City Council

Agenda

City Hall
225 Fifth Street
Springfield, Oregon 97477
541-726-3700
Online at www.springfield-or.gov

City Manager:
Nancy Newton

City Recorder:
Allyson Pulido
541-726-3700

Mayor
Sean VanGordon

City Council
Michelle Webber, Ward 1
Steve Moe, Ward 2
Kori Rodley, Ward 3
Vacant, Ward 4
Andrew Buck, Ward 5
Alan Stout, Ward 6

These meetings will be available via phone, internet using Zoom and in person. Members of the public wishing to attend these meetings electronically can call in or attend virtually by following the directions below. This information can also be found on the City's website.

The meeting location is wheelchair-accessible. For the hearing-impaired, an interpreter can be provided with 48 hours' notice prior to the meeting. For meetings in the Council Meeting Room, a "Personal PA Receiver" for the hearing impaired is available, as well as an Induction Loop for the benefit of hearing aid users.
To arrange for these services, call 541-726-3700.

Meetings will end prior to 10:00 p.m. unless extended by a vote of the Council.

All proceedings before the City Council are recorded.

April 13, 2026
Monday

5:30 p.m. Work Session
AMENDED AGENDA: Amended to remove History Museum Interviews.
Council Meeting Room
or
Virtual Attendance
Registration Required:
Attend from your computer, tablet or smartphone:
Zoom
Meeting ID: 834 6890 2883
Copy the link below into an internet browser to register
https://us06web.zoom.us/webinar/register/WN_CkgTdwW9R5KADkqCzXkM-w
To dial in using your phone in Listen Only Mode:
Dial 1 (971) 247-1195
Toll Free 1 (877) 853-5247
Oregon Relay/TTY: 711 or 800-735-1232

(Council work sessions are reserved for discussion between Council, staff and consultants; therefore, Council will not receive public input during work sessions. Opportunities for public input are given during all regular Council meetings)

CALL TO ORDER

ROLL CALL -- Mayor VanGordon___, Councilors Webber___, Moe___, Rodley____, Buck ___, and Stout ___.

1. MS4 Phase II Stormwater Permit Renewal
   [Meghan Murphy] (20 mins)

2. Sanipac Annual Rate Adjustment and Update
   [Josiah Broomfield] (30 mins)

3. 2025 SPD Annual Use of Force Report

[Chief Resch & Lily Wick] (30 mins)

ADJOURNMENT

AGENDA ITEM SUMMARY	Meeting Date:	04/13/2026
	Meeting Type:	Work Session
	Staff Contact/Dept:	Meghan Murphy/Environmental Services Division
	Staff Phone No:	541-744-3385
SPRINGFIELD	Estimated Time:	20 Minutes
CITY COUNCIL	Council Goals:	Mandate

ITEM TITLE:
MS4 Phase II Stormwater Permit Renewal

ACTION REQUESTED:
Staff seeks to update Council on the status of the City's National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit renewal.

ISSUE STATEMENT:
The Oregon Department of Environmental Quality (DEQ) released a Public Review Draft of the renewed MS4 Phase II General Permit on February 18, 2026. If implemented as proposed, staff expects impacts to the City's stormwater programs.

DISCUSSION/FINANCIAL IMPACT:
The City of Springfield operates under an MS4 Phase II General Permit (Permit) issued by the DEQ in 2021, as required under the Federal Clean Water Act. The Permit authorizes municipalities to discharge stormwater to surface waters of the state, including the Willamette and McKenzie rivers. Based on community size, permits are either Phase II (population 50,000 to 100,000, or proximity to urbanized areas) or Phase I (populations greater than 100,000).

MS4 permits are issued for five-year terms and may be administratively extended at the discretion of DEQ. Springfield's current permit has been administratively extended since February 28, 2024. Over the past two years, DEQ has been developing an updated MS4 Phase II General Permit. Springfield submitted comments on the registrant draft in September (Attachment 1); DEQ released the Public Review Draft (Draft Permit) on February 18, 2026 (Attachment 2). The Draft Permit reflects only minor revisions and does not address the City's comments.

MS4 permits are an important tool for protecting water quality and aquatic habitat. However, the Draft Permit includes new provisions previously required only of larger Phase I communities, such as adaptive management assessments, a Total Maximum Daily Load (TMDL) and waterway impairment pollutant evaluation, and development of a detailed winter operations and maintenance program.

Other requirements exceed those of current Phase I permittees, such as conducting a detailed outreach survey and preparing a technical memorandum linking treatment standards to pollutant removal efficiency for green stormwater infrastructure. The Draft Permit also requires an industrial site screening and the creation of a list of facilities that may require industrial stormwater permits, which is a program under the exclusive responsibility of DEQ, not municipalities.

If implemented as proposed, the Draft Permit will have considerable operational and financial impacts on the City. Anticipated effects over the permit term include additional staffing, increased program funding, and increases to stormwater user fees. Staff are preparing formal comments for submission to DEQ by the April 24, 2026 deadline. DEQ will then review public comments received and is expected to issue the final renewed Permit by July 1, 2026.

Attachments
1. Registrant Draft MS4 Permit Comment Letter
2. Public Review Draft MS4 Phase II General Permit
3. MS4 Phase II Stormwater Permit Renewal Presentation

CITY OF SPRINGFIELD, OREGON

DEVELOPMENT AND PUBLIC WORKS DEPARTMENT
ENVIRONMENTAL SERVICES DIVISION

225 FIFTH STREET
SPRINGFIELD, OR 97477
(541) 726-3694
FAX (541) 726-2309
www.springfield-or.gov

September 5, 2025

Department of Environmental Quality Stormwater Division
700 NE Multnomah St, Suite 600
Portland, OR 97232-4100

RE: Draft MS4 Phase II General Permit Comments

The City of Springfield appreciates the opportunity to provide comments on the draft MS4 Phase II General Permit. It is important that Springfield receive a clear, attainable, and implementable permit that will continue to advance improvements in water quality. We ask that DEQ consider these comments during the final development of the permit.

Springfield is located between two rivers, the Willamette and the McKenzie, and was the first permitted MS4 Phase II in the state, receiving an individual MS4 Phase II permit in 2007. Program planning to implement the City's initial permit requirements began in 2000. Between 2000 and 2007, Springfield spent considerable time and resources mapping our MS4, completing outfall inventories, creating databases and implementing data tracking mechanisms. We drafted and adopted municipal and development codes and hired staff to implement permit requirements.

Since that time, Springfield has continued to optimize and refine our stormwater programs to meet regulatory requirements and protect water quality. In doing so, we have developed a well-established and mature stormwater program. Despite these efforts, the conditions of the proposed draft MS4 Phase II General Permit will be difficult to implement at best, and not achievable in some cases.

Language in the permit as drafted will require Phase II communities to implement requirements typical of Phase I permittees, including adaptive management assessments, TMDL and 303(d) evaluations, and detailed winter operations and maintenance programs. The draft permit also includes proposed requirements that extend beyond those contained in many Phase I permits, including conducting detailed surveys, inspecting construction sites twice during the their permit term, and submitting technical memorandums linking treatment performance standards to expected pollutant removal efficiency for TMDL and 303(d) impairment pollutants.

A summary of Springfield's high-level concerns is provided numerically below. Additional comments are provided as attachments to this letter.

1. **Placement of State Responsibilities in a Municipal Permit**
   Springfield is not an agent for the DEQ for 1200z permits. The requirements for industrial site screening in Schedule A.3.g are the responsibility of the state and should not be placed on Phase II permittees. Completing an inventory of all industries in Springfield and evaluating whether they qualify for a 1200z permit will take considerable staff time and resources. The NPDES regulations for Phase II MS4s do not authorize DEQ to require MS4 permittees to assist with the industrial stormwater permit program, which is under the exclusive authority of the DEQ.

Springfield believes this requirement may run afoul of the prohibition on unfunded mandates in Article XV, section 15, of the Oregon Constitution. Springfield requests the industrial site screening control measure be removed from the draft permit as there is no legal basis to require an MS4 permittee to participate in the separate NPDES program for industrial activities.

2. TMDL and 303(d) List Impairment Pollutants Integration into MS4 Permit

There are several sections of the draft MS4 permit where new requirements for addressing TMDL and 303(d) list/impairment pollutants have been added, including in Public Education and Outreach (Schedule A.3.a.iv.B.10), Annual Field Screening of Priority Locations (Schedule A.3.c.vi.A), and Stormwater Treatment Performance Standard (Schedule A.3.e.iii.C).

In addition, Phase II permittees would be required to conduct a TMDL and 303(d) Evaluation (Schedule D.1.b). This has been required of Phase I permittees that have greater resources and conduct water quality monitoring to augment their evaluations. Some Phase I permittees have hired consultants to complete this requirement in the past. Unlike Phase I permits, Phase II permits must contain only terms and conditions that are "clear, specific, and measurable." 40 CFR 122.34(a). As explained in the *NPDES Municipal Separate Storm Sewer System General Permit Remand, Final Rule*, it is the permitting authority's responsibility, and not that of the small MS4 permittee, to establish permit terms and conditions that meet the MS4 regulatory standard and to delineate the requirements for implementing the six minimum control measures, other terms and conditions deemed necessary to by the permitting authority to protect water quality, as well as any other requirement." See 81 FR at 89326. The TMDL and 303(d) Evaluation include requirements that are not clear, specific, or measurable, and also shift the burden to the MS4 permittee to determine the requirements needed to meet the MS4 regulations.

Additionally, the TMDL and 303(d) Evaluation depend upon an "end-result" requirement that was struck down in the recent case *City and County of San Francisco v EPA*, 145 S Ct 704 (2025). This section requires permittees to evaluate whether it is reasonably likely that discharges from the MS4 will "cause or contribute to water quality degradation of receiving waters," notwithstanding that the permittee may be in compliance with all other permit requirements, and then to change the SWMP to prevent the water quality exceedance. This provision is effectively an end-result provision similar to the requirement in *City and County of San Francisco v. EPA* that would have prohibited San Francisco's combined sewer overflow discharge from causing or contributing to violation of a water quality standard in the San Francisco Bay. The US Supreme Court struck down the end-result requirement as being inconsistent with the Clean Water Act at 33 USC 1311. This statute also applies to Phase II MS4 permits, and thus any permit requirements that are an end-result requirement also violate the Clean Water Act.

Springfield requests that the TMDL and 303(d) Evaluation (Schedule D.1.b) be removed from the draft permit because there is no legal basis to require this in an MS4 Phase II permit.

The addition of the requirement to complete a technical memorandum to address expected pollutant removal efficiencies of TMDL and impairment pollutants in post-construction controls in Schedule A.3.e.iii.C is redundant of the TMDL and 303(d) Evaluation in Schedule D.1.b. The technical memorandum is above and beyond what is required of Phase I permittees and there is no basis for requiring it for Phase II permittees; therefore Springfield requests the technical memorandum requirement be removed from the draft permit Schedule A.3.e.iii.C (the last paragraph).

3. **Increased Data Collection and Assessment**

Throughout the draft permit, there are numerous new requirements for increased data collection and assessment. Many Phase IIs do not have tracking mechanisms in place to collect or analyze this data. It is unclear how these increased tracking requirements are related to a federal regulation, or how DEQ will store or use this data.

These new requirements violate the provision for Phase II permits to include only "clear, specific, and measurable" requirements. Additionally, DEQ has not demonstrated that these requirements that are more stringent than, or in addition to, the minimum control measures in 40 CFR 122.34, are the result of a TMDL analysis or are needed to protect water quality. See 40 CFR 122.34(c)(1).

Springfield requests that the following be removed from the draft permit:

- Detailed public education survey (Schedule A.3.a.vi);
- Data collection on the estimated volume of trash/debris removed during the cleaning of catch basins, inlets, water quality facilities, pipes, etc. per catch basin or as a total or by category or by type of activity, the number of structures of each category inspected or cleaned, and linear feet of pipe cleaned (Schedule A.3.f.iii.C);
- Winter Maintenance Operations and Maintenance Program (Schedule A.3.f.vi); and
- Data collection on litter removed from MS4 during maintenance and cleaning activities, parks, and events (Schedule A.3.f.viii).

In addition, under Schedule B.1, there are new requirements for completing two adaptive management assessments. The requirement to conduct these assessments and implement their results are not clear, specific, or measurable requirements. Adaptive management is an important aspect of an MS4 permittee's SWMP, but the assessment and implementation requirement impermissibly converts permittee's adaptive management choices into an MS4 permit requirement. See *Final Rule*, 81 FR at 89339 ("While the requirement to develop a SWMP document is an enforceable condition of the permit (see § 122.34(b) of the final rule), the contents of the SWMP document and the SWMP document itself are not enforceable as effluent limitations of the permit, unless the document or the specific details within the SMWP are specifically incorporated by the permitting authority into the permit.") Because there is no legal basis for including the adaptive management assessment in the Phase II MS4 permit, Springfield requests this requirement be removed from the draft permit.

4. **Language Review**

Springfield requests that DEQ review the existing MS4 Phase II General Permit language that was agreed upon through settlement agreement with multiple permittees, to ensure the spirit and intent of said language is maintained.

The draft permit should be consistent with the EPA guidance for NPDES permit drafting, to ensure that the permit's terms and conditions are clear, specific, and measurable. EPA's guidance is available in the *National Pollutant Discharge Elimination System: Compilation of Permit Writing Tips and Best Practices*, October 2017, online at https://www.epa.gov/npdes/stormwater-discharges-municipal-sources-resources.

Further, there are areas of the draft permit where minor language changes will result in significant impacts. For example, Springfield requests the "and" be changed back to "or" in Annual Field Screening of Priority Locations (Schedule A.3.c.vi.A) because the "and" in the new permit language does not give permittees the flexibility with which to prioritize their MS4 outfalls for dry weather screening and requires us to use all of the suggested criteria when prioritizing

outfalls. Springfield requests this section be changed back to the 2021 General Permit language to read: "…historical complaints, ~~TMDL and 303(d) List impairments and any identified potential sources of those pollutants in the registrant's jurisdiction, and~~ or other appropriate factors as identified by the permit registrant." Please see the enclosed Detailed Comments by Draft Permit Section for more text edit requests.

5. **Permit Evaluation Report (PER) Explanations**
   Some sections of the PER have not been updated to reflect the new draft permit language. Springfield requests that DEQ thoroughly review the PER and update any sections of the PER associated with changes in the draft MS4 permit with the legal basis and explanation for the new requirements (in particular, sections 4.3.4.6-8, 4.3.5.3.3, 4.3.6.2, etc.). The PER is helpful for interpreting and implementing the requirements of the MS4 permit.

   Where DEQ has added permit requirements that are more stringent than, or in addition to, the six minimum control measures in 40 CFR 122.34, DEQ should provide the specific TMDL analysis that justifies the requirement, or else explain thoroughly why DEQ considers the additional or more stringent requirement to be "needed for water quality protection."

Please consider these comments and requests when revising the draft MS4 Phase II General Permit. Additional requests, edits, and comments on the draft permit and PER are enclosed. Thank you again for the opportunity to provide feedback and work with DEQ to protect water quality.

Sincerely,

Matt Stouder, PE
City of Springfield
Environmental Services Division Director
Phone: 541-736-1006
Email: mstouder@springfield-or.gov

Enclosures:
Detailed Comments by Draft Permit Section
Detailed Comments by PER Section

Schedule A – Effluent Limitations, Conditions, and Stormwater Management Program

A.3.a Public Education and Outreach

A.3.a.i Implementation Dates (Page 12)

Springfield requests that the last sentence be removed from this section. Submittal of a detailed survey is beyond the legal scope of a Phase II permit (see MS4 Phase II Comment Letter).

A.3.a.vi Tracking and Assessment (Page 13)

Assessing behavior change is not clear, specific, or measurable and thus should not be included in a Phase II MS4 permit. Springfield requests that the last sentence in this section be removed from the draft permit, in addition to removing the survey as requested in the MS4 Phase II Comment Letter.

A.3.c IDDE

A.3.c.v.B Response to Complaints or Reports (Page 17)

Springfield requests that the sentence "Illicit discharges that cause exceedances of water quality standards must be reported to DEQ in accordance with Schedule A.1.b." be removed from this section of the draft permit because it is already required by Schedule A.1.b. In addition, this sentence conflicts with the PER page 20 section 4.1.2, which states that the permittee must document and communicate with DEQ an exceedance of an applicable water quality standard **not** already addressed by the IDDE program.

A.3.d Construction Site Runoff Control

A.3.d.ii Ordinance and/or Other Regulatory Mechanism (Page 20)

Springfield requests that the word "prevent" in the draft permit be changed back to "reduce" (as it is in the 2021 General Permit). Completely preventing the discharge of pollutants from construction activities is infeasible.

The last paragraph in this section references enforcement procedures in Schedule A.3.c.iv, which is the illicit discharge enforcement procedures section. It appears this may be a typo and should refer to Schedule A.3.d.vii.

A.3.d.iv.A Erosion and Sediment Control Plans (Page 20)

Springfield requests that the new requirements in (A) be removed "…that includes applicable stages of construction (i.e. demolition, grading, streets and utilities, vertical construction, final stabilization)…with recommended self-inspection intervals and checklists." This language is not consistent with the Phase II Rule requirements.

A.3.d.vi.A.1 Construction Site Inspections (Page 21)

Springfield requests that the inspection frequency be returned to "once during the permit term" as written in the 2021 General Permit. The state has not justified that an increased number of inspections will enhance water quality. Additionally, this requirement is not consistent with the Phase II Rule.

A.3.d.vi.B.2 Construction Site Inspections (Page 21)

Springfield requests that the added language of "…review of any site inspection reports and evaluation of whether inspections are meeting the frequency and detail requirements of the ordinance" be removed because "any" site inspection reports could include DEQ's inspection reports (which are the state's responsibility), and because there is no inspection frequency requirement set by ordinance.

A.3.d.vii Enforcement Procedures (Page 22)

Springfield requests that the last two sentences of this section be removed. The City is responsible for enforcing our own ordinances; we do not rely on DEQ for enforcement: ~~"By November 1, 2027, the procedure must include an explanation of how the registrant will refer noncompliant sites to DEQ if compliance cannot be attained. This explanation must be submitted with the annual report due November 1, 2027."~~

A.3.e Post-Construction Site Runoff for New Development and Redevelopment

A.3.e.ii Ordinance and/or Other Regulatory Mechanism (Page 23)

Enlarge small font in this section because it is unreadable.

A.3.e.ii.B Ordinance and/or Other Regulatory Mechanism (Page 23)

Add an "or" to (B) to read "Comply with post-construction stormwater requirements, including the retention and/or treatment performance standards" because, depending on site constraints, a site could use the treatment performance standard in full or partially.

A.3.e.iii Post-Construction Stormwater Management Requirements (Page 23)

There is no (D) within this section, change the "d" to a "c" at the end of the first sentence "…Schedule A.3.e.iii.a-~~d~~c."

A.3.e.iii.B Performance Standard Technical Feasibility and Site Constraint Exclusions (Page 24)

Change "Feasibility" to "Infeasibility" in the title of this section to more accurately capture the intent of this section.

Remove section (3) "The technical infeasibility and site constraint is not based solely on increased cost." This language is not clear and objective.

A.3.e.v Post-Construction Site Runoff Plan Review (Page 26)

The last sentence of this section "The permit registrant must not approve or recommend for approval any plans for sites or structural controls that do not meet minimum requirements of Schedules A.3.e.iii and A.3.e.iv." is inconsistent with current land use law in the state of Oregon and should be clarified. Under Oregon law, development may be approved, denied, or conditionally approved provided that certain requirements are implemented in the final development. The post-construction requirements are implemented by some local governments into their land use regulations. ORS 197.522(3) requires cities to approve permits and land divisions for the development of housing that are not consistent with the land use regulations, if the applicant proposes conditions of approval that would make the application consistent. The language in schedule A.3.e.v. should be clarified that permittees may approve a site plan

that does not meet the post-construction site runoff requirements if it can be conditioned so that, upon construction, the requirements will be met.

A.3.f Pollution Prevention and Good Housekeeping for Municipal Operations

A.3.f.i Implementation Date (Page 27)

Springfield requests removal of the Winter Maintenance program deadline (see MS4 Phase II Permit Comment Letter).

A.3.f.iii Inspection and Cleaning of the MS4 (Page 27-28)

The new language in this section requires the permittee to maintain "its MS4 and related structures", which is ambiguous. Springfield requests the following language changes: "…must maintain and continue to implement a process for the inspection, maintenance, and cleaning of its MS4 ~~and related structures~~ (~~including, but not limited to,~~ such as catch basins, storm drain inlets, water quality facilities, pipes, etc.) to optimize trash/debris and pollutant removal…"

It is difficult to capture volumetric data from cleaning stormwater pipes. Stormwater pipe cleaning operations occasionally require permits from, or at least a conversation with, DSL prior to commencing work.

See MS4 Phase II Permit Comment Letter for additional comments in this section, including the request for the removal of the language around data collection of the volume of trash/debris removed per catch basin, etc.

A.3.f.iv.D Road and bridge maintenance (Page 29)

Springfield requests that the added language be removed from this section because it is already covered in other areas (road repair and resurfacing, material storage, etc.).

A.3.f.iv.I Building and sidewalk maintenance (Page 29)

Remove the added sentences. There is no legal basis for adding PCB testing of buildings to the general permit. In the PER, only the Lower Columbia Slough has a toxics TMDL (Wood Village). Thus, PCB testing may be applicable to the Wood Village permit, but should not be in the general permit.

A.3.f.viii Litter Control (Page 30)

Springfield does not have a parks department. Willamalane (the Park district in Springfield) is a separate agency and manages parks in the Springfield area. See MS4 Phase II Permit Comment Letter for additional comments in this section.

A.3.f.x Municipal Operations Staff Training (Page 30)

Springfield does not have a parks department. Willamalane is a separate agency (see above) and manages parks in the Springfield area. Drinking water is provided by Springfield Utility Board and Rainbow Water District (not the City). Springfield requests that the 2021 General Permit language be used in this section because it already addresses municipal employee training as applicable to the work they perform.

Schedule B – Monitoring and Reporting Requirements

Schedule B.1 Compliance Evaluation and Adaptive Management (Page 32)

This section includes a new requirement for the permittee to notify DEQ if "requirements of this permit are not being met" and implement corrective measures if so, explained through the Annual Report. This requirement is unclear because it is ambiguous whether this obligation is in addition to the Annual Report (Schedule B.2) and Monitoring Requirements (Schedule B.3), or if it is redundant to them.

Schedule D – Special Conditions

D.2 Definitions

D.2.e Chronic Illicit Discharges (Page 36)

Springfield requests that the definition of chronic illicit discharges be changed back to the definition in the 2021 General Permit because the draft definition is too broad and includes potential (instead of confirmed) illicit discharges. As written in the draft permit, it includes poor housekeeping practices, intermittent discharges, and inconclusive findings of outfall investigations, all of which are potential illicit discharges.

D.2.h Construction Activity (Page 36)

Springfield requests that the added words "…grubbing, stumping, demolition…" in the draft permit be removed from this section because it makes the definition of "Construction Activity" too broad (this could include stump grinding, blackberry removal, etc.). DEQ has not provided any legal basis for adding in these new activities.

D.2.p Green Infrastructure (GI) (Page 37)

Include "filter" in the definition "…stormwater harvest and reuse, or landscaping to store, infiltrate, filter, or evapotranspirate stormwater and reduce flows to sewer systems or to surface waters" to account for treatment options. Verify that this is consistent with the EPA definition to ensure consistency at the federal level.

3.1 Condition 1 – Entities Eligible for Coverage (Page 18)

Small font needs to be enlarged in this section.

4.3.1.3 Education on Construction Site Control Measures (Page 25)

This section does not match the draft permit, which now includes education on post-construction. This section does not explain the legal basis or rationale for adding it.

4.3.4.6 Construction Site Inspections (Page 34)

This section was not updated to explain the legal basis behind the draft permit language.

4.3.5 Post-Construction Site Runoff Control (Page 38)

Throughout this section, there are references to Low Impact Development which have been removed in the draft permit.

Small font needs to be enlarged in this section.

4.3.5.2 Ordinance and/or Other Regulatory Mechanism (Page 40)

The sentence "Similarly, the City of Springfield currently uses portions of the City of Eugene's Phase I permit requirements relating to the construction and maintenance of stormwater treatment facilities as modified for conditions specific to Springfield" is not accurate; Springfield no longer refers to the Eugene Stormwater Manual for design and requests this sentence be removed.

The paragraph "Additionally, the Willamette Basin Bacteria and Mercury TMDLs require the City of Springfield to establish post-construction design features to reduce bacteria and mercury in all new development and public work projects to reduce the loadings of these TMDL pollutants. These design features include surface infiltration, treatment and/or filtering of surface water runoff and LID techniques such as rain gardens, infiltration swales, and rainwater harvesting. The City of Springfield provides criteria to use when designing stormwater systems using LID approaches. These criteria include maximizing the amount of runoff infiltrated to the greatest extent practicable, utilizing riparian setbacks and other landscaped areas on the development site for stormwater treatment and infiltration where practical, and using public open space areas with sufficient capacity to infiltrate additional runoff to accommodate development sites adjacent to public open space." is not relevant to the MS4 permit, thus Springfield requests that it be removed.

4.3.5.3 Stormwater Treatment Performance Standard (Page 43)

The last paragraph in this section is verbatim language from the draft permit. It does not explain the rationale for requiring a technical memorandum supporting the treatment performance standard that links the specifications and application of allowable structural controls to pollutant removal efficiency for TMDL and impairment pollutants. Springfield requests that this language be removed from both the PER and the draft permit.

4.3.5.5 Post-Construction Site Runoff Plan Review (Page 46)

This section should refer to the registrant's threshold for post-construction (not construction).

4.3.6.2 Operation and Maintenance Strategy for Existing Structural Stormwater Controls (Page 48)

This should now refer to Schedule A.3.e.iii (not iv).

4.3.6.5 Requirements for Winter Operations & Maintenance Programs, Pesticide and Fertilizer Applications, Litter Control, and Materials Disposal (Page 49)

It is the permit authority's responsibility to determine water quality issues, not the permittee's responsibility. Springfield requests that the Winter Operations & Maintenance Program section be removed from the PER. See MS4 Phase II Comment Letter.

4.3.7 Industrial Site Screening (Page 50-51)

Springfield requests this section be removed because it is the state's responsibility to screen and administer 1200z permits. See MS4 Phase II Permit Comment Letter.

State of Oregon
Department of
Environmental
Quality

www.oregon.gov/DEQ;
Search "MS4"

GENERAL PERMIT
National Pollutant Discharge Elimination System
Municipal Separate Storm Sewer Systems
Phase II General Permit
Public Notice Draft

Oregon Department of Environmental Quality
Stormwater Program
700 NE Multnomah St., Suite 600
Portland, OR 97232

Issued pursuant to ORS 468B.050 and Section 402 of the federal Clean Water Act.

Registered to:

Major Receiving Streams:

Wasteload/Load Allocations (if any):

Sources Covered By This Permit:

This permit authorizes regulated small municipal separate storm sewer systems to discharge stormwater to surface waters of the state, in accordance with the requirements, limitations and conditions set forth herein.

DRAFT	DRAFT	July 1, 2026
Jennifer Wigal Water Quality Division Administrator	Issuance Date	Effective Date

PERMITTED ACTIVITIES

Until this permit expires or is modified or revoked, the permit registrant is authorized to discharge municipal stormwater to surface waters of the state only in conformance with the requirements, limitations and conditions set forth in the following schedules. Where conflict exists between specific conditions (found in Schedules A-D) and general conditions (Schedule F), the specific conditions supersede the general conditions.

Unless specifically authorized by this permit, by regulation issued by EPA, by another National Pollutant Discharge Elimination System (NPDES) permit, a Water Pollution Control Facilities (WPCF) permit, or by Oregon Administrative Rule (OAR), any other direct or indirect discharges to waters of the state are prohibited, including discharges to an underground injection control system.

TABLE OF CONTENTS

LIST OF TABLES

APPLICABILITY AND NOTIFICATION REQUIREMENTS

1. Entities Eligible for Coverage

Entities eligible for coverage under this permit are regulated owners or operators of small municipal separate storm sewer systems (MS4s) that discharge stormwater from their MS4 to surface waters of the state.

2. Permit Coverage Area

The permit applies to the geographic area served by the regulated small MS4 jurisdiction that is located fully, or partially, within an Urbanized Area or Urban Area with a population of 50,000 or more people in the State of Oregon as defined by the Year 2000, Year 2010, or the Year 2020 Decennial Census conducted by the U.S. Census Bureau. If the small MS4 is not located entirely within an Urbanized/Urban Area described above, only the portion that is within the Urbanized/Urban Area is considered the minimum permit coverage area. Permit coverage areas for Counties or special districts must at a minimum cover all areas within Census-designated Urban/Urbanized Areas and Urban Growth Boundaries around or adjacent to permitted MS4 communities.

Though the Census Bureau's delineation of Urbanized and Urban Areas with greater than 50,000 people may differ from Decennial Census to Census, any small MS4 area or parcel that has ever been identified as either by the U.S. Census Bureau remains part of the regulated MS4 Permit Coverage Area under this permit unless the MS4 operator requests and DEQ grants a waiver from MS4 permitting pursuant to 40 CFR § 122.32.

3. Eligibility Requirements

Regulated small MS4 owners or operators (hereafter referred to as operators or permit registrants) listed below are covered by this NPDES MS4 stormwater discharge general permit. These registrants submitted complete renewal applications, and are therefore not required to submit an application for coverage under this permit. Hereafter the following regulated small MS4s are referred to as registrants:

i. City of Albany
ii. City of Ashland
iii. City of Central Point
iv. City of Corvallis
v. City of Grants Pass
vi. City of Keizer
vii. City of Medford
viii. City of Millersburg
ix. City of Philomath
x. City of Rogue River
xi. City of Springfield
xii. City of Troutdale

xiii. City of Turner

xiv. City of Wood Village

xv. Benton County

xvi. Josephine County

xvii. Lane County

xviii. Linn County

xix. Marion County

xx. Polk County

xxi. Rogue Valley Sewer Services - Co-Implementers (City of Central Point, City of Eagle Point, City of Phoenix, City of Talent, Jackson County, Rogue Valley Sewer Services)

4. Individual Permit

If coverage under this permit is denied or revoked, the permit registrant is unable to meet the terms and conditions of this permit, or the permit registrant does not wish to be regulated by this permit, the permit registrant must cease discharge or apply for an individual permit in accordance with Oregon Administrative Rule 340-045-0030.

DEQ may refuse to authorize or may revoke coverage under this permit and require the MS4 operator to apply for an individual NPDES MS4 permit as set forth in OAR 340-045-0033(10) and related rules. If that occurs, DEQ will notify the applicant or registrant in writing that an individual permit is required and follow the procedures set forth in rule.

5. Discharge Authorization

When permit coverage is granted, DEQ will notify the permit applicant that the permit has been granted and that discharge is authorized.

6. Application Requirements

Any new registrant seeking authorization to discharge under this permit must submit a complete application to DEQ as outlined below.

a. **Application Deadlines**

After the effective date of the general permit, new registrants that DEQ determines need permit coverage must submit a complete application for coverage under this permit no later than 60 days after the date of DEQ's notification, unless DEQ authorizes a later date.

b. **Application Form and Fee**

The NPDES MS4 Phase II General Permit application form (see Appendix A) must be completed and signed in accordance with Schedule F. The application submittal must include the application fee and annual fee for the first year of permit coverage according to OAR 340-045-0075, Table 70H.

Applications must be submitted via DEQ's Your DEQ Online (YDO) system.

c. **Co-Applicants Under a Single Permit Application**

A co-applicant is any small MS4 operator applying for this permit, in a cooperative agreement with at least one other applicant. Co-applicants must own or operate a small MS4 within or in proximity to another regulated small MS4.

A small MS4 operator may seek to obtain coverage under this permit as a co-applicant with one or more small MS4s eligible for this permit. In this instance, a single joint application, that includes all required information and certification signatures for each co-applicant, must be submitted to DEQ. See Schedule A.2 for permit registrant's responsibilities. Cooperative agreements between co-applicants must be documented andprovided to DEQ upon request.

7. Renewal Requirements

If the permit registrant intends to continue to operate under this permit after the permit expiration date, the permit registrant must submit a complete renewal application along with all other required documents to DEQ at least 180 days prior to permit expiration. DEQ will notify the permit registrant if the renewal application has been approved or denied.

8. Electronic System Use Requirement

Permit registrants must submit all required documents and payments using DEQ's electronic reporting system (Your DEQ Online; YDO) when directed to do so. Permit registrants unable to submit reports electronically (for example, those who do not have an internet connection) must contact DEQ to request a waiver. DEQ will notify the registrant in writing if an electronic waiver request is approved or denied.

Permit registrants who obtain a waiver not to use DEQ's electronic reporting system must use the reporting forms provided to them by DEQ, if applicable, and an additional fee may be assessed. DEQ may limit the duration of approved waivers from electronic reporting.

SCHEDULE A - EFFLUENT LIMITATIONS, CONDITIONS, AND STORMWATER MANAGEMENT PROGRAM

1. Authorized Discharges

Subject to the terms and conditions of this permit, the permit registrant is authorized to discharge municipal stormwater to surface waters of the state from its MS4, within the defined permit coverage area.

This permit also conditionally authorizes discharges from the permit registrant's MS4, which are categorized as allowable non-stormwater discharges in Schedule A.1.d.

a. **Requirement to Reduce the Discharge of Pollutants**

Pursuant to 40 CFR §122.34(a), the permit registrant must at a minimum develop, implement, and enforce a Stormwater Management Program (SWMP) designed to reduce pollutants from the MS4 to the maximum extent practicable, to protect water quality and to satisfy the applicable water quality requirements of the Clean Water Act. This permit identifies the management practices, control techniques and systems, and design and engineering methods necessary to meet this standard.

b. **Water Quality Standards**

Compliance with all permit requirements is deemed compliance with applicable water quality standards established in OAR 340-041.

If the permit registrant or DEQ determines that the permit registrant's MS4 discharge is causing or contributing to an exceedance of an applicable water quality standard based on site-specific credible evidence, the permit registrant must take the following corrective actions:

i. Within 48 hours of becoming aware of or being notified of the exceedance, the permit registrant must begin to investigate the cause of the exceedance;

ii. Within 30 days of becoming aware of the exceedance, the permit registrant must notify DEQ in writing of the exceedance (for on-going or continuing exceedances, a single written notification will fulfill this requirement); and

iii. Within 60 days of becoming aware of or being notified of the exceedance, the permit registrant must submit a report to DEQ that documents the following:

(A) The results of the investigation, including the date the exceedance was discovered or the date the permit registrant was notified by DEQ;

(B) A description of the conditions that are known or suspected to have caused or contributed to the exceedance; and

(C) Corrective actions taken or planned, including the date corrective action was completed or is expected to be completed.

DEQ will review the report submitted and either approve it or require modifications. The permit registrant must implement the corrective action(s) in accordance with the schedule approved by DEQ. DEQ may require a timeline and enforceable milestones for completion of the corrective action plan. The details of all corrective actions implemented under Schedule A.1.b.iii must be included in the subsequent annual report.

If the exceedance is due to an illicit discharge and the permit registrant confirms the required response per Schedule A.3.c.v(B) occurred, the requirements listed in Schedule

A.1.b. are not required, though the details of the illicit discharge and response must be included in the next annual report.

If the permit registrant determines that the exceedance is already being addressed by actions associated with the implementation of a Total Maximum Daily Load, the permit registrant shall submit a report to DEQ with the next annual report that documents the following:

i. The results of the investigation, including the date the exceedance was discovered;

ii. A description of the conditions that are known or suspected to have caused or contributed to the exceedance; and

iii. The applicable TMDL requirements that are being implemented.

The details of all corrective actions implemented associated with Schedule A.1.b.iii must be included in the subsequent annual report.

c. **Limitations of Coverage**

The permit does not authorize:

i. Stormwater discharges associated with industrial activities [as defined in 40 CFR §122.26(b)(14)] or stormwater associated with construction activities [as defined in 40 CFR §122.26(b)(14)(x) and (b)(15)]. Such discharges are regulated through DEQ's NPDES Industrial Stormwater General Permits and DEQ's NPDES Construction Stormwater General Permits, or another appropriate NPDES permit.

ii. Stormwater discharges to underground injection control (UIC) systems. Such discharges are regulated by DEQ's UIC program, perOAR Chapter 340, Division 44 and as authorized under 40 CFR §144-146.

d. **Allowable Non-Stormwater Discharges**

The permit does not authorize the discharge of non-stormwater from the MS4, except where such discharges satisfy one of the following conditions:

i. The non-stormwater discharge is regulated under a separate NPDES permit.

ii. The non-stormwater discharge originates from emergency firefighting activities.

iii. The non-stormwater discharge is categorized as an authorized or allowable non-stormwater discharge listed below:

(A) Uncontaminated water line flushing.

(B) Landscape irrigation. For permit registrant owned or operated areas landscape irrigation will be considered allowable only if pesticides and fertilizers are applied in accordance with the manufacturer's instructions.

(C) Diverted stream flows.

(D) Uncontaminated groundwater infiltration (as defined in 40 CFR § 35.2005(20)) to separate storm sewers.

(E) Rising groundwaters.

(F) Uncontaminated pumped ground water.

(G) Potable water sources (including potable groundwater monitoring wells and draining and flushing of municipal potable water storage reservoirs).

(H) Startup flushing of groundwater wells.

(I) Foundation, footing and crawlspace drains (where flows are not contaminated [i.e., process materials or other pollutant]).

(J) Uncontaminated air conditioning or compressor condensate.

(K) Irrigation water.

(L) Springs.

(M) Lawn watering.

(N) Individual residential car washing.

(O) Charity car washing (provided that chemicals, soaps, detergents, steam or heated water are not used. Washing is restricted to the outside of the vehicle, no engines, transmissions or undercarriages).

(P) Flows from riparian habitats and wetlands.

(Q) Dechlorinated swimming pool discharges including hot tubs (heated water must be cooled for at least 12 hours prior to discharge).

(R) Fire hydrant flushing.

(S) Street and pavement washwaters (provided that chemicals, soaps, detergents, steam or heated water are not used).

(T) Routine external building wash-down (provided that chemicals, soaps, detergents, steam or heated water are not used), except for registrant-owned buildings constructed or renovated between 1950 and 1980, as described in Schedule A.3.f.iv.I.

(U) Water associated with dye testing activity.

(V) Discharges of treated water from investigation, removal and remedial actions selected or approved by DEQ pursuant to ORS Chapter 465.

(W) Any other discharge deemed as de minimis by DEQ.

If any of these allowable non-stormwater discharges are or become a significant source of pollutants, the permit registrant must prohibit that discharge or require implementation of appropriate BMPs to reduce the discharge of pollutants associated with the source before discharge to the MS4.

2. Permit Registrant's Responsibilities

Each permit registrant is responsible for permit compliance related to their permit coverage area, or where this permit requires the specific permit registrant to take an action.

a. Coordination Among Registrants and Joint Agreements

i. If MS4 operators elect to submit a joint application, each co-registrant is jointly responsible for permit compliance. If a single MS4 operator elects to submit an application for multiple registrants (commonly referred to as co-implementers),

the sole applicant is solely responsible for permit compliance for each of the co-implementers.

ii. A permit registrant may elect to work with or delegate implementation of one or more stormwater management program control measures to another permit registrant or entity. The permit registrant remains responsible for compliance with any permit conditions that another permit registrant or entity fails to implement.

iii. If a permit registrant elects to work with or delegate implementation of one or more Stormwater Management Program control measures to another permit registrant or entity, there must be a written agreement between the permit registrant and the other permit registrant or entity memorializing the delegation. This agreement must be provided to DEQ upon request.

b. **Maintain Adequate Legal Authority**

The permit registrant must adopt, update, and maintain adequate legal authority through ordinance(s), code(s), interagency agreement(s), contract(s), and/or other mechanisms to control pollutant discharges into and discharges from its MS4 and to implement and enforce the conditions of this permit, to the extent allowable pursuant to the respective authority granted under state law.

If existing ordinances or regulatory mechanisms are insufficient to meet the criteria required by this permit, the permit registrant must update and adopt appropriate legal mechanisms to maintain adequate legal authority no later than September 1, 2028. If the permit registrant does not have the authority to adopt ordinances, the permit registrant must utilize all relevant regulatory mechanisms available to it as allowed pursuant to applicable state law.

c. **Stormwater Management Program (SWMP) Document**

The permit registrant must maintain a written Stormwater Management Program Document (referred to as the SWMP Document), that describes in detail the specific actions the permit registrant uses to comply with this permit, including each of the Stormwater Management Program Control Measures requirements in Schedule A.3. If any requirement of this permit is being fulfilled by another entity in accordance with Schedule A.2.a, the SWMP Document must describe how the requirement is being fulfilled and refer to or include any written agreements describing each party's role. The SWMP Document must describe, link, or refer to publicly available documents detailing the permit registrant's schedule for implementation of any control measure components during the term of this permit.

The permit registrant must review the SWMP Document annually and, if necessary, update it in accordance with the requirements of Schedule B.1. The SWMP Document must be maintained over the course of the permit term and must describe programs and BMPs or refer to publicly available documents detailing the permit registrant's schedules for implementation of any control measure components during the term of this permit.

The permit registrant must make the SWMP Document available to the public through its publicly accessible website. The Stormwater Management Program Document currently in effect at the time of this permit renewal must be implemented until the new SWMP Document has been adopted.

d. **Stormwater Management Program Information and Metrics**

The permit registrant must maintain a method of gathering, storing, tracking, reviewing, and using SWMP information to set priorities and assess its compliance with the conditions of the permit. Permit registrants must track activities and review implementation of control measures, and document the assessment in order to illustrate status and progress on implementing the SWMP control measures (e.g., the number of inspections, official enforcement actions, and/or types of public education actions, etc.) and to facilitate adaptive management.

e. **Stormwater Management Program Resources**

The permit registrant must provide finances, staff, equipment and/or other support capabilities to implement the control measures and other requirements outlined in this permit.

3. Stormwater Management Program Control Measures

The permit registrant must implement all control measures identified in this section and reflected in their SWMP Document. For new or additional SWMP Control Measures required by this permit, the permit registrant must begin to revise their existing control measures as needed, and update the SWMP Document accordingly by the implementation deadline specified in Table 1 below.

Any new registrant authorized to discharge after the effective date of this permit must fully implement all applicable SWMP control measures in accordance with the implementation schedule established in their discharge authorization letter.

Table A1: New Control Measures Implementation Schedule

SWMP Control Measures	Implementation Deadline
Public Education and Outreach	Survey a priority audience once in the permit term for adaptive management per Schedule A.3.a.vi
Public Involvement and Participation	No new permit conditions
Illicit Discharge Detection and Elimination	No new permit conditions
Construction Site Runoff Control	Update to enforcement procedures, inspection frequency, and ESCP review process by November 1, 2027, if necessary
Post-Construction Site Runoff for New Development and Redevelopment	Technical memorandum per Schedule A.3.e.iii by November 1, 2027
Pollution Prevention and Good Housekeeping for Municipal Operations	Update to Inspection & Cleaning Program and implementation of Winter Operations & Maintenance Program by November 1, 2028
Industrial Site Screening	Program implementation by November 1, 2028

a. **Public Education and Outreach**

The permit registrant must conduct an ongoing education and outreach program to inform the public about the impacts of stormwater discharges on waterbodies and the steps they can take to reduce pollutants in stormwater runoff. The education and outreach program must be designed to address stormwater issues of significance within the permit registrant's community and meet the following requirements.

i. Implementation Dates

Upon the effective date of this permit unless otherwise noted, registrants must implement the required components described in Schedule A.3.a.ii-vi. Once in the permit term, municipal or special district permit registrants (i.e., non-County registrants) qualifying as Large Communities as defined in Schedule D.2. must conduct a detailed survey of a priority audience as detailed in Schedule A.3.a.vi.

ii. Education and Outreach Program

The permit registrant's public education and outreach program must include educational efforts targeting the audiences listed in Schedule A.3.a.iv and Schedule A.3.a.v. The goal of the education and outreach program is to reduce behaviors and practices that cause or contribute to adverse stormwater impacts on receiving waters. The program should promote specific actions to increase audience understanding of how to reduce pollutant discharges in stormwater runoff and prevent illicit discharges from entering the MS4 and impacting receiving waters.

To be considered adequate, the public education and outreach program must include the activities in Schedule A.3.a.iii-vi below.

iii. Stormwater Education Activities

The permit registrant must distribute or offer at least two (2) educational messages or activities per year.

Educational messages or activities may include printed materials (for example, brochures or newsletters); electronic materials (for example, social media, websites or e-newsletters); mass media (for example, utility bill inserts, transit advertisements, newspaper articles or public service announcements); focused workshops; and/or other educational events or formats.

The permit registrant may use existing materials if applicable. The permit registrant may develop its own educational materials and means of delivering its message(s). Based on the priority audience's demographic, the permit registrant must consider delivering its selected messages and/or activities in an appropriate manner and in language(s) other than English.

iv. Priority Audiences and Topics

The permit registrant must conduct education and outreach to priority audiences identified below at least once during the permit term. The permit registrant must focus efforts on conveying relevant messages using the priority topics identified below or stormwater issues of significance in their community.

(A) Priority Audiences:

1. General public, including renters and homeowners, homeowner associations, schoolchildren, or businesses (home-based and mobile business).
2. Local officials, including elected officials, land use planners and engineers.

(B) Priority Topics:

1. Impacts of illicit discharges on receiving waters and how to report them.
2. Impacts from impervious surfaces and appropriate techniques to avoid adverse impacts.
3. Best management practices for proper use, application and storage of pesticides and fertilizers.
4. Best management practices for pet waste, litter, and trash control.
5. Best management practices for recycling programs.
6. Best management practices for power washing, car washing, carpet cleaning, and auto repair and maintenance.
7. Low-impact development/green infrastructure.
8. Septic systems, information pertaining to maintenance of septic systems.
9. Watershed awareness and how storm drains lead to local creeks and rivers, and potential impacts to fish and other wildlife.
10. Stormwater issues of significance identified by permit registrant, including those related to TMDLs or impairment pollutants.

v. Education on Construction Site Control Measures and Post-Construction Requirements

At least twice during the permit term, the permit registrant must conduct educational outreach directed at developers and construction site operators working within their community (that is, at least once for each group). Topics should include appropriate selection, design, installation, use and maintenance of construction site control measures required by the permit registrant's relevant ordinances or other regulatory mechanisms for the construction group, as well as post-construction planning and local code requirements for the developer group.

vi. Tracking and Assessment

The permit registrant must track implementation of the public education and outreach requirements. In each corresponding annual report, the permit registrant must assess their progress toward implementation of the program, including an evaluation of reach and impact within the reporting timeframe for the associated annual report. Additionally, at least once in the permit term, municipal or special district permit registrants (i.e., non-County registrants) qualifying as Large Communities as defined in Schedule D.2.v must conduct a survey of at least one of the priority audiences regarding at least one of the priority topics to assess the reach and effectiveness of the program. These assessments should be used with

other tracking measures to inform future stormwater education and outreach efforts to convey the educational material most effectively to the priority audience(s).

b. **Public Involvement and Participation**

The permit registrant must implement a public involvement and participation program that provides opportunities for the public to effectively participate in the development of the SWMP control measures. The permit registrant must comply with public notice requirements when implementing a public involvement and participation process.

i. Implementation Dates

Upon the effective date of this permit unless otherwise noted, registrants must implement the required components described in Schedule A.3.b.ii-iv.

ii. Publicly Accessible Website

The permit registrant must maintain and promote at least one publicly accessible website with information on the permit registrant's SWMP implementation, the SWMP Document, contact information, and educational materials. The website must be maintained with current information and be updated at least annually. The permit registrant's website must incorporate the following:

(A) Illicit Discharge Complaint or Report requirements (see Schedule A.3.c.v).

(B) Draft documents issued for public comment, final reports, plans and other official SWMP policy documents.

(C) Links to all ordinances, policies and/or guidance documents related to the construction and post-construction stormwater management control programs, including education, training, and permitting.

(D) The permit registrant's contact information for relevant staff, including phone numbers, mailing addresses and email addresses.

iii. Public Involvement Opportunity

The permit registrant must, at a minimum, create or partner in the development of one stewardship or public involvement opportunity during the permit term. The permit registrant may consider one of the following stewardship opportunities or a more locally relevant opportunity:

(A) Watershed enhancement volunteer activities (trash pickup, tree planting, etc.),

(B) Storm drain marking/stenciling,

(C) Volunteer water quality? monitoring,

(D) Riparian plantings/facility enhancement,

(E) Neighborhood low-impact development activities,

(F) Adopt-A-Road,

(G) Community advisory committee, or

(H) Other locally relevant opportunities.

iv. Tracking and Assessment

The permit registrant must track implementation of the public involvement and participation requirements. In each corresponding annual report, the permit registrant must assess their progress towards implementation of the program.

c. **Illicit Discharge Detection and Elimination**

The permit registrant must implement and enforce a program to detect and eliminate illicit discharges into the MS4, to the extent allowable by state laws. An illicit discharge is any discharge to an MS4 that is not composed entirely of stormwater. Conditional exceptions are identified in Schedule A.1.d.

i. Implementation Dates

Upon effective date of this permit unless otherwise noted, registrants must implement all of the required components described in Schedule A.3.c.ii-viii.

ii. MS4 Map

(A) MS4 Map and Digital Inventory

The permit registrant must maintain a current map of their MS4. The MS4 map and digital inventory must include the location of outfalls and an outfall inventory, conveyance system and structural stormwater control locations, and chronic illicit discharges (see Schedule A.3.c.ii.B-D). The permit registrant must delineate their MS4 by storm sewer drainage basin, as appropriate, and identify the location and characteristics of any ongoing dry weather flows.

(B) Outfall Inventory

The permit registrant must maintain an inventory of all the known outfall locations owned or operated by the permit registrant. The outfall location must include a unique identifier (for example, alphanumeric code identifier), any geographic information (for example, streets, manholes, or milepost markers) necessary to locate these outfalls in the field, and the name(s) of the receiving water(s).

(C) Conveyance System and Structural Stormwater Control Locations

The permit registrant must maintain a map of the MS4 collection system and all known structural stormwater controls. Where applicable, features must include a unique identifier (for example, alphanumeric code identifier) and any geographic information (for example, streets, manholes, or milepost markers) necessary to locate these features in the field.

(D) Chronic Illicit Discharges

If applicable, the permit registrant must include the location(s) of known chronic illicit discharge(s).

Registrants must maintain and update their MS4 map as needed. All existing maps and digital inventories (including GIS data layers) must be publicly published or shared with DEQ upon request.

iii. Ordinance and/or Other Regulatory Mechanisms

The permit registrant must prohibit non-stormwater discharges into the MS4 (except those conditionally allowed by Schedule A.1.d) through enforcement of an ordinance or other regulatory mechanism, to the extent allowable under state law. The permit registrant must implement appropriate enforcement procedures

and actions to ensure compliance. The ordinance or other regulatory mechanism must also define the types of illicit discharges it prohibits. The ordinance or other regulatory mechanism does not need to specifically list every prohibition if, at a minimum, each of the following is broadly addressed by the ordinance or other regulatory mechanism:

(A) Septic, sewage, and dumping or disposal of liquids or materials other than stormwater into the MS4;

(B) Discharges of washwater resulting from the hosing or cleaning of gas stations, auto repair garages, or other types of automotive services facilities;

(C) Discharges resulting from the cleaning, repair, or maintenance of any type of equipment, machinery, or facility, including motor vehicles, cement-related equipment, and port-a-potty servicing, etc.;

(D) Discharges of washwater from mobile operations, such as mobile automobile or truck washing, steam cleaning, power washing, and carpet cleaning, etc.;

(E) Discharges of washwater from the cleaning or hosing of impervious surfaces in municipal, industrial, commercial, or residential areas (including parking lots, streets, sidewalks, driveways, patios, plazas, work yards and outdoor eating or drinking areas, etc.) where detergents are used and spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed);

(F) Discharges of runoff from material storage areas, which contain chemicals, fuels, grease, oil, or other hazardous materials from material storage areas;

(G) Discharges of pool or fountain water containing chlorine, biocides, or other chemicals; discharges of pool or fountain filter backwash water;

(H) Discharges of sediment, unhardened concrete, pet waste, vegetation clippings, or other landscape or construction-related wastes;

(I) Discharges of trash, paints, stains, resins, or other household hazardous wastes; and

(J) Discharges of food-related wastes (grease, restaurant kitchen mat and trash bin washwater, etc.).

iv. Enforcement Procedures

The permit registrant must continue to implement and maintain their written escalating enforcement and response procedure. The procedure must address repeat violations through progressively stricter responses, as needed to achieve compliance. The escalating enforcement and response procedure must describe how the permit registrant will use enforcement techniques to ensure compliance. The enforcement procedures must include timelines for compliance and, when formulating response procedures, must consider relevant factors such as the amount of pollutant discharged, the type of pollutant discharged, and whether the discharge was intentional or accidental.

v. Program to Detect and Eliminate Illicit Discharges

At a minimum, the permit registrant's program must include the following activities:

(A) Illicit Discharge Complaints or Reports

The permit registrant must publicize a phone number, webpage, and/or other communication channel that the public can use to report illicit discharges. The complaint/reporting communication channel must be answered or responded to by trained staff during normal business hours and must include a system to record or capture incoming complaints or reports during non-business hours.

(B) Response to Complaints or Reports

The permit registrant must respond to all complaints or reports of illicit discharges to the permitted MS4, as soon as possible, or within an average of two working days from the initial time of the permit registrant's knowledge of the complaint or report, unless there is a threat to human health, welfare, or the environment. For discharges, including spills, which constitute a threat to human health, welfare, or the environment, the permit registrant must respond within 24 hours of the permit registrant's knowledge of the threat. Spills, or other illicit discharges, that may endanger human health or the environment must be reported in accordance with all applicable federal and state laws, including notification to the Oregon Emergency Response System (800-452-0311). Illicit discharges that cause exceedances of water quality standards must also be reported to DEQ in accordance with Schedule A.1.b. For discharges of pollutants to waters of the state that are outside the permit registrant's enforcement authority, the registrant must submit a pollution complaint to DEQ in writing within 5 days.

The permit registrant's complaint response and the associated field investigation must at minimum, use the following timelines:

1. Initial Investigation or Evaluation

   Conduct an initial investigation within an average of five working days or refer the complaint to the appropriate agency (see Schedule A.3.c.v.C below).

2. Ongoing Illicit Discharges

   If the elimination of an identified illicit discharge will take more than 15 working days due to technical, logistical, or other reasonable issues, the permit registrant must within 20 working days of identifying the source, initiate procedures to eliminate the illicit discharge.

   Upon confirmation of an illicit connection, the permit registrant must use the enforcement procedures in a documented effort to eliminate the illicit connection within six months to the extent allowable under state law. All known illicit connections to the MS4 must be eliminated.

3. Ongoing Illicit Discharges involving Capital Improvements

   If the elimination of the illicit discharge involves the repair or replacement of the permit registrant's wastewater or storm sewer conveyance systems, the permit registrant must remove the source of the illicit discharge within three years of the date of its

identification unless the permit registrant receives approval from DEQ for a different timeframe that is based on project-specific information and documentation of best efforts to meet the three-year timeframe.

(C) Notification of Other Authorities

If the illicit discharge originates outside the permit registrant's jurisdictional authority or discharges to another jurisdictional authority, the permit registrant must notify the jurisdictional authority as expeditiously as possible and no later than within five working days of becoming aware of the illicit discharge.

(D) Complaints Tracking

The permit registrant must maintain a procedure or system to document all complaints or reports of illicit discharges into and from the MS4. The tracking system must document, at minimum the following:

1. Date the complaint was received and, if available, the complainant's name and contact information.
2. Name of staff responding to the complaint.
3. Date the investigation was initiated.
4. The outcome of the staff investigation.
5. Corrective action(s) taken to eliminate the illicit discharge.
6. The responsible party for the corrective action(s).
7. The status of enforcement procedure(s), when necessary.
8. The date the corrective action(s) was completed and staff that evaluated final compliance.

Complaint tracking information must be summarized in each annual report.

vi. Dry Weather Screening Program

At a minimum, the permit registrant must conduct dry weather screening of at least 20 percent of their MS4 outfalls every year. Once all known outfalls are inspected, or if all the known outfalls have been previously screened, the permit registrant must identify and document priority locations. The 20 percent annual field screening must thereafter include a portion of the permit registrant's identified priority locations.

(A) Annual Field Screening of Priority Locations

Priority locations must, when possible, be located at an accessible location downstream of any source of suspected illicit discharge as identified by the permit registrant. Priority location designations must be based on analysis of risk of potential for illicit discharge(s), accounting for factors such as hydrological conditions, percent of impervious surface area, total drainage area of the location, population density of the location, infrastructure access density, traffic density, development age (age of the infrastructure and structures or buildings in the area), history of the area, land use types, personnel safety, accessibility, historical complaints, or other appropriate factors as identified by the registrant.

The dry-weather field screening activities must occur after a dry period of at least 72-hours. The dry-weather field screening activities must be documented and include:

(B) General Observations

General observations must include visual presence of flow, turbidity, oil sheen, trash, debris or scum, condition of conveyance system or outfall, color, odor and any other relevant observations related to the potential presence of non-storm water or illicit discharges.

(C) Field Screening and Analysis

If flow is observed, and the source is unknown, a field analysis must be conducted to determine the cause of the dry-weather flow. The field analysis must include sampling for pollutant parameters that are likely to be found based upon the suspected source of discharge or by other effective investigatory approaches or means to identify the source or cause of the suspected illicit discharge. Where appropriate, field screening pollutant parameter action levels, identified by the permit registrant, must be considered.

(D) Pollutant Parameter Action

The permit registrant must develop or identify pollutant parameter action levels to be used as part of the field screening. The pollutant parameter action levels and rationale must be documented in an enforcement response plan (or similar document) or in the SWMP Document. The permit registrant may use the following as indicator constituents: ammonia, biochemical oxygen demand, pH, total chlorine, detergents as surfactants, E. coli, total phosphorus, turbidity, temperature, and total suspended solids.

Registrants must continue to implement their existing pollutant parameter action procedures.

(E) Laboratory Analysis

If general observations and field screening indicate an illicit discharge and the presence of a suspected illicit discharge cannot be identified through other investigatory methods, the registrant must collect a water quality sample for laboratory analysis for ongoing discharges. The water quality sample must be analyzed for pollutant parameters or identifiers that will aid in the determination of the source of the illicit discharge. The types of pollutant parameters or identifiers may include, but are not limited to genetic markers, industry-specific toxic pollutants, or other pollutant parameters that may be specifically associated with a source type.

vii. Illicit Discharge Detection and Elimination Training and Education

The permit registrant must ensure that all persons responsible for investigating and eliminating illicit discharges and illicit connections into the MS4 are appropriately trained to conduct such activities. All staff directly responsible for conducting dry weather screening activities or responding to reports of illicit discharges and spills into the MS4 must be properly trained to conduct such activities.

The permit registrant must provide orientation and training to all new staff working to implement the Illicit Discharge Detection and Elimination program within 30 days of their assignment to this program. All staff must receive training at least once during the permit term. The permit registrant must provide follow-up training as procedures or technology utilized in this program change.

viii. Tracking and Assessment

The permit registrant must track implementation of the Illicit Discharge Detection and Elimination program requirements. In each corresponding annual report, the permit registrant must assess their progress towards implementation of the program.

d. **Construction Site Runoff Control**

The permit registrant must implement and enforce a construction site runoff control program to prevent discharges of construction-related pollutants from regulated construction sites in its coverage area.

i. Implementation Dates

Upon effective date of this permit unless otherwise noted, registrants must implement all of the required components described in Schedule A.3.d.ii-ix. An update to enforcement procedures is due by November 1, 2027, per Schedule A.3.d.vii.

ii. Ordinance and/or Other Regulatory Mechanism

Through ordinance or other regulatory mechanism, to the extent allowable under state law, the permit registrant must prevent the discharge of pollutants from construction activities into the MS4. This ordinance or other regulatory mechanism must require erosion controls, sediment controls, and waste materials management controls to be used and maintained at all qualifying construction projects according to the thresholds below, from initial commencement of construction activities through final stabilization, to prevent pollutants in stormwater discharges to the MS4.

(A) For Large Communities, the qualifying threshold for projects is a minimum land disturbance of 7,000 square feet or more; and

(B) For Small Communities, the qualifying threshold for projects is a minimum land disturbance of 10,890 square feet (a quarter of an acre) or more.

The permit registrant must require construction site operators for qualifying sites to complete and implement an Erosion and Sediment Control Plan (ESCP) as described in Schedule A.3.d.iv. The registrant must also use the enforcement procedures developed in accordance with Schedule A.3.d.vii, and other appropriate actions to ensure compliance with Schedule A.3.d.ii-vi.

iii. Compliance with Other NPDES Permits

Construction projects that disturb one or more acres (or disturb less than one acre but are part of a "common plan of development or sale" disturbing one or more acres) are subject to the 1200-C, 1200-CA, or 1200-CN NPDES General Permits in addition to the to the permit registrant's construction site runoff control requirements identified in this permit (Schedule A.3.d.iv). Registrants must refer projects subject to the 1200-C to DEQ or the appropriate DEQ agent.

iv. Erosion and Sediment Control Plans

The permit registrant must maintain written specifications that address the proper installation and maintenance of such controls during all phases of construction activity occurring in their coverage area for all qualifying sites according to the thresholds in Schedule A.3.d.ii above. At a minimum, the written specifications must include an ESCP template for construction site operators to document how erosion, sediment, and waste material management controls will be implemented at the site. At a minimum, through ordinance or other regulatory mechanism the permit registrant must:

(A) Provide the construction site operator an ESCP template that includes applicable stages of construction (i.e. demolition, grading, streets and utilities, vertical construction, final stabilization) prior to commencement of construction/land disturbance, with recommended self-inspection intervals and checklists;

(B) Require construction site operator to complete a site-specific ESCP prior to commencement of construction/land disturbance;

(C) Require the ESCP be maintained and updated as site conditions change, or as needed; and

(D) Require ESCPs to be kept on site and made available for review by the permit registrant, DEQ, or another administrating entity.

v. Erosion and Sediment Control Plans Review

The permit registrant must review all ESCPs according to the assigned thresholds described in Schedule A.3.d.ii, (including those that are part of a "common plan of development or sale" disturbing one or more acres) to determine compliance with the ordinance or other required regulatory mechanism starting no later than November 1, 2027. The registrants must conduct ESCP reviews using a standardized process, such as a checklist or equivalent tool, and must consider site-specific factors including, but not limited to, steep slopes, proximity to surface waters, and the presence of contaminated soil or groundwater.

vi. Construction Site Inspections

The permit registrant must inspect construction sites to ensure compliance with Schedule A.3.d.iii-iv. If any updates in inspection practices are required by this section they must be incorporated into the SWMP Document no later than November 1, 2027.

(A) Minimum Triggers for Inspection

At a minimum, the permit registrant must inspect construction sites if:

1. The construction activity will result in land disturbance of one or more acres (or that disturb less than one acre, if it is part of a "common plan of development or sale" disturbing one or more acres). No later than by November 1, 2027, the registrant must inspect each site at least twice during the permit term (initial and during active construction);
2. Sediment is visible or reported in stormwater discharge or dewatering activities from the construction site; or

3. A complaint or report is received. At minimum, the permit registrant must respond to the initial complaint if more than one report or complaint is received.

(B) Minimum Inspection Documentation Requirements

Each site inspection must, at a minimum, include and document the following:

1. An assessment of the ESCP to verify whether the specified control measures have been implemented, are being properly maintained, and effectively prevent pollution discharges from the site.
2. An assessment of the site's compliance with the permit registrant's ordinances or requirements, including review of any available or required site self-inspection reports and evaluation of whether inspections are meeting any frequency and detail requirements of the ordinance..
3. Visual observations and documentation of any existing or potential non-stormwater discharges, illicit connections, and/or discharge of pollutants from the site (including track-out, fugitive dust, and turbid discharges).
4. If necessary, education or instruction provided to the construction site operator related to additional stormwater pollution prevention practices to comply with the approved ESCP. Requirements or recommendations for follow-up actions must also be documented.
5. A written or electronic inspection report, including documentation of ordinance or other regulatory mechanism non-compliance and other implementation deficiencies, as well as any necessary follow-up actions (i.e., re-inspection, enforcement) to ensure compliance with their applicable requirements.

(C) Inspection Requirements for Large Community Registrants

In addition to Schedule A.3.d.vi.A, Large Communities as defined in Schedule D.2 must inspect at least 50% of the qualifying new construction sites that disturb less than one acre at least once during the permit term to ensure compliance with the site's ESCP.

vii. Enforcement Procedures

The permit registrant must develop, implement, and maintain a written escalating enforcement and response procedure for all qualifying construction sites. This procedure must describe how repeat violations will be addressed through progressively stricter actions, as needed, to achieve compliance. It must also specify the enforcement methods the registrant will use and include defined timelines for reaching compliance.

When applying these procedures, the registrant must consider factors such as the type and quantity of pollutants discharged, and whether the discharge was intentional or accidental.

By November 1, 2027, the procedure must include adoption of a policy or SOP describing circumstances under which the registrant will refer noncompliant sites to DEQ for enforcement. This policy or SOP must be submitted with the annual report due November 1, 2027.

viii. Construction Runoff Control Training and Education

The permit registrant must ensure that all staff responsible for ESCP reviews, site inspections, and enforcement of the permit registrant's requirements are properly trained and qualified to conduct such activities.

The permit registrant must provide orientation and training to all new staff working to implement the construction runoff control program within 90 days of their assignment to this program. The staff must be properly trained and knowledgeable in the technical aspects of erosion, sediment, and waste material management controls to conduct such ESCP reviews and inspections (Certified Erosion and Sediment Control Lead [CESCL] or other equivalent technical training at a minimum), as well as possess understanding of relevant MS4 permit requirements and local code or ordinance relating to construction and the escalating enforcement procedures. All staff must receive training at least once during the permit term. The permit registrant must provide follow-up training as procedures and/or technology utilized in this program change.

ix. Tracking and Assessment

The permit registrant must track implementation of the construction site runoff program's required activities. In each corresponding annual report, the permit registrant must assess their progress toward implementing the construction site runoff program's control measures.

e. **Post-Construction Site Runoff for New Development and Redevelopment**

Permit registrants must continue to implement and enforce their post-construction stormwater pollutant control program that meets the requirements of Schedule A.3.e to reduce discharges of pollutants in stormwater runoff from new development and redevelopment project sites in its coverage area.

All registrants must describe their programs in the SWMP Document.

i. Implementation Deadline

Permit registrants must continue to implement all required components of Schedule A.3.e.i – A.3.e.viii, and no later than November 1, 2027, must submit the technical memorandum as described in Schedule A.3.e.iii.

ii. Ordinance and/or Other Regulatory Mechanism

The permit registrant must enact, implement and enforce an ordinance or other regulatory mechanism, to the extent allowable under state and federal law, that requires project sites within the MS4 area that create or replace an impervious surface area equal to or surpassing permit registrant's assigned threshold area, to achieve the following:

(A) Develop and implement a site-specific stormwater management approach and related site plan to manage stormwater runoff,

(B) Comply with the post-construction stormwater requirements, including retention and/or treatment performance standards, and

(C) Implement long-term operation and maintenance of structural stormwater controls.

The assigned threshold area is 10,890 square feet (a quarter of an acre) for "small community" County registrants, and 5,000 square feet for all other permit registrants. The permit registrant must document and implement enforcement procedures and actions designed to ensure ongoing compliance with Schedule A.3.e.

iii. Post-Construction Stormwater Management Requirements

The permit registrant must apply enforceable requirements to all applicable new development and redevelopment project sites in accordance with the stormwater retention and treatment performance standards in Schedule A.3.e.iii.A-C, which prioritize retention first, treatment where retention targets cannot be met, and alternative compliance options where treatment is infeasible, as described below.

(A) Stormwater Retention Performance Standard

The permit registrant must identify and implement a stormwater retention performance standard that targets predevelopment hydrologic function (e.g., runoff volume control, peak runoff rate control, flow frequency/duration control, and water quality control), prioritizes onsite retention of stormwater using infiltration, capture and reuse and/or evapotranspiration, and minimizes offsite discharges of runoff and associated pollutants.

The stormwater retention performance standard must identify a numeric stormwater retention requirement (NSRR) using one of the following approaches:

1. Volume-based method (e.g., the first inch of each storm event).
2. Storm event percentile-based method (e.g., the 95th percentile storm event- 95% of the time the data is below this value).
3. Annual average runoff-based method (e.g., 80% of annual average runoff).
4. An alternative approach that provides equal or comparable results as the other methods (e.g., flow duration matching). Local requirements and thresholds must demonstrate the requirements of this section are met, including ensuring a similar level of protection of receiving waters and that the associated onsite retention and pollutant removal will be achieved.

The permit registrant must require stormwater runoff generated on the post-construction project site be retained with a stormwater structural control.

(B) Retention Performance Standard Technical Infeasibility and Site Constraint Exclusions

The permit registrant must ensure that the stormwater retention standard is met on the project site unless the following conditions are met:

1. The permit registrant identifies and documents the review criteria and factors used to determine technical infeasibility and/or site constraints, which may include, but are not limited to, shallow bedrock, high groundwater, groundwater contamination, soil instability as documented by geotechnical analysis, land use that is inconsistent with capture and infiltration of stormwater;
2. The permit registrant reviews the site-specific stormwater management approach and determines that technical infeasibility and/or site constraint exist; and
3. The technical infeasibility and site constraint is not based solely on increased cost.

For the purposes of this section, designing a site to utilize an existing or concurrently designed regional stormwater management facility for retention and/or treatment is considered onsite compliance, provided that the regional facility was designed with sufficient additional capacity to accommodate the development, and that the facility's anticipated pollution reduction per design specifications meets the requirements of the treatment performance standard.

(C) Stormwater Treatment Performance Standard

For retention performance standard approaches A.3.e.iii.(A)1. through A.3.e.iii.(A)3., the permit registrant must identify and apply a quantitative stormwater treatment performance standard that ensures that when the entire NSRR runoff volume is not fully retained on a project site, at a minimum, the remaining NSRR runoff volume is treated prior to discharges from the project site. Green infrastructure as a technique must be prioritized.

For retention performance standard approach A.3.e.iii.(A).4., the registrant must identify and apply a quantitative stormwater treatment performance standard that treats stormwater prior to discharge from the project site. Again, green infrastructure as a technique must be prioritized.

With respect to the two previous paragraphs, the stormwater treatment performance standard must include, at a minimum, the following requirements:

1. Stormwater runoff is treated by a stormwater structural control.
2. The stormwater structural control is designed to remove a defined percentage of total suspended solids and may include an upper and lower bound to the treatment requirement that reflect the practical limitation of an engineered control (e.g., 80% removal of TSS for typical influent concentrations ranging from 100mg/L to 200mg/L).
3. A description of all allowable structural controls, including the following for each of the stormwater structural controls: site-specific design requirements that do not inhibit maintenance,

conditions where each structural control applies, and operation and maintenance standards for the structural control.

Additionally, regardless of which of the four-retention performance standard approaches are used, the permit registrant must complete a technical memorandum supporting the treatment performance standard that links the specifications and application of allowable structural controls described in (3) above to the expected pollutant removal efficiency for TMDL and Category 4 and 5 impairment pollutants. This technical memorandum is to be submitted to DEQ no later than November 1, 2027, and must be thereafter cited or referred to in the SWMP Document with descriptions of other post-construction measures.

iv. Offsite Alternative Compliance

For projects unable to fully meet the retention performance standard options and/or treatment standard alternative, and that meet the Performance Standard Technical Infeasibility and Site Constraint Exclusions above in Schedule A.3.e.iii.(C), the permit registrant may choose to allow offsite alternatives. The offsite alternatives must account for retention or treatment at least equal to the retention and treatment performance standards not met onsite.

A written technical justification must be provided for implementing offsite alternative compliance. The written technical justification must be in the form of a site-specific hydrologic or design analysis conducted and endorsed by an Oregon registered Professional Engineer or Oregon Certified Engineering Geologist. In order to approve alternative compliance projects, the permit registrant must identify and implement an enforceable offsite alternative compliance option that results in a similar level pollutant removal achieved by the applicable onsite retention and treatment performance standard.

The offsite alternative compliance option must be within the same subwatershed as the site undergoing development, and must include institutional standards and management systems to value, estimate, account for and track how these mitigation projects address the unmet stormwater control needs (including the how the performance standards are met) achieved through the offsite mitigation.

The offsite alternative compliance option may include, but is not limited to, the following:

(A) Stormwater payment-in-lieu or alternative financing program

(B) Offsite Mitigation, which may include meeting the retention requirement offsite via a UIC, the use of a stormwater mitigation banking program, or offsite treatment.

(C) Offsite Groundwater Replenishment Projects that are protective of groundwater quality and that the permit registrant has determined will provide an opportunity to replenish regional groundwater supplies.

v. Post-Construction Site Runoff Plan Review

The permit registrant must review the site plans for all project sites required to develop and implement a site-specific stormwater management approach. The

permit registrant must implement written review procedures that ensure consistency with the registrant's post-construction stormwater requirements, and the permit registrant must not approve or recommend for approval any site plans that do not meet these requirements.

vi. Long-Term Operation and Maintenance (O&M)

The permit registrant must maintain an inventory and implement a strategy to ensure that all structural stormwater controls installed in compliance with this permit are operated and maintained to meet the post-construction stormwater management requirements in Scheduled A.3.e.iii or A.3.e.iv. This strategy must, at minimum, include the following:

(A) Documented efforts to obtain legal authority to allow the permit registrant to inspect and require effective operation and maintenance of privately owned and operated structural stormwater controls that discharge to the MS4, to the extent allowable under state and federal law.

(B) Inspection procedures and an inspection schedule ensuring compliance with the O&M requirements of each structural stormwater control operated by the permit registrant and by other private entities.

(C) A tracking mechanism for documenting inspections and the O&M requirements for structural stormwater controls. This tracking mechanism must document enforcement actions and compliance response. For structural stormwater controls that include vegetation, the O&M requirements must at minimum include requirements to maintain and/or replace vegetation to ensure the functionality of the control. For structural stormwater controls that include soils in the treatment process, O&M requirements must at minimum include requirements to maintain soil permeability.

(D) Reporting requirements for privately owned and operated structural stormwater controls that document compliance with O&M requirements.

(E) The location of all public and private structural stormwater controls installed in compliance with this permit must be included with the MS4 Map.

vii. Training and Education

The permit registrant must ensure that staff responsible for performing post-construction runoff site plan reviews, administrating post-construction program requirements and performing O&M practices or evaluating compliance with long-term O&M requirements are trained or otherwise qualified to conduct such activities.

The permit registrant must provide orientation and training to all new staff working to implement the post-construction runoff control program within 30 days of their assignment to this program. All staff working to implement the post-construction runoff control program must receive training at least once during the permit term. Permit registrant must provide follow-up training as procedures and/or technology utilized in this program change.

viii. Tracking and Assessment

The permit registrant must maintain records for activities conducted to meet the requirements of the Post-Construction Site Runoff program and include a descriptive summary of their activities in the corresponding Annual Report.

f. **Pollution Prevention and Good Housekeeping for Municipal Operations**

The permit registrant must properly operate and maintain its facilities, using prudent pollution prevention and good housekeeping to reduce the discharge of pollutants through the MS4 to waters of the state.

i. Implementation Date

Upon the effective date of this permit unless otherwise noted, registrants must implement all of the required components described in Schedule A.3.f.ii-xi. By November 1, 2027, registrants must implement the Winter Maintenance program described in Schedule A.3.f.vi.

ii. Operation and Maintenance Strategy for Existing Structural Stormwater Controls

For existing structural stormwater controls installed or permitted by the permit registrant prior to the effective date of this permit, the permit registrant must implement an operation and maintenance strategy for both permit registrant-owned controls and controls owned and operated by other entities discharging to the permit registrant's MS4 without an NPDES discharge permit. The O&M strategy for existing structural stormwater controls must meet the long-term O&M requirements in Schedule A.3.e.vi but not the site performance standards outlined in Schedule A.3.e.iii.

iii. Inspection and Cleaning of the MS4

The permit registrant must maintain and continue to implement a process for the inspection, maintenance, and cleaning of its MS4 and related structures (including, but not limited to, catch basins, storm drain inlets, water quality facilities, pipes, culverts, etc.). This process should be designed to optimize trash/debris and pollutant removal, and verify proper operation of all its municipal structural treatment controls designed to reduce pollutants (including floatables) in storm water discharges to or from its MS4 and related drainage structures. By November 1, 2028, the SWMP Document description of adopted operation and maintenance activities must include, at a minimum, the following:

(A) Inspections of the MS4 and related structures;

(B) Cleaning of the MS4 and related structures to ensure they operate as designed; and,

(C) Proper disposal of materials removed from cleaning of the MS4.

The permit registrant must maintain records of inspection and cleaning activities to facilitate adaptive management, including but not limited to such metrics as: an estimated volume of trash/debris removed during O&M activities per catch basin or as a total or by category or type of activity, if known; number of structures of each category inspected; number of structures of each category cleaned; and linear feet of pipe cleaned.

The inspection, maintenance, and cleaning schedule must ensure inspection of at least 50% of the registrant owned or operated catch basins and inlets within the MS4 at least once every five years. An alternate schedule designed to increase efficiency of removal of pollutants from the MS4 based on field records may be adopted if approved by DEQ and may replace the requirement for at least 50% at least once every five years, provided the registrant continues to take all appropriate maintenance or cleaning actions based on those inspections to ensure the catch basins and inlets continue to function as designed.

The permit registrant may establish an inspection prioritization system for its catch basins and other structural MS4 elements, and adjust inspection frequency as needed for adaptive management, provided the registrant describes all relevant factors it uses to prioritize its inspections to specific geographic or land use areas of its MS4 in the SWMP Document or another document cited/referenced therein no later than November 1, 2028.

iv. Pollution Prevention in Facilities and Operations

The permit registrant must conduct its municipal O&M activities in a manner that prevents the discharge of pollutants through the MS4 to protect water quality. The permit registrant must continue to implement, review, and if necessary, update procedures for inspection and maintenance schedules to ensure pollution prevention and good housekeeping practices are conducted for the following activities:

(A) Pipe cleaning for stormwater and wastewater conveyance systems.

(B) Cleaning of culverts conveying stormwater in roadside ditches.

(C) Ditch maintenance.

(D) Road and bridge maintenance, including road mark painting, sidewalks, and ancillary infrastructure work that may involve concrete work around water, electrical or other utility lines peripheral to the MS4 system.

(E) Road repair and resurfacing including pavement grinding.

(F) Dust control for roads and municipal construction sites.

(G) Winter road maintenance, including salt or de-icing storage areas.

(H) Fleet maintenance and vehicle washing.

(I) Building and sidewalk maintenance, including washing. For buildings owned by the registrant and built or renovated between 1950 and 1980, exterior building washdown or demolition shall not be conducted in such a way as to allow discharge into the MS4 or receiving waters unless a building material assessment for PCBs has been conducted and found negative. Permit registrant-owned structures confirmed or suspected to have PCB-containing materials shall not discharge washdown to the MS4, and PCB-containing demolition wastes shall be disposed of properly.

(J) Solid waste transfer and disposal areas.

(K) Municipal landscape maintenance.

(L) Material storage and transfer areas, including fertilizer and pesticides, hazardous materials, used oil storage, and fuel.

(M) Firefighting training activities.

(N) Maintenance of municipal facilities including public parks and open space, golf courses, airports, parking lots, swimming pools, marinas, etc.

v. Registrant-owned NPDES Industrial Stormwater Permit Facilities

Permit registrant-owned or -operated facilities with industrial activity as defined in 40 CFR §122.26(b)(14) discharging stormwater to the waters of the state must have coverage under DEQ's NPDES Industrial Stormwater General Permit. The permit registrant may use the actions required in the NPDES Industrial Stormwater Permit to address the applicable facility requirements in Schedule A.3.f.iv.

vi. Winter Operations & Maintenance Program

By November 1, 2027, the registrant must document and include with (or reference) in the SWMP Document their Winter Maintenance and Operations Program for public roads under the registrant's control, or cooperative agreement with others, that limits impacts to water quality to the degree practicable when considering public safety.

(A) Winter Management Materials

The registrant must ensure that all winter materials utilized by the registrant on roads for anti-icing and de-icing purposes (e.g., abrasives, sand, deicers including but not limited to MgCl2, solid salt, etc.) are utilized and stored properly, according to most current required and generally accepted practices.

(B) Winter Maintenance Strategy

The registrant must provide or reference a Winter Maintenance Strategy with the SWMP Document. This document must describe how the registrant manages rights-of-way owned or operated by the registrant during inclement weather and what Best Management Practices are implemented. This strategy must be submitted with the Annual Report due November 1, 2028.

(C) Winter Maintenance Tracking and Reporting

A description of Winter Maintenance activities for streets and roads must be included as a regular element of the MS4 Annual Report required by this permit beginning in the Annual Report due November 1, 2028. The description must include but need not be limited to: a list of materials used in winter maintenance, number of winter weather events where winter maintenance materials were used, quantities and general location of each material used, and any other actions taken to protect waters of the state during winter maintenance activities.

vii. Requirements for Pesticide and Fertilizer Applications

The permit registrant must implement practices to reduce the discharge of pollutants to the MS4 associated with the permit registrant's application and storage of pesticides and fertilizers. At a minimum, such areas include the permit registrant's public rights-of-way, parks, recreational facilities, golf courses, and landscaped areas. All employees or contractors of the permit registrant applying pesticides must follow all label requirements, including those regarding application methods, rates, number of applications allowed, avoidance of

application near surface waters as appropriate, and disposal of the pesticide, fertilizer, and rinsate.

viii. Litter Control

The permit registrant must implement methods to reduce litter within its jurisdiction, and must incorporate data collected from available sources (e.g., MS4 maintenance and cleaning activities, parks and event management data, pollution complaint reporting of litter dumping, etc.) into decision making and adaptive management. The permit registrant may work cooperatively with other departments, organizations, or other entities to control litter on a regular basis and after major public events, in order to reduce the discharge of pollutants and litter to the MS4.

ix. Materials Disposal

All collected material, wastes, or pollutants removed in the course of maintenance, treatment, control of stormwater, or other wastewaters must be managed and disposed of in a manner to prevent such pollutants from entering the waters of the state in accordance with state and federal rules.

x. Municipal Operations Staff Training

The permit registrant must ensure that staff responsible for evaluating O&M practices, evaluating compliance with long-term O&M requirements or ensuring pollution prevention at facilities and during operations are trained or otherwise qualified to conduct such activities.

The permit registrant must provide MS4 orientation and pollution prevention training to all new staff working in municipal operations programs within 30 days of starting their assignment and at least once during the permit term. At a minimum, this includes O&M and field staff for public works, environmental services, road crews, parks departments, and water departments. The permit registrant must provide follow-up training as procedures and/or technology utilized in this program change.

xi. Tracking and Assessment

The permit registrant must maintain records for activities conducted to meet the requirements of the pollution prevention and good housekeeping for municipal operations program requirements and include a descriptive summary of their activities in the corresponding annual report.

g. **Industrial Site Screening**

The permit registrants must implement a program to document facilities in their jurisdiction that are or may be subject to the NPDES 1200-Z industrial stormwater discharge permit. Required program elements include:

i. Implementation Date

Upon the effective date of the permit, all registrants must begin establishing programs to implement all of the required components described in Schedule A.3.g.ii-iii. All required elements must be fully implemented no later than November 1, 2028.

ii. Screening

Permit registrants must conduct a one-time screening drawing on available information to evaluate industrial facilities that may discharge to their MS4 to assess whether they may be subject to the 1200-Z permit.

iii. Notification

Permit registrants must create a list of the likely/potential 1200-Z facilities in their jurisdiction and submit the information on the listed facilities to DEQ with the annual report following the screening event through the YDO system.

SCHEDULE B - MONITORING AND REPORTING REQUIREMENTS

1. Compliance Evaluation & Adaptive Management

At least once per year, the permit registrant must evaluate their programs for effectiveness and for compliance with the requirements of this permit using the DEQ annual report template. This self-evaluation must include assessment of progress toward implementing the SWMP control measures in Schedule A, and implementation of actions to comply with any additional requirements identified pursuant to Schedule D.1 (Requirements for Discharges to Impaired Waterbodies). The compliance evaluation must be reported each year using the DEQ annual report template. If the permit registrant determines that any requirements of this permit are not being met, the permit registrant must inform DEQ in writing and with the subsequent annual report, and develop and implement a plan to correct.

With the compliance evaluation, the registrant must also conduct an adaptive management assessment of effectiveness of efforts within at least two of the SWMP control measures in Schedule A, and include a description of any updates to the SWMP Document resulting from the adaptive management process in the annual report. The adaptive management assessment must include a review of tracking measures or data collected on stormwater program implementation, assessment of options available to achieve greater reductions in stormwater pollutants within the "Maximum Extent Practicable" (MEP) framework, and a plan for improvements in implementation and/or data collection in one or more component or task of each of the two control measures assessed.

2. Annual Report

No later than November 1 each year, beginning in 2026, the permit registrant must submit an annual report to DEQ. The permit registrant must use the annual report form provided by DEQ. The reporting period for the annual report is from July 1 of a given calendar year through June 30 of the following calendar year (for example, July 1, 2025 through June 30, 2026 would be the reporting period for the annual report due November 1, 2026). The permit registrant must make all annual reports available to the public, including any required documents attached to the annual report, through the permit registrant's maintained website.

DEQ may extend the due date for the annual report in the event of extraordinary circumstances including, but not limited to, pandemic, wildfire, earthquake, flood, or other natural disaster provided the permit registrant requests an extension in writing and provides all documentation available regarding the specific reasons why the November 1 deadline cannot be met. In that circumstance, DEQ will respond to the extension request in writing and will document any revised annual report due date when applicable.

3.

3. Monitoring Requirements

If the permit registrant discharges to a waterbody for which a TMDL has been approved or is listed on the 303(d) list, the permit registrant must comply with all monitoring requirements under Schedule D.1. In addition, if the permit registrant performs municipal stormwater monitoring at outfall locations in the receiving waterbody or to demonstrate compliance with this permit, all monitoring data must be submitted to DEQ.

a. When the permit registrant conducts stormwater monitoring, it must meet the following requirements:

i. Samples and measurements taken for the purpose of monitoring must be representative of the monitored activity.

ii. Sample collection, preservation, and analysis must be conducted according to methods and procedures outlined in 40 CFR § 136, unless otherwise approved by DEQ. Where an approved 40 CFR § 136 method does not exist, and other test procedures have not been specified, any available method may be used after approval from DEQ.

b. Records of monitoring information must include:

i. The date, exact place, and time of sampling or measurements.

ii. The names(s) of the individual(s) who performed the sampling or measurements.

iii. The date(s) analyses were performed.

iv. The names of the individuals who performed the analyses.

v. The analytical techniques or methods used.

The results of such analyses must be summarized in the annual report and uploaded/submitted to DEQ in the DEQ-provided electronic data submission template.

4. Submissions

The permit registrant must provide DEQ with an electronic copy of the annual report and any supplemental information required by November 1 each year. Registrants must submit all required documents and payments using DEQ's electronic reporting system: Your DEQ Online (YDO).

5. Recordkeeping

a. Records Retention

The permit registrant must retain records and copies of all information (for example, all monitoring, calibration, and maintenance records; all original strip chart recordings for any continuous monitoring instrumentation; copies of all reports required by this permit; annual reports; a copy of the NPDES permit; and, records of all data or information used in the development and implementation of the SWMP) for a period of at least five years from the start of the permit compliance action date or for the term of this permit, whichever is longer. This period may be extended at the request of DEQ at any time.

b. Availability of Records

The permit registrant must submit records to DEQ when requested. The permit registrant must also make all records described above available to the public, if requested to do so in writing. The public must be able to view the records during normal business hours.

SCHEDULE C - COMPLIANCE CONDITIONS AND DATES

Compliance conditions and dates are not included at this time.

SCHEDULE D - SPECIAL CONDITIONS

1. Requirements for Discharges to Impaired Waterbodies

a. **Applicability**

The requirements of this section apply to MS4 discharges to receiving waters with established TMDLs and with new or modified TMDLs approved by EPA before the effective date of the permit where urban stormwater is identified as a source of TMDL pollutant loading. Schedule D.1 also applies to MS4 discharges to receiving waters identified as impaired on DEQ's current Integrated Report and 303(d) list for particular pollutants, identified before the effective date of the permit. DEQ has identified receiving waters in all urban areas covered by this permit as being water quality impaired for a variety of pollutants and most of these receiving waters are also under a TMDL load allocation. Established TMDLs in the permit registrant's coverage area are noted on the coverage page of this permit.

b. **TMDL and 303(d) Evaluation**

The permit registrant must:

i. Review the applicable pollutants that are Category 4 and 5 on the most recent Integrated Report's 303(d) list prior to issuance of this permit, or the most recent USEPA list if approved within three years of the issuance date of this permit, and the TMDLs that are relevant to the registrant's MS4 discharges. Based on this review of the applicable TMDLs and most current 303(d) list at the time, evaluate whether there is a reasonable likelihood for stormwater from the MS4 to cause or contribute to water quality degradation of receiving waters.

ii. Evaluate whether the BMPs in the existing SWMP Document, grouped by control measure, are effective in addressing and reducing the applicable TMDL and 303(d) pollutants. If the registrant determines that the BMPs in the existing SWMP Document are ineffective in addressing and reducing the applicable pollutants, the registrant must describe how the SWMP will be modified or updated to address and reduce these pollutants to the maximum extent practicable.

iii. Submit a report summarizing the results of the review and evaluation and identify any modifications or updates to the SWMP Document that are necessary to reduce applicable pollutants to the maximum extent practicable by November 1, 2029.

c. **Performance Measures**

DEQ incorporated performance measures in Schedule A.3.c, d, e, f, and g to address water quality impairments, 303(d) listed pollutants, and EPA approved TMDL allocations issued to date. Compliance with the permit's terms and conditions is deemed compliance with applicable water quality standards as established in OAR 340-041, and provides reasonable assurance that the registrant will progress over the course of the permit term toward attainment of TMDL allocations issued before the effective date of this permit, unless specified below.

2. Definitions:

a. **Total Maximum Daily Load (TMDL)** is a clean water plan that details a science-based approach to cleaning up polluted water so that it meets state water quality standards. A

TMDL calculates a numerical value that represents the highest amount of a pollutant a surface water body can receive and still meet the standards. As used in this permit, reference to a TMDL or applicable TMDL is any TMDL which has been approved by EPA on or before the issuance date of this permit.

b. **Best Management Practices (BMPs)** means schedules of activities, prohibition of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the state. BMPs also mean treatment requirements, operating procedures, and practices to control runoff, spillage, or leaks, sludge, or waste disposal, or drainage from raw material storages. See 40 CFR § 122.2 and 122.44(k). For the purposes of this permit, BMPs are synonymous with structural and non-structural stormwater controls and include the schedule of activities, controls, prohibition of practices, maintenance procedures and other management practices designed to prevent or reduce pollution.

c. **Bioretention** means the water quality and water quantity stormwater management practice using the chemical, biological and physical properties of plants, microbes and soils for the removal of pollution from stormwater runoff.

d. **CFR** means the Code of Federal Regulations, which is the official annual compilation of all regulations and rules promulgated during the previous year by the agencies of the United States government, combined with all the previously issued regulations and rules of those agencies that are still in effect.

e. **Chronic Illicit Discharges** are continuous or repeated/intermittent illicit discharges to an MS4 potentially resulting from sanitary/wastewater connections to an MS4, sanitary/wastewater inflows into an MS4, unpermitted industrial wastewater discharges to the MS4, or other types of illegal dumping or poor housekeeping practices upstream from an outfall where irregular flows, color, smell, or other monitoring parameters indicate an issue that may need repeat investigations over time to ensure cross connections or illegal dumping are remedied. Chronic illicit discharges may not be long-term and ongoing as in the case of illicit connections that can be stopped easily. Chronic illicit discharges may be defined by inconclusive findings of outfall investigations indicating pollutant discharge or repeated reports by members of the public that have not been traced back to a definite source.

f. **Clean Water Act (CWA)** refers to what was formally called the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972, Public Law 92-500, as amended by Public Law 95-217, Public Law 95-576, Public Law 96-483, and Public Law 97-117, 33 U.S.C. § 1251 et seq. [40 CFR §122.2].

g. **Common Plan of Development** means a contiguous construction project or projects where multiple separate and distinct construction activities may be taking place at different times on different schedules but under one plan.

h. **Construction Activity** includes, but is not limited to, clearing, grading, excavating, grubbing, stumping, demolition, and other site preparation work or land disturbance activities. Construction activity does not include routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original purpose of the facility as defined in 40 CFR 122.26(b)(15).

i. **Control Measure**, as used in this permit, refers to any action, activity, stormwater control, or other method used to control the amount of pollutants in MS4 discharges.

j. **Discharge of a pollutant** means any addition of any "pollutant" or combination of pollutants to "waters of the state" from any "point source," or any addition of any pollutant or combination of pollutants to the waters of the "contiguous zone" or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation. This definition includes additions of pollutants into waters of the state from surface runoff, which is collected or channeled by man; discharges through pipes, sewers, or other conveyances owned by a State, municipality, or other person, which do not lead to a treatment works; and discharges through pipes, sewers, or other conveyances, leading into privately owned treatment works. This term does not include an addition of pollutants by any "indirect discharger" [40 CFR §122.2].

k. **Erosion** is the process of carrying away soil particles by the action of water, wind, or other process.

l. **Erosion and Sediment Control Plan (ESCP)** is a site-specific plan designed to describe the control of soil, raw materials, or other substances to prevent pollutants in storm water runoff. For the purposes of this permit, an ESCP means a document that identifies potential sources of pollution, describes practices to reduce pollutants in stormwater discharges from the site, and identifies procedures or controls that the operator will implement to reduce impacts to water quality and comply with applicable permit requirements.

m. **Evaporate** is rainfall that is changed or converted into a vapor.

n. **Evapotranspiration** is the sum of evaporation and transpiration of water from the earth's surface to the atmosphere. It includes evaporation of liquid or solid water plus the transpiration from plants.

o. **Final Stabilization** is determined by satisfying the following criteria: (1) there is no reasonable potential for discharge of a significant amount of construction related sediment or turbidity to surface waters; (2) construction materials and waste have been removed and disposed of properly. This includes any sediment that was being retained by the temporary erosion and sediment controls; (3) all temporary erosion and sediment controls have been removed and disposed of properly, unless doing so conflicts with local requirements; (4) all soil disturbance activities have stopped and all stormwater discharges from construction activities that are authorized by this permit have ceased; (5) all disturbed or exposed areas of the site are covered by either final vegetative stabilization or permanent stabilization measures. However, temporary or permanent stabilization measures are not required for areas that are intended to be left unvegetated or unstabilized following construction (such as dirt access roads, utility pole pads, areas being used for storage of vehicles, equipment, or materials), provided that measures are in place to eliminate or minimize erosion.

p. **Green Infrastructure (GI)** is a specific type of stormwater control using vegetation, soils, and/or natural processes to manage stormwater. At the scale of a neighborhood or site, green infrastructure refers to stormwater management systems designed to mimic nature by reducing and/or storing stormwater through infiltration, evaporation, and

transpiration. At the site level, such measures may include the use of plant or soil systems, permeable pavement or other pervious surfaces or substrates, stormwater harvest and reuse, or landscaping to store, filter, infiltrate, or evapotranspirate stormwater and reduce flows to sewer systems or to surface waters. At the scale of city or county, green infrastructure refers to the patchwork of natural areas that provides flood protection and natural processes that remove pollutants from stormwater.

q. **Impaired Water** means any waterbody that does not meet applicable water quality standards for one or more parameters as identified on Oregon's 303(d) list.

r. **Infiltration** is the process by which stormwater penetrates into soil.

s. **Illicit Connections** include, but are not limited to, pipes, drains, open channels, or other conveyances that have the potential to result in an illicit discharge.

t. **Illicit Discharge** is any discharge to a municipal separate storm sewer system that is not composed entirely of stormwater except discharges authorized under Section A.1.d, discharges permitted by a NPDES permit or other state or federal permit, or otherwise authorized by DEQ.

u. **Impervious Surface** is any surface resulting from development activities that prevents the infiltration of water. Common impervious surfaces include building roofs; traditional concrete or asphalt paving on walkways, driveways, parking lots, gravel lots and roads; and heavily-compacted earthen materials.

v. **Large Community** is defined as any permit registrant not defined as a Small Community.

w. **Maintenance Activities**, as used in the definition of Redevelopment means activities such as pavement preservation projects; restoration of impervious surfaces disturbed by construction, maintenance or repair utilities; and roof replacement projects.

x. **Major municipal separate storm sewer outfall (or "major outfall")**, per 40 CFR 122.26(b)(5) means a municipal separate storm sewer outfall that discharges from a single pipe with an inside diameter of 36 inches or more or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a drainage area of more than 50 acres); or for municipal separate storm sewers that receive storm water from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 2 acres or more).

y. **Maximum Extent Practicable (MEP)** is the technology-based discharge standard for municipal separate storm sewer systems to reduce pollutants in storm water discharges that was established by Section 402(p)(3)(B)(iii) of the Clean Water Act [33 U.S.C §1342(p)(3)(B)(iii)].

z. **Minimize** means to reduce and/or eliminate to the extent achievable using control measures (including BMPs) that are technologically available, economically practicable, and achievable in light of best industry or municipal practices.

aa. **Municipal Separate Storm Sewer System (MS4)** is defined in 40 CFR §122.26(b) and means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of the Clean Water Act that discharges to waters of the state; (ii) Designed or used for collecting or conveying storm water; (iii) Which is not a combined sewer; and (iv) Which is not part of a Publicly Owned Treatment Works as defined at 40 CFR §122.2.

bb. **Municipality** means a city, town, borough, county, parish, district, association, or other public body created by or under state law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of the Clean Water Act.

cc. **National Pollutant Discharge Elimination System (NPDES)** is the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of Clean Water Act [40 CFR §122.2].

dd. **Non-structural Stormwater Controls** are stormwater controls in the form of development standards or other regulatory mechanisms intended to minimize and treat stormwater by minimizing impervious surfaces and by using soil infiltration, evaporation, and transpiration. These controls may also take the form of procedural practices to prevent pollutants from contaminating stormwater. The use of this term in this permit is consistent with the discussion of non-structural stormwater BMPs in 64 Federal Register 68760 (December 9, 1999) which encompasses preventative actions that involve management and source controls such as: (1) policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive waterbodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; (2) policies or ordinances that encourage infill development in higher density urban areas, and areas with existing storm sewer infrastructure; (3) education programs for developers and the public about project designs that minimize water quality impacts; and (4) other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control measures often thought of as good housekeeping, preventive maintenance and spill prevention.

ee. **Outfall** is defined as a point source at the point where a municipal separate storm sewer discharges to waters of the state and does not include open conveyances connecting two municipal separate storm sewers or pipes, tunnels, or other conveyances which connect segments of the same stream or other waters of the state and are used to convey waters of the State.

ff. **Owner or Operator** is the owner or operator of any "facility or activity" subject to regulation under the NPDES program.

gg. **Pesticide** as used in this permit carries the same definition as used in the Federal Insecticide, Fungicide, and Rodenticide Act and is any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Under FIFRA, a pest is any insect, rodent, nematode, fungus, weed, or any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism

hh. **Plant Intercept** is the capture of precipitation by the plant canopy and its subsequent return to the atmosphere through evaporation or sublimation.

ii. **Pollutant** is dredged spoil; solid waste; incinerator residue; sewage; garbage; sewerage sludge; munitions; chemical wastes; biological materials; radioactive materials; heat; wrecked or discarded equipment; rock; sand; cellar dirt; and industrial, municipal, and agricultural waste discharged into water (40 CFR §122.2). Section 304(a)(4) of the Clean Water Act designates the following as conventional pollutants: biochemical oxygen demand (BOD5), total suspended solids (TSS), fecal coliform, pH, and any additional pollutants defined by the Administrator as conventional. The Administrator designated oil and grease as an additional conventional pollutant on July 30, 1979 (44 FR 44501). A primary pollutant of concern at construction sites, sediment, is commonly measured as TSS. Per ORS 486B.005(5), "pollution" or "water pollution" means such alteration of the physical, chemical or biological properties of any waters of the state, including change in temperature, taste, color, turbidity, silt or odor of the waters, or such discharge of any liquid, gaseous, solid, radioactive or other substance into any waters of the state, which will or tends to, either by itself or in connection with any other substance, create a public nuisance or which will or tends to render such waters harmful, detrimental or injurious to public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational or other legitimate beneficial uses or to livestock, wildlife, fish or other aquatic life or the habitat thereof.

jj. **Predevelopment Hydrologic Function** is the hydrology of a site reflecting the local rainfall patterns, soil characteristics, land cover, evapotranspiration, and topography. The term predevelopment as used in predevelopment hydrologic function is consistent with the term predevelopment as discussed in Federal Register Volume 64, Number 235 and refers to the runoff conditions that exist onsite immediately before the planned development activities occur. Predevelopment is not intended to be interpreted as the period before any human-induced land disturbance activity has occurred.

kk. **Post-Construction Site Runoff Plan** is a plan developed by a site owner or operator and/or their designer to demonstrate compliance with the post-construction stormwater management and long-term operation and maintenance requirements of this permit.

ll. **Redevelopment** means a project that entails Construction Activities, occurs on a previously developed site and results in the addition or replacement of impervious surface. To the extent allowable under federal law, Redevelopment does not include: Maintenance Activities; Construction Activities conducted to ameliorate a public health or safety emergency or natural disaster; and/or Construction Activities to repair or replace a site or a structure damaged by a public health or safety emergency or natural disaster.

mm. **Regulated small MS4** is a municipal separate storm sewer that is not a medium or large MS4. A large MS4 is defined in 40 CFR §122.26(b)(4). A medium MS4 is defined in 40 CFR § 122.26(b)(7). For the purposes of this permit, a regulated small MS4 is any municipal separate storm sewer system located within a Census-defined Urban Area with a population of 50,000 or more people, including those geographic areas automatically designated as needing an NPDES permit pursuant to federal requirements found in 40 CFR § 122.30-37. A regulated small MS4 may also mean any MS4 designated by DEQ pursuant to 40 CFR §122.26((a)(1)(v) and/or 123.35 as needing a NPDES permit.

nn. **Small Community** is defined as any permit registrant that has a population of less than 10,000 people or is a county that is the sole permit registrant/applicant. If a city or county is a co-registrant at the time of permit coverage or becomes a co-registrant at any time of permit coverage under this permit, it does not meet this definition, and is classified as a Large Community.

oo. **Small MS4** is defined at 40 CFR § 122.26(b)(16) and (17), respectively, and means all separate storm sewers that are: (i) owned or operated by the United States, a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the Clean Water Act that discharges to waters of the state; (ii) not defined as “large” or “medium” municipal separate storm sewer systems pursuant to 40 CFR § 122.26(b)(4) and (b)(7), or designated under 40 CFR § 122.26(a)(1)(v); and (iii) includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

pp. **Stormwater or stormwater runoff** includes snow melt runoff, and surface runoff and drainage, and is defined in 40 CFR §122.26(b)(13). “Stormwater” means that portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, channels, or pipes into a defined surface water channel or a constructed infiltration facility.

qq. **Stormwater Control** refers to non-structural stormwater controls, structural stormwater controls and/or BMPs.

rr. **Stormwater Management Program (SWMP)** refers to a comprehensive program to manage the quality of stormwater discharged from the municipal separate storm sewer system. For the purposes of this permit, the SWMP consists of the permit registrant’s stormwater controls and control measures, including any actions and activities conducted by the permit registrant as required by the permit and described in the permit registrant’s SWMP Document.

ss. **A SWMP Document** is the written, detailed summary describing the unique and/or cooperative means by which an individual permit registrant or entity implements the specific stormwater management control measures required by the permit.

tt. **Stormwater Mitigation Bank Program** is a program for offsite compliance that establishes a market with an entity that tracks the life cycle of an offsite mitigation credit by certifying the credit, issuing a tradable credit to the seller, transferring the ownership of the credit from the seller to the buyer, and use or retirement of the credit to receive a benefit when the buyer of the credit is unable to meet a retention requirement on their site.

uu. **Stormwater Payment-in-Lieu Program** is a program for offsite compliance where the permit registrant or site owner/operator pays a fee in lieu of full compliance on the development site with this fee based on volume ratios (i.e., volume of stormwater to be retained onsite to the volume to be retained at the mitigation site) and a rate specified by the registrant. The registrant can aggregate fees and apply them to a public stormwater structural or non-structural control at a later point in time.

vv. **Structural Stormwater Controls** are stormwater controls that are physically designed, installed, and maintained to prevent or reduce the discharge of pollutants in stormwater to minimize the impacts of stormwater on waterbodies. As noted in the 64 Federal Register 68760 (December 9, 1999), examples of structural stormwater controls or BMPs include: (1) storage practices such as wet ponds and extended-detention outlet structures; (2) filtration practices such as grassed swales, sand filters and filter strips; **and** (3) infiltration practices such as infiltration basins and infiltration trenches.

ww. **Subwatershed** is a subdivision of a watershed and is the sixth-level 12-digit unit of the hydrologic unit hierarchy as defined by the National Watershed Boundary Dataset (USGS et al 2013).

xx. **Transpiration** means to release water vapor into the atmosphere through plant stomata or pores.

yy. **Urban Area with Population of 50,000 or more people** means an urban area as defined by a Decennial Census conducted by the U.S. Census Bureau**.**

zz. **Waters of the State** means lakes, bays, ponds, impounding reservoirs, springs, wells, rivers, streams, creeks, estuaries, marshes, inlets, canals, the Pacific Ocean within the territorial limits of the State of Oregon, and all other bodies of surface or underground waters, natural or artificial, inland or coastal, fresh or salt, public or private (except those private waters that do not combine or effect a junction with natural surface or underground waters) that are located wholly or partially within or bordering the State, or within its jurisdiction.

SCHEDULE F - NPDES PERMIT GENERAL (MS4)

The general conditions in this schedule apply only to the extent they do not conflict with the requirements contained in Schedules A through E. If the permit requirements in Schedule A through D conflict with these general conditions, the permit requirements in Schedule A through D will control.

SECTION A. STANDARD CONDITIONS

A1. Duty to Comply with Permit

The permittee must comply with all conditions of this permit. Failure to comply with any permit condition is a violation of Oregon Revised Statutes (ORS) 468B.025 and the federal Clean Water Act and is grounds for an enforcement action. Failure to comply is also grounds for DEQ to terminate, modify and reissue, revoke, or deny renewal of a permit.

A2. Penalties for Water Pollution and Permit Condition Violations

The permit is enforceable by DEQ or EPA, and in some circumstances also by third parties under the citizen suit provisions of 33 USC § 1365. DEQ enforcement is generally based on provisions of state statutes and Environmental Quality Commission (EQC) rules, and EPA enforcement is generally based on provisions of federal statutes and EPA regulations.

ORS 468.140 allows DEQ to impose civil penalties up to $25,000 per day for violation of a term, condition, or requirement of a permit. The federal Clean Water Act provides for civil penalties not to exceed $25,000 per day for each violation of any condition or limitation of this permit.

Under ORS 468.943, unlawful water pollution in the second degree, is a Class A misdemeanor and is punishable by a fine of up to $25,000, imprisonment for not more than one year, or both. Each day on which a violation occurs or continues is a separately punishable offense. The federal Clean Water Act provides for criminal penalties of not more than $50,000 per day of violation, or imprisonment of not more than 2 years, or both for second or subsequent negligent violations of this permit.

Under ORS 468.946, unlawful water pollution in the first degree is a Class B felony and is punishable by a fine up to $250,000, imprisonment for not more than 10 years or both. The federal Clean Water Act provides for criminal penalties of $5,000 to $50,000 per day of violation, or imprisonment of not more than 3 years, or both for knowing violations of the permit. In the case of a second or subsequent conviction for knowing violation, a person is subject to criminal penalties of not more than $100,000 per day of violation, or imprisonment of not more than 6 years, or both.

A3. Duty to Mitigate

The permittee must take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit. In addition, upon request of DEQ, the permittee must correct any adverse impact on the environment or human health resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

A4. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and have the permit renewed. The application must be submitted at least 180 days before the expiration date of this permit.

DEQ may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date.

A5. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause including, but not limited to, the following:

a. Violation of any term, condition, or requirement of this permit, a rule, or a statute.
b. Obtaining this permit by misrepresentation or failure to disclose fully all material facts.
c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.
d. The permittee is identified as a Designated Management Agency or allocated a wasteload under a total maximum daily load (TMDL).
e. New information or regulations.
f. Modification of compliance schedules.
g. Requirements of permit reopener conditions.
h. Correction of technical mistakes made in determining permit conditions.
i. Determination that the permitted activity endangers human health or the environment.
j. Other causes as specified in 40 CFR § 122.62, 122.64, and 124.5.

The filing of a request by the permittee for a permit modification, revocation or reissuance, termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

A6. Toxic Pollutants

The permittee must comply with any applicable effluent standards or prohibitions established under Oregon Administrative Rules (OAR) 340-041-0033 and 307(a) of the federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the federal Clean Water Act within the time provided in the regulations that establish those standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

A7. Property Rights and Other Legal Requirements

The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege, or authorize any injury to persons or property or invasion of any other private rights, or any infringement of federal, tribal, state, or local laws or regulations.

A8. Permit References

Except for effluent standards or prohibitions established under section 307(a) of the federal Clean Water Act and OAR 340-041-0033 for toxic pollutants, and standards for sewage sludge use or disposal established under section 405(d) of the federal Clean Water Act, all rules and statutes referred to in this permit are those in effect on the date this permit is issued.

A9. Permit Fees

The permittee must pay the fees required by OAR.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

B1. Proper Operation and Maintenance

The permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems that are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

B2. Need to Halt or Reduce Activity Not a Defense

For industrial or commercial facilities, upon reduction, loss, or failure of the treatment facility, the permittee must, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until the facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced or lost. It is not a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B3. Bypass of Treatment Facilities

a. Definitions
   (1) "Bypass" means intentional diversion of waste streams from any portion of the treatment facility. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, provided the diversion is to allow essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs b and c of this section.
   (2) "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

b. Prohibition of bypass.
   (1) Bypass is prohibited and DEQ may take enforcement action against a permittee for bypass unless:
      i. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
      ii. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that occurred during normal periods of equipment downtime or preventative maintenance; and

iii. The permittee submitted notices and requests as required under General Condition B3.c.

(2) DEQ may approve an anticipated bypass, after considering its adverse effects and any alternatives to bypassing, when DEQ determines that it will meet the three conditions listed above in General Condition B3.b(1).

c. Notice and request for bypass.

(1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, a written notice must be submitted to DEQ at least ten days before the date of the bypass.

(2) Unanticipated bypass. The permittee must submit notice of an unanticipated bypass as required in General Condition D5.

B4. Upset

a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operation error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation.

b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of General Condition B4.c are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

c. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset must demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An upset occurred and that the permittee can identify the causes(s) of the upset;

(2) The permitted facility was at the time being properly operated;

(3) The permittee submitted notice of the upset as required in General Condition D5, hereof (24-hour notice); and

(4) The permittee complied with any remedial measures required under General Condition A3 hereof.

d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

B5. Treatment of Single Operational Upset

For purposes of this permit, a single operational upset that leads to simultaneous violations of more than one pollutant parameter will be treated as a single violation. A single operational upset is an exceptional incident that causes simultaneous, unintentional, unknowing (not the result of a knowing act or omission), temporary noncompliance with more than one federal Clean Water Act effluent discharge pollutant parameter. A single operational upset does not include federal Clean Water Act violations involving discharge without a NPDES permit or noncompliance to the extent caused by improperly designed or inadequate treatment facilities. Each day of a single operational upset is a violation.

B6. Public Notification of Effluent Violation

If effluent limitations specified in this permit are exceeded or an overflow occurs that threatens public health, the permittee must take such steps as are necessary to alert the public, health agencies and other affected entities (for example, public water systems) about the extent and

nature of the discharge in accordance with the notification procedures developed under General Condition B7. Such steps may include, but are not limited to, posting of the river at access points and other places, news releases, and paid announcements on radio and television.

B7. Emergency Response and Public Notification Plan

The permittee must develop and implement an emergency response and public notification plan that identifies measures to protect public health from bypasses or upsets that may endanger public health. At a minimum the plan must include mechanisms to:

a. Ensure that the permittee is aware (to the greatest extent possible) of such events;
b. Ensure notification of appropriate personnel and ensure that they are immediately dispatched for investigation and response;
c. Ensure immediate notification to the public, health agencies, and other affected entities (including public water systems). The response plan must identify the public health and other officials that will receive immediate notification;
d. Ensure that appropriate personnel are aware of and follow the plan and are appropriately trained;
e. Provide emergency operations; and
f. Ensure that DEQ is notified of the public notification steps taken.

B8. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters must be disposed of in such a manner as to prevent any pollutant from such materials from entering waters of the state, causing nuisance conditions, or creating a public health hazard.

SECTION C. MONITORING AND RECORDS

C1. Representative Sampling

Sampling and measurements taken as required herein must be representative of the volume and nature of the monitored discharge. All samples must be taken at the monitoring points specified in this permit, and must be taken, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance. Monitoring points must not be changed without notification to and the approval of DEQ. Samples must be collected in accordance with requirements in 40 CFR part 122.21 and 40 CFR part 403 Appendix E.

C2. Flow Measurements

Appropriate flow measurement devices and methods consistent with accepted scientific practices must be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices must be installed, calibrated and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected must be capable of measuring flows with a maximum deviation of less than ± 10 percent from true discharge rates throughout the range of expected discharge volumes.

C3. Monitoring Procedures

Monitoring must be conducted according to test procedures approved under 40 CFR part 136 or, in the case of sludge (biosolids) use and disposal, approved under 40 CFR part 503 unless other test procedures have been specified in this permit.

For monitoring of recycled water with no discharge to waters of the state, monitoring must be conducted according to test procedures approved under 40 CFR part 136 or as specified in the most recent edition of Standard Methods for the Examination of Water and Wastewater unless other test procedures have been specified in this permit or approved in writing by DEQ.

C4. Penalties for Tampering

The federal Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit may, upon conviction, be punished by a fine of not more than $10,000 per violation, imprisonment for not more than two years, or both. If a conviction of a person is for a violation committed after a first conviction of such person, punishment is a fine not more than $20,000 per day of violation, or by imprisonment of not more than four years, or both.

C5. Reporting of Monitoring Results

Monitoring results must be summarized each month on a discharge monitoring report form approved by DEQ. The reports must be submitted monthly and are to be mailed, delivered or otherwise transmitted by the 15th day of the following month unless specifically approved otherwise in Schedule B of this permit.

C6. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR part 136 or, in the case of sludge (biosolids) use and disposal, approved under 40 CFR part 503 or as specified in this permit, the results of this monitoring must be included in the calculation and reporting of the data submitted in the discharge monitoring report. Such increased frequency must also be indicated. For a pollutant parameter that may be sampled more than once per day (for example, total residual chlorine), only the average daily value must be recorded unless otherwise specified in this permit.

C7. Averaging of Measurements

Calculations for all limitations that require averaging of measurements must utilize an arithmetic mean, except for bacteria which must be averaged as specified in this permit.

C8. Retention of Records

Records of monitoring information required by this permit related to the permittee's sewage sludge use and disposal activities must be retained for a period of at least 5 years (or longer as required by 40 CFR part 503). Records of all monitoring information including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit and records of all data used to complete the application for this permit must be retained for a period of at least 3 years from the

date of the sample, measurement, report, or application. This period may be extended by request of DEQ at any time.

C9. Records Contents

Records of monitoring information must include:

a. The date, exact place, time, and methods of sampling or measurements;
b. The individual(s) who performed the sampling or measurements;
c. The date(s) analyses were performed;
d. The individual(s) who performed the analyses;
e. The analytical techniques or methods used; and
f. The results of such analyses.

C10. Inspection and Entry

The permittee must allow DEQ or EPA upon the presentation of credentials to:

a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
d. Sample or monitor at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by state law, any substances or parameters at any location.

C11. Confidentiality of Information

Any information relating to this permit that is submitted to or obtained by DEQ is available to the public unless classified as confidential by the Director of DEQ under ORS 468.095. The permittee may request that information be classified as confidential if it is a trade secret as defined by that statute. The name and address of the permittee, permit applications, permits, effluent data, and information required by NPDES application forms under 40 CFR § 122.21 are not classified as confidential [40 CFR § 122.7(b)].

SECTION D. REPORTING REQUIREMENTS

D1. Planned Changes

The permittee must comply with OAR 340-052, “Review of Plans and Specifications” and 40 CFR § 122.41(l)(1). Except where exempted under OAR 340-052, no construction, installation, or modification involving disposal systems, treatment works, sewerage systems, or common sewers may be commenced until the plans and specifications are submitted to and approved by DEQ. The permittee must give notice to DEQ as soon as possible of any planned physical alternations or additions to the permitted facility.

D2. Anticipated Noncompliance

The permittee must give advance notice to DEQ of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

D3. Transfers

This permit may be transferred to a new permittee provided the transferee acquires a property interest in the permitted activity and agrees in writing to fully comply with all the terms and conditions of the permit and EQC rules. No permit may be transferred to a third party without prior written approval from DEQ. DEQ may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under 40 CFR § 122.61. The permittee must notify DEQ when a transfer of property interest takes place.

D4. Compliance Schedule

Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any compliance schedule of this permit must be submitted no later than 14 days following each schedule date. Any reports of noncompliance must include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirements.

D5. Twenty-Four Hour Reporting

The permittee must report any noncompliance that may endanger health or the environment. Any information must be provided orally (by telephone) within 24 hours from the time the permittee becomes aware of the circumstances, unless a shorter time is specified in the permit. During normal business hours, the DEQ regional office must be called. Outside of normal business hours, DEQ must be contacted at 1-800-452-0311 (Oregon Emergency Response System).

The following must be included as information that must be reported within 24 hours under this paragraph:

a. Any unanticipated bypass that exceeds any effluent limitation in this permit;
b. Any upset that exceeds any effluent limitation in this permit;
c. Violation of maximum daily discharge limitation for any of the pollutants listed by DEQ in this permit; and
d. Any noncompliance that may endanger human health or the environment.

A written submission must also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission must contain:

a. A description of noncompliance and its cause;
b. The period of noncompliance, including exact dates and times;
c. The estimated time noncompliance is expected to continue if it has not been corrected;
d. Steps taken or planned to reduce, eliminate and prevent reoccurrence of the noncompliance; and
e. Public notification steps taken, pursuant to General Condition B7.

DEQ may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

D6. Other Noncompliance

The permittee must report all instances of noncompliance not reported under General Condition D4 or D5, at the time monitoring reports are submitted. The reports must contain:

a. A description of the noncompliance and its cause;

b. The period of noncompliance, including exact dates and times;
c. The estimated time noncompliance is expected to continue if it has not been corrected; and
d. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

D7. Duty to Provide Information

The permittee must furnish to DEQ within a reasonable time any information that DEQ may request to determine compliance with the permit or to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit. The permittee must also furnish to DEQ, upon request, copies of records required to be kept by this permit.

Other Information: When the permittee becomes aware that it has failed to submit any relevant facts or has submitted incorrect information in a permit application or any report to DEQ, it must promptly submit such facts or information.

D8. Signatory Requirements

All applications, reports or information submitted to DEQ must be signed and certified in accordance with 40 CFR § 122.22.

D9. Falsification of Information

Under ORS 468.953, any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance, is subject to a Class C felony punishable by a fine not to exceed $125,000 per violation and up to 5 years in prison per ORS chapter 161. Additionally, according to 40 CFR § 122.41(k)(2), any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit including monitoring reports or reports of compliance or non-compliance will, upon conviction, be punished by a federal civil penalty not to exceed $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

D10. Changes to Discharges of Toxic Pollutant

The permittee must notify DEQ as soon as it knows or has reason to believe the following:

a. That any activity has occurred or will occur that would result in the discharge, on a routine or frequent basis, of any toxic pollutant that is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:
   (1) One hundred micrograms per liter (100 µg/l);
   (2) Two hundred micrograms per liter (200 µg/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
   (3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR § 122.21(g)(7); or
   (4) The level established by DEQ in accordance with 40 CFR § 122.44(f).

b. That any activity has occurred or will occur that would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant that is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

(1) Five hundred micrograms per liter (500 µg/l);
(2) One milligram per liter (1 mg/l) for antimony;
(3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR § 122.21(g)(7); or
(4) The level established by DEQ in accordance with 40 CFR § 122.44(f).

SECTION E. DEFINITIONS

E1. *BOD or BOD_5* means five-day biochemical oxygen demand.
E2. *CBOD or $CBOD_5$* means five-day carbonaceous biochemical oxygen demand.
E3. *TSS* means total suspended solids.
E4. *Bacteria* means but is not limited to fecal coliform bacteria, total coliform bacteria, *Escherichia coli* (*E. coli*) bacteria, and *Enterococcus* bacteria.
E5. *FC* means fecal coliform bacteria.
E6. *Total residual chlorine* means combined chlorine forms plus free residual chlorine
E7. *Technology based permit effluent limitations* means technology-based treatment requirements as defined in 40 CFR § 125.3, and concentration and mass load effluent limitations that are based on minimum design criteria specified in OAR 340-041.
E8. *mg/l* means milligrams per liter.
E9. *µg/l* means microgram per liter.
E10. *kg* means kilograms.
E11. *m^3/d* means cubic meters per day.
E12. *MGD* means million gallons per day.
E13. *Average monthly effluent limitation* as defined at 40 CFR § 122.2 means the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.
E14. *Average weekly effluent limitation* as defined at 40 CFR § 122.2 means the highest allowable average of daily discharges over a calendar week, calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week.
E15. *Daily discharge* as defined at 40 CFR § 122.2 means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the daily discharge must be calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the daily discharge must be calculated as the average measurement of the pollutant over the day.
E16. *24-hour composite sample* means a sample formed by collecting and mixing discrete samples taken periodically and based on time or flow.
E17. *Grab sample* means an individual discrete sample collected over a period of time not to exceed 15 minutes.
E18. *Quarter* means January through March, April through June, July through September, or October through December.
E19. *Month* means calendar month.
E20. *Week* means a calendar week of Sunday through Saturday.

Appendix A - MS4 Phase II General Permit Renewal Application Example

Department of Environmental Quality
Municipal Stormwater Program

State of Oregon Department of Environmental Quality

New and Renewal Application
MS4 Phase II General Permit

National Pollutant Discharge Elimination System
Municipal Separate Storm Sewer System Permit

Submission of this application constitutes notice that the entity in Section A/B has read, understands and meets the eligibility conditions, agrees to comply with all applicable terms and conditions, and understands that continued authorization to discharge pollutants to surface waters of the state under the MS4 General Permit is contingent on maintaining eligibility for coverage.

DEQ USE ONLY				
Date Received:	File # :	Application # :		
Amount: $	Check # :	Name:	Receipt # :	Deposit # :
Notes:				

A. Application Information		
1. Name of Permit Applicant:		
2. Applicant Type: ☐ City / ☐ County / ☐ Special District / ☐ Other:		
3. Land Use Compatibility Statement (LUCS) Attached: ☐ Yes / ☐ No *(LUCS not required for renewals)*		
4. Physical Address of Applicant:		
City:	State:	Zip:
5. Latitude:	Longitude: *(using the approximate center of the coverage area)*	
6. Name of Legally Authorized Representative:		
Title:	Email:	Phone:
7. Mailing Address:		
City:	State:	Zip:
B. Co-Application Information *(attach additional information as needed)*		
1. Names of Co-Applicants:		
2. Applicant Types: ☐ City / ☐ County / ☐ Special District / ☐ Other:		
3. Physical Address of Applicant1:		
City:	State:	Zip:
Name of Legally Authorized Representative:		
4. Physical Address of Applicant2:		
City:	State:	Zip:
Name of Legally Authorized Representative:		
5. Physical Address of Applicant3:		
City:	State:	Zip:
Name of Legally Authorized Representative:		
C. Billing Information		
1. Invoice Contact:		
2. Mailing Address:		
City:	State:	Zip:
Title:	Email:	Phone:

MS4 Phase II General Permit App Page **1** of **6** Revised: 04/6/2023; R. Johnson

D. Contact Information		
1. Primary Contact:		
Title:	Email:	Phone:
Mailing Address:		
City:	State:	Zip:
2. Additional Contact:		
Title:	Email:	Phone:
3. Additional Contact:		
Title:	Email:	Phone:

E. Municipal Separate Storm Sewer System (MS4) Information
1. Estimate of the square mileage served by the MS4:
2. Estimate the population served by the MS4:
3. Provide a copy of your current Stormwater Management Plan Document: Attached: Yes ☐ No ☐ or web address of SWMP Document:
4. Provide a copy of your current MS4 Map Attached: Yes ☐ No ☐ If in GIS format, are shapefiles available for submittal to DEQ: Yes ☐ No ☐ Other Format ☐:
5. Total number of known outfalls:
6. Provide your digital inventory of your known outfalls: Yes ☐ No ☐ Attached: Yes ☐ No ☐

F. Stormwater Discharge and Impaired Waters Information

(Identify the names of all known waters that receive a discharge from your MS4. Attach additional waterbodies as needed)

Receiving Waterbody	# of Outfalls	Impaired		Impairment(s)
		303d listed	TMDL	
1.		Yes ☐ No ☐	Yes ☐ No ☐	
2.		Yes ☐ No ☐	Yes ☐ No ☐	
3.		Yes ☐ No ☐	Yes ☐ No ☐	
4.		Yes ☐ No ☐	Yes ☐ No ☐	
5.		Yes ☐ No ☐	Yes ☐ No ☐	
6.		Yes ☐ No ☐	Yes ☐ No ☐	
7.		Yes ☐ No ☐	Yes ☐ No ☐	
8.		Yes ☐ No ☐	Yes ☐ No ☐	
9.		Yes ☐ No ☐	Yes ☐ No ☐	

G. Minimum Control Measure Implementation

1. Education and Outreach

1.1 Describe your current Education and Outreach Program:

2. Public Involvement and Participation

2.1 Provide your current SWMP Website:

2.2 Describe your current Public Involvement and

Participation approach:

3. Illicit Discharge Detection and Elimination

3.1 Do you have ordinances or other regulatory mechanisms in place to prohibit illicit discharges into your MS4 system?

☐ Yes ☐ No

3.2 Indicate which of the following have an ordinance or other regulatory mechanism to prohibit discharge to the MS4:

- ☐ Septic, sewage, and dumping or disposal of liquids or materials other than stormwater into the MS4
- ☐ Discharges of washwater resulting from the hosing or cleaning of gas stations, auto repair garages, or other types of automotive services facilities
- ☐ Discharges resulting from the cleaning, repair, or maintenance of any type of equipment, machinery, or facility, including motor vehicles, cement-related equipment, and port-a-potty servicing, etc.
- ☐ Discharges of washwater from mobile operations, such as mobile automobile or truck washing, steam cleaning, power washing, and carpet cleaning, etc.
- ☐ Discharges of washwater from the cleaning or hosing of impervious surfaces in municipal, industrial, commercial, or residential areas (including parking lots, streets, sidewalks, driveways, patios, plazas, work yards and outdoor eating or drinking areas, etc.) where detergents are used and spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed)
- ☐ Discharges of runoff from material storage areas, which contain chemicals, fuels, grease, oil, or other hazardous materials from material storage areas
- ☐ Discharges of pool or fountain water containing chlorine, biocides, or other chemicals; discharges of pool or fountain filter backwash water
- ☐ Discharges of sediment, unhardened concrete, pet waste, vegetation clippings, or other landscape or construction-related wastes
- ☐ Discharges of trash, paints, stains, resins, or other household hazardous wastes
- ☐ Discharges of food-related wastes (grease, restaurant kitchen mat and trash bin washwater, etc.)

3.3 Do you have a written escalating enforcement procedure to ensure compliance with the ordinances or other regulatory mechanisms?

☐ Yes ☐ No

3.4 Describe your current program to detect and eliminate illicit discharges including reporting, tracking, investigation and screening:

4. Construction Site Runoff

4.1 Describe the ordinances or other regulatory mechanisms in place to minimize the discharge of pollutants related to construction sites:

4.2 For construction related land disturbance of 7,000 square feet or greater (10,890 square feet for counties and small communities), do you have ordinances or other regulatory mechanisms in place to require erosion controls, sediment controls, and materials management techniques to be employed and maintained at construction projects from initial clearing through final stabilization?

☐ Yes ☐ No

4.3 Do you have a written escalating enforcement procedure to ensure compliance with the ordinances or other regulatory mechanisms?

☐ Yes ☐ No

4.4 Describe your current construction site runoff program:

5. Post-Construction Site Runoff

5.1 Describe the ordinances or other regulatory mechanisms in place to minimize the discharge of pollutants from new development and redevelopment project sites:

5.2 Do you have ordinances or other regulatory mechanisms in place to require the installation and long-term maintenance of permanent nonstructural and structural stormwater controls at new development and redevelopment project sites discharging stormwater to the MS4 creating 5,000 square feet (10,890 square feet for counties) or more of new impervious surface area?

☐ Yes ☐ No

5.3 Do you have LID code-related requirements? ☐ Yes ☐ No

5.4 Describe your current post-construction stormwater management requirements:

6. Pollution Prevention and Good Housekeeping for Municipal Operations

6.1 Describe your current pollution prevention and good housekeeping program:

H. Co-Applicant Information

Complete this part only if you are co-applying with another entity to meet a requirement of the permit. Include, as an attachment, a summary of the permit obligations that will be carried out jointly among co-applicants. The summary must identify the co-applicant(s) and must be signed by all co-applicant(s).

Are you co-applying with another entity or entities? Yes ☐ No ☐

Required:

Summary of joint permit obligations is attached? Yes ☐ No ☐

Summary is signed by all co-applicants? Yes ☐ No ☐

I. Coordination Among Registrants and Joint Agreements

Complete this part only if you are relying on another entity to satisfy one or more of the requirements of the permit. Include as an attachment a summary of the permit obligations that will be carried out by another entity. The summary must identify the other entity or entities and must be signed by the other entity or entities.

Are you relying on another entity or entities to satisfy one or more of the permit obligations? Yes ☐ No ☐

Required:

Summary of joint permit obligations is attached? Yes ☐ No ☐

Summary is signed by all registrants/entities? Yes ☐ No ☐

J. Certification

This application shall be signed by a principal executive officer, ranking elected official or other duly authorized employee consistent with 40 CFR §122.22(b) and certified as follows:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Legally Authorized Representative

Title

Signature of Legally Authorized Representative

Date

K. Fee and Application Submittal

There is no fee associated with a permit renewal. Current registrants will continue to be invoiced annually. For additional information on MS4 fees please see MS4 Fee Rulemaking.

The applicant must submit a hard copy and electronic copy of the complete application to DEQ at the following address:

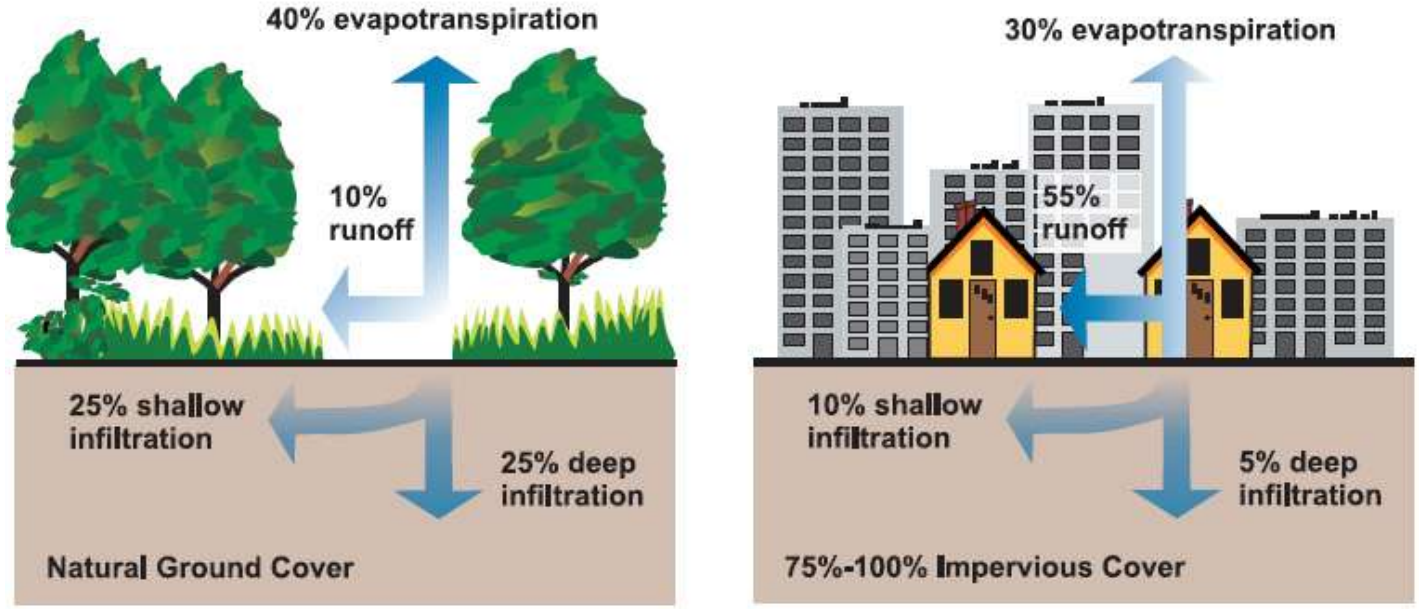
Oregon Department of Environmental Quality
MS4 Stormwater Program, Attention: 7th Floor
700 NE Multnomah St., Suite 600
Portland, OR 97232

MS4Stormwater@deq.state.or.us (this email address can be used for electronic submittals)

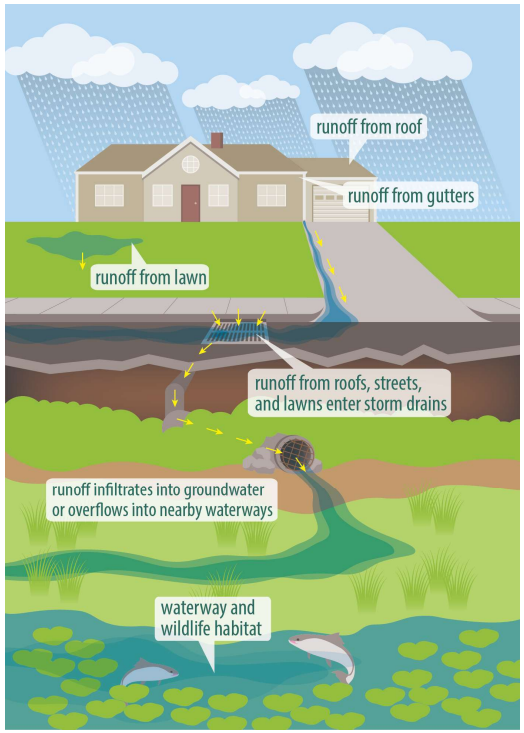
MS4 Permit Update

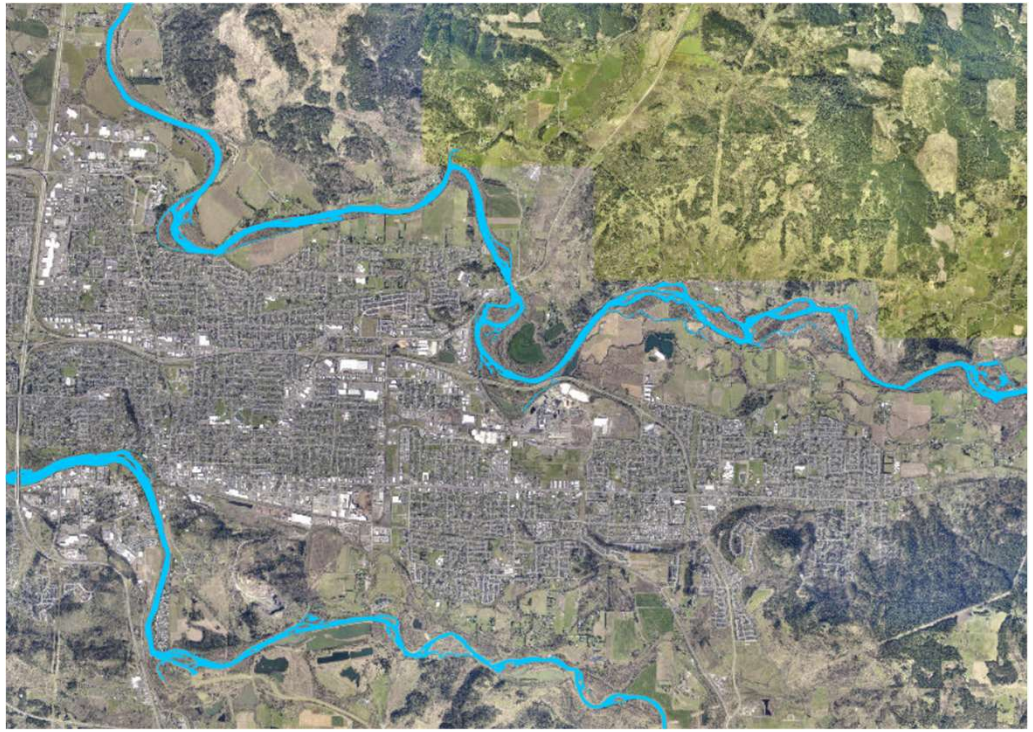
Meghan Murphy
Environmental Services Supervisor
City of Springfield

April 13, 2026
Council Work Session



Stormwater: runoff from urban areas





Stormwater flows to local streams, McKenzie River, Middle Fork Willamette River, Mainstem Willamette River, or into groundwater

Federal Clean Water Act requirements (EPA)

Oregon State Department of Environmental Quality permit program (DEQ)

City of Springfield's Municipal Separate Storm Sewer System (MS4) Permit

Regulation of stormwater discharges from Springfield to Waters of the United States and Waters of the State

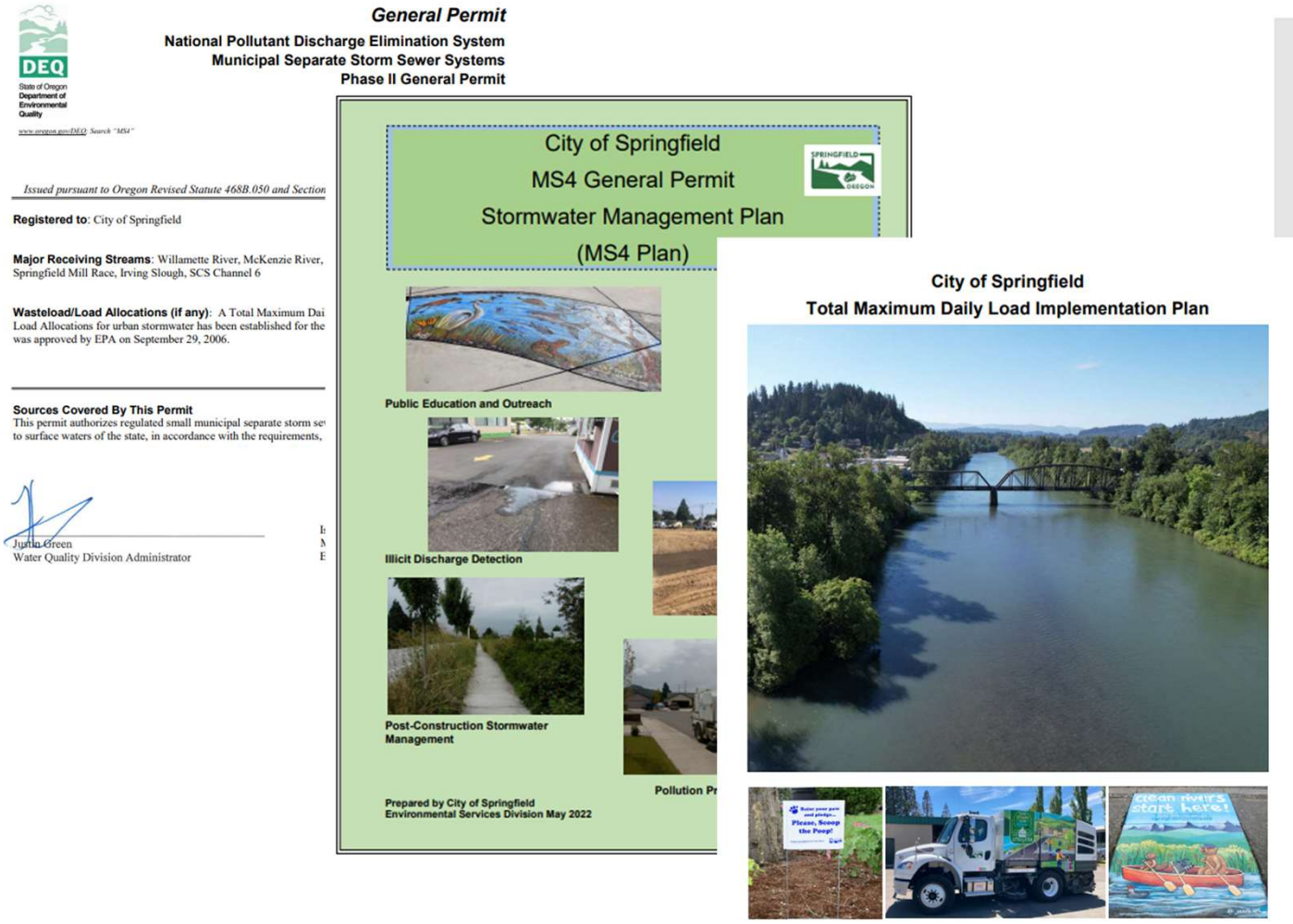
Clean Water Act

&

Springfield's MS4 Permit

Regulatory Context

Goal: Protect water quality and habitat



DEQ
State of Oregon Department of Environmental Quality

General Permit

National Pollutant Discharge Elimination System
Municipal Separate Storm Sewer Systems
Phase II General Permit

Issued pursuant to Oregon Revised Statute 468B.050 and Section

Registered to: City of Springfield

Major Receiving Streams: Willamette River, McKenzie River, Springfield Mill Race, Irving Slough, SCS Channel 6

Wasteload/Load Allocations (if any): A Total Maximum Dai
Load Allocations for urban stormwater has been established for the
was approved by EPA on September 29, 2006.

Sources Covered By This Permit
This permit authorizes regulated small municipal separate storm se
to surface waters of the state, in accordance with the requirements,

Justin Green
Water Quality Division Administrator

City of Springfield
MS4 General Permit
Stormwater Management Plan
(MS4 Plan)

Public Education and Outreach

Illicit Discharge Detection

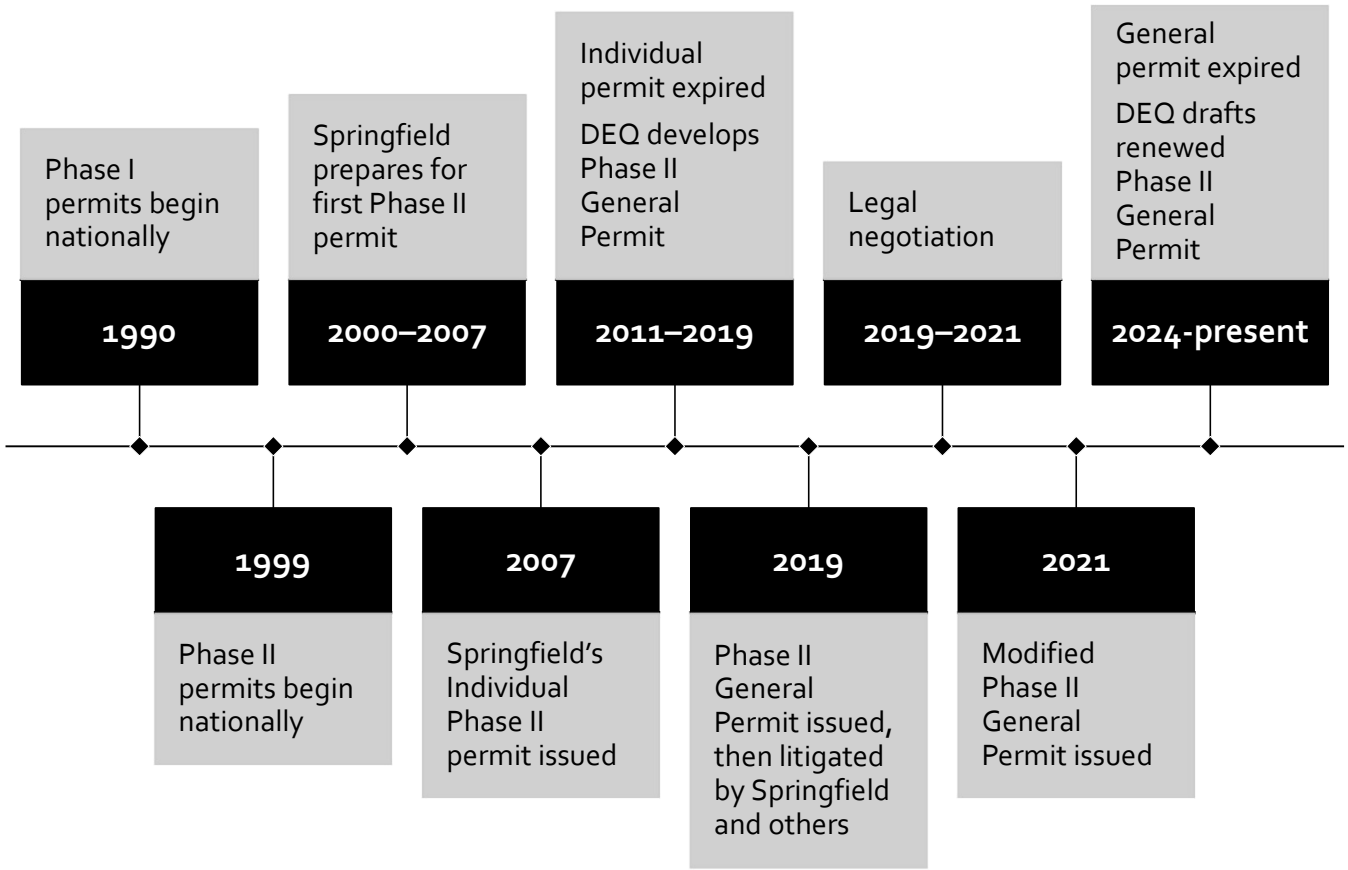
Post-Construction Stormwater Management

Pollution Pr

Prepared by City of Springfield
Environmental Services Division May 2022

City of Springfield
Total Maximum Daily Load Implementation Plan

MS4 Permit History



Springfield's MS4 Permit

Control Measures

Public Education & Outreach

Public Involvement & Participation

Illicit Discharge Detection & Elimination

Construction Site Runoff Control

Post-Construction Site Runoff for New & Redevelopment

Pollution Prevention & Good Housekeeping in Municipal Operations

Public Review Draft MS4 Permit – What's Proposed?

- CHANGE: "*reduce*" to "*prevent*" discharges of pollutants from construction sites
- INCREASE: construction site inspections
- INCREASE: tracking of inspection and cleaning of the stormwater system

Public Review Draft MS4 Permit – What's Proposed?

- ADD: Public education survey
- ADD: Technical memorandum
- ADD: Winter Operations & Maintenance Program

Public Review Draft MS4 Permit– What's Proposed?

- ADD: Industrial Site Screening
- ADD: Adaptive Management Assessments
- ADD: TMDL & 303(d) Evaluation

More staff time

More resources

User fee increases

Draft MS4 Permit

Potential Impacts

Next steps

- Finish legal review
- Submit comment letter to DEQ
- Once permit issued, determine if DEQ addressed comments

Comments & Questions?

Meghan Murphy, Environmental Services Supervisor
Development & Public Works
City of Springfield
mmurphy@springfield-or.gov
541-744-3385
http://www.springfield-or.gov

AGENDA ITEM SUMMARY	Meeting Date:	04/13/2026
	Meeting Type:	Work Session
	Staff Contact/Dept:	Josiah Broomfield/Community Development
	Staff Phone No:	
	Estimated Time:	30 Minutes
S P R I N G F I E L D C I T Y C O U N C I L	Council Goals:	Provide Financially Responsible and Innovative Government Services

ITEM TITLE:
Sanipac Annual Rate Adjustment and Update

ACTION REQUESTED:
Provide guidance and feedback on Sanipac's new proposed fees to be included as part of the general Master Fees & Charges update for approval.

ISSUE STATEMENT:
In accordance with the franchise agreement, Sanipac is proposing a 0% change in rates effective July 1, 2026, based on a Consumer Price Index increase and offsets from the Recycling Modernization Act. Additionally, is required to provide the City with an annual report on its activities.

DISCUSSION/FINANCIAL IMPACT:
Per the franchise agreement, Sanipac can propose an annual fee increase. Due to Consumer Price Index increases, and Recycling Modernization Act related decreases, as well as other factors, Sanipac proposes a 0% rate change.

Attachments

1. Council Briefing Memo
2. Rate Proposal
3. CPI-U 2025
4. Presentation

M E M O R A N D U M **City of Springfield**

Date: 4/13/2026

To: Nancy Newton

From: Jeff Paschall, Community Development Director
Josiah Broomfield, Management Analyst, CMD

Subject: Sanipac Annual Rate Adjustment

COUNCIL BRIEFING MEMORANDUM

ISSUE:

In accordance with the franchise agreement, Sanipac is proposing a 0% change in rates effective July 1, 2026, based on a Consumer Price Index increase and offsets from the Recycling Modernization Act. Additionally, Sanipac is required to provide the City with an annual report on its activities.

COUNCIL GOALS/MANDATE:

Provide Financially Responsible and Innovative Government Services

BACKGROUND:

Annual Update:

Sanipac continues to support recycling and waste reduction efforts in Springfield in alignment with state goals, via their ongoing Yard Debris, Commercial Composting Programs, and other activities. They served 19,794 Springfield customers in FY25, which contributed $873,154 in franchise fees to the City. The company reports minimal customer complaints and maintains structured processes for billing, delinquent accounts, and service continuity.

Additionally, the franchise agreement provides for Sanipac to assist the City in clean-up and beautification activities. During the FY26 period, Sanipac provided the following services at no charge:

Service	Amount
Main St./Rosa Parks Path - Garbage Pickup	$ 2,755.20
Wildish - Trash Service	$ 804.00
Municipal Jail - Trash Service	$ 15,113.52
Drop Boxes and Street Sweeping Removal	$ 116,869.10
Public Works - Other	$ 6,678.68
Maintenance Department - Other	$ 12,174.84
City Hall - Trash Service	$ 8,003.04
Overnight Parking Program - Trash Service	$ 2,899.08
Fire Station - Trash Service	$ 12,233.04
Total	**$ 177,530.50**

Annual Rate Adjustment:

Under Section 16.1 of the City's Franchise Ordinance, Sanipac can request rate adjustments prior to June 30th of each year. This section states several factors that may be used to determine the rate, including, but not limited to:

- Rates charged by collection services in other Oregon cities
- The most recent January Consumer Price Index (CPI-U) for Portland, OR
- The current schedule of any rates required by Lane County
- Proposals made by franchisee regarding an appropriate rate schedule

Requested Rate Change:

Sanipac is proposing 0.0% rate change this FY. Several factors were used to determine this proposal including increases in disposal fees and fuel costs supported by a 2.62% increase in the Consumer Pricer Index. These were offset by impacts from the Recycling Modernization Act, in effect greatly reducing Sanipac's cost to process these materials. No rate change would keep the cost of a commonly used 35-gallon residential container at $23.56/mo for weekly service.

These proposed changes to the solid waste section of the Master Fees & Charges Schedule will take effect July 1, 2026. The complete rate schedule can be found in Attachments 2 of this packet.

To provide historical context, the table below shows the solid waste rate adjustments in Springfield over the past several years.

Sanipac Annual Rate Increases							
	Adopted FY20-21	Adopted FY21-22	Adopted FY22-21	Adopted FY23-24	Adopted FY24-25	Adopted FY25-26	Proposed FY26-27
Overall Rate Increase	0.00%*	2.10%	5.00%	8.15%	4.21%	2.60%	0%

*2020 was waived by Sanipac in recognition that the City also waived a fee increase that year.

Rates Charged in Other Cities:

As described in the franchise, rates charged by collection services in other Oregon cities may be considered when determining rate adjustments in Springfield.

Staff have compiled a list summarizing the rates approved in other communities for the most popular service (35-gallon residential service with weekly pickup). Due to a range of factors influencing the rate structure in other communities, it is difficult to provide a true comparison. However, this information does provide a sense of Springfield's relative cost for residential service compared to other Oregon communities.

Current Rate for 35 Gallon Cart Residential (weekly service)

City	**Current Rate**
Springfield (current)	$23.56
Springfield (proposed)	$23.56
Cottage Grove	$23.75
Veneta	$26.25

Creswell	$26.50
Corvallis (32 gallon)	$30.30
Lowell	$31.80
Eugene	$29.65
Albany (32 gallon)	$31.02

Consumer Price Index:

The current franchise agreement references the Consumer Price Index (CPI-U) for Portland, Oregon as a factor in determining rates. Attachment 3 to this packet includes a summary, provided by Sanipac, of data from the Bureau of Labor Statistics for the CPI-U Western Region, for Size Class B/C cities. This data indicates an increase of 2.62 % as of January 2026.

Sanipac staff will be present at the work session to discuss their request.

Other Considerations:

For Council consideration is a concern that has been raised to staff regarding commercial solid waste hauling fees. Specifically, a customer noted that when an overage is only a fraction of a cubic yard, the current structure results in a charge for a full additional one-yard increment, as overage charges are not prorated. In response to this concern, SaniPac has clarified that charges are applied based on the subscribed service level; for example, a customer paying for one cubic yard of service would not incur an additional overage charge unless their waste volume exceeds the next full increment (i.e., two cubic yards).

RECOMMENDED ACTION: Provide guidance and feedback on Sanipac's proposed fee increase to be included as part of the general Master Fees & Charges update for approval.

SPRINGFIELD CAN/CART RATES

(07/01/2026)

21 Gallon Mini Can

Pickups Per Week	1 Can	Disposal	Total
EOW	11.12	2.12	13.24
1	13.84	2.74	16.58

35 Gallon Can/Cart

Pickups Per Week	1 Can	Disposal	Total	2 Cans	Disposal	Total	3 Cans	Disposal	Total
EOW	12.65	3.81	16.46						
1	18.54	5.02	23.56	37.03	10.09	47.12	55.57	15.05	70.62
2	37.03	10.09	47.12	74.19	20.24	94.43	111.26	30.28	141.54
3	55.57	15.05	70.62	111.26	30.28	141.54	166.90	45.33	212.23
4	74.19	20.24	94.43	148.36	40.36	188.72	222.52	60.55	283.07
5	92.73	25.26	117.99	185.49	50.41	235.90	278.16	75.68	353.84
6	111.26	30.28	141.54	222.52	60.55	283.07	333.80	90.83	424.63

Pickups Per Week	4 Cans	Disposal	Total	5 Cans	Disposal	Total	6 Cans	Disposal	Total
EOW									
1	74.19	20.24	94.43	92.73	25.26	117.99	111.26	30.28	141.54
2	148.36	40.36	188.72	185.49	50.41	235.90	222.52	60.55	283.07
3	222.52	60.55	283.07	278.16	75.68	353.84	333.80	90.83	424.63
4	296.75	80.68	377.43	370.82	100.93	471.75	445.11	121.06	566.17
5	370.82	100.93	471.75	463.67	126.13	589.80	556.37	151.33	707.70
6	445.11	121.06	566.17	556.37	151.33	707.70	667.57	181.61	849.18

65-Gallon Cart

Pickups Per Week	1 Can	Disposal	Total
1	25.74	8.63	34.37
2	51.55	17.22	68.77
3	77.30	25.83	103.13
4	102.99	34.51	137.50
5	128.85	43.10	171.95
6	154.59	51.73	206.32

95-Gallon Cart

Pickups Per Week	1 Can	Disposal	Total
1	31.40	12.46	43.86
2	62.72	25.04	87.76
3	94.11	37.50	131.61
4	125.49	49.99	175.48
5	156.87	62.49	219.36
6	188.21	74.97	263.18

Premium

Cart Size	1 Can	Disposal	Total
35 Gal	22.20	5.33	27.53
65 Gal	37.84	9.53	47.37
95 Gal	59.19	11.74	70.93

Condo/Multi Family Housing

Cart Size	1 Can	Disposal	Total
35 Gal	15.92	5.02	20.94
65 Gal	23.04	8.63	31.67
95 Gal	28.44	12.46	40.90

SPRINGFIELD CONTAINER RATES

(07/01/2026)

Pickups Per Week	**1.0 Yard**	Disposal	Total
1	$ 101.63	$ 29.48	$ 131.11
Each Additional	$ 89.46	$ 29.48	$ 118.94
2	$ 198.53	$ 58.88	$ 257.41
Each Additional	$ 172.73	$ 58.88	$ 231.61
3	$ 294.98	$ 88.37	$ 383.35
Each Additional	$ 254.62	$ 88.37	$ 342.99
4	$ 388.21	$ 117.85	$ 506.06
Each Additional	$ 304.91	$ 117.85	$ 422.76
5	$ 485.09	$ 147.26	$ 632.35
Each Additional	$ 378.23	$ 147.26	$ 525.49
6	$ 577.42	$ 176.69	$ 754.11
Each Additional	$ 451.17	$ 176.69	$ 627.86
7	$ 675.09	$ 206.22	$ 881.31
Each Additional	$ 525.47	$ 206.22	$ 731.69
EOW	$ 40.52	$ 26.76	$ 67.28
1x Per Month	$ 19.18	$ 13.20	$ 32.38

Pickups Per Week	**1.5 Yard**	Disposal	Total
1	$ 146.84	$ 44.25	$ 191.09
Each Additional	$ 128.97	$ 44.25	$ 173.22
2	$ 280.16	$ 88.44	$ 368.60
Each Additional	$ 247.25	$ 88.44	$ 335.69
3	$ 414.05	$ 132.63	$ 546.68
Each Additional	$ 383.40	$ 132.63	$ 516.03
4	$ 591.79	$ 132.63	$ 724.42
Each Additional	$ 524.55	$ 132.63	$ 657.18
5	$ 725.42	$ 176.84	$ 902.26
Each Additional	$ 646.10	$ 176.84	$ 822.94
6	$ 858.81	$ 221.08	$ 1,079.89
Each Additional	$ 763.16	$ 221.08	$ 984.24
7	$ 1,069.75	$ 176.84	$ 1,246.59
Each Additional	$ 1,026.85	$ 176.84	$ 1,203.69
EOW	$ 58.38	$ 39.69	$ 98.07
1x Per Month	$ 27.54	$ 19.45	$ 46.99

Pickups Per Week	**2.0 Yard**	Disposal	Total
1	$ 188.90	$ 58.97	$ 247.87
Each Additional	$ 166.22	$ 58.97	$ 225.19
2	$ 361.42	$ 117.93	$ 479.35
Each Additional	$ 318.96	$ 117.93	$ 436.89
3	$ 533.46	$ 176.85	$ 710.31
Each Additional	$ 482.58	$ 176.85	$ 659.43
4	$ 764.28	$ 176.85	$ 941.13
Each Additional	$ 682.46	$ 176.85	$ 859.31
5	$ 936.60	$ 235.74	$ 1,172.34
Each Additional	$ 835.06	$ 235.74	$ 1,070.80
6	$ 1,108.85	$ 294.78	$ 1,403.63
Each Additional	$ 987.40	$ 294.78	$ 1,282.18
7	$ 1,384.52	$ 235.74	$ 1,620.26
Each Additional	$ 1,254.47	$ 235.74	$ 1,490.21
EOW	$ 66.69	$ 52.50	$ 119.19
1x Per Month	$ 31.42	$ 25.74	$ 57.16

Pickups Per Week	**3.0 Yard**	Disposal	Total
1	$ 265.05	$ 88.44	$ 353.49
Each Additional	$ 233.94	$ 88.44	$ 322.38
2	$ 507.43	$ 176.84	$ 684.27
Each Additional	$ 443.59	$ 176.84	$ 620.43
3	$ 742.01	$ 265.33	$ 1,007.34
Each Additional	$ 655.39	$ 265.33	$ 920.72
4	$ 1,079.23	$ 265.33	$ 1,344.56
Each Additional	$ 959.04	$ 265.33	$ 1,224.37
5	$ 1,321.55	$ 353.70	$ 1,675.25
Each Additional	$ 1,182.82	$ 353.70	$ 1,536.52
6	$ 1,563.48	$ 442.14	$ 2,005.62
Each Additional	$ 1,397.86	$ 442.14	$ 1,840.00
7	$ 1,960.63	$ 353.70	$ 2,314.33
Each Additional	$ 1,783.73	$ 353.70	$ 2,137.43
EOW	$ 102.59	$ 78.30	$ 180.89
1x Per Month	$ 48.31	$ 38.31	$ 86.62

Pickups Per Week	**4.0 Yard**	Disposal	Total
1	$ 330.51	$ 117.93	$ 448.44
Each Additional	$ 292.97	$ 117.93	$ 410.90
2	$ 634.98	$ 235.74	$ 870.72
Each Additional	$ 564.68	$ 235.74	$ 800.42
3	$ 938.41	$ 353.80	$ 1,292.21
Each Additional	$ 835.33	$ 353.80	$ 1,189.13
4	$ 1,359.17	$ 353.80	$ 1,712.97
Each Additional	$ 1,222.87	$ 353.80	$ 1,576.67
5	$ 1,662.58	$ 471.72	$ 2,134.30
Each Additional	$ 1,506.88	$ 471.72	$ 1,978.60
6	$ 1,966.20	$ 589.65	$ 2,555.85
Each Additional	$ 1,764.77	$ 589.65	$ 2,354.42
7	$ 2,482.49	$ 471.72	$ 2,954.21
Each Additional	$ 2,265.57	$ 471.72	$ 2,737.29
EOW	$ 125.93	$ 103.80	$ 229.73
1x Per Month	$ 59.13	$ 50.85	$ 109.98

Pickups Per Week	**5.0 Yard**	Disposal	Total
1	$ 387.68	$ 147.35	$ 535.03
Each Additional	$ 339.92	$ 147.35	$ 487.27
2	$ 746.18	$ 294.76	$ 1,040.94
Each Additional	$ 655.66	$ 294.76	$ 950.42
3	$ 1,103.47	$ 442.15	$ 1,545.62
Each Additional	$ 970.94	$ 442.15	$ 1,413.09
4	$ 1,577.13	$ 442.15	$ 2,019.28
Each Additional	$ 1,432.80	$ 442.15	$ 1,874.95
5	$ 1,964.35	$ 589.63	$ 2,553.98
Each Additional	$ 1,747.76	$ 589.63	$ 2,337.39
6	$ 2,321.81	$ 736.92	$ 3,058.73
Each Additional	$ 2,063.16	$ 736.92	$ 2,800.08
7	$ 2,947.94	$ 589.63	$ 3,537.57
Each Additional	$ 2,669.83	$ 589.63	$ 3,259.46
EOW	$ 145.18	$ 128.82	$ 274.00
1x Per Month	$ 68.00	$ 63.14	$ 131.14

Pickups Per Week	**6.0 Yard**	Disposal	Total
1	$ 437.69	$ 176.85	$ 614.54
Each Additional	$ 414.46	$ 176.85	$ 591.31
2	$ 843.34	$ 353.80	$ 1,197.14
Each Additional	$ 756.07	$ 353.80	$ 1,109.87
3	$ 1,248.06	$ 530.63	$ 1,778.69
Each Additional	$ 1,085.50	$ 530.63	$ 1,616.13
4	$ 1,828.44	$ 530.63	$ 2,359.07
Each Additional	$ 1,662.75	$ 530.63	$ 2,193.38
5	$ 2,233.43	$ 707.52	$ 2,940.95
Each Additional	$ 2,023.43	$ 707.52	$ 2,730.95
6	$ 2,638.09	$ 884.37	$ 3,522.46
Each Additional	$ 2,387.43	$ 884.37	$ 3,271.80
7	$ 3,368.50	$ 707.52	$ 4,076.02
Each Additional	$ 3,097.94	$ 707.52	$ 3,805.46
EOW	$ 161.11	$ 153.60	$ 314.71
1x Per Month	$ 75.22	$ 75.21	$ 150.43

Commercial Container Rent	All Sizes	Disposal	Total
Per Month	$ 26.16	$ -	$ 26.16

SPRINGFIELD COMPACTING CONTAINER RATES

(07/01/2026)

Pickups Per Week	2.0 Yard	Disposal	Total
1	$ 395.97	$ 148.15	$ 544.12
2	$ 735.80	$ 270.76	$ 1,006.56
3	$ 1,103.68	$ 406.18	$ 1,509.86
4	$ 1,471.61	$ 541.53	$ 2,013.14
5	$ 1,839.55	$ 676.87	$ 2,516.42
6	$ 2,207.47	$ 812.23	$ 3,019.70
7	$ 2,575.29	$ 947.63	$ 3,522.92
EOW	$ 159.87	$ 98.48	$ 258.35
On Call	$ 80.02	$ 49.35	$ 129.37

3.0 Yard	Disposal	Total
$ 578.63	$ 238.01	$ 816.64
$ 1,157.41	$ 475.96	$ 1,633.37
$ 1,629.82	$ 823.41	$ 2,453.23
$ 2,172.24	$ 1,098.73	$ 3,270.97
$ 2,716.34	$ 1,372.35	$ 4,088.69
$ 3,259.73	$ 1,646.83	$ 4,906.56
$ 3,802.91	$ 1,921.36	$ 5,724.27
$ 275.52	$ 111.69	$ 387.21
$ 138.01	$ 55.99	$ 194.00

Pickups Per Week	4.0 Yard	Disposal	Total
1	$ 773.21	$ 317.39	$ 1,090.60
2	$ 1,452.15	$ 731.90	$ 2,184.05
3	$ 2,178.21	$ 1,097.96	$ 3,276.17
4	$ 2,904.31	$ 1,463.86	$ 4,368.17
5	$ 3,630.37	$ 1,829.91	$ 5,460.28
6	$ 4,356.42	$ 2,195.80	$ 6,552.22
7	$ 5,082.52	$ 2,561.81	$ 7,644.33
EOW	$ 370.26	$ 150.11	$ 520.37
On Call	$ 185.09	$ 75.08	$ 260.17

SPRINGFIELD EXTRA CHARGE RATES

(07/01/2026)

Container Size	Basic Charge	Disposal	Extra or Overflow Charge	On-Call Charge
1.0 Yard	19.42	13.20	32.62	32.62
1.5 Yard	27.92	19.45	47.37	47.37
2.0 Yard	32.00	25.74	57.74	57.74
3.0 Yard	49.26	38.31	87.57	87.57
4.0 Yard	60.22	50.85	111.07	111.07
5.0 Yard	69.36	63.14	132.50	132.50
6.0 Yard	76.89	75.20	152.09	152.09
Can Charges				
1 Can	4.10	1.46	5.56	
2 Cans	8.18	2.90	11.08	
3 Cans	12.27	4.38	16.65	
4 Cans	16.29	5.74	22.03	
5 Cans	20.38	7.27	27.65	
Major Appliances	Stove - Refrigerator - Washer - Dryer - Hot Water Heater			
Curbside	43.93	30.95	74.88	
Backyard	58.10	30.95	89.05	
Furniture	Sofas - Chairs			
Curbside	23.42	13.95	37.37	
Backyard	37.71	13.95	51.66	
Mattress & Box Spring	(regardless of size)			
Each piece	16.47	19.64	36.11	
Brush, Boxes, Demolition				
Will be charged by volume and time. Volume equated to 32 gallon cans and time spent in loading.				
Other Can Charges				
Yard Waste Service w/ Foodwaste EOW		7.35	0.00	7.35
Additional YW w/ Foodwaste Pickup		7.35	0.00	7.35
Recycle Only Service EOW		5.73	0.00	5.73
Additional Recycle Pickup		7.43	0.00	7.43
Food Waste				
32 Gal 1x per wk	18.76	0.00	18.76	
64 Gal 1x per wk	27.40	0.00	27.40	
1 YD 3x per wk	306.03	0.00	306.03	

SPRINGFIELD DROP BOX CHARGES

(07/01/2026)

Drop Box Size & Description	Basic Charge		Disposal	
20 YD	176.51	$	105.67	per ton
30 YD	264.74	$	105.67	per ton
40 YD	353.03	$	105.67	per ton
Stationary Compactor Charge Per Cubic Yard	8.82	$	105.67	per ton
Box Delivery Fee (Any Size)	34.58			
Spotting Fee & Relocate Box	34.58			
Demurrage Charge (Box Rental) Beginning after the seventh day Excluding Sunday and Holidays	8.91	per day		

SPRINGFIELD BIOMEDICAL CHARGES

10 Gallon Incinerated	29.89
20 Gallon Incinerated	34.94
35 Gallon Incinerated	42.78
1 Gallon Container	11.71

CPI for All Urban Consumers (CPI-U)
Original Data Value

Series Id: CUURN400SA0,CUUSN400SA0 https://data.bls.gov/timeseries/cuurn400sa0,cuusn400sa0
Not Seasonally Adjusted
Series Title: All items in West - Size Class B/C, all urban consumers,
Area: West - Size Class B/C
Item: All items
Base DECEMBER 1996=100
Years: 2015 to 2024

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
2015	142.022	143.005	143.887	144.426	145.346	145.198	144.917	144.752	144.507	144.379	143.595	143.398	144.119	143.981	144.258
2016	143.932	144.128	144.264	145.128	145.942	145.866	145.850	145.829	146.130	146.328	146.004	145.918	145.443	144.877	146.010
2017	146.469	147.451	147.880	148.496	148.789	148.792	148.691	149.255	149.954	150.336	150.003	149.920	148.836	147.980	149.693
2018	150.564	151.200	151.702	152.350	153.201	153.546	153.464	153.797	154.158	154.729	154.625	154.228	153.130	152.094	154.167
2019	154.328	154.671	155.178	156.523	157.488	157.564	157.465	157.654	157.738	158.635	158.482	158.496	157.019	155.959	158.078
2020	158.599	159.183	159.129	158.824	158.301	158.857	159.752	160.528	160.846	161.141	161.069	160.840	159.756	158.816	160.696
2021	161.199	162.042	163.257	165.088	166.813	168.425	169.267	169.477	169.977	171.226	172.214	172.722	167.642	164.471	170.814
2022	174.269	175.890	178.019	179.339	180.810	182.790	183.277	183.543	184.088	185.410	184.626	183.686	181.312	178.520	184.105
2023	184.717	185.968	187.301	188.008	188.833	189.295	189.737	190.368	191.238	191.321	190.409	190.095	188.941	187.354	190.528
2024	191.586	191.874	194.047	194.913	194.709	194.203	193.360	193.662	194.320	194.632	194.491	194.384	193.848	193.555	194.142
2025	195.274	196.261	197.611	198.765	199.541	199.465	199.796	200.409	201.076		200.344	199.732	198.934	197.820	200.271

2016	0.92%
2017	2.33%
2018	2.89%
2019	2.54%
2020	1.74%
2021	4.94%
2022	8.15%
2023	4.21%
2024	2.60%
2025	2.62%

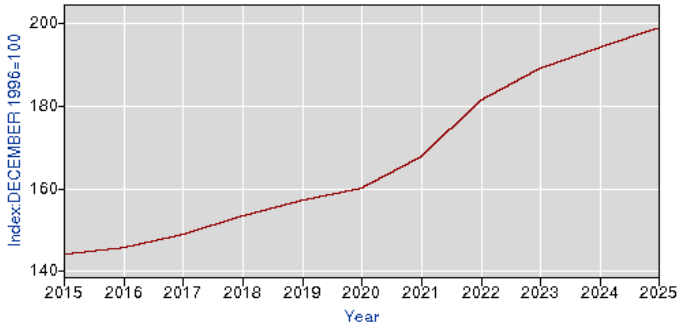
Databases, Tables & Calculators by Subject

Change Output Options: From: 2015 To: 2025 GO
include graphs include annual averages More Formatting Options

Data extracted on: January 13, 2026 (5:46:19 PM)

Consumer Price Index for All Urban Consumers (CPI-U)

Series Id: CUURN400SA0,CUUSN400SA0
Not Seasonally Adjusted
Series Title: All items in West - Size Class B/C, all urban consumers, not seasonally adjusted
Area: West - Size Class B/C
Item: All items
Base Period: DECEMBER 1996=100



Download: xlsx

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
2015	142.022	143.005	143.887	144.426	145.346	145.198	144.917	144.752	144.507	144.379	143.595	143.398	144.119	143.981	144.258
2016	143.932	144.128	144.264	145.128	145.942	145.866	145.850	145.829	146.130	146.328	146.004	145.918	145.443	144.877	146.010
2017	146.469	147.451	147.880	148.496	148.789	148.792	148.691	149.255	149.954	150.336	150.003	149.920	148.836	147.980	149.693
2018	150.564	151.200	151.702	152.350	153.201	153.546	153.464	153.797	154.158	154.729	154.625	154.228	153.130	152.094	154.167
2019	154.328	154.671	155.178	156.523	157.488	157.564	157.465	157.654	157.738	158.635	158.482	158.496	157.019	155.959	158.078
2020	158.599	159.183	159.129	158.824	158.301	158.857	159.752	160.528	160.846	161.141	161.069	160.840	159.756	158.816	160.696
2021	161.199	162.042	163.257	165.088	166.813	168.425	169.267	169.477	169.977	171.226	172.214	172.722	167.642	164.471	170.814
2022	174.269	175.890	178.019	179.339	180.810	182.790	183.277	183.543	184.088	185.410	184.626	183.686	181.312	178.520	184.105
2023	184.717	185.968	187.301	188.008	188.833	189.295	189.737	190.368	191.238	191.321	190.409	190.095	188.941	187.354	190.528
2024	191.586	191.874	194.047	194.913	194.709	194.203	193.360	193.662	194.320	194.632	194.491	194.384	193.848	193.555	194.142
2025	195.274	196.261	197.611	198.765	199.541	199.465	199.796	200.409	201.076	-(X)	200.344	199.732	198.934	197.820	200.271

X : Data unavailable due to the 2025 lapse in appropriations

Springfield – Eugene: Residential rate comparisons

During the Lane County Board of Commissioners Meeting on 12/9/25 and 3/31/36, County staff made statements and presented information claiming Sanipac's rates were higher in Springfield than in Eugene.

Before the 12/9/25 presentation, Sanipac emailed the County and provided public comment in person requesting the County staff delay their presentation until Sanipac could speak with them about a number of items we believed were incorrect and could cause public confusion. The County staff gave their presentation later that day without contacting Sanipac.

During a meeting with County staff after that presentation, Sanipac explained, among other things, the rate comparisons provided by staff were inaccurate due largely to a misunderstanding of the differences in costs between subscription and mandatory yard debris programs.

On 3/31/26, County staff presented another rate comparison slide, again repeating the misunderstanding about subscription vs. mandatory rates.

Yard Debris

Year	# of Participants
2015	5,848
2016	6,602
2017	6,053
2018	5,922
2019	6,009
2020	6,248
2021	6,781
2022	7,264
2023	7,938
2024	8,281
2025	8,561

8,561 / 17,931 residential homes = 48%

Yard Debris Program Types

Subscription: Each residential customer decide individually whether they want yard debris collection. (This is the method used in the City of Springfield.)

Mandatory: Build in the cost of the service to your trash bill and spread it across all residential customers. (This is the method used in the City of Eugene.)

Subscription:

Mandatory:

Example: 100 Households

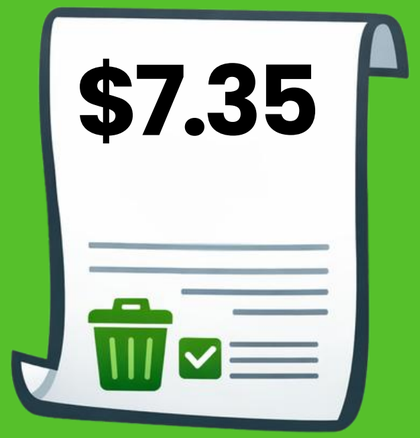
Subscription:

- Driver/truck/processing costs = $400
- Rate to cover costs = $8/household
  ($8 x 50 households = $400)

Mandatory:

- Driver/truck/processing costs = $500
- Rate to cover costs = $5/household
  ($5 x 100 households = $500)

Springfield:



Other Can Charges

Yard Waste Service w/ Foodwaste EOW	7.35

https://springfield-or.gov/wp-content/uploads/2025/07/FY26-Master-Fees-and-Charges-Schedule.pdf

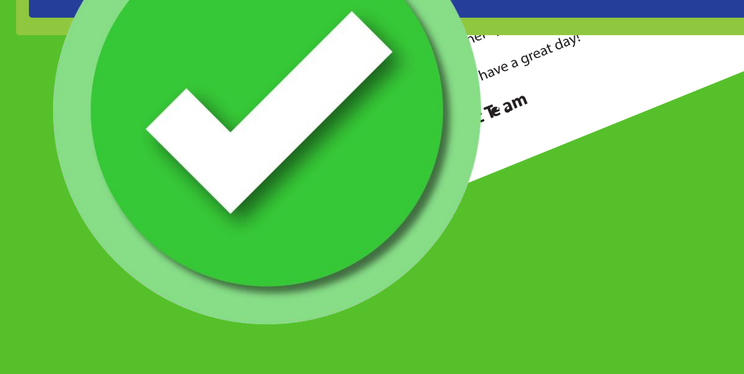
Eugene:

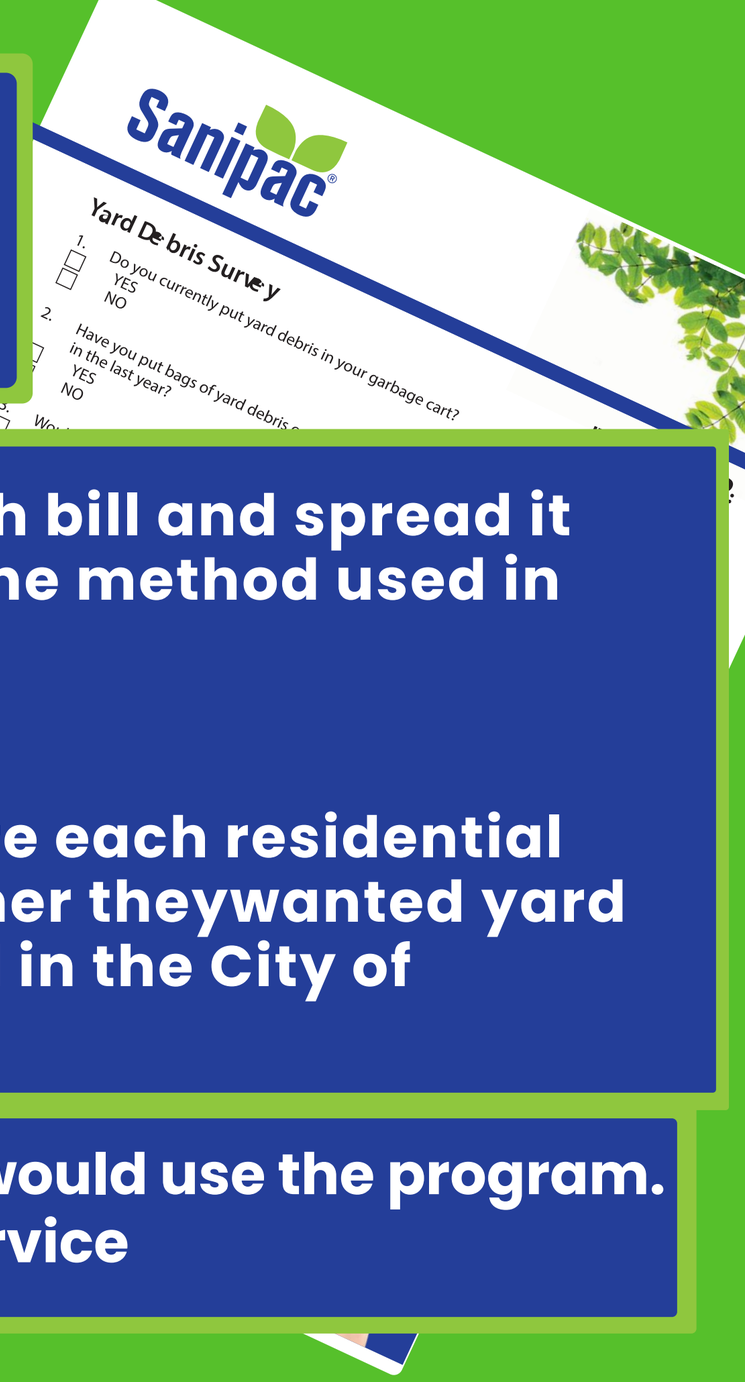
Additional Residential Services:

1.	Yard debris every other week (EOW) for exempt categories	$4.04 /month

https://www.eugene-or.gov/DocumentCenter/View/79469/AO-53-25-06-F----Solid-Waste-Rule-Amendments-part-2---signed

Creswell 2018
Yard Debris Pre-Launch Survey





$3.85/month: Build in the cost of the service to your trash bill and spread it across all residential customers. (This is the method used in the City of Eugene.)

$6.45/month: Provide a subscription based service where each residential customer would decide individually whether theywanted yard debris collection. (This is the method used in the City of Springfield.)

- 57% of residents said they would use the program.
- 38% wanted mandatory service

Excerpts from County presentations slides:

Comparing Springfield trash rates to Eugene rates with Springfield's $7.35/month subscription yard debris rate subtracted.

City of Eugene		
Year	Adjustment %	Cost (35 gal cart - weekly) minus Yard Debris at Spfld Rate
2022	0%	$17.49
2023	6%	$18.99
2024	4%	$20.04
2025	3%	$20.67

City of Springfield			
Year	Adjustment %	Cost (35 gal cart - weekly) without Yard Debris	% Higher than Eugene
2022	4%	$20.37	16.5%
2023	6%	$22.03	16.0%
2024	3%	$22.96	14.6%
2025	3%	$23.56	14.0%

Week of December 9, 2025 - page 252
https://www.lanecountyor.gov/cms/One.aspx?portalId=3585881&pageId=21105691

Comparing: Springfield trash + subscription yard debris to Eugene trash with mandatory yard debris.

Springfield – Sanipac	Eugene – Sanipac
$30.90	$29.92
• $23.55 waste • $7.35 yard debris	• Both waste and yard debris included in cost

March 31, 2026 - page 518
https://pub-lanecounty.escribemeetings.com/FileStream.ashx?DocumentId=2560

≠

Springfield

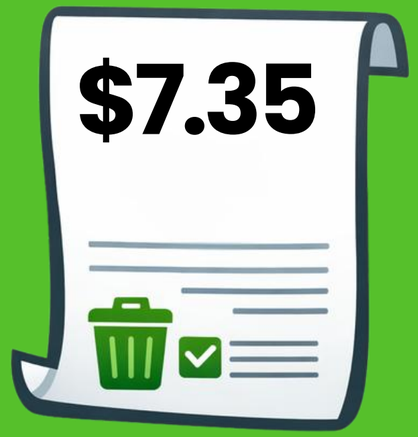
Eugene

=

Springfield

Eugene

Springfield:



Other Can Charges

Yard Waste Service w/ Foodwaste EOW	7.35

https://springfield-or.gov/wp-content/uploads/2025/07/FY26-Master-Fees-and-Charges-Schedule.pdf

Eugene mandatory yard debris cost

Eugene:

Additional Residential Services:

1.	Yard debris every other week (EOW) for exempt categories	$4.04 /month

https://www.eugene-or.gov/DocumentCenter/View/79469/AO-53-25-06-F----Solid-Waste-Rule-Amendments-part-2---signed

$23.56
Springfield

=

$23.98
Eugene
($28.02 - $4.04 = $23.98)

	Springfield		Eugene
35 gallon	$23.56		$23.98
65 gallon	$41.70		$44.53
95 gallon	$51.20		$55.91

City Beautification

· Sanipac regularly empties 10 garbage cans along Main Street and along the Rosa Parks path on Pioneer Parkway at no charge to the city for an annual savings of $2755.20.

· We provide weekly trash pickup at the Wildish Theatre at no charge to the city for an annual savings of $804.

· We provide 3 times per week service at the Jail for an annual savings of $15,113.52

· We are also pleased to provide the drop boxes and disposal of street sweepings at no charge to the City. The street sweepings Sanipac disposed of on behalf of the City this year was a savings to the City of Springfield of $116,869.10.

· Sanipac provides many other donated services to City facilities and endeavors, including Public Works ($6678.68), Maintenance Department ($12,174.84), City Hall ($8,003.04), Overnight Parking ($2,899.08), and Fire Stations ($12,233.04).

· Sanipac is also happy to work with the Springfield Fall Leaf Collection Program. The Fall Leaf Collection Program is a mutual effort by the citizens of Springfield, the City Maintenance Department, and Sanipac. The program has been extremely successful and is the envy of many communities whose programs are more costly and less efficient.

· All told the donation of services to the City of Springfield this year was $177,530.50.

Difference in City fees paid:

Eugene = 3% residential 6% commercial

Springfield = 7%

City of Eugene min +10%

	Springfield	= Eugene min +10%
35 gallon	$23.56	$26.38
65 gallon	$41.70	$48.98
95 gallon	$51.20	$61.50

CITY OF EUGENE
MINIMUM SOLID WASTE CONSOLIDATED COLLECTION RATES
(Maximum Rate is 10% Above Rates Contained Herein)

AGENDA ITEM SUMMARY	Meeting Date:	04/13/2026
	Meeting Type:	Work Session
	Staff Contact/Dept:	Jami Resch/Springfield Police Department
	Staff Phone No:	
	Estimated Time:	45 Minutes
SPRINGFIELD CITY COUNCIL	Council Goals:	Strengthen Public Safety by Leveraging Partnerships and Resources

ITEM TITLE:
2025 SPD Annual Use of Force Report

ACTION REQUESTED:
Provide feedback on Springfield Police Department's annual Use of Force Report and Analysis

ISSUE STATEMENT:
The Springfield Police Department's 2025 Use of Force Report is an annual report that provides a summary of the force used during the 2025 calendar year and recommendations to consider to further reduce injuries, improve processes, and enhance force-related training.

DISCUSSION/FINANCIAL IMPACT:
In 2020, The Springfield Police Department implemented a yearly use of force analysis and report that provides a synopsis of the force used during the previous calendar year. These use of force incidents are police officer responses to calls that resulted in either a show of force or actual use of force requiring a police report and supervisor's review per the Department's Use of Force General Order 1.5.1, which can be located on the website at https://springfield-or.gov/city/police-department/department-policies/.

The 2025 Use of Force Report was completed using the Springfield Police Department's force data retrieved from the IAPro/Blue Team software. In November 2021, the Springfield Police Department adopted this software and began implementation of an enhanced data collection process for capturing information related to officer uses and shows of force. During 2025, the Springfield Police Department received 43,823 calls for service - 30,150 of these required a sworn officer response, and 3,680 calls resulted in arrest. Out of these calls for service, 139 resulted in use of force. On average, each sworn member assigned to patrol was involved in five use of force events in 2025. It was determined that, when comparing the volume of calls for service and actual arrests made by the Springfield Police Department to the number of use of force incidents, 3.70% of arrestees had force used on them and 0.50% of police-dispatched calls for service required use of force. Use of force events decreased by 12% in 2025 compared with 2024, and 20% fewer subjects were injured as a result of force in 2025 compared with 2024.

Attachments

1. 2025 Use of Force Presentation
2. 2025 Use of Force Report
3. 2025 Use of Force Summary

Springfield Police Department

2025 USE OF FORCE REPORT

PRESENTED BY:

THE CITY OF SPRINGFIELD POLICE DEPARTMENT

2025 Use of Force Report

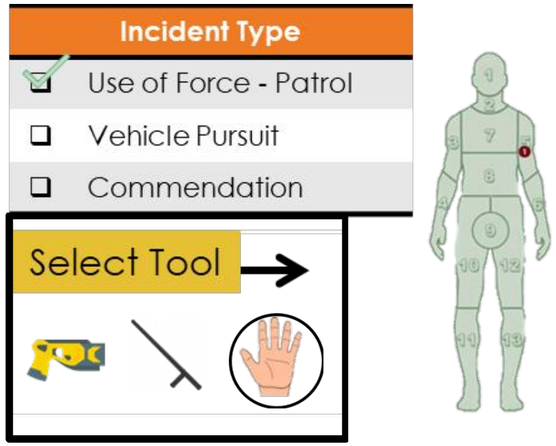
- General Overview
- Routing
- Force Counting Method
- Policy, Training, and Equipment
- Force Types Used and Shown
- Use and Show of Force Effectiveness
- Subject Injuries
- Officer Injuries
- De-escalation
- 2024 Recommendations
- 2025 Recommendations

GENERAL OVERVIEW

	2025	2024
Total Calls for Service	43,823	47,945
Police dispatched calls for service	30,150	31,931
Calls resulting in use of force	139	158
Calls resulting in show of force	131	112
Percentage of calls resulting in use of force	0.5%	0.5%
Percentage of calls resulting in show of force	0.4%	0.4%
Incidents Involving Arrest	3,680	4,113
Percentage of arrests involving use of force	3.8%	3.8%
Percentage of arrests involving show of force	3.6%	2.7%
Individuals Arrested	2,647	2,851
Arrested individuals involved in a use of force	138	159
Arrested individuals involved in a show of force	137	114
Percentage of arrested individuals involved in a use of force	5.2%	5.6%
Percentage of arrested individuals involved in a show of force	5.2%	4.0%
SPD police officer holds	156	152
Police officer holds involving use of force	6	8
Percentage of police officer holds that resulted in a use of force	3.8%	5.3%

Routing

Officer opens Blue Team



Officer inputs use of force details

Officer submits use of force entry. Watch commander attaches body cam footage, photos, and reports. Watch commander reviews the incident and

(a) forwards the incident directly to the database if the incident involves a within-policy, non-injury control hold or show of force.

OR

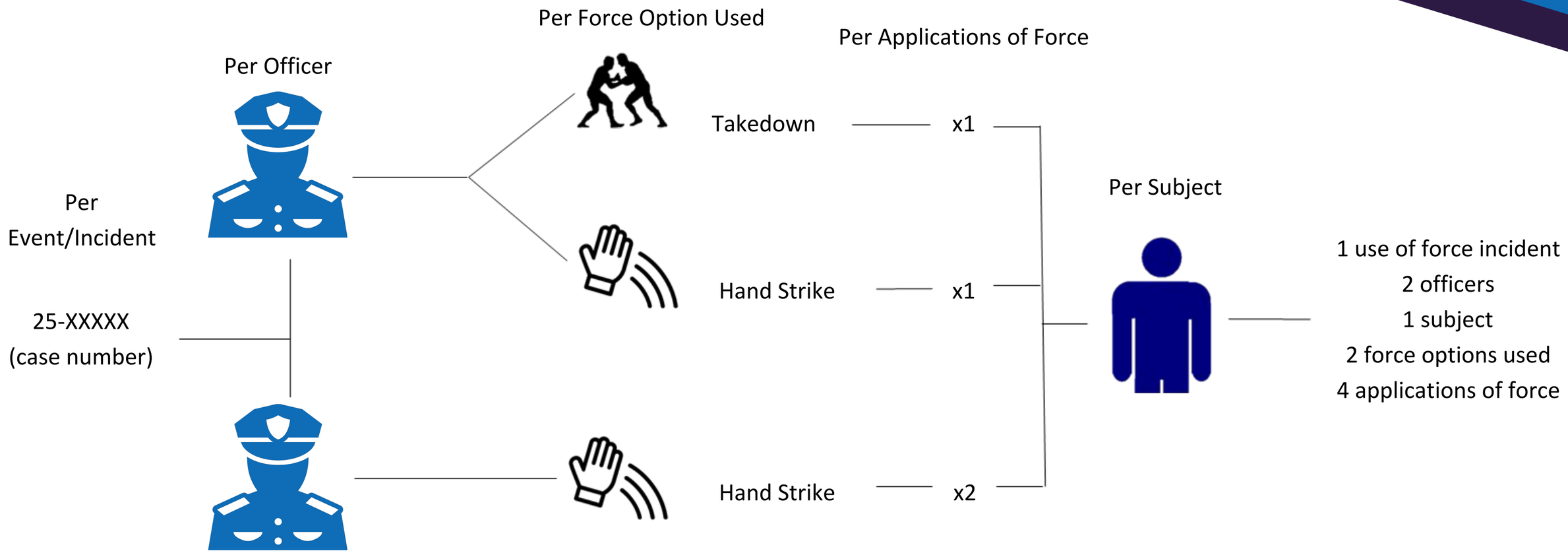
(b) forwards the incident to the division lieutenant.

Division lieutenant reviews all submitted materials for approval or additional follow up.

IAPRO
THE LEADING PROFESSIONAL STANDARDS SOFTWARE. WORLDWIDE.

Force entry is submitted to the Professional Standards Division where it is given a final review and tracked in IAPro.

Force Counting Method



Policy, Training, and Equipment

POLICY

→ There were no changes to policy content during 2025. Post use of force responsibilities were moved into their own section.

TRAINING

- Firearms – 16 hours (all sworn personnel)
- Control Tactics – 8 hours (all sworn personnel)
- Critical Incident Training – 40 hours (new or previously untrained dispatch, jail, and sworn personnel)
- Crisis Negotiation Team Training – 96 hours (all CNT personnel)
- De-Escalation Types Definitions Training – 0.5 hours (all sworn personnel)

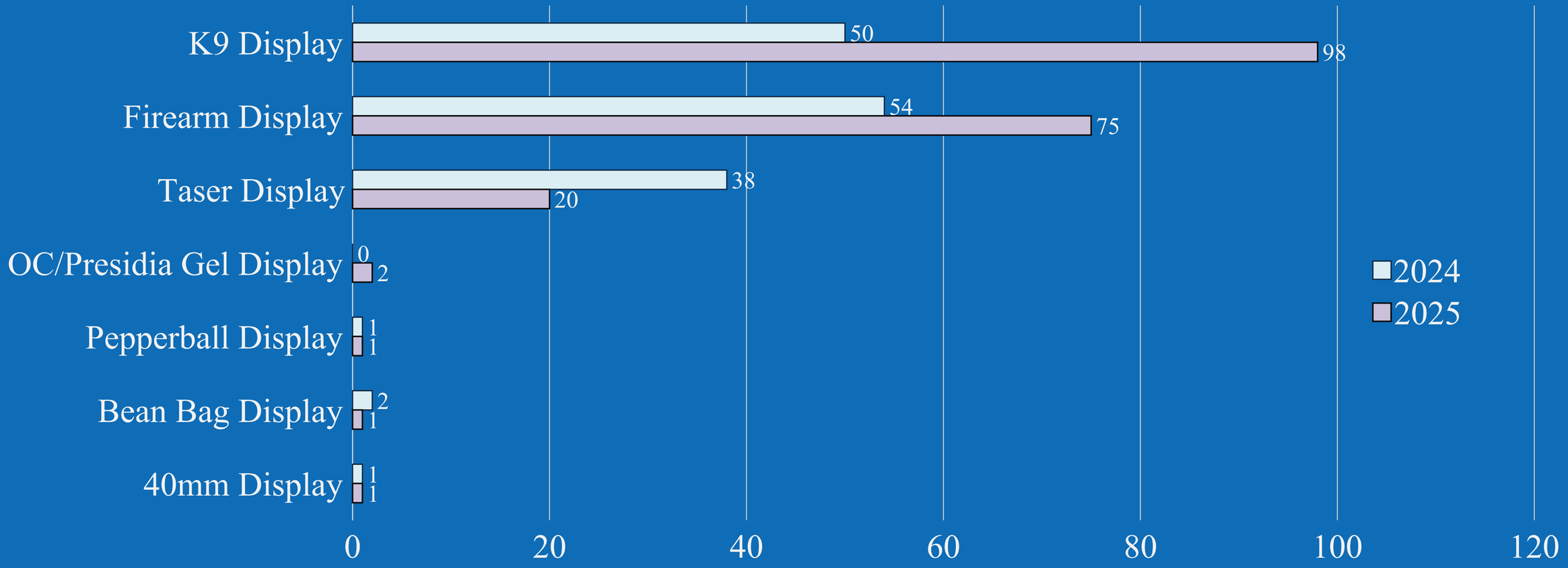
EQUIPMENT

→ SPD did not adopt any new force-related equipment in 2025.

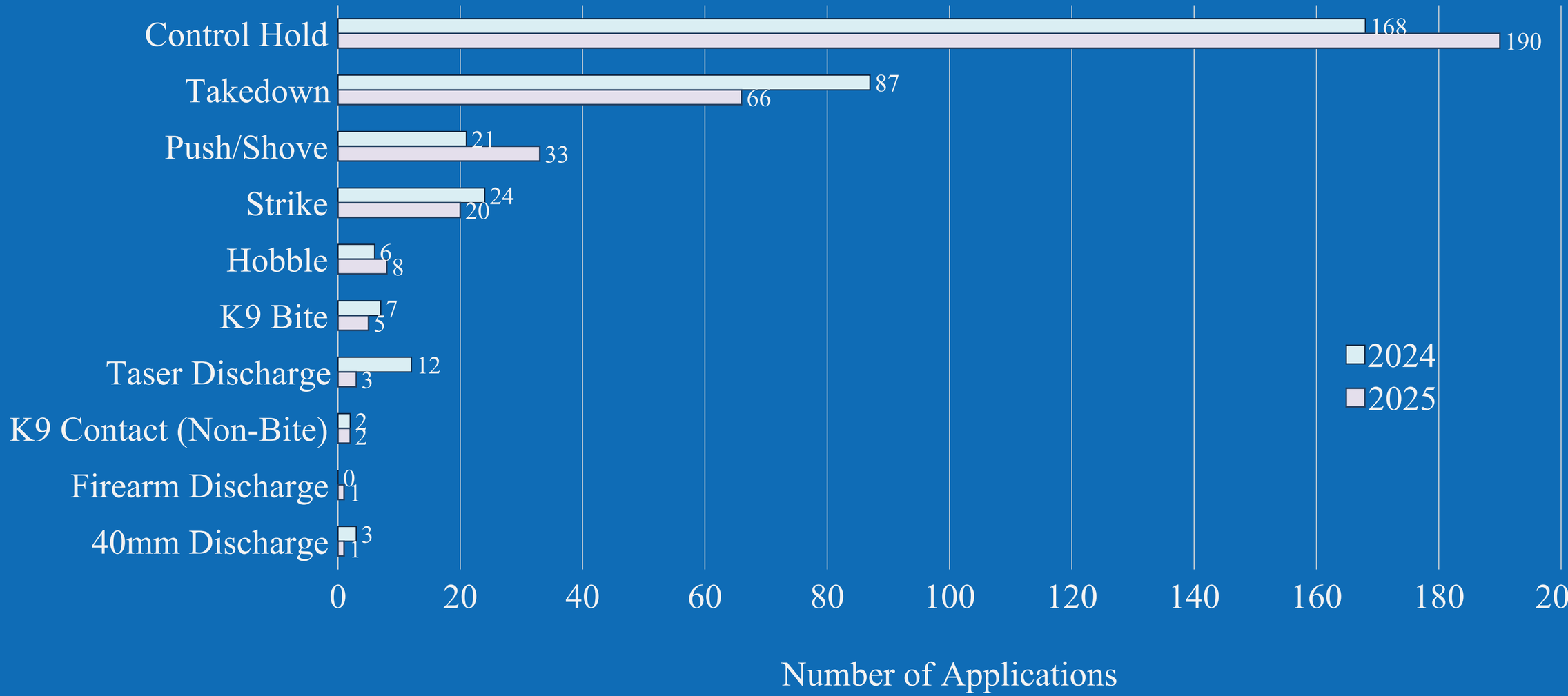
FORCE REVIEW COMMITTEE

→ One FRC is in progress regarding the officer-involved shooting that occurred in 2025.

Force Types Shown



Force Types Used



Show of Force Effectiveness

Force Type	Shows	Effective Shows	Ineffective Shows	2025 Effectiveness (%)	2024 Effectiveness (%)
40mm Display	1	1	0	100%	100%
Bean Bag Display	1	1	0	100%	100%
Firearm Display	75	70	5	93.3%	96.3%
K9 Display	98	97	1	99.0%	98.0%
OC/Presidia Gel Display	2	2	0	100%	Not Used
Pepperball Display	1	1	0	100%	100%
Taser Display	20	19	1	95.0%	84.2%
Total	**198**	**191**	**7**	**96.5%**	**93.8%**

Use of Force Effectiveness

Force Type	Uses	Effective Uses	Ineffective Uses	2025 Effectiveness (%)	2024 Effectiveness (%)
40mm Discharge	1	0	1	0.0%	100%
Control Hold	190	180	10	94.7%	90.5%
Firearm Discharge	1	1	0	100%	Not Used
Hobble	8	7	1	87.5%	83.3%
K9 Bite	5	4	1	80.0%	85.7%
K9 Contact (Non-Bite)	2	1	1	50.0%	50.0%
Push/Shove	33	33	0	100%	81.0%
Strike	20	15	5	75.0%	83.3%
Takedown	66	65	1	98.5%	100%
Taser Discharge	3	0	3	0.0%	66.7%
Total	**329**	**306**	**23**	**93.0%**	**90.4%**

Subject Injuries

Injury Type	Number of Injuries	Injury Categories
Minor Injury – a physical injury as defined by ORS 161.015 that does not require any form of evaluation or treatment.	18	Abrasions/lacerations, complaints of pain, bruises
Moderate Injury - a physical injury as defined by ORS 161.015 and requires medical evaluation and/or treatment (NOT hospital admittance) for force-related injuries.	15	Abrasions/lacerations, concussion, complaints of pain, dog bites, bone fractures (noses, ribs), unconsciousness
Serious Injury - a serious physical injury as defined by ORS 161.015 and requires hospital admittance for force-related injuries.	0	N/A
Death	1	Gunshot wound
Incidents Involving Injury	34	--

2024 - 43 incidents involving injury
2025 - 34 incidents involving injury

→ 20% reduction in incidents involving subject injury

Officer Injuries

Injury Type	Number of Injuries	Injury Categories
Minor Injury – a physical injury as defined by ORS 161.015 that does not require any form of evaluation or treatment.	16	Abrasions/lacerations, complaints of pain, internal injuries (joints, etc.)
Moderate Injury - a physical injury as defined by ORS 161.015 and requires medical evaluation and/or treatment (NOT hospital admittance) for force-related injuries.	2	Abrasions/lacerations, complaints of pain, internal injuries (joints, etc.)
Serious Injury - a serious physical injury as defined by ORS 161.015 and requires hospitalization for force-related injuries.	0	N/A
Death	0	N/A
Incidents Involving Injury	18	--

2024 - 19 incidents involving injury
2025 - 18 incidents involving injury

→ No change in the number of reported officer injuries

De-Escalation

De-Escalation Type	Frequency
Contacted Friends and/or Family	16
CNT Deployed	4
Separated Disputing Parties	18
Maintained Distance	67
Offered Transport to Hospital	11
Attempted to Build Rapport	128
Attempted to Establish Dialogue	185
Offered CAHOOTS	7
None – Not Safe, Prudent, or Feasible	91

→ 83 force events where all officers who used force attempted de-escalation.
→ 28 force events where at least one officer who used force attempted de-escalation.
→ 23 force events where all officers indicated that de-escalation was not safe, prudent, or feasible.

→ Decrease in CAHOOTS service hours

→ More police officers holds, but fewer resulted in use of force.

2024 Recommendations

Recommendation 1

Applications of Force, Injuries, and Training

Status: Completed

- Decrease in subject injuries between 2024 and 2025
- More force applications used during fewer events.
- Force options used and injury rates correspond to trainings.

Recommendation 2

Subject Resistances

Status: Completed

Officers were trained on resistance type definitions and data collection was completed.

Recommendation 3

Incidents without Use of Force

Status: Completed

Analyzed 20 calls for service where de-escalation was used successfully and no force was used.

2025 Recommendations

Analysis & Recommendation 1

Detention officers also use force and participate in force-related trainings.

↓

Provide additional analyses related to jail use of force to determine if and how training, tactics, equipment, and policy may be improved.

Analysis & Recommendation 2

Officers are required to designate between effective and ineffective force types, which can be subjective.

↓

Provide guidelines to help officers determine what makes force effective or ineffective. Use the data to guide trainings.

Analysis & Recommendation 3

Force events involving subject injury have decreased over the last two years.

↓

Continue to review force events to determine if there are aspects of force techniques that can continue to be trained to improve force event outcomes.

Springfield Police Department
2025 Use of Force Report

Created by:
Professional Standards Division

Jami Resch
Chief of Police

Table of Contents

Introduction

Purpose

The Springfield Police Department's (SPD's) members regularly engage with individuals from all parts of our community, and, when circumstances require it, may use reasonable force in carrying out their duties. SPD's use of force policy manual provides guidelines on the reasonable use of force in carrying out police department duties, and every department member is expected to use these guidelines to make use of force decisions in a professional, unbiased, and reasonable manner.

SPD's use of force policy dictates that officers shall only use force that is objectively reasonable to effectively bring an incident under control while protecting their safety and the safety of others. Policy also mandates that officers shall only use the level of force that a reasonably prudent officer would use under the same or similar circumstances, and officers must strive to use the minimum force necessary to accomplish their lawful objectives.

Police use of force is a significant issue for our community and SPD recognizes that it requires constant evaluation. This annual report has a dual purpose of building trust and analyzing how force incidents can be reduced. This comprehensive use of force analysis is intended to identify and analyze data, trends, and patterns to determine whether training, tactics, equipment, and/or policy can be changed to reduce force incidents and produce safer interactions between the community and SPD. Sharing force data with the public also builds transparency, increases community trust, and adds an additional layer of internal accountability.

Methodology

Since 2021, SPD has been using the paired Blue Team and IAPro software programs to collect, review, and manage officer uses and shows of force. Officers submit force modules in Blue Team that are subsequently reviewed by multiple levels of supervision. Supervisors review police reports, body camera footage, photographs, and any other relevant documentation alongside the force module. Once the force module has been reviewed by all required levels of supervision, the module is forwarded to Professional Standards where it is given a final review and tracked using IAPro.

While each officer submits a force module for his/her own force, there may be multiple subjects and multiple officers involved in one incident. Therefore, the data in this report will be presented in a variety of ways. Analyses use force data as it relates to the number of incidents, the number of involved officers, the number of involved subjects, the types of force options used, and the number of force applications. Figure 1 displays the method for counting data points related to uses and shows of force.

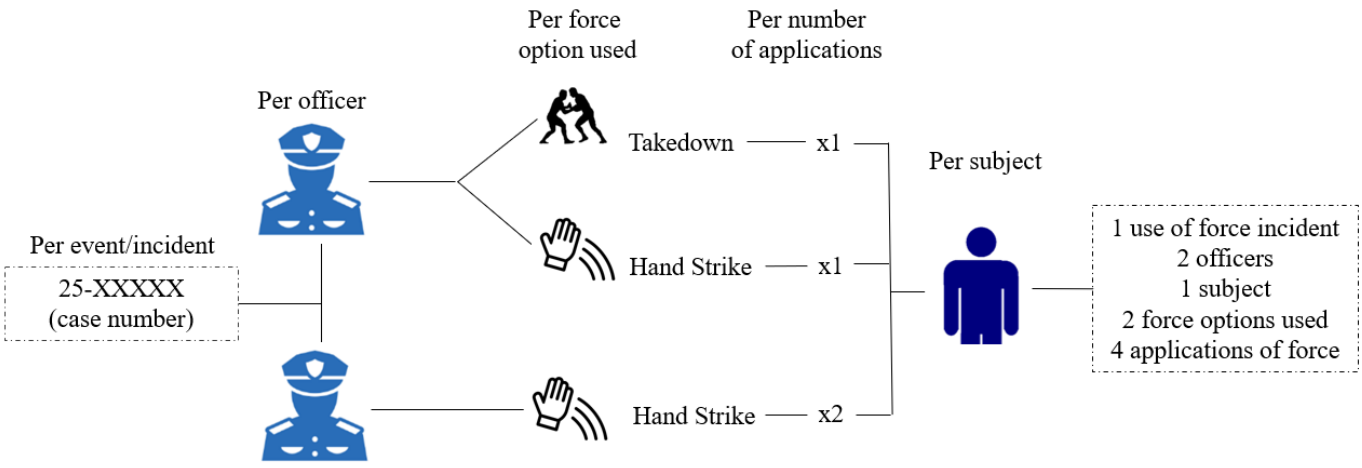


Figure 1. Force Counting Method

Professional Standards

The Springfield Police Department's Professional Standards Division (PSD) reports directly to the Chief of Police and, for 2025, consisted of a lieutenant, a sergeant, and an analyst. PSD is responsible for tracking and managing use of force data and conducting the analysis provided in this report. Additionally, the PSD Lieutenant serves as the litigation liaison between the department and the City Attorney's Office and oversees all internal affairs investigations.

If a supervisor identifies a potential policy violation related to force (or any other department or city policy) during the course of a force module review, the supervisor documents the potential violation in a separate module in Blue Team. The investigation into the policy violation is handled outside of the use of force module in accordance with the Personnel Complaints policy, General Order 52.1.1.

General Statistics

Uses of Force and Calls for Service

The Springfield Police Department received 43,823 calls for service in 2025, and sworn police officers were dispatched to 30,150 of these calls. 3,680 of these police-dispatched calls resulted in arrest, and 3,946 people were arrested[1]. 139 calls for service resulted in use of force on 146 subjects. Overall, force was used during 0.46% of police-dispatched calls for service, and 3.70% of arrestees had force used on them.

[1] Some incidents involve the arrest of more than one person.

Year	Calls Resulting in Arrest	Use of Force Events	Individuals Arrested	Arrestees Who Had Force Used on Them	Percentage of Arrestees Who Had Force Used on Them
2024	4,113	158	4,472	174	3.89%
2025	3,680	139	3,946	146	3.70%

Table 1. Year-to-Year Arrests Comparison

Table 17 in Appendix 1 provides a general overview of uses of force as they relate to calls for service and arrests between 2021 and 2025.

Uses of Force per Officer

In 2025, SPD employed 41 patrol officers and six patrol sergeants[2]. On average, each sworn SPD member assigned to patrol (patrol officers and sergeants) used force seven times in 2025. The median number of uses of force per sworn patrol member in 2025 was five[3]. Table 2 provides further statistics on uses of force as they relate to sworn patrol personnel.

	2025	2024
Number of Patrol Officers and Sergeants Employed	47	46
Average applications of force per patrol member	7	7
Average use of force events per patrol member	5	5
Median applications of force per patrol member	5	5
Median use of force events per patrol member	4	4
Mode[2] applications of force per patrol member	2	5
Number of patrol members who used the mode number of applications of force	6	8
Number of patrol members who did not use force at all	6	7

Table 2. Patrol Member Force Applications

Uses of Force Geographically

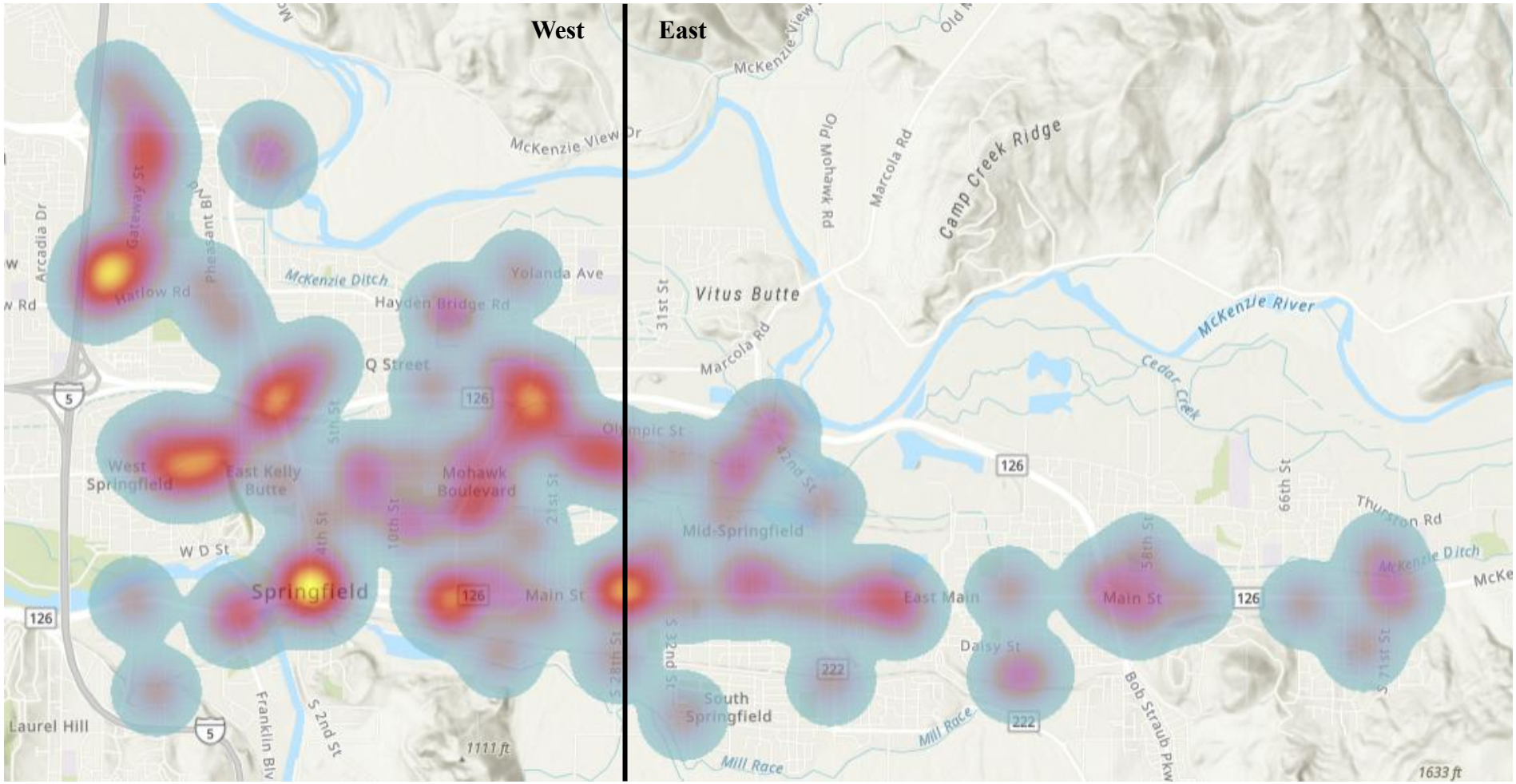
SPD officers patrol the city in two districts – "East" and "West". East covers all property east of 28th Street, while West covers all property west of 28th Street. The West generated 64.9% of all calls for service in 2025 and accounted for 71.2% of use of force events. The East generated 30.6% of all calls for service in 2025 and accounted for 27.3% of use of force events. All other

[2] Not all patrol personnel were employed for the entirety of the 2025 calendar year. The 41 officers and six sergeants include employees who retired, resigned, promoted, and were hired within the year.

[3] An average (mean) is the central value in a data set and is calculated by dividing the sum of the set's values by the number of values in the set. The average is affected by outliers. The median is the middle (midpoint) value in a data set. It is calculated by ordering the numbers in a set from smallest to largest and finding the value in the middle. The median is less affected by outliers. The mode is the most common value in a data set.

calls for service (outside city limits) accounted for 4.5% of all calls for service and 1.5% of use of force events.

Figure 2. Heat Map Representing Use of Force Events Across Springfield



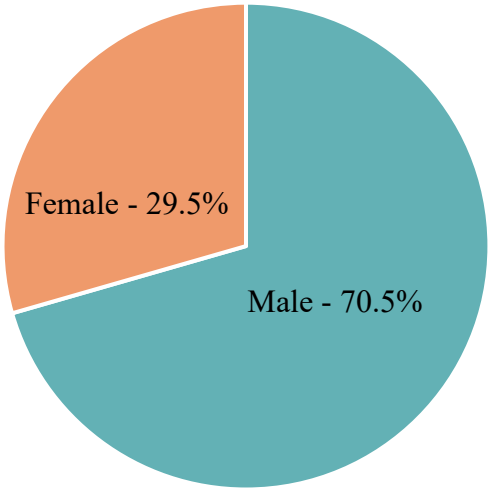
Subject Demographics

Subject demographic information was calculated based on the number of unique individuals contacted during each event. Collecting data in this manner prevents repeat offenders from skewing the data and accounts for the possibility of having more than one subject during a use of force event.

Gender

There were 146 individuals who had force used on them in 2025; 70.5% of these people identified as male and 29.5% identified as female (officers have the ability to select "Male", "Female", "Non-Binary", or "Unknown" when marking a subject's gender in Blue Team). 2025 statistics as they relate to use of force and subject gender remained consistent with 2024's statistics for the same metric.

Figure 3. Use of Force and Subject Gender

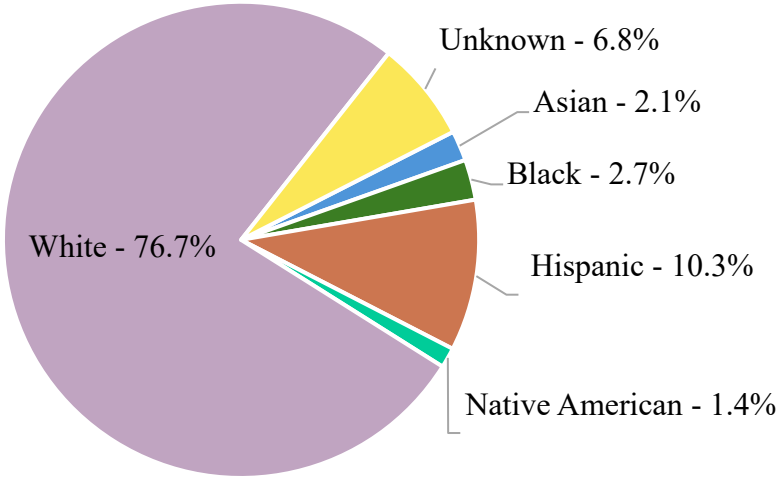


Gender	Number of Subjects in 2025	Percentage of Subjects in 2025	Number of Subjects in 2024	Percentage of Subjects in 2024
Female	43	29.5%	48	30.2%
Male	103	70.5%	110	69.2%
Non-Binary	0	0.0%	1	0.6%
Unknown	0	0.0%	0	0.0%
Total	**146**	**100%**	**159**	**100%**

Race

Out of the 146 subjects who had force used on them, 76.7% were white, 2.7% were black, 10.3% were Hispanic, 1.4% were Native American, 2.1% were Asian, and 6.8% were an unknown race. "White", "Black", "Hispanic", "Native American", "Asian", and "Unknown" are the options in Blue Team for selecting a subject's race. 2025 statistics as they relate to use of force and subject race also remained consistent with 2024's statistics for the same metric.

Figure 4. Use of Force and Subject Race

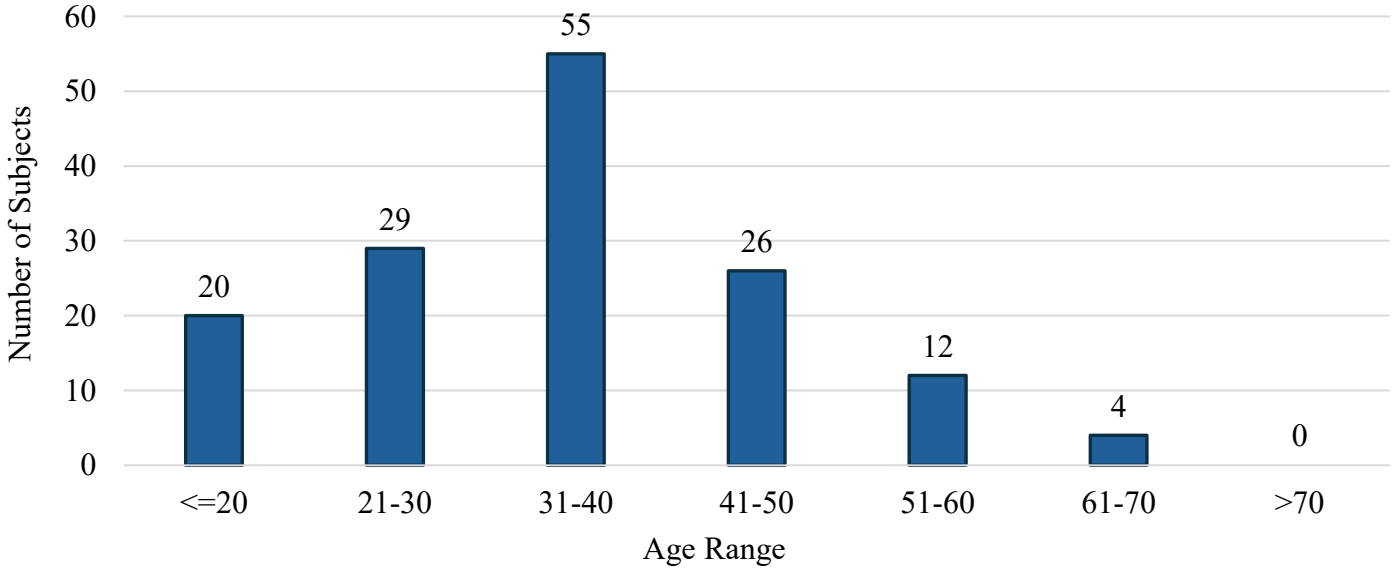


Race	Number of Subjects in 2025	Percentage of Subjects in 2025	Number of Subjects in 2024	Percentage of Subjects in 2024
Asian	3	2.1%	3	1.9%
Black	4	2.7%	12	7.5%
Hispanic	15	10.3%	15	9.4%
Native American	2	1.4%	2	1.3%
White	112	76.7%	124	78.0%
Unknown	10	6.8%	3	1.9%
Total	**146**	**100%**	**159**	**100%**

Age

Subjects who had force used on them were most often between 31 and 40 years of age. Officers may select "unknown" in Blue Team if they do not know a subject's age or date of birth.

Figure 5. Use of Force and Subject Age



Age	Number of Subjects in 2025	Percentage of Subjects in 2025	Number of Subjects in 2024	Percentage of Subjects in 2024
<=20	20	13.7%	12	7.5%
21-30	29	19.9%	43	27.0%
31-40	55	37.7%	56	35.2%
41-50	26	17.8%	29	18.2%
51-60	12	8.2%	10	6.3%
61-70	4	2.7%	6	3.8%
>70	0	0.0%	3	1.9%
Unknown	0	0.0%	0	0.0%
Total	**146**	**100%**	**159**	**100%**

Force Types Used

Force Types

The types of force used and shown by SPD members have been broken down into the following 17 categories and are separated based on uses and shows. The show of a weapon (show of force) is defined as a member's display of a control device, firearm, or K-9 with the intent to influence the subject's behavior.

Figure 6. Show of Force Type Counts

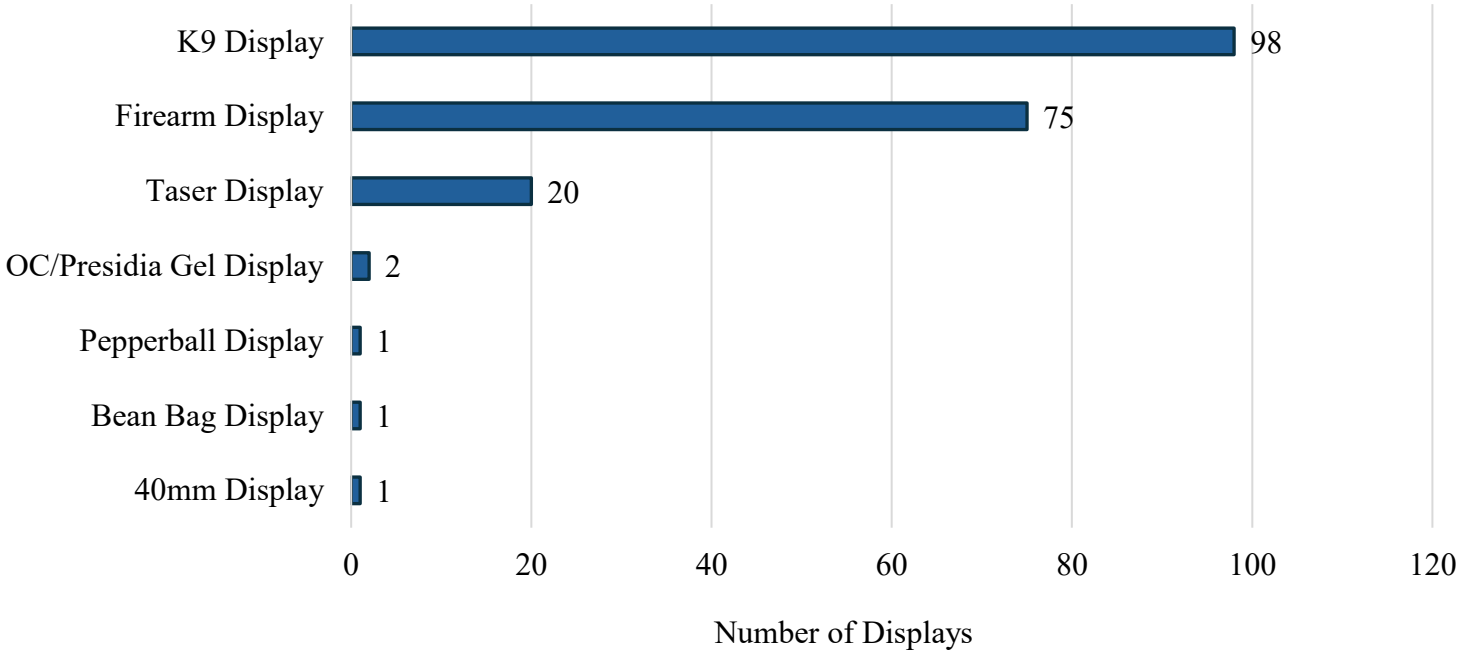
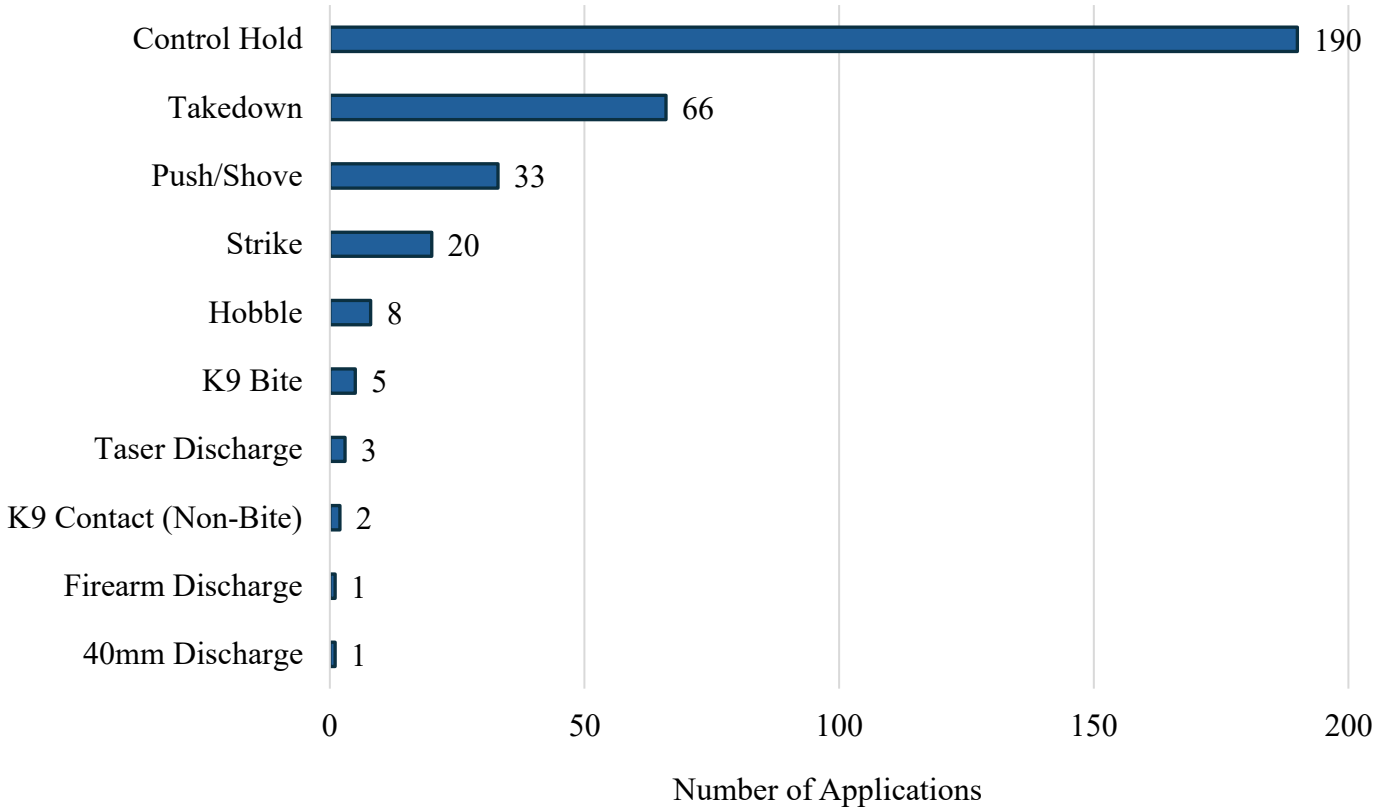


Figure 7. Use of Force Type Counts



Officers used about the same number of force applications in 2025 compared with 2024; however, they used 36% more shows of force in 2025. This increase in shows of force can be partially attributed to the addition of a new K9 team. In 2025, officers used fewer takedowns, taser discharges, and less-lethal/impact munitions discharges, but they used more control holds and pushes/shoves. This may be attributed to the recent Control Tactics trainings where such force types were covered (see Appendix 2).

Force Type Effectiveness

In Blue Team, officers select whether their use or show of force was effective or ineffective. Since officers use and show force for a variety of reasons, and an officer's perception of an incident depends on a multitude of factors, effectiveness is a subjective metric. Effectiveness is used to gauge overall confidence with a tool or technique and determine how that tool/technique can be trained better. Reasons for effectiveness and ineffectiveness are not tracked in Blue Team, but officers are expected to describe this metric in their incident report.

Overall, officers rated their shows of force as 96.5% effective and their uses of force as 93.0% effective. 2025 shows of force were rated slightly more effective than 2024 shows of force, and 2025 applications of force were rated slightly more effective than 2024 applications of force. Control holds and hobbles were noticeably more effective in 2025 – these force types were focal points of the most recent Control Tactics training.

Force Type	Shows	Effective Shows	Ineffective Shows	2025 Effectiveness (%)	2024 Effectiveness (%)
40mm Display	1	1	0	100%	100%
Bean Bag Display	1	1	0	100%	100%
Firearm Display	75	70	5	93.3%	96.3%
K9 Display	98	97	1	99.0%	98.0%
OC/Presidia Gel Display	2	2	0	100%	Not Used
Pepperball Display	1	1	0	100%	100%
Taser Display	20	19	1	95.0%	84.2%
Total	**198**	**191**	**7**	**96.5%**	**93.8%**

Table 3. Show of Force Type Effectiveness

Force Type	Uses	Effective Uses	Ineffective Uses	2025 Effectiveness (%)	2024 Effectiveness (%)
40mm Discharge	1	0	1	0.0%	100%
Control Hold	190	180	10	94.7%	90.5%
Firearm Discharge	1	1	0	100%	Not Used
Hobble	8	7	1	87.5%	83.3%
K9 Bite	5	4	1	80.0%	85.7%
K9 Contact (Non-Bite)	2	1	1	50.0%	50.0%
Push/Shove	33	33	0	100%	81.0%
Strike	20	15	5	75.0%	83.3%
Takedown	66	65	1	98.5%	100%
Taser Discharge	3	0	3	0.0%	66.7%
Total	**329**	**306**	**23**	**93.0%**	**90.6%**

Table 4. Use of Force Type Effectiveness

Ineffective Uses of Force

As stated above, force effectiveness is dependent on many different, subjective reasons. Table 5 summarizes these reasons for ineffectiveness for the 23 ineffective uses of force from 2025. Recommendation 2 discusses how SPD will use these reasons for ineffectiveness to improve training in 2026.

Force Type	Number of Ineffective Uses	Reason(s) for Ineffectiveness
40mm Discharge	1	• Subject's resistance did not change following the force application.
Control Hold	10	• Some subjects were larger, stronger, and more stable, and officers had to move on to other force options.

		• Some officers were unable to use control holds to separate subjects from their vehicles. • Some subjects maintained a firm grasp on nearby objects.
Hobble	1	• The hobble itself was applied correctly, but it did not stop the subject from continuing to resist.
K9 Bite	1	• The K9 was unable to apprehend the subject.
K9 Contact (Non-Bite)	1	• The K9 did not apprehend the subject.
Strike	5	• Subjects continued to resist, resulting in officers moving on to other force options.
Takedown	1	• The subject went down to the ground but continued to resist.
Taser Discharge	3	• For two subjects, the probes did not make contact. • For one subject, the probe spread was not enough to result in compliance.

Table 5. Reasons for Ineffective Force Types

Injuries

Definitions

Officers are required to include information about subject injuries and treatments in their incident reports. They are also required to include injury and treatment information as they relate to uses of force in their Blue Team modules. Subject injuries that occurred prior to or during police contact and were not a result of SPD's use of force are not included in this report. Force-related injuries for this report have been defined as:

Minor Injury – a physical injury as defined by ORS 161.015 that does not require any form of evaluation or treatment.

Moderate Injury – a physical injury as defined by ORS 161.015 and requires medical evaluation and/or treatment. The injured person does not need to be admitted to the hospital for the force-related injuries.

Serious Injury – a serious physical injury as defined by ORS 161.015 and requires admittance to the hospital for the force-related injuries.

Death – The injured person dies as a result of the use of force.

Officers are also required to obtain medical assistance as soon as it is safe to do so for subjects who, after having force used on them, have sustained physical injury reasonably requiring medical attention, have complained of injury, and/or have sustained serious physical injury or have been rendered unconscious. Officers are able to select from the following list of medical treatments for force-related injuries:

- EMT Treated and Released at the Scene
- ER Cleared for Jail
- Admitted to Hospital for Use of Force Injuries
- Evaluated and Confirmed Deceased
- Refused Medical Treatment
- Treated During Non-Use of Force Hospital Admittance
- Treated and Cleared for Jail by SMJ Medical Staff

Subject Injuries

Out of 139 incidents involving use of force, 34 resulted in injury to the subject(s) (24.4%). No subjects experienced serious physical injury, and one subject experienced death following an officer-involved shooting.

Subject Injury Type	Number of Incidents	Percentage of Total Injuries
Minor Injury	18	52.9%
Moderate Injury	15	44.1%
Serious Injury	0	0.0%
Death	1	3.0%
Incidents Involving Injury	**34**	**100%**

Table 6. Subject Injuries Resulting from Use of Force

While some injuries can be easily tied to a force type (i.e. a dog bite), other injuries are more difficult to associate with one specific force type. Force events are often dynamic situations, and an injury may be discovered after a prolonged encounter involving multiple officers and multiple force types. Table 7 displays what force types were used during events that resulted in subject injury. For example, control holds were used 190 times overall and were used during 14 incidents where the subject was injured. Out of these 14 incidents involving subject injury, nine involved a minor injury and five involved a moderate injury.

Force Type	Number of Incidents with Injury Where the Force Type was Used	Injury Severity	Number of Incidents with Injury Severity	Total Number of Times that Force Type was Used
Control Hold	14	Minor	9	190
		Moderate	5	
Firearm Discharge	1	Death	1	1
Takedown	16	Minor	11	66
		Moderate	5	
Push/Shove	8	Minor	4	33
		Moderate	4	
Strike	6	Minor	3	20
		Moderate	3	
K9 Bite	5	Minor	1	5
		Moderate	4	

Hobble	1	Minor	1	8
K9 Contact (Non-Bite)	1	Moderate	1	2
Taser – Discharge	1	Minor	1	3

Table 7. Force Types and Subject Injuries

Table 8 displays subject injuries and their associated severities. For example, there were 24 use of force events that resulted in an abrasion/laceration to the subject(s). Out of the 24 events where an abrasion/laceration was reported, 14 events resulted in an overall minor injury to the subject while 10 resulted in an overall moderate injury to the subject.

Injury Type	Number of Force Incidents Resulting in the Injury	Injury Severity	Injury Severity Counts
Abrasion/Laceration	24	Minor	14
		Moderate	10
Concussion	1	Moderate	1
Complaint of Pain	12	Minor	6
		Moderate	6
Bone Fracture	1	Moderate	1
Dog Bite	3	Moderate	3
Gunshot Wound	1	Death	1
Bruise	1	Minor	1
Unconsciousness	1	Moderate	1
Total Number of Injury Types	**44**	**-**	**-**

Table 8. Subject Injury Types and Severities

There were fewer incidents in 2025 that resulted in subject injury compared with 2024. Appendix 2 provides additional analyses of injuries and their relationship with force types and recent trainings.

Officer Injuries

Officers are not required to include information about their injuries within the Blue Team modules, and this report does not address injuries sustained by officers outside of force usage. However, some officers chose to disclose the injuries they sustained from using force. Out of the 139 incidents involving use of force, officers reported 18 incidents where they were injured (12.9%) from using force.

Officer Injury Type	Number of Incidents	Percentage of Total Injuries
Minor Injury	16	88.9%
Moderate Injury	2	11.1%
Serious Injury	0	0.0
Death	0	0.0%
Incidents Involving Injury	**18**	**100%**

Table 9. Officer Injuries Resulting from Use of Force

Officer injuries related to force usage are similar to subject injuries in that some cannot be directly tied to a specific force type. Table 10 displays what force types were used during events that resulted in officer injury. For example, takedowns were used 66 times overall and were used during seven incidents where the officer was injured. Out of these seven incidents involving officer injury, six involved a minor injury and one involved a moderate injury.

Force Type	Number of Incidents with Injury Where the Force Type was Used	Injury Severity	Number of Incidents with Injury Severity	Total Number of Times that Force Type was Used
Takedown	7	Minor	6	66
		Moderate	1	
Control Hold	10	Minor	9	190
		Moderate	1	
Strike	6	Minor	5	20
		Moderate	1	
Push/Shove	4	Minor	4	33
K9 Bite	1	Minor	1	5
Hobble	2	Minor	2	8
Taser – Discharge	1	Minor	1	3

Table 10. Force Types and Officer Injuries

Table 11 displays the officer injury types and their overall injury severities. For example, there were 13 force events where an officer reported an abrasion/laceration. Out of these 13 events with a reported abrasion/laceration, 11 resulted in an overall minor injury to the officer while two resulted in an overall moderate injury to the officer.

Injury Type	Number of Force Incidents Resulting in the Injury	Injury Severity	Injury Severity Count
Abrasion/Laceration	13	Minor	11
		Moderate	2
Internal Injury	4	Minor	3
		Moderate	1
Complaint of Pain	5	Minor	4
		Moderate	1
Total Number of Injury Types	**22**	**-**	**-**

Table 11. Officer Injury Types and Severities

There was no significant change in the number of use of force incidents resulting in officer injury in 2025 compared with 2024; however, the comparison is difficult since officers are not required to disclose their injuries in Blue Team force modules.

Use of Force Events and Police Officer Holds

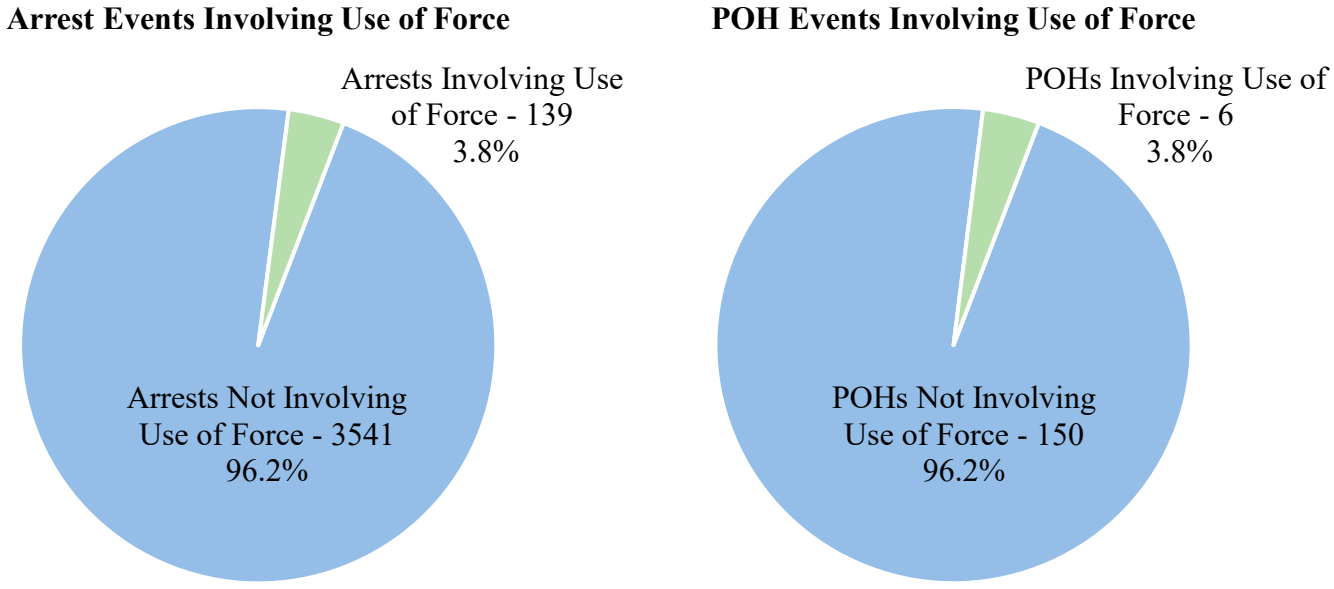
In accordance with ORS 426.228 (1), a police officer may take into custody any person who the officer has probable cause to believe is dangerous to himself/herself or to any other person and who the officer has probable cause to believe is in need of immediate care, custody, or treatment for mental illness.

There were 156 police officer holds (POHs) in 2025, and 6 of these incidents (3.8%) involved use of force[4]. As shown in Table 12, police officer holds have increased over the last 5 years, but the number of these holds that have involved force has decreased. This decrease in force-related police officer holds may be attributed to the increase in crisis intervention training and an increase in emphasis for team tactics.

Year	Number of POHs	POHs Involving Use of Force	% of POHs Involving Use of Force
2021	141	18	13%
2022	127	15	12%
2023	114	8	7.0%
2024	152	8	5.2%
2025	156	6	3.8%

Table 12. Yearly POHs Involving Use of Force

Figure 8. Uses of Force During Arrests and Police Officer Holds



[4] Directors holds have been included in POH counts. A Director's Hold is a hold placed on an individual by a qualified mental health professional from the county's Mobile Crisis Services (MCS) team. There were no Director's Holds that resulted in use of force in 2025.

De-Escalation

De-Escalation with Use of Force

De-Escalation data was made mandatory in April 2025, and, overall, de-escalation data was entered for 134 force events. Out of the 134 force events where de-escalation data was entered, there were 23 events where officers indicated that de-escalation was not safe, feasible, or prudent (all officers on scene selected 'de-escalation not feasible'). There were 28 events where some officers attempted de-escalation and others indicated that de-escalation was not safe, prudent or feasible.

There are eight de-escalation types in Blue Team. Table 13 displays these types and their usages.

De-Escalation Type	Frequency
Contacted Friends and/or Family	16
CNT[5] Deployed	4
Separated Disputing Parties	18
Maintained Distance	67
Offered Transport to Hospital	11
Attempted to Build Rapport	128
Attempted to Establish Dialogue	185
Offered CAHOOTS	7
None – Not Safe, Prudent, or Feasible	91

Table 13. De-Escalation Types and Their Usages (Frequencies)

Police Mental Health Calls and CAHOOTS

CAHOOTS has served Springfield as a mobile mental health crisis service unit since January 2015. Hours of operation for CAHOOTS services have varied over the years, but on July 7th, 2024, CAHOOTS changed their operating hours from 24 hours/day to 12 hours/day. Figures 9 and 10 display the number of CAHOOTS-primary calls for service and CAHOOTS-secondary[6] calls for service prior to and following the change in service hours. The change in CAHOOTS service hours has placed more responsibility on officers to respond to mental health incidents when CAHOOTS is unavailable.

[5] CNT – Crisis Negotiation Team. The crisis negotiation team is a special assignment team comprised of eight SPD personnel (sworn and non-sworn) who receive special training for resolving high-risk situations through communication and negotiation. Each CNT team member receives 40 hours of initial training. The team receives 80-136 hours of maintenance training per year and trains collectively 8 hours per month.

[6] CAHOOTS-secondary calls for service are calls where patrol was dispatched as the primary unit, but, after evaluating the needs of the involved subject(s), CAHOOTS was called in to help resolve the issue.

Figure 9. Quarterly CAHOOTS-Primary Calls for Service

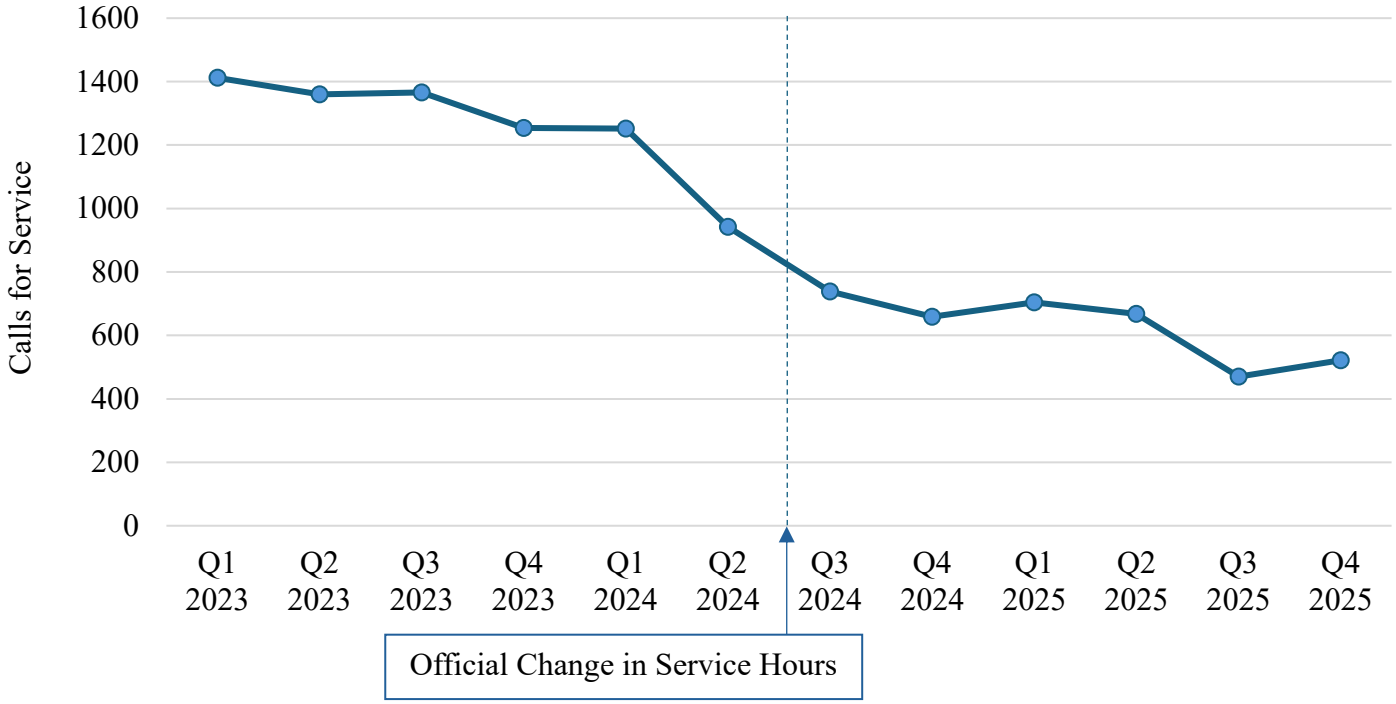
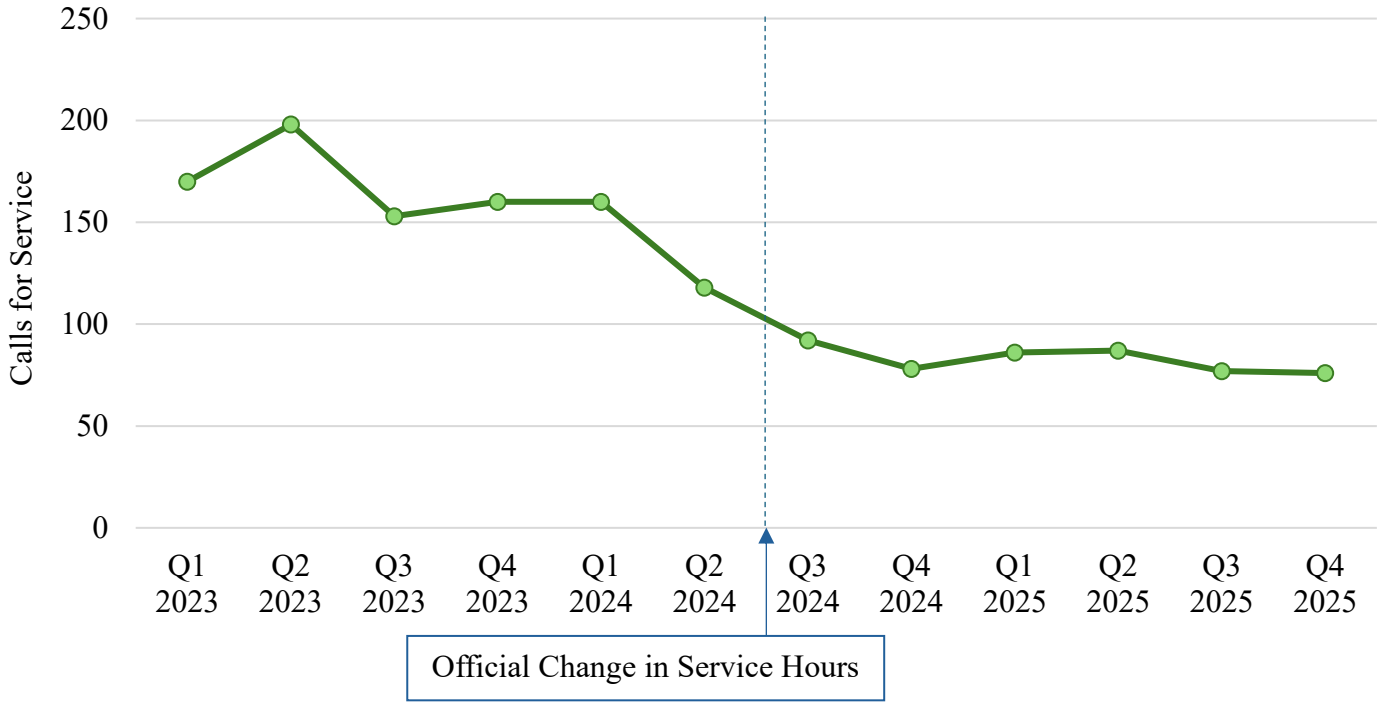


Figure 10. Quarterly CAHOOTS-Secondary Calls for Service



Policy, Training, and Equipment

Policy Changes and Revisions

Post use of force incident responsibilities were moved from General 1.5.1 into their own section, 1.5.3. All requirements and content related to use of force policy remained unchanged in 2025.

Training

Table 14 details the force-related training conducted by SPD personnel in the 2025 calendar year.

Training	Hours	Personnel
Control Tactics	8	All Sworn Personnel
Firearms	16	All Sworn Personnel
Critical Incident Training	40	New or Previously Untrained Dispatch, Jail, and Sworn Personnel
Crisis Negotiation Team Training	96	All CNT Personnel
De-escalation Types Definitions Training	0.5	All Sworn Personnel
Total Force-Related Training Hours	160.5	-

Table 14. Force-Related Trainings

Appendix 2 provides an analysis of how force-related training impacted force usage in 2025.

Equipment

SPD did not adopt any new force-related equipment in 2025.

Force Review Committee

One FRC is in progress regarding the officer-involved shooting that occurred in 2025.

Springfield Municipal Jail

Overview

In 2025, the Springfield Municipal Jail (SMJ) booked 1,847 adults into custody from the following agencies: Springfield Police Department, Eugene Police Department, Junction City Police Department, Coburg Police Department, and the Cottage Grove Police Department. SPD is prohibited from participating in any immigration enforcement according to Springfield Municipal Jail Policy Manual Section 6 (Adults in Custody: Intake and Release) and Oregon House Bill 3265.

Updates

The Springfield Municipal Jail was accredited through the Oregon State Sheriff's Association in 2025. As part of this accreditation process, the jail policy manual was updated and increased accountability measures were implemented to better document adult in custody (AIC) movements, improve AIC safety, care, programs, and activities, and enhance jail staff training requirements. Additionally, SMJ sergeants were issued body worn cameras in 2025 to better capture force events, cell extractions, uncooperative custody interactions, and any other incidents that could benefit from video review.

Training

SMJ personnel received 21 hours of force-related training in 2025 – 5 hours of control tactics training and 16 hours of firearms training. Their control tactics training covered the following topics:

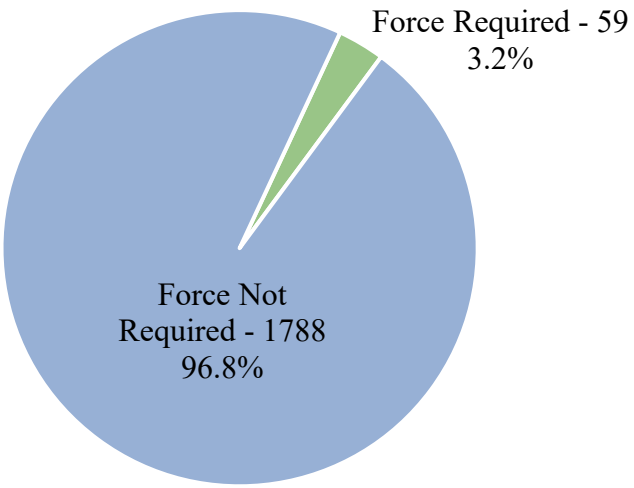
- Use of force policy review
- Striking and striking defense
- Takedowns and standing-to-ground tactics
- Ground grappling with handcuffing techniques
- Hobble fundamentals and techniques
- Choke defenses
- Restraint chair usage

General Statistics

In 2025, SMJ employed 12 detention officers and five detention sergeants[7], and, on average, each detention member was involved in seven use of force events. SMJ booked 1,847 adults into custody in 2025, and SMJ personnel were involved in 59 use of force events overall.

[7] Not all jail personnel were employed for the entirety of the 2025 calendar year. The 12 officers and five sergeants include employees who retired, resigned, promoted, and were hired within the year.

Figure 11. Jail Bookings Requiring Force



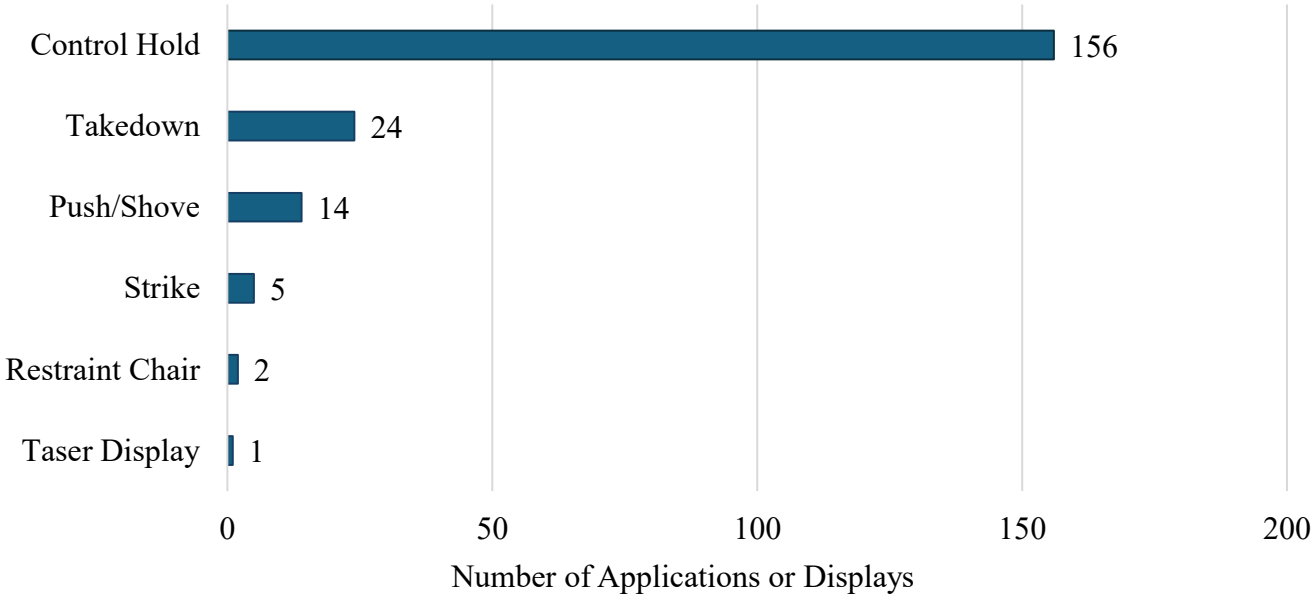
Year	Bookings	Bookings Involving Use of Force	% of Bookings Involving Use of Force
2021	1380	50	3.6%
2022	1395	40	2.9%
2023	1743	53	3.0%
2024	2091	56	2.7%
2025	1847	59	3.2%

Table 15. Year-to-Year Jail Bookings and Force Events

Force Types and Effectiveness

The types of force used and shown by SMJ members have been broken down into the following six categories. More takedowns and pushes/shoves were used in 2025 compared with 2024, and fewer strikes were used in 2025 compared with 2024.

Figure 12. Jail Force Type Counts



Force Type	Uses/Shows	Effective Uses/Shows	Ineffective Uses/Shows	2025 Effectiveness (%)	2024 Effectiveness (%)
Control Hold	156	152	4	97.4%	99.3%
Takedown	24	23	1	95.8%	100%
Push/Shove	14	14	0	100%	100%
Strike	5	5	0	100%	90.0%
Restraint Chair	2	2	0	100%	100%
Taser Display	1	1	0	100%	100%
Total	**202**	**197**	**5**	**97.5%**	**98.6%**

Table 16. Jail Force Type Effectiveness

Recommendations

Following the analysis of the 2025 use of force data, SPD makes the following recommendations. The intent of these recommendations is to reduce force incidents and produce safer interactions between the community and SPD. For example, evaluating force incidents specific to the Springfield Municipal Jail environment can lead to developing training and tactics tailored to those conditions. Providing guidelines about how to input the effectiveness of force will lead to more accurate data for future analysis. Finally, examining the connection between the Control Tactics trainings and decrease in force can help SPD determine the most effective frequency and content of that training.

Analysis 1: Detention Officers in the Springfield Municipal Jail may also use force to protect public safety, maintain order, and affect an arrest. Jail use of force is dictated by the SPD Use of Force policy (General Order 1.5.1), and jail staff are required to participate in annual force-related trainings.

Recommendation 1: Provide additional analyses related to jail use of force to determine if and how training, tactics, equipment, and policy may be improved.

Analysis 2: In Blue Team, officers designate whether the force they used was effective or ineffective. Their reasonings for why force was effective or ineffective are subjective and depend on a variety of factors.

Recommendation 2: To facilitate more accurate analyses with respect to ineffective uses of force, SPD will provide guidelines to help officers determine what makes a use or show of force effective or ineffective. The subsequent data will be used to improve trainings that address specific elements related to ineffective force options.

Analysis 3: Use of force events involving injuries have decreased since the most recent two Control Tactics trainings.

Recommendation 3: Continue to review force events to determine if there are aspects of certain techniques (control holds, takedowns, and pushes/shoves) that can continue to be trained to improve force event outcomes.

Appendix 1

Multi-Year Force Comparison

Since 2021, the annual number of use of force events has decreased while the annual number of show force events has increased (Figure 13). Individual applications and shows of force have also increased (Figure 14). These increases in show of force events and individual displays of force could be indicative of greater efforts at de-escalation through the show of a tool or weapon. Appendix 2 addresses the increase in applications of force.

Figure 13. Yearly Use and Show of Force Events

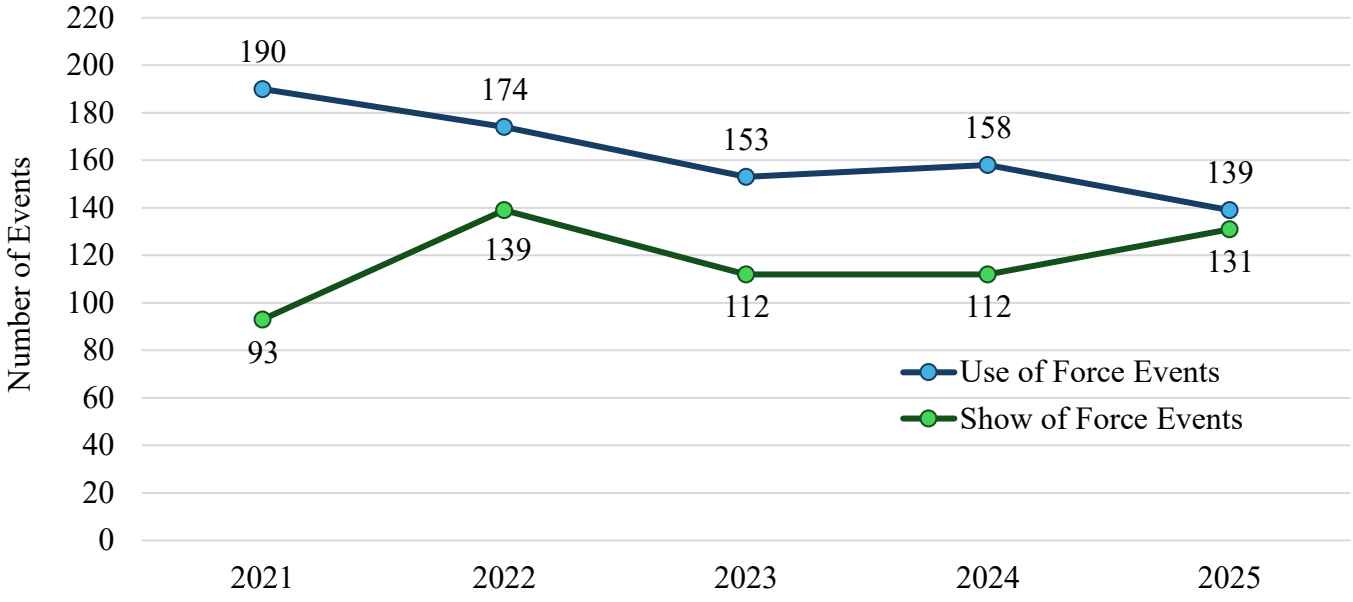
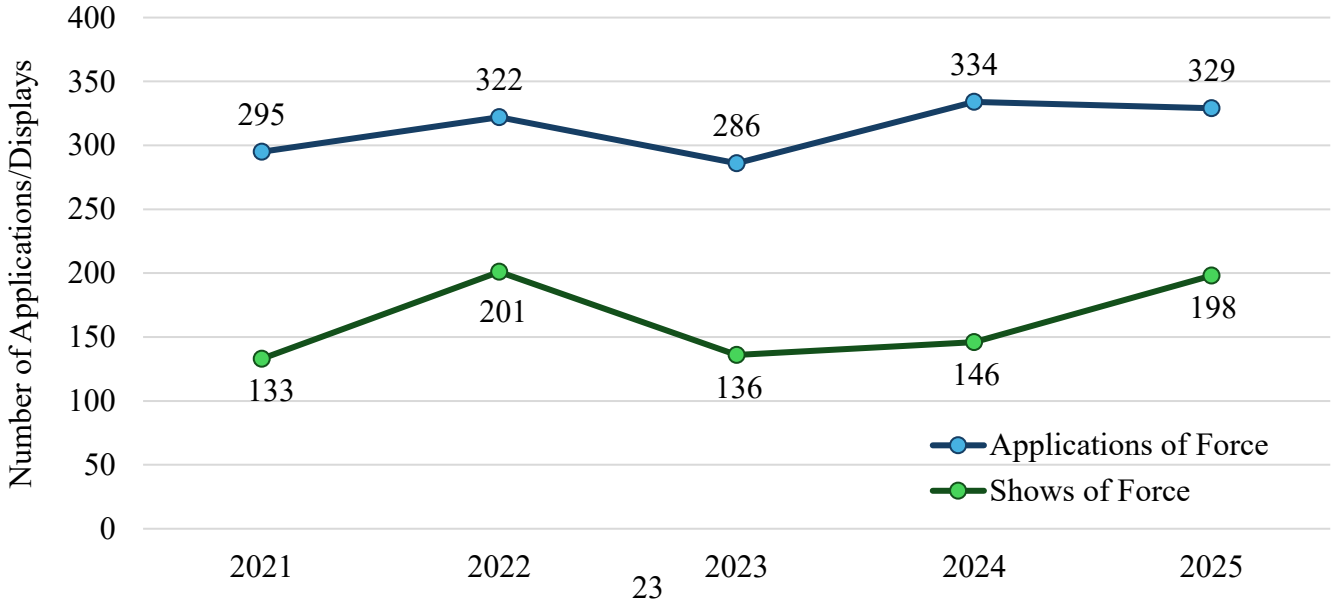


Figure 14. Yearly Applications and Shows of Force



	2025	***2024***	***2023***	***2022***	***2021***
Total Calls for Service	43,823	47,945	49,027	49,921	50,157
Police dispatched calls for service	30,150	31,931	31,119	29,431	28,779
Calls resulting in use of force	139	158	153	174	190
Calls resulting in show of force	131	112	112	139	93
Percentage of calls resulting in use of force	0.5%	0.5%	0.5%	0.6%	0.66%
Percentage of calls resulting in show of force	0.4%	0.4%	0.4%	0.5%	0.32%
Incidents Involving Arrest	3,680	4,113	3,478	3,303	3,483
Percentage of arrest incidents involving use of force	3.8%	3.8%	4.4%	5.3%	5.46%
Percentage of arrest incidents involving show of force	3.6%	2.7%	3.2%	4.2%	2.67%
Individuals Arrested	2,647	2,851	2,488	2,219	2,244
Arrested individuals involved in a use of force	138	159	139	168	187
Arrested individuals involved in a show of force	137	114	115	146	-
Percentage of arrested individuals involved in a use of force	5.2%	5.6%	5.6%	7.6%	8.3%
Percentage of arrested individuals involved in a show of force	5.2%	4.0%	4.6%	6.6%	-
SPD police officer holds	156	152	114	127	141
Police officer holds involving use of force	6	8	8	15	18
Percentage of police officer holds that resulted in a use of force	3.8%	5.3%	7.0%	12%	13%

Table 17. Overall Calls for Service and Use/Show of Force Breakdown

Appendix 2

2024 Recommendation 1 – Applications of Force, Injuries, and Training

Analysis 1 for 2024 Use of Force Report: Officers did not engage in significantly more use of force events in 2024 compared to 2023. However, they utilized more force options during these events, which led to fewer and less severe injuries.

In 2024, SPD noticed a decrease in use of force events and little change in the overall number of force options used during these events. There was also a decrease in the number of injuries sustained by subjects with a slight increase in the severity of those injuries. SPD continued to analyze force-related data to discover if any correlations existed between the increase in force options, the reduction in injury severity, and the material covered in the Control Tactics trainings.

Similar to 2024, 2025 saw a decrease in use of force events and an increase in use of force applications. While force reporting and tracking processes have evolved since the adoption of Blue Team in 2021, officers have been trained on techniques and tactics that involve multiple force applications. For example, officers learned two takedown techniques that involve (at least) two officers. If/when officers choose to use these techniques, more takedowns will be logged since more officers will be involved. There are also takedown techniques that involve follow-through with control holds in order to maintain control of combative subjects and provide easier access to handcuffing. Officers who use these techniques and accurately track them will log additional force types (control holds) into Blue Team. Table 18 displays how the number of force options used per force event has evolved over the last five years.

Year	Use of Force Events	Number of Force Applications Used	Average Number of Force Applications Used per Force Event
2021	190	295	1.55
2022	174	322	1.85
2023	153	286	1.87
2024	158	334	2.11
2025	139	329	2.37

Table 18. Force Applications per Force Event

As shown in Table 19, there was a 23% increase in the number of show of force-only events (events where officers did not move on to using force) in 2025 compared with 2024. This increase could indicate an increase in officers' efforts at attempting de-escalation and gaining compliance through the display of a tool prior to physical engagement. There was also a 12% decrease in the number of use of force-only events (events where no displays of force were utilized as a precursor to the application(s) of force), which may indicate a greater number at these successful de-escalation attempts/displays of force.

Year	Use of Force Only Events	Show of Force Only Events	Events with Both Use and Show of Force
2022	160	125	14
2023	134	93	19
2024	138	92	20
2025	121	113	18

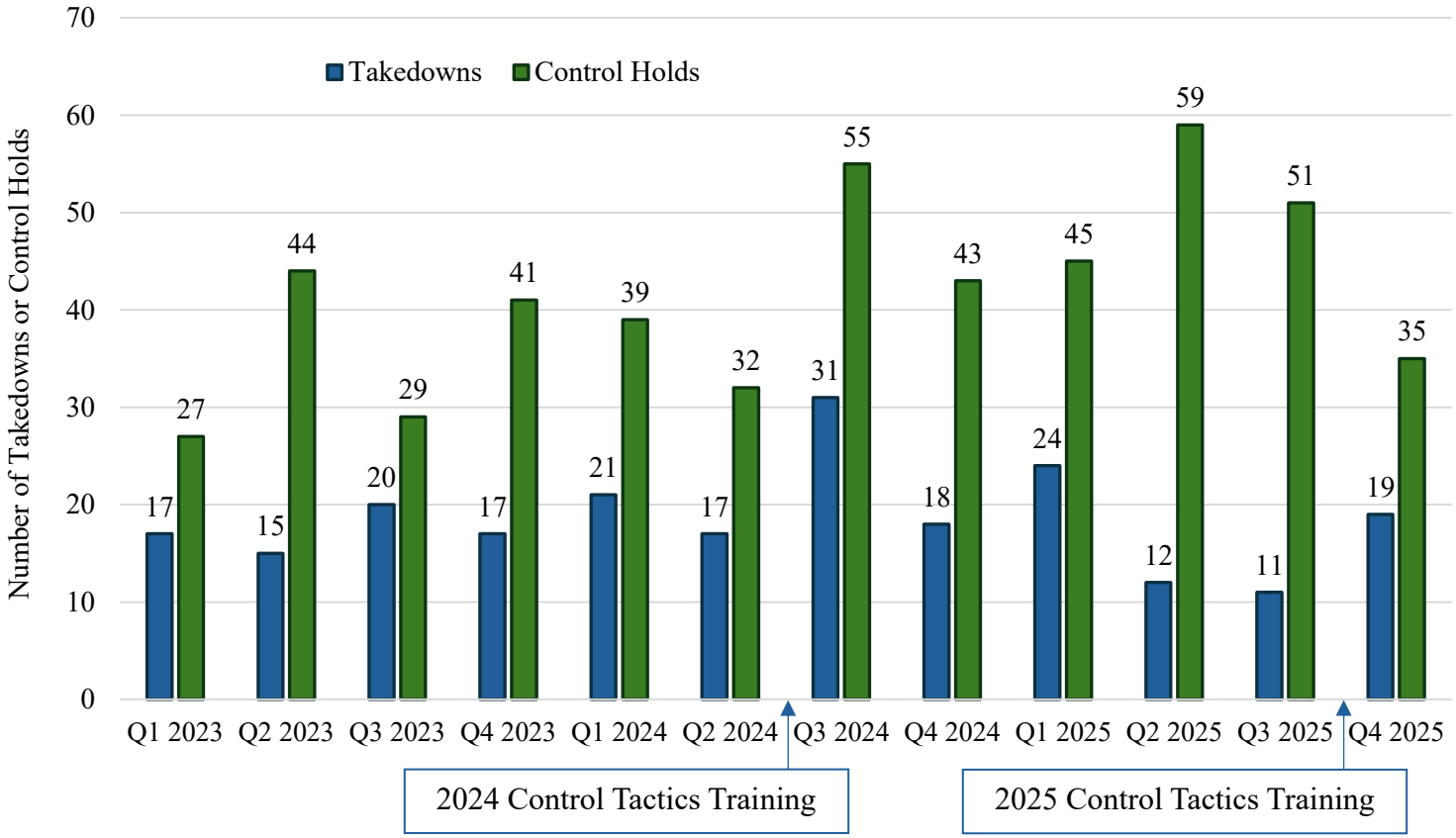
Table 19. Use and Show of Force Events

SPD's Control Tactics team held department-wide trainings in April/May 2024 and October 2025. Both the 2024 and 2025 trainings covered:

- Positional asphyxia and the Lateral Recovery Restraint technique
- Body alignment (posture, structure, and base) and positioning (prone versus supine)
- Hobble fundamentals and techniques
- Hidden arm extraction
- Takedowns and standing-to-ground tactics

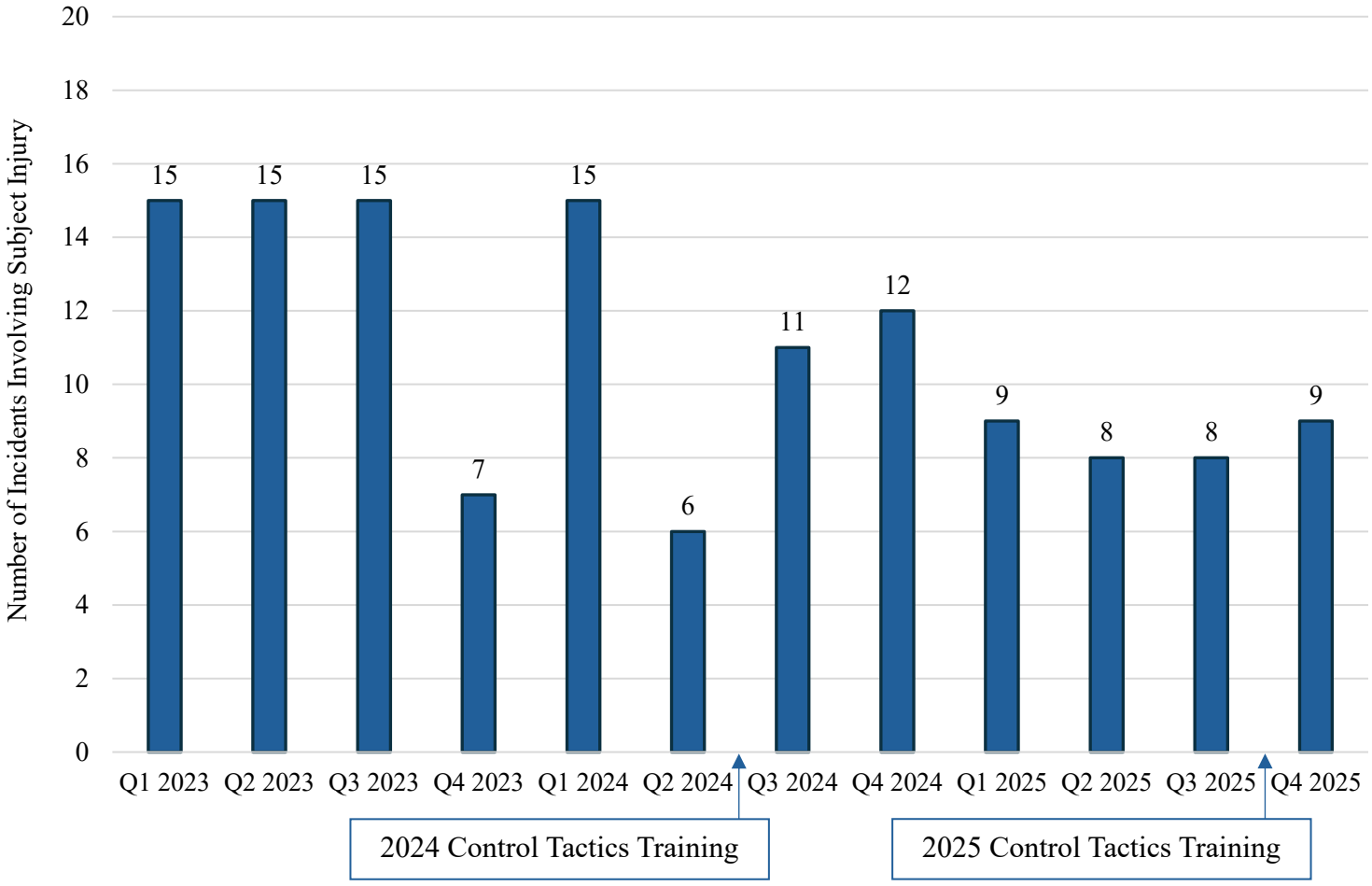
Immediately following these two trainings, SPD observed increases in the number of reported takedowns and control holds (except for control holds following the October 2025 training).

Figure 15. Takedowns and Control Holds per Quarter



For the six quarters leading up to the training, the average number of incidents involving subject injury per quarter was 12.2. For the six quarters following the training, the average number of incidents involving subject injury per quarter was 9.5. Figure 16 shows this decrease in injuries per quarter over the last 3 years.

Figure 16. Events Resulting in Subject Injury per Quarter



Appendix 3

2024 Recommendation 2 – Subject Resistances

Analysis 2 from the 2024 Use of Force Report: Officers' selections of *type of resistance encountered* in their Blue Team reports can vary based on their understanding of the options available.

Officers were trained on the resistance type definitions to create consistent reporting. The options in Blue Team were modified and the updated data collection period began on July 1st, 2025. 121 use and/or show of force events were submitted after this date and using the new options. Figure 17 displays what types of resistances were encountered during these 121 events, and Figure 18 displays how many force events involved an armed subject versus an unarmed subject.

Figure 17. Resistance Types per Force Event

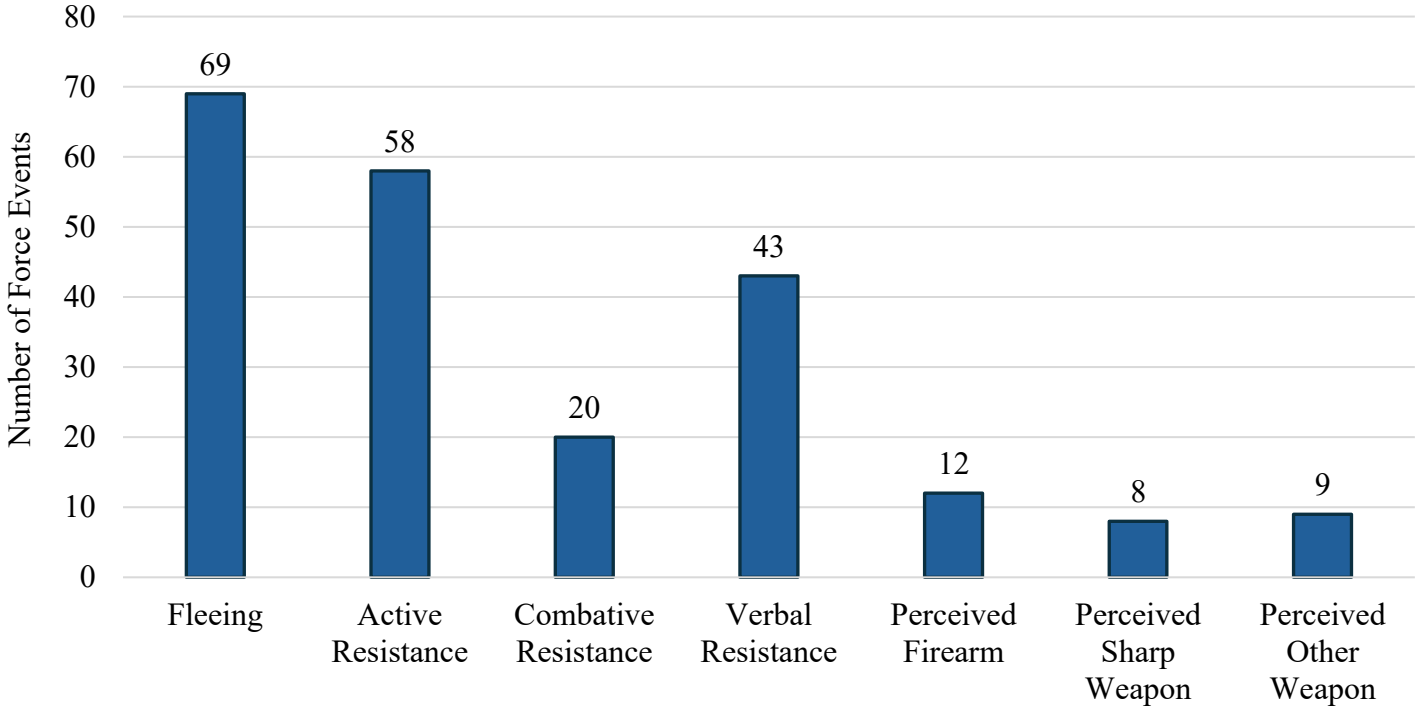
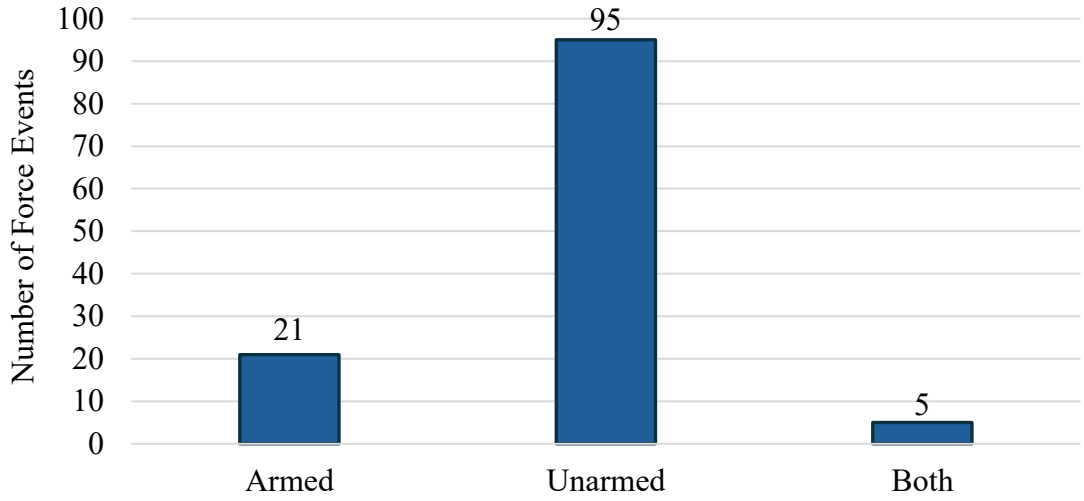


Figure 18. Armed/Unarmed Force Events



Officers make show and use of force decisions based on the information they have at the time, and confirmation of a weapon often comes after the subject has force used on them and/or is taken into custody. For example, an officer may see a black object in the shape of a firearm protruding from someone's waistband. The officer makes a decision for using or showing force and later learns that the object was an airsoft gun. The justification for the officer's decision to use or show force will be based on his/her perception of the situation, not based on the confirmed presence of a real firearm. Nonetheless, in order to track the armed/unarmed status of subjects who have force used on/shown to them, SPD has added a dropdown menu separate from the resistance list where officers may select whether the subject was confirmed to be armed or unarmed.

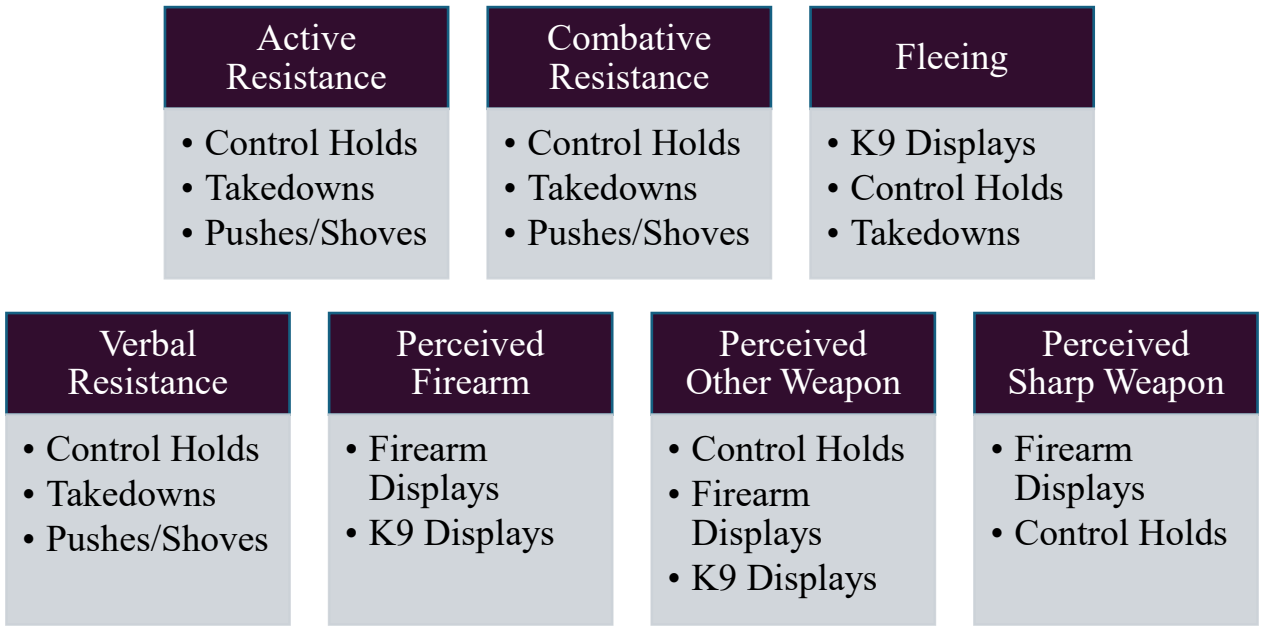
There were five incidents where officers who used and/or showed force selected different options for the subject's armed status, and Table 20 addresses these discrepancies.

Case	Reason for Armed Status Discrepancy
1	The primary officer selected 'armed' after locating a weapon on the subject. The officer who selected "unarmed" was not present for the search and did not know about the recovery of the weapon.
2	There were two subjects involved in this incident. One was armed and one was unarmed.
3	The subject was armed when the primary officer contacted him. The subject had been separated from his weapon and was no longer armed by the time the cover officer arrived on scene.
4	Error.
5	The subject had an item that one officer understood to be a weapon based on the subject's history and current mental state, but the other officers on scene did not have the same assessment.

Table 20. Armed Status Discrepancies

Figure 19 displays which force types were most commonly used to address the different resistance types. Control holds, takedowns, firearm displays, and K9 displays were the most common force types used to combat resistance across the board.

Figure 19. Most Common Force Types for Subject Resistances



Appendix 4

2024 Recommendation 3 – Incidents without Use of Force

Analysis 3 from the 2024 Use of Force Report: The majority of calls for service involving potentially dangerous subjects or those experiencing mental health crisis did not result in use of force.

Police calls for service that could have, but did not, result in use of force are difficult to track and inherently subjective. SPD identified and examined 20 calls for service that did not result in use of force. These calls represented a variety of natures (disorderly subjects, disputes, DUIIs, etc.) and involved multiple officers with different backgrounds and varying levels of law enforcement experience. When safe, prudent, and feasible, officers often used the following methods and tactics to resolve these situations:

- Maintaining a calm tone of voice and demeanor
- Providing clear, concise instructions
- Acknowledging emotions and allowing the subject(s) to feel heard and seen
- Recognizing potential mental health crises
- Explaining crimes, consequences, and policies/procedures
- Exhibiting patience and slowing down the encounter

Out of these 20 incidents:

- 10 (50%) of the subjects were perceived to be under the influence of some form of intoxicant,
- 15 (75%) of the subjects exhibited some form of non-passive resistance (see appendix 3 for resistance types) prior to officers taking them into custody,
- 11 (55%) of the subjects have alerts in the police department's systems for being combative, known to carry weapons, and/or known to have a mental illness, and
- 4 (20%) subjects ended up being armed with a weapon.

Four (20%) of the 20 incidents started out as non-enforcement-related calls for service (welfare checks, fire department assists, etc.), while 16 (80%) started out as enforcement-related calls for service (disputes, disorderly subjects, traffic stops, etc.). Nine (35%) subjects ended up being taken into custody for police officers holds, which may be indicative of officer attunement to the subjects' mental health issues and the necessity of seeking medical treatment prior to taking enforcement action.

Officers are constantly using de-escalation tactics in their day-to-day interactions with members of the community. For the 20 incidents analyzed in this section, their tactics were successful at gaining subject cooperation; however, the subjects involved chose to comply. Successful de-escalation requires both officer attempts and subject acceptance/compliance, and there are occasions when subjects do not choose to comply.

Overall, the information in this appendix will be shared with the Control Tactics team to be considered for future training and SPD will continue to incorporate this type of analysis about incidents that did not result in force into future use of force reports.

SPRINGFIELD OREGON POLICE DEPARTMENT

2025 USE OF FORCE SUMMARY

2025 CALLS FOR SERVICE

CALLS FOR SERVICE: 43,823

COUNTER/PHONE[1]: 1,007

CSO & ACO[2] RESPONSE: 3,888

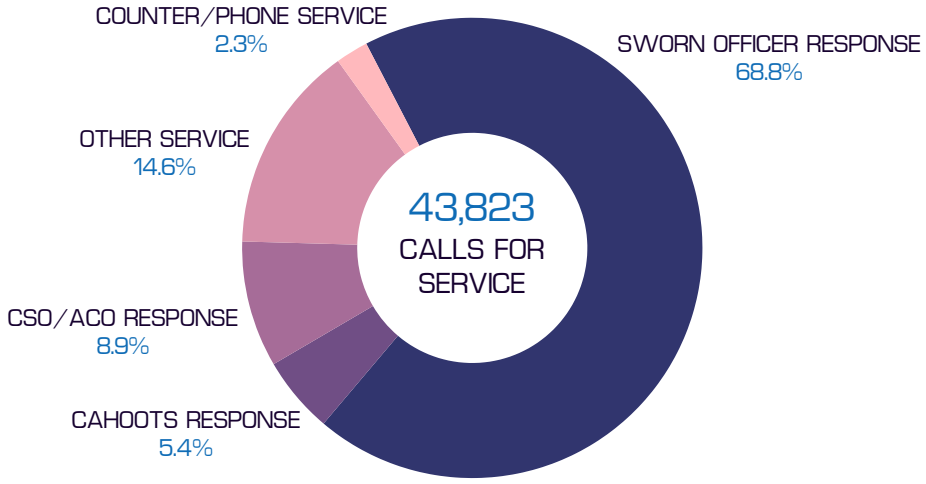
CAHOOTS: 2,364

OTHER[3] SERVICE: 6,414

POLICE: 30,150

ARRESTS: 3,680

USE OF FORCE EVENTS: 139



0.5% OF POLICE OFFICER CALLS FOR SERVICE RESULTED IN USE OF FORCE

0.3% OF TOTAL CALLS RESULTED IN USE OF FORCE

TOOLS, METHODS, AND TYPES OF FORCE

USES OF FORCE								
Control Hold: 190	Takedown: 66	Push/Shove: 33	Strike: 20	Hobble: 8	K9 Bite: 5 Non-Bite[4]: 2	Taser Discharge: 3	Firearm Discharge: 1	40mm Discharge: 1

329 Applications of Force

SHOWS OF FORCE						
K9 Display: 98	Firearm Display: 75	Taser Display: 20	OC/Presidia Gel[5] Display: 2	Pepperball Display: 1	Bean Bag Display: 1	40mm Display: 1

198 Shows of Force

ARRESTS AND POLICE OFFICER HOLDS

3,946 Arrestees
+
156 Police Officer Holds[6]

329 Applications of Force

34 force incidents involving subject injury
- 1 fatality
- 0 hospitalizations

18 force events involving officer injury
- 0 fatalities
- 0 hospitalizations

3.7% OF ARRESTEES AND 3.8% OF POLICE OFFICER HOLDS RESULTED IN USE OF FORCE

TERMINOLOGY

1 - Counter/Phone: reports and calls for service taken by records and other staff via telephone or front counter contact.

2 - CSO/ACO: Community Service and Animal Control Officers are non-sworn, unarmed staff who respond to various public service calls.

3 - Other: Calls for service that involve other SPD personnel, originate from another agency, or are not dispatched.

4 - K9 Non-Bite: Contact between subject and K9 when the K9 is muzzled.

5 - Presidia Gel: a CS-based restraint that projects in a stream instead of an aerosol spray.

6 - Police Officer Holds: Custodies that are transported to a hospital because they are in need of immediate care and are a danger to themselves or others (ORS 426.228).