



**PALA BAND OF MISSION INDIANS**  
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October 6, 2009

Ms. Laura Yoshii, Acting Regional Administrator  
U.S. EPA  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Dear Ms. Yoshii:

Pursuant to your letter of September 9<sup>th</sup> concerning the area designation process for meeting the National Ambient Air Quality Standard (NAAQS) for lead, the Pala Band of Mission Indians is herein requesting that the Pala Indian Reservation be designated "unclassified." This request is in conformance with Section 107 (d) of the Clean Air Act. The basis for the recommendation of "unclassified" is as follows:

1. No data on lead is available from air monitoring samples taken on the Pala Reservation. The Air Pollution Control District of San Diego County did monitor for lead many years ago in areas near to the City of San Diego. Even then the amounts of lead detected were miniscule and demonstrated a pattern of diminishing from that level over time. The APC District has not sampled for lead for a very long time because of the lack of indicated need to do so.

2. The population of the Reservation is very small and scattered over a large area. Population density is light. We are located in the north end of San Diego County and approximately 30 miles from the metropolitan area of the City of San Diego. That coupled with the total lack of any recognized industrial source of lead pollution makes it very unlikely that there is any level of lead in excess of the new standard.

Thank you for your consideration of our recommendation. The "unclassified" status of the Reservation would be the appropriate designation. Your support of that designation would be greatly appreciated.

Sincerely,

Robert H. Smith  
Chairman

cc: Colleen McKaughan