



Air Resources Board



Linda S. Adams
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
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Sacramento, California 95812 • www.arb.ca.gov

Arnold Schwarzenegger
Governor

June 11, 2008

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

Dear Mr. Nastri:

The Air Resources Board (ARB) hereby submits as a revision to California's State Implementation Plan (SIP) the 2008 Owens Valley PM10 Planning Area Demonstration of Attainment State Implementation Plan (2008 Plan). We request that the U.S. Environmental Protection Agency (U.S. EPA) act expeditiously to find the 2008 SIP Revision complete, and fully approve it as an enforceable framework for actions taken to attain the PM10 national ambient air quality standard (NAAQS) in the Owens Valley.

On February 1, 2008, following a public hearing, the Great Basin Unified Air Pollution Control District (District) adopted the 2008 Plan. The 2008 Plan reflects a settlement agreement reached between the District and the City of Los Angeles (City) concerning the level of additional control needed on the Owens dry lakebed to attain the PM10 NAAQS. As part of the settlement agreement, the District agreed to revise the 2003 SIP before March 1, 2008 to incorporate the provisions of the settlement. This 2008 Plan fulfills the District's commitment and demonstrates that the NAAQS will be attained at the lakeshore by March 23, 2012. The 2008 Plan also notes the possibility that an extension to 2017 may be needed as allowed under Clean Air Act section 179(d)(3).

The 2008 Plan requires the City to implement dust control measures on an additional 13.2 square miles of the lake bed by April 1, 2010. It demonstrates that the proposed level of control will reduce emissions from the Owens lake bed by more than five percent per year from lakebed dust emissions levels in 2006, the emission inventory baseline year for this planning effort.

As a contingency measure, the 2008 Plan requires the District's Air Pollution Control Officer to assess the effectiveness of the control program at least once per year after May 10, 2010, and to require the City to implement supplemental controls if they are needed to attain and maintain compliance of the NAAQS. The settlement negotiated between the District and the City includes an opportunity for the City to appeal a determination to ARB as allowed under California Health and Safety Code section

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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42316, and requests that ARB issue its determination within 90 days. In the enclosed Executive Order, ARB has agreed to this request.

This submittal includes five paper and five electronic media copies of the materials identified as follows.

- 1) The 2008 Owens Valley PM10 Planning Area Demonstration of Attainment State Implementation Plan as adopted by the Great Basin Unified Air Pollution Control District on February 1, 2008, with appendices. District Board Order #080128-01, incorporating the terms and conditions of a Settlement Agreement entered into between the District and the City of Los Angeles, is in Chapter 8 of this document.
 - Appendix A, PM10 Monitoring Data (provided on electronic media only).
 - Appendix B, Air Quality Modeling Report (provided on electronic media only).
 - Appendix C, Public Comments on the Draft SIP and District Responses.
 - Appendix D, Environmental Findings of Fact and Mitigation Monitoring Program (provided on electronic media only).
- 2) ARB Executive Order S-08-009, adopting and submitting the 2008 Plan as a proposed revision to California's State Implementation Plan.
- 3) February 8, 2008 letter from Theodore D. Schade, Great Basin Unified Air Pollution Control Officer, transmitting the 2008 Owens Valley PM10 Planning Area Demonstration of Attainment State Implementation Plan.
- 4) Minutes of the District Board Hearing.
- 5) SIP Submittal Checklist.

This submittal also includes one paper copy and five electronic media copies of the environmental review documentation identified below.

- 1) Mitigation Monitoring Program, State Clearinghouse Number 2007021127, dated January 14, 2008.
- 2) Finding of Fact and Statement of Overriding Considerations, State Clearinghouse Number 2007021127, dated January 14, 2008.
- 3) Final Subsequent Environmental Impact Report – Three volumes, and Technical Appendices R.D. and R.E., dated January 14, 2008.

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If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Ms. Sylvia Oey, Manager, Liaison Section, Air Quality and Transportation Planning Branch, at (916) 322-8279.

Sincerely,

Original signed by

James N. Goldstene
Executive Officer

Enclosures

cc: Mr. Theodore D. Schade
Air Pollution Control Officer
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Air Resources Board

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