



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

OCT 02 2014

Mr. Steven Estrada, Environmental Manager
Soboba Band of Luiseño Indians
P.O. Box 487
San Jacinto, California 92581

Dear Mr. Estrada:

This letter responds to the Soboba Band of Luiseño Indians' (Soboba Band) September 23, 2014 request for consultation regarding EPA's recent designations for the 2012 PM_{2.5} national ambient air quality standard (2012 PM_{2.5} standard). On September 30, 2014, EPA participated in a conference call with you regarding the 2012 PM_{2.5} standard designations to discuss the Soboba Band's questions and concerns. During our September 30, 2014 discussion, we described the Clean Air Act's designations process for the 2012 PM_{2.5} standard, reviewed the history of the PM_{2.5} standard in the southern California area, and explained the implications of the nonattainment designation for the Soboba Band.

Multiple Factors Considered:

As noted in our call, EPA included the Soboba Band's Indian country in the South Coast Air Basin, which EPA intends to designate nonattainment for the 2012 PM_{2.5} standard, after considering multiple factors: 1) air quality, 2) emissions and emissions-related data, 3) meteorology (weather/transport patterns), 4) geography/topography (mountain ranges or other air basin boundaries) and 5) jurisdictional boundaries. With respect to these five factors, it is important to note that nonattainment areas are intended to include areas that are violating the standard, as well as areas that may cause or contribute to the violation. The two air monitors that measure PM_{2.5} concentrations for regulatory use closest to Soboba Band's Indian country are a monitor in the city of Palm Springs and a monitor in the city of Riverside. The San Jacinto Mountains fall between the Soboba Band's Indian country and Palm Springs, while there is no similar topographical feature separating the Soboba Band's Indian country from Riverside. The Riverside monitor and those near it measure some of the highest concentrations of PM_{2.5} in the nation. While emissions occurring in Soboba Band's lands may be small, the dominant meteorological patterns combined with the area's topography contribute to transport of PM_{2.5} emissions from the west to the east in the South Coast Air Basin (these patterns can be verified by looking at monitored concentrations within the area). Finally, EPA weighed each of these factors in the context of existing jurisdictional boundaries and determined that the Soboba Band's Indian country should be designated nonattainment as part of the South Coast Air Basin for the 2012 PM_{2.5} standard as it has for each of the prior particulate matter standards.

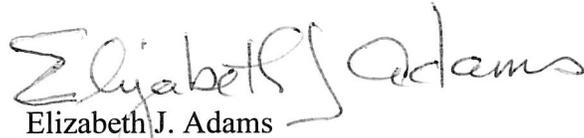
Implications of the Soboba Band's designation:

With the 2012 PM_{2.5} standard designation, the Soboba Band will not be responsible for any new planning activities. The required planning activities are performed by the South Coast Air Quality Management District or the Southern California Association of Governments. In addition, given the South Coast Air Basin's current classification under the PM_{2.5} standard, permitting thresholds (presently

set at 100 tons per year for new sources) on the Soboba Band's lands will not change, unless the area fails to attain the PM_{2.5} standard within the prescribed timeframe.

Thank you for the opportunity to better understand the Soboba Band's concerns. I hope this letter helps to clarify our designations process. In the event that the Soboba Band has additional questions or concerns, please contact me at (415) 972-3183 or Ken Israels of our Grants and Program Integration Office at (415) 947-4102.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth J. Adams". The signature is written in a cursive style with a large initial "E" and a long, sweeping underline.

Elizabeth J. Adams
Deputy Director, Air Division