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## Director's Report for February 2026

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**Meeting Date: March 12, 2026**  
**Department: Director's Office**  
[lrapa-or.gov](http://lrapa-or.gov)

**Agenda Item No.10**  
**Staff Contact: Travis Knudsen**  
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### I. EXECUTIVE HIGHLIGHTS

*Key accomplishments, challenges, and priorities from the past month.*

#### EXECUTIVE SUMMARY

February brought continued favorable air quality across Lane County, with monitoring stations recording predominantly "Good" and "Moderate" conditions. The spring outdoor burning season officially reopened on March 1 for Eugene, Springfield, and Oakridge, and LRAPA issued a press release reminding residents of the rules and alternatives to burning.

LRAPA hosted the Oakridge Air semi-annual partner meeting on February 26, highlighting strong outcomes from the Targeted Airshed Grant program. Roughly 7% of all households and 12% of single-family homes in the city have received upgrades estimated to reduce annual PM2.5 emissions by 4.56 tons while lowering energy costs for participating households.

In early March, LRAPA became aware that the Oregon Department of Forestry and DEQ had developed a new statewide outdoor burning tool called Before You Burn ([beforeyouburn.net](http://beforeyouburn.net)) without direct coordination with LRAPA. Because LRAPA has independent authority over outdoor burning curtailment in Lane County under Title 47, ensuring the tool accurately reflects our curtailment status is critical to avoid confusing residents and creating compliance issues. Staff arranged a meeting with ODF, DEQ, and the site developer on March 5 to discuss integration. For the March 6 public launch, Lane County zones on the site direct residents to contact LRAPA directly. Staff are now working with ODF to provide GIS data so the tool can properly reflect our burning zones going forward. Board members who receive questions about this tool should direct the public to LRAPA's daily burn advisory as the authoritative source for Lane County.

LRAPA participated in a CIS Best Practices audit on February 24, the agency's first since 2019-2020, assessing risk management practices across governance, personnel, fleet, contracts, and operations. Staff demonstrated strong practices and meaningful progress on formalizing the administrative infrastructure built over the past year. CIS has indicated that liability premiums will decrease slightly and property rates are expected to drop 10 to 12 percent at renewal.

Staff developed five new SOPs in January and February covering workers' compensation and return-to-work procedures, emergency action and continuity of operations, driving eligibility, a driving acceptability matrix, and supporting incident reporting forms. These policies were developed in part to support the CIS audit and reflect continued investment in building a strong operational foundation.

Following Board direction on audit services, LRAPA received proposals from two of the ten firms solicited and is currently evaluating them against the RFQ criteria. An update will be presented at a future meeting.

Spending remains below target across all funds at 40% of budgeted annual expenditures through January, and financial reserves continue to support four months of operating budget as targeted.

## II. PROTECTING PUBLIC HEALTH & SERVING OUR COMMUNITY

Aligns with Customer/Stakeholder Perspective of the Balanced Scorecard framework and LRAPA's current goals 1, 2, and 5 which focus on public health protection, community engagement, and stakeholder relationships.

### II.A. Air Quality Status & Trends for February 2026

These metrics support **Goal 1 (Public Health Protection and Air Quality Education)** and **Goal 4 (Regional Air Monitoring and Analysis)**, tracking our performance against targets for "Good" and "Moderate" AQI days, data completeness, and timely reporting).

#### February

Site	Date	Max AQI	Pollutant
Eug/Spfld	4-Feb-26	66	PM
Oak	7-Feb-26	74	PM
CottGrv	7-Feb-26	64	PM

AQI	Eug/Spfld	Oak	CottGrv	AQI Range	PM2.5 Range, ug/m3	Ozone Range, ppb
Good	21	18	19	0-50	0-9	0-54
Moderate	7	10	9	51-100	9.1-35.4	55-70
USG	0	0	0	101-150	35.5-55.4	71-85
Unhealthy	0	0	0	151-200	55.5-125.4	86-105
Very Unhealthy	0	0	0	201-300	125.5-225.4	106-200
Hazardous	0	0	0	301+	225.5+	201+

**Attachment No. 1:** Air Quality Index (AQI) charts for Lane County (February 2026)

**Attachment No. 2:** PM2.5 index charts for Lane County (February 2026)

## II.B. Community Response & Complaint Resolution

This section supports **Goal 1 (Public Health Protection and Air Quality Education)** metrics for complaint response to demonstrates our commitment to addressing community concerns promptly and effectively.

The number of unique complainants is noted in “(#)”

February 28, 2026
<b>Smoke complaints: 39</b>
31 - Outdoor Burning (29) 8 - Home Wood Heating (7)
<b>Industry: 3</b>
1 - Bakelite Chemicals LLC 1 - International Paper 1 - A & M Autobody Collision Repair Center
<b>Asbestos: 1</b>
<b>Miscellaneous: 6</b>
4 - Unknown Odor (3) 1 - Burning Industrial Engines 1 - Vehicle Emissions
<b>Total: 49</b>

Category	2021	2022	2023	2024	2025	2026
Dust	26	12	7	8	17	4
Ag Burning/spraying	7	2	3	3	22	0
General Air Quality	8	1	25	32	30	3
Home Wood Heating	57	67	52	39	70	14
Industry	336	198	97	75	108	14
Outdoor Burning	243	292	254	253	266	48
Slash Burning	10	6	12	9	3	0
Asbestos	9	22	10	12	21	9
Miscellaneous	31	80	62	91	95	8
Unknown	71	45	65	79	136	15
<b>Total:</b>	<b>798</b>	<b>725</b>	<b>587</b>	<b>601</b>	<b>768</b>	<b>115</b>

\*Notes: LRAPA received 49 complaints in February 2026. Smoke-related complaints increased from 23 in January to 39 in February, primarily driven by outdoor burning (31) and home wood heating (8). Industry complaints decreased from 11 to 3.

## II.C. Smoke Management & Wildfire Resilience

This section aligns with **Goal 2 (Enhanced Wildfire Smoke Preparedness)**, tracking our smoke monitoring, advisory issuance, and coordination with state agencies, as well as smoke management activities for outdoor burning and home wood heating.

### Outdoor Burning, 2025-2026 Season

LRAPA regulates outdoor burning in Lane County to protect air quality and public health. Under Title 47, LRAPA has authority to regulate open burning practices, including determining when burns can occur. LRAPA aims to allow burning whenever possible while preventing air quality deterioration. Outdoor burning is only curtailed when monitoring or forecasts show potential for unhealthy air quality impacts.

#### Periods of Curtailment

Start	End	Areas	Curtailment	Reason
Nov. 1, 2025	Mar. 1, 2026	Eugene/Springfield UGB; Oakridge	Full Prohibition	By Rule, Title 47-015(2)
Dec. 30, 2025	Jan. 1, 2026	All Lane County	Full Prohibition	Air Stagnation

### Home Wood Heating, 2025-2026 Season

LRAPA regulates home wood heating under Title 16 to reduce PM2.5 emissions during periods of poor air quality. An advisory system (Yellow/Red Days) indicates when curtailment is needed. Yellow Day advisory request voluntary curtailment of wood burning except for those who depend on it as their primary heat source. Red Day advisories prohibit visible smoke from chimneys, with exemptions for economic hardship. Like outdoor burning, LRAPA only issues wood burning curtailment when air quality monitoring or forecasts indicate potential health impacts.

### Periods of Curtailment

Areas	Yellow Days	Red Days
Eugene/Springfield	17	0
Oakridge	11	0

The home wood heating season, which is closed during the summer months, officially reopened on October 1st. No curtailment days have been needed this season as air quality conditions remain favorable since October.

### Outdoor Burning Letter Permits, 2025-2026 Season

LRAPA has authority to issue outdoor burning letter permits under Title 47. These permits allow specified burning that would otherwise be prohibited. This program also supports ecological benefits of prescribed fire while protecting public health through strict oversight and timing. LRAPA coordinates closely with land managers to ensure burns are conducted with minimal air quality impacts.

Permit No.	Issue Date	Permittee	Location	Material	Volume
20B25-06-01	June 30, 2025	River to Ridges Partnership	85 units in Lane County	Ecological Burning	1456 acres
20B25-11-01	November 17, 2025	Casey Jones	82578 Sprague Ln	Dexter	50 cubic yards
20B25-11-02	November 17, 2025	U.S. Fish & Wildlife	Hwy 36 & Alvadore Road	Ecological Burning	28 cubic yards
20B25-12-01	December 2, 2025	Scott Gielish	32960 Dillard Rd	Land-clearing	60 cubic yards
20B25-12-02	December 2, 2025	Scott Gielish	T18S R3W sec. 33 Next door to 32960 Dillard Rd	Forest type debris	500 cubic yards
20B25-12-03	January 5, 2026	Willamalane Park & Rec District	205 Dorris Street, Springfield	Land-clearing	30 cubic yards
20B25-12-04	January 5, 2026	Port of Siuslaw	Map & Taxlot # 18-11-19-00- 0011-00 (Rose Hill Rd), Florence	Land-clearing & demolition debris	69 cubic yards
20B26-01-02	January 26, 2026	Robbie Garcia	85393 Glenada Road	Land-clearing	60 cubic yards

### Wildfire Smoke Intrusions & Air Quality Advisories

LRAPA participates in Oregon's Wildfire Response Protocol for Severe Smoke Episodes, a coordinated system that connects federal, state, and local agencies during significant smoke events. LRAPA's role includes issuing local air quality advisories, coordinating public health messaging, and representing Lane County's interests in state-level response planning.

### Air Quality Advisories Issued

Start Date	End Date	Areas Affected	Primary Pollutant
08-22-2025	08-25-2025	Southern Willamette Valley	Ozone
09-02-2025	09-07-2025	Eastern Lane County	PM2.5/Wildfire
09-29-2025	09-30-2025	W. Lane County & Intermittent Eug/Spring	PM2.5/Wildfire

### Oregon Wildfire Response Protocol for Severe Smoke Episodes Meetings

Date	Topic	Advisory Issued
07-11-2025	Prep for Coordination Calls	n/a
07-16-2025	Review Active Wildfires	No
08-22-2025	Ozone & Flat Fire	Yes
08-25-2025	Flat Fire, Emigrant Fire, & OR Fires	No
08-27-2025	Emigrant Fire, Flat Fire, & OR Fires	No
09-02-2025	Emigrant Fire & OR Fires	Yes
09-04-2025	Emigrant Fire & OR Fires	Yes
09-05-2025	Emigrant Fire & OR Fires	Yes
09-29-2025	Moon Complex Fire & Emigrant Fire	Yes

## II.D. Community Outreach, Education, & Building Partnerships

This section supports **Goal 5 (Partnerships and Interagency Coordination)** metrics for partner engagement and stakeholder communication, strengthening relationships with stakeholders and enhancing public understanding of air quality issues.

### Media Log

Date	Media	Reporter	Topic
1-5-2026	Register Guard	Alan Torres	Amazon purchases \$2M lot for e-commerce <a href="#">LINK</a>
1-6-2026	Lookout	Michael Zhang	Deed shows land owned by Amazon <a href="#">LINK</a>
1-7-2026	DJC Oregon	Alan Torres	Amazon purchases \$2M lot <a href="#">LINK</a>
1-9-2026	KEZI	News Staff	Air stagnation & Yellow HWH <a href="#">LINK</a>
1-9-2026	KLCC	News Staff	Air stagnation & Yellow HWH <a href="#">LINK</a>
1-13-2026	Prism News	Elena Rodriguez	Air stagnation & Yellow HWH <a href="#">LINK</a>
1-16-2026	Register Guard	Alan Torres	Freezing Temps and AQ <a href="#">LINK</a>
2-4-2026	Lookout	Ashli Blow	Tear-gas effects on Air Quality <a href="#">LINK</a>
2-20-2026	Register Guard	Alan Torres	Eugene weighs 2 versions of industrial health standards <a href="#">LINK</a>

### **Oregon Particulate Matter Coordinators Meeting** (Feb. 24<sup>th</sup>, Online)

Travis Knudsen, Executive Director, and Matt Sorensen, Public Affairs Manager attended this annual two-day meeting hosted by DEQ, which brings together Oregon particulate matter professionals for project sharing, peer learning, and collaboration. There were updates from the EPA, DEQ regarding legislative activity in Salem, OSU research on PM health impacts, indoor air quality and prescribed fire smoke, DEQ’s PM monitoring program, OSU’s woodstove testing, and Portland’s Clean Air Construction program.

### **Share the Air Newsletter** (Feb. 25<sup>th</sup>, Online)

LRAPA’s first quarterly newsletter of 2026 focused on the most recent EPA National Emissions Inventory (NEI), breaking down the sources behind Lane County’s air emissions with an accompanying visual handout. Additional highlights included a recap of 2025 air quality and wildfire impacts, and reminders about asbestos testing requirements before construction projects and the upcoming LRAPA title 43 asbestos rulemaking process.

### **Oakridge Air Semi-Annual Meeting** (Feb. 26<sup>th</sup>, LRAPA Office)

LRAPA hosted the semi-annual meeting bringing together South Willamette Solutions, Oakridge city staff and residents, Oregon Health Authority, Lane County, and other stakeholders to review progress under the Oakridge Air Targeted Airshed Grant project.

The meeting highlighted strong program outcomes: 104 Oakridge homes received full upgrades, including wood stove replacements, ductless heat pump installations, and weatherization. This represents roughly 7% of all households and 12% of single-family homes in the city. The upgrades are estimated to reduce annual PM2.5 emissions by 4.56 tons while also lowering household energy costs and improving safety, comfort, and heating reliability. The program

additionally supported local contractors and workforce development, keeping federal investment circulating within the community.

**Spring Outdoor Burning Season Begins March 1<sup>st</sup>** (Mar. 1<sup>st</sup>, Lane County)

LRAPA issued a press release reminding residents in the Eugene UGB, Springfield and its UGB, and Oakridge that outdoor yard debris burning is permitted beginning March 1 under their respective city ordinances. The release also highlighted alternatives to burning, best practices for those who do burn, and the importance of checking the daily burn advisory before starting their fire.

**Before You Burn (BYB) ODF & DEQ Partnership Meeting** (Mar. 5<sup>th</sup>, Online)

Travis Knudsen, Executive Director, and Matt Sorensen, Public Affairs Manager, met with leadership from the Oregon Department of Forestry and the Oregon Department of Environmental Quality to discuss ODF’s new Before You Burn website ([beforeyouburn.net](http://beforeyouburn.net)) and resources developed for the public. The conversation focused on ensuring LRAPA, local fire districts, and residents across the state can use the site to get clear, consistent information about outdoor burning rules and locate their local fire district.

**Lane County Community Wildfire Protection Plan (CWPP) Workshop #2** (Mar. 10<sup>th</sup>, Bob Keefer Center)

Matt Sorensen, Public Affairs Manager, represented LRAPA at the second Lane County CWPP workshop, joining City of Eugene emergency preparedness staff, city managers, fire authorities, land managers, ODF, U.S. National Forests, and other regional stakeholders. The workshop is part of an ongoing effort to update Lane County's Community Wildfire Protection Plan, with participants examining challenges communities face in reducing wildfire risk, exploring anticipated future trends, and developing updated action items and implementation plan spanning multiple organizations and activity types.

**III. MAINTAINING REGULATORY EXCELLENCE**

*Aligns with Internal Process Perspective of the Balanced Scorecard framework and LRAPA's current goals 3 and 4—ensuring compliance with air quality standards through effective monitoring, permitting, and enforcement.*

**III.A. Stationary Source Permitting Progress & Efficiency**

*This section supports Goal 3 (Public Health Protection and Air Quality Education) metrics for permit issuance timeliness, permit backlog rate, and area NAAQS compliance.*

**Permitted Sources**

- Currently 15 sources hold a Title V operating permit in Lane County.
- Currently approximately 275 sources hold an ACDP.

Permits in Queue			
Category of Permit Activity	Title V	ACDP	Total In Queue
New	0	3	3
Renewals	1	5	6
Modifications	3	6	9
Constructions	-	-	-
Terminated Permits	-	-	-

**Stationary Sources Permits Issued, Year-to-Date**

- Title V Operating Permits: 0
- Air Contaminant Discharge Permits: 10

**Permits on public notice from February 1 to February 28, 2026**

Source Number and Name	Reason for Public Notice	Type of Permit
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**Permits on public notice from February 1 to February 28, 2026**

203129 Bakelite Chemicals LLC	Significant permit modification to reclassify the facility from a major to an area source of HAPs.	Title V Operating Permit modification on public notice January 13 – February 17, 2026.
203129 Bakelite Chemicals LLC	Permit modification to establish a limit on oxidizer bypass hours and include federally enforceable limits on throughputs to limit Hazardous Air Pollutants (HAPs).	Construction Air Contaminant Discharge Permit (C-ACDP) on public notice January 13 – February 17, 2026.
207092 Rexius Forest By-Products, Inc.	Permit renewal.	Simple Air Contaminant Discharge Permit (Simple ACDP) on public notice February 26 – April 2, 2026.

**Permit Backlog as of March 2, 2026**

Permit Type	Permits by Type	Permits Extended Administratively	Percentage of Total (%)
Title V	15	1	7%
Standard	24	3	13%
Simple	26	2	8%
<b>Total</b>	<b>65</b>	<b>6</b>	<b>9%</b>

**III.B. Asbestos Program Oversight**

This section supports **Goal 3 (Public Health Protection and Air Quality Education)** initiatives related to operating the asbestos program, including inspections and rule updates. LRAPA protects public health from asbestos hazards through effective oversight and education.

LRAPA administers the asbestos program in Lane County under title 43. This program regulates the handling, removal, and disposal of asbestos-containing materials to prevent public exposure to this hazardous substance. LRAPA reviews asbestos survey reports, processes abatement notifications, conducts inspections, and enforces compliance with asbestos regulations to protect workers and the public.

Asbestos Notices Feb. 1, 2026 to Feb. 28, 2026	Year-to-Date ↓						
	2020	2021	2022	2023	2024	2025	2026
Total Asbestos Abatement Notices	439	408	465	466	436	431	53

**III.C. Enforcement**

This section supports **Goal 3 (Public Health Protection and Air Quality Education)** metrics for enforcement action resolution and evaluations completed. The enforcement program ensures that regulations are followed, and violations are addressed.

LRAPA's compliance program ensures that air quality regulations are followed by stationary sources, asbestos contractors, and the general public. This section provides an overview of enforcement actions taken during the reporting period, including notices of non-compliance, civil penalties, and case resolutions.

Enforcement Feb. 1, 2026 to Feb. 28, 2026					
Category of Violation	New	Follow-Up Action	Pending	Closed	Total
Asbestos	1	-	1	1	3
Industrial	2	-	2	2	6

<b>Outdoor Burning</b>	1	-	3	-	<b>4</b>
<b>Fugitive Dust</b>	-	-	-	-	-
<b>Home Wood Heating</b>	-	-	-	-	-
<b>Totals</b>	<b>4</b>	<b>-</b>	<b>6</b>	<b>3</b>	<b>13</b>

**Attachment No. 3: February 2026, Enforcement Actions Detail Report.**

	2020	2021	2022	2023	2024	2025	2026
<b>Notices of Non-compliance and Warnings</b>	15	21	24	19	7	18	11
<b>Notices of Violation with Civil Penalties</b>	26	17	24	15	5	12	1

## IV. STRENGTHENING ORGANIZATIONAL CAPACITY

*Aligns with Learning & Growth Perspective of the Balanced Scorecard framework and LRAPA's current goal 6—developing staff capabilities and improving operational systems.*

### IV.A. Staff Development & Agency Growth

*This section supports Goal 6 (Organizational Excellence and Operational Efficiency) metrics focused on staff retention, professional development, and employee satisfaction, essential for achieving operational excellence.*

LRAPA maintains a skilled workforce to carry out our mission of protecting air quality in Lane County. This section provides an overview of our current staffing levels, vacancies, and professional development activities. Our commitment to staff development ensures we have the expertise needed to address complex air quality challenges effectively.

Department	FTE	Vacancies
Administration	5.0	0.0
Operations	10.0	2.0
Finance	2.0	0.0
Technical services	2.0	0.0
<b>Total</b>	<b>19.0</b>	<b>2.0</b>
<i>Agency at 89% of staffing capacity</i>		

LRAPA currently maintains 19.0 FTE across four departments. We presently have 17.0 FTE filled, representing 89% of our authorized staffing capacity.

The agency continues to hold two vacant positions as we navigate federal budget uncertainty and assess operational priorities. The cautious approach maintains financial flexibility while ensuring LRAPA can continue delivering essential air quality protection services to Lane County.

LRAPA remains committed to thoughtful workforce planning and staff development strategies that balance operational needs with fiscal responsibility during this period of federal budget uncertainty.

<b>Staff Professional Development, Year-to-Date</b>			
Training	Participation	Completion Date	Provider
Introduction to Continuous Monitoring Systems	3	January	Air Knowledge
Observing Source Tests	1	January	Air Knowledge
Regulation of Hazardous Air Pollutants (HAPs) from Stationary Sources	3	January	Air Knowledge
Compliance Assurance Monitoring	4	February	WESTAR
Aggregate, Asphalt, & Concrete Batching Plants	2	February	WESTAR
Function of Common Air Pollution Control Devices	1	February	WESTAR
Wage & Service Record Submission	1	February	PERS
What's New in ASAP	1	February	US Department of Treasury
CIS Annual Conference	1	February	CIS

**Compliance Assurance Monitoring** (February 10<sup>th</sup>, virtual)

Staff attended WESTAR Council's online training on Compliance Assurance Monitoring (CAM), focusing on EPA's 40 CFR Part 64 requirements for monitoring emission units at major sources. This course provides comprehensive training on regulatory reviews involving CAM requirements, which apply to emission units with active control devices whose potential pre-control device emissions are at or above major source thresholds. The training emphasized that emission units with approved CAM plans require sufficient monitoring to provide reasonable assurance of compliance with applicable permit terms and conditions. Staff gained understanding of CAM timing, implementation requirements, and how to evaluate CAM plans as part of Title V permit reviews, enhancing LRAPA's capacity to conduct thorough regulatory reviews of major sources subject to federal CAM requirements.

**Aggregate, Asphalt, & Concrete Batching Plants** (February 11<sup>th</sup>–12<sup>th</sup>, virtual)

Staff attended WESTAR Council's virtual training on Aggregate, Asphalt, and Concrete Batching Plants. Attendees completing this course gain a basic understanding of the general information associated with aggregate, asphalt, and concrete batching operations plants.

**Function of Common Air Pollution Control Devices** (February 18<sup>th</sup>-20<sup>th</sup>, virtual)

Staff attended WESTAR Council's introductory course on air pollution control devices, designed for agency inspectors and permit writers, responsible for reviewing air pollution control equipment. This foundational training provided a comprehensive understanding of different types and operating characteristics of control devices used for particulate matter, volatile organic compounds, carbon monoxide, acid gases, and hazardous air pollutants.

This training enhanced staff technical knowledge of control device technologies and operating principles, strengthening LRAPA's capacity to conduct effective inspections, evaluate permit applications, and ensure proper operation and maintenance of pollution control equipment at regulated facilities throughout Lane County.

**PERS Wage & Service Record Submissions** (February 18<sup>th</sup>, virtual)

Staff attended a one-hour webinar training with Oregon PERS on wage and service record submissions, which are required after each payday. The training focused on proper procedures for submitting employee wage and service information through PERS' Employer Data Exchange system. Topics covered included accurate completion of Detail 2 Wage and Service records, proper use of wage codes, reporting hours worked and subject salary, calculating and reporting employee IAP contributions, and meeting PERS' regular reporting deadlines based on LRAPA's pay frequency. This training ensures accurate and timely PERS reporting compliance, which is essential for proper calculation of employee retirement benefits and maintaining LRAPA's good standing with the PERS system.

**US Department of Treasury “What’s New in ASAP”** (February 18<sup>th</sup>, virtual)

Staff attended a one-hour webinar hosted by the US Department of Treasury on updates to the Automated Standard Application for Payments (ASAP) system, the secure web-based electronic payment portal federal agencies use to transfer funds to recipient organizations. ASAP allows LRAPA to request and receive federal grant payments from pre-authorized accounts established by funding agencies.

The training focused on new functionality released in March 2026, specifically enhanced security measures requiring federal agency certification before new or changed bank account information becomes active for recipient payments. Additional topics included system navigation, payment request procedures, account

management features, reporting capabilities, and security requirements including multi-factor authentication protocols. Staff also received updates on the various organizational roles within ASAP (Point of Contact, Financial Official, Authorizing Official, and Payment Requestor) and their respective responsibilities. This training ensures LRAPA staff maintain current knowledge of the ASAP system, enabling efficient management of federal grant fund drawdowns and compliance with Treasury payment system requirements essential for timely receipt of federal funding.

#### **CIS 24<sup>th</sup> Annual Conference** (February 25<sup>th</sup>-27<sup>th</sup>, virtual)

Staff attended the City/County Insurance Services (CIS) 24th Annual Conference, a three-day event focused on risk management, human resources, employee benefits, and safety for Oregon local government agencies. This annual conference brings together city and county professionals for learning, networking, and collaboration on practical strategies to strengthen local operations and services.

Key topics and sessions attended included:

- **HR Essentials:** Fostering effective workplace relationships, HR resources for managing critical incidents, navigating property and liability claims, and progressive discipline practices
- **Employee Benefits & Leave Management:** Maximizing CIS benefits programs, understanding canopy coverage for life changes, and comprehensive guidance on leave and accommodations requirements
- **Risk Management:** Cybersecurity essentials and threat assessments, safety and emergency management fundamentals, and building resilient safety committees
- **Workplace Culture & Wellness:** Strategies for preventing burnout and promoting employee wellbeing, recruitment best practices, and creating inclusive workplace cultures
- **Legal & Documentation:** Documentation best practices for workplace leaders, evolving emergency resilience strategies, and crisis management approaches

The conference provided valuable professional development in areas directly applicable to LRAPA's HR operations, risk management, and organizational culture initiatives. Sessions emphasized practical tools and strategies specifically designed for small public agencies with limited resources, making the content highly relevant to LRAPA's operational context.

## **IV.B. Operational Improvements & Innovation**

*This section supports **Goal 6 (Organizational Excellence and Operational Efficiency)** metrics for technology adoption and systems modernization, enhancing our efficiency and effectiveness in serving Lane County.*

LRAPA is working to improve our systems and processes to enhance efficiency and effectiveness. These improvements support our ability to fulfill our mission and provide better service to the public. Current initiatives focus on technology upgrades, document management, and standardized procedures.

Current activities underway:

**LINFO Database Upgrade:** LRAPA successfully transitioned to our central database system (LINFO) version 3.0 in summer 2025, which enhances our permit tracking, complaint management, and reporting capabilities. The system has been fully operational, and staff are actively using it while documenting bugs and identifying needed user-interface and functionality improvements.

LCOG has implemented select user interface updates and bug fixes to address immediate operational needs. To advance more substantial system enhancements, LRAPA is working with a staffing partner to secure a contract developer with experience in modern development tools, including AI-assisted coding, to accelerate progress on system improvements. The first development priority will be creation of an enforcement module within LINFO to

better support compliance and enforcement workflows. Additional priorities include user interface improvements identified by staff during daily use.

This approach positions LRAPA to make meaningful progress on system functionality in 2026 while maintaining LCOG's role in addressing routine fixes and ongoing support.

**Standard Operating Procedures (SOPs):** SOP development across all departments continues to build on the administrative framework established in prior months. In January and February, staff developed two agency-wide operational SOPs: a Workers' Compensation and Return-to-Work SOP (v1.0) establishing LRAPA's processes for reporting, investigating, and managing work-related injuries in compliance with Oregon law, including a transitional work program for injured employees; and an Emergency Action Plan and Continuity of Operations SOP (v1.0) documenting emergency response procedures for the LRAPA building and a continuity framework identifying essential functions, orders of succession, alternate work locations, and critical systems recovery procedures. The COOP plan was walked through with the Management Team on February 3.

Staff also developed three additional SOPs in February to support fleet safety and risk management: a Driving Eligibility SOP (v1.0) establishing qualifications and requirements for individuals authorized to drive on LRAPA business, a Driving Acceptability Matrix (v1.0) providing a point-based evaluation system for assessing driving records, and supporting forms for employee injury reporting and incident investigation. These policies were developed in coordination with the CIS Best Practices audit preparation and reflect LRAPA's continued investment in building a strong operational foundation.

**CIS Best Practices Audit:** On February 24, LRAPA participated in a Best Practices audit conducted by City County Insurance Services (CIS), our member-owned insurance pool. These audits assess whether agencies have appropriate policies, procedures, and practices in place to manage organizational risk across areas such as governance, personnel, contract management, fleet operations, and facilities. The purpose is collaborative, helping member agencies identify gaps and strengthen practices before problems occur.

This was LRAPA's first Best Practices audit since 2019-2020. Executive Director Travis Knudsen and Administrative Manager Rachelle Nicholas participated in the structured interview and document review on behalf of the agency. LRAPA was able to demonstrate strong practices in many areas and show meaningful progress on formalizing the administrative infrastructure that was not comprehensively documented. Where gaps remain, those were acknowledged along with the work underway to address them.

Formal feedback from CIS is expected in the coming weeks. Once received, staff will review any recommendations and develop action items as appropriate. Separately, CIS has indicated that liability premiums will decrease slightly this year, with property rates expected to decrease 10 to 12 percent. LRAPA's insurance broker, AssuredPartners, will provide guidance on coverage options as part of the upcoming renewal process.

## V. ENSURING FISCAL RESPONSIBILITY

*Aligns with Financial Stewardship Perspective of goal 7—managing financial resources effectively and transparently.*

### V.A. Budget Performance & Stability

*This section supports **Goal 7 (Financial Sustainability and Transparency)** metrics for budget variance and maintaining adequate reserves (4 months of operating budget), ensuring LRAPA can fulfill its mission consistently.*

**Please refer to the December 2025 financial update (Agenda item number 7).**

**FY26 Line Items to Note:** These line items are above 91% of the budgeted spending to date. (Target spending to date is 59% as of January 31, 2026).

- **General Fund** – The GF Personnel Services line item is at 92.3% of our targeted amount of 59% for January. It is expected that this line item will remain under budget for the year.
- **Special Revenue Fund (Title V)** – nothing to note.
- **Grant Fund** – nothing to note.

**FY26 Summary of Expenditures:** 59% of the year has elapsed as of **1/31/26**, and spending is below that threshold in each of the LRAPA funds. These are the categories we must consider when asking the question “Were we below or over budget for the year?”:

- **General Fund** Total Actual Expenditures as a % of Budgeted Annual Expenditures: **41%**
- **Special Revenue Fund** Total Actual Expenditures as a % of Budgeted Annual Expenditures: **40%**
- **Grant Fund Total** Actual Expenditures as a % of Budgeted Annual Expenditures: **38%**
- **All Funds Consolidated** Actual Expenditures as a % of Budgeted Annual Expenditures: **40%**

#### Grant Fund Details as of 10/31/2026

- **Targeted Airshed Grant 1.0** (November 2019 – November 2025)
  - Total grant amount: \$4,938,190
  - Spent to date: \$4,938,190
  - Remaining grant balance: \$0
  - Awaiting federal reimbursement (as of 12/31/25): \$0
  - Percentage of grant awaiting reimbursement: 0%
  
- **Targeted Airshed Grant TAG 2.0** (January 2022 – August 2027)
  - Total grant amount: \$2,739,425
  - Spent to date: \$617,299.37
  - Remaining grant balance: \$2,122,125.63
  - Awaiting federal reimbursement (as of 10/3/25): \$355,884.17
  - Percentage of grant awaiting reimbursement: 13%

**Please Note:** LRAPA’s practice is to keep the percentage of grant awaiting reimbursement below 25%.

## V.B. Financial Transparency & Reporting

This section supports **Goal 7 (Financial Sustainability and Transparency)** metrics for financial reports provided to the Board (target: monthly) and timely audit completion (target: before December 31). Transparency in financial matters builds trust with our stakeholders and ensures accountability.

Fiscal Year: 2025-2026	Status	Completion Date
Budget FY26	Adopted	May 2025
Prior Year Audit - FY25	Completed	February 2026
Current Year Audit FY26	Scheduling is Pending	To be scheduled by April 2026

**Auditor Selection Process:** Following Board direction at the November 2025 and January 2026 meetings, LRAPA initiated a competitive procurement process for audit services for FY26 and subsequent years. Staff conducted an Informal Written Quotes method consistent with the Board's objectives for competition, transparency, and administrative efficiency. Board Chair Saxion and Vice-Chair Loveall reviewed the RFQ before distribution and provided input on evaluation criteria ordering.

On January 26, 2026, LRAPA issued a Request for Written Quotes to ten qualified Oregon CPA firms, including LRAPA's current auditor and firms recommended by local government partners. The RFQ requested quotes for FY26 audit services with options for FY27 and FY28 renewals.

By the February 23 deadline, LRAPA received proposals from two firms: Isler CPA (Eugene) and Pauly, Rogers and Co., P.C. (Tigard). Both firms hold current Oregon Municipal Auditor licenses, confirmed independence from the Agency, and submitted proposals responsive to the RFQ requirements.

Staff are currently evaluating the proposals against the criteria outlined in the RFQ, which include Oregon government audit experience, deadline commitment and reliability, technology and document management, staff qualifications, and price. A contract recommendation will be presented to the Board at a future meeting, with the selected auditor beginning FY26 audit fieldwork in fall 2026.

# VI. BOARD CALENDAR

A tentative review of upcoming initiatives, events, and board business.

2026	2027
<p><b>January</b></p> <ul style="list-style-type: none"> <li><del>– Preview upcoming appointments on board and committees.</del></li> <li><del>– City of Eugene Public Health Standards Code Amendments</del></li> <li><del>– Director’s Contract Approval</del></li> </ul> <p><b>February</b></p> <ul style="list-style-type: none"> <li><del>– Oakridge Air Update</del></li> <li><del>– FY’25 Audit Report &amp; Presentation</del></li> <li><del>– Appoint new Budget Committee members, and appoint Budget Officer</del></li> </ul> <p><b>March</b></p> <ul style="list-style-type: none"> <li><del>– Potential Supplemental Budget</del></li> <li><del>– Budget Committee Meeting for FY’26-27</del></li> <li><del>– Elect the Board Chair and Vice Chair</del></li> </ul> <p><b>April</b></p> <ul style="list-style-type: none"> <li>– Budget Committee Meeting for FY’26-27</li> <li>– Approve Budget</li> <li>– Legislative Short Session Review</li> <li>– Auditor Engagement Update</li> </ul> <p><b>May</b></p> <ul style="list-style-type: none"> <li>– Public Hearing of FY’26-27 Approved Budget, Board Adoption</li> <li>– Oakridge Air Update</li> <li>– Caselle Update on Resolution #26-01</li> </ul> <p><b>June</b></p> <ul style="list-style-type: none"> <li>– Outdoor Burning Season Review</li> </ul> <p><b>July</b></p> <ul style="list-style-type: none"> <li>– Rulemaking Review</li> <li>– Review PERS UAL Liability &amp; Investment Strategy</li> </ul> <p><b>August</b></p> <ul style="list-style-type: none"> <li>– No Meeting</li> </ul> <p><b>September</b></p> <ul style="list-style-type: none"> <li>– Review Local Partner Dues Calculation for FY’26-27</li> <li>– Wildfire Smoke Management Season Update</li> <li>– Annual Review of Board Designated LGIP Account</li> </ul> <p><b>October</b></p> <ul style="list-style-type: none"> <li>– Approve Local Dues Calculation for FY’26-27.</li> <li>– Smoke Management Season Update/Review</li> </ul> <p><b>November</b></p> <ul style="list-style-type: none"> <li>– Audit Update, FY’26-27</li> <li>– Home Wood Heating Season Update</li> </ul> <p><b>December</b></p> <ul style="list-style-type: none"> <li>– No Meeting</li> </ul>	<p><b>January</b></p> <ul style="list-style-type: none"> <li>– Preview upcoming appointments on board and committees.</li> <li>– Oakridge Air update</li> </ul> <p><b>February</b></p> <ul style="list-style-type: none"> <li>– Appoint new Budget Committee members, and appoint Budget Officer</li> <li>– Elect the Board Chair and Vice-Chair</li> </ul> <p><b>March</b></p> <ul style="list-style-type: none"> <li>– Potential Supplemental Budget</li> <li>– Budget Committee Meeting for FY’27-28</li> </ul> <p><b>April</b></p> <ul style="list-style-type: none"> <li>– Budget Committee Meeting for FY’27-28; Approve Budget</li> <li>– Executive Director’s Performance Evaluation Process</li> </ul> <p><b>May</b></p> <ul style="list-style-type: none"> <li>– Public Hearing of FY’27-28 Approved Budget, Board Adoption</li> <li>– Oakridge Air Update</li> </ul> <p><b>June</b></p> <ul style="list-style-type: none"> <li>– Outdoor Burning Season Review</li> </ul> <p><b>July</b></p> <ul style="list-style-type: none"> <li>– Rulemaking Review</li> <li>– Review PERS UAL Liability &amp; Investment Strategy</li> </ul> <p><b>August</b></p> <ul style="list-style-type: none"> <li>– No Meeting</li> </ul> <p><b>September</b></p> <ul style="list-style-type: none"> <li>– Review Legislative Long Session.</li> <li>– Review Local Partner Dues Calculation for FY’27-28.</li> <li>– Wildfire Smoke Management Season Update</li> <li>– Annual Review of Board Designated LGIP Account</li> </ul> <p><b>October</b></p> <ul style="list-style-type: none"> <li>– Approve Local Dues Calculation for FY’27-28.</li> <li>– Smoke Management Season Update/Review</li> </ul> <p><b>November</b></p> <ul style="list-style-type: none"> <li>– Audit Update, FY’27-28</li> <li>– Home Wood Heating Season Update</li> </ul> <p><b>December</b></p> <ul style="list-style-type: none"> <li>– No Meeting</li> </ul>

## VII. LRAPA STRATEGIC GOALS REFERENCE SHEET

*These ongoing and sustained goals are designed to ensure comprehensive performance management across four key perspectives. This reference sheet provides an overview of each strategic goal and its associated performance metrics.*

**MISSION:** To protect public health, quality of life and the environment as a leader and advocate for the continuous improvement of air quality in Lane County.

**VISION:** Community partners working together to ensure clean air for everyone.

### GOAL 1: Public Health Protection and Air Quality Education

Protect public health through air quality initiatives and foster community engagement via educational programs, prompt response to public concerns, and efforts to ensure equitable protection from air pollution for all communities.

#### Lag Indicators

- % of days in "Good" or "Moderate" AQI categories by monitoring location (target: 95% annually)
- Number of days with PM2.5 or PM10 exceeding NAAQS 24-hour standards (target: 0)
- % of complaints responded to (target: 95%)

#### Lead Indicators

- Number of educational events/programs conducted quarterly (target: 2 per quarter)
- Number of wood heating advisories issued (target: prior to 150 AQI in metro)
- Email listserv growth (target: >3% increase annually)

### GOAL 2: Enhanced Wildfire Smoke Preparedness

Address the increasing threat of wildfire smoke intrusions to public health in Lane County through public education, collaboration with local jurisdictions, and enhanced monitoring and communication during wildfire events. In addition to seeking funding avenues which directly support this new and growing smoke management service need.

#### Lag Indicators

- Response time to publish smoke advisories during events (target: before 1pm on days needed)

#### Lead Indicators

- Maintain LRAPA supported commercial air sensors in Lane County (target: approximately 75)
- State smoke advisory engagement (target: 100% participation)

### GOAL 3: Public Health Protection and Air Quality Education

Ensure compliance with National Ambient Air Quality Standards (NAAQS) and other health-based benchmarks, manage air quality permits for regulated sources, and implement best practices in emissions control, balancing economic development with environmental protection through rigorous permitting processes.

#### Lag Indicators

- % of area in compliance with NAAQS standards (target: 100%)
- % of permits issued within target timeframes (target: 90%)
- Permit backlog rate (target: <20%)

#### Lead Indicators

- Number of annual Full Compliance Evaluations completed vs. EPA committed (target: 100%)
- % of enforcement actions resolved within 6 months (target: 80%)

#### GOAL 4: Regional Air Monitoring and Analysis

Collect, analyze, and report comprehensive air quality data across Lane County to inform policy decisions, alert the public, and track long-term air quality trends.

##### Lag Indicators

- % data completeness for monitoring network (target: >95%)
- Timeliness of data reporting to the public and EPA (target: 100% on schedule)

##### Lead Indicators

- % of monitors calibrated on schedule (target: 100%)
- % uptime for real-time data systems (target: 98%)
- Number of monitoring site quality assurance audits completed vs. EPA committed (target: 100%)

#### GOAL 5: Partnerships and Interagency Coordination

Build and maintain strong relationships with various stakeholders, including industry, local jurisdictions, and community groups, to foster collaboration, improve communication, and ensure that LRAPA's work is responsive to community needs and concerns.

##### Lag Indicators

- Number of industry outreach initiatives completed annually (target: 1 per year)
- Number of community outreach initiatives completed annually (target: 1 per year)
- Number of partner outreach engagements completed annually (target: 5 per year)

##### Lead Indicators

- Diversity of inter-agency meetings attended (target: prioritize local, then state, then federal engagements)
- Number of monitoring site quality assurance audits completed vs. EPA committed (target: 100%)
- Communication frequency with key stakeholders (target: Quarterly communication)
- Number of council presentations delivered (target: 1 per jurisdiction annually)

#### GOAL 6: Organizational Excellence and Operational Efficiency

Strengthen LRAPA's internal systems, workflows, and operational capacity through technology integration, process improvement, and staff development to enhance organizational effectiveness and service delivery.

##### Lag Indicators

- Employee satisfaction/engagement scores (target: 85% satisfaction)
- Staff retention rate (target: >85% annually)
- % completion of internal systems modernization (target: 100% of planned upgrades, e.g. LINFO)

##### Lead Indicators

- Number of staff professional development training completed (Target: 2 per staff per year)
- Number of staff utilizing advancing technologies in workflows (target: > 50%)

#### GOAL 7: Financial Sustainability and Transparency

Ensure LRAPA's long-term financial stability and improve fiscal transparency through diversified funding sources, robust financial management practices, and clear communication of financial decisions to stakeholders.

##### Lag Indicators

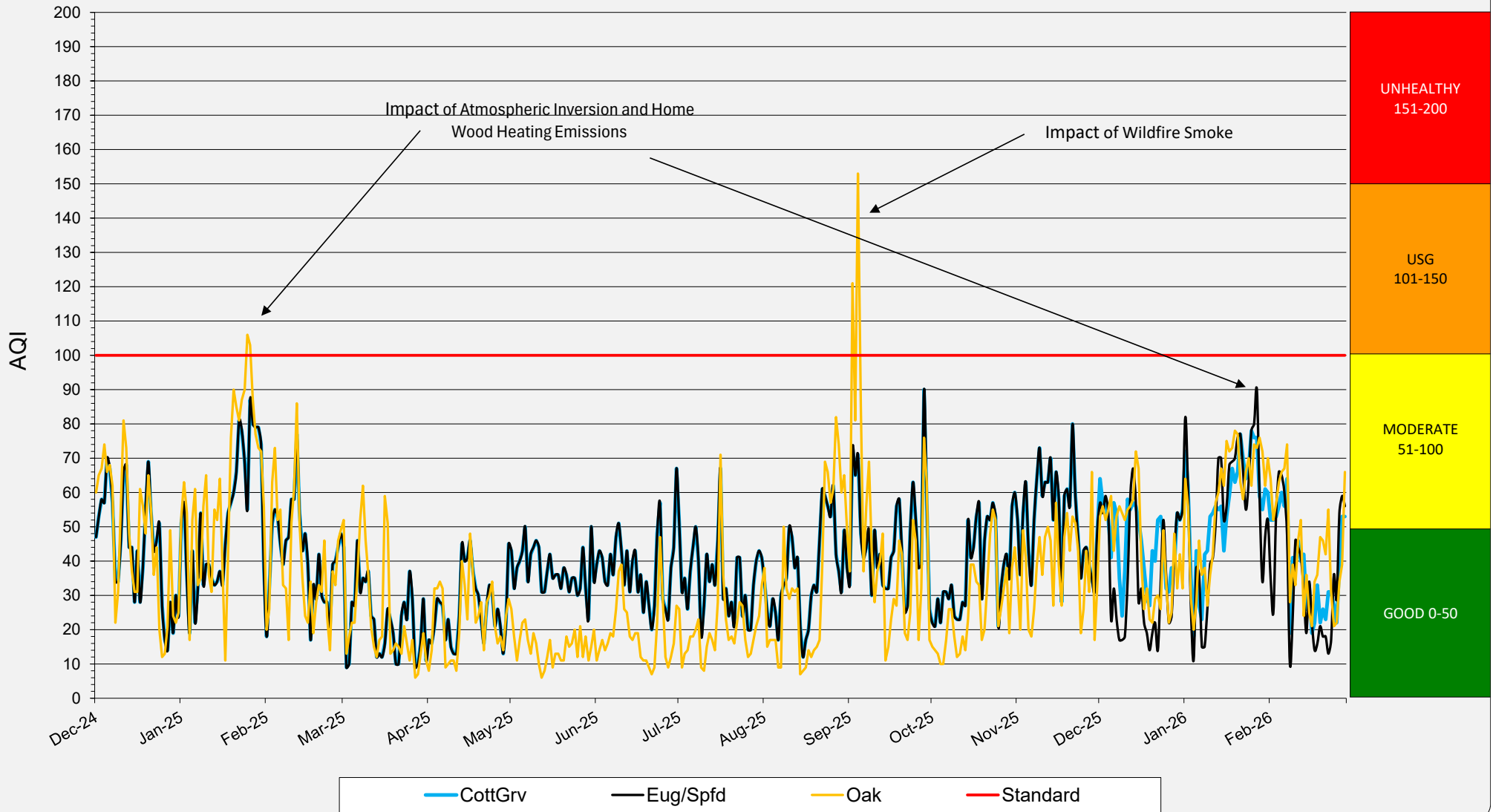
- Reserve fund supporting annual operating budget (target: 4 months)
- Budget variance (target: within 10% of planned)

##### Lead Indicators

- Number of financial reports provided to Board & public (target: monthly to Board)
- Audit completed before state deadline (target: Dec. 31)

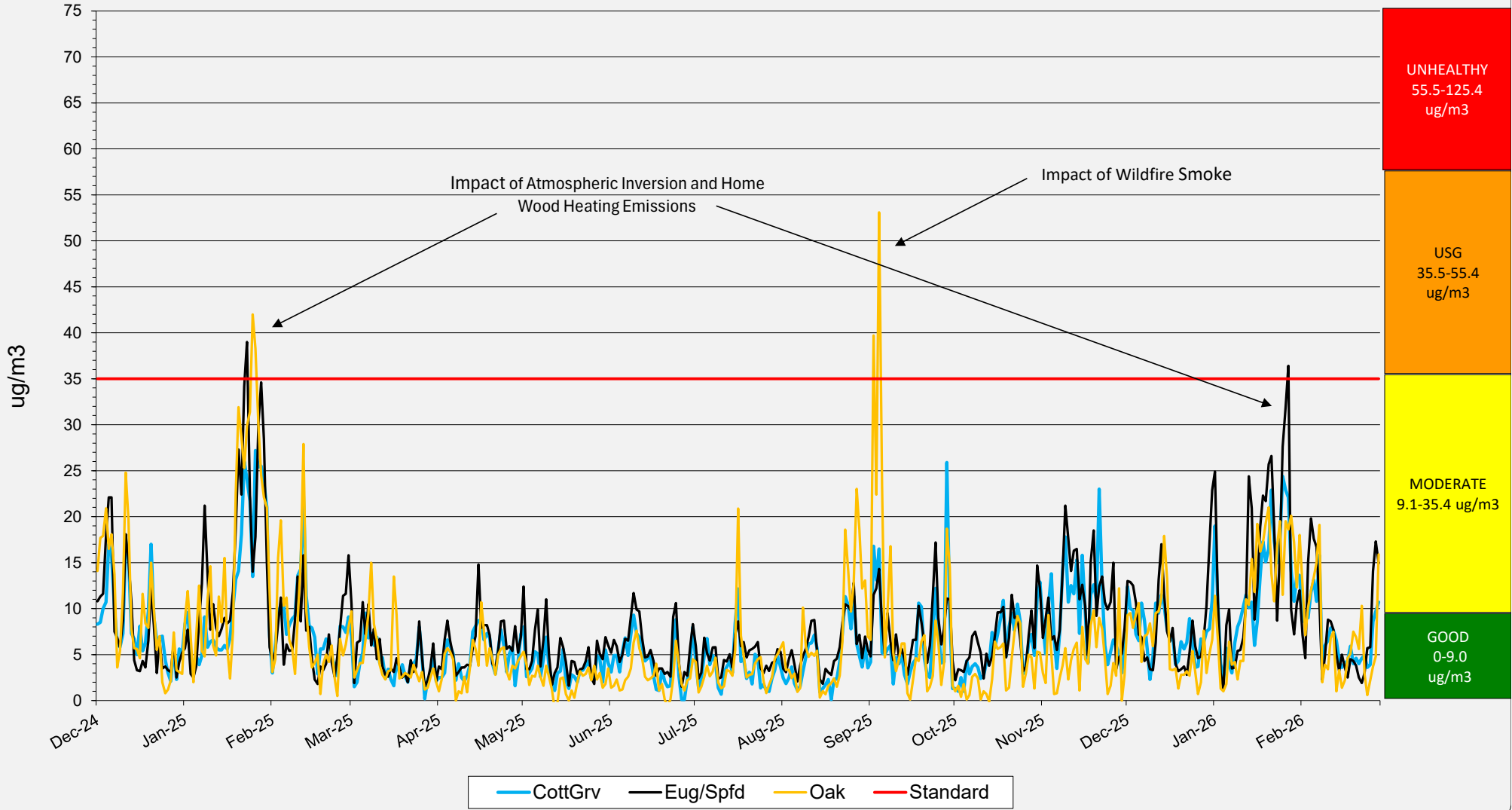
# Daily Air Quality Index (AQI) Chart

This 15-month chart demonstrates the seasonality of the pollutants.



# Daily PM2.5 Levels

Daily Sampling, NAAQS Exceedance is Triggered on the 8th High



**NEW/OPEN ENFORCEMENT ACTIONS DETAIL REPORT**  
**02/01/2026 – 02/28/2026**  
**Report of open actions initiated since last report**

**NEW (Enforcement actions issued in the current reporting period:**

1. 9WOOD INC. (SPRINGFIELD)
  - A. Violation: Fugitive dust was observed emitting from the dumpster in Respondent's parking lot and was traveling across 'A' Street and depositing on neighboring properties.
  - B. Initial Action Taken: NON #3954 issued 2/4/2026
  - C. Subsequent Action: None – Respondent immediately remedied the fugitive dust emissions. No further action.
  - D. Resolution: CASE CLOSED on 2/6/2026
  - E. Source Type: TITLE V
  - F. Initiated By: INSPECTION
  
2. WILLAMETTE VALLEY SANDBLASTING (EUGENE)
  - A. Violation: Failure to comply with their ACDP 208923 conditions to perform visible emissions survey of plant
  - B. Initial Action Taken: NON #3956 issued 2/19/2026
  - C. Subsequent Action: PENDING
  - D. Resolution: PENDING
  - E. Source Type: ACDP
  - F. Initiated By: INSPECTION
  
3. LODGE ENVIRONMENTAL (EUGENE)
  - A. Violation: During an inspection of an asbestos abatement project the Respondent failed to install a viewing window which is a violation of 43-015-11-F-5.
  - B. Initial Action Taken: NON #3957 issued 2/4/2026
  - C. Subsequent Action: PENDING

- D. Resolution: PENDING
  - E. Source Type: ASBESTOS
  - F. Initiated By: INSPECTION
4. GIELISH, SCOTT (EUGENE)
- A. Violation: Outdoor burning unattended, failure to promote efficient combustion and failure to follow strict wind vectors when burning.
  - B. Initial Action Taken: NON #3958 issued 2/25/2026
  - C. Subsequent Action: PENDING
  - D. Resolution: PENDING
  - E. Source Type: OUTDOOR BURNING
  - F. Initiated By: COMPLAINT

**PENDING (Enforcement actions issued prior to 02/01/2026 with no reporting action in the current reporting period):**

1. JEFFREY HEITZMAN & JANICE CASTLE (EUGENE)
- A. Violation: Outdoor burning of prohibited materials including construction/ demolition debris.
  - B. Initial Action Taken: NON #3948 issued 1/15/2026
  - C. Subsequent Action: NCP #2025-3948 (\$3,388) issued 1/15/2026:
  - D. Resolution: PENDING
  - E. Source Type: OUTDOOR BURNING
  - F. Initiated By: COMPLAINT
2. RADIUS RECYCLING (EUGENE)
- A. Violation: Outdoor burning where prohibited and outdoor burning of prohibited materials.
  - B. Initial Action Taken: NON #3951 issued 1/14/2026
  - C. Subsequent Action: PENDING – waiting for additional information due 3/15/2026

- D. Resolution: PENDING
  - E. Source Type: OUTDOOR BURNING
  - F. Initiated By: COMPLAINT
3. GREENSIDE CONSTRUCTION INC. (HAPPY VALLEY)
- A. Violation: During an inspection, no signage identifying an air curtain incinerator activities and information was present at Buford Park in Eugene which is in violation of their Permit No. 206131 condition 6.1.c. ii.
  - B. Initial Action Taken: NON #3953 issued 1/27/2026
  - C. Subsequent Action: PENDING – waiting for additional information due 3/15/2026
  - D. Resolution: PENDING
  - E. Source Type: ACI
  - F. Initiated By: INSPECTION
4. AURORA INNOVATIONS, LLC / HYDROFARM (EUGENE)
- A. Violation: Aurora Innovations LLC (Aurora) has allegedly allowed perlite fines processed at the facility to become fugitive and cause visible deposition on neighboring properties and is a violation of ACDP permit #200053 Permit Condition G4. It is also alleged that Aurora failed to monitor baghouse pressure drop or conduct fugitive surveys in 2024. The failure to monitor baghouse pressure drop and to conduct fugitive emission surveys are in violation of ACDP permit #200053 Permit Conditions 27 & 13.
  - B. Initial Action Taken: NON #3949 issued 1/22/2026
  - C. Subsequent Action: PENDING
  - D. Resolution: PENDING
  - E. Source Type: ACDP
  - F. Initiated By: COMPLAINT
5. DUST 2 DIAMONDS, LLC (SPRINGFIELD)
- A. Violation: Performed an asbestos abatement project without possessing a license to perform asbestos abatement; openly accumulated friable asbestos-containing materials.

- B. Initial Action Taken: NON #3908 issued 9/6/2024
  - C. Subsequent Action: NCP #2024-3908 (\$8,400) issued 9/6/2024; request for reduction approved and reduced to \$4,800 with a payment plan of \$100; payments are on schedule as of 2/28/2026.
  - D. Resolution: PENDING
  - E. Source Type: ASBESTOS
  - F. Initiated By: INSPECTION
6. REMEDIOS ROMERO (COTTAGE GROVE)
- A. Violation: Respondent conducted the burning of prohibited materials, including painted wood, metal, tin cans, plastic bags, food waste, plastics fiberglass roofing and general household garbage in a burn barrel.
  - B. Initial Action Taken: NON #3930 issued 08/06/2025
  - C. Subsequent Action: NCP #2025-3930 (\$1,019) issued 08/06/2025; no response, default order and judgment (DOJ) in process
  - D. Resolution: PENDING
  - E. Source Type: OUTDOOR BURNING
  - F. Initiated By: COMPLAINT

**CLOSED ENFORCEMENT CASES Enforcement closed in the current reporting period 02/01/2026 – 02/28/2026):**

1. PACIFIC ENVIRONMENTAL GROUP (EUGENE)
- A. Violation: Conducting an asbestos abatement project without having the required asbestos survey on site.
  - B. Initial Action Taken: NON #3955 issued 1/15/2026
  - C. Subsequent Action: None – Respondent submitted the survey. No further action.
  - D. Resolution: CASE CLOSED 02/04/2026
  - E. Source Type: ASBESTOS
  - F. Initiated By: INSPECTION

2. 9WOOD INC. (SPRINGFIELD)
  - A. Violation: Fugitive dust was observed emitting from the dumpster in Respondent's parking lot and was traveling across 'A' Street and depositing on neighboring properties.
  - B. Initial Action Taken: NON #3954 issued 2/4/2026
  - C. Subsequent Action: None – Respondent immediately remedied the fugitive dust emissions. No further action.
  - D. Resolution: CASE CLOSED on 2/6/2026
  - E. Source Type: TITLE V
  - F. Initiated By: INSPECTION
  
3. AURORA INNOVATIONS, LLC / HYDROFARM (EUGENE)
  - A. Violation: Aurora Innovations LLC submitted their 2024 Annual Report late. Condition 28 of LRAPA issued ACDP permit #200053 requires annual reporting of information from the previous year to be submitted by February 15th. The 2024 report was not received by LRAPA until 6/23/2025.
  - B. Initial Action Taken: NON #3946 issued 1/22/2026
  - C. Subsequent Action: None – Respondent submitted the complete 2025 annual report on 02/13/2026. No further action.
  - D. Resolution: CASE CLOSED on 2/25/2026
  - E. Source Type: ACDP
  - F. Initiated By: INSPECTION