

Yarrow Nelson, Acting Chair
San Luis Obispo County
Air Pollution Control District Hearing Board
3433 Roberto Court
San Luis Obispo, CA 93401

Subject: Public Health Protection Comments in re: April 30th Hearing

Dear Dr. Nelson and Members of the Committee:

On behalf of the American Lung Association in California, I am writing to express our ongoing support for immediate actions to reduce particle pollution and public health impacts associated with recreational vehicle activities at the Oceano Dunes State Vehicular Recreation Area.

In our January letter, we outlined the significant public health problems caused by breathing elevated levels of particle pollution, including impacts to childhood lung development, increased severity of asthma attacks, emergency room visits and hospitalizations for respiratory issues, cardiac impacts and premature death. Our comments were prompted by the ongoing concerns over increased particle levels associated with the riding areas and urged you to take cooperative actions with state and local partner agencies to come to an agreement as quickly as possible. On April 18, 2018, the American Lung Association's 2018 *State of the Air* report was released, once again including the San Luis Obispo metropolitan area among the most particle-pollution impacted regions in the United States. We are hopeful that the hearing board and stipulated agreement processes will generate actions that reduce this threat to public health as quickly as possible.

We believe the solutions are at hand to address this lingering problem and improve health – but it is clear that ongoing delay will lead to ongoing health impacts. As the board approaches the April 30th hearing, we believe that a final order should result in the following:

Immediate actions to generate emission reductions in 2018. The proposal calls for actions that would be taken between June and September 2018 to begin to provide near-term emissions. These actions should begin as proposed to provide long-overdue relief to residents downwind of the riding areas. We believe that further delaying these immediate steps - or the full scope of needed mitigations - is not in the interest of public health.

A 50 percent emission reduction. The American Lung Association supports requiring mitigation actions that achieve a minimum reduction of 50 percent over a four year period combined with appropriate enforcement mechanisms to ensure achieving that target. As discussed at the March 21, 2018 hearing, halving emissions could bring particles down to ranges experienced in other areas of the County not impacted by the more emissive riding areas. We believe that mitigation actions that will achieve a 50 percent reduction should be front-loaded in order to create near term emission reductions and a foundation for benefits that grow over time.

Clear milestones for annual mitigation actions and estimated emissions targets. The prior proposed order included specific annual plans and actions that would generate emissions

reductions (i.e. 5 percent per year) following the estimated 12 percent reduction created by 2018 early actions. We recommend the final order include clear milestones for enforceable actions to reduce particle levels by 50 percent.

We urge the hearing board to move forward with a final order that assures immediate, clear and enforceable emission reductions so that all residents of San Luis Obispo County can enjoy healthier air as the result of this process.

Sincerely,



Bonnie Holmes-Gen
Senior Director, Air Quality and Climate Change

