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LAW OFFICE OF BRENT J. NEWELL

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February 10, 2025

*By Certified Mail, Return Receipt Requested*

Lee Zeldin, Administrator  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW  
Mail Code 1101A  
Washington, D.C. 20460

Cheree Peterson, Acting Regional Administrator  
U.S. Environmental Protection Agency Region 9  
75 Hawthorne Street  
Mail Code ORA-1  
San Francisco, CA 94105

**Re: Clean Air Act Notice of Intent to Sue for Failure (1) to Make an Attainment Determination for the 1997 8-Hour Ozone National Ambient Air Quality Standard; and (2) to Take Final Action on the Smog Check Revision Contingency Measure for the 1997 8-Hour Ozone Standard.**

Dear Administrator Zeldin and Acting Regional Administrator Peterson:

The Committee for a Better Arvin, Healthy Environment for All Lives, Medical Advocates for Healthy Air, and Sierra Club (collectively “Air Advocates”) give notice to the Environmental Protection Agency, Lee Zeldin, and Cheree Peterson (collectively “EPA”) of the Air Advocates’ intent to sue EPA for its failure to fulfill its mandatory duties to take final action to (1) determine whether the San Joaquin Valley attained the 1997 8-hour ozone National Ambient Air Quality Standard; and (2) approve, disapprove, or partially approve/disapprove the California Smog Check Contingency Measure State Implementation Plan Revision (hereafter “Smog Check Revision”) as it relates to the contingency measures requirement for the 1997 8-hour ozone standard in the San Joaquin Valley and the commitment by the California Resources Board to adopt attainment contingency measures in the State implementation Plan (“SIP”) codified at 40 C.F.R. 52.220(396)(ii)(A)(2)(i).

The Air Advocates send this notice pursuant to section 304(b) of the Clean Air Act (“Act”), 42 U.S.C. § 7604(b), and 40 C.F.R. §§ 54.2 and 54.3. At the conclusion of the 60-day notice period, the Air Advocates intend to file suit under section 304 of the Act, 42 U.S.C. § 7604, to prosecute EPA’s failure to perform its non-discretionary duties.

The San Joaquin Valley has “long been ‘an area with some of the worst air quality in the United States,’ and it has repeatedly failed to meet air quality standards.” *Association of Irrigated Residents v. U.S. Environmental Protection Agency*, 10 F.4th 937, 944 (9th Cir. 2021) (quoting *Committee for a Better Arvin v. EPA*, 786 F.3d 1169, 1173 (9th Cir. 2015)). California’s history of failure spans decades during which time EPA has found that the Valley has failed to attain several National Ambient Air Quality Standards by their respective deadlines.<sup>1</sup>

Ozone pollution remains a public health crisis in the San Joaquin Valley. Short-term exposure to ozone irritates lung tissue, decreases lung function, exacerbates respiratory disease such as asthma and Chronic Obstructive Pulmonary Disease (COPD), increases susceptibility to respiratory infections such as pneumonia, all of which contribute to an increased likelihood of emergency department visits and hospitalizations. Short-term exposure to ozone also increases the risk of premature death, especially among older adults. Long-term exposure to ozone causes asthma in children, decreases lung function, damages the airways, leads to development of COPD, and increases allergic responses.<sup>2</sup>

According to the American Lung Association, counties in the San Joaquin Valley air basin rank among the worst in the United States for ozone. Tulare, Kern, and Fresno counties rank as the fourth, fifth, and sixth most ozone-polluted counties, respectively.<sup>3</sup>

EPA establishes National Ambient Air Quality Standards and ensures that California adopts strategies to attain those standards by the statutory deadlines. In other words, EPA must take action to protect public health. In 1997, EPA established a standard for exposure to ozone known as the 1997 8-hour ozone standard and set the allowable limit at .080 parts per million. California voluntarily requested and the EPA reclassified the Valley from a severe ozone

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<sup>1</sup> See 66 Fed. Reg. 56476 (Nov. 8, 2001) (1-hour ozone standard failure to attain by 1999); 67 Fed. Reg. 48039 (July 23, 2002) (PM-10 standard failure to attain by 2001); 76 Fed. Reg. 82133 (December 30, 2011) (1-hour ozone standard failure to attain by 2010); 81 Fed. Reg. 84481 (November 23, 2016) (1997 24-hour and annual PM2.5 standards failure to attain by 2015); 86 Fed. Reg. 67329 (Nov. 26, 2021) (disapproving 1997 annual PM2.5 implementation plan because of failure to attain the standard by December 31, 2020).

<sup>2</sup> AMERICAN LUNG ASSOCIATION STATE OF THE AIR 2024 at 30-31, available at <https://www.lung.org/getmedia/dabac59e-963b-4e9b-bf0f-73615b07bfd8/State-of-the-Air-2024.pdf> (last visited February 10, 2025).

<sup>3</sup> *Id.*

nonattainment area to an extreme ozone nonattainment area with an attainment date of June 15, 2024. As of the date of this notice letter, EPA has not made a mandatory determination as to whether the Valley attained the standard by that date. A finding of failure to attain would trigger contingency measures to reduce ozone-forming pollution.

The California Air Resources Board (“CARB”) and the San Joaquin Valley Unified Air Pollution Control District (“District”) adopted the plan to achieve ozone pollution levels to meet the 1997 8-hour ozone standard, including CARB’s commitment to develop, adopt, and submit attainment contingency measures to EPA by 2020. The plan consists of several components. On April 30, 2007, the District adopted the 2007 Ozone Plan<sup>4</sup> and on September 27, 2007, CARB adopted the State Strategy for California’s 2007 State Implementation Plan (2007 State Strategy).<sup>5</sup> On April 24, 2009, CARB adopted the Status Report on the State Strategy for California’s 2007 State Implementation Plan and Proposed Revision to the SIP Reflecting Implementation of the 2007 State Strategy.<sup>6</sup> On July 21, 2011, CARB adopted Resolution 11-22 and the 8-Hour Ozone State Implementation Plan Revisions and Technical Revisions to the PM<sub>2.5</sub> State Implementation Plan Transportation Conformity Budgets for the South Coast and San Joaquin Valley Air Basins (“2011 Ozone SIP Revisions”).<sup>7</sup> This letter refers to these actions collectively as the 2007 Ozone Plan.

The 2007 Ozone Plan must meet several Clean Air Act requirements. While the Act leaves the actual control strategy to the discretion of the state, the state must demonstrate that the control strategy selected will ensure attainment of the standard by the applicable attainment deadline. *See* 42 U.S.C. § 7511a(c)(2)(A); *see also* 40 C.F.R. § 51.112(a) (“Each plan must demonstrate that the measures, rules, and regulations contained in it are adequate to provide for the timely attainment and maintenance of the national standard that it implements.”). This “attainment demonstration” supports a state’s claim that the adopted control measures provide sufficient emission reductions. *See Sierra Club v. EPA*, 356 F.3d 296 (D.C. Cir. 2004) (“The attainment demonstration is based on the state’s control strategy for ozone-precursor emissions.”).

Congress directs states and local agencies to formulate a steady rollout of attainment plans to ensure progress toward the goal of attaining the standard by the applicable deadline. 42 U.S.C. §§ 7501(1), 7502(c)(2), 7511a(b)(1), and 7511a(c)(2)(B). Ensuring “reasonable further progress” precludes strategies that might defer the tough choices and only impose controls at the last minute. Congress defined reasonable further progress (“RFP”) as follows:

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<sup>4</sup> 76 Fed. Reg. 57846, 57847 (Sept. 16, 2011).

<sup>5</sup> *Id.* at 57848.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

The term “reasonable further progress” means such annual incremental reductions in emissions of the relevant air pollutant as are required by this part or may reasonably be required by the Administrator for the purpose of ensuring attainment of the applicable national ambient air quality standard by the applicable date.

42 U.S.C. § 7501(1). An attainment plan must demonstrate that it will achieve RFP by showing that the emission inventory for the area continues to decline according to milestones every three years. 42 U.S.C. §§ 7511a(b)(1) and 7511a(c)(2)(B). Such demonstration must show emissions reductions of at least three percent of baseline emissions of VOC or NO<sub>x</sub> each year or less than three percent if a state demonstrates all feasible measures are in the plan. 42 U.S.C. §§ 7511a(c)(2)(B)(i), (ii); 7511a(c)(2)(C).

Congress also requires states to adopt “contingency measures” in case the attainment plan fails to attain the standard by the deadline or fails to meet Reasonable Further Progress. *See* 42 U.S.C. §§ 7502(c)(9) and 7511a(c)(9). Contingency measures triggered by a failure to attain are referred to as “attainment contingency measures.”

Such plan shall provide for the implementation of specific measures to be undertaken if the area fails to make reasonable further progress, or to attain the national primary ambient air quality standard by the attainment date applicable under this part. Such measures shall be included in the plan revision as contingency measures to take effect in any such case without further action by the State or the Administrator.

42 U.S.C. § 7502(c)(9); *see also* 42 U.S.C. § 7511a(c)(9) (repeating requirement for contingency measures for failure “to meet any applicable milestone.”). The EPA has interpreted section 172(c)(9), 42 U.S.C. § 7502(c)(9), such that “contingency emissions reductions should be approximately equal to the emissions reductions necessary to demonstrate RFP for one year.” 57 Fed. Reg. 13498, 13543-44 (April 16, 1992) (“General Preamble”).

EPA approved the 2007 Ozone Plan, including the attainment demonstration in which CARB and the District claimed that the Plan’s strategies would reduce ozone below the .080 ppm standard by the June 15, 2024 attainment date. 77 Fed. Reg. 12652, 12664, 12670 (March 1, 2012). EPA also approved CARB’s commitment to develop, adopt, and submit attainment year contingency measures by 2020 that meet the requirements of section 172(c)(9) of the Act, 42 U.S.C. § 7502(c)(9). *Id.* EPA identified the approved commitment to adopt the contingency measures in the State Implementation Plan. 40 C.F.R. § 52.220(396)(ii)(A)(2)(i).

Central California Environmental Justice Network, Committee for a Better Arvin, Medical Advocates for Healthy Air, and Healthy Environment for All Lives were the plaintiffs in *Central California Environmental Justice Network, et al. v. Randolph, et al.*, No. 2:22-cv-01714-

DJC-CKD (E.D. Cal.), a Clean Air Act citizen suit that enforced the commitment by CARB to adopt attainment contingency measures by 2020 for the 1997 8-hour ozone standard in the San Joaquin Valley. On July 21, 2023, the U.S. District Court for the Eastern District of California entered an order granting summary judgment against CARB officials and the Air District.<sup>8</sup> The Court declared that the defendants violated the Clean Air Act by failing to adopt and submit the attainment contingency measures and ordered the defendants to adopt and submit the contingency measures to the EPA by January 31, 2024. CARB adopted and submitted the Smog Check Revision “to address Clean Air Act contingency measure requirements for specified ozone and fine particulate matter nonattainment areas.”<sup>9</sup> CARB adopted the Smog Check Revision “to address Clean Air Act contingency measure requirements consistent with newly developed U.S. Environmental Protection Agency draft guidance.”<sup>10</sup> Finally, CARB adopted and submitted the Revision to allegedly satisfy the Judgment.<sup>11</sup> Other than the Smog Check Revision, the Air District has not proposed or adopted, and CARB has not submitted, any other attainment contingency measures for the 1997 8-hour ozone standard.<sup>12</sup>

EPA has approved the Smog Check Revision as a contingency measure without taking final action on whether the Revision satisfies the commitment for California to adopt and submit to EPA attainment contingency measures for the 1997 8-hour ozone standard as required by the SIP. *See* 40 C.F.R. § 52.220(396)(ii)(A)(2)(i). Nor has EPA taken final action to otherwise

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<sup>8</sup> Order Granting State Defendants’ Request for Judicial Notice; Granting Plaintiffs’ Motion for Summary Judgment; and Withholding Submission of Plaintiffs’ Motion Regarding Defendants Offer of Judgment, *Central California Environmental Justice Network v. Liane Randolph, et al.*, No. 2:22-cv-01714-DJC-CKD (E.D. Cal.). On October 16, 2023, the Court entered Judgment.

<sup>9</sup> Letter from Dr. Steven Cliff to Martha Guzman at 1, November 13, 2023, Docket ID EPA-R09-OAR-2023-0524-0010; Resolution 23-20 at 2-3 and Attachment A, Docket ID EPA-R09-OAR-2023-0524-0011.

<sup>10</sup> *Id.* On December 16, 2024, EPA published a notice stating that it had finalized the Guidance on the Preparation of State Implementation Plan Provisions that Address the Nonattainment Area Contingency Measure Requirements for Ozone and Particulate Matter. 89 Fed. Reg. 101602 (Dec. 16, 2024). EPA approved certain PM<sub>2.5</sub>-related contingency measures for the San Joaquin Valley pursuant to the interpretation as articulated in the draft version of that guidance. *See* 89 Fed. Reg. 80749 (Oct. 4, 2024). On December 2, 2024, Air Advocates challenged EPA’s rule approving the PM<sub>2.5</sub> contingency measures in *Committee for a Better Arvin v. EPA*, No. 24-7270 (9th Cir.).

<sup>11</sup> Transcript of Meeting, State of California, Air Resources Board, Item 23-9-2, October 26, 2023 at 36:3-7, Docket ID EPA-R09-OAR-2023-0524-0013; Joint Status Report at 1 (Dkt. No. 54), *Central California Environmental Justice Network v. Randolph*, No. 2:22-cv-001714-DJC-CKD (E.D. Cal.).

<sup>12</sup> Transcript of Meeting, State of California, Air Resources Board, Item 23-9-2, October 26, 2023 at 28:14 to 30:17, Docket ID EPA-R09-OAR-2023-0524-0013.

determine whether the Revision meets the Clean Air Act's contingency measures requirement. EPA explained it would defer such action:

We are not making any determination presently as to whether this individual contingency measure is sufficient by itself for CARB and the relevant air district to fully comply with the contingency measure requirements in any specific nonattainment area or specific NAAQS under CAA sections 172(c)(9) and 182(c)(9) and 40 CFR 51.1014. We will be acting on the contingency measure SIP plan elements in the relevant nonattainment plan SIP submissions for the respective areas and NAAQS in separate rulemakings, and will consider the emissions reductions associated with the Smog Check Contingency Measure at that time.

88 Fed. Reg. at 87987-87988; *see also* 89 Fed. Reg. 56222, 56229 (July 9, 2024) (final rule approving the Smog Check Revision).

EPA acknowledges that CARB submitted the Smog Check Revision as the attainment contingency measure for the 1997 8-hour ozone standard. 89 Fed. Reg. 56222, 56226 (July 9, 2024). EPA also acknowledges that it was not deciding whether the Revision satisfied CARB's commitment in the 2007 Ozone Plan codified at 40 C.F.R. § 52.220(396)(ii)(A)(2)(i) or otherwise complied with the Clean Air Act with respect to required contingency measures for the 1997 8-hour ozone standard. *Id.* at 56226-56227.

### **EPA Failure to Determine whether the San Joaquin Valley Attained the 1997 8-hour ozone National Ambient Air Quality Standard.**

EPA has failed to make a mandatory attainment determination by December 15, 2024. Effective June 4, 2010, EPA granted California's request to reclassify the San Joaquin Valley from a serious ozone nonattainment area to an extreme ozone nonattainment area for the 1997 8-hour ozone standard. 75 Fed. Reg. 24409, 24415 (May 5, 2010). In that rulemaking, EPA finalized the attainment date for an extreme ozone nonattainment area "as expeditiously as practicable, but not later than the applicable maximum attainment period set forth in 40 CFR 51.903(a), Table 1: June 15, 2024 for San Joaquin Valley[.]" *Id.* EPA also approved the 2007 Ozone Plan and its attainment demonstration which claimed the San Joaquin Valley would attain the standard by June 15, 2024. 77 Fed. Reg. at 12663 n.30, 12670.

Current design value data show that the Valley has failed to attain the 1997 8-hour ozone standard by the June 15, 2024 attainment date. EPA data show ozone design values for 2017-2019, 2018-2020, 2019-2021, 2020-2022, and 2021-2023 at .088 ppm, .093 ppm, .093 ppm, .094 ppm, and .090 ppm, respectively, well above the .084 design value necessary to attain the 1997 annual PM<sub>2.5</sub> standard.<sup>13</sup>

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<sup>13</sup> *See* 2023 Design Value Reports, Ozone Design Values, Table 3c, Design Value History in Areas Previously Designated Nonattainment for the 1997 8-Hour Ozone NAAQS, attached as Exhibit 1 and available at <https://www.epa.gov/air-trends/air-quality-design-values#report> (last visited February 10, 2025).



EPA has a mandatory duty under section 179(c)(1) of the Clean Air Act to determine whether the San Joaquin Valley either attained or failed to attain the 1997 8-hour ozone standard within six months of the June 15, 2024 attainment date, or December 15, 2024. 42 U.S.C. § 7509(c)(1). EPA's failure to perform its non-discretionary duty under sections 179(c)(1) of the Act, 42 U.S.C. § 7509(c)(1), has violated and continues to violate the Act.

**EPA Failure to Take Final Action on the Smog Check Revision as it Relates to the 1997 8-Hour Ozone Standard.**

On October 26, 2023, CARB adopted the Smog Check Revision and approved Resolution 23–20. On November 13, 2023, CARB submitted the Smog Check Revision to EPA as a revision to the California State Implementation Plan (“SIP”). EPA found the Smog Check Revision complete on December 20, 2023. 88 Fed. Reg. 87981, 87982 (December 20, 2023).

EPA shall act on the Smog Check Revision, by full or partial approval or disapproval, within twelve months of a completeness finding. 42 U.S.C. § 7410(k)(2). EPA has a non-discretionary duty to take final action to approve, disapprove, or partially approve/disapprove the Smog Check Revision no later than December 20, 2024. EPA has failed to approve, disapprove, or partially approve/disapprove the Smog Check Revision as it relates to the commitment in the 2007 Ozone Plan to adopt attainment contingency measures, codified at 40 C.F.R. § 52.220(396)(ii)(A)(2)(i), and as it relates to the Clean Air Act's requirement for contingency measures for the 1997 8-hour ozone standard. EPA's failure to perform its non-discretionary duty under section 110(k)(2) of the Act, 42 U.S.C. § 7410(k)(2), has violated and continues to violate the Act.

**Identity of the Noticing Parties and their Attorney:**

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**Conclusion**

Following the 60-day period, the Air Advocates will file suit in U.S. District Court to compel EPA to perform its nondiscretionary duties under the Clean Air Act. If you wish to discuss this matter short of litigation, please direct all future correspondence to the Air Advocates' attorney.

Sincerely,



Brent Newell

cc. Governor Gavin Newsom (By Certified Mail, Return Receipt Requested)  
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