

Elle's Hardebeck  
Control Officer



NOV 24 1998

## GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street - Bishop, CA 93514  
(760) 872-8211 \* Fax (760) 872-6109

November 23, 1998

VIA FEDERAL EXPRESS  
OVERNIGHT DELIVERY

Michael P. Kenny  
Executive Officer  
California Air Resources Board  
2020 "L" Street, 4<sup>th</sup> Floor  
Sacramento, CA 95814

Re: 1998 Revisions to the Owens Valley PM10 Planning Area  
Demonstration of Attainment State Implementation Plan

Dear Mr. Kenny:

On behalf of the Governing Board of the Great Basin Unified Air Pollution Control District, I am transmitting to the State Air Resources Board the 1998 Revision to the Owens Valley PM10 Planning Area Attainment Demonstration State Implementation Plan for ("1998 SIP Revision") adopted by the District's Governing Board on November 16, 1998. The 1998 Revision amends the Owens Valley PM10 Planning Area Attainment Demonstration State Implementation Plan and Incorporated Board Order adopted by the District's Governing Board on July 2, 1997 and transmitted to the Air Resources Board by my letter to you of July 30, 1997. The enclosed document constitutes the District's authoritative compilation of the original Attainment Demonstration SIP, as revised by the 1998 Revision, and is referred to as the "Revised Owens Valley PM10 Planning Area Attainment Demonstration State Implementation Plan and Incorporated Board Order" ("Revised Attainment Demonstration SIP").

The Revised Attainment Demonstration SIP, in compliance with the Clean Air Act's requirement that the SIP "shall include enforceable ... control measures" as

necessary to attain the PM10 NAAQS by the statutory deadline, contains a formal District order, adopted under the authority of California Health & Safety Code Section 42316, requiring the City of Los Angeles to implement the fugitive dust control measures described in the SIP. That District order is incorporated into, and constitutes an integral part of, the Revised Attainment Demonstration SIP.

The 1998 SIP Revision was adopted after a duly-noticed and well-attended public hearing conducted in compliance with Section 110(a)(2) of the Clean Air Act and applicable federal regulations. All oral testimony was given under oath, and no limitation of any type was placed on the content or manner of presentation to the Governing Board of oral or written matter pertinent to the Board's proposed action. The Declaration of the District's Board Clerk certifying the facts showing the District's compliance with the reasonable notice and public hearing requirements for SIP adoption, and copies of the Board resolutions certifying Addendum No. 1 to the Final Environmental Impact Report and adopting the 1998 SIP Revisions are bound into the back of the Revised Attainment Demonstration SIP. When approved by the Governing Board at its January 20, 1999 meeting, the minutes of the November 16, 1998 meeting will be transmitted to you to supplement the record of proceedings of the adoption of the 1998 SIP Revisions.

In connection with its consideration of the 1998 SIP Revisions, the District, as lead agency, prepared and certified on November 16, 1998 an Addendum No. 1 to the Final Environmental Impact Report as compliant with the requirements of the California Environmental Quality Act (CEQA). The Board Resolution certifying the Addendum No. 1 to the Final EIR is bound with the Revised Attainment Demonstration SIP. Under CEQA, the State Air Resources Board is deemed a "responsible agency" which is authorized to use the Final Environmental Impact Report and the Addendum No. 1 to the Final EIR certified by the lead agency in deciding whether to take discretionary actions within the scope of the project approved by the lead agency. A complete copy of the Addendum No. 1 to the Final EIR as certified by the District's Governing Board is enclosed herewith.

The Memorandum of Agreement concluded between the City of Los Angeles and the District provides that it is a condition subsequent to the obligations of the parties under that Agreement that the Air Resources Board approve and submit to the Administrator of the United States Environmental Protection Agency the District's Revised Attainment Demonstration SIP not later than February 28, 1999. This provision is intended to assure that the USEPA will receive the SIP submittal with adequate time to review and approve the Revised Attainment Demonstration SIP before August 20, 1999, the applicable federal deadline by which USEPA must either approve the District's SIP or promulgate a Federal Implementation Plan for the

region. For that reason, we look forward to prompt approval by the Air Resources Board of the Revised Attainment Demonstration SIP.

Very truly yours,

*Ellen Hardebeck*

Ellen Hardebeck  
Air Pollution Control Officer

Enclosures: Revised Attainment Demonstration SIP (5 copies)  
Addendum No. 1 to Final EIR (1 copy)

cc: Mr. Gerald Gewe, City of Los Angeles (w/o enclosures)  
Mr. Larry Biland, USEPA (w/Revised Attainment Demonstration SIP)(5 copies)