

October 27, 2022

Martha Guzman
Regional Administrator
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, California 94105
guzman.martha@epa.gov

Dear Administrator Guzman:

The California Air Resources Board (CARB) is requesting that the 2012 PM_{2.5} Standard Serious State Implementation Plan (SIP) portions of the San Joaquin Valley (Valley) *2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards* and the *San Joaquin Valley Supplement to the 2016 State Strategy for the State Implementation Plan (Plan)* submitted to the U.S. Environmental Protection Agency (U.S. EPA) on May 19, 2019 be withdrawn from inclusion in the California SIP. The San Joaquin Valley Air Pollution Control District (District) concurs with this request, as stated in their October 27, 2022 letter.

CARB and the District worked closely with U.S. EPA in the development of the Plan and proactively developed and committed to the Serious area requirements well in advance of the December 31, 2023 submittal deadline. After initially proposing to approve the Plan on December 29, 2021, U.S. EPA repropoed a disapproval of portions of the Plan including the treatment of ammonia as an attainment precursor, CARB's emission reduction commitment, and the District's assessment of best available control measures (BACM) for space and water heaters. This proposed disapproval of BACM and the ammonia precursor demonstration has ripple effects throughout the Plan causing disapproval of the attainment demonstration, reasonable further progress demonstration, quantitative milestones, and the motor vehicle emissions budgets. CARB does not agree with the proposed disapproval and supports the original proposed approval.

While not specifically disapproved, U.S. EPA directed CARB and the District that the upcoming SIP must provide assurances that the SIP complies with Title VI despite the fact that U.S. EPA has not yet provided states any guidance on how to effectively address this matter in the SIP. CARB anticipates that addressing Title VI will require significant resources state-wide, and thus requests U.S. EPA's assistance in securing the funding necessary to effectively implement Title VI requirements state-wide and across programs

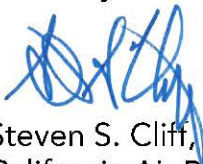
Air quality is improving in the Valley due to CARB and District regulations including the CARB Truck and Bus Regulation and the District's phase down of agricultural burning. Irrespective of the withdrawal, CARB will continue to implement the commitments in the Plan. SIP withdrawal and development of a new Serious SIP will enable the use of updated emission inventories, modeling information and allow the use of federal guidance that is still being developed. Ultimately, CARB and the District will develop an approvable SIP to meet the 12 ug/m³ annual standard as soon as possible.

However, U.S. EPA also needs to do its part. First, it is imperative that U.S. EPA regulate sources under their control such as a finalizing a strong heavy-duty truck standard aligned with California's already adopted omnibus low NOx regulation and developing new standards for locomotives. Also, quickly granting CARB waivers and authorizations for our regulations is essential for providing cleaner air for the Valley's residents. Further, with historic levels of Federal funding for clean technologies, CARB asks that the federal government prioritize these investments in extreme nonattainment areas to support the transition to clean, low-carbon vehicle and equipment technologies and infrastructure in the San Joaquin Valley and throughout California. In addition, as you are aware, California and other states throughout the nation continue to face major difficulties in demonstrating contingency requirements in the absence of new federal guidance. U.S. EPA must expeditiously develop and finalize functional guidance for contingency measures.

Given U.S. EPA's course reversal on Plan approval, the lack of needed federal guidance, the need for additional federal emissions reductions to expedite attainment, and the additional time available to review issues raised, CARB now formally withdraws the Plan submittal from consideration for inclusion in the California SIP. CARB and the District are committed to working together and with U.S. EPA to develop and submit a fully-approvable SIP for the 12 ug/m³ annual PM_{2.5} standard.

If you have any questions, please contact Ms. Edie Chang, Deputy Executive Officer at (916) 445-4383 or have your staff contact Dr. Michael Benjamin, Chief, Air Quality Planning and Science Division at (916) 201-8968.

Sincerely,



Steven S. Cliff, Ph.D., Executive Officer
California Air Resources Board

cc: Samir Sheikh, Air Pollution Control Officer, San Joaquin Valley Air Pollution Control District

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