

Good Morning, my name is Christian Bisher with the Central California Environmental Justice Network and resident of the San Joaquin Valley.

An initial moderate classification is assigned when areas are designated nonattainment. However, I very strongly urge the board to add language to the resolution this morning asking the EPA to reclassify the Valley as soon as possible to serious nonattainment, which they are legally allowed to do. An immediate reclassification to serious nonattainment would allow the SIP for this new standard to be placed on the same level as existing Valley PM2.5 SIPs, and eliminate the need for agency staff to spend time creating a moderate nonattainment SIP. This is done when the EPA believes an area cannot practicably attain a moderate area attainment date.

Over 25 years, Valley SIPs have reduced annual PM2.5 design values by 8.5 micrograms, and a moderate classification here is saying you believe levels can be reduced an additional 7.2 micrograms (or 85% of what has been done before) in just 6 years.

SIP documents submitted to the EPA last year stated the Valley - doing the very best it could knowing this new standard was coming - could just barely achieve the 12 microgram standard by the end of 2030. Allowing a moderate classification, an additional 3 micrograms would need to be reduced in a single year in order to achieve the 9 microgram standard by the end of 2031 or 2032 as. We all know the San Joaquin Valley cannot meet a moderate attainment date for this new standard.

Please help eliminate unnecessary work on a moderate SIP when that attainment timeline cannot be achieved and ask the EPA to immediately reclassify the San Joaquin Valley as serious nonattainment.



January 22nd, 2025

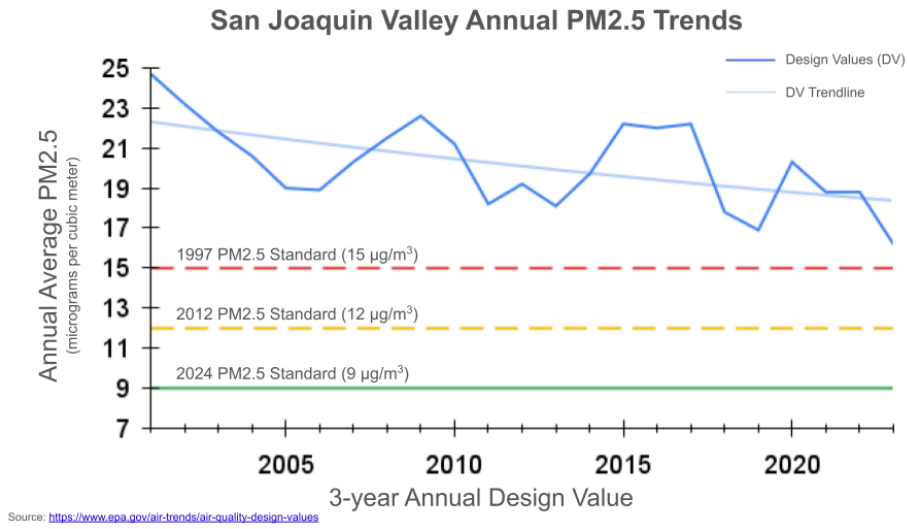
Chair Liane Randolph  
California Environmental Protection Agency  
1001 I Street, Sacramento, California 95814

**RE: Request for Serious Area Classification for the San Joaquin Valley**

Dear Chair Randolph and CARB Board Members,

The San Joaquin Valley (SJV) struggles to meet existing clean air standards. Last year, the EPA promulgated a new, more stringent 9 microgram annual standard. Normally, an area is designated as moderate, and if the area does not reach attainment by the required date, the classification is increased to serious or extreme. This process can be incredibly drawn-out, all while residents suffer from persistent air pollution. However, per Federal CFR for PM<sub>2.5</sub> NAAQS ([40 CFR Part 51, Subpart Z, 51.1002\(b\)](#)), any moderate nonattainment area can be reclassified by the EPA to Serious through notice-and-comment rulemaking. This can occur if the EPA determines that the region cannot practicably attain a particular PM<sub>2.5</sub> NAAQS by the applicable Moderate area attainment date. Since the SJV is already classified as serious nonattainment for the less stringent 1997 and 2012 PM<sub>2.5</sub> standards and has requested multiple extensions for both, we believe it makes logical sense for the EPA to classify our region as serious nonattainment as soon as possible. Therefore, we ask the CARB Governing Board to approve the legally required, state-submitted moderate nonattainment classification, but **add a request to the proposed package that asks the EPA to change the region's classification to serious nonattainment.**

Over the course of 25 years, the PM<sub>2.5</sub> State Implementation Plan (SIP) process in the San Joaquin Valley has reduced annual PM<sub>2.5</sub> design values by 8.5 micrograms per cubic meter. In agreeing with CARB staff that the SJV should be classified as moderate nonattainment, you are stating you believe Valley PM<sub>2.5</sub> design values can be reduced 7.2 micrograms per cubic meter (or 85% of previous reductions) in just 6 years, when we all know emission reductions are going to be much more difficult to obtain. The SJV has also not achieved the existing, older 1997 and 2012 PM<sub>2.5</sub> annual standards and most recently have asked for extensions of both attainment dates because they cannot meet these less stringent standards. It is not possible to say the SJV can only just barely meet the 2012 12 microgram standard by the end of 2030 and also believe they will meet the 2024 PM<sub>2.5</sub> annual standard one year later by the end of 2031.



Reclassifying the San Joaquin Valley Air Basin as serious nonattainment would significantly reduce the workload for both the SJV Air District and CARB staff by eliminating the need to produce a less stringent moderate nonattainment SIP. Both agencies would be able to immediately work on a serious nonattainment SIP which is exactly what they have been working on and will need to again if the 1997 and 2012 PM2.5 standards are not met by their current attainment dates. A serious nonattainment classification would allow the exact same work to fully comply with all three SIP requirements, streamlining the entire process and creating a more robust emission reduction plan for the SJV.

**We strongly urge the board to add a request to the proposed package that asks the EPA to change the classification to serious nonattainment given the impossibility of meeting a moderate classification timeline.**