



## Environmental Quality Commission

Through the Air Quality Program, Attn: Jill Inahara  
811 SW 6<sup>th</sup> Ave  
Portland, OR 97204-1390

Dear Chair Blosser and the Environmental Quality Commission,

The Town of Lakeview (Lake County) requests the Environmental Quality Commission designate Lakeview as a sustainment area. On July 25, 2013, the Oregon DEQ described potential proposed rules that would provide a community like Lakeview with more flexibility in the DEQ permitting process called the sustainment area rules. These rules would allow the Lakeview area to be classified as a sustainment area. In order for the Lakeview area to be considered a sustainment area, it would need to meet four proposed criteria. We believe Lakeview meets these criteria and have provided the following information for the Environmental Quality Commission to consider.

### 1) Monitoring data

Recent monitoring data indicates the Lakeview area is at risk of violating the PM<sub>2.5</sub> daily standard of 35 ug/m<sup>3</sup>. A summary of the monitoring data for 2006-2012 is provided below. The rolling three year average of the 98<sup>th</sup> %ile shows Lakeview just at the standard.

### 2) Sustainment area boundary

Based on discussions with DEQ, we would recommend the boundary for the sustainment area be the urban growth boundary. The UGB includes all potential areas where an industrial source could be located considering current zoning restrictions that could affect the Lakeview airshed. This would be consistent with the current PM<sub>10</sub> maintenance area boundary. We did discuss expanding the area to a larger boundary but decided not to create a larger boundary because the existing zoning requirements would not allow large industry to locate outside the urban growth boundary as an outright use. Additionally, any sources that might locate outside the urban growth boundary would likely not have a significant impact of particulate matter at the monitor.

3) Priority Sources

DEQ has identified woodstoves as the priority source of emissions in the area. Based on DEQ's current evaluation of PM2.5 emission impacts it suggests that 75% of problem comes from woodstoves. The monitoring information also shows that exceedances of the standard occur during the wintertime, which is when woodstove use is predominant. In addition, the nephelometer data shows a diurnal pattern that is consistent with woodstove use.

4) Reasons for Sustainment

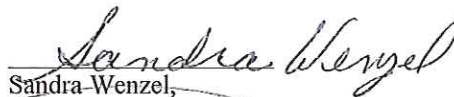
Declaring the area as a sustainment area would be beneficial because it supports much needed economic development in the area while improving air quality at the same time. Being classified a sustainment area also serves as a useful tool regarding the area's participation in the PM Advance program. The sustainment area rules could be included as a potential strategy in the PM Advance plan.

Based on the elements discussed above, we would like the Environmental Quality Commission to consider designating the Lakeview area as a sustainment area.

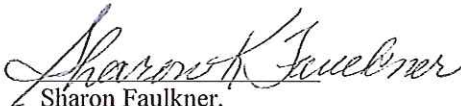
Sincerely,



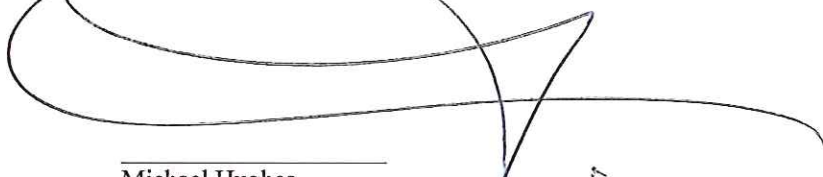
Mike Patrick,  
Mayor, Town of Lakeview



Sandra Wenzel,  
Council Member, Town of Lakeview



Sharon Faulkner,  
Council Member, Town of Lakeview



Michael Hughes,  
Council Member, Town of Lakeview



Mike Warren,  
Council Member, Town of Lakeview



Brad Winters,  
Lake County Commissioner



Ken Kenstner  
Lake County Commissioner



Dan Shoun,  
Lake County Commissioner