Air Resources Board

Mary D. Nichols, Chairman
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Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

August 16, 2011

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

Dear Mr. Blumenfeld:

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 – Revised Managed Vegetation Best Available Control Measure (Revised BACM). We request that the U.S. Environmental Protection Agency (U.S. EPA) act expeditiously to find the Revised BACM complete, and fully approve it as part of an enforceable framework for actions taken to attain the PM10 national ambient air quality standard (NAAQS) in the Owens Valley.

On July 18, 2011, following a duly noticed public hearing, the Great Basin Unified Air Pollution Control District (GBUAPCD or District) adopted the Revised BACM. The Revised BACM redefines the minimum overall average vegetation coverage level as 37 percent, replacing the 50 percent minimum coverage level specified in the 2008 plan. The District determination that 37 percent coverage will achieve the 99 percent emission reduction target called for in the 2008 plan is based on substantial research and monitoring conducted on existing areas of managed vegetation. The Revised BACM also amends the 2010 PM10 Maintenance Plan and Redesignation Request for the Coso Junction Planning Area submitted to U.S. EPA on July 14, 2010, which incorporates the Owens Lake dust control plan by reference.

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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This submittal includes one paper and one electronic media copy of the materials identified as follows.

1) A letter to James N. Goldstene, Executive Officer, ARB, from Theodore D. Schade, Air Pollution Control Officer, Great Basin Unified Air Pollution Control District, dated July 25, 2011, transmitting the SIP revision as adopted by the District on July 18, 2011.

   - Affidavit of Service.
   - Appendix A, Notice of Public Hearing.
   - Appendix B, Proof and Statement of Publication.
   - Appendix C, Public Notice Mail List 2011.
   - Board Order #110718-04 Board Report with Attachments.
   - Board Order #110718-04.

2) ARB Executive Order S-11-017, adopting and submitting the Revised BACM as a proposed revision to California's SIP.

3) SIP Submittal Checklist (Note: the certified copy of the minutes of the GBUAPCD Board meeting at which the Revised BACM was adopted will be available only after these minutes are approved at the September 19, 2011 Board meeting, and will be forwarded to U.S. EPA shortly afterwards.).

In conformance with U.S. EPA guidance, the electronic media copy is an exact duplicate of the paper copy. 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, Southern California SIP Section, Air Quality and Transportation Planning Branch, at (916) 322-8279.

Sincerely,

James N. Goldstene
Executive Officer

Enclosures

cc: See next page.

cc: Mr. Theodore D. Schade
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