



REGION 9 ADMINISTRATOR

SAN FRANCISCO, CA 94105

September 29, 2026

The Honorable Gavin Newsom
Governor of California
1021 O Street
Suite 9000
Sacramento, California 95814

Dear Governor Newsom:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (The EPA or the Agency) intended approach for finalizing area designations for California for the 2024 primary annual fine particulate matter (PM_{2.5}) National Ambient Air Quality Standard (NAAQS or standard).

On February 7, 2024, the EPA promulgated a revised primary annual PM_{2.5} NAAQS of 9.0 micrograms per cubic meter (µg/m³).¹ The EPA's promulgation of the NAAQS initiated the designations process in accordance with Clean Air Act (CAA) section 107, which is intended to identify areas of the country as either meeting or not meeting the NAAQS.² Under CAA section 107(d)(1)(A), the Governor of each State was required to submit a list of initial designations for all areas in their State to the EPA by February 7, 2025. The EPA received a letter dated January 28, 2025 containing the list of initial area designations for California. The State of California submitted to the EPA an initial designation of nonattainment for the San Joaquin Valley Air Basin, the South Coast Air Basin, San Francisco Bay Area Air Basin, the Yuba City-Marysville area, and the counties of Mendocino (partial), Sacramento, San Diego, Imperial (partial), and Plumas (partial). The State of California submitted to the EPA an initial designation of unclassifiable for the Great Basin Valleys Air Basin (partial), the Lake Tahoe Air Basin, the Mountain Counties Air Basin (partial), the North Coast Air Basin (partial), the Sacramento Valley Air Basin (partial), and the Salton Sea Air Basin (partial). The State of California submitted an initial area designation of attainment for the rest of the State.

¹ 89 FR 16202 (Mar. 6, 2024).

² CAA section 107(d)(1)(A)(i)–(iii) defines: (i) nonattainment, any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the NAAQS, (ii) attainment, any area (other than an area identified in clause (i)) that meets the NAAQS, or (iii) unclassifiable, any area that cannot be classified on the basis of available information as meeting or not meeting the NAAQS. The EPA uses the category of attainment/unclassifiable for an area that is meeting the NAAQS and does not contribute to ambient air quality in a nearby area that does not meet the NAAQS.

On July 17, 2026, the Northern District Court of California ordered the EPA to publish final designations for all areas of the country no later than February 6, 2027.³ The EPA is appealing that court order. On November 24, 2025, the EPA filed a motion asking the U.S. Court of Appeals for the D.C. Circuit to vacate the 2024 PM_{2.5} NAAQS thereby relieving the EPA of the obligation to make designations in furtherance of an unlawful standard. The D.C. Circuit subsequently upheld the 2024 PM_{2.5} NAAQS, but on August 28, 2026, State and industry petitioners filed two petitions with the United States Supreme Court for writ of certiorari, seeking to appeal that decision. Absent relevant action from the judiciary, the EPA intends to finalize designations for the 2024 annual PM_{2.5} NAAQS based on the most recent monitoring data (2023-2025 data) and any other relevant information available at that time. The majority of Governors' initial designations were based on 2021-2023 data. That being the case, we recognize that the EPA is evaluating two additional years of data beyond those that Governors had available at the time of their initial area designations submissions.

Our preliminary review of the 2023-2025 monitoring data indicates that your State has one or more monitors with design values that may not meet the 2024 annual PM_{2.5} NAAQS and/or that your State includes portions of a multi-State Core-Based Statistical Area or Combined Statistical Area that has one or more monitors with design values that may not meet the 2024 annual PM_{2.5} NAAQS. Without any further information or processing, such as a determination that air quality data was influenced by an exceptional event, these data could indicate that the area is not meeting the NAAQS and the area, including nearby areas that contribute to the area not meeting the NAAQS, may be designated as nonattainment.

Certain events, including prescribed fires and wildfires, have the potential to impact air quality monitoring data across many regions of the country. Based on a screening analysis using the EPA's exceptional events technical tools, there are over 9,000 site days that could be submitted as Tier 1 or Tier 2 exceptional events, potentially affecting the design value at every monitor with a current 2023-2025 design value over 9 µg/m³. In addition, several States and organizations have communicated to the EPA that the Teledyne T640 and T640x PM mass monitors, which are prevalent in the southern and eastern parts of the U.S., have a high bias and are affecting the ability to evaluate attainment of the 2024 PM_{2.5} annual standard.⁴ The EPA is working to complete an assessment of the issues raised and any

³ *All. of Nurses for Healthy Env'ts v. Zeldin*, No. 26-cv-03118-HSG.

⁴ See letter to the EPA from Enterprise Quality Management Division, titled "Request for Correction under the Information Quality Act of: (1) EPA's Approval of Four Modification Requests for the T640-T640x PM FEM Monitors; and (2) EPA's Retroactive Application of the Approved Modification of the T640 and T640X Monitors to Concentration Data for PM_{2.5} in EPA's Air Quality System (AQS)", dated January 6, 2026. Available at <https://www.epa.gov/system/files/documents/2026-01/nr3-rfc-1-6-26-c.pdf>.

See also letter to the Kansas Department of Health and Environment from The City of Kansas City, MO Office of Environmental Quality and Johnson County, KS Department of Health and Environment titled "Kansas PM_{2.5} NAAQS Designation Recommendations", dated January 28, 2025. Available at <https://www.marc.org/sites/default/files/2025-01/PM-NAAQS-Designation-Recommendation-KDHE.pdf>.

See also letter to the EPA from The Association of Air Pollution control Agencies, titled "RFC 26002 – Modification Requests for Federal Equivalent Methods (FEM) Monitors", dated March 12, 2026. Available at https://www.epa.gov/system/files/documents/2026-03/aapca-correspondence-for-rfc-26002_final_03-12-2026.pdf.

See also letter to the EPA from the Georgia Department of Natural Resources, titled "Georgia EPD Correspondence for RFC 26002 – Modification Requests for Federal Equivalent Methods (FEM) Monitors", dated April 15, 2026. Available at <https://www.epa.gov/quality/third-party-correspondence-rfc-26002>.

potential effect on the quality of the measurements. States can also request an exclusion of the monitoring data from being compared to the NAAQS if they demonstrate a high bias (*i.e.*, above 10%).⁵

Given the expedited deadline that the EPA is operating under, the Agency acknowledges that the EPA may be lacking relevant information or demonstrations that would lead to a different designation. As a result, the EPA is notifying you that the Agency may designate the aforementioned areas attainment/unclassifiable if sufficient and appropriate information is received or becomes available prior to February 6, 2027, to support such a designation. This outcome would be a modification of the State's initial area designation submitted January 28, 2025.

Further, the Agency also recognizes the difficulties associated with gathering and processing the information necessary for the designation process within such an abbreviated timeline. As a result, it is possible that the Agency would determine that areas in your State cannot be classified on the basis of available information as meeting or not meeting the NAAQS, which would result in a designation of unclassifiable for areas in your State. This outcome would be a modification of the State's initial area designation submitted January 28, 2026.

If you have additional information that you would like the EPA to consider for final designations, including information related to exceptional events, please submit it to the public docket for these designations, EPA-HQ-OAR-2024-0078, located at www.regulations.gov. If you think any modification of your recommendation is not appropriate, please also provide reasoning as to why that is the correct outcome. Submission of this information no later than November 1, 2026, will help ensure the EPA has sufficient time to take this information into account in the Agency's final designation decision. Such additional information provided to the EPA could result in a designation of attainment/unclassifiable, nonattainment, or unclassifiable.

Should you have any questions, please contact me at (212) 637-5000. Alternatively, you may have a member of your staff reach out to Anita Lee at (415) 231-4710.

Sincerely,

MICHAEL
MARTUCCI

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MICHAEL MARTUCCI
Date: 2026.09.29
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Michael Martucci
Acting Regional Administrator

cc: Steven S. Cliff, Executive Officer
California Air Resources Board

⁵ 40 CFR 58.11(e) and Appendix A to 40 CFR Part 58.

Enclosure 1:

California's Initial Area Designation Submission for the 2024 Annual PM_{2.5} NAAQS and Air Basins/Counties/CBSAs

Identified Counties	Identified CBSA	State Initial Designation Category	State Initial Designation Boundary	Does the county/air basin contain a valid monitor with a DV that may not meet the NAAQS?	Is the county/air basin part of a CBSA that has a monitor located in another State that may not meet the NAAQS?
<i>Los-Angeles-South Coast Air Basin, CA, containing:</i> Los Angeles County (partial) San Bernadino County (partial) Orange County Riverside County (partial)	Riverside-San Bernardino-Ontario, CA Los Angeles-Long Beach-Anaheim, CA	Nonattainment	<i>Los-Angeles-South Coast Air Basin, CA, containing:</i> Los Angeles County (partial) San Bernadino County (partial) Orange County Riverside County (partial)	Yes	No
<i>Portion of Imperial County, containing:</i> Imperial County (partial)	El Centro, CA	Nonattainment	<i>Portion of Imperial County, containing:</i> Imperial County (partial)	Yes	No

<i>San Joaquin Valley Air Basin, containing:</i> San Joaquin County Stanislaus County Merced County Madera County Fresno County Kings County Tulare County Kern County (partial)	Fresno, CA, Bakersfield, CA Hanford-Corcoran, CA Madera, CA Merced, CA Stockton-Lodi, CA Modesto, CA Visalia-Porterville, CA	Nonattainment	<i>San Joaquin Valley Air Basin, containing:</i> San Joaquin County Stanislaus County Merced County Madera County Fresno County Kings County Tulare County Kern County (partial)	Yes	No
<i>Portion of Plumas County, containing:</i> Plumas County (partial)	N/A	Nonattainment	<i>Portion of Plumas County, containing:</i> Plumas County (partial)	Yes	No
Sutter County Yuba County (partial)	Yuba City, CA	Nonattainment	Sutter County Yuba County (partial)	No	No
Mendocino County	Ukiah, CA	Nonattainment	Mendocino County (partial)	No	No

Sacramento County	Sacramento-Roseville-Arden-Arcade, CA	Nonattainment	Sacramento County	No	No
<i>San Francisco Bay Area Air Basin, containing:</i> Alameda County Contra Costa County Marin County Napa County San Francisco County San Mateo County Santa Clara County Solano County (partial) Sonoma County (partial)	San Francisco-Oakland-Hayward, CA, San Jose-Sunnyvale-Santa Clara, CA	Nonattainment	<i>San Francisco Bay Area Air Basin, containing:</i> Alameda County Contra Costa County Marin County Napa County San Francisco County San Mateo County Santa Clara County Solano County (partial) Sonoma County (partial)	Yes	No
San Diego County	San Diego-Carlsbad, CA	Nonattainment	San Diego County	Yes	No
<i>Great Basin Valleys Air Basin, containing:</i> Inyo County Mono County	N/A	Unclassifiable	All remaining areas in Great Basin Valleys Air Basin	No	No

<i>Lake Tahoe Air Basin, containing:</i> El Dorado County (partial), Placer County (partial)	N/A	Unclassifiable	All remaining areas in Lake Tahoe Air Basin	N/A	No
<i>Mountain Counties Air Basin,</i> Calaveras County, Plumas County (partial)	N/A	Unclassifiable	All remaining areas in Mountain Counties Air Basin (excluding Calaveras County, Nevada County, and a portion of Plumas County)	No	No
<i>North Coast Air Basin, containing:</i> Humboldt County	Eureka-Arcata-Fortuna, CA	Unclassifiable	All remaining areas in North Coast Air Basin (excluding Humboldt County and a portion of Mendocino County)	No	No
Shasta County	Redding, CA	Unclassifiable	Shasta County	No	No
<i>Sacramento Valley Air Basin, containing:</i> Butte County,	Sacramento-Roseville-Arden-Arcade, CA	Unclassifiable	All remaining areas in Sacramento County Air Basin (excluding Butte County,	No	No

Colusa County, Placer County (partial), Tehama County, Yolo County			Colusa County, Glenn County, a portion of Placer County, Sacramento County Tehama County, and Yolo County)		
<i>Salton Sea Air Basin, containing:</i> Imperial County (partial), Riverside County (partial)	Riverside-San Bernadino-Ontario, CA	Unclassifiable	Imperial County (portion)	No	No
Siskiyou County	N/A	Attainment	Siskiyou County	No	No
<i>Lake Air Basin, containing:</i> Lake County	Clearlake, CA	Attainment	Lake Air Basin, containing: Lake County	No	No
<i>Mojave Desert Air Basin, containing:</i> Kern County (partial), Los Angeles (partial), San Bernadino (partial)	Bakersfield, CA, Los Angeles-Long Beach-Anaheim, CA, Riverside-San	Attainment	<i>Mojave Desert Air Basin</i>	No	No

	Bernadino-Ontario, CA				
<i>North Central Coast Air Basin, containing:</i> Monterey County, San Benito County, Santa Cruz County	Salinas, CA, San Jose-Sunnyvale-Santa Clara, CA, Santa Cruz-Watsonville, CA	Attainment	North Central Coast Air Basin containing: Monterey County, San Benito County, Santa Cruz County	No	No
<i>Northeast Plateau Air Basin, containing:</i> Lassen County, Modoc County	N/A	Attainment	<i>Northeast Plateau Air Basin, containing:</i> <i>Lassen County,</i> <i>Modoc County</i>	N/A	No
<i>South Central Coast, containing:</i> San Luis Obispo County, Santa Barbara County, Ventura County	San Luis Obispo-Paso Robles-Arroyo Grande, CA, Santa Maria-Santa Barbara, CA Oxnard-Thousand Oaks-Ventura, CA	Attainment	<i>South Central Coast, containing:</i> San Luis Obispo County, Santa Barbara County, Ventura County	No	No

Nevada County	Truckee-Grass Valley, CA	Attainment	All remaining areas in Mountain Counties Air Basin (excluding Calaveras County, and a portion of Plumas County)	No*	No
Rest of State**	N/A	Attainment	All other counties and areas in the rest of the State.	N/A	No

* The State has one or more monitors with insufficient data to calculate a valid design value. The reasons for this may vary. The EPA is flagging these counties as an opportunity for the State to provide additional information to inform final designations.

**The EPA intends to designate the rest of the State attainment/unclassifiable.