

HEALTH COMMISSION LETTERHEAD

May 2017

John Peschong, Chair, District 1
Bruce Gibson, Supervisor, District 2
Adam Hill, Vice Chair, District 3
Lynn Compton, Supervisor, District 4
Debbie Arnold, Supervisor, District 5

Re: Health impacts related to elevated levels of Particulate Matter (PM) in the Nipomo Mesa/Oceano Dunes area

Dear Supervisor:

Residents of the Nipomo Mesa who reside in the dust plume from the Oceano Dunes have again appealed to the Health Commission for help in protecting them from the on-going, unresolved, serious health consequences of exposure to airborne Particulate Matter (PM) blowing from the dunes.

Rigorous studies conducted by the Air Pollution Control District (APCD) and other research organizations unequivocally conclude that this dust originates from the Oceano Dunes (2007) and that Off-Highway Recreational Vehicles (ORV) use in the Oceano Dunes State Vehicular Recreation Area is responsible for allowing airborne transport of the dust during high winds (2010).

Science demonstrating the clear connection between ORV use on the dunes and Nipomo Mesa residents' exposure to serious health consequences from the dust has been evident for years. Yet California State Parks' efforts to respond have been very slow and ineffective to date. Most troubling is the recent removal, by State Parks, of the control site dust monitoring station at Oso Flaco, without notification to APCD or California Air Resource Board (CARB). Data from this site is essential to validate effectiveness of mitigation attempts in the riding area.

In the meantime, Nipomo Mesa residents remain exposed to very serious acute, chronic, and cumulative health impacts, which many local medical professionals agree has compromised the health of downwind residents. Strong scientific consensus holds that both short and long term airborne PM exposure cause serious lung and cardiovascular disease. There appears to be no minimum threshold for harm, and negative health effects increase linearly with increasing particulates. In large populations a clear correlation between PM exposure and mortality is evident, with mortality predictably decreasing as PM exposure is reduced.

California State Parks is currently proposing a 5 year dust mitigation project utilizing seasonal wind fencing, planting 20 acres of permanent vegetation each year, and downwind tree planting. There have been numerous delays in developing this project, which at very best will take more than 5 years to reach maturity. Its success in significantly reducing downwind dust exposure is far from certain. SLO County APCD has documented that previous mitigation efforts by State Parks have had no effect.

A soon to be completed modeling project, developed by CARB and SLO County APCD, will be used to predict success of various fencing and planting mitigation measures. It is unclear if State Parks is committed to applying the information developed by the model.

Current daily pollution forecasts published by SLO County APCD reflect the expected dust levels averaged over a 24 hour period. But on windy days the afternoon levels, when residents are most likely to be outside, can be several times higher for up to several hours. For example, between Feb 22 and April 28 this year, the Nipomo CDF monitor recorded 17 days with at least one hour in the Very Unhealthy or Hazardous range. Yet the APCD published daily forecast averaged over the 24 hour period never exceeded the Moderate air quality range. In the various forecasts the risk of severe hourly pollution, if included, is obscured in a dense, hard to navigate paragraph of text.

We recommend that the BOS respond vigorously to the significant ongoing health risks endured by our residents. At a bare minimum, a rigorous annual review of the California State Parks proposed mitigation project, with public reporting is needed.

Additionally, the Commission recommends that the APCD published daily pollution forecast be modified such that risk of exposure to shorter periods of unhealthy levels be easily identified and prominently displayed.

We appreciate your thoughtful consideration of our recommendations.

Sincerely,

Chair, County Health Commission