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Subject: Hearing Board of the San Luis Obispo County Air Pollution Control District, Case No. 17-01
Date: Thursday, April 26, 2018 3:41:57 PM

April 26, 2018

Members of the Hearing Board of the San Luis Obispo County Air Pollution Control District
RE: Case No. 17-01, [PROPOSED] STIPULATED ORDER OF ABATEMENT

Dear Members of the Hearing Board,

This is to communicate my views about the proposed order. As a multiyear resident of the Nipomo Mesa, I am involved in this case and affected by outcomes you will be deciding.

I acknowledge that progress has been made over the last few months to formulate a compromise among the competing values of the Parties. The proposed order finally accepts that the situation is a public health problem and articulates some of the requirements for a meaningful plan:

1. Goals for reducing emissions to a defined level by a specified time
2. Listing steps toward achieving the goals
3. Specific responsibilities of stakeholders and agencies
4. Reporting and monitoring actions, including engagement of a Scientific Advisory

Group, who is expected to provide adequate expertise and commitment to actively guide the process.

However, I believe that certain refinements would strengthen prospects for achieving the objectives. My concern is that important specifics have been omitted. These are the following:

1. Sections (4) and (6) provide too limited descriptions of milestones to be met.

Specific annual targets for abatement are clear even now, and should be stated explicitly.

2. Section (6) does not give specific actions to be taken in the event of noncompliance or not meeting milestones. Given past nonperformances by State Parks, these are possibilities. Consequences of violations should be spelled out.

3. The time of February 2019 for formation of the SAG and submission of a full plan is inappropriate and unnecessarily late. It is too close to the time of abatement activities for the 2019 dust season. If there are issues with the plan, achieving their resolution could cause missing another opportunity for mitigation. I urge the Board to set November 1, 2018 as the time for initial organization. This is consistent with the annual schedule of Section (5).

Thank you very much for your consideration. I am grateful for the time, effort, and patience you have demonstrated during this challenging process.

Sincerely yours,

John P. O'Connell
Nipomo, CA