



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

**AUG 22 2017**

**OFFICE OF THE  
REGIONAL ADMINISTRATOR**

The Honorable Edmund G. Brown, Jr.  
Governor  
State of California  
State Capital Building, Suite 1173  
Sacramento, California 95814

Dear Governor Brown:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) intended designations for California for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>). The designations for this NAAQS are an important part of the EPA's commitment to a clean, healthy environment. These intended designations are a response to designations-related recommendations and information your state submitted in a letter dated June 20, 2011 and in several subsequent submittals.<sup>1</sup>

On July 25, 2013, the EPA designated certain areas in 16 states as nonattainment, but did not at that time designate other areas. Additional areas were designated on June 30, 2016, and November 29, 2016. No areas in California were designated in these previous actions. Pursuant to a March 2, 2015, court-ordered schedule,<sup>2</sup> the agency must complete the remaining SO<sub>2</sub> designations by two specific deadlines: December 31, 2017, and December 31, 2020. Accordingly, pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of the EPA's assessment of your state's recommended designations for all areas in California. We agree with your recommendation for these areas.

If you or your staff have additional information that the EPA should consider prior to finalizing the designations, please submit it as soon as possible but no later than October 23, 2017. You may submit additional information by sending it to the EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at [www.regulations.gov](http://www.regulations.gov), and sending a copy to EPA Region 9. The EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on the EPA's intended designations.

California has recommended a designation of attainment for the area indicated below. EPA regulations for implementing the SO<sub>2</sub> NAAQS require California to characterize SO<sub>2</sub> air quality in the listed area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by

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<sup>1</sup> The California Air Resources Board and the Bay Area Air Quality Management District also provided information relevant to these designations in letters and other correspondence dated December 17, 2015, June 29, 2016, September 29, 2016, October 5, 2016, and March 23, 2017.

<sup>2</sup> *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

California, the Bay Area Air Quality Management District, or a third party. Our review of this information indicates that it is consistent with your recommendation. We invite California to review the available information and further discuss this issue with the EPA in order to inform an appropriate final designation.

Unclassifiable/Attainment Area*	Included Counties or Partial Counties (p)
San Francisco Bay Area Air Basin	Alameda County, Contra Costa County, Marin County, Napa County, San Francisco County, San Mateo County, Santa Clara County, Solano County (p), Sonoma County (p)

\* Includes areas of Indian country geographically located in the Air Basin

The enclosure to this letter provides the information that supports the intended designation decision for this area in California.<sup>3</sup>

Finally, we intend to designate as unclassifiable/attainment all remaining areas of California that were not required to be characterized and for which the EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas is included in the last section of the enclosure.

The EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. Upon the completion of this designation action, there will be no remaining areas in California to be designated.

We share your goal to provide cleaner air for citizens in your state. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO<sub>2</sub> NAAQS. For additional information regarding designations under the SO<sub>2</sub> NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to call me, or have your staff contact Meredith Kurpius at (415) 947-4534 or [kurpius.meredith@epa.gov](mailto:kurpius.meredith@epa.gov).

Sincerely,



*for*

Alexis Strauss  
Acting Regional Administrator

Enclosure

cc: See next page

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<sup>3</sup> The enclosure is Chapter 6 of the Technical Support Document for the designations the EPA plans to complete by December 31, 2017, that addresses areas in California. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>

cc: Matthew Rodriquez, Secretary, California Environmental Protection Agency  
Mary Nichols, Chair, California Air Resources Board (CARB)  
Richard Corey, Executive Officer, CARB  
Kurt Karperos, Deputy Executive Officer, CARB (by email)  
Karen Magliano, Chief, Air Quality Planning and Science Division, CARB (by email)  
Jack Broadbent, Air Pollution Control Officer, Bay Area Air Quality Management District  
Jean Roggenkamp, Deputy Executive Officer, BAAQMD (by email)