



Air Pollution Control District  
San Luis Obispo County

**VIA EMAIL & US MAIL**

October 30, 2020

Sarah Miggins  
California Department of Parks and Recreation  
P.O. Box 942896  
Sacramento, California 94296-0001

SUBJECT: Comments on the September 2020 OHV Commissioned Scripps Report

Dear Sarah Miggins:

As you are aware, the District has serious concerns regarding the September 2020 OHV-Commissioned Scripps Report (see our attached comments). We are aware that this study was not authorized under State Parks' current management, but since it was released to the public by State Parks and has been utilized in numerous public comments and media reports, we are compelled to respond.

The District's primary concern focuses on the nature of the report and its application. The preliminary report does not alter the accepted understanding of the dust issue on the Nipomo Mesa nor does it undermine the years of scientific studies that were previously conducted.

Key issues in the attached comments include:

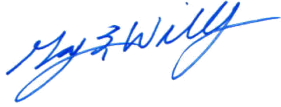
- The Scripps study focused on PM<sub>2.5</sub>, the standards for which are only rarely exceeded. It did not measure PM<sub>10</sub> downwind of the ODSVRA, which is the pollutant targeted by the dust control measures on the ODSVRA.
- The measurement methods used for collecting the PM<sub>2.5</sub> samples are unconventional and unproven; we are not aware of any other studies using these methods to study ambient PM<sub>2.5</sub>.

This preliminary report implies conclusions that are inconsistent with the wealth of information gathered over the last twenty years by experts in the field of study including State Parks' initiated DRI studies and those by other independent researchers using proven techniques.

We are encouraged that steps may be taken to capture PM<sub>10</sub> data and to verify the sampling method. Until we are comparing PM<sub>10</sub> to PM<sub>10</sub> and have addressed the sampling methods, no conclusions or comparisons should be entertained.

Feel free to contact me with any questions or concerns.

Sincerely,



GARY E. WILLEY

Air Pollution Control Officer

Enclosure

cc: Armando Quintero; Director of State Parks,  
Liz McGuirk, Deputy Director State Parks,  
Kurt Karperos, Deputy Executive Officer CARB,  
SLO APCD Hearing Board,  
SLO APCD District Board,  
SLO APCD District Counsel,  
SLO APCD Hearing Board Counsel,  
Coastal Commission Staff,  
Scientific Advisory Group