



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 13, 2008

Elin D. Miller, Regional Administrator
U. S. Environmental Agency, Region 10
1200 Sixth Ave.
Seattle WA 98101

Dear Ms. Miller:

On behalf of the Governor, I am submitting a proposal regarding the state of Washington's proposed nonattainment area for a portion of Pierce County, WA. The Environmental Protection Agency (EPA) requested that the state propose a nonattainment area for any area recommended for designation as nonattainment. On December 18, 2007, the state of Washington submitted a recommendation to EPA that a portion of Pierce County be designated nonattainment because of monitored violations of the 24-hour PM_{2.5} standard. At the same time, we made a commitment to evaluate a proposed nonattainment area by February 15, 2008.

We have reviewed comments that we received from a public hearing held on December 5, 2007, met with stakeholders, and held discussions with the Puget Sound Clean Air Agency (PSCAA), the local air authority with jurisdiction over Pierce County, and your staff at EPA Region 10. We thank your staff for working with us; recognizing our need for more time to evaluate an appropriate nonattainment area. We appreciate your consideration.

We are submitting a map and a description of the proposed nonattainment area. We have decided to name the proposed area "Wapato Hills-Puyallup River Valley PM_{2.5} Nonattainment Area" in recognition of local geographic features. Our recommended designation does not apply to trust lands within the Puyallup Indian Reservation. Congress explicitly provided state and local agencies authority over activities on non-trust lands within the Puyallup Indian Reservation under the Puyallup Tribe of Indians Settlement Act of 1989, 25 U.S.C. 1773. EPA is responsible for air quality on trust lands.

We are also forwarding our review and revision of the proposed nonattainment area developed by PSCAA and PSCAA's evaluation of the nine factors specified by EPA for determining nonattainment area boundaries. We revised PSCAA's proposed area by

- Adjusting the northeast boundary to reflect topography
- Removing the City of Tacoma's Point Defiance Park from the nonattainment area
- Revising the western boundary at American Lake to the boundary between the City of Lakewood and North Fort Lewis



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Our revisions to the boundary do not fundamentally alter PSCAA's evaluation of the nine factors and Ecology is not updating the evaluation.

Finally, we are providing the Responsiveness Summary prepared for our December 5, 2007, hearing for your convenience. The hearing addressed both recommendations for PM_{2.5} designations and the proposed nonattainment area.

Thank you for your consideration of our proposed nonattainment area. Please contact Doug Schneider of my staff at 360-407-6874/ dsch461@ecy.wa.gov if you have questions.

Sincerely,



Jay J. Manning,
Director

Enclosures

cc: Doug Schneider, Ecology
Sarah Rees, Ecology
Stu Clark, Ecology
Dennis McLerran, PSCAA
Keith Phillips, OFM
Mahbubul Islam, EPA
Gina Bonifacino, EPA

Boundary Description Proposed Wapato Hills-Puyallup River Valley PM_{2.5} Nonattainment Area

Washington State Department of Ecology
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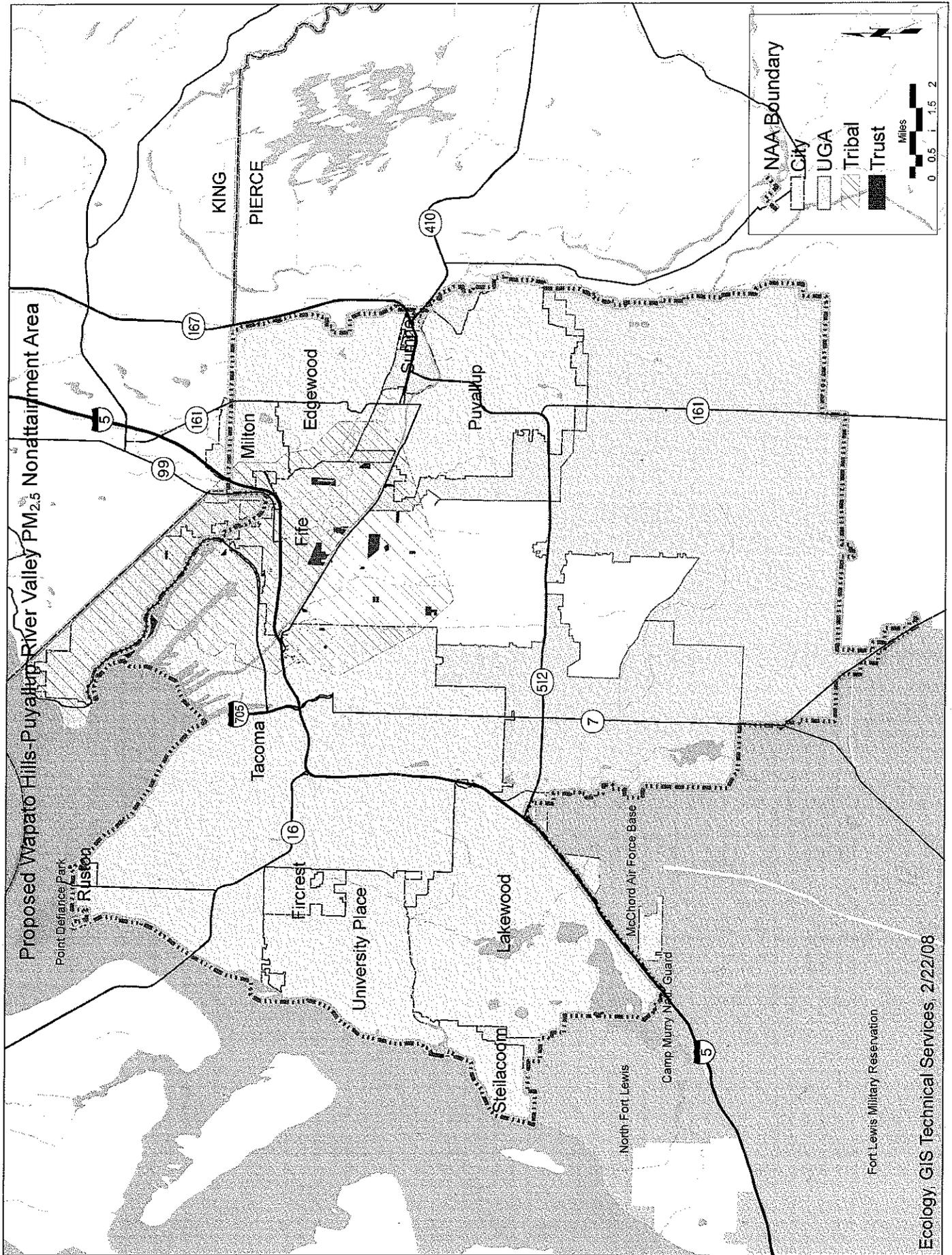
The state of Washington is submitting this proposed nonattainment area to the United States Environmental Protection Agency (EPA) to accompany its December 18, 2007 recommendation that a portion of Pierce County be designated nonattainment due to violation of the 24-hour PM_{2.5} standard. The state is requesting that this area be referred to as "Wapato Hills-Puyallup River Valley PM_{2.5} Nonattainment Area" after geographic features within the proposed area. A map of the proposed nonattainment area is attached and a description of the boundary is provided below.

The proposed nonattainment area does not include trust lands within the Puyallup Indian Reservation. Congress explicitly provided state and local agencies authority over activities on non-trust lands within the Puyallup Indian Reservation under the Puyallup Tribe of Indians Settlement Act of 1989, 25 U.S.C. 1773. EPA is responsible for air quality on trust lands.

The boundary of the proposed nonattainment area is as follows:

- Starting from where an extension of Kennedy Road Northeast would intersect Commencement Bay, proceed north to the intersection of Marine View Drive (State Route 509) and Kennedy Road Northeast.
- Proceed south on Marine View Drive to Hylebos Creek.
- Proceed south along Hylebos Creek to 12th Street East.
- Proceed east on 12th Street East to 70th Avenue East.
- Proceed south on 70th Avenue East to State Route 99 (S.R. 99).
- Proceed north on S.R. 99 0.1 mile north of Birch Street to a driveway to the east.
- Proceed east along the driveway and continue east along the same alignment to the Pierce County Line/Comprehensive Urban Growth Area (CUGA) boundary.
- Proceed east along the Pierce County Line/CUGA boundary to the eastern boundary of Edgewood.
- Proceed south along the eastern boundary of Edgewood to eastern boundary of the Sumner Urban Service Area.
- Proceed south along eastern boundary of the Sumner Urban Service Area to the eastern boundary of the Puyallup Urban Service Area.
- Proceed south along the eastern boundary of the Puyallup Urban Service Area to the eastern boundary of Puyallup/CUGA boundary.
- Proceed south and then west along the CUGA boundary to the eastern boundary of McChord Air Force Base.

- Proceed north along the eastern boundary of McChord Air Force Base to the northernmost point on the eastern boundary.
- Proceed from the northernmost point on the eastern boundary of McChord Air Force Base to the south right-of-way of S.R. 512.
- Proceed west along the south right-of-way of S.R. 512 to the south right-of-way of I-5.
- Proceed south along the south right-of-way to I-5 to the point opposite the boundary between Lakewood and Camp Murray.
- Proceed north across I-5 to the boundary between Lakewood and Camp Murray.
- Proceed north along the western boundary of Lakewood to the point where the western boundary coincides with the CUGA boundary.
- Proceed north along the CUGA boundary to the southern boundary of Point Defiance Park.
- Proceed east along the southern boundary of Point Defiance Park to Commencement Bay/CUGA boundary.
- Proceed southeast, then northeast, and finally northwest along the CUGA boundary to the starting point.



Proposed Wapato Hills-Puyallup River Valley PM_{2.5} Nonattainment Area

Point Defiance Park
Ruston

KING
PIERCE

Milton
Edgewood

Tacoma

Fircrest

University Place

Lakewood

Puyallup

North Fort Lewis

Camp Murray Nat. Guard

McChord Air Force Base

Fort Lewis Military Reservation

Legend

- NAA Boundary
- City
- UGA
- Tribal
- Trust

Miles
0 0.5 1 1.5 2