

Alyssa Roslan

From: Chris Sorensen <cwsorensen99@hotmail.com>
Sent: Monday, October 9, 2023 9:14 PM
To: Alyssa Roslan
Subject: [EXT]Hearing Board Meeting on October 13, 2023 - Public Comment

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Dear Members of the SLO County Air Pollution Control District:

The modified Stipulated Order of Abatement (SOA) approved last year replaced objective compliance with particulate matter concentration standards with theoretical estimates of dust emissions levels based on scientific modeling. As a planning tool, the modeling approach has the advantage of showing where dust controls should have the greatest benefit, across the entire SVRA. The disadvantage is that it requires a lengthy and expensive effort, requiring extensive detailed measurements to calibrate the model and to demonstrate accuracy. It is also fraught with controversy, as the involved experts continue to debate the proper way to apply the available data. The SOA driven testing and modeling efforts to date have apparently been an useful and informative scientific research project. As a means to assure compliance with air quality standards it falls short.

State Parks, the APCO and APCD staff and the SOA Scientific Advisory Group all seem to believe that the modeling-based dust mitigation process is working, and that sometime in the next few years the installed dust controls will achieve emissions levels equivalent to the pre-disturbance level, thereby satisfying the requirements of the SOA. While these parties may be satisfied, the public will be left wondering whether or not compliance with air quality standards has actually been achieved.

The Hearing Board should require the following questions be answered to the board's satisfaction before determining the SVRA air quality nuisance has been fully abated:

- Once modeling shows the SOA emissions reduction goal is met, and victory is declared, how will State Parks and the APCO ensure this is maintained in future? Will the detailed emissions measurements and modeling continue, and if so, how often?
- What level of air quality standards exceedances would indicate further emission reduction measures are required to comply with the Clean Air Act?

Thank you for your service and consideration of the above comments.

Chris Sorensen
Nipomo Mesa Resident