

January 28, 2025

Cheree Peterson
Acting Regional Administrator
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

MORONGO
BAND OF
MISSION
INDIANS



Re: Recommendation for Separate Unclassifiable Designation for the Morongo Band of Mission Indians under the 2024 PM2.5 NAAQS

Dear Ms. Peterson,

On behalf of the Morongo Band of Mission Indians (Tribe), I am writing to formally recommend a separate designation for PM2.5 2024 National Ambient Air Quality Standards (NAAQS) designation. The Tribe recommends the boundaries for our Tribal lands be separate from the state areas, currently defined under the NAAQS. We recommend that the Environmental Protection Agency (EPA) designate the Morongo Tribal lands as *unclassifiable* under the 2024 NAAQS for PM2.5. This recommendation aligns with section 107(d)(1)(A)(iii) of the Clean Air Act (CAA) and is based on a comprehensive evaluation of the Five-Factor Analysis criteria: air quality data, emissions data, meteorology, geography and topography, and jurisdictional boundaries.

The Tribes operates a robust air monitoring program that aims to provide accurate and representative data for our lands. While the data collected at our federally approved air monitoring station indicates generally favorable air quality conditions for PM2.5, the current dataset is incomplete to definitively determine where PM2.5 levels meet the revised standards of 9.0 $\mu\text{g}/\text{m}^3$. Furthermore, the unique meteorological and topographical conditions in the region present complexities that require additional evaluation to fully understand their impact on PM2.5 concentrations.

Five-Factor Analysis Supporting Attainment Designation:

1. Air Quality Data:

- PM2.5 levels recorded at the Tribe's monitoring stations suggest compliance with the 2024 PM2.5 NAAQS; however, the dataset is limited and lacks sufficient historical data for regulatory purposes.
- Additional monitoring and analysis are needed to establish a comprehensive understanding of PM2.5 on Morongo's Tribal lands.

2. Emissions Data:

- Emissions from sources within Tribal jurisdiction are minimal and well-controlled, with no significant contribution to regional PM2.5 levels.
- The Tribe has implemented proactive measures to reduce emission, including sustainable land management practices and the promotion of clean energy initiatives.

3. Meteorology:

- Local meteorological patterns, including prevailing winds and seasonal temperature inversions, influence the dispersion and concentration of PM2.5 on Tribal Lands.

However, the current analysis does not fully capture these dynamics, necessitating further study.

4. Geography and Topography:

- Morongo Tribal lands are geographically distinct, located in a topographically unique area characterized by steep mountain ranges that act as a funnel, channeling winds and air pollution from neighboring regions from the west.
- These geographical features complicate the attribution of PM2.5 sources and require additional assessment.

5. Jurisdictional Boundaries:

- As a federally recognized Tribe with Treatment as a State (TAS) status, the Morongo Band of Mission Indians has the capacity and authority to manage air quality within its jurisdiction.
- A separate unclassifiable designation for the Morongo's Tribal lands acknowledges the current limitations in data while respecting Tribal sovereignty and jurisdiction.

Additional Considerations:

- The Tribe has a proven track record of effective air quality management, demonstrated through successful implementation of Clean Air Act programs and compliance with existing NAAQS.
- Collaboration with EPA Region 9 and the California Air Resources Board (CARB) continues to be a priority, ensuring alignment with broader air quality objectives.

We respectfully recommend that EPA designate Morongo Tribal lands as unclassifiable under the 2024 PM2.5 NAAQS. This designation reflects the current data limitations while allowing the Tribe to continue its efforts to improve air quality and management.

Thank you for your attention to this matter. We look forward to working with EPA to finalize this designation. Should you require additional information or wish to discuss this recommendation further, please do not hesitate to contact Pamela Atcitty at 951-755-5176 or email patcitty@morongo-nsn.gov.

Sincerely,



Charles Martin, Chairman
Morongo Band of Mission Indians

cc: Pamela Atcitty, Environmental Specialist II/Tribal Air Program
Matt Lakin, Air and Radiation Division Director, EPA Region 9
Anita Lee, Assistant Director, Air and Radiation Division, EPA Region 9