



**PALA BAND OF  
MISSION INDIANS**

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Jared Blumenfeld  
U.S. EPA Regional Administrator  
74 Hawthorne Street  
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**SUBJECT: PROPOSED ATTAINMENT/UNCLASSIFIABLE PM<sub>2.5</sub> 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 2012 Annual PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS). 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 remain designated as an attainment/unclassifiable area for the 2012 Annual PM<sub>2.5</sub> NAAQS. Below are the reasons for the basis of our request:

**JURISDICTIONAL BOUNDARIES**

The Pala Indian Reservation is located in the central northern part of the San Diego County Air Basin (SDCAB) and is within the jurisdiction of the San Diego County Air Pollution Control District (SDCAPCD). The SDCAB and SDCAPCD cover San Diego County only. Two other air basins adjoin the San Diego County Air Basin. These are the South Coast Air Basin to the northwest and the Salton Sea Air Basin to the east and northeast. Emissions from these two adjoining air basins could impact the air quality in the SDCAB, particularly the Reservation area. Winds associated with seasonal weather fronts could bring emissions from neighboring air basins into the SDCAB. However, the air quality in the rural parts of the SDCAB, including the reservation, is generally quite good due to several factors including low population and a lack of major industries or stationary sources.

**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 Forest, which is located within the northeastern portion of the Reservation.

## **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 1,618, the reservation population density is 83 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.

## **TRAFFIC AND COMMUTING PATTERNS**

US Interstate 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. Caltrans 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.

## **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 acres within the Reservation only 2,639 are fee lands 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.

## **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.

## **EMISSIONS DATA**

An Emissions Inventory (EI) of the various pollution sources within the reservation's exterior boundaries was updated in 2010. It was found in this inventory that the majority of our PM<sub>2.5</sub> emissions are produced from traffic on SH-76 and US-15. Not only are there no significant PM<sub>2.5</sub> emitting facilities present on the reservation, but our design value shows we fall under the new standard of 12 µg/m<sup>3</sup>. See air quality data section below.

**AIR QUALITY DATA**

Pala is currently conducting PM<sub>2.5</sub> monitoring with a Met-One BAM-1020 which is located within our jurisdictional boundaries just one mile east of the Pala Casino. The closest PM<sub>2.5</sub> monitor to our station is located approximately 25 miles south in Escondido off of E. Valley Parkway. We have been sampling with this monitor since 2005 and have collected the three years of data required to make an attainment designation. The data used in this designation letter was collected in accordance with the requirements of 40 CFR part 58. The last three years of data clearly demonstrates Pala meeting the newly revised PM<sub>2.5</sub> annual standard of 12 µg/m<sup>3</sup> (see data below).

<b>YEAR</b>	<b>ANNUAL AVERAGE</b>
<b>2010</b>	<b>8.8</b>
<b>2011</b>	<b>9.9</b>
<b>2012</b>	<b>9.8</b>
<b>DESIGN VALUE</b>	<b>9.5</b>

Because our design value is 9.5 µg/m<sup>3</sup>, well below the standard, we respectfully request that the Pala Indian Reservation remain designated as unclassifiable/attainment for the 2012 annual PM<sub>2.5</sub> NAAQS. Thank you for your attention to this matter.

If you have any questions regarding this recommendation please contact:

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Regards,



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Tribal Chairman