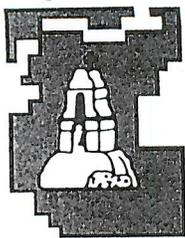


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PALA BAND OF MISSION INDIANS

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DATE 2/29/2012	
ACTION (✓)	COPIED (✓)
RA	RA
DRA	DRA
✓ AIR	AIR
CED	✓ CED
MTS	MTS
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SCFO	SCFO
WASTE	WASTE
WATER	WATER
	✓ L.A.S.A.

February 22, 2012

Jared Blumenfeld
U.S. EPA Regional Administrator
74 Hawthorne Street
San Francisco, CA 94105

Subject: Proposed Unclassifiable/Attainment Ozone Designation for the Pala Band of Mission Indians Reservation.

Dear Mr. Blumenfeld,

Thank you for the opportunity to submit a designation recommendation for the area under the Pala Band of Mission Indians jurisdiction for the revised 2008 ozone 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 be designated as an unclassifiable/attainment area for the revised 2008 ozone NAAQS. The basis for our request is listed below:

1. Jurisdictional Boundaries

The Pala Indian Reservation is located in north San Diego County approximately 10 miles southeast of Temecula and 60 miles northeast of San Diego. Established in the early 1900s, the reservation covers an area of approximately 12,449 acres held in trust for the tribe by the Bureau of Indian Affairs under the direction of the Department of the Interior. The total reservation population is approximately 1,315.

2. Geographic Area

The reservation lies within an alluvial valley surrounded by steep granitic mountains and is divided into two areas by the San Luis Rey River, which are referred to as the north side and the south side. Elevations range from around 340 feet above mean sea level (MSL) at the valley floor to around 1,250 feet MSL in the northern and southern mountainous areas with most residential, agricultural, and industrial activities occurring in the lower elevations of the

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reservation. Neighboring the reservation is the Cleveland National Forest to the north and east and private agricultural lands to the south and west.

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 1,315, the reservation population density is 68 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. 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.

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 acres 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 762 there is little demand for development at the present time. With significant growth restraints, air quality on the reservation should remain unchanged in the foreseeable future.

6. Meteorological Data

Temperatures in the Pala Valley are relatively moderate, ranging from an average of around 55 °F during the winter months to an average of around 72.3 °F during the summer. In 2011 the total annual rainfall for the Pala area was approximately 9.7 inches with the wettest month being

February. The prevailing wind direction blows from the south-southwest toward the northeast region of the reservation at an average of 3.3 miles per hour.

7. Emissions Data

Ground-level ozone is created by a chemical reaction between oxides of nitrogen (NOx) and volatile organic compounds (VOC) in the presence of sunlight. The Pala Environmental Department recently completed an Emissions Inventory for 2011 and found no significant NOx or VOC emitting facilities present on or near the reservation. The majority of our NOx and VOC emissions are produced by traffic off the SH-76. Not only are there no significant sources of NOx and VOC emissions on the reservation, but our 3-year ozone design value shows we fall under the new standard of 0.075 ppm (see section 8). Please see emissions totals chart below.

<i>Emissions Type</i>	<i>Area (Non-Point) Emissions (tons/year)</i>	<i>Fire Emissions (tons/year)</i>	<i>On-Road Mobile Emissions (tons/year)</i>	<i>Non-Road Mobile Emissions (tons/year)</i>	<i>2011 Total Estimated Emissions (tons/year)</i>	<i>2006 Total Estimated Emissions (tons/year)</i>
VOC	1.2527	15.6693	-	1.1791	18.10	43.34
NO _x	1.0801	7.1434	7.3694	0.0224	15.62	5.02

8. Air Quality Data

Pala is currently conducting ozone monitoring with a Teledyne-API 400e Ozone Analyzer. We have been sampling with this ozone monitor since 2003 and have collected the three years of data required to make an attainment designation. The last three years of data clearly demonstrates Pala meeting the newly revised ozone standard of 0.075 ppm (see chart below). Not accepting attainment “doughnut holes” even if the data shows we meet the standard ignores the science behind the data that EPA is paying to have collected.

<i>Year</i>	<i>Valid Days</i>	<i>Percent Complete</i>	<i>4th Max</i>
2009	331	91 %	0.069 ppm
2010	343	94 %	0.078 ppm
2011	330	90 %	0.070 ppm
<i>Design Value</i>			<i>0.072 ppm</i>

If you have any questions regarding this recommendation please contact:

Shasta Gaughen Pala EPA Director 760-891-3515
 Rodney Watkins Air Quality Specialist 760-891-3511
 Frank Spurgeon Air Technician 760-891-3540

In conclusion we respectfully request that the Pala Indian Reservation be designated as unclassifiable/attainment for the revised 2008 ozone NAAQS. Thank you for your attention to this matter.

Regards,

A handwritten signature in black ink, appearing to read 'R. Smith', written in a cursive style.

Robert H. Smith
Tribal Chairman