

Hearing Board
San Luis Obispo County
Air Pollution Control District

Dear Hearing Board Members,

The new air quality metric for compliance with Stipulated Order of Abatement (Case No. 17-01) is a positive step toward dealing with the health hazards from dust emissions by the Oceano Dunes. It does meet the goals of simplicity and accuracy and shows the trend of decreasing emissions. As a chemical engineer familiar with such measurements and statistical treatment of data, I support its implementation.

However, I am concerned that using only this metric of time dependence of the CDF and Mesa2 detectors would not fully indicate the effectiveness of mitigation measures on the health effects downwind. Figure 23 shows some decline in the ratio of PM_{10} to Wind Spend, but the record shows there are still many days when the dust level exceeds healthy air quality. As long as these events continue, the ultimate objective of maximizing air quality will not be achieved. This metric would demonstrate some progress but not indicate if our ultimate health objective would be achieved.

In the report section of "Other metrics explored", the ratio of CDF PM_{10} to that at Oso Flaco is mentioned, saying its time dependence is similar to the proposed metric, though the plot is not shown. I expect this ratio is always greater than unity. What is important about these data is not their time dependence, but whether the value declines to a desired healthy level. Though the CDF/Oso Flaco ratio cannot be expected to reach unity, especially while OHV activity is allowed, monitoring the value of this ratio would more reliably indicate progress of mitigation measures. It would also meet the objectives of simplicity and accuracy.

Thus, I encourage you to establish a mitigation target for the ratio of CF to Oso Flaco particulates and monitor and publicize its time dependence to assure downwind residents that their air quality is actually being improved.

Thank you for your commitment to the health of our citizens.

Sincerely yours,
John P. O'Connell
Nipomo, CA