STATE OF ARIZONA
OFFICE OF THE GOVERNOR

KATIE HOBBS
GOVERNOR

EXECUTIVE OFFICE

October 29, 2026

Submitted online and via email

Mr. Mike Martucci
Acting Regional Administrator
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

U.S. Environmental Protection Agency
EPA Docket Center
Docket ID Number: EPA-HQ-OAR-2024-0078
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: U.S. Environmental Protection Agency's Notice of Availability and Opportunity for Public Comment: "Initial Air Quality Designations for the 2024 Revised Primary Annual Fine Particle (PM2.5) National Ambient Air Quality Standards (NAAQS)" (Docket ID No. EPA-HQ-OAR-2024-0078), 91 FR 63516 (October 6, 2026)

Dear Acting Regional Administrator Martucci and EPA Docket Staff:

The State of Arizona appreciates the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA) notice of availability titled "Initial Air Quality Designations for the 2024 Revised Primary Annual Fine Particle (PM2.5) National Ambient Air Quality Standards (NAAQS)."[1]

This comment letter addresses Arizona's opposition to EPA's proposed approach for initial area designations for the 2024 primary annual PM2.5 NAAQS. Arizona understands the importance

[1] 91 Federal Register (FR) 63516 (October 6, 2026).

of strategic and targeted actions to improve air quality. Nonattainment area designations are extremely consequential to the people and the economies in those areas and come with 20+ years of air quality planning to fulfill all nonattainment and maintenance area requirements under the Clean Air Act (CAA). Given such importance and potential impact to key industries of national concern, including Arizona's semiconductor industry, EPA's intended approach to area designations is inappropriate for states with geographically large counties and/or core-based statistical areas (CBSAs) like Arizona.

In the Oct. 2, 2026 120-day letter received by Arizona, EPA stated:

"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 PM2.5 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 PM2.5 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."[2]

The Oct. 2, 2026 120-day letter for Arizona also included an enclosure in which EPA identified three Arizona counties across two Arizona CBSAs where an air quality monitor violating the 2024 primary annual PM2.5 NAAQS based on 2023-2025 air quality design values was located. Given that the letter references multi-State CSAs, CBSA, and counties, it is not clear in the letter which areas, or nearby areas, EPA is proposing to designate as part of this comment opportunity.

In the same letter, EPA identified air quality monitors violating the 2024 primary annual PM2.5 NAAQS based on 2023-2025 air quality design values in the Phoenix-Mesa-Chandler, AZ CBSA and the Nogales, AZ CBSA. The Phoenix-Mesa-Chandler, AZ CBSA encompasses all of Maricopa and Pinal counties in Arizona. Together, these two counties cover an area of approximately 14,600 square miles. This area is larger than the total area of the states of Rhode Island, Delaware, Connecticut, New Jersey, New Hampshire, Vermont, Massachusetts, Hawaii, and Maryland, individually.

Each of the five violating PM2.5 air quality monitors across Arizona has a monitoring spatial scale of "neighborhood" as identified in its corresponding annual air network plan. As described in 40 Code of Federal Regulations (CFR) Appendix D to Part 58, § 1.2(b)(3), a neighborhood-scale monitor "defines concentrations within some extended area of the city that has relatively uniform land use with dimensions in the 0.5 to 4.0 kilometers range [0.31 - 2.48 miles]." In relying solely upon CSA/CBSA boundaries for designations, EPA would be stretching the definitions of "nearby" and "significant contribution" to an inappropriate conclusion by

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[2] Letter from Michael Martucci, Acting Regional Administrator, U.S. Envtl. Prot. Agency Region 9, to Kathleen Hobbs, Governor of Ariz., Regarding EPA Intended Area Designations for the 2024 PM2.5 NAAQS (Sept. 29, 2026), https://www.epa.gov/system/files/documents/2026-10/region-9_arizona_120-day-letter_2026.pdf.

using five violating neighborhood-scale monitors to designate a combined 15,838 square miles of Arizona as nonattainment. This unwarranted expansion forces disproportionate economic and regulatory burdens on rural communities entirely disconnected from the actual source of the violating emissions.

In EPA's February 7, 2024 Initial Area Designation Memo, EPA identified that "although the CBSA or CSA is the starting point for the EPA's evaluation of contributions to a violation, the EPA does not intend it to be a presumed nonattainment area boundary."[3] Arizona agrees with this earlier sentiment from EPA that CSA/CBSA-level analyses should not be the presumed boundary for nonattainment areas and are inappropriate for a State such as Arizona.

In comparison to historic particulate matter NAAQS designations for Arizona, reliance on CSA/CBSA boundaries would be an extreme departure from the focused and tailored boundaries that EPA has historically enacted. In Arizona, EPA has never designated an entire county as nonattainment for any NAAQS, instead choosing to rely on partial-county area designations, as informed by EPA's typical Five Factor analysis.

Again, Arizona appreciates the opportunity to provide these comments on the EPA's notice of availability titled "*Initial Air Quality Designations for the 2024 Revised Primary Annual Fine Particle (PM2.5) National Ambient Air Quality Standards (NAAQS).*" Arizona requests that EPA not rely upon CSA/CBSA boundaries and conduct a more thorough analysis of the Five Factors, including consideration of the large geographic size of Arizona counties, historic particulate matter nonattainment area designations in these areas, and that EPA take into consideration economic and national security concerns when designating potential areas.

Sincerely,



Katie Hobbs
Governor
State of Arizona

Cc: Karen Peters, Director of the Arizona Department of Environmental Quality
Anita Lee, Air and Radiation Division Director, EPA Region 9

[3] *See* Initial Area Designations for the 2024 Revised Primary Annual Fine Particle National Ambient Air Quality Standard. Page 11. Feb. 7, 2024. Retrieved on Oct. 14, 2026 at https://www.epa.gov/system/files/documents/2024-02/pm-naaqs-designations-memo_2.7.2024-_-jg-signed.pdf.