



OFFICE OF EXTERNAL CIVIL RIGHTS COMPLIANCE

WASHINGTON, D.C. 20460

December 19, 2024

Via Email

In Reply Refer to:

EPA Complaint No. 10NO-14-R10

Travis Knudsen
Executive Director
Lane Regional Air Protection Agency
1711 Willamette Street
Suite 301, #51
Eugene, OR 97401
travis@LRAPA.org

Dear Director Knudsen:

This letter is to notify you that the U.S. Environmental Protection Agency (EPA) Office of External Civil Rights Compliance (OECRC) has determined that the Lane Regional Air Protection Agency (LRAPA) has fully complied with the Informal Resolution Agreement (Agreement), dated September 20, 2019, between LRAPA and OECRC, resolving to EPA Complaint No. 10NO-14-R10. Accordingly, OECRC is closing the monitoring of the Agreement and closing the Complaint as of the date of this letter.

Pursuant to Section III of the Agreement, LRAPA has submitted to OECRC evidence that it has satisfied its obligations under the agreement: 1. by providing to the public instructions for filing environmental complaints which it has also translated into appropriate languages (other than English) that are spoken by people living within LRAPA's service area;¹ 2. by providing Complainant representatives an opportunity to review current air quality monitoring efforts and to provide input on the proposed locations for placement of monitors;² 3. by operating at least four air sensors within the West Eugene

¹ See <https://www.lrapa.org/air-quality-protection/current-aqi/file-an-air-quality-complaint/air-quality-complaint-form/>. The environmental complaint form is in both English and Spanish throughout.

² LRAPA staff met with Complainant representatives on November 4, 2019 to review the LRAPA air monitoring networks, and the PurpleAir sensors. Complainant representatives agreed to help LRAPA identify citizens in the Bethel area willing to participate with PurpleAir sensors at their residences. LRAPA also held a community follow-up meeting on June 4, 2020. LRAPA, in partnership with the University of Oregon, described the use of these sensors and how stakeholders can access and assess information from this network. This information is more localized than that available via regulatory-grade air monitors. Following that meeting, LRAPA Public Affairs staff were contacted by 7 residents living in the Bethel neighborhood interested in allowing a PurpleAir sensor to be installed on their property. Their addresses were compiled and studied for best distribution throughout the neighborhood. Due to the COVID-19 pandemic, this meeting needed to be postponed from its original March 2020 deadline. An additional LRAPA inperson/virtual Citizen Advisory Committee meeting occurred July 26, 2022, and was entirely devoted to sharing purple air data from the sensors installed in West

industrial corridor; 4. by making air quality data available on its website;³ and 5. by hosting community meetings.

Pursuant to Section III of the Agreement, LRAPA has also satisfied its commitments by developing and posting the following on LRAPA's public website: 1. a notice of nondiscrimination; 2. grievance procedures; 3. designating and naming a nondiscrimination coordinator; 4. language access procedures; 5. public participation process/policy; 6. disability access procedures; and 7. a plan for training appropriate staff of LRAPA's nondiscrimination procedures.

The closure of monitoring and the Complaint does not affect LRAPA's continuing responsibilities under Title VI, Section 504, 40 C.F.R. Parts 5 and 7, and, as applicable, other federal nondiscrimination laws.⁴ Nor does closure of monitoring affect EPA's investigation of any other Title VI or other federal civil rights complaint or address any other matter not covered by the closure. This letter is not a formal statement of EPA policy and should not be relied upon, cited, or construed as such.

I thank you and all of your staff for your cooperation in this matter. If you have any questions, please contact me by telephone at (202) 564-8796 or by email at hoang.anhthu@epa.gov.

Sincerely,



Anhthu Hoang
Acting Director
Office of External Civil Rights Compliance
Office of Environmental Justice and
External Civil Rights

cc: Ariadne Goerke
Deputy Associate General Counsel
Civil Rights & Finance Law Office

Eugene. During this CAC meeting, LRAPA provided an overview of the varying forms of monitoring in Lane County, showed the location of air monitors and PurpleAir sensors, reviewed the Air Quality Index guidelines, demonstrated ways to access and review air quality information from PurpleAir sensors (and others), and finally reported the data collected from PurpleAir sensors installed in West Eugene following Subsections III.B.-G. of the Agreement and compared it to other areas in Eugene.

³ For information regarding air quality monitoring see <https://www.lrapa.org/air-quality-protection/current-aqi/air-quality-monitor>. This page also provides multiple methods of accessing Lane County PurpleAir sensor data.

⁴ See Title VI of the Civil Rights Act of 1964, 42 United States Code §§ 2000d to 2000d-7 (Title VI); Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794; Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§ 1681 et seq.; Age Discrimination Act of 1975, 42 U.S.C. §§ 6101 et seq.; Federal Water Pollution Control Act Amendments of 1972, Pub. L. 92-500 § 13, 86 Stat. 903 (codified as amended at 33 U.S.C. § 1251 (1972)); 40 C.F.R. Parts 5 and 7.

Dan Opalski
Deputy Regional Administrator
Deputy Civil Rights Official
U.S. EPA Region 10

Beverly Li
Regional Counsel
U.S. EPA Region 10