



PALA ENVIRONMENTAL PROTECTION AGENCY

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Wayne Nastri
U.S. EPA Regional Administrator
74 Hawthorne Street
San Francisco, CA 94105

Subject: Proposed Unclassifiable PM_{2.5} Designation for the Pala Band of Mission Indians Reservation.

Thank you for the opportunity to submit a designation recommendation for the area under the Pala Band of Mission Indians jurisdiction for the PM_{2.5} National Ambient Air Quality Standard. The goals of the Pala Band of Mission Indians are to maintain good air quality, strive to protect the air resources for future generations, and exercise our inherent sovereign authority over our air shed as provided in sections 301(d) and 110(o) of the Clean Air Act. Pala recommends that the lands within the exterior boundaries of the reservation be designated as an Unclassifiable area for the PM_{2.5} National Ambient Air Quality Standard. Below are the reasons for the basis of our request:

1. Jurisdictional Boundaries

- The Pala band of Mission Indians Reservation currently occupies approximately 12,449 acres and is located approximately 10 miles southeast of Temecula and 60 miles northeast of San Diego within the San Diego Air Basin. The San Diego Air Basin is comprised of a single air district, the San Diego County APCD, which consists of all San Diego County. The current community reservation population is approximately 1,573 members.

2. Geographic Area

- The terrain within the Reservation boundary varies from relatively flat land with elevations of approximately 200 feet above mean sea level to very steep terrain with elevations greater than 3,000 feet above mean sea level. The spectrum of elevations within the Reservation is due in part to the mountain range of the

Cleveland National Forrest, which is located within the northeastern portion of the Reservation.

3. Population Density and Degree of Urbanization

- While San Diego County is one of the most populated counties in California, the northern part of the county and the Pala Reservation specifically is sparsely populated. The Census Bureau defines an “urban area” as an area containing at least 1,000 persons per square mile. The Reservation consists of 12,449 acres, or 19.45 square miles. With a population of 1,573, the reservation population density is 81 persons per square mile. Compare this with the City of San Diego at a population of 1.25 million and a density of 3,877 persons per square mile, and it becomes readily apparent that the two entities are vastly different. The Reservation is 60 miles to the north of the City of San Diego. To combine these two entities into the same geographic area for the purpose of air quality classification simply because they are within the same county is not reasonable.

4. Traffic and Commuting Patterns

- US Highway 15 is a major commuter corridor between San Diego County in the south and Riverside County to the north. Traffic volumes are heavy and contribute to the overall deterioration of air quality. US-15 is located seven miles west of the Pala Reservation. Prevailing winds blow from the Southwest toward the reservation. The Pauma Valley is narrow and affords a limited area of exposure to commuter traffic pollution. California State Highway 76 crosses the Reservation from east to west. Cal-trans traffic volume counts show a peak hourly volume of 1,200 vehicles. Vehicles using SH-76 are a mix of local residents, visitors to the casinos and limited commuter traffic.

5. Growth Rates and Patterns

- Overall the growth rate in San Diego County is declining, both numerically and percentage-wise. The slowed growth rate county-wide is in response to out migration by those seeking more affordable housing. Of the 12,449 within the Reservation only 2,639 acres are fee land which have strict regulations governing their disposition. Land development and concurrent population growth on the Pala Reservation is strictly regulated by the U.S. Department of Interior, Bureau of Indian Affairs in concert with the Pala Band of Mission Indians, and not subject to the same developmental pressures as privately held lands elsewhere. With a total tribal population of 924 there is little demand for development at the present time. With significant growth restraints, air quality deterioration on the reservation should remain unchanged in the foreseeable future.

6. Meteorological Data

- The Pala reservation is east of the coastal range and has a fairly mild climate that does not experience great temperature variations between winter and summer. The area experiences temperatures that are comfortably mild in the winter and persistently warm throughout the summer. The prevailing wind direction blows from the South-Southwest toward the Northeast region of the reservation at an

average of 4 ½ miles per hour. Pala is currently gathering data from three strategically placed meteorological stations to help better understand the wind patterns within the reservation valley.

7. Emissions Data

- An Emissions Inventory (EI) of the various pollution sources within the reservations exterior boundaries was performed in 2006. It was found in this inventory that majority of our PM_{2.5} emissions are produced from traffic on SH-76 and US-15. There are no significant PM_{2.5} emitting facilities present on the reservation. Although Pala has completed two EI's prior to 2006 (2000 and 2003), estimates for PM_{2.5} were not included in those mentioned inventories.

8. Air Quality Data

- The Pala EPA (PEPA) is currently conducting PM_{2.5} monitoring with a Met-One Inc, Beta Attenuation Monitor (BAM-1020). The PEPA has been sampling with this PM_{2.5} monitor since August of 2005 and has yet to collect the three years of data required to make an attainment designation. Until the additional monitoring data can be collected for PM_{2.5}, Pala is recommending a designation of unclassifiable. However, the PM_{2.5} data collected so far, to date, indicates that the reservation will meet the NAAQS for PM_{2.5}.

If you have any questions regarding this recommendation please contact:

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In conclusion we respectfully request that the Pala Reservation remain unclassified for PM_{2.5} designation purposes. Thank you for your attention to this matter.

Regards,



Robert H. Smith
Tribal Chairman