

December 10, 2018

California Air Resources Board

1001 I Street

Sacramento CA 95814

Re: Imperial County 2018 Redesignation Request and Maintenance Plan for the  
PM10 standard (Imperial County PM10 Plan) Hearing Date Dec. 13, 2018

My apologies for these late comments. I was not aware of the hearing date until today and was unable to download the Final Document submitted by Imperial County, so I am uncertain of the detail that may have been included in the County's document.

Nevertheless, as a resident of Imperial County since May 1977, and living surrounded by open desert and wilderness, I wish to submit some observations related to my experiences. Generally, the location where I live has excellent air quality and I can often see perhaps 30-40 miles to distant mountain ranges on both sides of the border and can see the direction of plumes of smoke from agricultural field burning once the plumes rise and travel horizontally.

However, several times this past year I have reported to CARB's Earl Withycombe what I have seen to be terrible quality air, essentially dust storms to the north and northeast of Interstate 8 west of irrigated agricultural lands. When CARB and Imperial County APCD staff have investigated, I have been told that the apparent source of poor quality air was related to off-road vehicle activity on public lands managed by BLM or the State. On October 15, 2018 I reported to Withycombe and IC APCD air quality so poor that I was unable to see the mountains less than ½ mile from my house. Staff from the local APCD investigated and informed me that Ocotillo was the only place in the County with poor quality air and the source was again off-road vehicle (ORV) activity. Given the location of off-road vehicle "open ride" areas and the proximity of these lands in relation to the town of Seeley (the IVAN air monitor was off-line that day) and the nearby densely populated Centinella State prison (no air monitor there), with its involuntary population of sometimes near 5,000 individuals, they may also have been impacted by those dust plumes. For years I have been very concerned about the public health impacts for local County residents and prison inmates created by out of county persons and the intensive use of ORVs.

As a member of the IVAN CSC for air monitoring, for several years I have repeatedly raised concerns that there should be air quality monitoring instruments placed at each of the rural state prisons. After all, it is the State of California that covers the costs of health problems experienced by prison residents. Of special concern is the knowledge that there have been reports of Valley Fever (Coccidioidomycosis), a fungal infection from inhaling fungal spores in the desert dust, cases of valley fever in both humans and dogs in the Ocotillo area in the southwest part of the County. Valley fever is well documented as a health problem at several State Prisons and the issue was so serious that the courts got involved.

Thus, based on my observations and reports of poor quality air that was not observed at any of the County/CARB regulatory air quality monitors, it is imperative that there be additional air monitors and the maintenance and calibration of monitors be improved so that there are not so many times when local community monitors are off-line. Furthermore, I question how much data, complaints, and/or satellite and/or camera images are necessary for the County and CARB to consider making formal requests of BLM and the CA Off Road Vehicle Commission to take some actions to reduce the intensity of ORV activity that contributes to poor quality air in Imperial County. The problem associated with poor air quality associated with ORV activity in the South Algodones dunes managed by BLM has been observed, especially on holidays to contribute to what must be dangerous levels of particulate matter that can be easily observed crossing the border into Baja California. Twice on Thanksgiving weekends, I have driven on Interstate 8 east of Holtville and found that there wasn't much difference between the color of the sky and the desert sand on the ground! This necessitates air quality monitoring near the Algodones Dunes, and again, a formal request that BLM consider actions to reduce particulate air pollution on winter holiday weekends. County and Mexican residents deserve better air quality on winter holiday weekends! From living in the open desert, I can assure CARB that dust does not get picked up from undisturbed desert pavement, but only from areas where the surface has been disturbed by vehicles.

Second, I would suggest that there be a consideration for eliminating agricultural burning or restricting it to locations much further away from schools and communities. Several years ago I received a late night email from a Border Patrol agent concerned by the field burning near the school when he went to pick up his daughter. He stated that the principal had told him that there was nothing she could do. I was concerned enough that I sent a late night email message to Dr. Paul English of the CDPH. The next morning Dr. English provided me with an information sheet spelling out regulations. Said sheet was copied and I asked that Border Patrol agents be provided copies and to report concerns they might see while on duty in rural areas.

For many decades, whenever we would see field burning near the interstate highway, my husband and I would turn around and return home to avoid being exposed to the smoke. Going into the valley gave him enough difficulty breathing without the additional exposure to field burning. Having lived in both Minnesota and Idaho, I do not recall seeing fields burning after harvest. Vegetative material was plowed into the soil and composted.

I know there is a high incidence of asthma and allergies in Imperial County and a high number of visits for such to the Emergency Rooms. What I do not know is if there is a direct correlation to poor quality air associated with either the ORV activity dust events or agricultural burning. If so, that is an additional reason to consider how to reduce poor quality air events associated with such activities.

Also, my observations indicate that industrial scale wind and solar projects have been major contributors to increased particulate matter arising from the sites when the wind blows. Soil stabilization efforts appear to be less than successful at such industrial sites when vegetation is removed.

Thank you for considering these concerns,

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