

March 16, 2004

Mr. Tony Talton **Tribal Air Program Coordinator** U.S. EPA Region 6 1445 Ross Ave., Suite 1200 (6PD-S) Dallas, TX 75202-2733

Subject: Unclassifiable Designation Recommendation for PM2.5 Standard

Dear Mr. Talton:

In exercising our inherent sovereign authority over our airshed, Ysleta del Sur Pueblo recommends that all lands within the Ysleta del Sur Pueblo Indian Reservation be classified as unclassifiable areas for the PM2.5 NAAQS Standard. The entire lands within the Ysleta del Sur Pueblo Reservation boundaries shall be designated as unclassifiable, which are located in El Paso County, Texas.

Although no PM2.5 monitoring has been conducted on the Reservation, we believe that we meet the PM2.5 standard. The PM2.5 monitors located nearest to our Reservation, as listed on the Texas Commission on Environmental Quality (TCEQ) El Paso Area Monitor Summary Website, are El Paso Sun Metro (EPA site number: 48-141-0053) and El Paso UTEP (EPA site number: 48-141-0037). Both monitors are located approximately 12 miles north of Reservation lands.

In summary, factors that influence this recommendation for EPA classification as unclassifiable are as follows:

- There is a lack of sufficient PM2.5 monitoring data for El Paso County.
- There are no PM2.5 monitors on Tribal lands.
- Tribal lands are located within close proximity to the International Border and Ciudad Juarez, Mexico. Point and mobile emission sources, including vehicles idling at the Border crossings, contribute significantly to airshed degradation.

Ysleta del Sur Pueblo is located with an urban area, but has no major PM2.5
emission sources that would contribute to El Paso County being designated as
nonattainment for PM2.5.

If you have any questions regarding these recommendations please contact Mr. Timothy Smith at (915) 859-7913, ext. 141.

Sincerely,

Arturo Senclair Tribal Governor

Cc: Mr. Richard E. Greene, U.S. EPA Region 6 Administrator

Mr. Carl Edlund, U.S. EPA Region 6 Director of Multimedia Planning and Permitting Division

Ms. Julie McClintock, U.S. EPA Office of Air Quality Planning and Standards