



## SALT RIVER PIMA~MARICOPA INDIAN COMMUNITY

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June 2, 2010

Jared Blumenfeld, Regional Administrator  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, California 94105

RE: U.S. EPA National Ambient Air Quality Standards (NAAQS) 2006 24 Hr.  
PM 2.5 Designation

Dear Mr. Blumenfeld:

The Community is a Federally Recognized Indian Tribe located in the central portion of Arizona near the urban Phoenix Metropolitan region of Maricopa County. The impacts of air pollution are a significant concern to the SRPMIC primarily because of the Community's location relative to the City of Phoenix and other regional municipalities, and the prevailing conveyance of air pollution onto the Community. Further, the transport of ozone and Particulate Matter (PM) impact the health and welfare of our Community Members. However there are few sources of air pollution within the Community's boundaries.

The Community agrees with the US EPA's recent designation, dated May 10, 2010, of the SRPMIC as "attainment/unclassifiable" for the 2006 24-hour PM2.5 NAAQS. Air quality monitoring data collected by the Community's Air Quality Monitoring Network supports the designation of "attainment/unclassifiable" for the SRPMIC. Equally as important is US EPA's recognition that it is improper to include Sovereign Tribal Nations, such as the Community, in non-attainment areas based upon county boundaries or upon Core Based Metropolitan Statistical Areas (CBMSAs or MSAs). The Community urges US EPA, in all designations (for PM2.5, PM10, Ozone, etc.), to examine air quality monitoring data, tribal jurisdiction and boundaries, as well as the sources of the air pollution causing violations of the NAAQS, which often are not located in Indian Country. The Community believes that the Community's jurisdictional boundaries, recognized by the Federal Government, define the SRPMIC air shed/air quality control district. The Community does not support inclusion of the Community in an air shed defined by county boundaries or CBMSAs/MSAs that were drawn without accounting for the Community's sovereign status nor the unique trust relationship that Tribal Nations have with the Federal Government.

The Community appreciates the opportunity to submit this recommendation regarding the 24-hour PM2.5 NAAQS designation and looks forward to working in partnership with the US EPA to address the air quality within the Community and on a regional level as well. The Community relies upon stable and adequate funding from US EPA Region IX in order to monitor and assess air quality within our boundaries and to implement air quality controls for local sources of air pollution. Should you or your staff have any questions or concerns with the comments they may be addressed with Ondrea Barber, Environmental Protection & Natural Resources Manager at 480-362-7625 or [Ondrea.barber@srpmic-nsn.gov](mailto:Ondrea.barber@srpmic-nsn.gov).

Sincerely,

A handwritten signature in black ink that reads "Martin Harvier". The signature is written in a cursive style with a large initial "M".

Martin Harvier, Vice President  
Salt River Pima-Maricopa Indian Community

cc Stacy Gubser, Director of Community Development Department (CDD)  
File