



PECHANGA INDIAN RESERVATION

Temecula Band of Luiseño Mission Indians

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December 17, 2013

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

Subject: 2012 Annual Fine Particle (PM2.5) Standard Designation Recommendation for the Pechanga Band of Luiseño Indians

Dear Mr. Blumenfeld,

The Pechanga Band of Luiseño Indians ("Tribe") appreciates the opportunity to submit a recommendation for the designation of the 2012 Annual Fine Particle (PM2.5) National Ambient Air Quality Standard. In accordance with the appropriate provisions of the Clean Air Act, the Tribe recommends that the air quality management area within the Pechanga Reservation's exterior boundaries be designated as unclassifiable for the 2012 PM2.5 Standard. Pertinent factors outlined below provide the basis of our request.

Geography/Topography

The Pechanga Reservation proper is located on a total land base of 6,724 acres, which consists of four tracts referred to as the: Main Reservation, Kelsey Tract, Zone 5, and Great Oak. Land uses on the Reservation include 200 acres of commercial/recreational development, 300 acres of rural residential/industry, with approximately 1,200 acres of allotted land. Most of the current land use on the Main Reservation is rural residential, with homes generally located near the Pechanga Creek channel. Elevations range from 1,100 feet to 2,600 feet in the southeastern portion. The Reservation is settled amidst mountain ranges, with Wild Horse Peak and Agua Tibia Mountain to the east/southeast; Pala Mountain to the South; Mount Olympus and Gavilan Mountain to West/Southwest, respectively; and the Santa Rosa mountain ranges, running north and south. The Santa Margarita Ecological Reserve (SMER), managed by San Diego State University, is located about 4 miles west-northwest. Interstate 15, a major transportation route for the inland counties, is located approximately 0.2 miles west of the Reservation; the City of Temecula is located to the northwest, the town of Rainbow to the southwest, and the Cleveland National Forest to the southeast.

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, and 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.

(Continued)

Jurisdictional Boundaries

The Pechanga Reservation is located in Riverside and San Diego Counties. Riverside County is within the South Coast Air Quality Management District (SCAQMD), which has been designated by the U.S. EPA as non-attainment for PM2.5. 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 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, and North San Diego County in the vicinity of the Pechanga Reservation, has significantly better air quality than surrounding communities; including communities to the south of the Reservation.

Emission Data

Emissions information for 2012 is currently being finalized for the areas within the exterior boundaries of the Pechanga Reservation. The assessment focused on providing an updated summary of emissions sources relevant to the Reservation. The main Reservation hosts approximately 180 homes and 12 government buildings with an estimated 540 full-time residents. Commercial activities include a 14-story hotel, casino and convention center, associated parking structures, a gas station/convenience store, a 160 acre 18-hole Golf Course, a 200 space RV Park and car wash.

Two major roadways are within three miles of the Pechanga 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. It is believed that emissions from this highway have a relatively low impact on Pechanga's air quality due to the northeasterly wind patterns.

Air Quality Data

Information is currently being gathered to determine if the airshed within the exterior boundaries of the Reservation is in attainment for PM2.5. The nearest PM2.5 monitor in Riverside County is in the City of Riverside, approximately 40 miles northwest of the Reservation; the nearest PM2.5 monitor in San Diego County is in the City of Escondido, located approximately 25 miles south of the Reservation. It is believed that PM2.5 data from either station does not accurately represent the Pechanga airshed because of the unique topography and complex meteorological conditions within the Pechanga airshed. Pechanga has been monitoring for PM2.5 since 2008 utilizing a MetOne Beta Attenuation Monitor (BAM 1020), a federal equivalent method, and in 2010 began collecting collocated data using an R&P Partisol 2000 Monitor, a federal reference method. While a full three years worth of NAAQS comparable data is in the process of being gathered, current data indicates that the Reservation will be in attainment for the 2012 PM2.5 standard.

In conclusion, while the Pechanga Reservation exists within the boundaries of Riverside County and in San Diego County, topographic conditions, population density, monitoring station locations and meteorological conditions make it clear that there is a gap in the data network in the vicinity of the Reservation. Until the full three years worth of PM2.5 data is gathered at Pechanga's Ambient Air Quality Monitoring Station, characterization of the local air quality is incomplete. The Pechanga Band of Luiseño Indians respectfully recommends that the Pechanga Reservation and the areas within its exterior boundaries be designated as unclassifiable for the 2012 Annual PM2.5 Standard.

If you have any questions regarding this recommendation or require additional information, please contact Ms. Syndi Smallwood, Environmental Director, at 951-770-6150.

Sincerely,



Mark Macarro
Tribal Chairman