

## PECHANGA INDIAN RESERVATION

Temecula Band of Luiseño Mission Indians

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October 21, 2014

Mr. Jared Blumenfeld Regional Administrator U.S. Environmental Protection Agency, Region 9 75 Hawthorne Street San Francisco, CA 94105-3901

Re: Revised PM2.5 Designation Recommendation for the Pechanga Band of Luiseno Mission Indians

Dear Mr. Blumenfeld:

The Pechanga Band of Luiseño Mission Indians (Tribe) appreciates the opportunity to submit a revised recommendation for the designation of the National Ambient Air Quality Standard for PM2.5. 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 attainment/unclassifiable for the annual fine particle PM2.5 standards. This recommendation replaces the recommendation made by the Tribe in our letter to you dated December 17, 2013.

Under the standards enunciated in your letter of August 19, 2014, EPA intends to use a designation category of "unclassifiable/attainment" for areas that are monitoring attainment or do not have monitors, and that the EPA has reason to believe are likely attainment and are not contributing to nearby violations." By contrast, the EPA intends to classify as "unclassifiable" those areas where the EPA cannot determine based on available information whether the area is meeting the NAAQS or where EPA has not determined that the area contributes to a nearby violation. By these standards, the air quality management area within the Pechanga Reservation would more properly be designated as "unclassifiable/attainment" and on that basis we submit this revised recommendation.

As you know, the Tribe has been monitoring PM2.5 since 2008. We now have sufficient certified data to demonstrate a conclusive designation of attainment. The Tribe would appreciate an opportunity to consult with EPA on the designations process and we will be in touch with your office by phone to see if that is still feasible.

Thank you for your consideration of this revised recommendation.

Sincerely

Mark Macarro, Chairman