

Dear Sirs and Madams:

April 22, 2018

Re: Petition 17-01, ODSVRA Considerations, APCD Meeting April 30, 2018

Larry Allen, 2008, Nipomo Services District: "the largest portion by far, of what we are seeing out there, is coming in the form of ...sand ...silica"

Larry Allen, 2011 APCD Meeting: "...predominantly silica, which is sand."

And then the story changed;

Larry Allen, March 21, 2018, states of the aforementioned Silica "it's a red herring", "disappointed to see it even mentioned in t the proposed abatement order" in response to questions as to why the APCD withheld test data proving that silica dust is not coming from the ODSVRA. He alleges it has no bearing whatsoever. Really?

Now the APCD is trying to redirect our attention away from silica and to only PM 2.5 and PM10 particles. Why?

After years of claiming the dust is "predominantly silica" we now have scientific studies that prove no silica is coming from ODSVRA.

Over the past decade, the APCD and the APCO have deliberately made unsupported allegations regarding crystalline silica coming from the ODSVRA. Letters, emails, news articles and public statements are available regarding the APCD promoting harmful silica coming from the ODSVRA when there is no supporting evidence.

The APCD completed studies in 2017 on several data samples collected over the April, May & June time frame, yet these studies were never made public. California State Parks then performed their own study and published a report in December 2017 which also includes copies of the APCD report. This report states: "Analytical results (attached) indicate *none of the samples obtained by this investigation exceeded the current occupational health standard for total dust, respirable dust or quartz.* Crystalline silica (quartz) results were *below the detection limit for the analytical technique applied and volume of the air filtered for each sample*".

Further studies, such as that conducted by Dr. Palenik of UC San Diego (Scripps) found that "the sourcing of airborne PM10 detected in this coastal setting is more complex, a function of several phenomena that occur on land, the ocean, and in the air. An ocean source of planktonic and related bacterial PM10 is potentially far greater than other sources because the area of ocean surface where phytoplankton blooms occur offshore from Oceano Dunes is tens of thousands of acres larger than the OHV riding area of the State Park." Also, that "Nearby coastal seawater is contributing biological material to PM10 aerosols (10 microns or less) detected and captured inland at monitoring sites using EBAMs. This likely includes whole microbes, ranging from the one micron sized bacteria to small eukaryotes less than 10 microns such as small diatoms. Potentially fragments of larger."

So which is it...Silica dust from off road activity at ODSVRA, or natural occurrence because the entire area, (including Nipomo Mesa) is adjacent to that giant body of water called the Pacific Ocean? Some things you just can't control...

I, along with many others, am very concerned that the APCD is trying to use bad data and bad science to justify their desire to close off more acreage at the Oceano Dunes for vegetation. All of this under the guise of protecting the health of those on the Nipomo Mesa.

What other possible benefit could there be? Certainly not further development? What is to be gained by virtually eliminating millions of dollars from a local economy, which according to surveys and financial impact reports would not be returning if "the dunes" were closed to public access? Certainly, if there is such a health risk to the residents of the Nipomo Mesa and adjoining areas, further residential development should cease, so as not to risk the health of potential future residents. Perhaps serious consideration should be given to compensation for those directly affected by the lack of emphasis of health risks in property transaction disclosures?

At a huge financial cost of the area, it seems that honesty and legitimate, consistent and correct science should take the forefront, and be used to guide further decisions made by the APCD and affiliated bodies.

Thank you for your consideration.

Respectfully,  
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