

US EPA ARCHIVE DOCUMENT

Campo Band of Mission Indians

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December 28, 2011



Deborah Jordan
Director, Air and Radiation Division
United States Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105

Chairwoman Monique La Chappa
Vice Chairwoman Michelle Cuero
Secretary Annah Ceballos
Treasurer Marcus Cuero
Committee Steven Cuero
Committee Harry Cuero
Committee Benjamin Dyche

Re: Recommendation for the Designation of the Campo Indian Reservation for the 8-hour ozone National Ambient Air Quality Standard

Dear Ms. Jordan:

Thank you for the opportunity to submit a recommendation for the designation of the Campo Indian Reservation which is under the jurisdiction of the Campo Band of Mission Indians (Campo Band) for the 8-hour ozone National Ambient Air Quality Standard (NAAQS). The Campo Indian Reservation is located in an area of rural San Diego County on the far eastern edge of the county and bordering the United States/Mexico border. Elevation of the Reservation is approximately 4000 feet. There is no urbanization in the area, low commuter traffic, no major emissions sources, and few minor emissions sources. The Campo Indian Reservation has discrete jurisdictional boundaries separating the Reservation from other areas of San Diego County. The Campo Band is committed to protecting air quality on the Campo Reservation and recommends that the area within the external boundaries of the Reservation remain designated "Attainment" for the 8-hour ozone National Ambient Air Quality Standards (NAAQS). The Campo Reservation has been designated Attainment for the 8-hour ozone NAAQS since 2004, and no factors have changed affecting ozone formation, or ozone pre-cursor formation on the Reservation or in areas near the Reservation.

The Campo Reservation was recognized by the EPA as designated Attainment for 8-hour ozone levels as recently as August 30, 2011 according to U.S. EPA's website: "8-Hour Ozone Nonattainment Areas, Detailed Description of Certain Area Boundaries for Partial Counties As of August 30, 2011." Absent new data to the contrary, the Campo Reservation should remain designated Attainment for the 8-hour Ozone standard as any change from Attainment designation must be accompanied by new data indicating that the area designated is not in compliance with the NAAQS. In addition, according to Executive Order 13175 as well as EPA's Policy Directive on consultation with tribes dated December 20, 2011, for establishing air quality designations for tribes, any change in air quality designation requires, among other steps, government-to-government consultation with the tribes. The Campo Band also considered the following factors in making this recommendation for air quality designation for the Campo Indian Reservation:

- Air Quality Data. The Campo Indian Reservation currently does not have an air quality monitor for ozone. The nearest air quality monitor for ozone is on the

nearby La Posta Indian Reservation which shows the area is attaining air quality standards for the new 2008 8-hour ozone standard. This monitor is the nearest air quality monitor in the area with technical information available. That technical information indicates compliance with the 2008 ozone standard. The nearest monitor in the area that meets EPA regulatory monitoring criteria is in Alpine, California, approximately 35 miles away, and approximately 2000 feet lower elevation at 2000 feet above sea level. Data from this source is not representative of air quality on the Campo Reservation and cannot be used to access regulatory levels on the reservation is not representative of air quality on the Campo Reservation.

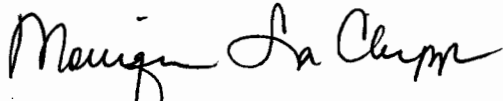
- Emissions related data. There are little or no emissions data on the Reservation. The Campo Band performed an Emissions Inventory in 2006 and found no major emissions sources within 65 miles of the Reservation, and no minor sources within 25 miles. The Campo reservation is more than 35 miles from the nearest measurable emissions sources in the area.
- Traffic and commuting patterns. There is one major arterial road through the Campo reservation, Interstate Highway 8 (I-8). Traffic volume is primarily tourist traffic traveling from San Diego through to Imperial Valley and Arizona. Vehicle traffic is low and estimated at approximately 800 vehicles per day. There is little commuter traffic, minor local traffic to stores and restaurants in the area.
- Population Density and degree of urbanization. The area is very rural, with no urbanization. Population density is estimated at 50 persons per square mile (urban fringe is recognized as a density over 20 times this density). No industrial and little commercial development occur on or near the Reservation, with no local Title V emissions sources.
- Meteorology. The prevailing winds on the Reservation are 30 mph from the west, southwest 60 % of the time, which keep the area clear of ozone pre-cursors.
- Geography/Topography. The nearest sources of ozone pre-cursors is Alpine, approximately 35 miles away, and approximately 2000 feet lower elevation at 2000 feet above sea level, and is not representative of air quality on the Campo Reservation. Alpine is on a ridgeline 30 miles east of San Diego and is presumed to be in a zone where ozone pre-cursors and an ozone mixing zone creates significant ozone levels. Alpine is considered by environmental professionals and agencies in San Diego County to have the highest ozone levels in Eastern San Diego County. Due to the terrain and geography in the area, technical experts presume that ozone levels peak at Alpine and then drop off dramatically east of Alpine. Absent monitoring data to indicate otherwise, ozone levels in rural eastern San Diego County are presumed to be meeting the 2008 ozone standards.

- The existing jurisdictional boundaries. The external boundaries of the Campo Indian Reservation separates Indian Reservation land from private, state and federal lands in San Diego County. The Campo EPA has jurisdiction over air quality on the Campo Reservation, while the State of California has jurisdiction over state, private, and federal lands in areas outside of the Campo Reservation. There is no metropolitan planning area that has jurisdiction over the Campo Reservation.

Thank you in advance for considering our recommendation. We look forward to working with EPA on a government-to-government basis to continue recognition of the Attainment status for the Campo Reservation for the 8-hour zone NAAQS.

If you have any questions, please do not hesitate to contact the Campo EPA Director, Melissa Estes, at 619-565-5650 or mestes@campo-nsn.gov.

Regards,



Monique La Chappa
Chairwoman