



PECHANGA INDIAN RESERVATION

Temecula Band of Luiseño Mission Indians

Post Office Box 1477 • Temecula, CA 92593
Telephone (951) 770-6000 Fax (951) 695-1778

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:
Darlene Miranda

January 25, 2011

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

Re: 1-Hour Nitrogen Dioxide (NO₂) Designation Recommendation for the Pechanga Band of Luiseño Indians

Dear Mr. Blumenfeld:

The Pechanga Band of Luiseño Indians appreciates the opportunity to submit a recommendation for the designation of the National Ambient Air Quality Standard for NO₂. 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 Reservation's exterior boundaries be designated as *unclassifiable/attainment* for the new 1-hour NO₂ standard. The unclassifiable/attainment request is based on Pechanga's estimation that the 1-Hour NO₂ levels from data gathered since 2008 are not out of compliance with the 1-Hour NO₂ standard; however, a full three years worth of data is necessary to make a final determination.

The Pechanga Ambient Air Monitoring Station is located at the Pechanga Government Center on the Pechanga Indian Reservation, near Temecula, California. Data gathered for NO₂ since the 3rd Quarter of 2008 through the 3rd quarter of 2010 have been validated, entered into the U.S. Environmental Protection Agency Air Quality System (AQS), and are summarized below within each year. The data currently indicates that the Pechanga Reservation will be in attainment for the new 1-Hour NO₂ standard as well as the Annual standard. The 4th Quarter 2010 data is in the process of validation, however, the summary of raw data has been provided for reference as preliminary results suggest that the station remains within compliance of the standards.

2008 NO₂ Summary:

In 2008 the Pechanga Ambient Air Monitoring Station came online. The 3rd and 4th Quarters are summarized below as these are the two Quarters that collected complete data after station installation:

3rd Quarter 2008: NO₂ data recovery for the quarter was 91%. The NO₂ average during the 3rd quarter was 4ppb. The highest 1-hour average for NO₂ during the quarter was 30ppb and it occurred on September 25, 2008.

4th Quarter 2008: NO₂ data recovery for the quarter was 94%. The NO₂ average during the 4th quarter was 7ppb. The highest 1-hour average for NO₂ during the quarter was 33ppb and it occurred on October 22, 2008.

2009 NO₂ Summary:

In 2009 the annual average was 5.2ppb and the 1-hour average was 27ppb. Each Quarter is summarized below:

1st Quarter 2009: The NO₂ data recovery for the quarter was 91%. The NO₂ average during the quarter was 8ppb, and the highest 1-hour average was 27ppb which occurred on January 20, 2009.

2nd Quarter 2009: The NO₂ data recovery for the quarter was 95%. The NO₂ average during the quarter was 4ppb, and the highest 1-hour average was 21ppb which occurred on April 21, 2009.

3rd Quarter 2009: The NO₂ data recovery for the quarter was 94%. The NO₂ average during the quarter was 3ppb, and the highest 1-hour average was 27ppb which occurred on September 23, 2009.

4th Quarter 2009: The NO₂ data recovery for the quarter was 95%. The NO₂ average during the quarter was 5ppb, and the highest 1-hour average was 26ppb which occurred on December 28, 2009.

2010 NO₂ Summary:

In 2010 the annual average is estimated at 3.7ppb and the 1-hour average is estimated at 23.5ppb. Each quarter is summarized below:

1st Quarter 2010: The NO₂ data recovery for the quarter was 92%. The NO₂ average during the 1st quarter was 4ppb. The highest 1-hour average was 25ppb, and it occurred on January 4, 2010.

2nd Quarter 2010: The NO₂ data recovery for the quarter was 92%. The NO₂ average during the 2nd quarter was 4ppb. The highest 1-hour average was 20ppb, and it occurred on April 8, 2010.

3rd Quarter 2010: The NO₂ data recovery for the quarter was 91%. The NO₂ average during the 3rd quarter was 3ppb. The highest 1-hour average was 24ppb, and it occurred on September 27, 2010.

4th Quarter 2010: The NO₂ data recovery is currently estimated at 90%. The NO₂ estimated average during the 4th quarter is 4.6ppb. The highest 1-hour average was 23ppb and it occurred on November 30, 2010.

In conclusion, while the Pechanga Ambient Air Monitoring Station is still in the process to gather 3 full years worth of data, all current data indicate the 1-Hour NO₂ standard will be met. The Pechanga Band of Luiseño Indians respectfully recommends that the Pechanga Indian Reservation and the areas within its exterior boundaries be designated as

unclassifiable/attainment for the 1-Hour NO₂ 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, Pechanga Environmental Department Director, ssmallwood@pechanga-nsn.gov or at 951-770-6150.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Macarro', with a stylized flourish at the end.

Mark Macarro,
Chairman

Cc: Deborah Jordan, R9 Air Division Director
Laura McKelvey, OAR