

Email to Hearing Board Oct. 2024

Dear Hearing Board Members and APCO Gary Willey,

I am writing to once again ask that you follow your mandate and abate the nuisance coming from the ODSVRA. Abate it as compared to real life PM10 readings, not computer models of 1939 "pre-disturbance levels". Residents on the Nipomo Mesa want air quality equivalent to the areas north and south of the ODSVRA riding areas, but not downwind. Those readings are available at the Oso Flaco monitor.

In the proposed S.O.A. Amendment, it states "To date, the modeling has excluded the northern and southernmost portions of the park, which are non-riding areas." Why is that?? The southern most area is the Oso Flaco area, and already has a monitor. Why go to the expense of attempting to re-create the 1939 air quality readings with computer modeling?? A much easier and less expensive approach was developed in 2018 and later discarded/modified by the SAG; State Parks and the APCD. Lowering the S.O.A. initial goals in 2022 was a grave error in my opinion. Mother Nature showed us she can do better and did in 2020. 46% reduction in emissions after 5 months of no vehicles on the dunes.

I do support extending the S.O.A. until 2028 as this will ensure continued study and maintenance of the existing vegetation and mitigation progress.

The "Findings and Decisions of the Hearing Board portion of the amendment states, ""The initial modeling results in the 2024 ARWP indicates that ODSVRA is not in excess of naturally occurring emissions and therefore it may be appropriate for State Parks to move towards a long-term maintenance and adaptive management program to remain in compliance with the Stipulated Order of Abatement as modified." I think this is misleading as "in excess of naturally occurring emissions" refers to a model, not the real data. It should read "the ODSVRA is not in excess of the modelled 1939 pre-disturbance emissions that did not include the northern and southernmost portions of the park, which are non-riding areas."

In conclusion, progress has been made as shown on the Figure 3 chart on page 11 of the Application to modify the S.O.A. Notice the pink line "Oso Flaco" that is below 10 State Exceedances for each of the past 5 years. That is the improvement I hoped to see, not no exceedances, but equivalent to non-riding area exceedances. Maybe by 2028 we will get there.

Sincerely,

Rachelle Toti

Nipomo Mesa resident