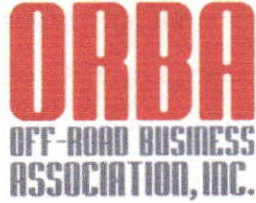


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APR 10 2018

AIR POLLUTION CONTROL DIST
SAN LUIS OBISPO COUNTY



April 1, 2018

California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
Attention: Secretary John Laird

SLO County Air Pollution Control District
Att: Board Members
3433 Roberto Court
San Luis Obispo, CA 93401

RE: Oceano Dunes Silica Management

Dear Mr. Laird and Board Members;

The Off-Road Business Association ("ORBA") and One Voice is contacting your Offices regarding recent management efforts targeting mitigation of silica alleged to be coming from the Oceano Dunes SVRA. Prior to addressing the specifics of these concerns, a brief summary of the Off-Road Business Association ("ORBA") is needed. ORBA is a national not-for-profit trade association of motorized off-road related businesses formed to promote and preserve off-road recreation in an environmentally responsible manner and appreciates the opportunity to provide comments on this issue. One Voice is a non-profit national association committed to promoting the rights of motorized enthusiasts and improving advocacy in keeping public and private lands open for responsible recreation through strong leadership, advocacy, and collaboration. One Voice is a partner of ORBA and provides a unified voice for grassroots motorized recreation organizations through a national platform that represents the diverse off-highway vehicle (OHV) community. Collectively in these comments ORBA and One Voice will be referred to as the Organizations.

The Organizations are very concerned that the silica levels in the air around the SVRA has been a discussion topic for more than a decade, and often the SVRA has been the target of these concerns and may be forcing SVRA managers to make decisions simply to appear to be doing something on the issue. While this issue has been a concern for more than a decade, very little basis for the concern has been documented with scientific research in the SVRA area and all

research we are aware of has concluded this concern is simply not present in the SVRA area. Rather that resulting from SVRA activity, recent site specific research from the State of California concluded that algae blooms in adjacent ocean waters were the probable source of airborne silica especially under specific wind conditions.

This lack of scientific basis for silica concerns, especially in the SVRA, was again demonstrated by the conclusions of research of air quality for employees of the SVRA who operated OHV's throughout the day. This research concluded there was no silica levels exceed acceptable occupational safety standards in sampling equipment for employees after working all day on the SVRA. These conclusions were not unusual as silica particles both inside and outside the SVRA boundary are hundreds of times larger than those particles that could negatively impact respiratory system functions or exceed occupational safety standards. The Organizations have not included hard copies of this research as we are aware this work is already in the administrative records of the SVRA and Pollution Control Board.

The Organizations welcome proactive management of any issue that could be negatively impacting the health and safety of those employed by, using or living near the Oceano Dunes SVRA. This support of proactive management is not without limitation, as management actions should have some cause and effect relationship and balance the mission and purpose of the SVRA. Proactive management of any issue must start with the fact that the management concern is scientifically based and that management actions being taken are addressing the actual cause of the issue. Both of these matters are of specific concern here as credible research from both the State and Private sectors has drawn any relationship of these issues into serious question.

While the scientific basis for concern is in question, the negative impacts to the mission and purpose of the SVRA are not. Expansion of areas fenced off limits to recreational activity in the hope of revegetation of these areas which would improve the silica issue will not mitigate the cause of the issue, mainly algae blooms in adjacent off shore areas. While no scientifically based management or benefit has been established from these "mitigation" activities, the mission of the SVRA, mainly providing a high quality recreational experience to users of these areas, would be immediately impaired.

The Organizations are also concerned that once mitigation measures are put in place, the complete lack of scientific basis for the management will make removal of the mitigation measures very difficult if not impossible, when credible research regarding the source of the silica is addressed. Without a credible basis for the management action, the intent of the management would be left open for discussion and possible revision in the future. Future review that might be involved in removing the fencing and other mitigation measures would simply not be willing to accept the complete lack of scientific basis for the management and be forced to review every reason for the possible fencing. This would greatly complicate reopening of these areas to address the purpose and mission of the SVRA and this should be avoided if at all possible.

Being proactive just to appear to be doing something on any issue is not acceptable and may actually result in more negative impacts to issues that simply are not even being thought of or a concern at this point and these unintended consequences must be avoided. Science based management targeting the true source of the issue is the only way to mitigate impacts and further the mission of the SVRA. If you have questions please feel free to contact either Fred Wiley, ORBA's Executive Director at 1701 Westwind Drive #108, Bakersfield, CA. Mr. Wiley phone is 661-323-1464 and his email is fwiley@orba.biz.

Respectfully submitted,



Fred Wiley, ORBA President and CEO
One Voice Authorized Representative