



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

October 15, 2008

Mr. Wayne Nastri
Regional Administrator
Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105-3901

Dear Mr. Nastri:

This is in response to your letter to Governor Arnold Schwarzenegger, transmitting the United States Environmental Protection Agency's (U.S. EPA) modifications to the California Air Resources Board's (ARB) recommendations for area designations under the federal air quality standards for particulate matter 2.5 microns or less in diameter (PM2.5).

We based the original recommendations on ambient PM2.5 data measured from 2004 through 2006, considering both emissions impacting elevated PM2.5 levels and public exposure to those levels. Reevaluation of these recommendations, based on 2005 through 2007 data, confirms our original assessment and recommendations for nonattainment area boundaries. We request that U.S. EPA modify the proposed nonattainment area boundaries to be consistent with California's recommendations. At issue are the proposed boundaries for the City of Calexico, Sacramento County, City of Chico, and the combined Cities of Yuba City/Marysville. We are in agreement on the boundaries for the South Coast Air Basin, San Joaquin Valley Air Basin, and San Francisco Bay Area. We have provided additional information to document the extent of international transport which causes localized impacts in Imperial County, and the localized impact of wood smoke in the other areas at issue.

An underlying premise for U.S. EPA's proposed PM2.5 boundaries is to provide consistency with existing ozone and PM10 nonattainment area boundaries. While that may be convenient from an administrative standpoint, the primary considerations in setting these boundaries should be scientific in nature. Our recommendations reflect the nature of the PM2.5 problem in each area. Where the problem is more localized than regional, we have recommended technically based nonattainment area boundaries that differ from ozone area boundaries. We note several areas elsewhere in the country where proposed designations are not consistent with ozone and PM10 nonattainment

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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area boundaries, such as those in the New York, New Jersey, Connecticut, and Tennessee. We request the same consideration.

If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Ms. Karen Magliano, Chief, Air Quality Data Branch, at (916) 322-7137.

Sincerely,

/s/

James N. Goldstene
Executive Officer

Enclosures

cc: See next page.

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cc: Brad Poirez, APCO
Imperial County Air Pollution Control District
150 South 9th Street
El Centro, California 92243

Jack Broadbent, APCO
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, California 94109-7799

Larry Green, APCO
Sacramento Metropolitan Air Quality Management District
777 12th Street, Third Floor
Sacramento, California 95814-1908

Seyed Sadredin, APCO
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg
Fresno, California 93736

Dave Valler, APCO
Feather River Air Quality Management District
938 14th Street
Marysville, California 95901-4149

W. James Wagoner, APCO
Butte County Air Quality Management District
2525 Dominic Drive, Suite J
Chico, California 95928-7184

Barry Wallerstein, APCO
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, California 91765-4182

Lynn Terry
Air Resources Board

Karen Magliano
Air Resources Board