



Lone Pine Paiute-Shoshone Reservation

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October 8, 2009

Ms. Laura Yoshii,
Acting Regional Administrator
US EPA Region 9
75 Hawthorne Street – ORA-1
San Francisco, CA 94105

Subject: Area designation for 2008 Lead NAAQS for the Lone Pine Paiute-Shoshone Reservation

Dear Ms. Yoshii,

The Lone Pine Paiute-Shoshone Reservation (LPPSR) appreciates the opportunity to make a recommendation to the US Environmental Protection Agency on designation for the 2008 revised National Ambient Air Quality Standard (NAAQS) for lead.

The Lone Pine Paiute-Shoshone Reservation is a federally recognized Tribe and has “treatment as a state” status under the Clean Air Act. LPPSR is located in southern Inyo County, adjacent to the community of Lone Pine, California. The area is known as the Owens Valley and is in the Eastern California. Known as the “Deepest Valley”, the area is flanked by the 14,000 foot Sierra Nevada Mountains to the west, and the 12,000 foot Inyo Mountains to the east. The reservation consists of 237 contiguous acres, with an enrolled population of approximately 350 members.

In preparation of this recommendation the LPPSR Air Quality Department reviewed available ambient lead data for the region and throughout the state of California. LPPSR is aware that determining an area’s designation is based on comparison of the monitored lead concentrations, averaged for each three month period, to the level of the standard. If the concentration (known as the design value or the highest rolling three-month average) is higher than $.15 \mu\text{g}/\text{m}^3$, it violates the standard and the area is nonattainment.

Due to insufficient ambient lead monitoring data in the region, LPPSR is recommending a designation of unclassifiable for the Reservation.

Under the revised 2008 NAAQS, US EPA is requiring lead monitoring near industrial sources that emit at least 1 ton of lead per year. US EPA is also requiring monitoring in all Core Based Statistical Areas (CBSA's) with a population of at least 500,000. LPPSR will not meet either of the new monitoring requirements under the revised 2008 NAAQS. LPPSR is not in close proximity to any industrial sources emitting at least 1 ton of lead per year. The nearest industrial sources meeting the new monitoring requirement are located in Los Angeles County, approximately 180 miles to the southwest. Also, LPPSR does not lie within, nor is it tied through; economic, employment, or commuting patterns, to any CBSA with a population of at least 500,000. The nearest CBSA meeting the new monitoring requirement is Fresno, California. LPPSR lies approximately 40 miles east of Fresno and is isolated from the Fresno CBSA by the Sierra Nevada Mountain range, which has no through routes in the area.

Again, LPPSR recommends that the US EPA designate LPPSR as unclassifiable due to insufficient ambient lead monitoring data in the region. LPPSR appreciates the opportunity US EPA has given to make recommendations for the 2008 revised lead NAAQS area designation. Should you have any question regarding this recommendation please contact Mr. Justin Raglin, LPPSR Air Quality Coordinator, at: 760-876-4690.

Sincerely,

Richard Button, Tribal Chairman
Lone Pine Paiute-Shoshone Reservation

Cc: Mel O. Joseph, LPPSR Environmental Director
Asia Yeary, US EPA Project Officer