



## PECHANGA INDIAN RESERVATION

*Temecula Band of Luiseño Mission Indians*

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May 31, 2011

Mr. Jared Blumenfeld  
Office of the Regional Administrator  
Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Re: Initial Attainment Status Recommendation for the Recently Revised Primary National Ambient Air Quality Standards for Sulfur Dioxide

Dear Mr. Blumenfeld:

The Pechanga Band of Luiseno Indians (Tribe) is pleased to provide the following comments regarding your March 29, 2011 letter related to the initial attainment status designations for the recently revised primary National Ambient Air Quality Standard (NAAQS) for Sulfur Dioxide (SO<sub>2</sub>). The Tribe appreciates the opportunity to provide information to assist the Environmental Protection Agency in this effort.

### Background

The Pechanga Reservation covers approximately 6,700 acres in Southern Riverside County, CA and 119 acres in San Diego County, CA. Approximately 800 full-time residents live on the reservation. The reservation hosts 191 homes and 12 government buildings. Most of the reservation's current land use is rural residential. The Kelsey Tract section of the reservation hosts a hotel and casino, associated parking structures, a 160-acre golf course, a gas station, and an RV park.

### Attainment Status Recommendation

The Tribe does not conduct ambient monitoring for SO<sub>2</sub> on the reservation. Therefore, in order to determine the appropriate attainment status for the reservation ambient air quality data from nearby monitoring stations was reviewed. This data from the nearby monitors is summarized and compared to the recently revised SO<sub>2</sub> NAAQS in Table 1 below.

Tribal Chairman:  
Mark Macarro

Council Members:  
Mark Calac  
Corrine Garbani  
Andrew Masiel, Sr.  
Russell "Butch" Murphy  
Kenneth Perez  
Benjamin "Ben" Vasquez

Tribal Treasurer:  
Christina McMenamin

Tribal Secretary:  
Louise Burke

Table 1 One-Hour SO <sub>2</sub> Maximum Concentrations (ug/m <sup>3</sup> ) <sup>a</sup>					
Pollutant	Monitoring Site	2006	2007	2008	NAAQS <sup>b</sup>
SO <sup>2</sup>	Costa Mesa – Mesa Verde Drive	31	76	24	196
	Riverside – Rubidoux	31	42	29	196
	San Diego – 1110 Beardsley	89	47	50	196
Notes:					
a. US EPA AIRData website					
b. Federal 1-hour SO <sub>2</sub> standard is 75 ppb (196 ug/m <sup>3</sup> )					

As shown in Table 1 above, the maximum one-hour SO<sub>2</sub> concentration measured in the area surrounding the Reservation is well below the NAAQS. Based on this data, we believe that the Pechanga Indian Reservation should be classified as an attainment area for the primary SO<sub>2</sub> NAAQS.

If you have any questions regarding this matter or if you need additional data to support our recommendation, please contact Syndi Smallwood, Environmental Department Director, at (951) 770-6150.

Respectfully,

Mark Macarro  
Tribal Chairman

cc: Gary Rubenstein, Sierra Research