

City of Springfield

TMDL Implementation Plan Sixth Year Annual Report 14-15



Legacy Estates Swale 2013

July 1, 2014 thru June 30, 2015



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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 April 2014, approved by the Oregon Department of Environmental Quality (Oregon DEQ) May 2014, 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 Springfield 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. This Annual Report is Springfield's Sixth and covers the time frame from July 1, 2014 to June 30, 2015. The report is due to the Oregon DEQ by November 1st, 2015.

Springfield submitted its application for the City's MS4 permit renewal June 30, 2011. At that time, the DEQ was considering including TMDL pollutants and their waste load allocations (WLA) as part of the MS4 permits best management practices for pollution reduction by using qualitative or quantitative benchmarks. Springfield's TMDL IP was incorporated into the proposed Stormwater Management Plan (SWMP) that was submitted with the renewal application for its MS4 permit. TMDL goals and tasks were incorporated as part of the Minimum Control Measures and BMP's. Springfield is still under an administratively extended permit status and is not expected to receive its MS4 Permit renewal until 2016. Springfield will continue to submit copies of the Annual Reports covering the time frame from July 1st to June 30th 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. The Springfield public stormwater drainage system discharges to both of these rivers.

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

Regulatory Context

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

Reporting Requirements

This Annual Report is required to include the progress and/or status of Springfield’s 2014 TMDL Implementation Plan’s measureable 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 will provide information about each strategy, implementation methods for each 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, and changing priorities can impact the rate or success of implementation.

The City is continuing to implement existing programs and further projects and goals under the 2014 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 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 Table 2 TMDL Implementation Tracking Matrix for completion status.

Temperature:

- T1 - Inventory Existing and Potential Shade and Enhancement Areas

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.
- Continued work on potential sites for shade planting – discussion includes ongoing projects along the Q Street Floodway and new opportunities. An additional 300 trees were planted along the Q Street Floodway over the past year by students and 105 trees and shrubs were added to water quality facilities during work party cleanup projects.
- 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. An additional 46 large shrubs and small trees were added near the gauging station during this last reporting cycle.
- A stormwater treatment park along the north bank of the Mill Race is in the development stages. A feasibility study was completed and the project is at 90% design. This facility will also provide education and a trail system. Some project prep work has taken place such as property acquisition and utility work.
- The Lower Mill Race project continues to look into acquiring land for future enhancement projects.
- Efforts continued with the Metro Waterways Projects along Cedar Creek. Efforts include partnering with the McKenzie Watershed Council to provide shade plantings along the banks. SUB, EWEB, and local students monitor water quality. Additionally, the partnership is working with the City of Springfield to pass a priority budget to start implementation. Contractors performed some site preparation work and are working to get landowners more involved.
- The riparian shade projects along the Mill Race that were not part of the ACOE restoration project continue; watering and monitoring is ongoing.
- The Channel 6 Master Plan continues with work being done on an action plan. This project will incorporate a series of treatment swales, invasive plant removal, and native vegetation and trees planted.
- The 48th Street Channel restoration project continues with a wetland study and design work, site visits, and a tour of the headwaters.
- City Staff planted an additional 24 native trees on a City lot along the Mill Race at S. 39th Street. A multiuse path and trailhead entrance is expected to go through this area; trees were added to the perimeter of the site in preparation of future use.

- T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement

Summary:

- The major review of 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 continues to be reviewed and improved upon to optimize shading, address pervious pavements, and stormwater discharge alternatives. Some additional work was done on LDAP Code improvements; changes were made to the City's municipal code to improve Erosion and Sediment Control code.
- The City started a review of various codes to enact a specific set of codes for the downtown areas as development occurs; these codes will include water quality and tree standards.
- Another review of the Springfield's Engineering Design Standards and Procedures Manual for chapters pertaining to water quality facilities, water quantity, facility design, vegetation and tree standards, and riparian enhancement, is currently underway.
- Staff continues to work with developers, through the development review process, on providing large canopy trees, minimizing pervious surface and/or incorporating additional vegetation into planned project sites.
- The Mill Race Restoration Project is in the O&M stage with ongoing maintenance. A stormwater treatment park is in the development stages; the project is at 90% design. Some project prep work has taken place such as property acquisition and utility work. Additional trees were added to the S. 39th site and 46 large shrubs and small trees were added by the gauging station during this last reporting cycle.
- Additional work is being done to enhance the Over/Under Channel at the end of the system; banks will be laid back and native vegetation added. The area being considered is currently depleted of native vegetation and trees.
- Some of the Mill Race O&M requirements were met by students doing vegetation assessments and monitoring.

- T3 - Manage Industrial Warm Water Discharges

Summary:

- Staff continues to review numerous 1200z permits and Pollution Control Plans for industries in Springfield's jurisdiction and provides comments to DEQ. Staff has had multiple conversations with warm water dischargers in the area discussing options such as recirculation and cooling processes in an effort to reduce or eliminate these permitted discharges. Staff solicited 25 industries for their pollution control plans during this time frame.

- 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 and discharge standards.
- In FY13/14 Water Resource staff compiled a list of known boilers within the City limits with the intent to work on a process to ensure proper boiler blow down, permitting, and compliance. This project has since been incorporated into the Assessment of Industrial and Commercial Sites project. The 1700 washwater permitted sites and 1200-z permit holders are also being included for site investigations/assessment within this project.
- Under the first TMDL IP, educational outreach materials were developed and distributed to mobile pressure washing companies, pressure washing rental companies and home improvement centers that sell pressure washers. The material addresses warm water discharges and City regulations. This material went through an evaluation process at the end of June and will continue into the next cycle. The intention of the evaluation is to review the material to ensure they are up-to-date and provide the target audience with the best management practices for warm and/or polluted water.

- T4 – Public Outreach and Education

- Summary:

- Staff continues to revise and update existing education and outreach materials and participate in clean water classes in schools, Earth Day, Regional Pressure Washing Campaign, Fish Friendly Car Wash Kits, Public Works Week, Career Day, PeaceJam (formally Youth Day of Caring), Lane County Home Show, and garden shows.
 - A Clean Water Garden booklet series that focuses on water harvesting, stream side gardening and riparian planting continues to be popular for home owners and residents. Information on temperature as a pollutant and canopy tree planting is included in the material. A review of the material began in June and will continue into the next cycle; there will be updates to the material as appropriate.
 - Staff posted door hangers in 1 neighborhood that had high occurrences of yard waste dumping which kills vegetation, exposes banks, and increases stream temperature.
 - Material has been developed and continues to be distributed to mobile pressure washing companies, pressure washing rental companies and home improvement centers that sell pressure washers. The material addresses warm water discharges and City regulations. A review of the material began in June and will continue into the next cycle; there will be updates to the material as appropriate.
 - IDDE response, educational outreach, and enforcement continued in response to temperature related discharges and vegetation removal or dumping.

- School workshops continue to include temperature as a pollutant discussion and the importance of trees along banks of streams.
- The MR Treatment Park is currently under design and development at 90% design. This project will include an educational component, which will be a series of interpretive signs along a path, treatment swale, and wetland area. Information on temperature and riparian vegetation will be included.
- The educational portfolios were updated and restocked. These portfolios contain education and outreach material easily stored in key City vehicles.

The goals and tasks for temperature reduction as outlined in the 2014 TMDL IP are all on track.

Bacteria:

- B1 - Sanitary Sewer Overflows (SSO) - Work Practices

Summary:

- SOPP's related to SSO procedures and protocols have been reviewed, updated and adopted for City staff and are included in contractor provisions. The City continues to evaluate and adaptively manage its procedures and policies as needed, coordinating efforts with the Development and Public Works Operations Division, Police, Fire and Environmental Services staff. No updates to standards were made during this time.
- 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. No updates to standards were made during this time.
- Contractors working on new or existing sanitary systems under City supervision are continued to be provided with information for proper reporting.
- IDDE and Operations staff continue to respond to and address bacteria related discharges.
- Staff responded to 3 Sanitary Sewer Overflow's (SSO's) during this reporting period.
- The So. 2nd Street Sanitary Sewer Replacement project replaced 1,400 feet of sanitary line, manholes, and storm catch basins. This project was done in response to a SSO caused by failing concrete pipe.
- Tasks listed for the review of current standards, work provisions, relevant SOPPs will be implemented beginning in 2016.

- B2 - Animal/Pet Waste - Program Enhancement

Summary:

- During this reporting period, meetings with Willamalane Parks and Recreation District, Springfield School District19, and City Operations Division staff

identified additional locations for pet waste stations. Pet waste stations continue to be installed as locations are identified. Two additional stations were installed this reporting year. Staff and partners continue to monitor stations, replace bags and evaluate new locations. 10,200 bags were distributed.

- 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. Tasks listed for updating the list of pet service providers will be implemented beginning 2017.
- 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. 55 pet waste management brochures were distributed during this reporting period.
- 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's Pet Fest, Spring Clean-up, Canines Competition, Earth Day Poster Contest, National Night Out, Canines for Clean Water Pledge Events, and Regional Pressure Washing Campaign.
- The "Canines for Clean Water" program continues to be a success. This spring, Springfield held its first calendar contest where the public could submit photos of their dogs to be in 2016 calendar. 380 Springfield residents submitted photos for the contest and pledged to pick up after their pet. The contest was promoted through social media and via flyers at local pet-related businesses (735 flyers were distributed at pet groomers, veterinarians, etc). The contest drew 1,041 Facebook likes and comments, 380 submissions, and one local TV station did 2 interviews and promoted the links on their webpage. Four public booth events were held during the reporting period resulting in 324 pledges, 324 bag holders, 324 bandanas, and 102 yard signs going out to the public. The Canines for Clean Water calendar continues to be a big hit as well; 3,285 calendars were distributed at local pet stores and other locations.
- 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; 2 signs were installed in a local park during this reporting period.
- Tasks listed for identifying additional distribution sites for outreach material will begin implementation in 2016, the review and updates will occur in 2017, and the Canines for Clear Water pledge events continues as an ongoing program.

- B3 - Septic Tank, Transient Camping & Private Sanitary Infrastructure Outreach & Edu Summary:
 - The septic tank inventory is complete; sites continue to be added to the inventory when discovered, removed or when connected to the City sewer system.
 - During this reporting period, two septic systems were decommissioned and the sites connected to the City sewer system.
 - In previous years, ESD staff created an educational brochure, “A homeowner’s guide to septic system maintenance,” with SUB and Rainbow Water District. This brochure was mailed out to all property owners and residents in the Urban Transition Zone. This reporting period there were 177 brochures mailed to septic system owners within the City Limits, 10 distributed at the Lane County Home Show, and 150 given to the Lane County Sanitarian for distribution from their office when permits are issued.
 - Two sanitary sewer extension projects began during this reporting cycle; the McVay Hwy and Franklin Blvd. Redevelopment. Both of these projects will set public sanitary systems in areas that are currently served via septic systems. All known failing septic systems will be required to connect to the City upon discovery. The McVay project is nearing completion and the Franklin Project is at 30% design.
 - Staff continues to maintain septic system educational material and the distribution of the material; material review and updates are scheduled to occur in 2016.
 - The assessment of commercial bacteria waste was completed. New potential bacteria sources have been identified with additional tasks to be implemented for educational outreach and site assessments to be implemented in 2017.
 - 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 1 assessment was completed, 32 camps cleaned up, and 3 large inter-agency cleanups took place. Additionally, the River Guardians drafted a proposal seeking funding for ongoing contractual services to clean river banks of transient activity and camps (this proposal did not get Council support for funding). City staff participated in the annual Willamette River Clean Up. Other tasks related to the review and update of codes and procedures will be implemented in 2017.

- B4 – Public Outreach and Education

Summary:

- Staff continues to revise and update existing education and outreach materials pertaining to bacteria; an evaluation of the educational material began in June and continues into the next reporting cycle and staff continues to participate in activities including; Clean Water Classes in elementary and middle schools, , participation in Earth Day, update of materials for the Regional Pressure Washing Campaign, update of the pet waste brochure for pet stores, participation in Environmental Education field sessions, and participation in Public Works Week.
- 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.
- Pet supply stores have been identified as outreach distribution sites and will continue to be stocked with materials and event information. A review and update of the list, needs and options will be implemented in the next reporting cycle.
- Clean Water University provided classroom and hands on education on water quality. Twelve classes with 330 students (each class completes 10 one-hour workshops) were held this fiscal year.

The goals and tasks for bacteria reduction as outlined in the 2014 TMDL IP are all on track.

Mercury:

- M1 - Limit Construction Site Erosion

Summary:

- The Land Drainage and Alteration Program (LDAP) staff continues to monitor and work on streamlining the permit process. New municipal code addressing LDAP code and erosion concerns was developed, adopted by Council, and implemented this cycle.
- Springfield continues to implement permit and program compliance for the DEQ for 1200-CN NPDES permitted activities within the City Limits. City Council approved and signed the IGA November 2010 and the DEQ signed in January 2011. The current agreement is expected to expire in November of 2015. Staff is currently participating in a state wide process to review the 1200C and CN permits, and renew agency agreements. Reporting data pertaining to 1200-CN permits is included in Springfield’s MS4 Annual Report, dated October 2015.
- The LDAP staff conducted a review of the LDAP program; their “LDAP Program Guide Book” and erosion and sediment control educational materials were updated.
- The City continues to maintain CESCL certification for two LDAP staff.

- The LDAP program inspections and compliance continues to provide ESC enforcement and compliance.
- M2 - Enhance Post Construction Support
 - 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 has been implemented to ensure the long-term viability of code-mandated water quality facilities in new developments. Inventory collection and mapping is ongoing and inspections continue. Post-construction inspections started in July 2010, they occur every year during the summer months starting in July. Inventory mapping occurs just prior to inspections and will be ongoing as new facilities are constructed or identified. Reporting data pertaining to the WQF Management Program is included in Springfield's MS4 Annual Report, dated October 2015.
 - Springfield's reduced SDC Program for installing rain gardens or rain water harvesting systems in residential builds continues to be offered as an incentive to builders and homeowners. These sites are tracked in the City construction/permit database.
 - Water Resource staff are currently doing another round of reviews to the EDSPM Chapters 3, 4, and 6. These chapters set design standards for water quality, stormwater management, and vegetation.
 - Water Resource staff currently participates in two major infrastructure and Code projects; The Franklin Blvd Redevelopment and the Downtown District Design Project. Both projects have either implemented or will implement design standards specific to their areas that pertain to water quality and LID approaches.
 - Eugene and Springfield staff had a second joint meeting to discuss Eugene's Stormwater Manual and Springfield's Design Standards. Staff reviewed and compared the two City's post construction programs.
- M3 - Evaluate/Enhance Street Sweeping, Catchbasin, and Pipe Cleaning Programs
 - Summary:
 - The review and adaptive management of the street sweeping, catchbasin & pipe maintenance programs, and equipment evaluation and scheduling is an ongoing task. The Operations Division continues to implement the programs as staffing and resources allow.
 - Currently, the City has two mechanical sweepers that are concentrated in the residential areas, which are swept about 4-7 times a year. One regenerative air sweeper is assigned to arterial and collector sweeping. Depending upon traffic

patterns, some streets are swept weekly and some every two weeks. Over 4,488 curb miles of routine sweeping took place with an additional 117 hours of sweeping provided for spill response, unscheduled call outs, and accident cleanup; 671 tons of material was removed.

- Catchbasin cleaning is seasonal with a goal of cleaning 80% of the catchbasins yearly. Over 3,683 catchbasins were cleaned removing 218.94 tons of material.
- Over 1,885 feet of storm line was cleaned, Ditch/Canal cleaning was done on 6.87 miles of system, and ditch reshaping was done on over 5,325 ft. of system.
- Additional program review and evaluations will be implemented in 2016.

- M4 - Hazardous Waste Control

Summary:

- Staff researched sources of mercury and mercury pollution and what household products, electronics, and appliances may contain mercury. Staff determined an educational brochure should be developed. Staff developed the brochure during this reporting period with 400 brochures received from the printer in the next reporting cycle.
- Development and Public Works continues to hold the annual Springfield “Spring Cleanup” event that collects electronics and other waste for recycling and proper disposal. The City continues to be an active member of regional groups that address household hazardous waste.
- Environmental Services staff continues to participate in the Regional “Eco Biz” Program that addresses and promotes mercury “switch out” for automotive electrical switches and promotes recycling with local auto shops. The City’s Fleet Maintenance Facility continues to maintain its Eco-Biz Certification. 52 letters were sent out to shops, 2 were re-certified, and 8 sites were visited.
- Auto shops were visited and technical assistance provided, as part of the City’s Auto Shop Program. Not all Auto Shops can achieve State Eco-Biz status, but may qualify as a “Clean Water Business” through the City program. This program promotes “switch out” for automotive electrical switches, recycling, and proper storage of material. 2 shops were visited and provided technical assistance during this reporting period.
- In previous year’s Springfield’s Industrial Pretreatment program provided administration of a dental Pollution Management Program (PMP) in cooperation with the Oregon Dental Association. Site inspections and technical assistance was provided to dental facilities. Upon statewide adoption of the requirement to install mercury amalgam separators at dental facilities, the dental PMP program was discontinued by Springfield staff in favor of the new statewide requirements. Enforcement and administration of program now rests with the Oregon Dental Board as required under the new rule. Springfield no longer tracks this program.

- A drug take back box for unwanted pharmaceuticals was installed at the City Police Department in previous years. Although the drug take back box does not directly affect the collection of mercury it has been very effective in collecting and removing pharmaceuticals from the waste stream and heightening people's awareness. Some pharmaceuticals can or do contain mercury, but the city does not track that information. One regional drug take back round up event was held.
- M5 – Public Outreach and Education
 - Summary:
 - Continued to revise and update existing education and outreach materials. The LDAP Program updated all of their erosion and sediment control factsheets and posted to the City webpage. All the education materials were reviewed and updated as needed during this reporting cycle, this included Clean Water At A Glance factsheets, and Clean Water Gardens booklets.
 - As mentioned above, a mercury educational brochure was developed; printing and distribution falls into the next reporting cycle.
 - The 48th Street Wetland restoration project continues with local partners. This project will remove sediment and invasive plants and reconstruct a wetland.

The goals and tasks for mercury reduction as outlined in the 2014 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.

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 2 - 2014 TMDL Implementation Tracking Matrix

POLLUTANT	SOURCE of POLLUTANT	STRATEGY What we are doing & will do to reduce pollution from this source	ACTIONS Specific ways to implement strategies	BENCHMARK Intermediate indicators to know progress is being made	TIMELINE	MEASURE How we will track implementation & completion	STATUS
Temperature	Solar radiation to surface waters	T1 - Inventory Existing and Potential Shade and Enhancement Areas	Maintain a priority project list for shading.	Review and update the existing inventory identifying potential sites.	By April 2017	Revise priority list of potential sites.	10% completed • List maintained (CIP)
			Work to develop public/private partnerships for demonstration projects.	Continue to explore available options for partnering on shading projects.	Ongoing throughout the cycle	Meet with selected groups and propose partnerships to implement shading projects.	Ongoing • QFW, Cedar Creek & 72 nd St. Channel, MR, Treatment Park, C6, 48 th St Channel, S. 39 th and S. 28 th at MR.
		T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement	Additional code review, evaluation and enhancement for parking lot, streetscape shade and riparian vegetation management, setbacks and buffers, and retrofit practices if appropriate.	Review the Development Code with key planning staff and determine if shading or riparian protection amendments are appropriate.	By April 2016	Review of Development Code for enhancement of riparian protection and impervious surface shading.	50% • LDAP – Chapt. 8 • EDSPM updates (3, 4, 6) • Downtown Design Codes
				If amendments are appropriate, develop & propose to Council or work to include them in an amendment package.	By April 2018	Proposals brought to Council.	100% completed • LDAP adopted by Council
			Mill Race restoration, maintenance, and enhancements	Continue to explore additional or alternative funding options & sources.	By April 2019	Review and update projects, funding options and source list.	50% completed • MR O&M • MR Treatment Park
				Work in identifying discrete projects that can advance overall restoration.	By April 2018	Review and update project list.	25% completed • S 39 th and MR
	Warm water discharges	T3 – Manage Industrial Warm Water Discharges	Work with industrial sources and Oregon DEQ to address warm water discharges through the Industrial Stormwater NPDES permit program.	Staff will continue to work with industrial dischargers and State regulators to find acceptable management resolutions.	Ongoing throughout the cycle	Industrial Stormwater permits reviewed, comments provided, and technical assistance provided as needed.	Ongoing • 1200z PCP 25 industries

POLLUTANT	SOURCE of POLLUTANT	STRATEGY What we are doing & will do to reduce pollution from this source	ACTIONS Specific ways to implement strategies	BENCHMARK Intermediate indicators to know progress is being made	TIMELINE	MEASURE How we will track implementation & completion	STATUS
	Public Interaction	T4 – Public Outreach and Education	Continue to develop and distribute outreach and education materials to the public.	Staff will continue to evaluate program needs and activities that effect water temperature. Staff will develop and distribute educational materials based on these evaluations.	Annually Starting January 2015	Continue to work with other agencies and independently to address activities that affect water temperature. Continue to develop and distribute educational material.	Ongoing <ul style="list-style-type: none"> • Updates to PE material, Classes and events, IDDE response, Treatment Park Edu component
Bacteria	Sanitary sewer system	B1 - Sanitary Sewer Overflows - Work Practices	Review current standard operating procedures for spill response. Amend or revise if appropriate.	Review relevant SOPPs for spills and overflows.	By April 2016 – 1 st review By April 2018 – 2 nd review	Review(s) completed	No activity this report period
				Develop/amended SOPPs, if needed.	By April 2017 and By April 2019	Approve and implement new or amended SOPPs if appropriate	No activity this report period
			Review contractor work provisions to ensure contractors understand Spfld. requirements for dealing with sanitary spills.	Conduct review of relevant Springfield standard contracting specifications.	By April 2016	Review of contract specifications	No activity this report period
				Develop revisions, if needed	By April 2017	Adoption of new or amended contractor work provisions.	No activity this report period
	Animal/Pet waste	B2 - Animal/Pet Waste - Program Enhancement	Coordinate with local partners to identify additional sites for pet waste disposal stations in public areas and assist with placement and maintenance.	Continue to collaborate with local partners to identify additional prospective pet waste stations.	By April 2015 and By April 2018	Update and maintain a list of possible locations.	100% Completed <ul style="list-style-type: none"> • List updated
				Continue to coordinate or otherwise assist with installation and maintenance of any new sites.	By April 2016 and By April 2019	Installation and maintenance of new sites.	100% Completed <ul style="list-style-type: none"> • 1 dispenser • 1 full station • 10,200 bags
	Animal/Pet waste	B2 - Animal/Pet Waste - Program Enhancement	Continue identification and waste management assessment of pet care providers and services.	Continue to identify, review and update list of pet supply, service, and care facilities. Assess and develop outreach needs and options	By April 2017	Update list of facilities and outreach needs and options.	10% completed <ul style="list-style-type: none"> • List maintained • Site distribution ongoing
				Conduct assessment and/or make contact with participating owners/operators and track facility participation.	By April 2018	Assess and/or contact participating facilities. Track participation.	10% completed <ul style="list-style-type: none"> • List maintained • Site distribution ongoing
	Animal/Pet waste	B2 - Animal/Pet Waste - Program Enhancement	Continue pet waste outreach and education at public events and distribute outreach materials at pet-related businesses.	Identify and review options for distributing outreach material such as brochures and hold Canines for Clean Water pledge events.	By April 2016	Update list of distribution sites and hold public events.	100% completed for pledge events 10% completed <ul style="list-style-type: none"> • List maintained
				Review and update educational materials as needed.	By April 2017	Review, revise, and approve current educational.	50% completed <ul style="list-style-type: none"> • Review completed

POLLUTANT	SOURCE of POLLUTANT	STRATEGY What we are doing & will do to reduce pollution from this source	ACTIONS Specific ways to implement strategies	BENCHMARK Intermediate indicators to know progress is being made	TIMELINE	MEASURE How we will track implementation & completion	STATUS
			Wildlife feeding outreach and education.	Continue to coordinate with the park district and City Operations staff to identify locations of wildlife feeding. Update list and where appropriate post signs.	By April 2016 and By April 2018	Update list of locations. Post signs and distribute educational material.	100% on installs • 2 signs 10% on additional locations
				Explore development of a pest management program and adopting a wildlife feeding ordinance.	By April 2017	Review done and options investigated.	No activity this report period
	Sanitary wastes	B3 - Septic Tank, Transient Camping and Private Sanitary Infrastructure Outreach and Education	Maintain a septic system inventory program 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.	Maintain a septic system inventory within the City limits.	Ongoing	Continued maintenance of septic system inventory and tracking database.	100% completed • List maintained
				Work with property owners within the City limits to provide public sanitary services when feasible. Continue to incorporate and extend services as appropriate.	Ongoing	Properties within the City Limits connected to public system when feasible.	100% completed • 1 sewer extension completed • 1 sewer extension planned
				Review, update, and deliver outreach and educational materials to owners as appropriate.	By April 2016 and By April 2018	Update and distribute outreach and educational material.	100% for distribution • 177 mailed • 10 at events • 150 to LC Sanitarian 10% material update
				Continue investigations into illicit commercial waste disposal practices.	By April 2015 and By April 2017	Identify additional audiences; develop and deliver educational material.	100% complete with assessment • Assessment document drafted 10% on material development and update
				Review transient camping procedures, and focus additional efforts where sanitary waste or other waste impact open waterways. Seek enforcement through existing codes/statutes, as	By April 2017	Review and update policies and procedures, priority list, and tracking program.	No activity this report period
				Work with land owners to enforce illegal camping regulations on private property.	Ongoing throughout the cycle	Work with land owners to enforce illegal camping.	100% complete

POLLUTANT	SOURCE of POLLUTANT	STRATEGY What we are doing & will do to reduce pollution from this source	ACTIONS Specific ways to implement strategies	BENCHMARK Intermediate indicators to know progress is being made	TIMELINE	MEASURE How we will track implementation & completion	STATUS
			resources allow.	Assess known campsites on public land and update the priority list for removal. Continue to investigate campsite deterrent measures.	By April 2018	Assess known illegal camp sites.	<ul style="list-style-type: none"> • 1 assessment • 32 cleanups • 3 interagency cleanups
	Public Interaction	B4 – Public Outreach and Education	Review, update, develop, and distribute outreach and education materials to the public, as needed.	Staff will continue to evaluate needs, types of bacteria related activities affecting water quality, continue to develop educational material and distribution options.	Annually Starting January 2015	Develop/distribute materials and research distribution options.	100% complete <ul style="list-style-type: none"> • Review/evaluations began in 2015
Mercury	Construction site soil erosion	M1 - Limit Construction Site Erosion	Continue to review existing LDAP construction site erosion control program, identify any additional program needs, and assist with program modifications or support to enhance program effectiveness.	Staff will review the LDAP program to determine if program revisions, enhancements, or modifications are appropriate.	By April 2015	Review of current program and updates made.	100% complete <ul style="list-style-type: none"> • LDAP Program Book • Educational material
				Work with the DEQ to re-new the IGA for construction activities within the City of Springfield.	Target date by Nov. 2015	City Council approval of IGA for construction activities.	100% complete <ul style="list-style-type: none"> • Staff participating in state wide process
		Continue Water Resources staff participation in plan review & expand Water Resource staff involvement in the approval process.	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.	100% complete <ul style="list-style-type: none"> • Site plan reviews 	
	M2 - Enhance Post Construction Support	Continue to implement a post-construction BMP inspection program to ensure maintenance of WQ BMPs at private sites.	Review program needs, available staff, and resources.	By April 2016	Assessment of program, staff, and resource needs.	25% completed <ul style="list-style-type: none"> • Full review in 2016 • Ongoing program management 	
			Continue program implementation within resource limitations.	Ongoing throughout the cycle	Continue implementation of a Stormwater Facility Management Program.	100% complete <ul style="list-style-type: none"> • Water Quality Mgt. Program inventory and inspections 	

POLLUTANT	SOURCE of POLLUTANT	STRATEGY What we are doing & will do to reduce pollution from this source	ACTIONS Specific ways to implement strategies	BENCHMARK Intermediate indicators to know progress is being made	TIMELINE	MEASURE How we will track implementation & completion	STATUS
	Urban street runoff	M3 - Evaluate/Enhance Street Sweeping, Catchbasin, and Pipe Cleaning Programs	Review with DPW Operations staff the current street sweeping, catchbasin & pipe maintenance programs, equipment, and schedule; identify program needs.	Review existing sweeping and CB and pipe cleaning programs, equipment, technology, and complaints with Operations staff; adaptively manage as resources allow.	By April 2016	Review, approval and implementation of updates to the current programs.	100% complete on implementation 10% complete on review
	Hazardous waste control	M4 - Hazardous Waste Control	Identify sources of mercury pollution and what household products, electronics, appliances, etc... may contain mercury and determine what pollution prevention projects/programs are feasible to implement.	Mercury pollution source assessment; research sources of mercury and determine what pollution prevention projects/programs the City has resources to implement.	By April 2016	Complete mercury pollution source assessment.	100% completed • Sources identified • Brochure developed
			Use household hazardous waste collection events to reduce the improper disposal of items containing mercury.	Springfield will continue to participate in the support of events such as the Lane County household hazardous waste events including outreach at public events such as home shows, Spring Cleanup and Earth Day.	Ongoing throughout the cycle	Participate in public collection events and promote outreach.	100% completed • Spring Cleanup
	Public Interaction	M5 – Public Outreach and Education	Develop and distribute outreach and education materials to the public.	Staff will continue to develop/distribute educational material and research education options.	Annually Starting April 2015	Review, update, and distribute educational materials.	100% complete • All edu material reviewed • Brochure development