

APCD_slcleanair

From: Chris Sorensen <cwsorensen99@hotmail.com>
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To: boardclerk@slcleanair.org
Subject: [EXT]Hearing Board Meeting on October 14, 2022 - Public Comment

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To Member of the APCD Hearing Board:

The proposed Order to Modify the Existing Stipulated Order of Abatement (OMESOA) is an acknowledgement that the original order failed to define how the air quality standards should be applied to the SVRA. A violation of the California PM10 standard is any 24 hour average concentration greater than 50 micrograms/cubic meter. The question not addressed by the existing SOA is: How many violations can be attributed to conditions on the dunes caused by off-highway vehicle riding on the dunes? This question is not answered directly in the OMESOA either. Instead, absolute compliance with the PM10 standard is replaced by requiring State Parks to "...eliminate emissions in excess of naturally occurring emissions...". This answer brings with it a new question, how to determine excess emissions.

The OMESOA proposes to establish the natural emissions level of the SVRA riding areas by using the computer models driven by the emissions data that has been obtained from monitoring instruments on the dunes. However, the APCDs modification application raises many questions about the modeling done to set the 40.7% reduction goal recommended by the Scientific Advisory Group. There seems to be many uncertainties and technical issues yet to be resolved. So the OMESOA provides a process for ongoing analysis, modeling and dialog among the experts. Meanwhile, the biggest question remains unanswered. How many exceedances of the PM10 standard per year will the APCD find acceptable under the California Health & Safety Code section 41700?

There is an answer immediately available to the APCD without working backwards from modeling the presumed and theoretical level of emissions that existed in 1935. The OSO Flaco PM10 monitor has been recording concentration levels emitted from an undisturbed dune complete south of the SVRA. So far this year this monitor recorded only six PM10 exceedances of the standard. In the same timeframe the CalFire PM10 monitor registered 57 exceedances. This simple, real world comparison demonstrates how much SVRA emissions reduction is yet to be realized. Setting the natural emissions target and the number of expected natural exceedances on real world data makes much more sense than using computer modeling subject to ongoing doubt. It would also be much more credible to a public suffering from the unsolved SVRA dust nuisance.

Chris Sorensen