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**Subject:** OHV Riding Area - Dune Closure  
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To whom it concerns:

I have grown-up enjoying the dunes with my father. He passed away when I was 15 years old, and the one place he loved more than anything was Pismo Beach dunes. As an adult, 45-years old and a single father, I bring my son to enjoy the dunes like I have as a child. Even though, we live in Sacramento, we visit at least 8-times a year. We camp out on the beach, rent ATV's, eat at local restaurants, and add to the local economy. The dunes are a place where family values are built, a community of other dunes rides from all walks of life come together, and help each other out. There are no other places like this in California, and the thought of a few individuals who are using air quality as an issue is wrong.

According to EPA, the air quality at the dunes are below the National Ambient Air Quality Standards which means based on EPA's own regulations do not anticipated any adverse health impacts from air pollution. Only the California Ambient Air Quality Standards claim there's a health impact, if that's the case the whole state nonattainment for something, expect for Lake County because that's the only area in to attain all California Air Quality Standards. I would agree if the area was nonattainment for the federal PM10 standard like in southern California. Even the San Joaquin Valley is a maintenance area for PM10, and they have some of the worst air in all of California.

**Ambient Air Quality Criteria Related to Health and Safety:**

Primary ambient air quality standards are set by the U.S. EPA and California Air Resources Board (ARB) at levels of pollution that will not significantly affect human health, with a margin of safety. Secondary standards under the Federal Clean Air Act, if they differ from the primary standard, protect human welfare and natural systems. Both national and state-level standards exist, with California's state standards usually being more stringent than Federal standards.

U.S. EPA and California ARB designate areas that violate ambient air quality standards as "nonattainment" and sometimes also classify areas as to the severity of nonattainment. The California ozone standard has a "Nonattainment-Transitional" designation for areas that are close to attainment but not quite there. When U.S. EPA redesignates an area from nonattainment to attainment, a "maintenance" requirement applies that maintains most nonattainment planning and regulatory requirements, including "conformity", for 20 years. California standards do not have a "maintenance" requirement, the area either attains or does not.

Air quality standards are usually stated in the form of either a mass fraction (parts per million – ppm or parts per "billion" (thousand million) – ppb) or concentration ( $\mu\text{g}/\text{m}^3$ ). Standards can be "not to exceed" or based on exceedance of a specified mass fraction/concentration over a specified period of time. Most state standards are "not to exceed" or "not to exceed more than once a year." Federal standards vary. California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM10, PM2.5, and visibility reducing particles, are not to be exceeded. All other California standards are not to be equaled or exceeded. Federal standards allow one exceedance per year in a three year period unless stated otherwise.

The "conformity" process under Section 176(c) of the Federal Clean Air Act (49 USC 7506(c)) is separate from but coordinated with the NEPA environmental review processes, and shows that Federal decisions meet the letter and spirit of the State Implementation Plan for attaining and maintaining Federal ambient air quality standards. Because of technicalities about how the conformity process works, compliance with conformity requirements should not be confused with NEPA and CEQA requirements for environmental evaluation criteria or thresholds of significance. The conformity process is governed by U.S. EPA regulations at 40 CFR Part 93; transportation planning and project requirements are in Subpart A, and requirements for Federal actions by agencies other than FHWA and FTA are in Subpart B. California

State Standards do not have a conformity process, or a process for attaining a standard.

Sincerely,

Rodney Tavitias