures

The TMDL Implementation Tracking Matrix, attached, 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.

Attachment 1: 2024 TMDL Implementation Tracking Matrix

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
Temperature	Solar radiation to surface waters	T1 – Potential Shade & Natural Resource Area Planning	Task 1 - Plan, design, and track riparian/channel enhancement capital projects.	Community Development Division (Capital Engineering, Comprehensive Planning)	Track data for completed waterway enhancement CIP projects.	Ongoing	Length of riparian area restored	None in FY25
				Environmental Services Division (Water Resources)	Explore options to dedicate staff time to waterway enhancement and project delivery within the CIP program.	March 2029	Number of trees and shrubs planted	1 meeting
				Environmental Services Division (Water Resources)	Continue Lower Mill Race stormwater and restoration project planning, with a Planning Study drafted.	April 2027 March 2029	Lower Mill Race Planning Study drafted	Not started
				Environmental Services Division (Water Resources)	Work with private landowners to acquire property or easements along the Lower Mill Race, where feasible.	March 2029	Property or easement acquired where feasible	Not started
			Community Development Division (Comprehensive Planning)	Task 2 - Modernize and maintain Goal 5 natural resource area mapping.	Update Goal 5 natural resource inventory mapping.	March 2027	Goal 5 natural resources layers updated	In progress
			Operations Division (GIS) Environmental Services Division (Water Resources)					
		T2 – Riparian Area, Parking Lot & Streetscape Shade Protection & Enhancement	Task 1 - Take protections for Goal 5 natural resources inventoried in Springfield's UGB expansion areas to City Council for adoption. Clarify Springfield Development Code Goal 5 protections and update adopted land use plans for new protections, as needed.	Community Development Division (Comprehensive Planning)	Take protections for significant Goal 5 natural resources areas inventoried in the UGB expansion areas to City Council for public hearing.	January 2028	Goal 5 protections taken to Council for public hearing	DSL approved UGB LWI 5/22/25
				Environmental Services Division (Water Resources)	Clarify Development Code Goal 5 protections and take to City Council for public hearing.	January 2028	Development code clarifications taken to Council for public hearing	Not started
			Task 2 - Inventory and maintain public trees, review tree-related requirements in the Springfield Development Code, and explore application for Tree City USA recognition.	Operations Division (Streets, ROW, Open Spaces, GIS)	Work to complete an inventory of public trees.	January 2026	Number of trees inventoried	127
				Operations Division (Streets, ROW, Open Spaces, GIS)	Continue to maintain public trees. Document maintenance activities and number of street trees planted by Operations annually.	Annual	Number of street trees planted by Operations	107
				Community Development Division (Development Review, Comprehensive Planning)	Continue to budget for tree-related expenditures.	Ongoing	Tree expenses in annual budget	Yes in FY25
				Community Development Division (Development Review, Comprehensive Planning)	Review existing ordinances for public and private trees and identify revisions. If code amendments are needed, take to City Council for public hearing.	January 2026 January 2029	Existing ordinances reviewed Code amendments taken to Council, if needed	In progress
				Environmental Services Division (Water Resources)	Explore creating a tree committee or department.	January 2029	Tree committee or department discussed	1 meeting
				Environmental Services Division (Water Resources)	Explore application for Tree City USA.	January 2029	Tree City USA application discussed	1 meeting

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Temperature	Solar radiation to surface waters	T2 – Riparian Area, Parking Lot & Streetscape Shade Protection & Enhancement	Task 3 - Waterway maintenance and restoration.	Operations Division (Open Space/GIS) Environmental Services Division (Water Resources)	Improve mechanisms for tracking the area of invasive plants removed and native trees and shrubs planted.	March 2026	Tracking mechanisms implemented	1 meeting
					Continue to maintain City-owned waterways (including the Mill Race) by removing invasive plants, maintaining flows, and planting native trees and shrubs.	Ongoing	Invasive plants removed Native trees and shrubs planted	Mill Race, Jasper Slough 1,460 trees and shrubs planted
					Draft a waterway maintenance plan.	January 2029	Waterway maintenance plan drafted	Not started
					Explore funding options for adding staff dedicated to waterway maintenance.	March 2029	Funding options explored	1 meeting
					Implement one public stewardship opportunity.	March 2029	Stewardship opportunity implemented	100%
	Warm water discharges	T3 – Industrial Warm Water Discharges	Task 1 - Map NPDES industrial stormwater permit holder sites within Springfield's City Limits. Review and provide comments to DEQ on industrial stormwater permits in Springfield when they are available for public review.	Environmental Services Division (Water Resources)	Review and update the map of current industrial stormwater dischargers within Springfield's City Limits.	July 2025, and again by July 2027	Map updated	60% complete
					Provide comments to DEQ during public review of industrial permits when they are issued or renewed.	Ongoing	Number of industrial stormwater permits reviewed	0 in FY25
	Warm water discharges Solar radiation to surface waters	T4 – Public Outreach and Education	Task 1 - Continue to develop and distribute outreach and education materials to businesses and the general public as needed.	Environmental Services Division (Water Resources, Communications/Public Affairs)	Maintain website with annual updates of TMDL information and public outreach materials that focus on ways to reduce temperature (such as planting native plants and trees) and preventing warm water from entering the stormwater system.	Annual	Website updated	100% in FY25
					Continue to develop and distribute outreach materials to businesses and to the general public.	Ongoing	Number of outreach materials distributed	751 in FY25
	Bacteria	Sanitary sewer system	B1 – Sanitary Sewer Overflows – City Work Practices	Task 1 - Continue to implement current City standard operating procedures for sanitary spill response. Amend or revise if appropriate to ensure rapid and effective response.	Environmental Services Division (Water Resources) Operations Division	Implement SOPPs for sanitary spill response and update as needed.	Ongoing	SOPPs implemented SOPPs updated if needed
Animal/Pet waste		B2 – Animal/Pet Waste - Program Enhancement	Task 1 - Coordinate with local partners to identify locations for additional pet waste disposal stations in public areas and assist with maintenance. Maintain City-managed pet waste stations.	Environmental Services Division (Water Resources)	Continue to collaborate with local partners to identify additional prospective pet waste station sites.	March 2025, and again by March 2027	Local partners contacted	100% in FY25
					Continue to assist local partners with the maintenance of new and existing stations/sites.	August 2025, and again by August 2027	Number of stations Number of bags	0 stations 6,000 bags in FY25

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Bacteria	Animal/Pet waste	B2 – Animal/Pet Waste - Program Enhancement	Task 1 - Coordinate with local partners to identify locations for additional pet waste disposal stations in public areas and assist with maintenance. Maintain City-managed pet waste stations.	Environmental Services Division (Water Resources)	Maintain City-managed pet waste stations.	Ongoing	Number of bags	123 inspections 8,000 bags
					Continue to maintain an inventory of station locations.	Ongoing	Number of new stations Map updated and maintained	1 station replaced Yes
			Task 2 - Continue to identify pet care providers and services in Springfield and provide outreach.	Environmental Services Division (Water Resources)	Continue to identify new pet supply, service, and care facilities within the UGB. Review and update the list of pet supply, service, and care facilities.	Annual	List reviewed and updated	100% in FY25
					Continue to coordinate with pet businesses on educational material distribution and track the location and materials distributed.	Ongoing	Number of outreach materials	252 brochures 3500 calendars
					Continue to offer and provide technical assistance about pet waste management to pet businesses. Reach out to owners/operators at least twice during the Plan cycle and track participation.	April 2025, and again by April 2027	Number of pet businesses contacted Number of participating businesses	54 businesses 0 businesses
			Task 3 - Continue pet waste outreach and education at public events and distribute outreach materials.	Environmental Services Division (Water Resources, Communications/Public Affairs)	Update outreach materials as needed and maintain website.	Annual	Website updated	100% in FY25
					Hold one <i>Canines for Clean Water</i> pledge event each fiscal year.	Annual	One pledge event per fiscal year	100% in FY25
			Task 4 - Discourage wildlife feeding through outreach and education.	Environmental Services Division (Water Resources)	Continue to coordinate with partners such as Willamalane Park & Recreation District and City Operations staff to identify locations where wildlife feeding is concentrated and, where appropriate, post signage. Reach out to partners and staff.	March 2025, and again by March 2027	Local partners/staff contacted Number of new signs installed	100% 0 signs in FY25
					Continue to track educational material distribution and update sign inventory on an ongoing basis.	Ongoing	Number educational materials Sign inventory updated	0 materials No updates

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Bacteria	Sanitary wastes	B3 – Septic System Inventory & Outreach, Private Sanitary Outreach, & Transient Camping	Task 1 - Maintain a septic system inventory within the City Limits. Review, update, and deliver outreach and educational materials to septic owners. Continue to extend municipal sanitary sewer services as appropriate.	Environmental Services Division (Water Resources) Operations Division (GIS) Community Development Division (Capital Engineering)	Continue to maintain a septic system inventory within the City Limits.	Annual	Number of hook ups to sanitary sewer from septic Septic system map updated	6 hook ups 100% in FY25
					Review, update as needed, and deliver outreach and education materials to private septic system owners twice during the five-year cycle.	April 2025, and again by April 2028	Number outreach materials delivered	Updates complete 3,562 brochures 2,950 owner and 1178 renter postcards
					Continue to extend public sanitary services where feasible.	Ongoing	Linear feet sanitary sewer extension	14,965 linear feet
			Task 2 - Continue to provide outreach and technical assistance to businesses to improve sanitary waste disposal practices.	Environmental Services Division (Water Resources)	Continue to identify private waste-generating businesses and activities. Develop and distribute outreach materials (as needed) which include best management practices, relevant regulatory requirements, and lists of resources for additional information.	April 2025, and again by April 2028	Audiences identified Educational material developed and delivered	100% in FY25
			Task 3 - Continue to remove litter and clean up transient camps along City-managed waterways.	Operations Division (Open Space, GIS)	Clean up litter and transient camps along waterways managed by the City and track the number of illegal campsites cleaned up and the pounds of material removed.	Annual	Number of campsites cleaned up Pounds material removed	6 camps 13,000 lbs
Mercury	Construction site soil erosion	M1 – Limit Construction Site Erosion	Task 1 - Continue to implement and adaptively manage the existing Land and Drainage Alteration Permit (LDAP) construction site erosion control program.	Community Development Division (Construction Services) Environmental Services Division (Communications/Public Affairs)	Track the number of LDAP permits issued, inspections conducted, and enforcement actions within the City Limits and the Urban Transition Zone.	Annual	Number of permits issued Number of inspections Number of violations Number of enforcement actions	208 1007 0 0
					Distribute LDAP fact sheets and conduct outreach to construction site operators.	Annual Outreach by April 2026	LDAP fact sheets stocked/posted Construction site operators contacted	100% in FY25 Not started
					Update LDAP program manual to reflect current municipal codes, processes, and documents.	April 2026	LDAP manual updated	20% complete
					Conduct a review of the LDAP program to determine if revisions, enhancements, or modifications are needed.	Review by April 2026 If needed, take revisions to Council by July 2028	LDAP program reviewed Revisions taken to Council (if needed)	Not started
					Refer construction activity within Springfield's jurisdiction that requires 1200C permits to the Oregon DEQ.	Ongoing	Number of projects referred to DEQ	7

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Mercury	Urban runoff	M2 – Enhance Post Construction Support	Task 1 - Continue Water Resources staff participation in the City’s development plan review process.	Environmental Services Division (Water Resources) Community Development Division (Land Development Engineering, Development Review)	Water Resources staff will continue to review and provide comments for development plans that include water quality or LID features. Track the number of development applications reviewed.	Ongoing	Number of applications reviewed	36 in FY25
			Task 2 - Continue to implement a post-construction mapping and inspection program to ensure maintenance of water quality facilities at private development sites.	Community Development Division (Land Development Engineering, Development Review) Environmental Services Division (Water Resources)	Ensure long-term functionality of private stormwater facilities through the continued use of maintenance agreements.	Ongoing	Use of maintenance agreements	100% in FY25
					Map private water quality facilities and document the number of facilities mapped.	Ongoing	Number of facilities mapped	199 in FY25
					Inspect private water quality facilities and document number of inspections.	Ongoing	Number of inspections	186 in FY25
					Continue program implementation within resource limitations. Review the Water Quality Facility Management program, adaptively manage.	April of 2026	Program reviewed	10% complete
			Task 3 - Continue to implement a post-construction mapping, inspection, and maintenance program to ensure long-term functionality of public water quality facilities.	Operations Division (Street/ROW, GIS) Environmental Services Division (Water Resources)	Map public water quality facilities and document the number of facilities mapped.	Ongoing	Number of facilities mapped	1 in FY25
					Inspect and maintain City-managed water quality facilities and document inspections and maintenance.	Ongoing	Number of inspections	166 in FY25
					Update public facility operation and maintenance plans.	June 2028	Operation and maintenance plans updated	Not started
					Create operation and maintenance plans for new facilities.	Ongoing	Operation and maintenance plans created	3 in FY25
			Urban street runoff	M3 – Street Sweeping, Catch Basin & Pipe Cleaning Programs	Task 1 - Continue implementation of the current programs for street sweeping and catch basin and storm drainage pipe cleaning. Adaptively manage program practices and standards to enhance maintenance, as needed.	Operations Division (Wastewater & Subsurface Stormwater, Streets/ROW, GIS)	Continue implementation of routine street sweeping and storm system cleaning programs to reduce pollutants in the public ROW and drainage systems. Track curb miles swept and linear feet of pipes cleaned.	Annual
	Strive to inspect/clean at least 10% of City owned catch basins/inlets per year.	Annual					Number of catch basins cleaned	2,157 cleaned (33.4%)
	Hazardous waste control	M4 – Hazardous Waste Control	Task 1 - Promote public household waste collection events to encourage proper disposal of items containing mercury.	Environmental Services Division (Water Resources, Communications/Public Affairs)	Springfield will continue to participate in and support public events involving proper household hazardous waste disposal and recycling such as Spring Clean Up and home and garden shows.	Ongoing	Number of events held or promoted	2 events in FY25

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Mercury	Hazardous waste control	M5 – Public Outreach & Education	Task 1 - Continue to develop and distribute outreach and education materials to the general public, as needed.	Environmental Services Division (Water Resources, Communications/Public Affairs)	Update outreach materials as needed and distribute to the general public. Track material distribution.	Ongoing	Number of outreach materials distributed	1 e-newsletter	
Mercury and Other Pollutants	Stormwater Runoff – MS4 General Permit Control Measures*	#1 Public Education and Outreach	Task 1 - PE1 - Public Education and Outreach Strategy (PEOS)	Environmental Services Division (Water Resources, Communications/Public Affairs)	Implement Public Education and Outreach Strategy.	Ongoing	Strategy implemented	Complete	
					Continue to update Council and Commission as needed.	Annual	Number of Council updates	9 updates	
					Review and update, as needed, the IGA with Lane County for NPDES Services.	2024	IGA updated and implemented	Complete	
			Task 2 - PE2 - Public Education and Outreach on Pollution Prevention and Stormwater Impacts	Environmental Services Division (Water Resources, Communications/Public Affairs)	Targeted public education and outreach implementation; distribute educational message to targeted audiences.	Ongoing	Number of educational messages distributed	29 outreach activities	
					Assess progress toward program implementation via program review.	Annual	Program reviewed	Complete	
					Assessment of one outreach activity.	Annual	Assessment completed	Complete	
		#2 Public Involvement and Participation	Task 1 - PI1 - Public Involvement and Participation/Access	Environmental Services Division (Water Resources, Communications/Public Affairs)	Continue to implement a public participation process.	Ongoing	Opportunities for public input provided	Complete	
					Review the MS4 General Permit website posting requirements and update as needed.	Ongoing	Website reviewed and updated	Complete	
			Task 2 - PI2 - Public Involvement and Participation Stewardship/Reporting	Environmental Services Division (Water Resources)	Continue to plan and provide stewardship opportunities.	Ongoing	Stewardship opportunity implemented	Complete (4 events in FY25)	
					Assess progress toward program implementation.	Annual	Program reviewed	Complete	
		#3 Illicit Discharge Detection and Elimination	Task 1 - ID1 - Illicit Discharge Ordinance, Response, Enforcement, and Tracking	Environmental Services Division (Water Resources)	Operations Division	Continue to respond, enforce, and track illicit discharges and complaints.	Ongoing	Number of IDDE incidents Number of enforcement actions	64 0
						Environmental Services Division (Water Resources)	Assess progress toward program implementation.	Annual	Program reviewed
				City of Springfield	Continue to implement and enforce SMC 4.370-4.372 to prohibit illicit discharges to the MS4.	Ongoing	Continued implementation of IDDE ordinance	Complete	
				Environmental Services Division (Water Resources)	Continue to implement IDDE enforcement procedures and matrix. Review and update as needed.	Ongoing	Continued implementation of IDDE enforcement procedures and matrix	1 update	

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Mercury and Other Pollutants	Stormwater Runoff – MS4 General Permit Control Measures*	#3 Illicit Discharge Detection and Elimination	Task 2 - ID2 - MS4 Map	Operations Division (GIS)	Continue ongoing GIS mapping and inventory of Springfield's MS4 storm system infrastructure.	Ongoing	City storm infrastructure mapped	Complete
				Environmental Services Division (Water Resources)	Review mapping and inventory requirements as listed in the MS4 Modified General Permit and identify mapping gaps.	Ongoing	Updates to mapping gaps completed	Complete
			Task 3 - ID3 - Dry Weather Screening Program	Environmental Services Division (Water Resources)	Continue to implement a dry-weather screening program.	Annual	Number of outfalls screened	48 outfalls
					Train staff involved in IDDE program implementation and dry weather screening.	Once during MS4 permit term	Number of staff trained	Complete
		Task 4 - ID4 - Non-Stormwater Discharge Assessment	Environmental Services Division (Water Resources)	Continue to implement the Non-Stormwater Discharge Assessment Evaluation and the Product Assessment. Review and update as needed.	Ongoing.	Continued implementation of BMPs Reports reviewed and updated as needed	Complete	
		#4 Construction Site Runoff Control	Task 1 - CSW1 - Erosion and Sediment Control Regulations	City of Springfield	Continue to implement existing Springfield municipal and development code provisions for construction activities.	Ongoing	Continued implementation of municipal and development codes for construction activities	Complete
				Community Development Division (Construction Services)	Update, as needed, existing codes and standards to ensure compliance with the MS4 permit.	Ongoing	Code/standards updated, if needed	Complete
					Continue DEQ referrals as appropriate.	Ongoing	Number of DEQ referrals	7 in FY25
			Task 2 - CSW2 - Land Drainage Alteration Permit (LDAP) Program	Community Development Division	Ongoing implementation of LDAP program runoff controls and site plan review.	Ongoing	Continued implementation of LDAP Program runoff controls and site plan review	Complete
			Task 3 - CSW3 - Inspection and Enforcement	Community Development Division (Construction Services)	Continue to track, enforce, and inspect construction sites and investigate and enforce construction-related nuisance violations.	Ongoing	Number of inspections Number of enforcement actions	1007 0
					Review the LDAP enforcement matrix and update as needed.	Ongoing	Enforcement matrix reviewed and updated, if needed	Complete
			Task 4 - CSW4 - City Staff Erosion Control Training	Community Development Division (Construction Services)	Continue to maintain a comprehensive and professional level of erosion control training for LDAP staff.	Once during MS4 permit term	Number of trainings and staff	1 staff recertified
		Environmental Services Division (Water Resources)		Increase outreach and education to construction site operators.	Ongoing	Construction site operators contacted	Complete	
				Assess progress toward program implementation.	Annual	Program reviewed	Complete	

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Mercury and Other Pollutants	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 current post-construction requirements and site plan review for development and redevelopment.	Ongoing.	Continued implementation of post-construction requirements and site plan review	36 applications reviewed	
					Update, as needed, existing codes and standards to ensure compliance with the MS4 permit.	Ongoing	Code/standards updated, if needed	Complete	
			Task 2 - DS2 - Post Construction Stormwater Facility Long-Term Operation and Maintenance	Environmental Services Division (Water Resources)	Continue implementation of the Water Quality Facility Management Program which includes inventory, inspections, and compliance actions to the MEP.	Ongoing	Continued WQF Management Program implementation	201 facilities mapped 352 inspections	
			Task 3 - DS3 - Post Construction Stormwater Management Training, Tracking, and Assessment	Community Development Division Environmental Services Division (Water Resources)	Provide training to staff involved in program implementation. Assess progress toward program implementation.	Once during MS4 permit term Annual	Number of trainings and staff Program reviewed	2 trainings 3 staff Complete	
			#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 to the MEP.	Ongoing	Curb miles swept	9,360 miles
						Continue to implement the Storm and Surface Water Maintenance Strategy. Update as needed.	Ongoing	Continued strategy implementation	Complete
		Inspect and clean City catch basins, Maintain inspection and cleaning records.				Annual	Number of catch basins inspected/cleaned	2,157 cleaned	
		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. Review and update as needed.	Ongoing	Continued implementation of the Pollution Control Manual and guidance documents	Complete	
		Task 3 - OM3 - Municipal Operations Training, Tracking, and Assessment		Operations Division Environmental Services Division (Water Resources)	Provide training to staff involved in program implementation.	Once during MS4 permit term	Number of trainings and staff	3 trainings 49 staff	
					Assess progress towards implementation of the program.	Annual	Program reviewed	Complete	

*Springfield's MS4 permit expired on February 28, 2024. It is expected that these control measures will continue into the fourth TMDL Implementation Plan cycle.