

Nonattainment Areas

[Oregon.gov](#)

Nonattainment means that a geographic area has not consistently met the clean air levels set by the U.S. Environmental Protection Agency in the National Ambient Air Quality Standards. Legal descriptions of these areas are available in Oregon Administrative Rules, [Chapter 340, Division 204-0010](#).

Current nonattainment areas in Oregon

PM_{2.5}

Klamath Falls

- [Overview](#)
- [Klamath Falls 2020 Exceptional Event EPA Concurrence Request](#)
- [2006 24-Hour PM_{2.5} Standards](#) (EPA website)
Oregon's recommendations for 2006 24-hour standard PM_{2.5} designations and EPA's responses
- [EPA's 2006 24-hour PM_{2.5} standard](#)
Final designations for Oregon
- [Presentation to EQC Klamath Falls Oct. 22, 2009](#)

Oakridge PM_{2.5} Nonattainment Area

DEQ oversees the Oakridge PM_{2.5} Nonattainment Area, under the authority of the [Lane Regional Air Protection Agency](#)

- [Oakridge 2020 PM_{2.5} Exceptional Event EPA Concurrence Request](#)

PM₁₀

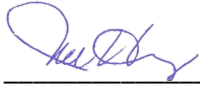
DEQ oversees the Oakridge PM₁₀ Nonattainment Area, under the authority of the [Lane Regional Air Protection Agency](#)

- [Oakridge 2020 PM₁₀ Exceptional Event EPA Concurrence Request](#)

Clean Air Act
No Effect Determination

The City of Florence's Responsible Entity (RE) and has made the following determination regarding the Regional Housing Rehabilitation Program of Lane County (RHRP) Florence Project #H21009 regarding the applicable Clean Air Act.

The service area for the RHRP does include an area of air quality non-attainment for Oakridge. However based on our correspondence with the Lane Regional Air Protection Agency (LRAPA) and response letter received from LRAPA, it is determined that the rehabilitation activities pose no adverse effect.



Certifying Officer

January 10, 2022

Date

Joe Henry, Mayor, Responsible Entity
Name & Title



October 22, 2021

Andy Clay
Program Manager
Regional Housing Rehabilitation Loan Program (RHRP)
Home of Your Own Program (HOYOP)
St. Vincent de Paul
P.O. Box 24608
Eugene, OR 97402

Re: HUD Clean Air Act and LRAPA Requirements for the RHRP of Lane County project in the City of Florence and other areas of Lane County, OR

Andy:

Based on St. Vincent de Paul Society of Lane County's proposed housing rehabilitation project located at various locations in the City of Florence and other areas of Lane County, OR, consisting of no new construction and no new parking spaces, the Lane Regional Air Protection Agency (LRAPA) has determined the following:

- An Indirect Source Permit is not required under Title 20 of LRAPA's Rules and Regulations since there will be less than 250 parking spaces added.
- The project is not subject to any requirements to obtain an Air Contaminant Discharge Permit (ACDP) under Title 37 of LRAPA's Rules and Regulations, and
- The project is located in an area designated as being in attainment for all criteria pollutants. The City of Florence is in an area that is a designated as attainment for all pollutants, and the proposed activity will not result in emissions that exceed de minimis or thresholds emission levels for criteria pollutants. The Oakridge, Oregon area is currently designated as non-attainment for PM2.5, however the any projects in that service area will also not result in emissions that exceed de minimis or thresholds emission levels for criteria pollutants.
- Asbestos testing and removal activities must be conducted in accordance with LRAPA's [Title 43 – Asbestos Requirements](#).

Please let me know if you need anything additionally in the matter.

Sincerely,

Max Hueftle, P.E., BCEE
Operations Manager

Air Quality (CEST and EA)

General Requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93
Reference		
https://www.hudexchange.info/environmental-review/air-quality		

Scope of Work

- 1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

Yes

→ Continue to Question 2.

No

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Air Quality Attainment Status of Project's County or Air Quality Management District

- 2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

No, project's county or air quality management district is in attainment status for all criteria pollutants

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Yes, project's management district or county is in non-attainment or maintenance status for one or more criteria pollutants.

Describe the findings:

→ Continue to Question 3.

3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Explain how you determined that the project would not exceed *de minimis* or threshold emissions.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ Continue to Question 4. Explain how you determined that the project would not exceed *de minimis* or threshold emissions in the Worksheet Summary.

4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The owner occupied housing rehabilitation program does not do new construction or conversion of land for development. (See Tab A "Program Description) Oakridge Oregon is a non-attainment area within our program service area, but as per consultation with Lane Regional Air Protection Agency there are no adverse impacts that would require mitigation under LRAPA rules. (See Tab K "LRAPA CCA Compliance Letter" dated 10/22/2021)

Are formal compliance steps or mitigation required?

Yes

No

CLEAN AIR ACT

Consultation with Lane Regional Air Protection Agency (LRAPA)

From: Max Hueftle <max@lrpa.org>
Sent: Friday, October 22, 2021 11:05 AM
To: Andy Clay <andy.clay@svdp.us>
Cc: Sarah Moehrke <sarah.moehrke@ci.florence.or.us>; Erin Reynolds <erin.reynolds@ci.florence.or.us>; Joe Henry <joe.henry@ci.florence.or.us>
Subject: RE: Florence CDBG - Clean Air Act

Andy,

The signed LRAPA letter regarding the CDBG project is attached.

Please let me know if you need anything additionally.

Thanks,
Max

Max Hueftle, P.E., BCEE
LRAPA Operations Manager
Lane Regional Air Protection Agency
1010 Main Street
Springfield OR 97477

From: Andy Clay
Sent: Wednesday, October 20, 2021 1:18 PM
To: Max Hueftle <max@lrpa.org>
Cc: Sarah Moehrke <sarah.moehrke@ci.florence.or.us>; Erin Reynolds <erin.reynolds@ci.florence.or.us>; Joe Henry <joe.henry@ci.florence.or.us>
Subject: RE: Florence CDBG - Clean Air Act

Your timing looks just fine to me Max.

Thank you kindly

Andy Clay

(541) 501-0894 cell

From: Max Hueftle <max@lrpa.org>
Sent: Wednesday, October 20, 2021 1:14 PM
To: Andy Clay <andy.clay@svdp.us>
Cc: Sarah Moehrke <sarah.moehrke@ci.florence.or.us>; Erin Reynolds <erin.reynolds@ci.florence.or.us>; Joe Henry <joe.henry@ci.florence.or.us>
Subject: RE: Florence CDBG - Clean Air Act

Hi Andy,

I can review this and get back to you later this week or early next week.

Let me know if you need something sooner.

Thanks,
Max

Max Hueftle, P.E., BCEE
LRAPA Operations Manager
Lane Regional Air Protection Agency
1010 Main Street
Springfield OR 97477

From: Andy Clay
Sent: Wednesday, October 20, 2021 12:26 PM
To: max@lrpa.org
Cc: Sarah Moehrke <sarah.moehrke@ci.florence.or.us>; Erin Reynolds <erin.reynolds@ci.florence.or.us>; Joe Henry <joe.henry@ci.florence.or.us>
Subject: Florence CDBG - Clean Air Act

Hello Max,

I left you a voice message looking to see if you may still be an appropriate contact at LRAPA regarding Clean Air, in hopes that you are, I thought I'd follow up with an email. Last year I consulted with you regarding a HUD sourced Community Development Block Grant (CDBG) that was awarded to the City of Creswell and now we are doing the same program with the City of Florence who has received a new CDBG award.

Below is a copy of the initial email I sent you when we were discussing the project for Creswell – I have tuned it up for Florence and hope to conclude with the same finding of No effect.

The CDBG funds are for the purpose of performing owner occupied housing rehabilitation and this program that we manage throughout Lane County is called the Regional Housing Rehabilitation Program (RHRP). The focus for the RHRP will be for Florence however the service area covers all of Lane County except for incorporated Eugene & Springfield. Within the service area, we are aware that the City of Oakridge is presently listed as a non-attainment area. While the specific project locations are not yet determined, there could be an applicant from Oakridge, however we do not believe that the proposed activities would lead to an increase in air pollution or that it would expose humans to increased air pollution. Please refer to the attached "RHRP Program Description" document for a highlighted list of typical rehabilitation activities.

As per our conversation, I want to specifically address indirect impacts such as traffic or parking. Under the RHRP, there will be no work performed to create additional parking for the owner occupied residences, the program primarily focuses on repairs to the dwelling itself and shall have no impact regarding traffic.

We are completing an Environmental Review for compliance with HUD standards and the Clean Air Act applies. Please let me know if you need additional information for your review. We are asking for your comments about the proposed RHRP activities and/or your concurrence that the proposal would have no effect on the non-attainment area (Oakridge) air quality.

Please when you reply, reply to all, as I have also copied staff with the City of [Florence](#) including [those Cc'd in this message, Joe Henry](#) who is the responsible entity for the Environmental Review. Our correspondence will be incorporated to the Environmental Review Record.

Thanks again,

Andy Clay

Program Manager

Regional Housing Rehabilitation Loan Program (RHRP)

Home of Your Own Program (HOYOP)

St. Vincent de Paul

(541) 501-0894 cell

(541) 743-7128 direct

(541) 683-9423 fax

NMLS# 791356