



## **GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT**

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April 26, 2016

Mr. Richard W. Corey  
Executive Officer  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**Re: 2016 Owens Valley PM<sub>10</sub> Planning Area Demonstration of Attainment State Implementation Plan**

Dear Mr. Corey:

On behalf of the Governing Board of the Great Basin Unified Air Pollution Control District (District), I am submitting to the California Air Resources Board (CARB) the enclosed *2016 Owens Valley PM<sub>10</sub> Planning Area Demonstration of Attainment State Implementation Plan* (2016 SIP). The 2016 SIP was approved by the District's Governing Board on April 13, 2016 and is transmitted to CARB for its consideration, approval and submission to the U.S. Environmental Protection Agency (EPA) as a revision to the Owens Valley PM<sub>10</sub> SIP under the federal Clean Air Act (CAA).

As background, the District prepared and adopted a SIP in 1998 (1998 SIP), which was approved by the EPA in 1999. After approval of the 1998 SIP, additional SIP revisions listed below were submitted that were not acted on by the EPA. The 2016 SIP supersedes these SIP revisions such that EPA action on the following is no longer required:

- 2003 Revision to the Owens Valley PM<sub>10</sub> Planning Area Demonstration of Attainment State Implementation Plan submitted to EPA on February 27, 2004.
- 2008 Owens Valley PM<sub>10</sub> Planning Area Demonstration of Attainment State Implementation Plan submitted to EPA on June 11, 2008.
- 2008 Owens Valley PM<sub>10</sub> Planning Area Demonstration of Attainment State Implementation Plan – Revised Managed Vegetation Best Available Control Measure submitted to EPA on October 5, 2011.

- 2013 Amendment to the Owens Valley PM<sub>10</sub> SIP submitted to EPA on May 5, 2014.
- 2013 Amendment to the Coso Junction PM<sub>10</sub> SIP submitted to EPA on October 17, 2014.

The 2016 SIP also reflects the terms of a court judgment. In 2011, a dispute arose between the District and the City of Los Angeles regarding the requirements of the 2008 SIP, which were resolved when the Sacramento Superior Court entered a Stipulated Judgment for the District on December 30, 2014 in the case captioned *City of Los Angeles v. California Air Resources Board, et al.*, Case No. 34-2013-80001451-CU-WM-GDS (Stipulated Judgment). Under the Stipulated Judgment, the City agreed to implement additional dust control measures on the lake bed (for a total of 48.6 square miles) by December 31, 2017. The District may also order the City to implement dust control measures on up to 4.8 additional square miles of the lake bed if needed to meet the National Ambient Air Quality Standard (NAAQS) or related state standards.

Paragraph 11 of the Stipulated Judgment required the District to revise the 2008 SIP by December 31, 2015 (later amended by agreement to April 15, 2016) to incorporate the relevant provisions of the Stipulated Judgment into a new SIP. To satisfy this requirement, a 2016 SIP was prepared by the District and adopted by the District Governing Board with the City's support at a public hearing on April 13, 2016.

On that same date, the District Governing Board adopted District Rule 433 – Control of Particulate Emission at Owens Lake that includes those portions of the Stipulated Judgment that are federally approvable. District Rule 433 constitutes an integral part of the attainment demonstration, is incorporated into the 2016 SIP and is also submitted to CARB for its approval and forwarding to EPA for inclusion in the SIP. The 2016 SIP thereby complies with the CAA's requirement that the SIP include enforceable control measures as necessary to attain the PM<sub>10</sub> NAAQS by the statutory deadline.

The 2016 SIP is the culmination of many years of hard and innovative work and opens a new chapter of cooperation in environmental protection. These efforts by the District and the City to implement dust control measures at Owens Lake will bring the Owens Valley Planning Area into attainment with the federal air quality standards for PM<sub>10</sub>. I would also like to thank CARB staff for their invaluable assistance, analysis and thoughtful comments during the preparation of the 2016 SIP.

I am happy to answer any questions you may have about this 2016 SIP submission.

Sincerely,



Phillip L. Kiddoo  
Air Pollution Control Officer

Enclosures: 2016 SIP (5 paper copies, 5 electronic copies)

cc: w/o enclosures:

California Air Resources Board

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