

APCD_slcleanair

From: Chris Sorensen <cwsorensen99@hotmail.com>
Sent: Wednesday, October 6, 2021 6:49 PM
To: boardclerk@slcleanair.org
Subject: [EXT]Comments for the October 14 Hearing Board Meeting and Workshop

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Hearing Board Members and Gary Willey (APCO),

The ARWP, especially after State Parks responded to SAG's first draft comments, is an impressive document. It demonstrates that State Parks has invested in very significant monitoring, modeling and analysis efforts. Too bad the work plan does not show the same level of commitment to achieving actual emissions reduction as required by the Stipulated Order of Abatement.

It is now three years since the SLO County Air Pollution Control District (APCD) Hearing Board ordered State Parks to reduce dust emissions from the Oceano Dunes State Vehicular Recreation Area by 50%. The 2021 Annual Report and Work Plan (ARWP) prepared by State Parks states that 322.5 acres of dust controls have been completed, while these controls will reduce emissions by an estimated 20.6%. After three years, State Parks is less than half way to achieving the ordered the dust reduction. That is not good enough.

The 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, not likely that the mandated 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 proposed for 2022 is clearly inadequate, according to the monitoring and modeling work to date. Adaptive management does not work if you don't apply what you learn and adapt the work plan accordingly. State Parks is actually following a strategy of adaptive procrastination.

The 2021 ARWP states that latest modeling indicates that 602 acres of dust controls will be needed to achieve 50% mass emissions reduction. That leaves about 280 acres yet to be installed. The proposed 90 acres for 2022 would leave 190 acres to be installed in the last year of the current SOA. And, it will take some considerable time after that for the recently planted vegetation to have full effect. 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? Very doubtful, yet 2021 ARWP has been conditionally approved by the APCO. This is incredible.

The APCO should require the at least 140 acres to be installed in 2022, and the entire 602 acres by July 31, 2023. If this does not happen, the Hearing Board should formally order it to be done. This is within the Hearing Board's power and responsibility. After that, we will have to wait for nature to finish the job.

Chris Sorensen
919 Lilly Court
Nipomo, CA 93444

H: (805) 343-1563
M: (805) 931-1608

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.**

*Chris Sorensen
919 Lilly Court
Nipomo, CA 93444*

H: (805) 343-1563

M: (805) 931-1608