

(1)

Mojave Desert
Air Quality Management District



15428 Civic Drive, Suite 200, Victorville, CA 92392-2383
(619) 245-1661 Fax No. (619) 245-2699

Charles L. Fryxell
Air Pollution Control Officer

96-4-2
5/30/96

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 5/29/96
BY BOARD SECRETARY

XC: Board members
JDD MHS
JB legal
TSD

May 14, 1996

Mr. John Dunlap, III, Chairman
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Implementation of AB 421 (Olberg) of 1965

Dear Mr. Dunlap:

By this letter I am requesting a delay or a continuance of the upcoming Public Hearing regarding the creation of the Mojave Desert Air Basin and the related changes to the boundaries of Southeast Desert Air Basin and South Coast Air Basin. The hearing is currently scheduled for May 30, 1996, and the actions are being taken to implement the requirements of AB 421 (Olberg) of last year. Mr. Charles Fryxell, our APCO, has already communicated this request to Mr. James Boyd.

While I applaud the swift action on the part of the CARB staff to implement AB 421, it is necessary to ask for the delay because of a recent request to include the City of Big Bear in the new air basin; and to allow further staff work to assure that the purpose of AB 421 will be achieved by the particular action taken by the California Air Resources Board.

The purpose of AB 421 is to achieve regulatory equity for the Mojave Desert area. We believe that this can happen by setting into motion the redesignation process which will ultimately establish a regulatory scheme that is based on our true contribution and take into account the overwhelming impact of transported air pollution. This would also require a recognition that the creation of the Mojave Desert Air Basin corrects an error.

To further this purpose, we would like the CARB staff report and its recommendations to include California suggestions to U.S. EPA that would address and resolve the unfairness created by the current classification and designation of the Mojave Desert area.

The delay is also appropriate because the City of Big Bear made a request at the last month's MDAQMD Governing Board meeting to be included in the proposed Mojave Desert Air Basin. I am pleased that CARB staff is reviewing the request and working with the MDAQMD in preparing its recommendations.

City of Adelanto • Town of Apple Valley • City of Barstow • City of Hesperia • City of Needles
County of San Bernardino • City of Twentynine Palms • City of Victorville • Town of Yucca Valley

Mr. John Dunlap, III, Chairman
May 14, 1996
Page 2

If there are any questions, please feel free to call me at 619-949-1030.

Sincerely,

Mike Rothschild

MIKE ROTHSCHILD, Chairman
MDAQMD Governing Board

MR:EH:vr

May 30, 1996
California Air Resource Board

Mr Chairman and Members of the Board;

I am Ron Wilcox and I live in Big Bear Lake at 898 Andrew Lane.

There has been a request by the Big Bear Lake Chamber of Commerce to remove us from the jurisdiction of the South Coast AQMD. and to put us under the jurisdiction of the Mojave Desert AQMD. I ask you to deny that request.

Just as the waters from Big Bear Lake flow down Bear Creek canyon into the Santa Anna River Water Shed so does the cold mountain air above the lake which is also a fluid, flows down the same mountain canyon into the cities of Redlands and San Bernardino; and any pollution we have in our valley, most certainly impacts these two cities. At present we have no industries in our valley that pollutes. The City of Big Bear Lake is a tourist destination for snow skiing, hiking, fishing and water sports. The valley is completely surrounded by mountain tops except for Bear Creek canyon. The Chamber of Commerce states that we have five million tourists visits a year, which in itself creates quite a bit of pollution. YOU MUST ASK YOURSELF THIS QUESTION, why would Big Bear Lake be shopping for a less strict air district, or at least a new district that would never have the experience or the personnel that the South Coast AQMD. has. Could the answer to that question be that some people in Big Bear Valley have something up their sleeve that they are not telling you about? I believe the answer is an unequivocal yes. The several communities in Big Bear Valley have formed a common sewer district with the acronym BBARWA. We have a problem in our area just as most areas in California have of getting rid of our trash and sewer sludge. Some of our local politicians in Big Bear Lake have come up with the idea of building an incinerator to burn the trash and sewer sludge and sending it all up to heaven. I made the mistake of writing a letter to our local paper explaining to them that the South Coast AQMD. was squarely between their smoke stack and the heavens because incinerators are infamously dirty. Inclosed is a copy of that letter to the Editor of the Bear Valley Voice dated 11/17/95. I believe this is the only reason that they are shopping for less strict rules. I strongly urge you to DENY their request to take Big Bear Valley out of the South Coast AQMD.

The Chamber of Commerce's letter to you of March 19, 1996 has other disparities as well. They state in the first sentence, that they represent 520 businesses. They must be mistaken because their paper, Bear Valley Business Review, which I received in May-1996, shows a membership of 140 business and other organizations. I wonder how much information in that letter to you was real or hype? I again ask you to deny the request to take Big Bear Valley out of the South Coast AQMD.

These written comments are in addition to the remarks I will present at the Public Forum.

Ron Wilcox

Ron Wilcox
P.O. Box 1573
Big Bear Lake, Ca. 92315

Copy

Letter To The Editor,

There are no perpetual motion machines, just as there are no free lunches. Our appointed representatives to BBARWA haven't learnt that yet, with the exception of Stew Hanson who always knew that and almost always has proven documentation for the positions he takes.

I operated and managed power plants for much of my life, until I retired several months ago.

I was encouraged when a feasibility study was done and our representatives were told that human waste to energy would not be cost effective. End of story period. I bet you wished; its the altitude up here or something, but they have voted to squander 60,000 dollars for more studies or whatever. If you think we paid too much for the water company, that steam plant turkey will pick your wallet clean.

Now for a few facts; to burn this human fecal waste it has to be processed, steam dried, burned in a boiler to make steam to turn a steam turbine to turn an electric generator to feed ~~a~~ grid to power your home. The only problem is it will hardly produce enough power to run the steam plant. But you say other steam plants work, why not this plant? The answer is, of course, in the type of fuel used. The human waste has 5000 BTUs per pound. A good grade of coal can have 14,000 BTUs per pound. Fuel oil, such as number one diesel oil, can have 20,000 BTUs per pound. This concentrated BTU content facilitates efficient boiler design verses bulky low BTU rates. But you say at least we have burnt the stuff and its all gone up to the heavens in smoke and we won't have to haul it away. Wrong on two counts. First just a little under 50% won't burn and you still have to haul it to the dump. Second the S.C.A.Q.M.D. is squarely between your smoke stack and the heavens, thank God. If they didn't exist, instead of 15-20 days a year that the smog comes rolling into our valley it might be a 100 or more. What I am saying is, it's almost impossible to get a permit from them, to burn anything but natural gas or propane. They will let you use a stand by fuel for emergency use, that is similar to premium diesel fuel, that has additives in it and cost on an average \$2.75 per gallon. There are numerous other, almost prohibited cost. Boilers are very expensive and are best, when they are designed for one specific fuel. Since we produce about 100 tons of fecal waste and 100 tons of house hold waste per day, you should have two boilers as each fuel mentioned, has different burning characteristics. Because of the relatively small amounts of fuel material, natural gas would almost certainly have to be used. In fact it would be the primary fuel. I doubt if our Gas Company has a transmission line large enough to provide a power plant, as well as the rest of the valley. You will have to have two steam turbines and their cost make boilers look cheap. Turbines are critical to operate, should the steam temperature drop slightly and minute droplets form in the steam, it has the same effect as sand blasting the roter. You can easily incur a two million dollar over haul. Labor is expensive, as you should have licensed personnel.

Copy

To sell your electricity, you will need to guarantee that you will provide X number of kilowatts on a reliable bases. Power generation is not a hit or miss situation and this is best left to the PG&E and the Edisons' of the world.

Deregulation in the utilities is just now starting to take effect. Electric power can be bought for the cheapest price from any where on the North American Continent, even as far away as British Columbia or Quebec. It can be transferred over the power grid. Because of deregulation you will see some high cost municipal power plants closed.

I guarantee this Power Plant will cost between 20 and 40 Million Dollars and will be a white elephant. If you really have to have this white elephant I believe I can get you one for free. Los Angeles County built one at a cost of 166 Million Dollars, it's a beautiful plant, Hollywood even used it for a movie set. The only problem with this boondoggle is it cannot produce enough power to run itself. If you think this is a fairy tale, go down the hill and visit this plant in the City of Carson. The only cost will be 2-4 Million Dollars to tear it down and transport it up here and 8 Million Dollars to rebuild it. Maybe we can use R.D.A. funds, it sounds like THE appropriate type of project for R.D.A. Anybody remember the Taj?

RON WILCOX

46-4-2
5/30/96STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 5/29/96
BY BOARD SECRETARYXC: Board member
JDD MHS
JB legal
TDD

DOCUFRMTISEDBDLZJ

- 1 -

[1] Mr. Rich Bradley, Chief, Air Quality Data Branch,
[2] California Air Resources Board, Sacramento, CA.
[3] (916) 322-6076 [FAX 327-85241.

[4]
[5] From John S. Billheimer,
[6] 1332 Tiger Tail Dr., Riverside, CA 92506.
[7] (909) 780-1159 [FAX 780-32371.

[8]
[9]
[10] (1) Having been concerned for
[11] over 3 years beginning
[12] with the Coachella Valley
[13] over the misapplication of
[14] the 'Banning Station' as
[15] attainment indicator for the
[16] entire Sedab, I am very en-
[17] couraged by your current
[18] activity in the matter, and
[19] consider the realignment and
[20] redesignation of the SEDAB
[21] Basin Boundary as a primary
[22] issue. I realize that it is
[23] a daunting task to represent
[24] all of California in a manage-
[25] able number of meaningful air
[26] basins, but a few miles on the
[27] ground can mean a great deal
[28] to the permit holders affected.
[29]
[30] (2) This has also led to the
[31] examination of the in-
[32] equity of a 'Basin' boundary
[33] being located far down slope
[34] almost to the Desert floor to
[35] represent the north side of
[36] the so-called 'South Coast'
[37] air basin in the San Bernar-
[38] dino Mountains, and Big Bear
[39] in particular.
[40]
[41] (3) That is, the present
[42] Coastal Basin boundary
[43] in this vicinity approximates
[44] the northern boundary of the
[45] National Forest at about
[46] T3N:T2N, and is character-
[47] ized by the Sanitation Plant
[48] which is about 1000 ft. below
[49] the lake level and surrounding
[50] community. This is hardly a
[51] 'ridge line' concept as proxy
[52] for the imaginary 'meteorol-
[53] ogy' boundary.
[54]
[55] (4) A more southerly boundary
[56] such as discussed by Mac
[57] Iver might approximate Mt.
[58] San Geronio in the East near
[59] Big Bear to Strawberry Peak in
[60] the West near Lake Arrowhead.
[61] This is symbolically repre-
[62] sented by the spectacular
[63] tourist attraction: Rim-of-
[64] the-World-Drive.
[65]
[66] (5) I am currently reviewing
[67] the transport/modeling
[68] in SCAQMD's 1994 AQMP 'Ozone
[69] Modeling Tech. Report V-B,
[70] but concerned that I may not
[71] have time to finish it before
[72] your scheduled May 30 hearing
[73] at Sacramento.
[74]
[75] (6) The specifics of the
[76] Big Bear issue must not
[77] compromise the prime objec-
[78] tives of AB 421, but it is
[79] hoped this matter can be
[80] examined while the Desert
[81] air basin boundaries are
[82] 'on the table'.
[83]
[84] (7) I regret that I will be
[85] unable to attend the
[86] scheduled meeting, but hope
[87] the attached material will
[88] be relevant.
[89]
[90] Sincerely yours,
[91]
[92] John S. Billheimer
[93] (909) 780-1159.

FAX TO RICH BRADLEY (916) 327-8524

DOCUFRMT (SEDEBOLY)

- 1 -

[1] Governing Board of the California Air Resources Board,
 [2] John Dunlap, Chairman, James Boyd, Executive Officer,
 [3] Attn. Rich Bradley, Chief, Air Quality Data Branch,
 [4] Terry McGuire, Chief, Technical Support Div.,
 [5] David Ipps, Tech. Support Div.
 [6] Re: Proposed Amendments to Divide Southeast Desert
 [7] Air Basin and to Modify the Boundary of the
 [8] South Coast Air Basin Ire: Banning Air Qual. Mon. Sta. 1.

[9] Supplementary Information regarding Big Bear Lake,
 [10] Arrowhead/Crestline Area, and the Transport Interaction
 [11] Between South Coast and Mohave Desert Air Basins.

[18] (1) Having been concerned [4] (4) Actual examination of
 [19] for over 3 years about [5] topography and wind flows
 [20] the misapplication of the [6] would suggest that the true
 [21] 'Banning Station' as attain- [7] 'ridge line' in this area
 [22] ment indicator for the entire [8] would be nearer to Mt. San
 [23] SEDAB, I am very encouraged [9] Gorgonio south of Big Bear
 [24] by your current activity in [10] Lake and Snow Summit Ski
 [25] the matter, and consider the [11] Resort on the east, and
 [26] realignment and redesignation [12] Strawberry Peak and 'Rim-of-
 [27] of the SEDAB basin boundary [13] the-World-Highway' near
 [28] as a primary issue. [14] Lake Arrowhead on the west
 [29] [15] to form the south bound of
 [30] (2) I am also interested [16] the Crestline/Arrowhead area.
 [31] in the inequity of a [17]
 [32] 'Basin' boundary for South [18] (5) It is noted that hydro-
 [33] Coast to Mohave being on the [19] lytic boundaries (drain-
 [34] north slope of the San Ber- [20] age flows) are a useful tool
 [35] nardino Mountains almost at [21] in defining 'air basins', and
 [36] the desert floor (practically [22] effective in a macro sense.
 [37] thru the Big Bear Sanitation [23] It is observed however that
 [38] Works 1000 ft. below the Lake [24] strict adherence to this prin-
 [39] level) instead of attempting [25] ciple would split the Big Bear
 [40] to define the real ridge line [26] 'micro-basin' between Baldwin
 [41] as it would affect transport [27] Lake draining to the north to-
 [42] and air flows. [28] wards the Mohave Basin, while
 [43] [29] Big Bear Lake proper drains
 [44] (3) This boundary was of [30] thru a cleft in the mountains
 [45] of little concern when [31] southward into the Santa Ana
 [46] air pollution was looking at [32] watershed and ultimately the
 [47] 'major' sources, but with [33] South Coast valley floor.
 [48] air quality strategy taking [34]
 [49] note even of infra-structure [35] (6) Following this same prin-
 [50] gas stations, restaurants, [36] ciple of strict hydro-
 [51] dry cleaners, etc., the proper [37] lytic definition of 'air
 [52] placement of the Mountain [38] basins', Lake Arrowhead, which
 [53] Communities with respect to [39] likewise is classed as in the
 [54] air basins is a matter of [40] 'South Coast' Air Basin by
 [55] local concern. [41] the use of the Forest Service

DOCUFRMT (55)

JSB 05-23-1996

DOCUFMT (SEDBDLY)

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[94] boundary as the proximate
[95] Air Basin boundary, drains
[96] exclusively into Silverwood
[97] Lake, which virtually strad-
[98] dles the present so-called
[99] 'basin' boundary, and thence
[100] flows into the Mohave River
[101] itself.

[102]
[103] (7) It is therefore con-
[104] cluded that on strict
[105] hydrolytic principle, Lake
[106] Arrowhead MUST be in the
[107] Mohave Desert Air Basin,
[108] while Big Bear Lake would be
[109] in the South Coast Air Basin
[110] whereas the contiguous Baldwin
[111] Lake would be in the Mohave
[112] Desert Air Basin. This would
[113] of course be a ridiculous con-
[114] clusion and deny all knowledge
[115] of air flows in mountain ridge
[116] area. Thereflow hydrolytic
[117] would be a clue, but meteoro-
[118] logical patterns should be de-
[119] cisive in setting 'air basin'
[120] boundaries.

[121]
[122] (8) But hydrolytic patterns
[123] are the same all year
[124] (if it rains), while meteoro-
[125] logical patterns change with
[126] the season, or even daily or
[127] hourly. Hydrolytic boundaries
[128] can be firm and legal, while
[129] meteorological boundaries--
[130] the true air flow pattern--
[131] are shifting and kaleido-
[132] scopic and event oriented:
[133] totally unsuited as a basis
[134] for legal definition.
[135] Hydrolytic boundaries
[136] may thus be meaningless
[137] but they are legal and
[138] enforceable. This is the
[139] dilemma in this issue.

DOCUFMT (45)

[9] If meteorological pat-
[10] terns are to be decisive
[11] in setting air basins, then
[12] distinction must be made
[13] between 'affected by' and
[14] 'affecting' air quality in
[15] a basin. There is no doubt
[16] that transport from the
[17] 'Coastal Basin' as essentially
[18] composed of the 'Los Angeles
[19] Metropolitan Industrial and
[20] Urban Area' affects the Moun-
[21] tain Communities of Arrowhead
[22] and Big Bear, as it affects
[23] all the fringe sites of the
[24] SEDAB from Palm Springs to
[25] Hesperia/Phelan to Palmdale.

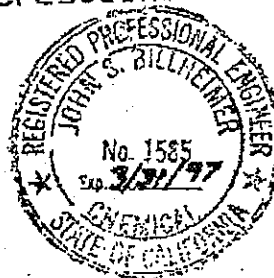
[10] It is universally conceded
[11] that emission sources in
[12] the cited SEDAB fringe loca-
[13] tions accrue to the air qua-
[14] lity of the SEDAB to which
[15] they are properly assigned,
[16] and should be controlled by
[17] whatever entity is responsible
[18] for that part of the SEDAB.
[19] This is a given, even when it
[20] is recognized that their own
[21] individual air pollution con-
[22] tribution is 'overwhelmed' by
[23] transport from an adjacent
[24] air basin over which they
[25] have no control.

[11] That is, the status of
[12] the fringe sources is that of
[13] a recipient without recourse,
[14] and with recognition that
[15] their action with respect to
[16] their indigenous emissions
[17] would have no effect on the
[18] donor basin. That is, there
[19] is no significant recircula-
[20] tion, and they bear no respon-
[21] sibility for attainment of

JSB 05-23-1996

(14) It is therefore recommended that as far as technical attributes of air

basin assignment are concerned the Air Resources Board proceed with dispatch in implementing the primary intentions of the Olberg Bill AB 421, and additionally take advantage of the present attention to the Desert Air Basin boundaries, to add the Big Bear area to the subject desert basin, 'taking under advisement' the similar but more ambiguous issue of qualification of the Crestline/Arrowhead area for desert basin inclusion.



J. S. Billheimer
P.E. (CHS) 1585
(909) 780-1159.

cc. Russell Carlson, City Manager,
Big Bear Lake (909) 866-5831
Rosie Hinojos, Chamber Commerce
Big Bear Lake (909) 866-4607
Eldon Heaston, Deputy Exec. Off.,
Mohave Desert AQMD (619) 245-5040
Larry Rhinehardt, Gov't. Affairs,
South Coast AQMD (909) 396-2898
Bob Colven, Director, Big Bear
Com. Services Dist. (909) 585-2565
Douglas Mac Iver, Geog Consultant
Big Bear Lake (909) 866-2558
Barbara Reardon, San Bernardino
Co. Brd. Supervisors (909) 387-4855
Leonard Paulitz, Member of Board
'Cities San Bernardino County'
South Coast AQMD (909) 626-8570
Brett Granlund, Assemblyman 65th
State Cap. Rm. 2137 (916) 445-7552
Keith Olberg, Assemblyman 34th,
State Cap. Rm. 4102 (916) 445-8102



96-4-2
5/30/96

May 22, 1996

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 5/24/96
BY BOARD SECRETARY

XC: Board members
JDD MHS
JB legal
TSD

Air Resources Board
P.O.Box 2815
Sacramento, Ca 95812

Attn: Rich Bradley

Dear Mr. Bradley:

Per our recent phone conversation, I am faxing to you this letter which also includes a map which will serve as proof that the boundary (hydrologic) which you are using to define the Westerly boundary of the Mojave district is drawn incorrectly. This boundary should be just West of Chiriaco Summit according to the elevations on the topo map. The Summit is 1742 and the surrounding area slopes on either side, on the West to below sea level and on the East to a couple hundred feet.

As an added concern the prevailing winds are from the West and any generations of dust and particles would affect the Chuckwalla rather than the Colorado River Basin.

With the above mentioned, it is our desire, we of the Chiriaco area to be placed in the Mojave District rather than the district we are in at present. We feel our inclusion in the Mojave district is consistent with the hydrologic perimeters as outlined by your staff; we just need to have the hydrologic lines corrected to reflect the true hydrologic boundaries.

Please contact me at 619 227 3227 for further information. And please enter this letter into the meeting scheduled for May 30, 1996.

Sincerely,

Margit C. Rusche
Margit Chiriaco Rusche

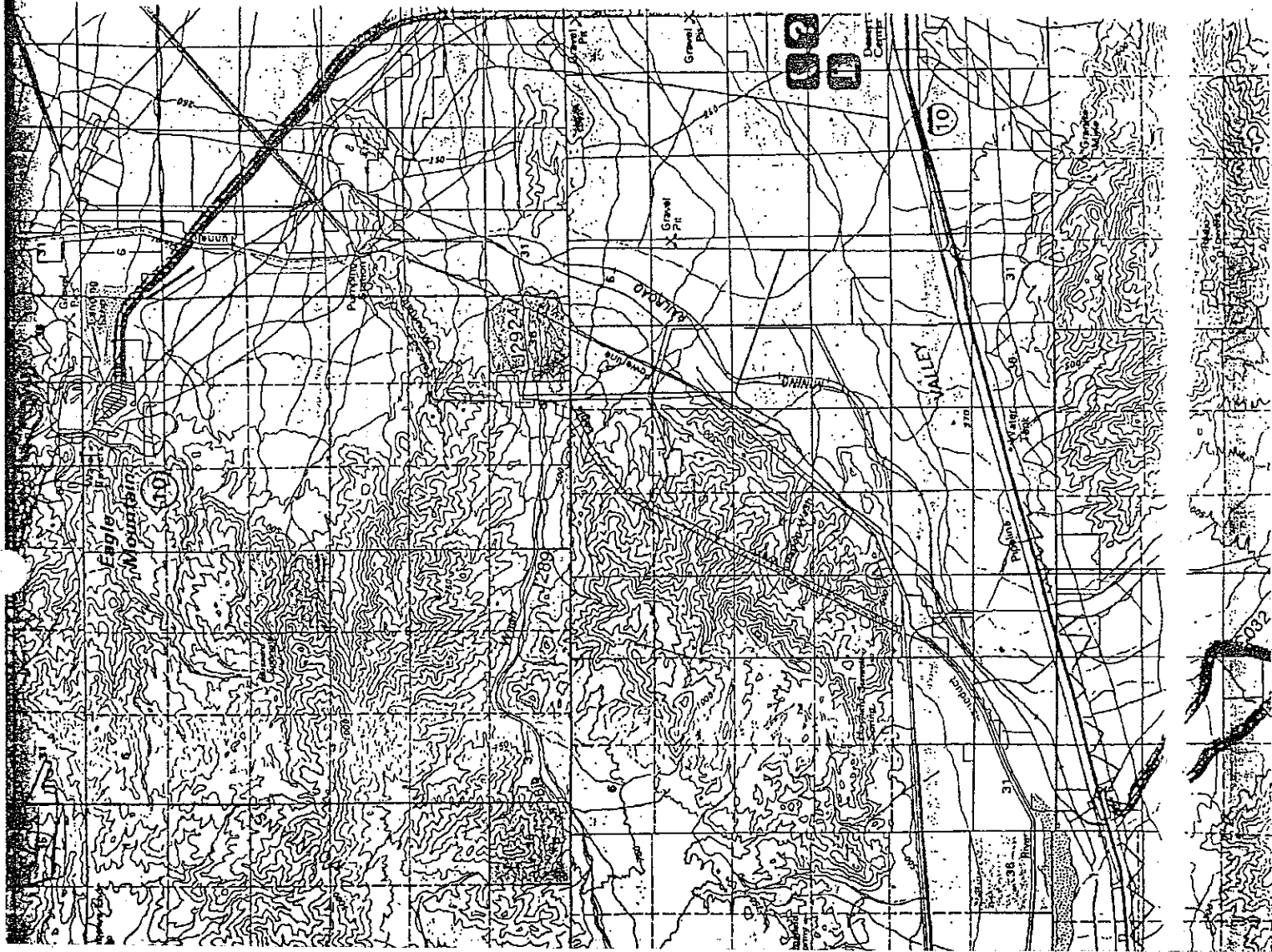


Joseph L. Chiriaco, Inc.

Established 1933

One Chiriaco Road, Chiriaco Summit, CA 92201 - (619) 227-3227
LOCATED ON INTERSTATE HWY-10 • 30 MILES EAST OF INDIO • 58 MILES WEST OF BLYTHE





MAY 16 1996

Mojave Desert Air Quality Management District



15428 Civic Drive, Suite 200, Victorville, CA 92392-2383
(619) 245-1661 Fax No. (619) 245-2699

Charles L. Fryxell
Air Pollution Control Officer

May 10, 1996

96-4-2
5/30/96

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 5/24/96
BY BOARD SECRETARY

XC: Board Members
JDD MHS
JB Legal
TSD

Mr. James D. Boyd, Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: STAFF COMMENTS TO PROPOSED AMENDMENTS TO DIVIDE THE SOUTHEAST DESERT AIR BASIN/MODIFY THE BOUNDARY OF THE SOUTH COAST AIR BASIN AND AMENDMENTS TO THE RELATED AGRICULTURAL BURNING REGULATION AND REQUEST FOR CONTINUANCE OF PUBLIC HEARING

Dear Mr. Boyd:

The Mojave Desert Air Quality Management District (MDAQMD) appreciates the opportunity to provide input to the proposed changes to the Southeast Desert Air Basin boundaries and the consequent establishment of boundaries for the new Mojave Desert Air Basin (MDAB). MDAQMD is also grateful for the assistance California Air Resources Board (CARB) staff has provided thus far in effecting these much needed changes, and concurs with most of the proposed modifications. Nevertheless, due to the existence of two outstanding issues which decidedly impact the District's future direction, MDAQMD requests that the Public Hearing scheduled for May 30, 1996 be continued, pending resolution of these matters.

The first issue concerns the request by Big Bear Lake for inclusion of Big Bear Lake in the MDAB. Assembly Bill 421 (AB 421), which precipitated the proposed boundary changes, stipulates that the MDAB "shall have a territory that is based upon similar meteorological and geographical conditions...." Community officials have pointed out its shared similarities with other high desert communities - namely elevation, population, lack of severe inversion layers and geographical location downwind from the South Coast Air Basin (SCAB) - MDAQMD is considering the request to group Big Bear with the high desert communities within the new MDAB. Therefore, MDAQMD requests that CARB study the basis for this request further, prior to establishing the final MDAB boundaries.

The second issue pertains to the proposed amendments' lack of text reflecting the legislative intent behind AB 421. AB 421 was intended to remedy a problem created by operation of federal law, which classified the Mojave Desert area as "Severe-17" for nonattainment of federal ozone standards. As you are aware, the same area is classified "Moderate" under state requirements. The state uses data from within a district to classify an area, while the federal government uses data from within an air basin. Consequently, USEPA used the higher readings from Banning - an area within the same air basin but not within the MDAQMD - to classify the Mojave Desert area.

City of Adelanto • Town of Apple Valley • City of Barstow • City of Hesperia • City of Needles
County of San Bernardino • City of Twentynine Palms • City of Victorville • Town of Yucca Valley

Mr. James D. Boyd, Executive Officer

May 10, 1996

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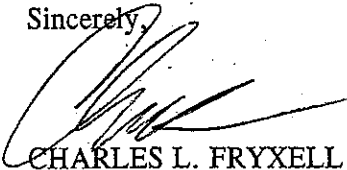
Based on geographical and meteorological conditions, MDAQMD has concluded that sources within the District are incapable of contributing to the 0.24 design value recorded at Banning. Moreover, using the Banning readings to classify MDAQMD is inconsistent with 42 U.S.C. §107(d)(4)(A)(v), FCAA §107(d)(4)(v) which stipulates that a portion of a metropolitan statistical area or consolidated metropolitan statistical area may be excluded from a nonattainment area, if it can be demonstrated that sources within that portion do not contribute significantly to violation of the National Ambient Air Quality Standards. CARB's removal of the San Geronio Pass from the MDAB's boundaries represents a positive step toward rectifying the inappropriate use of Banning readings to classify the MDAQMD. With the imminent exclusion of Banning from the MDAB, the MDAQMD Governing Board has made it clear that a reassessment of the District's designation classification is warranted and consistent with fulfilling the intent of AB 421.

Furthermore, CARB and MDAQMD both recognize that monitored ozone readings within the MDAQMD are overwhelmingly impacted by transported ozone from the SCAB. As demonstrated by the Urban Airshed model prepared by SCAQMD, MDAQMD's attainment of state and federal ozone standards is dependent on SCAQMD's control efforts to significantly reduce air pollutants transport from the SCAB.

The MDAQMD Governing Board sponsored AB 421 after discussions with staff from the U.S. Environmental Protection Agency who, at that time, concurred that a redrawing of air basin boundaries was a better approach to addressing the intrastate transport redesignation issue than seeking a change in federal law. While the proposed amendments represent an important stride toward achieving regulatory equity for the high desert, they do not adequately address the full intent of the legislation: to set in motion the redesignation process which will ultimately allow the MDAQMD to be classified based on readings obtained from within the region, which take into account the overwhelming effects of transport from the SCAB.

In conclusion, MDAQMD respectfully requests a continuation of the Public Hearing, pending resolution of the Big Bear Lake and redesignation issues. Thank you for your cooperation and consideration of this request. Should you have any questions, please contact me at (619) 245-5003

Sincerely,



CHARLES L. FRYXELL
Air Pollution Control Officer

CLF:EH:vr

cc: Rich Bradley, CARB
Lynn Terry, CARB