



PECHANGA INDIAN RESERVATION

Temecula Band of Luiseño Mission Indians

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December 17, 2007

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

Subject: PM_{2.5} Designation Recommendation for the Pechanga Band of Luiseño Indians

Dear Mr. Nastri,

The Pechanga Band of Luiseño Indians appreciates the opportunity to submit a recommendation for the designation of the National Ambient Air Quality Standard for PM_{2.5}. In accordance with the appropriate provisions of sections 301(d) and 110(o) of the Clean Air Act, the Pechanga Band of Luiseño Indians recommends that the air quality management area within the Pechanga Reservations' exterior boundaries be designated as *unclassifiable* for the annual and 24-hour standards for PM_{2.5}. Several factors, outlined below, provide the basis of our request.

Geography

The Pechanga Reservation is located on a total land base of approximately 5,600 acres. The Reservation is in Southern Riverside County with its southern border at the San Diego County line. The City of Temecula is located to the northwest, the town of Rainbow to the southwest, and the Cleveland National Forest to the southeast. The Reservation is comprised of mountains and plateaus, with elevations ranging from 1,100 feet to 2,600 feet in the southeastern portion. Agua Tibia Mountain and Wild Horse Peak are located to the southeast and east, and Mount Olympus and Gavilan Mountain are located to the southwest and west.

Population Density and Degree of Urbanization

Approximately 800 full-time residents live on the Main Reservation. The Main Reservation hosts 191 homes and 12 government buildings. Most of the Reservation's current land use is rural residential. The Kelsey Tract hosts the hotel and casino, associated parking structures, a 160 acre golf course, a gas station, and a 200 space RV Park.

Growth Rates and Patterns

Though it borders the City of Temecula, the Pechanga Indian Reservation is relatively remote and sparsely populated. With a total reservation population of 800, there is little demand for



development at the present time. Without development projects, air quality should remain unchanged in the foreseeable future.

Meteorology

The Lake Elsinore area, north of Temecula is a convergence zone of winds from the coastal regions northwest of Lake Elsinore and from the southwest through the Temecula Valley by way of the Rainbow Gap. Winds that enter the Temecula Valley, via the Rainbow Gap, originate offshore and travel over the Camp Pendleton area, which has relatively low air emissions, which then passes over the Pechanga Reservation. In addition, northeasterly winds that flow across the coastal regions of the South Coast Air Basin help prevent pollutants from being carried into the Temecula Valley from the Los Angeles and Orange County areas.

Jurisdictional Boundaries

The Pechanga Indian Reservation is located within the South Coast Air Quality Management District (SCAQMD), which has been designated by the U.S. EPA as non-attainment for PM_{2.5}. The SCAQMD encompasses all of Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. It is understood that the Pechanga Indian Reservation is not within the enforcement jurisdiction of the SCAQMD, but it is identified as having the same air quality as that of neighboring communities under the jurisdiction of SCAQMD. The principal reason for this inclusion is based on Combined Metropolitan Statistical Areas (C/MSA), which includes San Bernardino, Riverside and Ventura Counties. There is a general consensus that the southwestern portion of Riverside County, in the vicinity of the Pechanga Reservation, has significantly better air quality than surrounding communities; including communities to the south of the Reservation. Assuming that the Pechanga Reservation's air quality is the same as larger metropolitan areas without valid data is not rational.

Traffic and Commuting Patterns

Two major roadways are within three miles of the Pechanga Indian Reservation; State Highway 79 (SH-79) and Interstate Highway 15 (I-15). SH-79 is located approximately 2.0 miles north of the Pechanga Indian Reservation. Traffic volumes on this highway are moderate but volumes are growing as development increases in the City of Temecula. It is believed that emissions from this highway have a relatively low impact on Pechanga's air quality due to the northeasterly wind patterns. I-15 is located approximately 3.0 miles west of the Pechanga Indian Reservation. Traffic volumes are heavy as this is a major commuter corridor between San Diego County and Riverside County. Actual emissions from either highway are unknown; sufficient air quality data is needed in order to determine impacts to Pechanga's airshed.

Emission Data

In 2005 the Pechanga Environmental Department conducted an emissions inventory for the areas within the exterior boundaries of the Pechanga Indian Reservation. The assessment focused on providing a baseline estimate of existing air pollution sources, collecting and evaluating current and historical meteorological and air quality information, identifying gaps in available information, and assessing whether additional monitoring is necessary. Overall estimates of emissions were derived from the Tribal Emissions Inventory Software Solution computer program based on US EPA's document "AP-42: Compilation of Air Pollution Emission Factors." Although the air quality assessment was prepared using currently available information,



results indicate that in order to accurately characterize the air quality of the areas within the Pechanga Indian Reservation jurisdiction, site-specific air quality monitoring is required. These results clearly indicate that air quality within the exterior boundaries of Pechanga Reservation is inconclusive.

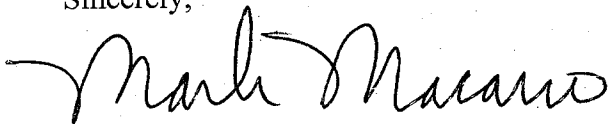
Air Quality Data

There is insufficient information to determine if the airshed within the exterior boundaries of the Reservation are in non-attainment for PM_{2.5}. The general reference for this recommendation is the Transportation Equity Act of the 21st Century (Section 6102(c)(1) of TEA-21), which states that designations are based on sufficient monitored data obtained through the use of federal reference or equivalent monitoring methods. The nearest PM_{2.5} monitor in Riverside County is in the City of Riverside, 42 miles north; the nearest PM_{2.5} monitor in San Diego County is in the City of Escondido, located about 35 miles south. It is believed that PM_{2.5} data from either station do not represent the Pechanga airshed because of the unique topography and complex meteorological conditions. Pechanga has recently purchased federal reference method ambient air monitoring equipment, which includes a Met-One Beta Attenuation Monitor (BAM 1020) for PM_{2.5}, and will begin monitoring in February of 2008.

In conclusion, while the Pechanga Indian Reservation exists within the boundaries of Riverside County, topographic conditions, population density, monitoring station locations and climatological conditions make it clear that there is a gap in the data network in the vicinity of the Reservation that makes characterization of local air quality incomplete. The Pechanga Band of Luiseño Indians respectfully recommends that the Pechanga Indian Reservation and the areas within its exterior boundaries be designated as *unclassifiable* for the PM_{2.5} National Ambient Air Quality Standard. Thank you for your immediate attention on this matter.

If you have any questions regarding this recommendation or requests for additional information, please contact Ms. Syndi Smallwood (Environmental Department Director) at 951-676-2768.

Sincerely,



Mark Macarro, Tribal Chairman

Cc: Lisa Hanf, Manager, USEPA Air Planning Office
Darrel Harmon, Tribal Program Manager, USEPA Office of Air and Radiation
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