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Subject: Oceano Dunes APCD Hearing
Date: Sunday, April 22, 2018 8:00:07 PM

Please admit this letter to the record for the April 30th Air Pollutions Control District (APCD) hearing regarding the Oceano Dunes State Vehicular Recreation Area (ODSVRA).

I have been reviewing files regarding the dust issue on the Nipomo Mesa and have some concerns regarding statements made by Larry Allen, the former Air Pollution Control Officer (APCO). At the last hearing Mr. Allen was asked about why the APCD under his command did not release the test data from the APCD silica tests that were conducted which showed no silica PM (2.5 or 10) coming from the ODSVRA.

Mr. Allen stated under oath that silica is a "red herring" and that silica is not the issue.

However, there are numerous instances over the years where Mr. Allen has highlighted the high concentrations of silica particulates coming from the Oceano Dunes.

For Instance, at the November 16, 2011 APCD Board Meeting, Mr. Allen stated the following:
"So in 2004/2005, we did basically some saturation monitoring up on the Mesa with PM10 and PM2.5 samplers that ran for an entire year. And we did a number of interesting things in looking at the data. We did a lot of speciation to try to determine what the chemical composition of the particulate matter was that we were measuring. And we found that it was predominate -- on the days when we were exceeding the standards, it was predominately silica, which is sand, essentially. And we saw exceedances of both State and Federal health standards. The State standard in particular was exceeded 28 percent of the sample days during that study. And the primary cause was very definitely identified as northwest wind events that would carry sand particles from the area of the Oceano Dunes up to the Mesa."

Mr. Allen and others associated with the APCD have falsely stated that silica is coming from the ODSVRA, when now numerous studies conducted by State Parks corroborates the APCD's own study that no silica is coming from the ODSVRA.

The false narrative by the APCD of silica coming from the ODSVRA has been used to scare residents and to garner support from other state agencies.

If silica is indeed the "predominate source" as Mr. Allen stated in 2011, and all testing to date shows no silica is coming from the ODSVRA....then where is the silica coming from?

The APCD cannot define what percentage of dust is coming from the ODSVRA...therefore how can a hearing board determine what to abate?

State Parks should not close any more land at the ODSVRA until a full accounting of all the emitters is properly categorized to ensure what the source of the dust is.

Sincerely,

Aspen Desaire

Denair California