From:	WILLIAMS Karen
To:	Infrastructure2018
Subject:	FW: Your review of my Gorge strategy reference
Date:	Tuesday, August 14, 2018 17:04:36

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From: SAKATA Rachel
Sent: Tuesday, August 14, 2018 2:54 PM
To: WILLIAMS Karen <WILLIAMS.Karen@deq.state.or.us>
Subject: RE: Your review of my Gorge strategy reference

Let me guess, the comment either came from the Friends of the Gorge or NRDC.

You can also point to the information in the Regional Haze report that shows the long term trend for the Gorge shows positive improvement in visibility over time for both the haziest and clearest days. P. ii of exec summary or Figure 4.

Otherwise, your language looks good!

From: WILLIAMS Karen
Sent: Tuesday, August 14, 2018 2:47 PM
To: SAKATA Rachel <SAKATA.Rachel@deq.state.or.us>
Subject: Your review of my Gorge strategy reference

Any chance you have time to look at this before you head home today?

Comment 6

The Columbia River Gorge National Scenic Area is already severely impaired by air pollution. The Gorge stands among the most polluted places in the country, including Pittsburgh and Los Angeles. A 2005 joint study by the U.S. Forest Service and National Park Service studied twelve federally managed areas around the West and found that the Columbia River Gorge National Scenic Area and Sequoia National Park had by far the worst “annual standard visual range[s]” of the twelve areas. Similarly, a 2000 Forest Service study of air quality monitoring data from 39 federally managed “visibility protected” areas in the West found that the Scenic Area has “the highest levels of haze” and “the sixth worst visibility pollution of these areas.” Gorge air quality has been monitored for the last twenty years. The Forest Service has documented that visibility impairment occurs on at least 95% of the days that have been monitored. While there is no lack of data on the air quality issues in the NSA, there is a lack of

action on the part of DEQ to remediate the issues. Friends asks that DEQ reevaluate its air quality programs and set enforceable limits so that unmitigated haze is no longer the scourge of the National Scenic Area.

Response

DEQ's infrastructure plan, submitted as Attachment 1 in the Rulemaking Notice, lists Oregon Administrative Rule 340-223 (Regional Haze Rules) as one element of DEQ's air quality program to maintain compliance with the 2015 ozone standard. Regional Haze Rules protect and restore visibility in Class I wilderness areas in Oregon; while the Columbia Gorge National Scenic Area is not a Class I area, the Gorge NSA is located between two Class I areas – Mt. Hood and Mt. Adams (Washington) Wilderness Areas, and DEQ expects that the Gorge NSA visibility will benefit from Oregon's and Washington's long-term regional haze progress. DEQ worked with the Columbia River Gorge Commission and Washington state to develop an air quality strategy for the Gorge. DEQ implements that strategy and tracks progress through the Regional Haze Plan and Regional Haze Plan Progress Reports. Although it is not required, DEQ tracks Gorge visibility conditions along with Class I area conditions and if DEQ finds that Gorge visibility is not improving, DEQ will reassess and consider how to modify its Gorge strategy. DEQ submitted the most recent required Regional Haze progress report to EPA in July 2017 which EPA approved in May 2018 as adequate to meet the state's visibility goals. DEQ's Regional Haze progress report is available here:
https://www.oregon.gov/deq/aq/Pages/Haze.aspx
DEQ did not change the infrastructure or interstate transport SIP submissions, but acknowledges the importance of the issue – visibility in the Gorge NSA – the commenter has raised.

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