



## *Concerned Citizens for Clean Air*

September 20, 2024

Sent via email

Dear Hearing Board members,

As the years pass since the dunes dust issue was identified, innumerable hours and dollars have been spent trying to balance meeting regulatory requirements, health issues and recreational use. There is no doubt that simply closing the park would have resolved this issue easily, recently demonstrated by the COVID-induced park closure in 2021. But here we are - and the need for further mitigation continues.

What follows are the Concerned Citizens for Clean Air comments on the current ARWP.

First and foremost, an extension of the Stipulated Order of Abatement is needed to continue monitoring progress in meeting the SOA goals. Although particulate matter emissions have been reduced, they are not near the level seen at the Oso Flaco monitor or the emission level present during the COVID park shutdown.

More validation of the modeling is needed. The draft ARWP attachments Figure 2-31 and page 2-78 indicate that large sections of the SVRA still show emissions well above the pre-disturbance level. The correlation between PM mass emission reduction and actual measured fugitive dust concentrations have not been demonstrated.

The foredune project should be restored to its natural vegetation and made permanent.

Furthermore, the report should be summarized in language that the public understands. While scientists and professional air quality experts can absorb the information, outside interested parties cannot easily. Our suggestion: Include in layman's language:

- A summary of why the foredunes project was deemed important
- A summary of the goal(s) the foredunes project was intended to achieve and how these goals relate to sustained attainment of ambient air quality standards
- A summary of when the foredunes project is projected to be "complete," including a summary of how that point in time would be verified
- A summary explaining how far along the project is toward the completion goal
- A summary that explains the process for assessing the success or failure to date associated with each of the several planting areas, and whether any changes will be made to enhance some and let others go based on "non-performance."

We look forward to your consideration of our comments and to your responses to this input.  
Thank you.

Sincerely,

Rachelle Toti, Arlene Versaw and the CCCA Steering Committee

Cc: Gary Willey, Air Pollution Control Officer