Air Resources Board

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Arnold Schwarzenegger
Governor

February 4, 2004

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

Dear Mr. Nastri:

In your December 3, 2003 letter, the U.S. Environmental Protection Agency (U.S. EPA) notified Governor Schwarzenegger of its intent to modify California's July 15, 2003 recommendations for area designations under the federal eight-hour ozone air quality standard. The Air Resources Board (ARB or Board) is responding on behalf of the State of California.

U.S. EPA concurs with the majority of our recommendations and we appreciate the opportunity to provide additional information to support a few important modifications needed to address the remaining issues. We are asking U.S. EPA to change some proposed area designations and boundaries consistent with the most recent air quality data, and to clarify some area descriptions. We also request U.S. EPA's help on a transportation conformity issue that is vital to the new rural areas that will be designated nonattainment for the first time under the eight-hour ozone standard.

Bay Area Designation as Nonattainment

The San Francisco Bay Area should be added to the list of nonattainment areas because this region recorded violations of the standard in 2003. This is a change to our previous recommendation that was based on data through 2002. Using preliminary 2003 data for all of California, Enclosure 1 presents the State's updated recommendations for nonattainment, attainment, and unclassifiable area designations for the eight-hour ozone standard. We believe it is important and useful for U.S. EPA to distinguish between areas with monitoring data meeting the standard (attainment) and areas with insufficient monitoring data to determine compliance (unclassifiable), rather than blending the two together. Enclosure 2 includes legal descriptions of the corresponding boundaries for each of the State's recommended nonattainment areas.

Clarifications Needed on Area Descriptions

In the table enclosed with the December 3, 2003 letter, U.S. EPA described its proposed nonattainment areas in a general way. For three areas, the State's recommendations include subtle but important details that are not explicitly reflected in U.S. EPA's table. Staff discussions with Region 9 indicate agreement on these details. We request that U.S. EPA affirm its agreement in writing that:

- Eastern Kern County excludes Indian Wells Valley,
- Ventura County excludes Anacapa and San Nicolas Islands, and
- Western Mojave Desert includes those portions of San Bernardino County within the existing Southeast Desert Modified one-hour ozone nonattainment area, rather than all portions of San Bernardino County within the Mojave Desert Air Basin.

Changes Needed on Proposed Nonattainment Area Boundaries

We in are in agreement on which air districts in California violate the eight-hour ozone standard. The remaining issues involve U.S. EPA's proposal to consolidate a number of air districts into single nonattainment areas. This would affect five air districts in the Mountain Counties Air Basin and one air district in the Mojave Desert of southern California.

1. San Joaquin Valley and Mountain Counties U.S. EPA proposed to consolidate the Amador, Calaveras, Tuolumne, and Mariposa air districts with the San Joaquin Valley into one very large nonattainment area. We recommended separate nonattainment areas for the Central Mountain Counties (Amador and Calaveras) and Southern Mountain Counties (Tuolumne and Mariposa).

2. Nevada County and the Sacramento Region U.S. EPA similarly proposed to combine Western Nevada County with the Sacramento Region, while we recommended Western Nevada County as a separate nonattainment area.

3. Antelope Valley U.S. EPA proposed to group the Antelope Valley with the Western Mojave Desert area, while we recommended these as two separate nonattainment areas.

We continue to disagree with these proposals, and urge U.S. EPA to follow the State's July 2003 recommendations. Under the State's proposal the same districts would be designated nonattainment, but California would be able to most efficiently and effectively implement the new eight-hour ozone standard. We provide the technical and legal rationale for our recommendations below.

Rationale for Changes on Proposed Boundaries

Our recommendations for nonattainment area boundaries are consistent with federal statute, regulations, and guidance. Below, we highlight the rationale for U.S. EPA to reconsider its proposed modifications to the State's boundary recommendations. The Appendix to this letter provides additional support, including how U.S. EPA proposals for other states are consistent with what we are asking you to do here.

U.S. EPA's actions are very important to the impacted local agencies and officials. Enclosure 3 contains the letters we have received to date from local representatives who lay out their views of the best air quality planning structure for their area. In some cases, these letters offer more facts that distinguish these downwind rural areas from the upwind urban areas that would all be consolidated with the U.S. EPA proposal. Please consider these comments (and subsequent local letters) in your deliberations.

Consistency of Boundaries with Federal Guidance. In the December 3, 2003 letter, you provided direction on how to draw boundaries for the eight-hour ozone standard. First, U.S. EPA emphasized that California should use the larger of the Consolidated Metropolitan Statistical Area or Metropolitan Statistical Area (we refer to these collectively as the C/MSA), or the one-hour ozone nonattainment area, as the presumptive boundary for eight-hour ozone nonattainment areas. Second, the letter cites 11 factors in U.S. EPA boundary guidance that should be considered. The letter then makes incorrect reference to the Mountain Counties appearing to be part of the Sacramento and San Joaquin Valley airsheds before concluding that a regional approach appears best suited to addressing air quality.

We recognize U.S. EPA's desire to benefit air quality by consolidating upwind and downwind areas linked by transport. However, a closer examination of the facts and application of U.S. EPA's boundary principles clearly support making the foothills counties separate nonattainment areas from the upwind Sacramento Region and San Joaquin Valley. In fact, Western Nevada County, the Central Mountain Counties, and the Southern Mountain Counties all:

- Are in a different air basin (or airshed) than Sacramento and the San Joaquin Valley.
- Are outside the current one-hour ozone nonattainment area in the Sacramento Region and San Joaquin Valley.
- Are outside the C/MSAs in place in the Sacramento Region and San Joaquin Valley.
- Are less dense and less urbanized than the Sacramento Region and San Joaquin Valley.

- Have lower emissions and less severe ozone pollution than the Sacramento Region and San Joaquin Valley.
- Show significant elevation gain compared to the near-sea level Sacramento and San Joaquin Valleys.
- Have independent local air districts and transportation agencies, separate from the Sacramento Region and San Joaquin Valley.

Effective Air Quality Planning and Expeditious Attainment. Congress specifically recognized the importance and need for each *state* to be able to modify its air quality control regions, with the approval of the U.S. EPA Administrator, "for purposes of efficient and effective air quality management." [Clean Air Act section 107(e)(1)] California's recommendations for more nonattainment areas would result in the most effective structure for federal air quality planning and aid expeditious attainment of the eight-hour ozone standard to benefit public health.

While attainment in the Mountain Counties areas will depend primarily on further upwind and statewide controls, differences in the severity of the ozone problems indicate it is premature to assume that the downwind areas will need the same time to attain as their urban neighbors. Thus, U.S. EPA's proposal to combine upwind and downwind areas with a single attainment deadline may be less health-protective.

U.S. EPA's proposed modifications to the State's recommended nonattainment areas would force changes to the existing framework for air quality planning. In this era of budget shortages, it is especially important not to impose new federal mandates to change the structure for air quality planning in California. The State has already demonstrated a successful process to address intrastate transport across multiple nonattainment areas by linking regional attainment demonstrations in the State Implementation Plan (SIP) submittals.

Ability to Tap Existing Flexibility in Statute. U.S. EPA's proposed boundaries could also preclude the new rural nonattainment areas in the Mountain Counties from using the more flexible implementation provisions of Subpart 1 of the Clean Air Act. Instead, they would be faced with the more extensive and prescriptive mandatory requirements in Subpart 2 designed for severely polluted areas. If Western Nevada County, Central Mountain Counties, and Southern Mountain Counties are maintained as separate nonattainment areas, they would all qualify for entry into Subpart 1 according to U.S. EPA's current proposal for area classifications. We have consistently maintained that these new rural areas significantly affected by transport should be eligible for the streamlined requirements specifically allowed by federal law under Subpart 1.

Transportation Conformity in New Rural Nonattainment Areas

Regardless of whether U.S. EPA accepts California's recommendations or pursues its current proposal, transportation conformity will be a new requirement and analytical process for Nevada, Amador, Calaveras, Tuolumne, and Mariposa Counties. The vehicle population, miles traveled, and transportation investment in these counties are far less than in existing, largely urban nonattainment areas familiar with conformity.

We believe strongly that the conformity procedures in these new areas can and should be scaled down to reflect the scarcity of transportation improvement projects, the limited analytical tools available today, and the minimal staff resources. In these rural areas, the methods used to estimate the emissions impacts of potential transportation projects can be much more basic than in upwind cities that have invested considerable staff and financial resources in developing sophisticated transportation models and the data to supply those models. A simplified analytical approach can meet statutory and regulatory requirements. It can also be approved by U.S. EPA and the U.S. Department of Transportation under their existing discretion.

ARB is beginning discussions with the local air quality and transportation planning agencies and the California Department of Transportation aimed at developing appropriate conformity analysis methods and procedures for the new areas. We anticipate that each region will propose specific approaches during the public process for development of the required conformity SIPs. We ask that the federal agencies work with California to devise complying procedures that minimize the burden on local transportation and air quality agencies.

Changes Needed on Proposed Attainment Status

U.S. EPA proposed to designate all of Sutter and Yuba Counties as nonattainment based on 2003 ozone data from the special purpose monitor designed to measure high-elevation transport atop the isolated Sutter Buttes Mountains. Because neither monitor in Sutter and Yuba Counties shows community exposure to ozone levels above the eight-hour standard, it is appropriate for this region to be designated attainment. The Appendix provides the rationale for changes to U.S. EPA's proposal in this region.

Transmittal of Updated Ozone Monitoring Data

We are working with local air districts and other responsible agencies to expedite reporting, quality assurance, and analysis of 2003 ozone data as you requested. We expect to transmit data for 2001-2003 as soon as possible in March 2004, so it can be reflected in your promulgation of eight-hour ozone designations and classifications.

To facilitate public access, we have posted this transmittal and related materials on our website at: http://www.arb.ca.gov/planning/sip/sip.htm.

If you have questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739 or have your staff contact Ms. Cynthia Marvin, Chief, Air Quality and Transportation Planning Branch, at (916) 322-7236.

Sincerely,

/s/

Catherine Witherspoon
Executive Officer

Appendix and Enclosures

cc: See next page.

cc: (All with Appendix and Enclosure 1)

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Air Pollution Control Officers

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Appendix to California Air Resources Board Response on Proposed Eight-Hour Ozone Area Designations

ADDITIONAL INFORMATION TO SUPPORT THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S RECONSIDERATION OF PROPOSED AREA BOUNDARIES AND DESIGNATIONS

The U.S. Environmental Protection Agency's (U.S. EPA) proposal for eight-hour ozone designations differs from the State recommendations provided by the Air Resources Board (ARB or Board) regarding the appropriate boundaries for several nonattainment areas and the attainment status of one area.

1. U.S. EPA proposed to include the foothill counties of Amador, Calaveras, Tuolumne, and Mariposa with the eight-county San Joaquin Valley as one very large nonattainment area. The State recommended separate nonattainment areas for the Central Mountain Counties (Amador and Calaveras) and Southern Mountain Counties (Tuolumne and Mariposa).

2. U.S. EPA similarly proposed to combine Western Nevada County with the five-county Sacramento Region, while we recommended Western Nevada County as a separate nonattainment area.

3. U.S. EPA proposed to group the Antelope Valley with the Western Mojave Desert area, while we recommended these as two separate nonattainment areas.

4. U.S. EPA proposed to designate all of Sutter and Yuba Counties as nonattainment based on 2003 ozone data from the special purpose monitor designed to measure high-elevation transport atop the Sutter Buttes, while the State recommended these counties as an attainment area.

We ask that you reconsider modifying California's recommendations in the areas where we disagree and designate nonattainment areas and boundaries based on Enclosures 1 and 2. The areas of disagreement are within U.S. EPA's discretion to resolve. Our letter, this Appendix, and the correspondence from local officials all provide additional information to support our request.

Boundary Issues

<u>U.S. EPA's proposal should accommodate state planning structures.</u> In California, the primary considerations for air quality planning are air basin and air district boundaries. Under State law, air basins are based on a rigorous scientific assessment of geography and meteorology, and consideration of political jurisdictions. Basin boundaries are formally adopted by the Board in regulation, with a full public process. The State's 35 local air districts are based on county structure, with large metropolitan areas that cross county lines governed by the same air district in the case of the greater Los Angeles

region, the San Francisco Bay Area, and the San Joaquin Valley. Nevada, Amador, Calaveras, Tuolumne, and Mariposa Counties are each under the jurisdiction of a county air district. To reflect existing inter-county coordination and similarities in pollution transport paths, we have already proposed to group Amador and Calaveras together and Tuolumne and Mariposa together. Antelope Valley and Western Mojave Desert are also independent air districts with separate governing boards.

In March 2000 correspondence from former Region 9 Air Director David Howekamp to ARB, U.S. EPA concurred with our prior recommendations for more separate eight-hour ozone nonattainment areas, but stated its expectation that ARB would package the State Implementation Plans (SIPs) to make clear how the combination of plans demonstrates attainment in all parts of the State.

The federal Clean Air Act requires U.S. EPA to address interstate and international transport, but transport within a single state has historically been within the purview of that state. As described in our July 15, 2003 letter to you, California has the mechanisms in place to do so effectively. ARB is mandated to coordinate all local air district activities relative to the federal Clean Air Act, including ensuring that the SIP achieves attainment throughout California. State law addresses this issue further by requiring upwind air districts to mitigate air pollutant transport. The requirements on upwind districts also include the adoption of all feasible measures and parity with the downwind area's program to address new and modified stationary sources. This State requirement will underpin the local SIPs.

California's shared air pollution authority, with independent local jurisdictions overseeing air quality strategies for businesses and ARB tackling mobile sources, is a demonstrated effective approach to solving some of the country's greatest air quality challenges. Over the last 30 to 40 years, California has relied on this approach to make unparalleled progress toward clean air.

<u>California's boundary recommendations meet U.S. EPA criteria.</u> In its December 3, 2003 letter, U.S. EPA emphasized that California should use the larger of the Consolidated Metropolitan Statistical Area or Metropolitan Statistical Area (we refer to these collectively as the C/MSA), or the one-hour ozone nonattainment area, as the presumptive boundary for the eight-hour ozone nonattainment areas. The letter also references 11 factors described in U.S. EPA boundary guidance that should be considered. Our recommendations (including creation of separate nonattainment areas for Western Nevada County, Central Mountain Counties, Southern Mountain Counties, Antelope Valley, and Western Mojave Desert) are consistent with the federal guidance. We considered geography and meteorology via air basin boundaries, location of emission sources, transportation corridors, metropolitan areas, existing nonattainment boundaries, and political jurisdictions.

Below, we highlight some of the differences between the downwind regions that the State recommends as distinct nonattainment areas and the upwind areas that U.S. EPA has proposed to combine them with. These differences support separation.

- The Central and Southern Mountain Counties are in a different air basin than the San Joaquin Valley. U.S. EPA incorrectly noted that they appear to be part of the same airshed. They are both outside the San Valley Valley C/MSAs . In fact, these areas are so sparsely populated that they are not part of any C/MSA. Neither were they included in any existing nonattainment area for the one-hour standard; they both attain the one-hour standard. As shown on Enclosure 1, eight-hour ozone levels are distinct as well. The eight-hour ozone design value for San Joaquin Valley is 25 percent higher than Central Mountain Counties and Southern Mountain Counties. The emission density in the Valley is more than double the value in Central or Southern Mountain Counties.

- Western Nevada County is in a separate air basin from Sacramento. U.S. EPA incorrectly noted that they appear to be part of the same airshed. Western Nevada County is also outside the Sacramento Region's C/MSA and one-hour ozone nonattainment area. Eight-hour ozone design values are eight percent higher in the State's proposed Sacramento Region than in Western Nevada County. The emission density is seven times higher in the Sacramento Region than in Western Nevada County.

- Different political jurisdictions, with separate governing boards, regulate air pollution sources in the Antelope Valley and Western Mojave Desert. The two regions are also characterized by significantly different traffic corridors and have distinct pollution transport paths from the South Coast. Antelope Valley sits astride State Highway 14 with travel north out of the South Coast basin to the eastern Sierras. Traffic out of the South Coast to Western Mojave Desert flows northeast along Interstate 15 to Las Vegas. Similarly, pollution flows out of the South Coast along the same separate routes, passing over Soledad Pass on Highway 14 into Antelope Valley and Cajon Pass on Interstate 15 into the Western Mojave Desert.

In its December 2003 letters to all states, U.S. EPA has recognized the need for some downwind regions to be in separate nonattainment areas and not grouped with upwind areas. For example, in Wisconsin, U.S. EPA proposed to establish three small downwind counties (Manitowoc, Kewaunee, Door) in a south to north transport corridor as separate, single-county nonattainment areas, each distinct from southerly upwind Sheboygan and Milwaukee-Racine, as well as Chicago, Illinois.

<u>Needed technical and regulatory elements are in place to ensure robust SIPs.</u> As part of our role in coordinating air quality planning among the local air districts, ARB has in place air quality models that span the entire State. Consequently, even with multiple downwind nonattainment areas, the assessment of the attainment strategies will be done as a whole.

The Central California Ozone Study has produced an air quality model that will allow California to develop SIPs for the downwind regions that reflect upwind control strategies. Attainment in Western Nevada County and the Central and Southern Mountain Counties will rely in large part on emission reductions from the contributing

upwind districts and statewide programs. Similarly, the Southern California Ozone Study covers both Antelope Valley and Western Mojave Desert, providing a tool to assess simultaneously attainment in both regions.

We are just beginning to examine eight-hour ozone levels using these new models. This work will provide much needed insight as to how long it will take to bring the downwind regions into attainment, reflecting further upwind and statewide controls. Differences in the severity of the ozone problem between regions indicate it is premature to assume that the downwind areas will need the same time to attain as their urban neighbors.

Attainment Status Issue

In July 2003, we recommended that all of Sutter and Yuba Counties be designated attainment – all monitors in the counties met the standard at that time. U.S. EPA proposes to designate all of Sutter and Yuba Counties as a nonattainment area based on violations of the standard in August 2003 at a high elevation transport site.

Sutter and Yuba Counties are under the jurisdiction of the Feather River Air Quality Management District. They lie in the middle of the Sacramento Valley, where the majority of the land is at near-sea level. There are two monitors in this region. The first is in the population center of Yuba City at 60 feet elevation, which measures attainment of the standard with a design value of 0.079 parts per million (ppm). The second is a special purpose monitor at 2,100 feet elevation atop South Butte in the Sutter Buttes Mountains, an isolated volcanic projection rising starkly from the Valley floor. ARB sited this monitor to study high-elevation transport of pollutants from the Sacramento urban area into the upper Sacramento Valley. There are no pollution sources or communities near this site. The Sutter Buttes monitor shows ozone levels over the standard, with a design value of 0.088 ppm. Because neither monitor in Sutter and Yuba Counties shows community exposure to ozone levels above the eight-hour standard, it is still appropriate for this region to be designated attainment.

However, If U.S. EPA believes it must use the values from the isolated Sutter Buttes monitor for area designations, we ask that the geographic scope of the resulting nonattainment area be limited the part of Sutter County above 2,000 feet elevation represented by the Sutter Buttes monitor. This approach would be consistent with U.S. EPA's proposals for similar high-elevation transport monitors elsewhere in the country. For example, the monitor on Whiteface Mountain (at 1,965 feet elevation) in New York violates the standard due to high-altitude transport, while monitors in neighboring counties at lower elevation do not. In its December 2003 letter to New York, U.S. EPA proposes a nonattainment area encompassing only the portions of the county above 1,900 feet elevation. U.S. EPA proposes parallel approaches for mountain-top nonattainment areas in Georgia and North Carolina.

In year 2000 correspondence from former Region 9 Air Director David Howekamp, U.S. EPA expressed support for a nonattainment area in Sutter County above 2,000 feet elevation. Region 9 further indicated that the area would not be subject to control requirements, and the local area would not be required to prepare a SIP. Instead, the SIP for the upwind area could include a regional modeling demonstration showing that this elevated site will attain the standard as a result of upwind controls and the statewide program. This approach is preferable to designating the full two-county area as nonattainment.

If U.S. EPA aligns its proposal for the Sutter Buttes consistent with its policy in other states, there is another potential question on the attainment status of Sutter County. The southernmost tip of Sutter County is included in the Sacramento Metropolitan one-hour ozone nonattainment area because a large development was planned in that part of the county during U.S. EPA's 1991 designation process. Since that development has not materialized and the area remains agricultural, we support the Feather River District's request that South Sutter County be excluded from the Sacramento Region eight-hour nonattainment area. Enclosure 3 includes a letter from the Feather River District attaching a draft resolution for its governing board to affirm its intent to continue coordination on rulemaking and transportation planning with the other agencies in the Sacramento Region.

Apart from the Sutter Buttes transport related site, if future air monitoring in the Feather River District should show violations of the federal eight-hour ozone standard, we would support a nonattainment designation at that time. We will continue to assess new monitoring data for all areas of California to identify any appropriate changes to eight-hour ozone designations.

Enclosure 1

State of California
Updated Recommendations for Area Designations
under the Federal Eight-Hour Ozone Standard
(based on preliminary data for 2001 – 2003)

Recommended Eight-Hour Ozone Nonattainment Areas in California		
Area	**Design Value[1] (ppm)**	**Includes**
1. South Coast Air Basin	0.131	Western Los Angeles (including Catalina and San Clemente Islands), Orange, Southwestern San Bernardino, and Western Riverside Counties
2. San Joaquin Valley	0.115	San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare, and Western Kern Counties
3. Coachella Valley	0.108	Central Riverside County
4. Sacramento Region	0.107	Sacramento, Yolo, Eastern Solano, Western El Dorado and Western Placer Counties
5. Western Mojave Desert	0.106	Central San Bernardino County
6. Western Nevada County	0.098	Western Nevada County, west of the crest of the Sierra Nevada
7. Eastern Kern County	0.098	Eastern Kern County, east of the Tehachapi Mountains, excluding the Indian Wells Valley
8. Ventura County	0.095	Continental portion of Ventura County (excludes Anacapa and San Nicolas Islands)
9. San Diego County	0.093	San Diego County
10. Antelope Valley	[2]	Northeastern Los Angeles County
11. Central Mountain Counties	0.091	Amador and Calaveras Counties
12. Southern Mountain Counties	0.091	Tuolumne and Mariposa Counties
13. Butte County	0.088	Butte County
14. Imperial County	0.087	Imperial County
15. San Francisco Bay Area	0.086	Marin, Southern Sonoma, Napa, Western Solano, Contra Costa, Alameda, Santa Clara, San Francisco, San Mateo Counties

[1] Design value is the three-year average of the annual fourth highest eight-hour ozone concentration at the highest monitor (less than 0.085 ppm = attainment, 0.085 ppm or greater = nonattainment). All 2003 data are preliminary and subject to change.

2 The monitor was moved in 2001. Therefore, a three-year design value cannot be calculated until 2004 ozone season data are available. The 4th highs for 2002 and 2003 are 0.102 and 0.104, respectively. Given such high values, ARB has concluded that the area violates the eight-hour ozone standard.

Enclosure 1 (continued)

State of California
Updated Recommendations for Area Designations
under the Federal Eight-Hour Ozone Standard
(based on preliminary data for 2001 – 2003)

Recommended Eight-Hour Ozone Attainment Areas in California
Northeast Plateau Air Basin (includes Siskiyou, Modoc, and Lassen Counties)
North Coast Air Basin (includes Del Norte, Humboldt, Trinity, Mendocino, and Northern Sonoma Counties)
Shasta County
Tehama County
Glenn County
Lake County
Colusa County
Sutter County
Yuba County
Northern Mountain Counties (includes Plumas and Sierra Counties)
Eastern Nevada County (the portion east of the crest of the Sierras -- see Appendix B for detail)
Eastern Placer County (the portion located in the Lake Tahoe Air Basin)
Eastern El Dorado County (the portion located in the Lake Tahoe Air Basin)
North Central Coast Air Basin (includes Monterey, San Benito, and Santa Cruz Counties)
Indian Wells Valley (the northeastern portion of Eastern Kern County)
Great Basin Valleys Air Basin (includes Alpine, Mono, and Inyo Counties)
San Luis Obispo County
Santa Barbara County (excluding Channel Islands)
Northern Channel Islands (the islands located in the South Central Coast Air Basin, including San Miguel, Santa Rosa, Santa Cruz, Anacapa, San Nicolas, and Santa Barbara)

Recommended Eight-Hour Ozone Unclassifiable Areas in California
Far Eastern Riverside and Far Eastern San Bernardino Counties*

*ARB began operating a monitor in Blythe (at the far eastern side of this area) in early 2003 to monitor ozone levels in this region. The highest value measured to date is 0.071 ppm. ARB intends to continue operating this monitor to support a final determination for this currently unclassifiable region.

Enclosure 2

State of California
Boundary Descriptions for Recommended Nonattainment Areas under the Federal Eight-Hour Ozone Standard

1. South Coast Air Basin

Los Angeles County (part) - that portion of Los Angeles County which lies south and west of a line described as follows: Beginning at the Los Angeles – San Bernardino County boundary and running west along the Township line common to Township 3 North and Township 2 North, San Bernardino Base and Meridian; then north along the range line common to Range 8 West and Range 9 West; then west along the Township line common to Township 4 North and Township 3 North; then north along the range line common to Range 12 West and Range 13 West to the southeast corner of Section 12, Township 5 North and Range 13 West; then west along the south boundaries of Sections 12, 11, 10, 9, 8, and 7, Township 5 North and Range 13 West to the boundary of the Angeles National Forest which is collinear with the range line common to Range 13 West and Range 14 West; then north and west along the Angeles National Forest boundary to the point of intersection with the Township line common to Township 7 North and Township 6 North (point is at the northwest corner of Section 4 in Township 6 North and Range 14 West); then west along the Township line common to Township 7 North and Township 6 North; then north along the range line common to Range 15 West and Range 16 West to the southeast corner of Section 13, Township 7 North and Range 16 West; then along the south boundaries of Sections 13, 14, 15, 16, 17, and 18, Township 7 North and Range 16 West; then north along the range line common to Range 16 West and Range 17 West to the north boundary of the Angeles National Forest (collinear with the Township line common to Township 8 North and Township 7 North); then west and north along the Angeles National Forest boundary to the point of intersection with the south boundary of the Rancho La Liebre Land Grant; then west and north along this land grant boundary to the Los Angeles-Kern County boundary.

Orange County

Riverside County (part) - that portion of Riverside County which lies to the west of a line described as follows: Beginning at the Riverside - San Diego County boundary and running north along the range line common to Range 4 East and Range 3 East, San Bernardino Base and Meridian; then east along the Township line common to Township 8 South and Township 7 South; then north along the range line common to Range 5 East and Range 4 East; then west along the Township line common to Township 6 South and Township 7 South to the southwest corner of Section 34, Township 6 South, Range 4 East; then north along the west boundaries of Sections 34, 27, 22, 15, 10, and 3, Township 6 South, Range 4 East; then west along the Township line common to Township 5 South and Township 6 South; then north along the

range line common to Range 4 East and Range 3 East; then west along the south boundaries of Sections 13, 14, 15, 16, 17, and 18, Township 5 South, Range 3 East; then north along the range line common to Range 2 East and Range 3 East; to the Riverside – San Bernardino County line.

San Bernardino County (part) - that portion of San Bernardino County which lies south and west of a line described as follows: Beginning at the San Bernardino - Riverside County boundary and running north along the range line common to Range 3 East and Range 2 East, San Bernardino Base and Meridian; then west along the Township line common to Township 3 North and Township 2 North to the San Bernardino - Los Angeles County boundary.

2. San Joaquin Valley

San Joaquin County
Stanislaus County
Merced County
Madera County
Fresno County
Kings County
Tulare County

Kern County (part) - That portion of Kern County which lies west and north of a line described as follows: Beginning at the Kern-Los Angeles County boundary and running north and east along the northwest boundary of the Rancho La Libre Land Grant to the point of intersection with the range line common to R. 16 W. and R. 17 W., San Bernardino Base and Meridian; north along the range line to the point of intersection with the Rancho El Tejon Land Grant boundary; then southeast, northeast, and northwest along the boundary of the Rancho El Tejon Land Grant to the northwest corner of S. 3, T. 11 N., R. 17 W.; then west 1.2 miles; then north to the Rancho El Tejon Land Grant boundary; then northwest along the Rancho El Tejon line to the southeast corner of S. 34, T. 32 S., R. 30 E., Mount Diablo Base and Meridian; then north to the northwest corner of S. 35, T. 31 S., R. 30 E.; then northeast along the boundary of the Rancho El Tejon Land Grant to the southwest corner of S. 18, T. 31 S., R. 31 E.; then east to the southeast corner of S. 13, T. 31 S., R. 31 E.; then north along the range line common to R. 31 E. and R. 32 E., Mount Diablo Base and Meridian, to the northwest corner of S. 6, T. 29 S., R. 32 E.; then east to the southwest corner of S. 31, T. 28 S., R. 32 E.; then north along the range line common to R. 31 E. and R. 32 E. to the northwest corner of S. 6, T. 28 S., R. 32 E., then west to the southeast corner of S. 36, T. 27 S., R. 31 E., then north along the range line common to R. 31 E. and R. 32 E. to the Kern-Tulare County boundary.

3. Coachella Valley

Riverside County (part) - that portion of Riverside County which lies to the east of a line described as follows: Beginning at the Riverside - San Diego County boundary and running north along the range line common to Range 4 East and Range 3 East, San Bernardino Base and Meridian; then east along the

Township line common to Township 8 South and Township 7 South; then north along the range line common to Range 5 East and Range 4 East; then west along the Township line common to Township 6 South and Township 7 South to the southwest corner of Section 34, Township 6 South, Range 4 East; then north along the west boundaries of Sections 34, 27, 22, 15, 10, and 3, Township 6 South, Range 4 East; then west along the Township line common to Township 5 South and Township 6 South; then north along the range line common to Range 4 East and Range 3 East; then west along the south boundaries of Sections 13, 14, 15, 16, 17, and 18, Township 5 South, Range 3 East; then north along the range line common to Range 2 East and Range 3 East; to the Riverside-San Bernardino County line.

And that portion of Riverside County which lies to the west of a line described as follows: That segment of the southwestern boundary line of Hydrologic Unit Number 18100100 within Riverside County, further described as follows: Beginning at the Riverside-Imperial County boundary and running north along the range line common to Range 17 East and Range 16 East, San Bernardino Base and Meridian; then northwest along the ridge line of the Chuckwalla Mountains, through Township 8 South, Range 16 East and Township 7 South, Range 16 East, until the Black Butte Mountain, elevation 4504'; then west and northwest along the ridge line to the southwest corner of Township 5 South, Range 14 East; then north along the range line common to Range 14 East and Range 13 East; then west and northwest along the ridge line to Monument Mountain, elevation 4834'; then southwest and then northwest along the ridge line of the Little San Bernardino Mountains to Quail Mountain, elev. 5814'; then northwest along the ridge line to the Riverside-San Bernardino County line.

4. Sacramento Region

El Dorado County (part) - All portions of the county except that portion of El Dorado County within the drainage area naturally tributary to Lake Tahoe including said Lake.

Placer County (part) - All portions of the county except that portion of Placer County within the drainage area naturally tributary to Lake Tahoe including said Lake, plus that area in the vicinity of the head of the Truckee River described as follows: commencing at the point common to the aforementioned drainage area crestline and the line common to Townships 15 North and 16 North, Mount Diablo Base and Meridian, and following that line in a westerly direction to the northwest corner of Section 3, Township 15 North, Range 16 East, Mount Diablo Base and Meridian, thence south along the west line of Sections 3 and 10, Township 15 North, Range 16 East, Mount Diablo Base and Meridian, to the intersection with the said drainage area crestline, thence following the said drainage area boundary in a southeasterly, then northeasterly direction to and along the Lake Tahoe Dam, thence following the said drainage area crestline in a northeasterly, then northwesterly direction to the point of beginning.

Sacramento County

Solano County (part) - That portion of Solano County which lies north and east of a line described as follows: beginning at the intersection of the westerly boundary of Solano County and the 1/4 section line running east and west through the center of Section 34; Township 6 North, Range 2 West, Mount Diablo Base and Meridian, thence east along said 1/4 section line to the east boundary of Section 36, Township 6 North, Range 2 West, thence south 1/2 mile and east 2.0 miles, more or less, along the west and south boundary of Los Putos Rancho to the northwest corner of Section 4, Township 5 North, Range 1 West, thence east along a line common to Township 5 North and Township 6 North to the northeast corner of Section 3, Township 5 North, Range 1 East, thence south along section lines to the southeast corner of Section 10, Township 3 North, Range 1 East, thence east along section lines to the south 1/4 corner of Section 8, Township 3 North, Range 2 East, thence east to the boundary between Solano and Sacramento Counties.

Yolo County

5. Western Mojave Desert

San Bernardino County (part) - that portion of San Bernardino County which lies north and east of a line described as follows: Beginning at the San Bernardino - Riverside County boundary and running north along the range line common to Range 3 East and Range 2 East, San Bernardino Base and Meridian; then west along the Township line common to Township 3 North and Township 2 North to the San Bernardino - Los Angeles County boundary; And that portion of San Bernardino County which lies south and west of a line described as follows: latitude 35 degrees, 10 minutes north and longitude 115 degrees, 45 minutes west.

6. Western Nevada County

Nevada County (part) - that portion of Nevada County, which lies west of a line, described as follows: beginning at the Nevada-Placer County boundary and running north along the western boundaries of Sections 24, 13, 12, 1, Township 17 North, Range 14 East, Mount Diablo Base and Meridian, and Sections 36, 25, 24, 13, 12, Township 18 North, Range 14 East to the Nevada-Sierra County boundary.

7. Eastern Kern County

Kern County (part) **-** that portion of Kern County (with the exception of that portion in Hydrologic Unit Number 18090205 --the Indian Wells Valley) east and south of a line described as follows: Beginning at the Kern – Los Angeles County boundary and running north and east along the northwest boundary of the Rancho La Liebre Land Grant to the point of intersection with the range line common to Range 16 West and Range 17 West, San Bernardino Base and Meridian; north along the range line to the point of intersection with the Rancho El Tejon Land Grant boundary; then southeast, northeast, and northwest along the boundary of the Rancho El Tejon Grant to the northwest corner of Section 3, Township 11 North, Range 17 West; then

west 1.2 miles; then north to the Rancho El Tejon Land Grant boundary; then northwest along the Rancho El Tejon line to the southeast corner of Section 34, Township 32 South, Range 30 East, Mount Diablo Base and Meridian; then north to the northwest corner of Section 35, Township 31 South, Range 30 East; then northeast along the boundary of the Rancho El Tejon Land Grant to the southwest corner of Section 18, Township 31 South, Range 31 East; then east to the southeast corner of Section 13, Township 31 South, Range 31 East; then north along the range line common to Range 31 East and Range 32 East, Mount Diablo Base and Meridian, to the northwest corner of Section 6, Township 29 South, Range 32 East; then east to the southwest corner of Section 31, Township 28 South, Range 32 East; then north along the range line common to Range 31 East and Range 32 East to the northwest corner of Section 6, Township 28 South, Range 32 East, then west to the southeast corner of Section 36, Township 27 South, Range 31 East, then north along the range line common to Range 31 East and Range 32 East to the Kern – Tulare County boundary.

8. Ventura County

(excluding Anacapa and San Nicolas Islands)

9. San Diego County

10. Antelope Valley

Los Angeles County (part) - that portion of Los Angeles County which lies north and east of a line described as follows: Beginning at the Los Angeles - San Bernardino County boundary and running west along the Township line common to Township 3 North and Township 2 North, San Bernardino Base and Meridian; then north along the range line common to Range 8 West and Range 9 West; then west along the Township line common to Township 4 North and Township 3 North; then north along the range line common to Range 12 West and Range 13 West to the southeast corner of Section 12, Township 5 North and Range 13 West; then west along the south boundaries of Sections 12, 11, 10, 9, 8, and 7, Township 5 North and Range 13 West to the boundary of the Angeles National Forest which is collinear with the range line common to Range 13 West and Range 14 West; then north and west along the Angeles National Forest boundary to the point of intersection with the Township line common to Township 7 North and Township 6 North (point is at the northwest corner of Section 4 in Township 6 North and Range 14 West); then west along the Township line common to Township 7 North and Township 6 North; then north along the range line common to Range 15 West and Range 16 West to the southeast corner of Section 13, Township 7 North and Range 16 West; then along the south boundaries of Sections 13, 14, 15, 16, 17, and 18, Township 7 North and Range 16 West; then north along the range line common to Range 16 West and Range 17 West to the north boundary of the Angeles National Forest (collinear with the Township line common to Township 8 North and Township 7 North); then west and north

along the Angeles National Forest boundary to the point of intersection with the south boundary of the Rancho La Liebre Land Grant; then west and north along this land grant boundary to the Los Angeles-Kern County boundary.

11. Central Mountain Counties

Calaveras County
Amador County

12. Southern Mountain Counties

Mariposa County
Tuolumne County

13. Butte County

14. Imperial County

15. San Francisco Bay Area

Sonoma County (part)- That portion of Sonoma County which lies south and east of a line described as follows: Beginning at the southeasterly corner of the Rancho Estero Americano, being on the boundary line between Marin and Sonoma Counties, California; thence running northerly along the easterly boundary line of said Rancho Estero Americano to the northeasterly corner thereof, being an angle corner in the westerly boundary line of Rancho Canada de Jonive; thence running along said boundary of Rancho Canada de Jonive westerly, northerly and easterly to its intersection with the easterly line of Graton Road; thence running along the easterly and southerly line of Graton Road, northerly and easterly to its intersection with the easterly line of Sullivan Road; thence running northerly along said easterly line of Sullivan Road to the southerly line of Green Valley Road; thence running easterly along the said southerly line of Green Valley Road and easterly along the southerly line of State Highway 116, to the westerly line of Vine Hill Road; thence running along the westerly and northerly line of Vine Hill Road, northerly and easterly to its intersection with the westerly line of Laguna Road; thence running northerly along the westerly line of Laguna Road and the northerly projection thereof to the northerly line of Trenton Road; thence running westerly along the northerly line of said Trenton Road to the easterly line of Trenton-Healdsburg Road; thence running northerly along said easterly line of Trenton-Healdsburg Road to the easterly line of Eastside Road; thence running northerly along said easterly line of Eastside Road to its intersection with the southerly line of Rancho Sotoyome; thence running easterly along said southerly line of Rancho Sotoyome to its intersection with the Township line common to Townships 8 and 9 North, M.D.M.; thence running easterly along said township line to its intersection with the boundary line between Sonoma and Napa Counties.

Napa County

Solano County (part) - Portion of Solano County which lies south and west of a line described as follows: Beginning at the intersection of the westerly boundary of Solano County and the 1/4 section line running east and west through the center of Section 34, T6N, R2W, M.D.B. & M., thence east along said 1/4 section line to the east boundary of Section 36, T6N, R2W, thence south 1/2 mile and east 2.0 miles, more or less, along the west and south boundary of Los Putos Rancho to the northwest corner of Section 4, T5N, R1W, thence east along a line common to T5N and T6N to the northeast corner of Section 3, T5N, R1E, thence south along section lines to the southeast corner of Section 10, T3N, R1E, thence east along section lines to the south 1/4 corner of Section 8, T3N, R2E, thence east to the boundary between Solano and Sacramento Counties.

Contra Costa County

Alameda County

Santa Clara County

San Mateo County

San Francisco County

Marin County

Enclosure 3

State of California

Correspondence from Local Officials on Area Designations under the Federal Eight-Hour Ozone Standard

Signatory	Recipient	Date
The Honorable Sam Aanestad California State Senate	The Honorable Arnold Schwarzenegger Governor State of California	January 28, 2004
Mr. Kerry Arnett Chairman Nevada County Transportation Commission	The Honorable Arnold Schwarzenegger Governor State of California	January 21, 2004
Ms. Gretchen Bennitt Air Pollution Control Officer Northern Sierra Air Quality Management District (attachments provided directly to U.S. EPA)	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	February 3, 2004
Mr. Mario Biagi Chairman Amador County Board of Supervisors	Ms. Catherine Witherspoon Executive Officer California Air Resources Board	January 20, 2004
Mr. George A. Dondero, II Executive Director Calaveras Council of Governments	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	January 20, 2004
Mr. Larry Greene President California Air Pollution Control Officers Association	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	February 4, 2004
Mr. Arnold Gutman Chairman Mountain Counties Air Basin Control Council	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	January 29, 2004
Mr. Brent Harrington President and CEO Regional Council of Rural Counties	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	January 30, 2004
Mr. James L. Harris Air Pollution Control Officer Amador County Air Pollution Control District	Ms. Catherine Witherspoon Executive Officer California Air Resources Board	January 12, 2004
The Honorable Patti Ingram Mayor City of Grass Valley	City Council Resolution #04-02	January 27, 2004
The Honorable Rick Keene California State Assembly	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	January 16, 2004
Mr. Cooper J. Kessel Chairman Tuolumne County and Cities Area Planning Council	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	January 29, 2004
Mr. Cooper J. Kessel Chairman Tuolumne County and Cities Area Planning Council	Alan C. Lloyd, Ph.D. Chairman California Air Resources Board	January 29, 2004

Signatory	Recipient	Date
Mr. Thomas Paxson, P.E. Air Pollution Control Officer Kern County Air Pollution Control District	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	December 9, 2003
Mr. Richard Pland Chairman Tuolumne County Board of Supervisors	The Honorable Barbara Boxer United States Senate	January 20, 2004
Mr. Richard Pland Chairman Tuolumne County Board of Supervisors	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	January 20, 2004
Mr. Steven A. Speckert Air Pollution Control Officer Feather River Air Quality Management District	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	December 19, 2003
Mr. Steven A. Speckert Air Pollution Control Officer Feather River Air Quality Management District	Ms. Catherine Witherspoon Executive Officer California Air Resources Board	February 2, 2004
Ms. Robin Sutherland Chairperson Nevada County Board of Supervisors	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	January 6, 2004
Mr. Tom Tryon Chairman Calaveras County Board of Supervisors	Mr. Wayne Nastri Regional Administrator - Region 9 U.S. Environmental Protection Agency	January 26, 2004