

February 27, 2020

Re: Oceano Dunes Stipulated Order of Abatement

Dear San Luis Obispo Air Pollution Control Board,

The Off-Highway Motor Vehicle Commission with governing authority over the Oceano Dunes is monitoring the Stipulated Order of Abatement (SOA) closely with earnestness and seriousness. The Commission holds air quality as a top priority and compliance with the SOA. The Oceano Dunes SVRA is spending just under fifty percent of the entire budget (\$3M) on monitoring, funding the SAG and the various proposed mitigations.

At our January 24, 2020 meeting representatives from the Science Advisory Group (SAG) provided a very thorough report. It has become clear that the latest dust mitigation effort that removes the 48 acres from the riding and camping area at Oceano Dunes SVRA is out of step with the process outlined in the May 18, 2018 Stipulated Order of Abatement conditions 2.b and 2.c (the amended November 2019 SOA does not supersede the original May 2018 document). The SOA clearly requires any proposed mitigations be modeled prior to implementation. The SOA also requires that in order to effectively analyze any modeled mitigations that an approved baseline must be established. Neither of these tall orders have been completed or established at this time.

In addition, the SAG has admitted that they have not determined the delta difference between the natural occurring saltation process and the inferred impact from OHV use. At this point it is a suggested theoretical impact the OHV recreation leads to more saltation generated dust when OHV recreation occurs on the subject sand dunes. While this is a reasonable deduction, the impact has not been quantified.

We are in receipt of the Scripps Institute of Oceanography Study recently released which provides interesting data relative to PM 2.5 dust. The Scripps findings appear to dramatically call into question the PM10 constituency accepted by the APCD and SAG. Scripps found that 40-60% of PM2.5 contains inert calcium carbonate, sea salt sodium chloride and various organic carbons among other natural occurring elements.

It is our fiduciary responsibility to ensure that the OHV Trust Fund expenditures are spent for OHV related impacts. While we expect to use these monies for monitoring, expert research and mitigations it appears that in the rush to seek dust mitigation the proverbial "Cart is before the Horse."

Considering these recent developments, we respectfully request that the APCD reconsider the removal of the recent 48 acres. This area has not been modeled for efficacy, the baseline has yet to be established and the recent Scripps study provides valuable data that should be incorporated into the baseline. It is imperative that the OHV Trust Fund only be used for OHV related impacts, which have yet to be established. Lastly, we would also like ensure that any and all mitigations are monitored for efficacy, including peer review of the findings.

Sincerely,