

April 25, 2018

Air Pollution Control District Hearing Board
San Luis Obispo County

Re: Public Hearing on Monday, April 30, 2018 at 9:00 a.m.

Hearing Board Members,

Thank you for the opportunity to comment on the Proposed Draft Stipulated Abatement Order submitted by the California Department of Parks and Recreation outlining State Park's latest plan for dust abatement activities at the Oceano Dunes State Vehicular Recreation Area. My wife Heidi and I live in Southern San Luis Obispo County on the Nipomo Mesa, due east of the Oceano Dunes SRVA. We have reviewed the Proposed Draft and find it to be woefully inadequate to address the immediate needs of all those living and working on the Nipomo Mesa whose personal health and well-being are threatened on a daily basis by the dangerous crystalline silica particulate emissions being generated directly from the Oceano Dunes SRVA. We would like you to consider the following points regarding this matter:

1. Residents and workers on the Nipomo Mesa deserve clean air now, not five or ten years from now. The Hearing Board needs to act now to provide immediate relief to those affected by this man-made source of air pollution. In all due respect, please remember the mission statement of the APCD:
 - realize and preserve clean air for all,
 - promote community & individual responsibility for air quality
 - provide quality & cost-effective service

You are the primary agency responsible for achieving clean air standards established by the California Air Resources Board and the U.S. Environmental Protection Agency.

2. Dust being created and emanating from the Ocean Dunes SVRA has too long been a public health concern. As documented by your own monitoring, State and federal standards for both PM10 and PM2.5 particulate matter (PM) are frequently exceeded on the Nipomo Mesa.
3. The San Luis Obispo County Air Pollution Control District (APCD) undertook studies in 2004 and 2010 and concluded that OHV activity was a major contributing factor to high particulate matter in downwind residential communities – accounting for 75% of the days in which limits were exceeded.
4. On May 15, 2017, Mary Jean Sage, Chairperson of the San Luis Obispo County Health Commission, issued a letter to the SLO County Board of Supervisors regarding health impacts related to the elevated levels of Particulate Matter in the Nipomo Mesa/Oceano Dunes area. In her letter, Ms. Sage comments that after rigorous studies conducted by the APCD and other research organizations, the science demonstrates unequivocally a clear connection between OHV use on the dunes and the Nipomo Mesa residents' and workers exposure to serious health consequences from the dust emanating from the dunes. Strong scientific consensus holds that

both short and long term airborne PM exposure cause serious lung and cardiovascular disease. The SLO County Health Commission recommends a vigorous response to this significant ongoing health risk and a rigorous review of the California State Parks proposed mitigation project, including public reporting.

5. According to U.S. EPA reporting, on some days during recent weeks air quality on the Nipomo Mesa has been measured to be the worst in the nation for hours on end. There is no excuse for this situation to continue!
6. The APCD Hearing Board should direct immediate closing of the most emissive 200 acres in the OHV riding area now and should order that the 200 acres closed be fully vegetated by September 1, 2018.
7. The APCD Hearing Board should order restoration of a fully vegetated fore dune area by September 1, 2018.
8. The APCD Hearing Board should carefully measure the results of the 200 acre abatement effort and if the particulate pollution level is not reduced by 50%, another 100 acres should be closed and revegetated by September 1, 2019.
9. The APCD Hearing Board should stipulate and enforce punitive fines for non-performance of this abatement order.

For ten long years the residents living and people working on the Nipomo Mesa have been suffering from critically unhealthy air quality caused directly by the OHV use in the Oceano Dunes SVRA. To date, any and all attempts to mitigate the dangerously high levels of PM 10 and PM 2.5 particulates being generated from the Oceano Dunes SHRA have been unsuccessful. We can no longer abide the lame excuses and unfulfilled promises made to address this most critical and precious of all issues, preservation of human health and wellbeing. Something must be done and it must be done now! As we look outside our window to the west, on most days dust particulates are readily visible in the air as a light brown haze. Is it safe to be outdoors in such conditions? No sirs it is not! It is not the dust you can see that worries us the most, but instead it is the finer particles of silica sand dust also present in the sand haze, particles not even visible to the human eye that are known to be responsible for causing silicosis and lung cancer. APCD Board members, please do something to protect the citizens on the Nipomo Mesa now. Tomorrow may be too late. My wife and I thank for your time and consideration.

Sincerely,

Scott and Heidi DiSalvo
Nipomo, CA