

City of Springfield

TMDL Implementation Plan Eleventh Year Annual Report 19-20



Glacier Meadows Swale

Submitted Oct 2020 for July 1, 2019 thru June 30, 2020



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Purpose

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

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

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

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 (BMP's) 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 after this submittal. Springfield will continue to submit copies of the Annual Reports covering the time frame from July 1st to June 30th of each year to the MS4 Stormwater Coordinator. This dual reporting will continue until Springfield is advised otherwise.

Background

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

sections of waterways, that have failed to meet state water quality standards for one or more listed pollutants.

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

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

Regulatory Context

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

Reporting Requirements

This Annual Report is required to include the progress and/or status of Springfield's TMDL Implementation Plan, 2019 and its 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 (Table 1) will provide information about each strategy, implementation methods and progress or status in meeting the plan's goals.

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

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

Pending MS4 General Permit litigation, some of the current programs and projects that are currently being implemented for illicit discharge, SSO response, code reviews, post-construction

management, assessments, construction site runoff, and public education and outreach, may change direction or be eliminated. These changes, if any, will be implemented through the Adaptive Management process and submitted to the DEQ TMDL Basin Coordinator upon development.

Summary of Work Accomplishments

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

Temperature:

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

Summary:

- A desktop assessment and a priority list have been completed. This was accomplished in year 1 reporting. This effort is being continued with a channel restoration priority project list and is incorporated into the City CIP process. A review of the assessment and list was completed January 2017 and reported in a previous annual report. No actions are required during this reporting period; the next review will be by April 2021
- Continued work on potential sites for shade planting. The City hosted 4 Stream Team events which included planting trees and shrubs, and cleaning up garbage along waterways and water quality facilities; 1,685 trees/plants were planted. These events included community groups, and volunteers.
- The Mill Race Restoration Project Phase 1 is complete. Shade planting was a priority at this site with canopy trees being planted along the channel banks. Phase 2 of the project, the pond/wetland areas, has been completed with canopy trees being planted along the main channel. This project is in the O&M stage with ongoing maintenance and vegetation monitoring. Operations cleared around 20 ac. of invasive plants this reporting cycle.
- A stormwater treatment park along the north bank of the Mill Race has been completed. This facility also provides education via signage and a trail system. The treatment park enhanced this area greatly by converting an open industrial area full of invasive plants into a natural vegetated and treed facility. Additionally, providing pre-treatment and cooling of industrial and stormwater runoff before it enters the Mill Race. The monitoring project began in FY19 but in FY20 the sampling was not able to take place due to COVID-19 closures. The City plans to pick this back up in FY21. The multi-use path along the Mill Race and Stormwater Treatment Park is completed. This trail system runs along the top

of bank of the Mill Race and begins at the treatment park; it too had native vegetation and trees added in place of the invasive species removed. Educational interpretive signs were install last reporting cycle. This reporting cycle staff gave a tour to the USACE and to the Oregon Chapter of the American Planning Association.

- The Channel 6 Stormwater Master Plan design and construction work is on hold pending the competition of a street bond project. Study work is completed. This project will incorporate a series of treatment swales, invasive plant removal, and native vegetation and trees planted.
 - The 48th Street Channel restoration project continued with design work, and site visits. Project coordination for this reporting period involved moving forward with an implementation action plan and securing funding and agreements. Design work was completed for a pre-wetland filtering trash rack; installation was expected late 2018. This project has unfortunately been canceled due to the inability to obtain permits for work.
 - An intern was hired and began drafting an enhancement plan and design work for the 72nd Street Channel. This site is ready for shading, vegetation, wetland and flow improvements.
 - In the newly expanded UGB areas, natural resource inventories began, including identifying needs and implementing a request for proposal (RFP) process for wetland and natural resource area updates to the Local Wetlands Inventory (LWI). This project is supported by a grant.
 - Staff continued to work with the Long Tom Watershed Council on the Urban Waters Partnership Program and has since expanded its efforts to include additional partners such as SUB and EWEB. This partnership focuses on private stormwater retrofits and enhancements.
- T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement
 1. Additional review of Development Code for parking lot, streetscape, vegetation management, setbacks and buffers, and retrofit practices; review development code and amend if appropriate.
 2. Mill Race restoration management and enhancement; continue to identify discrete projects that can advance overall restoration.

Summary:

- The major review of the Springfield Development Code to include new technology, designs and ideas for improving water quality was completed under the first TMDL Plan. Low Impact Development Approaches, Engineering Design Standards and the Development Code continue to be reviewed and improved upon to optimize shading, address pervious pavements, and stormwater discharge alternatives. A review of existing codes and standards pertaining to riparian areas, parking lots, and streetscapes was conducted and found to be acceptable and in

compliance at this time. There was no TMDL goal to be implemented during this reporting period; code review is due by April 2021 with any needed updates by July 2022.

- A review of the Springfield's Engineering Design Standards and Procedures Manual for chapters pertaining to water quality facilities, water quantity, facility design, vegetation and tree standards, and riparian enhancement, was put on hold pending Phase II General Permit litigation. Currently no changes are needed. There was no TMDL goal to be implemented during this reporting period; code review is due by April 2021 with any needed updates by July 2022. Additionally, there were minor changes to Chapter 6, the landscape section during an update that the Traffic Division implemented. Water Resources staff provided comments.
- Staff continues to work with developers, through the development review process, on providing large canopy trees, maximizing vegetative treatment and/or incorporating additional vegetation into planned project sites.
- A new streetscape project called the Virginia Daisy Bikeway is currently in phase 2; design work and phase 1 took place during this reporting period. This project incorporates a skinny green street design with trees, swales, and a bike path.
- As mentioned above, the Mill Race Restoration Project is in the O&M stage with ongoing maintenance and vegetation monitoring. A stormwater treatment park, a multiuse path, and parking entrance at a trailhead have been completed and reported the last reporting period.
- Additional work was completed to enhance the Over/Under Channel. This channel was reconstructed and revegetated per current development code which requires installation of trees and shrubs.
- Phase 1 of the Franklin Boulevard Redevelopment Project was completed. This redevelopment included re-landscaping a bleak industrial corridor with vegetated round-a-bouts, vegetated park strips and medians with trees, and water quality facilities in and along the corridor. It includes three large infiltration swales, numerous other smaller street side infiltration swales, and pervious pavement. Work continues with design, construction funding, and grant applications for Phase 2 work.
- O&M continued on the MR with invasive plant removal- over 20 acres were cleared but falls just outside of this reporting period due to COVID-19 closures. Work occurred between July 2020 and August 2020.
- Brooklyn Swale is an additional public facility that went in just off of Franklin Blvd in Glenwood. It was added to address flooding in the area. This facility replaces a section of asphalted and impervious area with vegetation and treatment.
- The LIDA Policy Evaluation component of the Glenwood Stormwater Evaluation completed in Fall 2019 reviewed, assessed, and recommended amendments to Section 4.17.1 of the EDSPM (City's requirements for Low Impact Development Approaches (LIDA) to ensure that they: a) Accurately align with the policies and

implementation strategies of the Phase I Glenwood Refinement Plan (Appendix A) for stormwater quality management; b) are clear and objective; and c) adequately detail the procedures, criteria, and tools necessary to implement the Phase I Glenwood Refinement Plan stormwater quality management policies.

- T3 - Manage Industrial Warm Water Discharges

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

Summary:

- Staff continues to review 1200z permits and Pollution Control Plans for industries in Springfield's jurisdiction. Staff reviewed one 1200z permit that was reissued and provide comments to the DEQ. Staff solicited all 22 industries within Springfield's jurisdiction for updated pollution control plans and monitoring data.
- The Water Quality Facility Management Program continued to inventory, inspect, and enforce compliance for both public and private sites. Some of the private sites are industrial sites with warm water discharges; this program ensures compliance with water quality facility maintenance and checks for illicit discharges, including warm water discharges, by visiting these sites on a routine basis and noting any warm water discharges. Reporting data pertaining to the WQF Management Program is included in Springfield's MS4 Annual Report, dated October 2020.
- Staff completed an assessment of industrial and commercial sites in 2017-2018; over 600 businesses within the UGB were identified and ranked based on a list of criteria which influence the site's potential to pollute. In 2018-2019 outreach to storage and business park facilities and asphalt companies were conducted as a result of the assessment. Staff identified washing activities using soaps, chemical, and warm water as a concern at these types of facilities. During this reporting period staff continued with updating the list and reviewing outreach options. Additionally, three meetings were held with regional partners, No outreach BMP letters were sent out due to COVID-19 closures.
- Under the first TMDL IP, educational outreach materials were developed and distributed to mobile pressure washing companies, pressure washing rental companies and home improvement centers that sell pressure washers. The material addresses warm water discharges and City regulations. Outreach material goes through an annual review process, the intention of the review is to ensure they are up-to-date and provide the target audience with the best management practices for warm and/or polluted water. Staff restocked 2 booklets and 37 brochures in FY20.

- T4 – Public Outreach and Education

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

Summary:

- Staff continues to revise and update existing education and outreach materials and participate in clean water classes in schools and community events such as; Earth Day, Regional Pressure Washing Campaign, Fish Friendly Car Wash Kits, Public Works Week, Career Day, Youth Day of Caring, Lane County Home Show, BRING Tour of Homes, and garden shows. This year some of the outreach venues were closed and the events did not take place because of COVID-19 statewide closures.
- 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 was completed and material updated as appropriate. The booklet series continues to be distributed in stores and at events. In FY20, 190 brochures went out to the public at distribution sites, and 242 brochures were given away at events.
- Educational 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 outreach material addresses warm water discharges and City regulations. Staff reviews material annually and updates the material as appropriate.
- IDDE response, educational outreach, and enforcement continued in response to temperature related discharges, vegetation removal, and yard debris dumping.
- School workshops continue to include temperature as a pollutant discussion and the importance of tree shading along banks of streams. A total of 700 students attended fall classes. Staff redesigned the Clean Water University Program in 2018 to include wastewater education and now includes Eugene's 4J and Bethel school Districts.
- The Mill Race interpretive signs along the path continue to be maintained and provide educational information to the public.
- The pollution prevention educational portfolios were updated and restocked. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address warm water as a pollutant.
- Car washing water not only contains warm water but also soaps, chemicals and oils. In FY20, 51 Fish Friendly Car Wash Kit flyers were sent out to HOA's, churches, and youth groups. Four car wash kits were used to prevent warm, soapy water from entering the storm system; 3 incentives given out.
- The Water Quality Facility Management Program provides outreach and educational information with every condition report. Staff stresses the importance

of a canopy and shrub coverage in water quality facilities. In FY20, 200 O&M reminder postcards were mailed out.

- The City's Up Stream Art project had its fourth successful year. Advertisements, media spots, social media feeds, and staff interview all provided an opportunity to discuss stormwater pollution; the art as well sends a message out daily.
- The City along with regional partners started a zinc study and education project. This project will focus on sources of zinc and identify educational opportunities. Zinc is mostly used by the general public to control moss. Too much vegetation and/or vegetation in the wrong place can promote moss growth causing the over use of control agents. This project will include public education about how to prevent moss growth and also stormwater-friendly ways to remove it.
- Staff participated in the Environmental Connect event where over 100 students participated. Staff interacted with over 30 students and 25 of them took materials related to stormwater programs in Springfield and Springfield's Stream Team.

The goals and tasks for temperature reduction as outlined in the 2019 TMDL IP are all on track. Pending the MS4 General Permit final litigation, some of the current programs and projects that are currently being implemented for illicit discharge, code reviews, post-construction management, construction site runoff, and public education may change direction or be eliminated.

Bacteria:

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

Summary:

- 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. IDDE staff reviewed all SOPPs, and program documents. Updates to protocol, staff changes, and contact information were made to reflect the most current information. The program description was updated during this reporting period as well.
- SSO and SOPP procedures and protocols continue to be reviewed as needed and/or after an incident. Springfield continues to place high emphasis on providing the proper handling and reporting procedures to staff and regulatory agents in responding to any SSO within its jurisdiction.
- Contractors working on new or existing sanitary systems under City supervision continued to be provided with information for proper reporting. Staff discussed

additional outreach options. Some of these options may be implemented next reporting period pending MS4 General Permit litigation outcome.

- IDDE and Operations staff continue to respond and address bacteria related discharges as they are identified. Staff responded to zero SSO's during this reporting period.
- B2 - Animal/Pet Waste - Program Enhancement
 1. Continue to work with local partners to identify locations for pet waste stations; install and maintain stations.
 2. Continue to identify pet care providers and services and identify outreach opportunities; update facility list and continue to distribute educational materials.
 3. Continue pet waste education and public events; identify options for material distribution, hold events, and update material as needed.
 4. Wildlife feeding outreach and education; continue to identify locations, appropriate outreach methods, track distribution, and explore options of a wild life feeding ordinance.

Summary:

- During this reporting period, discussions with Willamalane Parks and Recreation District, Springfield School District19, and City Operations Division staff identified additional locations for pet waste stations or bag dispensers. Stations and dispensers continue to be installed as locations are identified; three new stations were installed. Staff and partners continue to monitor existing stations, replace bags and evaluate new locations. A total of 54,300 bags were distributed to partners for distribution and 5,800 bags were distributed by city staff during this reporting period.
- In previous years, pet parks, kennels, pet supply stores, and pet daycare facilities have been identified and outreach material developed. City staff continues to work with facilities on waste handling and problem areas as needed. Staff updated the pet service providers list.
- 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. A total of 100 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 Pet Fest, Spring Clean-up, Canines for Clean Water pledge events, and Regional Pressure Washing Campaign. This fiscal year poop bags, yard signs, and brochures were distributed at Pet Fest, UpStream Art, the Good Earth Home Show, and the Children's Celebration, but events typically held in March-June of 2020 were cancelled because of COVID-19.

- The “Canines for Clean Water” program continues to be a success. Springfield residents submitted photos for the 2020 contest and pledged to pick up after their pet. The 2021 calendar contest drew 86 pledges. The contest was promoted through social media. One public booth event was held during the reporting period; 129 pledges were made by residents either while at the event or through City Hall. Additionally, 281 bag holders, 123 bandanas, 5 business signs, and 103 yard signs were distributed to the public. The Canines for Clean Water Calendar continues to be a hit as well; 3,845 2020 calendars were distributed at local pet supply 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; 6 new signs were given to Willamalane during this reporting period.
 - Staff explored the development of a wildlife ordinance during previous reporting periods. It was decided that education and outreach should remain the primary tool for encouraging the desired behavior. The next discussions and exploring of options is due by April 2022.
- B3 - Septic Tank, Transient Camping & Private Sanitary Infrastructure Outreach & Edu
 1. Maintain septic tank inventory program; maintain inventory, update educational materials, and work with property owners to provide sanitary services where needed.
 2. Continue investigation into sanitary waste disposal practices; continue to identify targeted audiences.
 3. Review transient camping procedures; update as needed, work with property owners, and assess known sites.

Summary:

- The septic tank inventory within the City limits is complete; sites continue to be added to the inventory when discovered, or removed when connected to the City sewer system. The septic system inventory is now accessible via the City’s mapping application. Thirteen surveys were sent out to property owners where the status of their system was unknown.
- During this reporting period, five septic systems were decommissioned and connected to the City sewer system.
- The septic system guide for homeowners was updated during this reporting period and was mailed out to all property owners and residents in the City Limits; 200 brochures total. In addition, 3,200 were provided to Rainbow Water to distribute as a billing insert and at the counter.
- No sanitary sewer extension or rehab projects were completed during this reporting period, but design and planning work took place. The assessment of commercial bacteria waste was completed in a previous reporting period; it was

reviewed and updated in FY20. Six potential bacteria sources have been identified with educational outreach and site assessments implemented for some of the sites. One BMP mailing occurred during this reporting cycle to four types of businesses: aquariums, meat and poultry, drain cleaners, and portable sanitation companies.

- 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 6 camps were cleaned up by the City and there were 2 regional meetings. 1 large inter-agency cleanup took place with City staff participating in the annual Willamette River Clean Up. During the latter part of this reporting period because of Statewide COVID-19 closures and policy changes on enforcement of transient camping (Statewide), only sites that were considered a health hazard were responded to. Additionally, a review of procedures was done.

- B4 – Public Outreach and Education

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

Summary:

- Staff continues to revise and update existing education and outreach materials pertaining to bacteria; an evaluation of the educational material was completed with materials being updated. 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. A review and update of the pet services list was completed and 100 brochures distributed. Distribution numbers were lower this year due to COVID-19 closures.
- Clean Water University provides hands on education about water quality and ways to prevent bacterial pollution such as picking up after pets. The fall session was held with 700 students attending.
- The City’s Little Litter Campaign is ongoing; four signs were provided to building maintenance staff to post near City Hall. This campaign focus on the small such as cigarettes butts, gum, wrappers, food, cans and bottles, plastic, disposable diapers, wipes, etc. Three illicit discharges that involved private sanitary waste were responded to and eliminated and three illicit graywater

discharges were also eliminated. Owners were provided with bacteria and waste information.

- All outreach and educational material went through a review and update process. The pollution prevention educational portfolios were updated and restocked. These portfolios contain education and outreach material easily stored in key City vehicles. Some of the factsheets address bacteria from pets and wildlife as a pollutant.
- The IDDE response staff continues to hand out factsheets about bacteria from sources such as pet waste. The UpStream Art Project included information and discussions with the public about the importance of picking up after pets, maintaining septic systems, and not feeding wildlife.
- Provided Willamalane Park District with 6 no wildlife feeding signs.
- The septic system guide for homeowners was updated during this reporting period and was mailed out to all property owners and residents in the City Limits and Urban Transition Zone.
- Staff participated in the Environmental Connect event where over 100 students participated. Staff interacted with over 30 students and 25 of them took materials related to stormwater programs in Springfield.

The goals and tasks for bacteria reduction as outlined in the 2019 TMDL IP are all on track. Pending the MS4 General Permit final litigation, some of the current programs and projects that are currently being implemented for illicit discharge, SSO response, code reviews, post-construction management, assessments, and public education may change direction or be eliminated.

Mercury:

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

Summary:

- The Land Drainage and Alteration Program (LDAP) staff continues to monitor and work on streamlining the permit process. Municipal code addressing LDAP code and erosion concerns was developed, adopted by Council, and implemented previously. No changes were made during this reporting period due to the MS4 General Permit litigation; substantial program changes may be needed. Review and updates were not TMDL IP goals this reporting period; the next review is due by April 2021 and updated if needed by July 2022.
- Springfield continues to implement permit and program compliance that meet 1200-CN NPDES permitted activities within the City Limits. Reporting data pertaining to 1200-CN permits is included in Springfield's MS4 Annual Report dated October 2020. 1200C Permit application and information is referred to the

OR DEQ. Staff did review and update related education and outreach materials and posted updates to the City webpage.

- The City continues to maintain CESCL certification for two LDAP staff and has additional staff in Water Resources, Operations, and Engineering that maintains certification.
- LDAP program inspection and compliance continues to provide erosion and sediment control enforcement and compliance. See MS4 Permit Annual Report for compliance detailed information.

- M2 - Enhance Post Construction Support

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

Summary:

- Water Resource staff continues to be active in Development Plan Review, Pre-Development Review, and Pre-Construction meetings and process.
- A Water Quality Facility Inventory and Inspection Program to ensure long-term O&M of facilities is ongoing. Inventory collection and mapping is ongoing and inspections continue. The Post-construction inspection program started in July 2010, inspections occur every year during the summer months starting in July. Inventory mapping occurs just prior to inspections and is ongoing as new facilities are constructed or identified. Reporting data pertaining to the WQF Management Program is included in Springfield's MS4 Annual Report dated October 2020. The existing level of effort for this program will be reviewed pending the MS4 General Permit litigation. Potential General Permit language could have a major impact on the amount of facilities that are subject to construction and inspection, thus a different approach to implement this program will be needed. 56 new facilities inventoried and 465 facilities inspected or re-inspected – both vegetated and structural. 2 vegetated facilities found in non-compliance, 60 structural facilities found in non-compliance, and 1 citation. There were 206 reminder postcards mailed out.
- A review of the City's EDSPM Chapters 3, 4, and 6 (design standards for water quality, stormwater management, and vegetation) is on hold pending MS4 General Permit litigation.
- Water Resource staff currently participates in major infrastructure and Code update projects; Two public projects, the Brooklyn Swale and the Virginia Daisy Street Project either implemented or will implement design standards specific to their areas that pertain to water quality and LID approaches.
- Water Resource staff continue to map and track the presence of well head protection signs at locations that have water quality treatment and signage requirements; this is done as part of the Water Quality Facility Management Program.

- M3 - Street Sweeping, Catchbasin, and Pipe Cleaning Programs
 1. Continue to implement current programs for sweeping, basin cleaning, and storm drainage pipe cleaning; adaptively manage program practices and standards.

Summary:

 - Currently, 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 5,177 curb miles of routine sweeping took place in FY20 with 1,268 tons of material removed.
 - 757 catch basins were cleaned; numbers were low due to COVID-19.
 - Over 7,517 feet of storm line was cleaned and ditch reshaping/sediment removal was done on over 4,879 ft. of system with 17 tons of material removed.

- M4 - Hazardous Waste Control
 1. Identify sources of mercury pollution and determine what type of projects can be implemented. Review and update the source assessment.
 2. Use household waste collection events to encourage proper disposal of items containing mercury.

Summary:

 - Staff continued to research sources of mercury and mercury pollution and what household products, electronics, and appliances may contain mercury. A brochure was developed in FY16, a total of 19 brochures were distributed during this reporting period with 60 vouchers for a thermometer trade-in handed out.
 - Development and Public Works continues to hold the annual Springfield “Spring Cleanup” event that collects electronics and other waste for recycling and proper disposal. The event takes place in May every year but was postponed until Sept. or Oct. this year due to COVID-19 social event restrictions. It will fall into the next reporting period. The City continues to be an active member of regional groups that address household hazardous waste.
 - ESD staff continues to participate in the Regional “Eco Biz” Program that addresses and promotes recycling and spill control with local auto shops. The City’s Fleet Maintenance Facility continues to maintain its Eco-Biz Certification. The Eco-Biz program had 2 re-certifications, 2 inspections, and conducted 2 site visits. One mailing went out to 60 businesses providing information about the program.
 - Not all auto shops can achieve State Eco-Biz status, but may qualify as a “Clean Water Business” through the City program. Both programs promote recycling, and proper storage of hazardous material. 65 letters went out to auto shops and 10 to car wash facilities in Springfield’s jurisdiction. There was some participation

and interest this last reporting cycle where one shop was inspected and one certified as a Clean Water Biz. The list of facilities was updated.

- The City of Springfield, in collaboration with the City of Eugene, Oregon DEQ, and Oregon ACWA continue to implement 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 providing educational outreach about the rule leading up to the October 12, 2020 deadline for submission of the one-time compliance report from all existing sources. As of June 30, 2020 Springfield has received 80% of one-time compliance reports from dental dischargers in the Springfield service area. 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 the 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.
 - A drug take back box for unwanted pharmaceuticals was installed at the City Police Department in previous years. Although the drug take back box does not directly affect the collection of mercury it has been very effective in collecting and removing pharmaceuticals from the waste stream and heightening people's awareness. Some pharmaceuticals can or do contain mercury, but the city does not track that information. One regional drug take back round up event was held in October.
- M5 – Public Outreach and Education
 1. Continue to review, develop, and distribute outreach and education materials to the public as needed.

Summary:

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

maintenance of facilities cleans out potential contaminated sediment. Postcards are sent out every year reminding owners to maintain their facilities; proper O&M will ensure a healthy and fully vegetated facility which in turn will provide treatment, infiltration, and cooling of runoff. A total of 206 reminder postcards were sent out this reporting cycle.

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

The goals and tasks for mercury reduction as outlined in the 2019 TMDL IP are all on track. Pending the MS4 General Permit final litigation, some of the current programs and projects that are currently being implemented for illicit discharge, code reviews, post-construction and construction management, and public education may change direction or be eliminated.

Adaptive Management Measures

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

There are no adaptive management requests being made for this reporting period. Pending the MS4 General Permit final litigation, some of the current programs and projects that are currently being implemented may change direction or be eliminated in the next reporting cycle.

Implementation Matrix

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

Table 1 – 2019 TMDL Implementation Tracking Matrix

POLLUTANT	SOURCE of POLLUTANT	STRATEGY <i>What we are doing & will do to reduce pollution from this source</i>	ACTIONS <i>Specific ways to implement strategies</i>	Division(s) Responsible and/or Lead	BENCHMARK <i>Intermediate indicators to measure progress</i>	TIMELINE	MEASURE <i>How we will track implementation & completion</i>	STATUS
Temperature	Solar radiation to surface waters	T1 - Inventory Existing and Potential Shade and Enhancement Areas		Engineering Division Water Resources Division	Review the existing inventory identifying potential sites.	By April 2021 – 1 st review. By April 2023 2 nd review	A reviewed and updated priority list of potential sites.	10% complete; Staff working on related prep work such as basin delineation, MS4 outfalls, surface waters, WOTUS updates. Not due until 2021
			Task 1 - Maintain a priority project list for riparian/channel enhancement projects.	Engineering Division Water Resources Division	Update the existing inventory identifying potential sites.	By July 2021 – 1 st update. By July 2023 2 nd update		
			Task 2 - Continue to work to develop public/private partnership projects.	Engineering Division Water Resources Division	Continue to explore available options for partnering on projects.	Ongoing throughout the cycle		
			Task 3 - Review existing natural resource inventories and identify needs.	Community Development Division	Review existing natural resource inventories and identify needs.	By July 2022		
		T2 - Riparian Area, Parking Lot, and Streetscape Shade Enhancement	Task 1 - Additional review of Development Code for parking lot, streetscape, riparian vegetation management, setbacks, and buffers, and retrofit practices.	Community Development Division Water Resources Division	Review the Development Code with key planning staff and determine if shading or riparian protection amendments are appropriate.	By April 2021	Review of Development Code for enhancement of riparian protection, parking lot shading, streetscape shading, setbacks/buffers and retrofit practices.	0% complete
				Community Development Division	If amendments are appropriate, staff may develop and initiate proposed changes for review by City Council, or work to include them in an amendment package.	By July 2022	Proposals brought to Council.	0% complete
			Task 2 - Mill Race restoration, management and enhancements	Engineering Division Water Resources Division	Work to identify discrete projects that can advance overall restoration. These include work both inside and outside of the initial ACOE study area, such as in the Lower Mill Race.	By April 2021 and again by April 2023	Review and update project list.	20% complete – no list review but planting continues. Planning and coordination with Middle Fork Willamette Watershed, Willamalane, and Operations. Scouts day planting along the Mill Race.

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	Warm water discharges	T3 – Manage Industrial Warm Water Discharges	Task 1 - Identify industries within Springfield's City limits with stormwater discharges and provide technical assistance to reduce warm water discharges and improve stormwater treatment where opportunities exist.	Water Resources Division	Continue to stay informed regarding the stormwater permits and provide feedback to industry and the DEQ, when applicable.	Ongoing throughout the cycle	Industrial stormwater permits reviewed, comments provided, and technical assistance provided as needed.	Ongoing: 100% this reporting FY - 1 permit reviewed and comments provided.
				Water Resources Division	Reviews the list of current industrial stormwater dischargers within Springfield and identify opportunities to provide technical assistance.	Review/update by July 2020 Review/update by July 2022	List reviewed and updated as needed; opportunities identified.	100% complete; by July 2020 list developed and outreach approach started.
	Public Interaction	T4 – Public Outreach and Education	Task 1 - Continue to review, develop, and distribute outreach and education materials to the public.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY
				Water Resources Division		By June 2020 and By June 2023	Educational material assessed.	100% complete; by July 2020 all PE materials reviewed and some material updated.
Bacteria	Sanitary sewer system	B1 - Sanitary Sewer Overflows - Work Practices	Task 1 - Review current standard operating procedures for sanitary sewer spill response. Amend or revise if appropriate.	Water Resources Division Operations Division	Review relevant SOPPs for spills and overflows.	by April, 2021	Review(s) completed	80% complete – no action this reporting FY; documents reviewed
				Water Resources Division Operations Division	Revisions, if needed.	by January 2022	Approve and implement new or amended SOPPs if appropriate	80% complete – no action this reporting FY; some updates made.
			Task 2 - Review contractor work provisions to ensure contractors understand Springfield's requirements for dealing with sanitary sewer spills.	Engineering Division Water Resources Division	Conduct review of relevant Springfield standard contracting specifications.	By April 2021	Review of contract specifications	0% complete – no action this reporting FY
				Engineering Division	Develop revisions, if needed	By January 2022	Adoption of new or amended contractor work provisions, if appropriate.	0% complete – no action this reporting FY
	Animal/Pet waste	B2 - Animal/Pet Waste - Program Enhancement	Task 1 - Coordinate with local partners to identify additional locations for pet waste disposal stations in public areas and assist with placement and maintenance.	Water Resources Division	Continue to collaborate with local partners to identify additional prospective pet waste stations.	By April 2020 and By April 2022	Update and maintain a list of possible locations.	1 st round 100% complete – contacted Willamalane, School District, and OPS
				Water Resources Division	Continue to coordinate or otherwise assist with installation and maintenance of any new sites.	By August 2020 and By August 2022	Installation and maintenance of new sites.	1 st round 100% complete – installed 3 new locations
				Water Resources Division	Continue to maintain an inventory of station locations	Ongoing throughout the cycle	Map updated and maintained.	Ongoing – 100% complete this reporting FY - locations tracked in PEO App.
				Water Resources Division	Continue to identify, review and update list of pet supply, service, and care facilities. Assess outreach needs and options.	By April 2020 and by April 2022	Update list of facilities and outreach needs and options.	100% complete for this reporting FY; list updated.

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				Water Resources Division	Continue to coordinate with facility owners on educational material distribution and track location and materials.	Ongoing throughout the cycle	Continued distribution of outreach materials.	Ongoing – 100% complete this reporting FY - material distribution continues.
				Water Resources Division	Continue to offer and provide facilities technical assistance in proper waste management.	By April 2020 and by April 2022	Reach out to participating facilities. Track participation.	100% complete this reporting FY; letters sent to businesses.
				Water Resources Division	Continue to identify and review options for distributing outreach materials that discuss proper waste management.	By April 2020 and by April 2022	Updated list of distribution sites	100% complete this reporting FY; options assessment completed.
				Water Resources Division	Review and update, as needed, program educational materials.	By June, 2020 and by June, 2023	Review, revise, and approve current educational.	100% completed this reporting FY; all material reviewed.
				Water Resources Division	Hold at least one Canines for Clean Water pledge event each fiscal year.	Starting July 2019	One pledge event per FY held.	100% complete this reporting FY; 1 event held and calendar contest held.
				Water Resources Division	Continue to coordinate with partners such as the park district and City Operations staff to identify locations of wildlife feeding, and if appropriate post signs.	By April 2021 and by April 2023	Updated list of locations. If appropriate, the number of new signs installed.	100% complete this reporting FY.
				Water Resources Division	Continue to track distribution and update inventory	Ongoing throughout the cycle	Location map updated and maintained.	Ongoing – 100% complete this reporting FY; sites tracked in App. and 6 signs went out.
				Water Resources Division	Continue to explore adopting a wildlife feeding ordinance.	By April 2022	Review done and options investigated.	0% complete; no action required this reporting FY.
				Water Resources Division Information Technology	Continue to maintain a septic system inventory within the City limits.	Ongoing throughout the cycle	Updated septic system inventory.	Ongoing; 100% complete this reporting FY
				Engineering Division	Continue to -work with property owners within the City limits to provide public sanitary services when feasible. Continue to incorporate and extend services as appropriate.	Ongoing throughout the cycle	Properties within the City Limits connected to public system, as appropriate.	Ongoing; 100% complete this reporting FY – 5 new connections.
	Water Resources Division	Review, update as needed, and deliver outreach and educational materials to owners.	By April 2020 and by April 2023	Outreach and educational material updated and distributed.	100% complete this reporting FY.			
	Water Resources Division	Continue to identify target audiences, and develop and distribute outreach material specific to them which incorporate BMPs and relevant regulatory requirements.	By April 2020 and by April 2023	Audiences identified; educational material developed and delivered.	100% complete this reporting FY.			
	Sanitary wastes	B3 - Septic Tank, Transient Camping and Private Sanitary Infrastructure Outreach and Education	Task 1 - Maintain a septic system inventory for sites within the City limits; work with property owners to provide public sanitary services when feasible. Review, update, and deliver educational material as appropriate.	Water Resources Division Information Technology	Continue to maintain a septic system inventory within the City limits.	Ongoing throughout the cycle	Updated septic system inventory.	Ongoing; 100% complete this reporting FY
				Engineering Division	Continue to -work with property owners within the City limits to provide public sanitary services when feasible. Continue to incorporate and extend services as appropriate.	Ongoing throughout the cycle	Properties within the City Limits connected to public system, as appropriate.	Ongoing; 100% complete this reporting FY – 5 new connections.
Water Resources Division				Review, update as needed, and deliver outreach and educational materials to owners.	By April 2020 and by April 2023	Outreach and educational material updated and distributed.	100% complete this reporting FY.	
Water Resources Division				Continue to identify target audiences, and develop and distribute outreach material specific to them which incorporate BMPs and relevant regulatory requirements.	By April 2020 and by April 2023	Audiences identified; educational material developed and delivered.	100% complete this reporting FY.	
		B3 - Septic Tank, Transient Camping and	Task 2 - Continue investigations into sanitary waste disposal practices.	Water Resources Division	Continue to identify target audiences, and develop and distribute outreach material specific to them which incorporate BMPs and relevant regulatory requirements.	By April 2020 and by April 2023	Audiences identified; educational material developed and delivered.	100% complete this reporting FY.

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		Private Sanitary Infrastructure Outreach and Education (cont.)	Task 3 - Review transient camping procedures, and focus additional efforts where sanitary waste or other waste impact open waterways. Seek enforcement through existing codes/statutes, as resources allow.	Water Resources Division Operations Division	Review and update procedures & priority site determination criteria with PD and Operations staff as needed.	By April 2020 and by April 2022	Policies, procedures, and priority list reviewed and updated.	100% complete this reporting FY; reviews by April 2020 – additional policy changes due to COVID-19 noted in documents.
				Water Resources Division Community Development Division	Work with land owners and regional partners, as needed, to enforce illegal camping regulations on private property.	Ongoing throughout the cycle	Enforcement of illegal camping that may impact open waterways.	Ongoing – 100% completed this reporting FY; enforcement a combination of IDDE and Code Enforcement.
				Water Resources Division Operations Division	Assess known campsites on public land and update the priority list for removal. Continue to investigate campsite deterrent measures.	By July, 2020 and by July, 2022	Assess known illegal camp sites and updated priority list.	100% complete this reporting FY; by July 2020 camps assessed and Ops cleaned 6.
	Public Interaction	B4 – Public Outreach and Education	Task 1 - Continue to review, update, develop, and distribute outreach and education materials to the public, as needed.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY.
				Water Resources Division		By June 2020 and by June 2023	Educational material assessed.	100% complete; by June 2020 all PE materials reviewed and some material updated.
	Mercury	Construction site soil erosion	M1 - Limit Construction Site Erosion	Task 1 - Continue to review existing LDAP construction site erosion control program.	Engineering Division	Staff will review the LDAP program to determine if program revisions, enhancements, or modifications are appropriate.	Review by April 2021 and update by July 2022, if appropriate.	Current program reviewed and updated, as appropriate.
Engineering Division					Refer construction activity within Springfield's jurisdiction that requires 1200C permits, to the Oregon DEQ.	Ongoing throughout the cycle.	Tracking of 1200C permit referrals.	100% complete this FY
M2 - Enhance Post Construction Support			Task 1 - Continue Water Resources staff participation in the City's development plan review process.	Engineering Division Water Resources Division	Continue involvement by engaging in the review process for proposals requiring engineering review and/or smaller scale developments that include water quality or LIDA.	Ongoing throughout the cycle	Involvement in the review process for developments having WQ and/or LIDA proposals.	Ongoing - 100% complete this reporting FY
				Engineering Division Water Resources Division Community Development Division	Continue to provide assistance, as needed, in the review and update of design standards and or codes as they relate to water quality facilities and post-construction development requirements.	Ongoing throughout the cycle	Involvement in the review and updating of design standards and or codes as they relate to water quality facilities and post-construction development requirements	Ongoing – 100% complete this reporting FY; no relevant code changes.
Task 2 - Continue to implement a post-construction BMP inspection program to ensure maintenance of water quality facilities at private sites.			Water Resources Division	Review program, adaptively manage, update as needed.	By April 2022	Assessment/review of program; updated as appropriate.	100% complete; program documents reviewed and updated.	
			Water Resources Division Engineering Division	Continue program implementation within resource limitations.	Ongoing throughout the cycle	Continue implementation of a Stormwater Facility Management Program.	Ongoing – 100% complete this reporting FY	

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	Urban street runoff	M3 - Street Sweeping, Catch Basin, and Pipe Cleaning Programs	Task 1 - Continued implementation of the current programs for street sweeping and catch basin and storm drainage pipe cleaning. Adaptive management of program practices and standards to enhance maintenance standards, as needed.	Operations Division	Continue implementation of street sweeping and storm system cleaning programs to reduce pollutants in the public ROW and drainage system(s).	Ongoing throughout the cycle	Ongoing tracking and reporting of street sweeping and storm system cleaning.	Ongoing – 100% complete this reporting FY
				Operations Division	Strive to inspect/clean at least 10% of City owned catch basins/inlets per year.	Starting July 2019	Strive to inspect/clean at least 10% of City owned catch basins/inlets per FY; track and report.	100% complete this reporting FY
				Operations Division Water Resources Division	Review existing sweeping, catch basin, and pipe cleaning program practices/standards and develop enhanced standards, as needed.	Review by July 2021 and update, as needed by January 2022.	Practices/standards reviewed and enhanced, as needed	5% complete – staff had meetings and discussion on topic
	Hazardous waste control	M4 - Hazardous Waste Control	Task 1 - Identify sources of mercury pollution and which household products, electronics, appliances, etc... may contain mercury and determine what pollution prevention projects/programs are feasible to implement.	Water Resources Division	Review and update, as needed the mercury pollution source assessment; research sources of mercury and determine what pollution prevention projects/programs the City has resources to implement.	By April 2021 and by April 2023	Complete Mercury pollution source assessment updated.	50% completed; research was conducted for a brochure update. No required actions this reporting FY.
				Development and Public Work Department	Springfield will continue to participate in and support events involving hazardous waste.	Ongoing throughout the cycle	Participate in public collection events and promote Lane County Hazardous Waste Collection Center.	Ongoing; 100% complete; thermometer giveaway, drug take back, and referrals made.
	Public Interaction	M5 – Public Outreach and Education	Continue to review, develop and distribute outreach and education materials to the public, as needed.	Water Resources Division	Continue to review, develop, and distribute educational materials.	Ongoing throughout the cycle	Material distribution will be ongoing throughout the plan cycle.	Ongoing – 100% complete this reporting FY.
				Water Resources Division				By June 2020 and By June 2023