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2/22/79³ CALENDAR ITEM
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W 9716
Burnett

CERTIFICATION OF NEGATIVE DECLARATION FOR PERMIT
TO PROSPECT FOR GEOTHERMAL RESOURCES

APPLICANT: Kerr-McGee Chemical Corporation
Kerr-McGee Building
Okalahoma City, Okalahoma 73102

LOCATION: Section 16, T24S, R43E, MDM, Searles Valley,
Inyo County.

ACREAGE: 640 acres.

SURFACE OWNER: State of California.

PREREQUISITE ITEMS:

- A. Statutory filing fee, permit fee and expense deposits have been submitted by the applicant.
- B. Land has not been selected by the Commission for lease by competitive public bid.

OTHER PERTINENT INFORMATION:

The applicant proposes to prospect for geothermal resources by surface means as well as by the drilling of up 2 exploratory wells. The permit, if issued, will state that the permittee is limited to two 2 such wells.

The State-owned parcels, located on the floor of Searless Valley, is surrounded by federal parcels on which noncompetitive leases were issued to Kerr-McGee in December 1976. The Searless Valley Environmental Analysis Record was prepared for issuance of these leases by the United States Bureau of Land Management. The only indication of geothermal activity in this portion of Searles Valley is the presence of warm water in a nearby water well.

Because of recently enacted legislation, changing the procedures for exploring and developing geothermal resources on State-owned lands, the Commission's regulations are

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being revised to reflect the new changes in regulations and approved by the Commission. It is proposed to recommend issuance of a prospecting permit on this parcel.

ENVIRONMENTAL IMPACT:

The State Lands Commission's staff, in accordance with Article 10, Section 2906(b) of the Cal. Adm. Code, has conducted an initial study and has concluded that the project will not have a significant effect on the environment. Therefore, in compliance with subsection(c) of Section 2906, a mitigated negative declaration was prepared and filed with the State Clearinghouse.

In accordance with Chapter 1200, Statutes of 1977, the State Lands Commission must complete and certify a negative declaration within 105 days following receipt of a completed application and approve or deny the project within 1 year. This application was certified complete as of December 2, 1978.

EXHIBITS: A. Location Map. B. Negative Declaration.

IS IS RECOMMENDED THAT THE COMMISSION:

1. DETERMINE THAT AN EIR HAS NOT BEEN PREPARED FOR THIS PROJECT BUT THAT A NEGATIVE DECLARATION HAS BEEN PREPARED BY THE COMMISSION'S STAFF FOLLOWING EVALUATION OF COMMENTS AND CONSULTATION WITH PUBLIC AGENCIES WHICH WILL ISSUE APPROVALS FOR THE PROJECT.
2. CERTIFY THAT THE COMMISSION HAS REVIEWED AND CONSIDERED THE INFORMATION CONTAINED IN NEGATIVE DECLARATION NO. 237.
3. DETERMINE THAT THE PROJECT WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.

EXHIBIT "A"
 W 9716
 STATE LANDS COMMISSION

Application for Prospecting Permit
 by
 Kerr-McGee Chemical Corporation
 Section 16, T.24S., R.43E.
 Inyo County

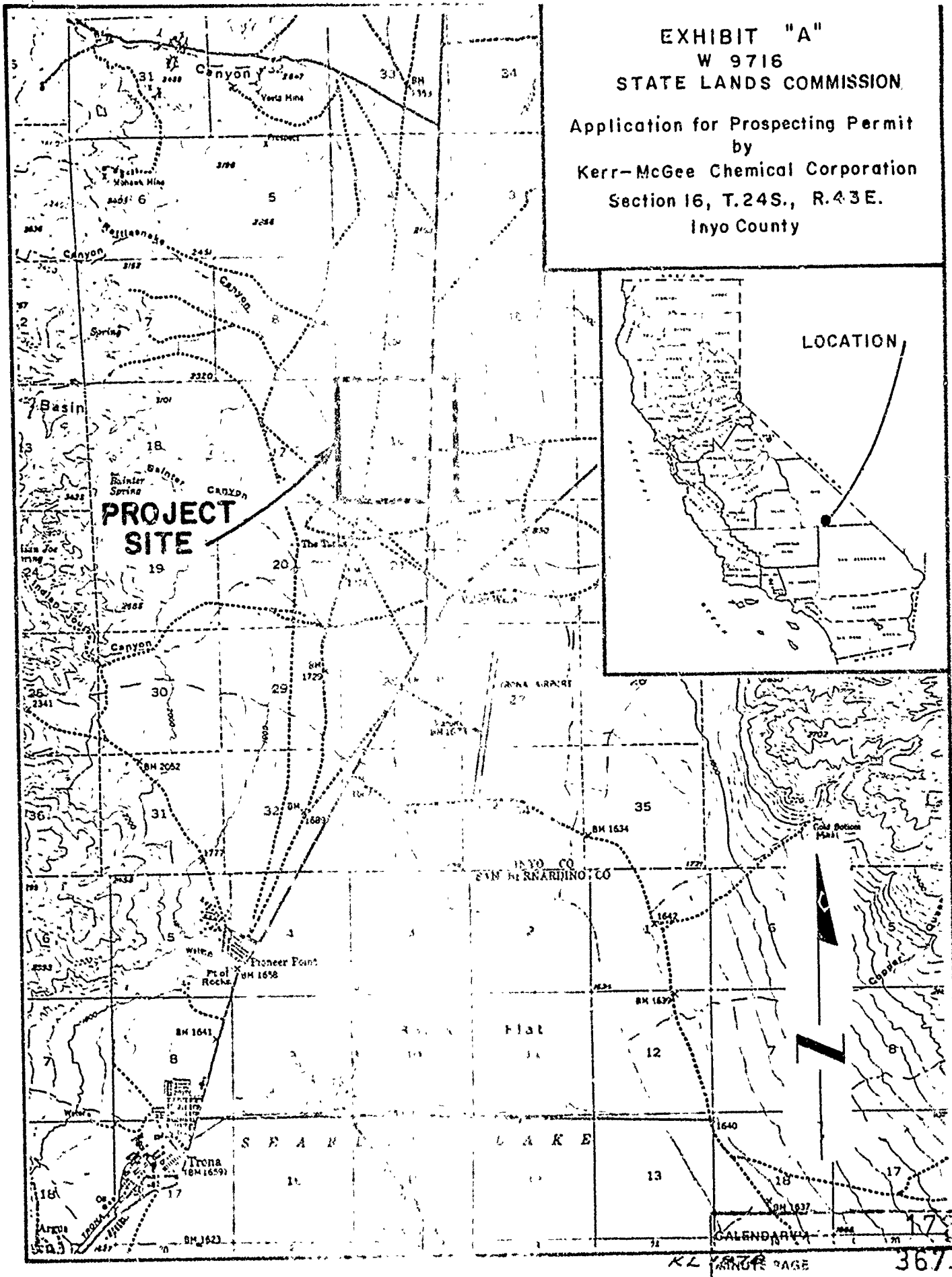


EXHIBIT "B"

NEGATIVE DECLARATION

Kerr-McGee Chemical Corporation

W 9716

This Negative Declaration is prepared pursuant to Section 15083, California Administrative Code, Title 14, Division 6 and is based upon an Initial Study pursuant to Sections 15080 and 15066 thereof.

The proposed project is the issuance of a permit to prospect for geothermal resources by surface means as well as the drilling of up to two (2) exploratory wells. The project lands are described as follows:

Section 16, T. 24 S., R 43 E., M.D.M., Inyo County, Ca.; containing 640 acres more or less.

If geothermal resources are discovered in commercial quantities, the Commission may issue a lease. The applicant has been informed, and agrees, that before any lease is issued, an environmental impact report covering the impacts of the activities of such a production lease will have to be prepared and approved.

Based on the Initial Study, prepared by the Bakersfield District Office, U. S. Bureau of Land Management and titled SEARLES VALLEY ENVIRONMENTAL ANALYSIS RECORD (SCH #76051169), which was reviewed and analyzed by the State Lands Division, the Commission has determined the project will not have a significant effect on the environment for the following reasons:

1. There will be no significant growth inducing impact, inefficient energy consumption, air and water pollution, or solid waste management problems created as a result of implementation of this project.
2. There will be minimal impacts upon fish and wildlife. Potential impacts to fish and wildlife and wildlife habitat identified by the Department of Fish and Game during early consultation will be monitored through requirements to be made a part of the permit. See comments and responses in the Initial Study Summary.
3. The implementation of this project will not narrow the range of beneficial uses of the environment or pose long-term risks to health or safety.

The Initial Study prepared by the Bureau of Land Management together with comments is available for inspection at the Sacramento office of the Division, at 1807 13th Street, and at the Long Beach office, 100 Ocean Gate, Suite 300. A summary of the Initial Study, including a project location map, is attached to this Negative Declaration.

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SUMMARY

SEARLES VALLEY ENVIRONMENTAL ANALYSIS RECORD

The State Lands Division has an application from Kerr-McGee Chemical Corporation of Trona, Inyo County, for a permit to prospect for geothermal resources on approximately 640 acres in Searles Valley, Inyo County.

The proposed project is located in approximately the center of the study area covered by the Searles Valley Environmental Analysis Record prepared by the Bakersfield District Office of the U. S. Bureau of Land Management (SCH 76051169). The State-owned parcel is surrounded by Federal non-competitive leases which were issued to Kerr-McGee on the basis of environmental data contained in the Searles Valley EAR.

Kerr-McGee operates two chemical processing plants in Searles Valley several miles south of the study area in Trona and Westend. They process brine pumped from beneath Searles Lake playa to extract a wide variety of saline minerals.

The company is now involved in a large expansion program. In view of this projected expansion, the growing fuel shortage and continuously rising fuel costs, Kerr-McGee has become interested in exploring the possibilities of finding a heat source close to its present operations. While steam will probably not be produced, hot water can still be utilized as process water. Using geothermal hot water for this purpose could give the lake operations a tool to more efficiently control the quality of the brine fed to the plant. Additionally, the company has been pumping ground water from wells in the vicinity of the proposed project area for many years.

The purpose of the proposed action is to explore, develop and utilize the area's geothermal energy as a supplemental or alternate energy source in processing plants and to protect ground water rights in the area which might otherwise be lost to the applicant if the waters are later declared geothermally valuable.

The environment of the project area is typical of the regional desert. The project site lies in and on a closed drainage basin approximately two miles northeast of Trona airport. There is sparse vegetation and typical desert wildlife. While some cultural or archeological resources were identified within the larger Federal study area, none are known to exist on the State-owned parcel.

The proposed exploration program involves the following operations:

1. CASUAL SURFACE EXPLORATION --Aerial surveys geophysical/geochemical surveys, off-road travel for exploration crews and their equipment including vehicles.
2. TEST DRILLING -- This involves road and wellsite construction, including camps and the operation of heavy drilling equipment.

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3. PRODUCTION TESTING -- In this operation, potentially productive wells are vented periodically to establish flow rates and other reservoir characteristics.
4. RESTORATION -- In this operation unproductive sites and/or unnecessary portions of disturbed areas are abandoned and restored.

IMPACTS

LAND

Casual surface disturbance will have little or no effect on the land involved. Vehicular operation on roads and travel across country will be largely unaffected.

More substantial impacts may occur from road, wellsite or any other construction activities during the other actions of this stage.

The valley portion of the study area (where the State-owned parcel is located) would be less affected by any construction as the alluvial surface is relatively easily worked and less susceptible to erosion.

Blowouts and fluid spills during this stage may cause cratering, channeling and erosion along drainage channels. On the valley floor existing drainage contains in the study area cross numerous dirt roads, pipelines and other highway. Damage to these improvements from escaping fluids will depend upon the volume and nature of the liquid. Any major fluid spills would travel no further than the Searles Lake playa to the southern margin of the study area. This is very important in that even a major spill of fluid would be restricted by the valley's natural drainage.

WATER

Casual surface disturbance would have little effect on the valley's water resources. Potential threats to springs and groundwater arise from construction and fluid spills during drilling and testing phases. The valley's groundwater supply could be degraded by the downward percolation of water in seeps or from fluid spills.

AIR

Additional particulate matter from surface disturbance, toxic gases from blowouts leaks and seeps are the principal threats to air quality during this stage. Vehicular operation on unpaved roads together with road and wellsite construction in all areas would be major sources of particulate constituents. Exhaust from equipment and machinery would also be a source of carbon monoxide and nitrogen oxide emissions. Gases common to confined areas, ammonia, hydrogen sulfide, and methane are also present in significant quantities and may be expected.

CULTURAL RESOURCES

As long as exploratory activities do not take place on top of or immediately adjacent to archeological or historic sites, no impacts are anticipated to these resources. Indirect impacts could come from increased access or increased erosion.

FLORA

Discrete operations in the exploratory stage will have predominantly short-term impacts on the flora. Longer-term impacts may result, of course, as recovery time is a function of the severity of surface disturbance. Surface geologic exploration, mapping and sampling, although essentially without substantial environmental impact, may nevertheless disturb individual plants along road and trails when crews and vehicles are operating. Drilling of shallow temperature or seismic holes will involve greater land disturbance from associated site clearing. Drilling of test holes involves larger areas, but impacts will remain substantially the same.

FAUNA

Removal of vegetation during this stage will reduce forage available for herbivores. Construction and operation of facilities will produce a nuisance factor tending to restrict the movement and feeding efficiency of wildlife. Losses will occur by direct and indirect means in all phases of exploration and development. If vegetation suffers from chemical poisoning, fauna could be impacted. Recovery time is dependent on the severity of surface disturbance and resulting effects on vegetative communities. Long range impacts could result if reduction in vegetation severely altered the existing food chain. Direct mortality would probably occur during all phases from blowouts, physical impact with equipment, poisoning with toxic liquids and gases, noise and general disturbance of the ecosystem.

MITIGATION

1. If archeological or cultural sites are discovered on the project area, the applicant must notify the Division and hire a qualified archeologist to salvage the sites if it is determined that sites must be disturbed in order to produce the resource.
2. No surface occupancy will be allowed within 200 yards of any spring.
3. A restoration program for all areas disturbed by exploration operations shall include a provision for scarifying.
4. The Division may require that any disturbed area be reseeded and may specify vegetative types.
5. The applicant will be required to remove all surface or exposed improvements upon termination of the permit or lease.

6. All garbage, trash or other solid waste will be removed and disposed of at a legally established sanitary landfill.
7. Toxic drilling fluids will be disposed of in a non-polluting manner.
8. Excavated pits or sumps used in drilling will be backfilled as soon as drilling is completed and restored to conform with the original topography. If any sump is determined to pose a threat to wildlife, the applicant may be required to erect fencing.
9. Earthwork containment berms or structures will be placed around facilities susceptible to leaks or spills.
10. All single-phase powerlines will be installed with a raptor shock prevention device.

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PERSONS CONSULTED DURING PREPARATION OF THE SEARLES VALLEY ENVIRONMENTAL

ANALYSIS RECORD

Bureau of Land Management Desert Planning Staff
156 Spuce
Riverside, CA 92507

U. S. Geological Survey
Area Geothermal Supervisor
345 Middlefield Road
Menlo Park, CA 94025

Kerr-McGee Chemical Corp.
Trona, CA 93562

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Comments on the Draft EAR were received from the following agencies: Kern County Planning Department, State Office of Historic Preservation, U. S. Geological Survey, U. S. Fish and Wildlife Service, Lahontan Regional Water Quality Control Board and the California Department of Fish and Game.

These comments were noted and wherever possible the suggestions were incorporated into the Final EAR and were considered in the final decision to lease certain portions and delete other environmentally sensitive areas from final leasing program. One letter of comments was answered directly. Those comments and responses follow:

ROY C. HAMPSON, EXECUTIVE OFFICER
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD--LAHONTAN REGION

We have reviewed the above-mentioned E.A.R. The California Regional Water Quality Control Board, Lahontan Region is the State agency responsible for the control of waste discharges in the Mojave area. To enable the Regional Board to carry out its responsibilities, the law makes it mandatory that any person discharging or proposing to discharge waste within any region file with the Regional Board of that region a report of waste discharge. The law provides that the Regional Board, after a public meeting, shall prescribe requirements as to the nature of the nature of the existing or proposed discharge with relation to the conditions to be maintained in this disposal area.

On May 8, 1975, the Lahontan Regional Board adopted the Water Quality Control Plan for the South Lahontan Basin of which Searles Valley is a part. The plan establishes the following beneficial uses for the waters of the Searles Hydrologic Unit:

1. Searles Lake
 - a. Industrial service
 - b. Non-contact water recreation
 - c. Wildlife habitat
 - d. Saline water habitat
2. Streams
 - a. Groundwater recharge
 - b. Water-contact recreation
 - c. Non-contact water recreation
 - d. Wildlife habitat
3. Springs
 - a. Municipal and domestic
 - b. Groundwater recharge
 - c. Water-contact recreation
 - d. Non-contact water recreation
 - e. Warm freshwater habitat
 - f. Wildlife habitat

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Waste discharge requirements prescribed by the Regional Board for discharge in Searles Valley will reflect its concern for the protection of these beneficial uses.

This E.A.R. mentions that high salinity fluid produced by the exploration program will be piped and released at the barren edge of an evaporite deposit south of the lease area. The report states that potential damage to surface and groundwaters may result from construction activities, fluid spills during drilling and testing phases and the percolation of water held in sumps.

The mitigation measures outlined in this E.A.R. to protect water quality are too general in nature to enable this agency to determine if water quality will be protected. The Regional Board will require a report of waste discharge be filed for this proposed project, and the Regional Board will require that it contain all plans and specifications for measures to be taken to protect water quality. This will enable the Regional Board to more fully evaluate the potential impacts of this project on water quality. Although the report of waste discharge must contain specific mitigation measures, we believe the E.A.R. also should provide more detail as to the toxic nature of drilling muds and their disposal, as well as contingencies to control geothermal waters in the event of a blowout during drilling.

Any activity in the vicinity of surface waters will be carefully scrutinized in view of its limited quantity in this area. In any event, the Regional Board, by adoption of waste discharge requirements will not allow waste discharges to occur which could degrade surface or groundwater quality.

LOUIS A. BOLLS, DISTRICT MANAGER
BAKERSFIELD DISTRICT, BUREAU OF LAND MANAGEMENT

Your concern regarding the potential environmental impacts discussed in the Searles Valley Environmental Analysis Record as expressed in your letter of June 8, 1976, has been noted and will be considered in reaching our decision as to the leasing of the proposed areas.

As the Environmental Analysis Record was a draft version, your comments to the extent applicable will be incorporated in the final version.

The purpose of an environmental analysis record is to identify and analyze potential impacts of possible geothermal operations.

There is very little definite indication of geothermal resources in the subject portion of Searles Valley. This lack of information is significant in that it is subsequently difficult to predict in the analysis the nature of environmental impacts associated with future lease development which will themselves be a function of a future exploration program.

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In order to overcome this aspect, most analysts approach the problem by assessing all the possible results of an exploration program that would have environmental implications. As such, the discussion of the impacts and mitigating measures must of necessity remain very general in nature.

To attempt to address specific site impacts and resulting mitigating measures prior to knowing what the specific site impact is, seems to require more than the above hypothetical model can give.

Fortunately, this problem has been foreseen and there exists applicable regulations which provide for a second thorough analysis which addresses itself to specific impacts of any subsequent actions of the lessee.

Therefore it would seem logical to address specific impacts such as possible toxic drill muds, contingency plans of potential but rare blowouts, and applicable mitigating measures when and if the specific actions which might lead to these conditions are known.

The following comments were received by State Lands in response to the request for consultation on the Initial Study and Negative Declaration for the Kerr-McGee prospecting permit:

THOMAS E. BAILEY, ASSISTANT CHIEF
STATE WATER RESOURCES CONTROL BOARD

Comment:

We have coordinated the review of the subject Initial Study with the California Regional Water Quality Control Board, Lahontan Region. The Searles Valley Environmental Analysis Record, including the Regional Board's comments and the Bureau of Land Management's responses, sufficiently address our concerns regarding the project. We have no further comments on the project.

No response necessary.

ROGER DE HART, ASSOCIATE PLANNER
INYO COUNTY PLANNING DEPARTMENT

Comments:

1. Inyo County has an ordinance pertaining to the development of geothermal resources entitled "Geothermal Ordinance of the County of Inyo" adopted in 1974. This ordinance requires (Section 19.16.020) that a Conditional Use Permit be processed and approved by the County Planning Commission for any geothermal exploratory project in the County.

We have contacted our County Counsel in order to determine if this ordinance is applicable to State-owned lands. It is the County's opinion that we have no jurisdiction over State-owned lands until a proprietary interest is given to someone else (i.e. Kerr-McGee). We therefore, feel that once this exploration permit is issued to Kerr-McGee they will have obtained a proprietary interest in the subject property and that local ordinances and regulations should be applied. In this case, Kerr-McGee would be required to obtain a Conditional Use Permit through the Inyo County

Planning Commission	
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Since the State Lands Commission is considered as the Lead Agency pursuant to CEQA we will be able to utilize your Negative Declaration for our requirements.

2. The Inyo County Planning Commission has been designated as the Environmental Review Board of the County and the Negative Declaration, when prepared, should be submitted to the Commission for their review and comment.
3. The permit to prospect for geothermal resources should be just that, permission to prospect. If geothermal resources are found and the applicant wishes to develop them, a separate permit should then be processed. In addition, a more detailed environmental assessment should then be made on its impact on the environment, particularly, on the water table, vegetation, wildlife, air quality and the visual aspects.
4. The Negative Declaration should contain a statement regarding any rare endangered plants or animals located in the project area.

Response:

We appreciate the comments submitted by your department, and would like you to know that the applicable portions are already part of our prospecting permits. As we discussed, assessments of rare or endangered species as well as potential impacts on water table, air quality, etc. will not be covered in our Negative Declaration, but are discussed in the referenced BLM document, Searles Valley Environmental Analysis Record.

E. C. FULLERTON, DIRECTOR
STATE DEPARTMENT OF FISH AND GAME

Comments:

We will concur with a Negative Declaration for this proposed action if the following measures, designed to eliminate the significance of the impacts to fish and wildlife, are incorporated into the project.

1. The off-road travel of exploration crews will be conducted only when ephemeral annual desert plants are not actively growing; i.e. during summer or fall or winter or during spring if precipitation is below normal.
2. The test drilling and production testing will not take place within 200 yards of any spring or riparian habitat.
3. The lessee will monitor the groundwater within the lease area to determine the effect his operations are having on these supplies.
4. The lessee will monitor the springs and seeps feeding the drainage in the State Lands lease to determine the effect geothermal leasing is having on them.

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5. Remedial actions will be developed. These will be put into effect in the event the water table is reduced resulting in any springs or seeps drying up or becoming contaminated. These remedial actions may include adding or replacing water of equal or better quality to aquatic areas.

Response:

The following mitigation measures will be incorporated into the permit:

1. Restriction of off-road travel by exploration crews during spring, if precipitation is normal or above, to protect ephemeral annual desert plants.
2. Test drilling and production testing will not take place within 200 yards of any spring or riparian habitat.

Regarding your remaining points which refer to ground water and springs, we feel this exploration phase cannot affect either the ground or spring water. If a geothermal resource is discovered which may lead to production, monitoring of the ground water and springs will be required in the subsequent lease. If the water table is reduced resulting in springs drying up or becoming contaminated due the lessee's activity, remedial action such as you describe will be required.

HERMAN WONG-WOO, CHIEF
STATIONARY SOURCE CONTROL DIVISION
STATE AIR RESOURCES CONTROL BOARD

General Comment

The Great Basin Valley Air Pollution Control District, covering Inyo, Mono and Alpine counties, is the principal air pollution control agency that will review any geothermal development in Searles Valley. The applicant is required to obtain a permit from the District before proceeding with any phases of geothermal development (i.e. well drilling, well cleanout, well testing, standby venting, and full scale production). The District will issue a permit if the proposed project complies with emission limitations and with new source review regulations. If the emissions of any pollutant (except CO) of a proposed source are greater than 15 pounds per hour, the District is required under new source review, to analyze the effect of the proposed source on air quality.

Specific Comments

We have reviewed the Searles Valley Environmental Analysis Record Summary and offer the following comments:

1. The applicant should present data, if available, on the total amount of H₂S and particulate emissions from each phase of

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development. If these data are not available, the applicant should estimate the amount of H₂S emissions from each development phase.

2. The applicant should explain the methods available to mitigate H₂S and particulate emissions during all phases of geothermal development such as well drilling, well cleanout, testing, standby venting, and full scale production.
3. The applicant should discuss steps that will be taken to monitor the emissions of H₂S and particulate matter during each phase of development and production.

Response:

We have received your comments pertaining to the Searles Valley Environmental Analysis Record Summary, as it regards air quality monitoring and H₂S abatement.

The following conditions appear in our standard prospecting permit:

- 7(m). Before commencing drilling operations, permittee shall submit a contingency plan for the protection of personnel and equipment while drilling in rock strata known or suspected to contain hydrogen sulfide (H₂S). Permittee shall establish a training program to promote efficient safety procedures in an H₂S contaminated environment. An H₂S indicator and alarm shall be installed in areas suspected or known by the State Lands Commission to contain H₂S gas which may reach levels considered to be dangerous to the health and safety of personnel. Such contingency plan, training program and detection system are subject to State Lands Commission approval.
- 19(c). Effluent gases shall be continuously monitored at the wellhead in order to determine the emissions of hydrogen sulfide and other toxic materials. The results of complete gas analyses, expressed as quantity of each gaseous component per quantity unit of steam, and including toxic materials that would exist in vapor form at the wellhead temperature, shall be submitted to the Air Resources Board as required.
25. Permittee shall comply with all valid laws of the United States and of the State of California and with all valid ordinances of cities and counties applicable to permittee's operations hereunder, including without limitation by reason of the specification thereof permittee's compliance with all provisions of the Public Resources Code, the Administrative Code, and of the Statutes of California, the enforcement of which are not within the jurisdiction of the State. Permittee further agrees without limitation by reason of the specification thereof to comply with all provisions of Division 3 and Division 4 of the Public Resources Code, Statutes of California, applicable to permittee's operations hereunder, and with all rules and regulations as may from time to time be issued by the State, or by other State agencies.

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applicable to the permittee's operations hereunder. Permittee also agrees that in its employment practices hereunder it shall not discriminate against any person because of race, color, religion, sex, ancestry or national origin.

The data you request are not available at this time. When the data become available, however, the results will be forwarded to you.

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MAILING LIST
FOR
RESPONSIBLE AGENCY "CONSULTATION" LETTER

File Ref.: W 9716

November 8, 1978

MEMOS MAILED

1. State Department of Health
Mr. Kenneth Buell
Environmental Health Service Branch
C.B. 8, Room 430
714 "P" Street
Sacramento CA 95814
2. Regional Water Quality Control Board
Lahontan Region
P. O. Box 14367
South Lake Tahoe, CA 95705
3. Geothermal Officer
Division of Oil & Gas
1416 Ninth Street
Sacramento, CA 95814
4. State Air Resources Board
Planning Division
1131 "S" Street
Sacramento, CA 95814
5. Dr. Knox Mellon
State Historic Preservation Officer
Office of Historic Preservation
Department of Parks and Recreation
P. O. Box 2390
Sacramento, CA 95811
6. Mr. Stephen M. Rios, Executive Secretary
Native American Heritage Commission
1400 - 10th Street
Sacramento, CA 95814
7. E. C. Fullerton, Director
Department of Fish and Game
1416 Ninth Street - 12th Floor
Sacramento, CA 95814
8. Ms. Kathryn Tobias
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

LETTERS MAILED

9. Air Pollution Control Officer
Great Basin Unified Air Pollution Control
District
873 N. Main Street - Suite 213
Bishop, CA 93514
10. Chairman, Planning Commission
County of Inyo
Courthouse
168 N. Edwards
Independence, CA 93526
11. Chairman, Board of Supervisors
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