

APCD_slocleanair

From: Chris Sorensen <cwsorensen99@hotmail.com>
Sent: Monday, October 11, 2021 8:10 PM
To: boardclerk@slocleanair.org
Subject: [EXT]Comments for the October 14 Hearing Board Meeting and Workshop

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The following comments are provided to supplement the comments I submitted on October 6:

The workshop version of the ARWP is an impressive dune dust research report. It demonstrates that State Parks has invested very significantly in monitoring, modeling and analysis efforts. Unfortunately, State Parks, the Scientific Advisory Group and the Air Pollution Control Officer (APCO) seem to have lost sight of the purpose of this effort, that is, significantly reduce the public health danger as quickly as possible. The work plan does not convey any sense of urgency. State Parks' modeling and monitoring clearly shows that at the current rate of dust controls implementation, the 50% mass emissions reduction objective will not be met by end of 2023. **It is, therefore, also not likely that PM10 concentrations will meet the legal air quality standard.**

State Parks has from the beginning of the SOA stated that their dust control program strategy is "adaptive management". Analyze, model, implement, monitor, adapt. State Parks has adapted their models, but have not reflected the results in the proposed 2021 work plan. The 90 acres of dust controls installed the past two years, and proposed for next year, is clearly inadequate, according to the modeling and analysis of results achieve so far. **Adaptive management does not work if you don't apply what you learn and adapt the work plan accordingly.**

The 2021 ARWP states that latest modeling indicates that 602 acres of dust controls will be needed to achieve 50% mass emissions reduction. As of July 31, 2021 a total of 322.5 acres of controls have been installed, leaving about 280 acres yet to be installed. The proposed 90 acres of dust controls in 2022 would leave 190 acres to be installed in 2023, the last year of the current Stipulated Order of Abatement. It is not credible that State Parks would/could do this, given their past history and this year's inadequate work plan.

The modeling of emissions reduction achieved to date, and estimates of total dust controls needed to meet the 50% reduction goal are based on the dust control effectiveness of fully mature vegetation. **It would be miracle for the vegetation installed in 2022 and 2023 to achieve full effectiveness by windy season of 2023.**

Does the SAG, APCO, and State Parks truly believe the SOA requirements can be achieved by the end of 2023 given the conditionally approved draft 2021 work plan? **At the very least, the APCO or Hearing Board should require all of the estimated 602 acres of dust controls be installed by July 31, 2023, and for State Parks to continue to maintain this level of controls thereafter.**

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