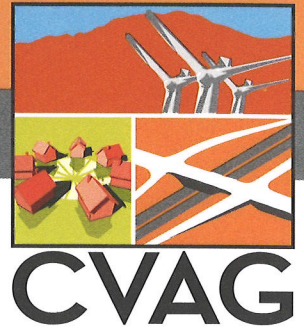


# COACHELLA VALLEY ASSOCIATION OF GOVERNMENTS

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May 31, 2024

Wayne Nastri  
Executive Officer  
South Coast Air Quality Management District  
21865 Copley Dr.  
Diamond Bar, CA 91765

Re: Air quality is not “back to normal” in the Coachella Valley and more must be done to address the horrible conditions

Dear Mr. Nastri,

On or before May 20, 2024, La Quinta resident Ron Holmes called South Coast Air Quality Management District (AQMD) staff to express a concern that is now pervasive in the Coachella Valley: our air quality is unprecedentedly horrible this Spring. According to Mr. Holmes, your staff informed him that air quality was improving, had actually returned to normal conditions and there was nothing the South Coast AQMD could do about the conditions. Instead, he was referred to the Coachella Valley Association of Governments (CVAG). I share Mr. Holmes’ opinion that air quality conditions are not normal, and I believe South Coast AQMD, along with CVAG and others, can and must do more to address the conditions.

The message your team shared with Mr. Holmes is much like the one you and your staff shared when we met on May 10, 2024. The meeting in Rancho Mirage, facilitated by Riverside County Supervisor V. Manuel Perez, you and your staff told representatives from the Greater Palm Springs Convention and Visitors Bureau and the City of La Quinta and myself that air quality is back to “normal” conditions in the Coachella Valley and there wasn’t much that South Coast AQMD could do beyond monitoring, analysis and warnings. I disagree.

After unprecedented levels of dust in August and September of 2023, I reached out to your staff to meet on October 25, 2023 with some of the same concerns that many are expressing now: Tropical Storm Hilary deposits were of a very different quality – very fine muds – than typical sandy larger diameter deposits in our stream beds and they were deposited in the headwinds along Interstate 10 in the western Coachella Valley, an area notorious for being a source for PM10. Your team was already adjusting warning systems to account for the lower wind speeds which were now kicking up dust. Your team also responded to the need to add or replace a monitor in the City of Indio. I appreciate those efforts – but they are only the start of what needs to be done. At that meeting, I expressed my grave concern that these small, clay deposits might again create horrible air quality conditions in our windy, Spring season. Your staff expressed their opinion that revegetation and winter rains would ameliorate matters and air quality conditions would return to normal. They have not.

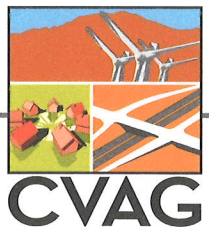
CVAG has no regulatory mandate nor statutory authority to address air quality. But due to the risk to our public health and largest economic industry, tourism, it was clear to me then and even more clear now that we must do something to address this urgent situation. With some encouragement, our cities and Caltrans responded to the potential springtime threat by applying soil stabilizer wherever possible and seeking financial relief from Federal Emergency Management Agency (FEMA), which provided funding opportunities after President Biden approved an emergency declaration associated with storm's damage. However, we must do more and do so in partnership with you and your team at South Coast AQMD. South Coast AQMD is the largest and, most would argue, most effective air district in the nation with an unambiguous regulatory role. But we cannot let a regulatory focus lead to a continued disconnect between your staff's impression of normal and our daily experiences here.

Regulatory reporting requires a 24-hour average of PM 10 to be calculated from midnight to midnight. Yet this misrepresents the reality of what people in the Coachella Valley are experiencing on a far-too-frequent basis in recent months. For example, 24-hour average from 3:00 p.m. April 24 to 3:00 p.m. April 25, 2024, was 492 ug/m<sup>3</sup> at the South Coast AQMD's new monitoring station in Indio. Those two April afternoons also coincided with some of the busiest times in the desert, when thousands of visitors are headed to the desert. April 24 was the ramp up to the Stagecoach Music Festival, and one of the largest country music festivals in the world. About 75,000 festival goers were traveling to the desert and spending the majority of their time outdoors. Tens of thousands of festival-related workers join the ranks of the tens of thousands in the desert who are already working outside. PM 10 data recorded for April 24 showed one-hour averages of 675, 765, 688, 1126, 759, 1126 and 1250 ug/m<sup>3</sup> from 3 p.m. to 9 p.m., respectively. April 25 also had considerable poor air quality between 6 a.m. and 3 p.m., with the highest 1-hour average of 639 ug/m<sup>3</sup> at 2 p.m. Barely a month later, on May 24, the Coachella Valley experienced yet another poor air quality day with 1-hour PM 10 readings of 298 at the Mecca monitoring station at 5 p.m., when people are coming home from work and children are playing outside.

Because these high levels did not coincide with a midnight-to-midnight 24-hour period, these days might go unreported as an exceedance of federal air quality standards. However, these concentrations represent severe exposure across two afternoons and evenings, exposing residents and visitors to hazardous air quality conditions. For those not in the desert, they might not realize what those dusty afternoons look like: school activities being brought indoors; people pulling out those COVID-era masks just to make a trip to the grocery store; co-workers and friends coughing and sneezing uncontrollably; and a thin layer of dust covering cars, roads, patios and everywhere else you look outside. The impacts to the public's welfare are clearly noticeable as aerosolized particles produce a persistent haze that is visible long after winds have died down. Given the welfare effects of reduced visibility, the California Air Resources Board (CARB) established ambient air quality standards for visibility reducing particles to protect public welfare in addition to the Clean Air Act's health based PM10 standards.

The time for action is now.

Stakeholders throughout the Coachella Valley – including residents, business owners, and health professionals – are urging us to take more action over the noticeably worse air quality, which is unlike anything experienced in previous years. I recommend that the South Coast AQMD consider at least the following steps:



- *Re-evaluating its position that conditions have returned to normal:* Perhaps through the lens of whether our air basin is in compliance or not with Federal and State rules, conditions this Spring may seem similar to previous periods. Yet even the data presented by South Coast AQMD's on May 2, 2024 demonstrated that the PM10 levels for six of the nine months after Tropical Storm Hilary were higher than the averages routinely seen at the Mecca and Palm Springs stations before the storm. As we have shared, the nature of the dust in the air and into our lungs is very different too, much smaller and easily aerosolized. South Coast AQMD staff's expertise can be employed to understand if dust is in fact "smaller" than in past years and thus more dangerous.
- *Fully participating with the Desert Healthcare District/Foundation (DHCD) and regional efforts to understand and address the health impacts from this air quality:* These efforts will help raise awareness and build a coalition of partners to better understand facts and data, as well as identify additional data needed to help determine implementation strategies to improve air quality related health outcomes for Coachella Valley residents and visitors. DHCD is holding a listening session at 10 a.m. on June 4 at the Regional Access Project Foundation, located at 41500 Eclectic Street in Palm Desert.
- *Partnering with CVAG to develop a methodology to prove, or disprove, that the source area for much of the fine particles are the approximately 6,000 acres of mud deposits from Tropical Storm Hilary:* Such an analysis could potentially support efforts to continue to use FEMA funding for mitigation and/or prevention.
- *Joining with CVAG to evaluate the efficacy of the soil stabilizers that were applied post-Hilary:* Based on the data, we could develop a methodology and approach for applying additional soil stabilizers across the region. I also encourage the South Coast AQMD to help us identify funding to support these efforts.

Many of us share La Quinta resident Mr. Holmes' opinion that our air quality conditions post-Hilary are not "normal." I look forward to hearing from your team, which has already agreed to attend CVAG's Energy and Sustainability Committee meeting at noon on June 13. I also stand ready to work with you to address this persistent threat to public health and our economy.

Sincerely,



Tom Kirk  
Executive Director

CC:

V. Manuel Perez, 4<sup>th</sup> District Supervisor, County of Riverside  
CVAG Executive Committee  
CVAG Energy and Sustainability Committee  
Scott White, President & CEO, Convention and Visitors Bureau  
Chris Christensen, CEO, Desert Healthcare District & Foundation

