

October 11, 2023

Dear APCD Hearing Board Members,

This is to express my concern and disappointment over the provisional approval by the SLO County APCD of the Provisional Final 2023 Annual Report and Work Plan (ARWP) with no further significant mitigation efforts to reduce particulate emissions from the Oceano Dunes. While progress may seem to have been made recently, now is not the time to accept less than all that can be done to promote public health. We know that any exposure to elevated levels of PM_{2.5} and PM₁₀ particles can be dangerous.

Chapter 3 of the ARWP proposes no new dust control measures because of: 1) a reduction of the emissions target, 2) uncertainty about pre-disturbance modeling, and 3) an expected new modeling framework.

None of these reasons are in the public interest. The APCD SAG has wisely noted that when forced to choose among uncertain options, “err on the side of public health”. This also applies to choices about mitigation action - health should be paramount.

Reason 1 above is based on a “management objective . . . to reduce emissions of PM₁₀ from the ODSVRA to a level consistent with dust emissions prior to significant OHV disturbance” Since it is now thought - despite reason 2’s uncertainty - that the original SOA 50% reduction would yield emissions “substantially below” what might have existed, success is defined as meeting a lowered target. In other words, if the wind has always blown hard enough for unhealthy emissions, let it keep happening because it’s nature’s way. But is it really OK to accept the health risks of many years ago?

I take the view that engineers manipulate nature for human purposes. Advancing technology promotes quality of life by overcoming natural limitations. Let’s apply this perspective and not accept what was had before.

Also, reason 3 should not be valid because inaction merely prolongs an already unacceptably long process of mitigating dust emissions. Let’s get this done!

Without further mitigation, harmful conditions will still afflict people living in the plume. In fact, it is likely that climate change will only increase significant wind events. Yet with this plan, we will not prepare for these and the agencies responsible for protecting our public health will be constrained to inaction.

Thus, I urge the Hearing Board to consider the bigger picture and not be content with the current plan. Continuing reasonable mitigation actions, such as expanding permanent plantings, should be implemented along with continuing studies to refine the relevant data. Stay the course!

If this requires rethinking the target, so be it.

Sincerely yours,

J.P. O’Connell, Nipomo, CA