

SLO Air Pollution Control Hearing Board

Groundhog Day, aka April 30, 2018

Michael S. Young

Nipomo, CA

[Proposed] Stipulated Order of Abatement

Truth or Consequences

**Regrettably & Shamefully
Neither**

Truth or Consequences

Legal defects...

Finding of “no public nuisance” is false; the case has not been heard

No operating agreement exists between Parks and SLO County

“Force majeure” inventions are excuses for delay and non-compliance

“Negative externality” is, in fact, a taking by State Parks

Truth or Consequences

Operational deficiencies...

CARB model trumps reality unnecessarily

Model measurements are not actual air pollution measurements at real monitors

No control or baseline monitor, such as Oso Flaco, and no margin of error in measurement

Timetable ignores the urgency; 5 years!!

Built-in process delays (SAG, for example)

Tying abatement to “Public Works Plan” is unnecessary and irrelevant (see CCC)

Truth or Consequences

Mathematical reality...

Model algorithms are poor substitutes for factual measurement

24-hour average PM threshold for “exceedence” is a misunderstanding of the distribution of PM concentrations at ODSVRA

PM magnitudes are more important than frequencies

Truth or Consequences

Fatal flaws in the SOA...

No responsibility and no urgency

No use of Oso Flaco or other ambient air quality control sites

No appreciation for the hourly distribution of PM concentrations

No measurement metrics based on real data

No consequences for non-compliance

No effective dispute resolution scheme

JUST SAY NO...

**To this insulting abdication of
responsibility and professional
conduct.**

**The citizens of SLO County
deserve and demand better.**