



Concerned Citizens for Clean Air

Dear Hearing Board Members,

Concerned Citizens for Clean Air (CCCA) welcomes the new Hearing Board members and urges the Board to make public health the primary focus of the Stipulated Order of Abatement. CCCA submits the following thoughts and comments concerning the 2026/2027 Draft Annual Report and Work Plan.

The first thing to remember about the Annual Report and Work Plan (ARWP) is that its announcement that the SOA goal has been met is based on “Modeled” data. The metric tons per day figures in Table 2-7 are “modeled”, not actual readings. The 1.9 metric tons per day margin of compliance is also “modeled” not actual readings. In the Air Pollution Control Officer’s letter dated September 3, 2026 on page 2, he points out “future modeling updates will change the emissions estimates, possibly yielding the opposite result i.e. demonstrating non-compliance”.

Secondly, the residents of the Nipomo Mesa are still subject to frequent Air Aware Alerts, and levels of particulate matter, not seen anywhere else on the California coast. Additionally, our monitors at CDF and Mesa 2 often show poorer air quality than the rest of the nation. See attached AirNow charts for September.

Have improvements been made? Yes, but the work stopped in 2022, when State Parks decided the “model for that year” achieved the SOA goals. Since 2022, only backfilling of plants that have not lived or gotten buried by sand encroachment, is occurring. So, while the report claims that 710 acres of vegetation planting has been done, it does not report how many of those acres are bare sand where plants have died.

The Foredune Project is another concern. The ARWP indicates that one of the test plots has demonstrated the best overall restoration. It is time to move on and start to apply this approach to restore all of the SVRA foredunes to their natural condition.

In this ARWP it mentions a change to the modeling that would increase the areas considered non-emissive. Last year, an acre with 50% vegetation cover, was considered non-emissive. Now the plan is for an acre with **only 15% vegetation** cover to be considered non-emissive. Why is this change necessary? Is it appropriate? Does it work to protect public health or does it work to tip the scale toward less mitigation?

Attached is a simple graph of the State Exceedances for 2021, 2022, 2023, 2024, 2025, and 2026 (to date). Notice that in all of these years, the Oso Flaco monitor reads 8 or lower. The CDF and Mesa 2 monitors are both double digits for all years. We have repeatedly stated that the air quality, while improved, is nowhere near the Oso Flaco level, or the level of when the park was closed due to COVID. Oso Flaco is subject to the same wind and blowing sand as the other two monitors. It should be included in the review process because it is an example of what the background level of actual emissions are. Not what is “modelled” and changed from year to year.

Last year, the Hearing Board was shown a “SAG metric” for actual emissions. We are told this metric will be presented at the October 14th hearing. We hope so.

The APCO letter also states “Currently, certain areas are modeled as non-emissive even though they have not achieved the level of vegetation coverage needed to suppress dust generation.” Here is a clear example of using incorrect data to achieve a desired outcome. The Hearing Board has the ability to request a second analysis that follows the actual provisions of the SOA. This type of manipulation may very well have produced a premature declaration of meeting the goal in 2022. Are we to wait until 2028, to find out that more mitigation is needed?

Concerned Citizens for Clean Air agrees with the APCO’s comments concerning the need for new dust controls, an increase in the “compliance buffer” and achievement of the goal by the 2028 deadline.

Thank you for the opportunity to submit our comments.

Concerned Citizens for Clean Air
Rachelle Toti and Arlene Versaw,
Co-founders
and the Steering Committee Members

cc: Karl Tupper, Air Pollution Control Officer

Air Quality State Exceedances 2021 to 2026

Year	CDF	Mesa 2	Oso Flaco	
2026	31	12	0	(Jan 1 thru Sept. 30)
2025	25	16	3	
2024	16	16	4	
2023	27	19	7	
2022	59	44	7	
2021	41	40	8	

- All numbers were counted from the AQMIS PM10 BAM annual charts by Rachelle Toti

Highest NowCast AQI Locations

This is a list of Reporting Areas with the highest current Air Quality Index (AQI) values. Ozone and particle pollution monitors across the country report current air quality readings to AirNow around the clock. The AirNow system generates a list of where the AQI for ozone or particle pollution is currently the highest at any given hour; this list automatically updates hourly, so the list changes several times day.

[Nipomo Mesa2, CA](#)

297

[Nipomo CDF, CA](#)

247

[Santa Maria, CA](#)

245

[Memphis, TN](#)

100

[Santa Clarita Vly, CA](#)

97

[Nipomo, CA](#)

88

[Carlsbad, NM](#)

84

[E San Gabriel Vly, CA](#)

84

[W San Gabriel Vly, CA](#)

84

[E San Fernando Vly, CA](#)

80

Highest NowCast AQI Locations

This is a list of Reporting Areas with the highest current Air Quality Index (AQI) values. Ozone and particle pollution monitors across the country report current air quality readings to AirNow around the clock. The AirNow system generates a list of where the AQI for ozone or particle pollution is currently the highest at any given hour; this list automatically updates hourly, so the list changes several times day.

[Nipomo Mesa2, CA](#)

271

[Nipomo CDF, CA](#)

227

[Santa Maria, CA](#)

184

[Carlsbad, NM](#)

93

[Nipomo, CA](#)

87

[Santa Clarita Vly, CA](#)

87

[Nashville, TN](#)

84

[Memphis, TN](#)

80

[Fort Collins, CO](#)

71

[Paducah, KY](#)

71