

# Isabelle Spohn

Thank you for your work on behalf of the public.

First, I am in total agreement with the EPA's strengthening of the primary annual PM 2.5 standard from 12  $\mu\text{g}/\text{m}^3$  to 9  $\mu\text{g}/\text{m}^3$ . Doing what we can to protect the health of not only humans, but also wildlife, in these challenging times of changing climate is of great importance.

I'm a full-time resident and registered voter in Okanogan County, having lived here since 1978. Although I'm concerned with Air Quality in the entire county, my primary concern is for the Methow Valley because I live here. My concern also stems from our very sensitive air shed, which is subject to the frequent inversions typical of a high mountain valley, particularly during the winter. And in the upper Methow, these inversions can be as low as the roof of a home, with woodsmoke smoke sometimes entering homes in the neighborhood through closed windows. Although PM2.5 from wildfire is largely not controllable by humans, we can control to some degree the human impacts during other times of the year that contribute to the annual average.

I do agree with noting and considering exceptional events such as wildfires in your calculations regarding attainment/nonattainment issues.

## The Omak Monitor: Boundaries of Attainment areas

I have read in the enclosed documents that "Consideration of geography or topography can provide additional information relevant to defining non attainment area boundaries. The EPA recommends that analyses examine the physical features of the land that might define the air shed and, therefore, affect the formation and distribution of PM2.5 concentrations over an area. Mountains or other physical features may influence the fate and transport of emissions and PM2.5 concentrations. Additional analyses may consider topographical features that cause local stagnation episodes via inversions."

However, I have also read that "The EPA recommends that the boundaries of attainment/unclassifiable areas generally not be smaller than a county."

First, we need to consider that Okanogan County is larger than 3 of the smallest states in the USA. This fact alone should indicate that special consideration of the boundaries of attainment areas in this county is appropriate. In addition, our county includes numerous air sheds, water sheds, and various ecosystems from shrub-steppe to high mountains and valleys - all of which create various and differing impacts upon meteorology and air quality.

In the case of the Omak monitor and any questions arising from its data, I contend that the Methow Valley and the Okanogan Valley are two discreet, adjacent air sheds and water sheds with very different topography and populations. They are separated by the Okanogan Range. The Methow has high mountains and is narrow and winding, creating a challenging situation for modeling and collection of data especially during winter when inversions are more severe and wood stoves are in use. Omak and the Okanogan Valley, on the other hand, is more subject to the impacts of a larger

human environment. Both, of course, are affected unpredictably and often separately by PM 2.5 from wildfire.

In deciding issues of attainment/non-attainment, these two valleys should be considered separately for the above reasons.

In respect to any necessary use of baseline data, I suggest that WDOE/EPA review the air quality studies (including monitoring and computer modeling) conducted by the EPA in order to comply with Regional Forester Jeff Sirmon's 7/05/84 Record of Decision addressing the Early Winters Winter Sports Study in regards to air quality (focusing especially upon woodstove and fireplace usage at the proposed resort.) Accurate baselines are especially important due to the potential impacts upon the adjacent Pasayten and Sawtooth Wilderness areas (Class 1 air) - particularly if PSD increments are an issue in future applications.

#### Public Input and Advertisement of Opportunities to Comment

Thank you especially for the very useful documents that were provided for this comment period. However, should WDOE/EPA desire any substantial amount of public input from the Omak or Okanogan County areas, I would suggest advertising hearings in a manner that would encourage this input. The general populace is not accustomed to regularly viewing the website of WDOE in case there are statewide issues to which they would want to respond. A good practice would be to advertise such a hearing in the county's newspaper of record (Currently the Omak Chronicle, sometimes the Methow Valley News - on a year-to-year basis) so that the general populace would be aware. It could include reference to the WDOE website for details. I only became aware of this opportunity to comment because I listened in (over Zoom) to a recent Okanogan County Commissioners' meeting.

Thanks once again for your attention to public health and the environment in Washington State.

Sincerely yours,  
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