



LITTLE TRAVERSE BAY BANDS OF ODAWA INDIANS
Environmental Services Department

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Jay Bortzer, Chief
Air Programs Branch (A-18J)
United States Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

December 12, 2007

Re: 24-Hour Fine Particulate Matter National Ambient Air Quality Standard
Designations

Mr. Bortzer,

The Little Traverse Bay Bands of Odawa Indians is providing recommendations for the new 24-hour fine particulate matter (PM 2.5) National Ambient Air Quality Standard (NAAQS) designation of the Band's 1855 Treaty-delineated Reservation. The revised 24-hour PM 2.5 NAAQS may provide improved protection of human health and wellbeing across the United States and in Indian Country. The Little Traverse Bay Bands of Odawa Indians (Band) welcomes the opportunity to contribute to stronger human and environmental health-based air quality standards.

The Little Traverse Bay Bands of Odawa Indians 1855 Treaty-delineated Reservation (Reservation) is located in the northern portion of Michigan's Lower Peninsula. The Band's federally recognized Reservation covers approximately 336 square miles of land and includes the northeastern shoreline of Lake Michigan. Along with the rest of the northernmost portion of Michigan's Lower Peninsula, the Reservation is not included in any regulatory ambient air monitoring network. This area is characterized as rural or small city and currently designated as Attainment/Unclassified for PM 2.5 NAAQS. The closest PM 2.5 monitors are located approximately 70 to 100 miles from the Band's Reservation: at the Sault Ste. Marie Tribe of Chippewa Indians Reservation (80 mi.), Bay Mills Indian Community Reservation (70 mi.), Seney National Wildlife Refuge (80 mi.), Houghton Lake (77 mi.), and the Little River Band of Ottawa Indians Reservation (100 mi.).

Due to the absence of on-Reservation monitoring, explicit ambient air quality information is unavailable for the Little Traverse Bay Bands of Odawa Indians Reservation. Therefore, the Band recommends that the 1855 Treaty-delineated Reservation and

surrounding Emmet and Charlevoix Counties be designated as **Unclassifiable** for the 24-hour PM 2.5 NAAQS.

The Little Traverse Bay Bands of Odawa Indians is working to better understand and protect Northern Michigan air quality and plans to contribute to future ambient air monitoring efforts in presently Unclassifiable areas. The Band hopes to work with the US EPA to ensure the protection of ambient air quality in Northern Michigan.

Thank you for your time and consideration of our comments. If you have any questions or comments, please contact me at 231-242-1425. You may also contact the Little Traverse Bay Bands of Odawa Indians Environmental Services Director, Rachel Schwarz, at 231.242.1571.

Sincerely,



Robin Clark
Air Quality Specialist
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Cc: Rachel Schwarz, Director, Environmental Services, Little Traverse Bay Bands of Odawa Indians
Stephanie Cheaney, Project Officer, Air and Radiation Division, EPA Region 5