



**City of Eugene, Oregon
Total Maximum Daily
Load (TMDL)
Sixth Annual Report**

*Submitted to Oregon Department of
Environmental Quality*

December 23, 2014



TMDL SIXTH ANNUAL REPORT

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1. INTRODUCTION

This report summarizes the progress of Total Maximum Daily Load (TMDL) associated activities conducted by the City of Eugene from July 1, 2013 through June 30, 2014, as described in the City of Eugene's TMDL Implementation Plan, approved by the State of Oregon Department of Environmental Quality (DEQ) on December 23, 2008. This document is the **TMDL Sixth Annual Report**.

Following this introduction, **Section 2** of the report provides background information on the Willamette TMDL and its implications for the City. **Section 3** provides information about which local area water bodies are addressed by the Willamette TMDL, references the City's pollution reduction strategies which are documented in the current TMDL Plan (2008), and refers to the updated TMDL Plan (2014), submitted in June 2014, which will guide the City's efforts into the future. **Section 4** includes a progress report for each TMDL activity identified in the current TMDL Plan, and an update on the other permits and programs that are relevant to the TMDL. **Section 5** references the City's annual municipal stormwater report for water quality monitoring results and analysis.

2. BACKGROUND

Eugene lies at the upper end of the Willamette watershed, as shown in Figure 2-1. The Willamette River flows for about 6 miles, from River Mile 184 to River Mile 178 through the City, as shown in Figure 2-2¹. The Willamette River is currently listed by the State of Oregon DEQ as a water quality limited river due to elevated water temperatures, elevated mercury concentration in fish tissues, and elevated bacteria levels, all of which at various points on the River may exceed State water quality standards. Other water bodies in the Eugene area that are tributary to the Willamette are water quality limited due to elevated bacteria levels, low dissolved oxygen levels, and elevated turbidity including, variously, Amazon Creek, Amazon Diversion Channel, and Fern Ridge Reservoir. When water quality standards are not met, the federal Clean Water Act requires that a TMDL to be established. A TMDL determines how much pollution can be discharged to a water body without exceeding water quality standards. On September 21, 2006, the DEQ issued the Willamette Basin TMDL as an Order, and submitted the TMDL to the Environmental Protection Agency (EPA) for approval. EPA approved the Willamette Basin TMDL on September 29, 2006.

¹ Figure 2-2 illustrates the seven major stormwater drainage basins that have been delineated in Eugene: 1) *Amazon Creek*, 2) *Bethel-Danebo*, 3) *Laurel Hill*, 4) *River Road-Santa Clara*, 5) *Willakenzie*, 6) *Willamette River*, and 7) *Willow Creek*. Note that the area depicted on Figure 2-2 is the 2002 stormwater basin planning study area which includes the Eugene city limits and the unincorporated area west of Interstate Highway 5 (I-5), and within the metropolitan plan boundary. The unincorporated portion includes land both within and outside the UGB. The City's responsibilities as a DMA apply only to the limits of its jurisdictional authority.

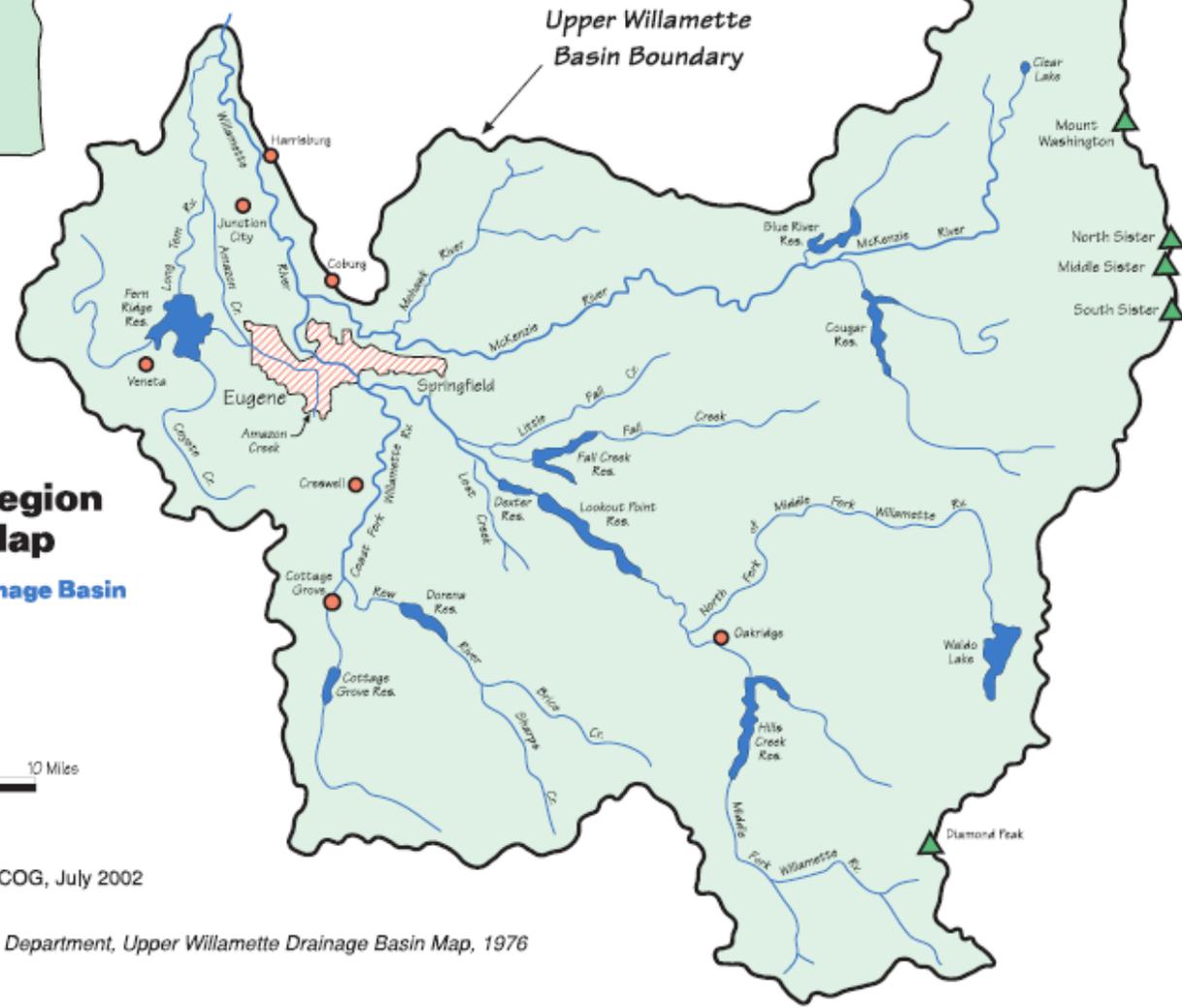
Along with other cities and agencies in the Willamette Basin, the City of Eugene was named by DEQ as a “designated management agency” (DMA) in that it has legal authority over sectors or sources contributing pollutants on the approximately 28,295 acres within the city limits, in that it operates the regional Eugene-Springfield Water Pollution Control Facility, a sewage treatment plant with permits to discharge stormwater and treated effluent into the Willamette River, and other regional facilities including the Eugene Airport. As such, the City of Eugene was required to develop a TMDL Plan to describe ongoing and planned activities that will be undertaken to achieve the TMDL pollutant reductions.

Discharges of surface water pollutants come from both point and nonpoint sources. Point sources, those that enter surface waters via a pipe or other conveyance, are regulated through the National Pollution Discharge Elimination System (NPDES) permitting program, administered in Oregon by DEQ. These NPDES permits serve as the TMDL Implementation Plan for the discharges they cover (industrial wastewater, municipal wastewater, industrial stormwater and municipal stormwater). References to these point-source permits and associated plans are included in this TMDL Plan for context. This TMDL Plan emphasizes strategies for the non-point sources of TMDL pollutants within the City’s jurisdiction and authority.

TMDL Plan rules, described in OAR 340-042-0080(3), include a requirement to “Implement and revise the plan as needed” which according to the DEQ TMDL Implementation Plan Guidance (May 2007), includes an annual report of progress on the implementation of each management strategy. This report summarizes the progress of TMDL implementation related activities for the period of time from July 1, 2013 through June 30, 2014, which coincides with the sixth year of implementation and the City’s fiscal year 2014.

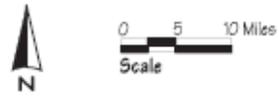


Drainage Basin Key



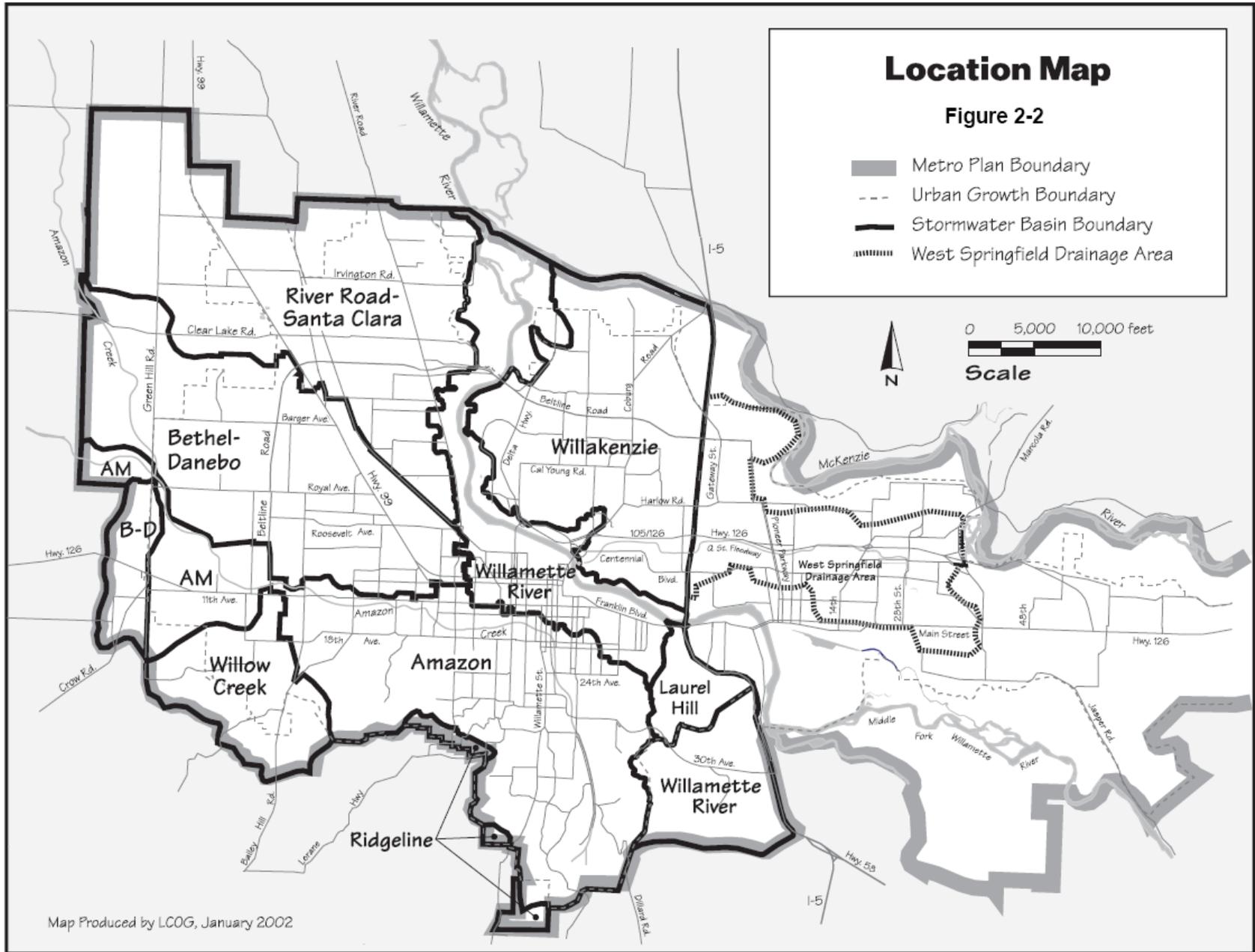
**Willamette Region
Location Map**
Upper Willamette Drainage Basin

Figure 2-1



Map Produced by LCOG, July 2002

Source: Water Resources Department, Upper Willamette Drainage Basin Map, 1976



3. LOCAL AREA TMDL WATERBODIES & STRATEGY DEVELOPMENT

Table 3-1 identifies waterbodies addressed by the 2006 Willamette TMDL that lie within or near the City of Eugene and may be affected by activities within the City of Eugene’s jurisdiction. The table includes the river miles affected, the TMDL parameter, and the season affected by the listing.

Table 3-1. Water Bodies and TMDL Pollutants²

Subbasin	Waterbody Name	River Miles	Parameter	Season
Upper Willamette	Willamette River	50.6 to 186.5	Temperature	Year Round
Upper Willamette	Willamette River	0 to 149	Bacteria	Fall/Winter/ Spring
Upper Willamette	Willamette River	174.5 to 186.4	Mercury	Year Round
Upper Willamette	A3 Channel	mouth to headwaters	Bacteria	Year Round
Upper Willamette	A3 Channel	mouth to headwaters	Mercury	Year Round
Upper Willamette	Amazon Creek	0 to 22.6	Bacteria	Year Round
Upper Willamette	Amazon Diversion Channel	0 to 1.8	Bacteria	Year Round
Upper Willamette	Amazon Diversion Channel	0 to 1.8	Dissolved Oxygen	Spring/Summer/ Fall
Upper Willamette	Long Tom River	0 to 24.2	Bacteria	Fall/Winter/ Spring
Upper Willamette	Fern Ridge Reservoir	24.2 to 31.8	Bacteria	Fall/Winter/ Spring
Upper Willamette	Fern Ridge Reservoir /Long Tom River	24.2 to 31.8	Turbidity	Year Round
Upper Willamette	Long Tom River	0 to 24.2	Temperature	Summer
Upper Willamette	McKenzie River	mouth to headwaters	Bacteria	Year Round

² Table 3-1 has been updated to include the McKenzie River watershed. Upon further review of the Willamette TMDL as part of the MS4 TMDL Pollutant Load Reduction Evaluation, it appears that the McKenzie River watershed area in Eugene (approximately 500 acres) should be included as an unreferenced tributary to the Upper Willamette River (see Willamette TMDL, Chapter 2, Table 2.8 and Chapter 11, page 11-3.)

a. Original (2008) TMDL Strategy Development

The City's TMDL reduction strategies were first outlined in its original (2008) TMDL Plan. In developing the strategies, the City considered the list of affected waterbodies reflected in Table 3-1, potential sources of TMDL pollutants, source categories and related management strategies listed in the Willamette Basin TMDL Water Quality Management Plan (Chapter 14), and existing programs and activities which address TMDL pollutants. From that analysis, the City developed reduction strategies for each TMDL pollutant. The reduction strategies are described in the City's original TMDL Plan and reflected in a matrix (2008 TMDL Plan, Appendix A – City of Eugene TMDL Implementation Plan Matrix) which summarizes the City's activities implemented or planned to carry out the strategies. The matrix has been updated each year to reflect progress in implementing the strategies, and submitted as part of the City's TMDL annual reports (Year 1 through Year 6, this report).

b. Updated (2014) TMDL Strategy Development

TMDL Plan rules, described in OAR 340-042-0080(3)(a)(C), include a requirement to “Provide for performance monitoring with a plan for periodic review and revision of the implementation plan” which, according to the DEQ TMDL Implementation Plan Guidance (May 2007), includes an evaluation every five years of the plan's effectiveness relative to pollution reduction goals. The City submitted its effectiveness evaluation (Part II of the TMDL Fifth Annual Report and Review) to DEQ on March 23, 2014, and followed up with an updated TMDL Implementation Plan on June 30, 2014, which included an updated matrix (2014 TMDL Plan, Appendix A – City of Eugene TMDL Implementation Plan Matrix). The updated TMDL Plan and matrix, subsequently approved by DEQ, describes the City's activities implemented or planned to carry out the strategies as of July 2014, which corresponds with the beginning of TMDL Year 7.

4. RELEVANT WATER QUALITY PERMITS AND PROGRAMS

This section includes an updated status for each City of Eugene TMDL activity (Section 4.a), an update on the other water quality permits relevant to the TMDL (Section 4.b), and an update and accomplishments for other programs relevant to the TMDL (Section 4.c).

a. TMDL Implementation Activities

Appendix A of this TMDL Sixth Annual Report includes the detailed list of activities implemented or planned by the City of Eugene for each TMDL pollutant to carry out the pollutant reduction strategies, amended to include status of each activity and progress made over the reporting period from July 1, 2013 through June 30, 2014. For those activities covered under an existing permit program, Appendix A includes a reference to the permit, and Section 4.b includes references to specific reports within which additional information is available.

With regards to the first two activities in the matrix (Stream buffers/ riparian protection to meet Statewide Planning Goal 5 and Statewide Planning Goal 6 requirements), some additional background information is provided in this section.

Statewide Planning Goal 5

Oregon's Statewide Planning Goal 5 requires all Oregon cities and counties "to conserve open space and protect natural and scenic resources." Land Use Code regulations that apply to the designated Goal 5 sites, in the form of the /WR Water Resources Conservation Overlay Zone, were adopted by the Eugene City Council in 2005 and 2006, and can be found in Chapter 9 of the Eugene City Code (go to City's web site: <http://www.eugene-or.gov>, follow links to: Government > City Code, and see Sections 9.4900-9.4980).

- During the Year 6 TMDL reporting period, two land use applications were submitted related to the /WR Water Resources Conservation Overlay Zone, and zero adjustment application requests were made.

Statewide Planning Goal 6

Oregon Statewide Planning Goal 6 requires the City to, among other things, "maintain and improve water quality." Land Use Code regulations establishing a /WQ Water Quality Overlay Zone, were adopted by the Eugene City Council in March 2009, and can be found in Chapter 9 of the Eugene City Code (go to City's web site: <http://www.eugene-or.gov>, follow links to: Government > City Code, and see Sections 9.4770-9.4790). An Administrative Order was adopted in June 2009, related to implementation of the /WQ Water Quality Overlay Zone code requirements. These regulations provide protection for waterways with a significant relationship to DEQ's list of water quality limited ("303(d)-listed") streams that do not already fall within the Goal 5 (/WR Overlay Zone) protections.

- During the Year 6 TMDL reporting period, zero land use applications were submitted related to the /WQ Water Quality Overlay Zone, and zero adjustment application requests were made.

With regard to the fourth activity in the matrix (Enhance streamside shading), during the Year 6 TMDL reporting period, City of Eugene staff utilized the Amazon Creek Basin Streamside Shading Assessment, developed during TMDL Year 5 and finalized in Year 6 (March 2014), to identify available areas adjacent to Amazon Creek to plant with shade trees. The shading assessment document, which was included in the Fifth Year TMDL Report, will continue to be instrumental in planning for shading activities in the Amazon watershed into the future.

b. Water Quality Permits

This Section of the report provides information about the status of water quality permits that cover certain discharges but have their own separate review and reporting processes, and the status of water quality permit programs that the City administers on behalf of DEQ.

As described in Section 2, discharges of surface water pollutants come from both “point” and “nonpoint” sources. Generally speaking, point sources enter surface waters via a pipe or other conveyances, whereas nonpoint sources discharge to surface waters directly or through overland flow (not via pipes or other conveyances). Discharge of industrial wastewater, municipal wastewater, and stormwater into waters of the United States are all regulated through the National Pollution Discharge Elimination System (NPDES) permitting program. The NPDES permitting program is authorized by Section 402 of the Clean Water Act and, in Oregon, the program is administered by the DEQ. The City of Eugene has obtained permits from DEQ under the NPDES program for its point source discharges to surface waters, including:

- **National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit #101244** (a permit issued to the City of Eugene for the municipal stormwater system discharges)
- **NPDES Wastewater Discharge Permit #102486** (a permit issued to the Metropolitan Wastewater Commission (MWMC) and the cities of Eugene and Springfield for the regional wastewater treatment plant discharges)
- **NPDES General 1200Z Industrial Stormwater Permit for the Eugene-Springfield Water Pollution Control Facility (WPCF) sites** (a permit issued to the MWMC for the wastewater treatment facility stormwater discharges)
- **NPDES General 1200Z Industrial Stormwater Permit for Eugene Airport** (a permit issued to the City of Eugene for the stormwater discharges from the regional airport facility located outside of the Eugene UGB but operated by the City of Eugene)

These permits serve as the TMDL Implementation Plans for the discharges they cover, and the annual reports associated with each permit serve as the report of progress required for TMDL implementation, for the discharges they cover. Following is a summary of the frequency and timing of the reporting for each of these permits. For more explanation about the permits themselves, see the City’s TMDL Plan.

NPDES MS4 Permit #101244

The MS4 permit covers the discharges from the municipal stormwater system. The City received its first Phase I NPDES MS4 permit in 1994 and is currently in its third permit term, having been issued its most recent permit on December 30, 2010. At the time that the City submitted its original TMDL Plan (October 2008), the City was anticipating its third-term MS4 permit. Therefore, the TMDL Plan Implementation Matrix, Appendix A of the Plan, references the proposed SWMP best management practices (BMP) codes, descriptions, measurable goals and tracking measures reflected in the September 2008 MS4 permit renewal submittal. Some refinements to Eugene’s SWMP were made during the permit renewal process between October 2008 and April 2011. The April 2011 SWMP was approved by DEQ and the updates were reflected in Appendix A included with the Year 3 TMDL report. In December 2012, the SWMP was updated again, primarily to reflect changes in the organization of Eugene’s volunteer programs. The changes are administrative in nature and do not reflect substantive changes to the stormwater permit program, measurable goals, or tracking measures. The proposed changes were submitted to DEQ with the Year 2012 annual MS4 report, and are reflected in the TMDL Plan Implementation Matrix (Appendix A of this TMDL Sixth Annual Report).

The most recent annual MS4 report (Year 2014 Stormwater Annual Report), covering the reporting period from July 1, 2013 through June 30, 2014, was submitted to DEQ on December 1, 2014. The Year 2014 Annual Report includes the status of MS4 SWMP best management practices, water quality monitoring data analysis and trends including for Willamette River and Amazon Creek, and an evaluation of stormwater public education program effectiveness. A Supplement to the Year 2014 Stormwater Annual Report was also submitted on December 1, 2014. The supplemental report includes three reports documenting the following: TMDL pollutant load reduction evaluation; TMDL wasteload allocation attainment assessment, and 303(d) evaluation. The Year 2014 Stormwater Annual Report and Supplement to the Year 2014 Stormwater Annual Report are available on the City's web site at: <http://ci.eugene.or.us/>, and following links to: Services > Stormwater > Planning, Permits and Regulations > NPDES. At DEQ's request previously, this TMDL report simply references the Year 2014 Stormwater Annual Report (and Supplement) rather than include it within this document.

NPDES Wastewater Discharge Permit #102486 and NPDES General 1200-Z Industrial Stormwater Permit for WPCF sites

The Metropolitan Wastewater Management Commission (MWMC) and the cities of Eugene and Springfield hold a NPDES permit for the discharge of treated wastewater to the Willamette River from the Eugene-Springfield Water Pollution Control Facility (WPCF). The MWMC also holds a permit for stormwater discharges from the WPCF and related Biosolids Management Facility (BMF) site.

- A Discharge Monitoring Report (DMR) for the WPCF is submitted to DEQ monthly, by the 15th day of each month.
- A Pre-treatment Annual Report is submitted to DEQ each year by March 1, covering the entire previous calendar year.
- The 1200-Z report for the WPCF and BMF is completed by July 31st each year, and covers the previous fiscal year (July 1 through June 30).

NPDES General 1200-Z Industrial Stormwater Permit for Eugene Airport

The City of Eugene also holds a General 1200-Z permit for discharges of stormwater runoff from the Eugene Airport site to Amazon Creek and the A1 Channel, both of which eventually flow into the Long Tom River. The 1200-Z DMR for the Eugene Airport is completed each year, covering the previous fiscal year (July 1 through June 30).

Administration of NPDES 1200-Z and 1700-A General Permits

In addition to the point source permits held by the City of Eugene (and MWMC), the City currently acts as an agent for DEQ in the administration of 1200-Z (Industrial Stormwater) and 1700-A (Vehicle and Equipment Wash Water) General Permits inside the Eugene UGB³. Yearly reports are submitted to the DEQ via email as a Microsoft Excel database and industrial stormwater program activities are included in the Year Stormwater 2014 Annual Report.

³ The description of the City's responsibilities has been updated from the TMDL Plan, to indicate that the City administers the 1200-Z and 1700-A permits inside the Eugene UGB.

Administration of NPDES 1200-C General Permits

The City also currently acts as an agent for DEQ in the administration of 1200-C (Construction Activities) General Permits inside city limits and outside city limits, inside the Eugene UGB on behalf of Lane County under the City of Eugene/Lane County Stormwater Intergovernmental Agreement described in Section 2(e) of the TMDL Plan. The City's activities related to the erosion program are included in the Year 2014 Stormwater Annual Report.

c. Other Relevant Programs

This section provides information about the status and accomplishments of three other program areas or activities relevant to the TMDL, however indirectly: 1) Sustainability, 2) Low Impact Development, and 3) Climate and Energy.

Sustainability

Up-to-date information on the City's Sustainability Program can be found on the City's web site at: <http://www.eugene-or.gov>, and follow links to: Services > Sustainability. The Sustainability Commission produced its FY15 Workplan, covering the period of time from July 1, 2014 - 30, 2015 with primary topics to be addressed including: 1) continued engagement in the Envision Eugene process; 2) improving policy support for green business practices; 3) participating in the development of the Transportation System Plan and Pedestrian/Bicycle Master Plan, 4) advising City Council on the use of the Triple Bottom Line in staff analysis and council deliberations, 5) provide input and recommendations to the Budget Committee as it develops the FY15 budget, 6) investigate potential for revenue neutral carbon fee on greenhouse gas emissions, and 7) continue work on potential local food policy. The FY15 Sustainability Commission Workplan is available from the Sustainable Eugene web site, and is provided in this report for convenience as Appendix B.

Low Impact Development

Even though it is technically an element of the City's MS4 Permit program, significant progress was made in the area of low impact development which bears noting in this TMDL report. In 2013, staff continued to explore multiple avenues of opportunity to increase LID following Eugene City Council direction to do so in 2008, including administrative adjustments, additional integration of LID practices with other initiatives, development of proposals for land use code amendments, and development of proposals for other program enhancements. Most significantly, Eugene Code amendments modifying the City's stormwater development standards to prioritize LID practices over non-LID practices for new and re-development were placed before the Eugene City Council in January 2014. The Eugene City Council adopted the proposed code changes which went into effect on March 1, 2014.

In addition to changes to the City's regulations for new/re-development, the City entered into a three-year cooperative agreement with the Long Tom Watershed Council to work with private property owners to construct voluntary stormwater retrofits on developed commercial and industrial sites within the city of Eugene. Under the agreement, the City provides some limited funding to help match private investment in constructing voluntary retrofits and the LTWC seeks willing property owners and provides technical and logistical assistance.

Climate and Energy

The majority of recommendations contained in the Community Climate and Energy Action Plan, adopted by Eugene's City Council in 2010, continue to move forward. One example is that the City's Sustainability Office completed a research effort to better understand community attitudes about climate change and sustainable consumption. Next steps include using the research findings to develop an effective outreach and education campaign to ultimately reduce greenhouse gas emissions. Another example is bringing climate action and community visioning together in the Envision Eugene land use planning process by incorporating 20-minute neighborhoods and more compact, transportation-oriented development thereby reducing greenhouse gas emissions and fuel consumption. The Community Climate and Energy Action Plan 2013 Progress Report can be found on the City's web site: <http://www.eugene-or.gov>, and follow links to: Services > Sustainability > Sustainable City > Climate Change and Energy Use.

5. WATER QUALITY MONITORING

The City has conducted ambient and stormwater monitoring at several locations for over 15 years. The monitoring data, analysis and trend information are provided to DEQ annually as part of the MS4 permit reporting. For the latest assessment of water quality conditions through monitoring, see the Year 2014 Stormwater Annual Report, dated December 1, 2014 and available on the City's web site. Go to: <http://www.eugene-or.gov>, and follow links to: Services > Stormwater > Planning, Permit and Regulations > NPDES.

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Appendix A TMDL Implementation Matrix (December 2014)

TMDL Sixth Annual Report, Appendix A - City of Eugene TMDL Implementation Plan Matrix (Updated December 2014)							TMDL Pollutants Addressed ⁽²⁾					Water-shed ⁽³⁾		Regulatory Program(s) ⁽⁴⁾								
MS4 SWMP BMP ID (if applicable) ⁽¹⁾	BMP or Activity	Description of BMP or Activity	Measurable Goals & Timeline	Tracking Measures What is being tracked to show progress towards meeting measurable goals	Milestone Intermediate goals to know progress is being made	Progress Reporting Period (7-1-13 through 6-30-14)	Bacteria	Temperature	Hg	DO	Turbidity	Amazon	Willamette	NPDES MS4	NPDES 1200Z - WPCF	NPDES 1200Z - Airport	NPDES - Wastewater	WPCF UIC Permit	Goal 5	Goal 6	Willamette TMDLs	
WATERWAY PROTECTION, RESTORATION & SHADING																						
	Stream buffers/riparian protection	Consider adoption of an ordinance to establish setback buffers by means of a Water Quality Overlay Zone on waterways with a significant relationship to 303(d) listed streams, and which are not already protected by some other means (namely, Goal 5 and other protective zoning regulations).	/WQ Overlay Zone ordinance adopted and implemented (or alternative protections implemented) by June 2009.	• Applications involving /WQ Overlay Zone (New tracking measure, now that the adoption process is complete and the ordinance remains in effect).	The /WQ ordinance was adopted June 10, 2009 and remains in effect.	• Zero /WQ Overlay Zone-related land use applications were received during the reporting period. • Zero /WQ Overlay Zone adjustment applications were received during the reporting period.	√	√	√	√	√										X	X
	Stream buffers/riparian protection	Track and support the implementation of Goal 5 natural resource waterway protections.	Track implementation of /WR Overlay Zone	• Applications involving /WR Overlay Zone	NA	• Two /WR Overlay Zone-related land use applications were received during the reporting period. • Zero /WR Overlay Zone adjustment applications were received during the reporting period.	√	√	√	√	√								X			x
	Temperature trading feasibility	Explore options and partnership opportunities for ecosystem restoration to off-set temperature impacts, for example the regional wastewater treatment facility.	Identify follow up actions from March 2008 Preliminary Findings prepared by the Long Tom Watershed Council by June 2009.	• Document discussions and intermediate decisions	Discussions with City of Springfield by March 2009.	• This task has evolved into the Eugene-Springfield Metropolitan Wastewater Management Commission's contract, now in place, with The Freshwater Trust for a riparian shade project along Cedar Creek and the Springfield Mill Race to generate water quality trading credits, to help offset the regional wastewater facility's thermal load. For purposes of the City of Eugene's TMDL Implementation Plan, this task is complete.	P	√	P	P	P						X					x
	Enhance streamside shading, with an emphasis on Amazon Creek	Document existing planting plans and programs that relate to tree and shrub planting including: Amazon Creek plant community restoration plan (P3); tree planting code requirements; Neighborwoods; Stream Team (P1); Natural Resource Maintenance planting efforts (P4); Stormwater Management Manual (E4). Include in program adaptive management activities an evaluation of opportunities to enhance streamside shading.	Plant trees (goal=400/yr) along south and west side of Amazon Creek; Plant willow plantings (goal=4,000 lineal ft/year) of willow plantings along Amazon Creek	• Number/type of trees planted along Amazon Creek annually • Number of willow plantings along Amazon Creek annually • Number/type of trees planted along other waterways annually • Number of willow plantings along other waterways annually	NA	• Amazon Basin Streamside Shading Assessment was completed in March 2014 and the report is being utilized to inform planting within the Amazon Basin. • 402 trees planted along Amazon Creek. • 3,100 LF of willow planted along Amazon Creek; 7,000 LF of willow planted along the A3 Channel, a tributary to Amazon Creek. • 200 trees planted at Delta Ponds. • 400 LF of willow planted along Spring Creek, a tributary to the Willamette. • All trees listed above were a mixture of both native broad leaf species (approx 80%) and native conifers (approx 20%).	P	√	P	√	P			X								X
	TMDL web page	Develop TMDL web page, including links to related web sites, the City's TMDL Implementation Plan, and staff contact information.	Develop and populate web page by December 2008.	• Confirm web page information is current once/month	NA	• The City's TMDL Fifth Annual Report and Review, and the updated TMDL Implementation Plan (June 2014) are available on the City's revamped, more user friendly web site.	√	√	√	√	√											X

TMDL Sixth Annual Report, Appendix A - City of Eugene TMDL Implementation Plan Matrix (Updated December 2014)							TMDL Pollutants Addressed ⁽²⁾					Water-shed ⁽³⁾		Regulatory Program(s) ⁽⁴⁾								
MS4 SWMP BMP ID (if applicable) ⁽¹⁾	BMP or Activity	Description of BMP or Activity	Measurable Goals & Timeline	Tracking Measures What is being tracked to show progress towards meeting measurable goals	Milestone Intermediate goals to know progress is being made	Progress Reporting Period (7-1-13 through 6-30-14)	Bacteria	Temperature	Hg	DO	Turbidity	Amazon	Willamette	NPDES MS4	NPDES 1200Z - WPCF	NPDES 1200Z - Airport	NPDES - Wastewater	WPCF UIC Permit	Goal 5	Goal 6	Willamette TMDLs	
MERCURY REDUCTION STRATEGIES (NOT ASSOCIATED WITH EXISTING PERMITS)																						
	Dental Waste MOA	Participate in the implementation of activities as outlined in the 2006 Memorandum of Agreement (MOA) between the Oregon Dental Association (ODA), Metropolitan Wastewater Management Commission (MWMC), and the cities of Eugene and Springfield to limit the discharge of mercury and mercury bearing dental wastes into the regional wastewater collection system.	Provide services in the ten areas outlined in the MOA between ODA, MWMC and the cities of Eugene and Springfield.	• Track certifications of compliance with ODA BMPs, for dental offices in Eugene.	Monitor implementation of 2006 MOA ten specific services.	• A total of 29 dentists in 16 dental offices were inspected during the reporting period as to their compliance with the Dental Waste MOA.			√												X	
	School Cleanout Campaign	Participate in the School Cleanout campaign, led by Lane County with funding from DEQ, including (but not limited to) the disposal of chemicals and equipment containing mercury (barometers, manometers, thermometers).	Commence with efforts once intergovernmental agreement is signed by DEQ and Lane County. Timing of Clean Out campaign is dependent upon receipt of grant funding.	• Track quantities of chemicals and equipment identified for disposal.	Participate in stakeholder meeting to commence with Campaign by end of December 2008.	• School Cleanout Campaign not held during the report period.			√												X	
MUNICIPAL SEPARATE STORMWATER SEWER SYSTEM (MS4) NPDES PERMIT																						
Public Education																						
A1	Stormwater Education	Plan, develop, implement and revise as necessary a program to provide stormwater information and education to homeowners, school children, City and other agency staff and the general public about the impacts to stormwater quality and natural resource values from both point and non-point sources of pollution. In addition, educate professional, commercial, and industrial businesses about best management practices that can help prevent and reduce stormwater quality impacts to the public stormwater system and local receiving waters.	• Conduct surveys every two years with Eugene residents to determine attitudes and opinions of residents about the stormwater management program. • Provide SPLASH educational curriculum to teachers and administrators in local school districts. • Develop and implement internal stormwater education to city staff through new employee orientation, "green team" presentations, work group presentations and audio/visual presentation. • Increase catch basin markers with "dump no waste" messages and storm drain covers installed on public improvement projects. • Work collaboratively on education campaigns with other local agencies.	• Number of information materials (all media) prepared and distributed to the public. • Number of students and teachers who use SPLASH curriculum annually. • Number of attendees at public outreach events. • Number of employees attending stormwater education sessions. • Track quantity of installed catch basin markers and storm drain covers. • Identify collaborative campaigns, target audience and summary of campaign. • Documentation of stormwater survey responses.	Spring Stormwater Connections newsletter published by May each year; Fall Stormwater Connections newsletter published by November each year.	• See Year 2014 Stormwater Annual Report	√	√	√	√	√			X				X				x
P1	Educational Volunteer Program ⁽⁵⁾	Manage and support the City's Eugene Park Stewards volunteer program that promotes stormwater education. Provide opportunities to involve citizens of all ages and socio-economic backgrounds in meaningful, hands-on and educationally oriented stormwater related projects. Such projects are aimed at providing both physical benefits and participant awareness related to protecting stormwater quality, fostering citizen stewardship of the City's water resources, promoting the use of native-vegetation, and enhancing fish and wildlife habitat within the local urban watershed.	• As attrition occurs continue to recruit replacement adoption groups to maintain current levels of participation. • Conduct one volunteer work party annually that will address maintenance needs at publicly owned vegetated stormwater facilities with developed parks or the right of way. • On average, conduct 12 volunteer work parties per year. • Conduct at least one partnership based large-scale water resource clean-up or enhancement volunteer project per year. • Correspond with the city's stormwater education program coordinator on a regular basis to determine if there are opportunities to better inform the public regarding the challenges and benefits of stormwater management.	• Number of adoption groups that are retained and continue to participate in the volunteer program. Track number of new adoption groups brought into the program. • Number of volunteer work parties conducted that involve maintenance of publicly owned vegetated stormwater facilities and number of volunteer participants. • Number of work parties conducted and number of volunteer participants. • Document annual large-scale project(s), participating partners and number of volunteer participants. • Document annually efforts to educate the public about the city's volunteer programs and the protection of water quality as it relates to stormwater.	On-going program	• See Year 2014 Stormwater Annual Report	√	√	P	P	√			X								x

		TMDL Sixth Annual Report, Appendix A - City of Eugene TMDL Implementation Plan Matrix (Updated December 2014)					TMDL Pollutants Addressed ⁽²⁾					Water-shed ⁽³⁾		Regulatory Program(s) ⁽⁴⁾									
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Planning, Capital Improvements, and Data Management																							
E1	Stormwater Capital Improvement Projects	<p>Implement the Stormwater capital improvement program (CIP), including projects identified in the City's Stormwater Basin Master Plans (Basin Plans) for Amazon, Willow Creek, Bethel-Danebo, Willakenzie, Laurel Hill, and Willamette River and the River Road – Santa Clara basins.</p> <p>The Basin Plans describe a multiple-objective strategy for managing stormwater that addresses water quality protection and improvement, conveyance and flood control, and waterway protection and restoration. The basin strategies reflect the unique characteristics, problems and opportunities in each basin. Volume I contains a prioritized city-wide capital projects list including: water quality facilities in high pollutant source areas, streambank stabilization, stream restoration, and capacity enhancement projects.</p> <p>The Basin Plan capital projects are one of the main sources of capital projects that comprise the City's CIP. In addition to the Basin Plans, CIP projects also originate from a list of maintenance and rehabilitation needs, from focused planning studies such as the Metro Waterways Restoration Study, and other partnership opportunities. The prioritized Basin Plan capital projects are combined with projects from these other sources, re-ranked, and incorporated into the CIP in a timeframe in-line with available budget.</p>	<ul style="list-style-type: none"> Incorporate into the CIP projects list the projects identified in the recently completed 2010 River Road-Santa Clara Basin Plan, by September 2010. Implement Stormwater CIP projects including at least one "water quality facilities in high source areas" project over the five-year permit term, and other retrofits as opportunities arise. 	<ul style="list-style-type: none"> Document completion of River Road-Santa Clara Basin Plan. Track the number, type, watershed location and total drainage area of capital improvement projects constructed for water quality. 	Public draft RR-SC plan by October 2008.	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√	√	P	√	√			X				X			x		
E3	Stormwater System Mapping and Data Management	<p>Keep up-to-date inventories and maps of the public and private, natural and constructed, stormwater system. Include mapping of public and private water quality and flow control facilities such as grassy swales and detention basins. Develop and integrate asset inventory data and geographic information system (GIS) systems which describe the conveyance system, water quality attributes and related natural resource information. Integrate information generated through BMPs such as E1 (Capital Improvement Projects) and E4 (Development Standards) which create or modify system components and/or change the attributes of the stormwater system.</p>	<ul style="list-style-type: none"> Enter 95% of all newly constructed stormwater system features into inventory databases and GIS within six months of final construction approval. Ensure that 90% of GIS and data application users surveyed rate the GIS/data systems as satisfactory or better. 	<ul style="list-style-type: none"> Report on map and database update activities annually. Survey map and data system users bi-annually. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	Pollutants are not directly addressed by this BMP, but it is an essential support function for the other program activities							X					X				x

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P2	Bacteria Pilot Study	<p>Amazon Creek is water quality limited for bacteria and load reductions of 84% are necessary as specified in the 2006 Willamette Basin Bacteria TMDL.</p> <p>The Bacteria Pilot Study includes three phases: Phase I focuses on efforts to identify source(s) of bacteria, followed by Phase II which focuses on the application of Bacteria Pilot Study BMPs ("BMPs") aimed at reducing bacteria, and followed by Phase III which focuses on evaluating the effectiveness of BMPs that are implemented.</p> <p>Based on monitoring and site assessment work initiated with the 2005 Stormwater Management Plan the overall strategy for continuation of the Bacteria Pilot Study will be a more targeted approach that will narrow down the number of probable sources for investigation of the root of bacterial pollution within a selected study area. This more targeted approach will lead the City towards implementing Phase II and Phase III of the study.</p>	<ul style="list-style-type: none"> Collect and analyze stormwater samples within the study area during at least three (3) significant wet weather storm events per year for the duration of the permit cycle. Report on all field condition assessments completed during the permit year. Show how collected field data is used to confirm or eliminate bacteria sources. Initiate at least two (2) new BMPs by December 2011 that will either identify or rule out specific sources of bacterial contributions to the MS4 within the study area. Starting in July 2012, initiate at least one new BMP per year that will address identified specific sources of bacteria with the study area. Develop an electronic case history file by February 2011 that contains documentation of findings and results that can be utilized by staff to evaluate overall success of study. Report on results of stormwater sampling and analysis in association with implemented BMPs with emphasis on showing the effectiveness of the BMP selected. 	<ul style="list-style-type: none"> Track the number of sampling events, samples collected, and resulting bacteria analysis results. Track results of field condition assessments conducted and the corresponding outcome of the assessment. Attempt to correlate noted conditions with results of sampling analysis. Document additional strategies that will identify or rule out potential sources of bacteria. Report on any conclusions derived as a result of implementing these strategies. Document the use of alternative investigative approaches such as microbial source tracking and sediment sampling. Document all follow up sampling and analysis and conclusions derived regarding BMP effectiveness. Document all follow up sampling and analysis and conclusions derived regarding BMP effectiveness. 	<p>Document pre-BMP implementation observations and water quality data from Phase I of the study by October 08.</p>	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√																X
Construction and New Development																							
E2	Erosion Prevention and Construction Site Management Program	<p>Administer and monitor an Erosion Prevention and Construction Site Management Program in compliance with Eugene Code 6.625-6.645, preventing and mitigating pollutant and sediment discharges into the city's stormwater system due to construction activities and land disturbance.</p> <p><i>NOTE: Projects that disturb one or more acres or are located in a sensitive area must have a permit based on a construction site management plan (CSMP) which shows the measures to be taken to comply with the mandated outcomes. In addition, even smaller construction projects which do not require a permit must meet the objectives of the ordinance. All public improvement projects must include a CSMP.</i></p>	<ul style="list-style-type: none"> Conduct one inspection prior to the commencement of work for all erosion permitted sites. Inspect non-erosion-permitted sites at least twice during the life of the building/construction permit or as necessary to assure compliance with the program. Inspect permitted sites monthly or as necessary to assure compliance with the program. Conduct one annual erosion prevention training event. 	<ul style="list-style-type: none"> Number of compliance orders issued. Number of permits issued. Number of inspections. Number of training/outreach events. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√		√	√	√												X
E4	Stormwater Development Standards	<p>Administer and monitor a program that implements the city's Stormwater Development Standards, Eugene Code 9.6790-9.6796, Eugene Code 7.143 (3), and associated Stormwater Management Manual. The Stormwater Development Standards regulate the location, design, construction and maintenance of private and public stormwater facilities for flood control, water quality, and natural resource protection.</p>	<ul style="list-style-type: none"> Review stormwater management proposals at the land use and/or development permit stage (i.e. earliest level of review). Review and approve construction plans for stormwater management facilities for all development sites which create 1000 square feet or more impervious surface. Update Eugene's Stormwater Management Manual every two years or as needed to provide new information or practices for post-construction stormwater management. 	<ul style="list-style-type: none"> Number of private water quality facilities permitted with building permits. Number of land use applications reviewed. Number and type of public water quality facilities constructed. Number of training/outreach events held. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√	P	√	√	√												X

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							√	P	√	√	√			X				X					
P6	Compliance Program for Maintenance of Privately Owned Vegetated Stormwater Facilities	Develop, implement and manage a program to ensure that privately owned and operated vegetated stormwater treatment facilities are maintained so that they function as designed and constructed. The program will employ a combination of rules, protocols and procedures to require: that each private vegetated facility is routinely inspected; that routine and corrective maintenance actions are performed in a timely manner; and that completion of both such activities are regularly reported to City staff. Based on Eugene Municipal Code requirements, penalties and/or other legal remedies will be employed to enforce compliance with these requirements when necessary.	<ul style="list-style-type: none"> Inspect all new vegetated private stormwater facilities at the time of construction and log pertinent information into the stormwater facility tracking database system. Adopt and implement an administrative rule to enforce the maintenance of private stormwater facilities by February 2011. Ensure the inspection of each vegetated private stormwater facility is conducted at least once per year by the owner/operator and an inspection and maintenance log documenting the necessary corrective actions is submitted to City staff annually. Review annual reports for privately-owned vegetated stormwater facilities. 	<ul style="list-style-type: none"> Number of private vegetated stormwater facility inspections completed at time of construction. Number of owner/operator inspection and maintenance logs received and reviewed annually. Number of notices of non-compliance and subsequent enforcement. 	NA	• See Year 2014 Stormwater Annual Report	√	P	√	√	√			X				X					X
M6	Regulation of Inspection, Maintenance and Reporting of Private Underground Stormwater Structures	Develop, implement and manage a program to ensure that privately owned and operated underground stormwater treatment structures are properly maintained. The program will employ the guidance provided by the required individual Operations and Maintenance (O&M) plan for each structure.	<ul style="list-style-type: none"> Inspect all new private underground stormwater structures at the time of construction and log pertinent information into a database. Establish a correspondence file for each structure/operator. Ensure that each private underground stormwater structure is inspected, maintained and reported on as required by the O&M plan for the specific device. Review annual reports for privately-owned underground stormwater facilities. 	<ul style="list-style-type: none"> Track the number of O&M plans obtained. Track the number of private inspection, maintenance and reporting activities conducted. Track any enforcement activities related to the individual structures. 	NA	• See Year 2014 Stormwater Annual Report	√	P	√	√	√			X				X					X
Operations and Maintenance																							
M3	Street Sweeping Program and Leaf Pick-up	Undertake both mechanical brush and vacuum sweeping of publicly maintained roads, bike paths, and parking lots in accordance with the Stormwater Operations and Maintenance Manual. Monitor and evaluate new technology and methods related to street sweeping, and make appropriate adjustments to the current sweeping program when feasible to maximize water quality benefits.	<ul style="list-style-type: none"> Sweep downtown core twice per week. Sweep university and industrial areas once per week. Sweep arterial streets every 2 weeks. Sweep residential streets every 6-8 weeks. Sweep bike paths and improved alleys twice per year. Coordinate and manage two seasonal opportunities for the citizen's leaves to be picked up and managed by the SW operations crew. 	<ul style="list-style-type: none"> Lane miles swept. Amount of debris collected. Amount of leaves picked up. 	NA	• See Year 2014 Stormwater Annual Report	√		√	√	√			X									X
M4	Prevent Leaks and Spills from Municipal Vehicles and Equipment	Undertake preventive maintenance program for all municipal vehicles and equipment in order to prevent or correct sources of vehicle fluid leaks. Implement employee education practices and field operations procedures to detect and report leaks and to prevent incidences of fluid and material spills from municipal vehicles. Equip municipal trucks and large mechanized equipment with renewable spill response kits.	<ul style="list-style-type: none"> Include a spill procedure card in all City vehicles and equipment by December 1, 2011. Perform preventative maintenance service on all City vehicles and equipment annually, at a minimum. During the repair/clean-up process, analyze the type and cause of the spills associated with the repairs conducted by Fleet staff, and evaluate whether operator training maybe helpful with spill minimization. 	<ul style="list-style-type: none"> Track the number of spill procedure cards issued annually. Track the number of vehicle related leaks repaired annually. Track the percentage of vehicles which receive preventative maintenance service annually. 	NA	• See Year 2014 Stormwater Annual Report			√	√	√			X									X

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M5	Public Stormwater System Cleaning Programs - Piped System	Undertake frequent, systematic cleaning of the components of the public stormwater system such as catch basins, pipes, culverts, inlets, and stormwater quality devices in accordance with the adopted Stormwater Operations and Maintenance (O&M) Manual. Document quantities of material removed from each structure. Using the maintenance management system, refine the regular cleaning schedule for pipes, catch basins and stormwater quality devices. Research and monitor developments in maintenance technology and operations and maintenance methods for the closed systems which will further increase the effectiveness of our cleaning practices and water quality improvement practices.	<ul style="list-style-type: none"> Clean 50% of the all of the public catch basins and inlet structures annually unless increased efficiencies are shown through adaptive management. Clean all of the public underground stormwater quality structures as outlined in the Stormwater O&M Manual. 	<ul style="list-style-type: none"> Track the number of structures cleaned. Track the amount of debris recovered. Track the lineal footage of stormwater lines cleaned. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√	√	√	√			X					X				x	
M8	Winter Road Sanding and De-icing Program	Apply and clean up winter traction sand on publicly maintained roads and parking areas in conjunction with the application of a pre-wetting agent designed to reduce the need for repeat sanding. Conduct research efforts to identify and evaluate new technology and strategies for application of environmentally friendly chemical anti-icing and de-icing agents. Conduct research into new methods, practices, and efficiencies which may further limit the runoff of sanding related pollutants to the storm system. Conduct preseason staff training on the proper application methods of sand and chemical agents.	<ul style="list-style-type: none"> Minimize the use of abrasive materials for snow and ice control through adaptive management practices. Begin clean up of abrasive materials when streets become free of ice and snow, and the forecast does not call for more ice and snow within the next 24 hours. 	<ul style="list-style-type: none"> Document the quantities of sanding materials applied and collected during each storm event. Document the volume used for deicing/anti-icing operations. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 				√	√			X									x
P3	Tree Planting and Information Programs ⁽⁵⁾	Manage and support both governmental and community tree planting programs. Provide information to the public about the multiple benefits that trees provide for protecting an enhancing stormwater quality.	<ul style="list-style-type: none"> On average, conduct 12 Eugene Park Stewards volunteer program tree planting projects per year. Include the planting of street trees with all new private developments and with all new public street improvement projects as opportunities arise. Plant 600 trees per year through the Eugene Park Stewards program and the City's regulatory tree planting program. Provide information about the stormwater benefits of trees at major publicly attended events at least 4 times per year. 	<ul style="list-style-type: none"> Track the number of Eugene Park Stewards volunteer program planting projects and the resulting number of trees planted. Track the number of trees planted through new development tree planting requirements and through City-engineered street improvements. Track the number and type of publicly attended events where stormwater related tree information was provided or where a presentation was made. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√	√	√	√			X										x

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P4	Public Stormwater System Maintenance – Developed Parks and Rights-of-Way	Evaluate and, as necessary, adapt or revise turf, landscape and natural area vegetation management programs for public lands under the City's jurisdiction. Such areas include developed parkland and public right-of-way. The focus of this BMP is to minimize and further limit the discharge of pollutant laden runoff from these areas.	<ul style="list-style-type: none"> Review IPM manual at least once during the permit term, and update and refine the IPM policy document and operations manual in accordance with integrated pest management principles. Conduct periodic inspection of each publicly maintained vegetated stormwater management facility within the right-of-way and developed parks. Populate the stormwater facility tracking system database with current information for each facility that is inspected. Continue to provide services to existing Pesticide Free Parks. All newly developed playgrounds, pools, sprayplay features, recreational areas and other park areas will be evaluated during design or within one year of initial public use for addition into the Pesticide Free Zone program. 	<ul style="list-style-type: none"> Document updates of IPM policy document and operations manual. Document new techniques and practices that are incorporated into park and landscape design. Document the number of publicly maintained vegetated stormwater facilities inspected and information entered into the stormwater facility tracking system database annually. Track the condition of existing parks that are currently maintained using the Pesticide Free Parks protocol. Calculate the total acreage that has been placed in the Pesticide Free Zone Program per year. Utilize Chem Track program to track how much chemical (pound per acre) were used each year and determine total reduction of chemicals used annually. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√	√	√	√	√			X									x
P5	Public Stormwater System Maintenance – Open Waterways	Maintain and manage open waterways consistent with adopted Open Waterway Maintenance Plans. These plans are intended to protect and enhance stormwater quality and natural resources values while continuing to maintain sufficient conveyance capacity in the waterways.	<ul style="list-style-type: none"> Review IPM manual at least once during the permit term, and update and refine the IPM policy document and operations manual in accordance with integrated pest management principles. Conduct periodic inspection of each publicly maintained vegetated stormwater management facility within the right-of-way and developed parks. Populate the stormwater facility tracking system database with current information for each facility that is inspected. Continue to provide services to existing Pesticide Free Parks. All newly developed playgrounds, pools, sprayplay features, recreational areas and other park areas will be evaluated during design or within one year of initial public use for addition into the Pesticide Free Zone program. 	<ul style="list-style-type: none"> Document updates of IPM policy document and operations manual. Document new techniques and practices that are incorporated into park and landscape design. Document the number of publicly maintained vegetated stormwater facilities inspected and information entered into the stormwater facility tracking system database annually. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√	√	P	√	√			X									x
Illicit Discharge Controls																							
M1	Management of Illicit Discharges to the Municipal Stormwater System	Discourage and reduce improper discharges into the stormwater system through operation of a stormwater discharge compliance enforcement program. The primary goals of this program are to protect the quality of the receiving waters of the City's stormwater system and to ensure that discharges to the City's stormwater system are in compliance with local, state, and federal regulations to the maximum extent practicable. The City will conduct periodic review of enforcement program practices and procedures and make revisions as deemed necessary.	<ul style="list-style-type: none"> Work to reduce the number of improper discharges into the municipal stormwater system through public outreach and a reasonable enforcement of regulations. 	<ul style="list-style-type: none"> Track the number of stormwater pollution complaints received by the City. Track the number of outfalls inspected annually. Track the number of requests-for-service (RFS) related to illicit discharges to the municipal stormwater system which required enforcement. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	P	P	P	P	P			X				X					x

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M2	Spill Response	Maintain an on-call team trained in spill response procedures involving environmentally hazardous materials and a vehicle equipped for such spill mitigation. Coordinate efforts with other local response teams such as the City of Eugene Fire and Police Departments, Lane County, and state agencies.	<ul style="list-style-type: none"> Maintain a list of HAZWOPER trained personnel that are available for 24-hour emergency response. Maintain and update, as necessary, the City's On-Call Emergency Roster for Environmental Spills. 	<ul style="list-style-type: none"> Up-to-date list of employees trained for spill response. Track number of spills and follow-up details. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	P	P	P	P	P			X				X				x
M7	Systematic Stormwater Field Screening and Investigation	The Stormwater Field Screening and Investigation program inspects the public stormwater system for condition assessment and the private stormwater system to assess water quality impacts to the municipal stormwater system. Where illicit discharges are found, attempt to identify the source and eliminate the discharge.	<ul style="list-style-type: none"> Improve accuracy of the Stormwater System layer in our Geographic Information Systems (GIS) through map update requests. Identify and remove illicit discharges to the municipal stormwater system through the dry-weather field screening process. Utilize interaction with the public as an educational opportunity to increase stormwater user awareness. Develop "map update" requests based on field inspections and forward this information to the GIS manager for inclusion into the citywide GIS system. 	<ul style="list-style-type: none"> Track the number of map update requests forwarded to the GIS team. Track and create work orders for the system repairs discovered through the inspection process. Track the number of dry-weather field screening inspections and follow-up details. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 		√		P	P	√		X								x
P7	Litter and Illegal Dumping Control	Manage and support efforts to reduce impacts to stormwater runoff and local receiving waters by controlling litter and debris in public spaces and by removing illegally dumped refuse and debris as well as garbage and trash from illegal camp sites. There are two primary focal points of this BMP. The first is to provide opportunities for proper disposal of litter and trash at strategic publicly owned sites to prevent it from being washed into the public stormwater system. The second is to clean-up illegal dump sites and illegal camp sites prior to pollutants from the trash and debris being washed into the public storm system or the local receiving waters.	<ul style="list-style-type: none"> Ensure all parks, all public space areas managed by the City and all venues for outdoor public events on City lands have adequate trash receptacles. Empty trash receptacles frequently enough to prevent spillage due to being over filled. Ensure at least 75% of all rentals of parks, park shelters, and other City operated outdoor facilities will result in no loose litter and debris left behind. Inspect all major waterways and riverbanks weekly for dumped or discarded debris and illegal campsites. When found, remove dumped materials within two working days. When found, dismantle illegal campsites and clean-up as soon as is physically and legally possible. Monitor all identified historic dumping sites in the public right-of-way and clean-up as necessary at least twice per month. 	<ul style="list-style-type: none"> Track the collection frequency for trash receptacles in City parks and other public space areas managed by the City. Document the number or percentage of rentals of parks, park shelters, and other outdoor venues held on City managed land that forfeit all or part of their clean-up deposit due to excessive litter left behind. Track the number of illegal campsites cleaned-up along riverbanks, waterways, or other public space areas managed by the City. Track the frequency of collection and the amount of debris collected from waterways and from the public right-of-way. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√		P	P	√		X									x

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MS4 SWMP BMP ID (if applicable)⁽¹⁾	BMP or Activity	Description of BMP or Activity	Measurable Goals & Timeline	Tracking Measures What is being tracked to show progress towards meeting measurable goals	Milestone Intermediate goals to know progress is being made	Progress Reporting Period (7-1-13 through 6-30-14)	Bacteria	Temperature	Hg	DO	Turbidity	Amazon	Willamette	NPDES MS4	NPDES 1200Z - WPCF	NPDES 1200Z - Airport	NPDES - Wastewater	WPCF UIC Permit	Goal 5	Goal 6	Willamette TMDLs	
Waste Management																						
B1	Household Hazardous Waste Disposal	Support existing efforts and programs within the Eugene metro area to inform citizens of local opportunities for the proper discard and disposal of their household hazardous waste materials. Support and promote facilities and programs that provide such opportunities. The improper disposal of household hazardous waste poses a serious threat to local stormwater quality. Old paint, solvents and thinners, pesticides, bleach, drain cleaners, antifreeze, gasoline, used motor oil and other motor vehicle fluids can easily be flushed into the stormwater system if disposed of in yards, left uncovered in the rain, or poured down driveways or into the street. Supporting efforts to inform homeowners and tenants about where they can properly dispose of these products as well as supporting local household hazardous waste management facilities and efforts is an effective way to reduce the amount of these products that inadvertently make their way into the stormwater system and local receiving waters.	<ul style="list-style-type: none"> Work with Lane County and City of Springfield to annually update "Brown Pages" in the US Dex directory to include new electronics requirements. Update the City's web site periodically to direct residents to the latest information about recycling and waste prevention news, resources, and local events. 	<ul style="list-style-type: none"> Document completion of "Brown Pages" update. Document materials disbursed about household hazardous materials 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 			√	P				X							x	
B2	Solid Waste Management	Evaluate and revise, as necessary, existing solid waste and recycling collection rules to address stormwater quality. Improper and/or unregulated collection and recycling of solid waste has a serious potential for creating negative impacts to stormwater quality. High collection fees, infrequent or spotty collection service may lead to illegal dumping activity. Unregulated waste containers may be prone to leaking or spilling allowing pollutants to wash into the storm system. By continuing to monitor and evaluate local solid waste management collection efforts, the City will be better able to improve local regulations so that stormwater quality is taken into account.	<ul style="list-style-type: none"> Review Administrative Rule to ensure regulations are up to date and include requirements to support appropriate waste management and prevention. Contract with Oregon DEQ for a waste composition study. 	<ul style="list-style-type: none"> Document total tons of yard debris collected through the curbside program. Document the number of compost demonstration workshops and participants. Document number of enforcement cases related to inappropriate garbage handling. Compare waste composition study with the prior one. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	√		√	√	P			X								x
Industrial Controls																						
W1	Industrial Stormwater Management Program	Provides oversight of stormwater discharges and washing activities from industrial facilities, screening new businesses for those that may require NPDES Permits, conducting inspections and providing technical assistance to industries with NPDES Permits, and responding to spills at facilities with permits.	<ul style="list-style-type: none"> Conduct site inspections on 20% of permitted facilities annually. 	<ul style="list-style-type: none"> Percentage of permitted facilities inspected. Number of corrective action letters sent and follow up responses. Number of Action Plans prepared by permit registrants. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 	P		P	P	√			X								x

MS4 SWMP BMP ID (if applicable) ⁽¹⁾	BMP or Activity	TMDL Sixth Annual Report, Appendix A - City of Eugene TMDL Implementation Plan Matrix (Updated December 2014)					TMDL Pollutants Addressed ⁽²⁾					Water-shed ⁽³⁾		Regulatory Program(s) ⁽⁴⁾							
		Description of BMP or Activity	Measurable Goals & Timeline	Tracking Measures What is being tracked to show progress towards meeting measurable goals	Milestone Intermediate goals to know progress is being made	Progress Reporting Period (7-1-13 through 6-30-14)	Bacteria	Temperature	Hg	DO	Turbidity	Amazon	Willamette	NPDES MS4	NPDES 1200Z - WPCF	NPDES 1200Z - Airport	NPDES - Wastewater	WPCF UIC Permit	Goal 5	Goal 6	Willamette TMDLs
Monitoring & Reporting																					
E5	Permit Management & Reporting	Administration of the overall NPDES permit compliance effort, including permit renewals, annual reports, program evaluations and documentation of the City's adaptive management processes, and updates to the City's TMDL benchmark assessment.	<ul style="list-style-type: none"> Submit Annual Reports to DEQ, that summarize implementation of the requirements as described in the City's MS4 permit, Schedule B. Evaluate progress towards meeting TMDL pollution reduction benchmarks for each five year renewal submittal. Conduct public involvement within an appropriate time to meet legal requirements for the five year renewal submittals, and for on-going adaptive management as appropriate. 	<ul style="list-style-type: none"> Track public involvement events and number of people reached. Post Annual Reports on City's web site. 	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 															
	Stormwater & Receiving Water Quality Monitoring	Conduct stormwater and receiving water (ambient) monitoring in accordance with Monitoring Plan. Continue to update TMDL management strategies based upon new stormwater and ambient monitoring data.	Analyze and report results to DEQ	Submit Monitoring Report Annually	NA	<ul style="list-style-type: none"> See Year 2014 Stormwater Annual Report 							X								X
WATER POLLUTION CONTROL FACILITY (WPCF) NPDES WASTEWATER DISCHARGE PERMIT																					
		Meet WPCF NPDES permit effluent limits as they relate to TMDL pollutants	Meet permit effluent limits, as required under NPDES permit	on-going under existing permit; permit renewal in progress	NA	NA	√	√	√								X				x
		Conduct pretreatment program as required under WPCF NPDES permit	Meet permit requirements to track number of inspections and outcomes	on-going under existing permit; permit renewal in progress	NA	NA	√	√	√								X				x
		Prevent overflows, as required under WPCF NPDES permit	Document and report to DEQ overflow-related information (e.g. number of emergency overflows from pump stations and reason for overflow; number of plant upsets and reason), as required under WPCF NPDES permit.	on-going under existing permit; permit renewal in progress	NA	NA	√	√	√								X				x
		Conduct monitoring as required under WPCF NPDES permit	Number of samples taken and parameters analyzed; report results to DEQ	on-going under existing permit; permit renewal in progress	NA	NA											X				x
STORMWATER PERMIT (1200Z) FOR WASTEWATER TREATMENT PLANT																					
		Implement best management practices for wastewater treatment facility under its 1200Z, as they relate to TMDL pollutants.	As required under WPCF NPDES 1200Z permit	on-going	NA	NA	√			√			X								x
		Conduct annual stormwater pollution control training for wastewater treatment plant staff.	As required under WPCF NPDES 1200Z permit	on-going	NA	NA	√			√			X								x
		Conduct monitoring as required under WPCF's NPDES 1200Z permit as it relates to TMDL pollutants.	As required under WPCF NPDES 1200Z permit	on-going	NA	NA							X								x
STORMWATER PERMIT (1200Z) FOR EUGENE AIRPORT																					
		Implement best management practices for Eugene Airport as required under its NPDES 1200Z permit, as they relate to TMDL pollutants.	As required under Airports' NPDES 1200Z permit	on-going	NA	NA	√			√	por.			X							x
		Conduct annual stormwater pollution control training for airport employees.	As required under Airports' NPDES 1200Z permit	on-going	NA	NA	√			√	por.			X							x

TMDL Sixth Annual Report, Appendix A - City of Eugene TMDL Implementation Plan Matrix (Updated December 2014)							TMDL Pollutants Addressed ⁽²⁾					Water-shed ⁽³⁾		Regulatory Program(s) ⁽⁴⁾											
MS4 SWMP BMP ID (if applicable) ⁽¹⁾	BMP or Activity	Description of BMP or Activity	Measurable Goals & Timeline	Tracking Measures What is being tracked to show progress towards meeting measurable goals	Milestone Intermediate goals to know progress is being made	Progress Reporting Period (7-1-13 through 6-30-14)	Bacteria	Temperature	Hg	DO	Turbidity	Amazon	Willamette	NPDES MS4	NPDES 1200Z - WPCF	NPDES 1200Z - Airport	NPDES - Wastewater	WPCF UIC Permit	Goal 5	Goal 6	Willamette TMDLs				
		Conduct monitoring as required under Eugene Airports' NPDES 1200Z permit as it relates to TMDL pollutants	As required under Airports' NPDES 1200Z permit	on-going	NA	NA						por.			X							x			
⁽¹⁾ MS4 SWMP BMP ID" refers to the MS4 Stormwater Management Plan best management practice identification number as shown in the City's approve SWMP, dated April 2011, and updated December 2012.																									
⁽²⁾ √ = Clearly addresses pollutant; P = Possibly addresses pollutant																									
⁽³⁾ Shading indicates that BMP/Program applies within the watershed; no shading indicates that it does not apply within the watershed																									
⁽⁴⁾ X = the TMDL is the primary driver for the management strategy; x = another permit or program is the primary driver, however the strategy addresses one or more TMDL pollutants.																									
⁽⁵⁾ Description for BMP P1 and P3 updated December 2012 to reference consolidated volunteer program "Eugene Park Stewards," which incorporates the program previously called "Neighborhoods." No substantive changes to BMP tasks, measurable goals, or tracking measures.																									

TMDL SIXTH ANNUAL REPORT

Appendix B **Sustainability Commission FY15 Workplan**

EUGENE SUSTAINABILITY COMMISSION FY 15 WORK PLAN

October 2014

Introduction

The FY 15 work plan reflects a refined set of priorities that will enable the commission to focus its efforts with greater attention and coordination. These priority topics include:

- Envision Eugene
- Carbon pricing and climate mitigation
- Transportation System Plan/Bicycle and Pedestrian Master Plan
- Climate adaption and preparedness
- Sustainable Economic Development

Sustainability efforts by their nature call for an integrated approach that addresses the complex interactions and connections between many of the City's planning activities. This is reflected in the planned activities of the commission that emphasize the important links between land use, transportation, local economy and climate action. Several high-level policy initiatives are moving forward in tandem, including Envision Eugene, Transportation System Plan, Scenario Planning and the Climate Recovery Ordinance, and the commission will seek to advise Council on how best to integrate them to advance community sustainability goals.

As the commission advances the work detailed in the attached work plan, it will be important to maintain flexibility to take up new or revised priorities. Some issues may take on greater significance as opportunities and needs emerge at the local, state or federal level. The commission will work with Council to adjust its course as necessary to address these emerging priorities.

In formulating this year's priorities and activities, the commission relied on several overarching goals that inform their work and define success, including:

- Promote aspects of sustainability within the three areas of the Triple Bottom Line.
- Provide relevant, timely information to City Council.
- Have more organizations within the community working on sustainability in an intentional way.
- Have a mechanism for climate adaptation/mitigation work at County and regional levels.
- Maintain alignment with commitments the City of Eugene has made around sustainability.

Matrix

The matrix on the next page(s) includes the primary topics the commission plans to address in the coming year along with specific activities for advancing the commission's goals in these areas.

Sustainability Commission FY 15 Work Plan

Topic	Topic description	Outcomes	Planned activities	Timeline
<p>Envision Eugene</p>	<p>Review and provide input on Envision Eugene implementation.</p>	<ol style="list-style-type: none"> 1. Provide Envision Eugene context to Council, Mayor, and City Manager on key decisions and actions, particularly as they relate to Pillars 3 (<i>Plan for Climate Change and Energy Resiliency</i>) and 7 (<i>Provide for adaptable, flexible, and collaborative implementation</i>) 2. Support Council, Mayor and City Manager in decisions and actions that are consistent with the 7 pillars of Envision Eugene 	<ol style="list-style-type: none"> 1.1 Schedule presentation by City Planning Director (staff) to committee to share forecast of upcoming decisions and actions related to Envision Eugene implementation. 1.2 Meet frequently with Council, Mayor, and City Manager to identify relevant decisions and actions, keep track of schedule of when these items will be brought before Council. 1.3 Outreach to local stakeholder organizations 1.4 Attend and/or review minutes of meetings either about Envision Eugene or about topics for which Envision Eugene Pillars are relevant, and use the information gained to shape committee's work. 1.5 Prepare talking points on decisions and actions as they arise. 1.6 Explore benefits and structure of coordinating with the Planning Commission on Envision Eugene-related topics, which may include transit-oriented corridors, transportation, or other topics 2.1 Communicate (at Council's direction) with local stakeholder organizations 2.2 Recommend ways to mitigate impacts of Envision Eugene implementation, particularly as they relate to Pillars 3 and 7 	<ol style="list-style-type: none"> 1.1 By Nov 15, 2014. 1.2 Ongoing – minimum of six times per committee member in FY 15. 1.3 Ongoing – minimum of three per committee member in FY 15. 1.4 As needed. 1.5 Ongoing – minimum of three in FY 15, with timing determined by 1a, 1b, 1c, and 1d activities. 1.6 As appropriate. 2.1 As directed by Council 2.2 As appropriate
<p>Carbon Fee/Climate Recovery Ordinance</p>	<p>Provide input and recommendations on several climate change related initiatives including 1) carbon fee study to be completed for Oregon Legislature, 2) implementation of Climate Recovery Ordinance (CRO), and 3) local carbon offset program for meeting CRO reduction targets.</p>	<ol style="list-style-type: none"> 1. Evaluate the finding of the statewide carbon fee study and prepare recommendations for Eugene City Council consideration. 2. Provide assistance to City staff on implementation of the CRO metrics integrated with Envision 	<ol style="list-style-type: none"> 1.1 Review the draft Carbon Fee Assessment Study (required by SB 306) being prepared by Portland State University. Assess underlying assumptions and how they relate to Eugene's CRO. 1.2 Meet with Oregon Legislators to discuss SB306's finding and recommendations and future legislation. Discuss the Assessment report with other organizations as part of the evaluation process. 1.3 Develop recommendations for Commission review/approval. Submit Commission recommendations to the City Council for consideration. 2.1 Collaborate with City staff in their development of CRO implementation 	<ol style="list-style-type: none"> 1.1 The draft Assessment report will be issued by December 1, 2014. Evaluation of the report will be completed by mid-January with recommendations prepared for Commission review/approval. Recommendations will be forwarded to the City Council and Manager for their review and consideration. 2.1 Work with City staff on the schedule.

Sustainability Commission FY 15 Work Plan

Topic	Topic description	Outcomes	Planned activities	Timeline
		<p>Eugene Pillar 7.</p> <p>3. Preparation of a verifiable local Carbon Offset Assessment linked to the CRO for consideration by the Commission. As stated in the CRO, if year 2020 goals are not met, it may be necessary to fund verifiable local GHG reductions projects and programs or purchase carbon offsets for any remaining GHG emissions. This assessment could provide the City of Eugene information that may be needed to implement and comply with the CRO.</p>	<p>strategies. Provide feedback to City staff on potential implementation approaches/ strategies.</p> <p>3.1 Continue discussions with Oregon Leadership in Sustainability (OLIS) faculty on the scope of the assessment, purpose, and need. Emphasize this assessment is a critical element of Eugene's CRO.</p>	<p>3.1 Work with the OLIS program to establish the schedule. The goal is for OLIS to complete a draft report by spring 2015.</p>
<p>Transportation System Plan (TSP) and Pedestrian/Bicycle Master Plan (PBMP)</p>	<p>Participate in adoption of a Transportation System Plan (both policies and project list).</p>	<p>1. Work to ensure the adopted TSP supports the pillars of Envision Eugene (compact urban development, efficient transportation options, planning for climate change) and the Climate Recovery Ordinance by reducing dependence on single-occupant automobiles and increasing reliance on active transportation.</p> <p>2. Support adoption of the goals of the Pedestrian/Bicycle Master Plan (PBMP) as part of the TSP, and prioritizing funds for its implementation.</p> <p>3. Support a Complete Streets Policy for Eugene that commits to requiring that all transportation projects be evaluated to assure they serve people traveling by all modes.</p>	<p>1. Participate in development of the TSP as members of the Transportation Community Resource Group (TCRG), and report back to Sustainability Commission</p> <p>2. Advocate for a Complete Streets Policy, and provide examples and recommendations for staff and Council to consider in creating a Complete Streets policy.</p> <p>3. Continually emphasize to staff and Council that the pillars of Envision Eugene depend on transportation infrastructure that supports 20-Minute Neighborhoods, active transportation and reduced fossil fuel use.</p> <p>4. Focus on promoting solutions to Belt Line safety issues that are consistent with TSP policy priorities, funding realities, and the climate effects of both construction and use of Belt Line.</p> <p>5. Collaborate with Bicycle Pedestrian Advisory Committee (BPAC) to prioritize bike/pedestrian projects and policies that will have the biggest impact in promoting active transportation choices and support integration of the PBMP into the TSP.</p> <p>6. Monitor implementation of the trial of</p>	<p>1. Next TCRG meeting October 2014 and thereafter as scheduled.</p> <p>2. Speak to Council about a Complete Street policy at public forum (Oct 13) before TSP Work Session (Oct 22), and repeatedly thereafter, especially in Commissioners' one-on-one meetings with Council/Mayor/Manager.</p> <p>3. Ongoing in conversations with Council members, and as advised by the commission's Envision Eugene sub-committee.</p> <p>4. As input at TCRG meetings (see #1 above), in one-on-one discussions with Council members, and at any public input opportunities around Belt Line options. Consider meeting with staff to clarify timeline for Belt Line Improvement plans.</p> <p>5. Ongoing monthly BPAC meetings, informal contacts with BPAC members, and TCRG meetings.</p> <p>6. Ongoing, with implementation of Alternative 3 planned for spring, 2015.</p>

Sustainability Commission FY 15 Work Plan

Topic	Topic description	Outcomes	Planned activities	Timeline
			Alternative Three on Willamette Street, and the collection of data to evaluate its results. 7. Support City efforts to obtain outside funding for projects that reduce reliance on automobiles and enhance active transportation.	7. As requested.
Adaptation Planning	Provide input and recommendations on local planning efforts for climate change preparation and adaptation.	1. Assist in communication of adaptation planning efforts that can inform the City of Eugene's active involvement in risk reduction. Offer co-benefits (e.g., economic development, greenhouse gas reductions, etc.) that complement established efforts as part of the Climate Recovery Ordinance and Envision Eugene's Pillar 7.	1.1 Meet periodically with Council, Mayor, and City Manager to communicate opportunities for co-benefits to projects (i.e., risk reduction, energy independence, economic development, Climate Recovery Ordinance and GHG reductions, etc.). 1.2 Review the Hazard Mitigation report being prepared by City of Eugene and City of Springfield and identify opportunities to connect this project to community priorities and projects currently under development (e.g., City Hall building, EWEB watershed and water quality programs, LTD EMX extensions). 1.3 Meet with City staff following completion of the hazard mitigation plan and assist in identification and communication of potential adaptation implementation strategies. 1.4 Prepare talking points on decisions and actions as they arise. 1.5 Support and extend collaboration with inter-jurisdictional climate adaption efforts.	1.1 Ongoing – minimum of six times per sub-committee member in FY 15. 1.2 Evaluate the report and assess how it may be applied to projects currently under development. 1.3 Work with City staff on the schedule. 1.4 As needed. 1.5 On-going.
Sustainable Economic Development	Promote the concept of Sustainable Economic Development between the City and businesses within Eugene and surrounding areas.	1. Provide Envision Eugene context to Council, Mayor, and City Manager on key decisions and actions 2. Review of Sustainable Business Initiative (SBI) 3. Address Food and Economic Development relationship	1.1 Review and assess the relevance of TBL policy tools for evaluating economic development plans and projects. 1.2 Have discussions and meetings to share our valuation with the City. 1.3 Compare against CEAP (Climate Energy Action Plan) and the Regional Prosperity Economic Development Plan. 2.1 Review the SBI and identify the successes and identify action items yet to be addressed. 2.2 Evaluate opportunities for implementing CEAP and Envision Eugene through collaboration with Eugene businesses. 2.3 Create a plan to develop a new SBI that reflects current opportunities and challenges.	1.1 As appropriate 1.2 As appropriate 1.3 As appropriate 2.1 End of Q4 2014 2.2 End of Q4 2014 2.3 End of Q2 of 2015 3.1 As appropriate

Sustainability Commission FY 15 Work Plan

Topic	Topic description	Outcomes	Planned activities	Timeline
			<p>3.1 Conduct updated Sustainability Commission food environment assessment process (following on commission work of spring 2012) to include more emphasis on economic players in strengthening job creation (e.g. farm bureau, large processors).</p> <p>3.2 Advocate with City Council for the creation of a regional Food Task Force and be involved in its deliberations.</p>	<p>3.2 As directed by Council.</p>