



Janet Napolitano  
Governor

March 26, 2004

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 W. Washington Street • Phoenix, Arizona 85007  
(602) 771-2300 • [www.adeq.state.az.us](http://www.adeq.state.az.us)



Stephen A. Owens  
Director

Wayne Nastri, Regional Administrator  
U.S. Environmental Protection Agency, Region IX  
ORA-1  
75 Hawthorne Street  
San Francisco, CA 94105-3901

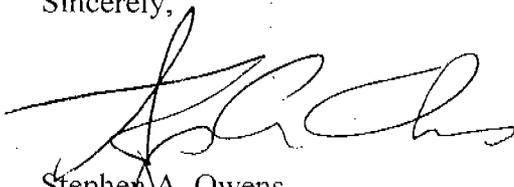
Re: Exclusion of Mohave County from the Las Vegas 8-Hour Ozone Nonattainment Area

Dear Mr. Nastri:

On July 11, 2003, Governor Napolitano signed an 8-hour ozone area designation recommendation for all areas of Arizona outside of Indian Country. That recommendation was transmitted to you on July 15, 2003, and requested that Mohave County be classified as attainment /unclassifiable. Recent communications from your staff have indicated that the Las Vegas Consolidated Metropolitan Statistical Area (C/MSA), which includes Mohave County, will be classified as nonattainment. This letter transmits Arizona's justification for excluding Mohave County. The analysis was prepared consistent with the guidance contained in the memorandum of March 28, 2000, from John Seitz regarding Boundary Guidance on Air Quality Designations for the 8-Hour Ozone National Ambient Air Quality Standards. Arizona's justification addresses each of the eleven factors that states are directed to consider in recommending nonattainment area boundaries that are smaller than the C/MSA.

Arizona appreciates your consideration of this analysis. If you have questions or need more information, your staff should contact Nancy Wrona, Director of the Air Quality Division, or Ira Domsky, Deputy Division Director, at (602) 771-2308.

Sincerely,



Stephen A. Owens  
Director

Enclosure

cc: Colleen Cripps, Nevada Department of Environmental Protection  
Colleen McKaughan, Associate Director

Northern Regional Office  
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004  
(928) 779-0313

Southern Regional Office  
400 West Congress Street • Suite 433 • Tucson, AZ 85701  
(520) 628-6733