Saint Regis Mohawk Tribe

412 State Route 37
Hogansburg, New York 13655
Tel. 518-358-2272
Fax 518-358-3203

September 19, 2000

Kathleen C. Callahan, Director
US EPA, Region II
290 Broadway
New York, NY 10007-1866

RE: 8 Hour Ozone Designation for the St. Regis Mohawk Tribe

Dear Ms. Callahan,

In accordance with section 107(d) of the Clean Air Act (CAA) and 6103 of the Transportation Equity Act for the 21st Century (TEA-21 6103(a)), the St. Regis Mohawk Tribe (SRMT) makes the following designation for tribal lands contained within the exterior boundaries of the reservation (Map 1).

All lands contained within the exterior boundaries of the St. Regis Mohawk Reservation (SRMR) will be designated as in Attainment for the 8-hour National Ambient Air Quality Standards (NAAQS) for ozone. This designation is based upon 1996-1999 ozone data (Attachment 1) collected from four sampling sites, Jefferson County, two at Whiteface Mountain and Cornwall, Canada (Attachment 2).

Due to the rural nature of northern New York, the SRMT is not considered to be a part of a Metropolitan Statistical Areas (MSAs) or Consolidated Metropolitan Statistical Areas (CMSAs) (Attachment 3). Although Jefferson County was in violation for the 1997-1999 average, the Tribe does not expect to be affected due to wind patterns and dispersion.

The St. Regis Mohawk Reservation meets the NAAQS and does not contribute to ambient air quality in a nearby nonattainment area that does not meet the NAAQS. Although the SRMR meets the NAAQS for ozone, the area is affected by the long-range transport of emissions that contribute to ozone formation.

In order to maintain and prevent future deterioration of our good air quality, the St. Regis Mohawk Tribe's Environment Division has been participating in the northeast Regional Planning Organization (RPO) funded by the US EPA. Participants in the RPO will address long-range transport issues over the next several decades. In addition, the SRMT

Environment Division is currently developing a Tribal Implementation Plan that will include federally enforceable emissions limits for the NAAQS.

If you have any questions or concerns, please do not hesitate to contact the Environment Division at 518-358-6259.

Sincerely,

Alma Ransom

John Bigtree Jr.

Hilda Smoke

Harry Benedict

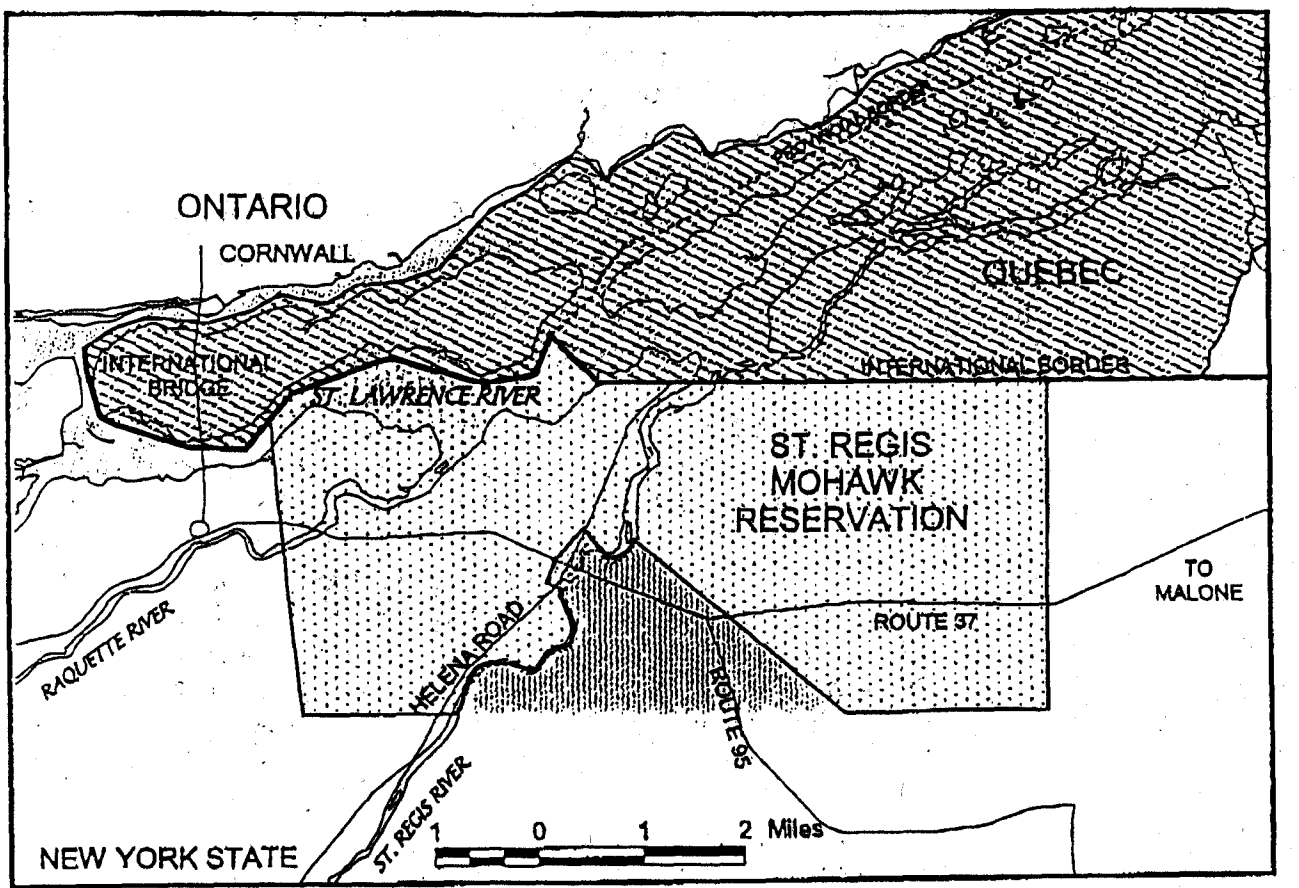
Paul Thompson

Richard Terrance

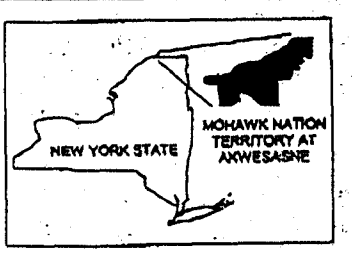
Encl.

cc: Ken Jock, SRMT
Joyce Barkley, SRMT
Mazeeda Khan, EPA

Map 1. Exterior Boundaries of the St. Regis Mohawk Tribe.



Canadian Portion of Akwesasne
St. Regis Mohawk Reservation
Hogansburg Triangle Land Claims
Rivers



Created by Kawennate
SRMT GIS Program
November 1999
UTM - Zone 18 - NAD 27

Attachment 1. Ozone Data.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

Joyce Barkley
St. Regis Mohawk Tribe
Environment Division
412 State Rt. 37
Hogansburg, NY 13655

Dear Joyce:

Below are the ozone data we have for the Cornwall, Canada site and the other two sites you requested (Essex County and Jefferson County).

8-Hour (average of 4th maximum over 3 years) over 85 ppb is a violation.

Data from Cornwall (Bedford & 3rd St.)

Year	Max (ppb)
1998	88
1997	85
1996	80
1995	86
1994	76

If you average the maximums for 1996-1998 (88+85+80)/3 = 84, the numbers show no violations.

	'96	'97	'98	'99	96-98 avg	97-99 avg
Essex County (monitor J)						
Summit, whiteface mtn	82	82	79	83	81	81
Base, whiteface mtn	68	77	77	82	74	78
Jefferson County (monitor M)	74	94	88	89	85	90

If you have any questions, please feel free to call me at (212) 637-3715, otherwise I will contact you the week of September 3, 2000.

Sincerely yours,

Mazeeda Khan

Mazeeda Khan

Attachment 2. Ozone Monitoring Sites.

Reference: http://www.epa.gov/airnow/maps/static/upny.gif

Ozone Monitoring Sites

Attachment 3. Tribes Affected by MSAs/CMSAs.

ATTAINMENT DESIGNATIONS
8-HOUR NATIONAL AMBIENT AIR QUALITY STANDARD (NAAQS) FOR OZONE
REGION 2 COMMUNICATION IMPLEMENTATION STRATEGY

Background: EPA is asking that by September 30, 2000, each Indian Nation provide recommendations for designation of its lands as attaining or not attaining the 8-hour ozone standard. (The States are already actively participating in this process.) Once the letters are sent to the Tribal Chiefs, the Air Programs Branch will contact each Nation's environmental staff and offer technical assistance in making an attainment recommendation. Depending on each Nation's preference, assistance will be provided via e-mail, fax, conference calls, site visits, and briefings.

Should one or more Indian Nations request Haudenosaunee Environmental Task Force's (HETF) participation on attainment designations, we will initiate contact.

St. Regis Mohawk Tribe
Reservation location: Franklin County
Ozone violations: No violations
Form of communication: Conference calls, faxing and emailing. No site visit necessary.

Oneida Nation
Reservation location: Madison County (Syracuse CMSA)
Ozone violations: No violations
Form of communication: Conference calls, faxing and emailing. Site visit unlikely.

Seneca Nation of Indians
Reservation location:

Cattaraguas -	Erie County (Buffalo-Niagara CMSA), Chautauqua County (Jamestown MSA), Cattaraguas County
Allegany -	Cattaraguas County
Oil Springs -	Cattaraguas County, Allegany County

Ozone violations: Erie and Chautauqua have violations, Cattaraguas and Allegany have no violations
Form of communication: Conference calls, faxing and emailing. Additionally, Seneca's environment staff will be in Region on September 25, 2000. This will provide on opportunity to meet on outstanding issues. No site visit necessary.

Tuscarora Nation
Reservation location: Niagara County (Buffalo-Niagara CMSA)
Ozone violations: Niagara County has violations.
Form of communication: Conference calls, faxing and emailing. May work through HETF. Knowledge of ozone limited. Site visit may be necessary.

Tonawanda Band of Senecas
Reservation location: Niagara County (Buffalo-Niagara CMSA)
Erie County (Buffalo-Niagara CMSA),
Genessee County (Rochester CMSA)
Ozone violations: All counties have violations
Form of communication: Conference calls, faxing and emailing. May work through HETF. Knowledge of ozone limited. Site visit may be necessary.

Onondaga Nation
Reservation location: Onondaga County (Syracuse MSA)
Ozone violations: No violations
Form of communication: Conference calls, faxing and emailing. Knowledge of ozone limited. No site visit necessary.

Haudenosaunee Environmental Task Force (HETF)
Form of communication: Conference calls, faxing and emailing. Possible site visit. We would only initiate communication with the HETF if involvement is requested by one or more Indian Nations.