



Concerned Citizens for Clean Air

October 11, 2021

Dear APCO Gary Willey and Hearing Board Members,

After reviewing the draft 2021 Annual Report and Work Plan, Concerned Citizens for Clean Air is more concerned than ever about State Park's insufficient commitment and urgency for meeting the goals of the Stipulated Order of Abatement that it agreed to in 2019.

State Parks has from the beginning of the SOA stated that its dust control program strategy is "adaptive management": Analyze, model, implement, monitor, adapt. State parks has adapted its models, but has not reflected the results in the proposed 2021 work plan. The 90 acres of dust controls installed just this April and- proposed for next year is clearly inadequate, according to the modeling and analysis of results achieved so far. Adaptive management does not work if you don't apply what is learned and adapt the work plan accordingly.

With two years to go, the number of acres proposed for this year is too little, too late. The 2021 ARWP states that the latest modeling indicates that 602 acres of dust controls will be needed to achieve 50% mass emissions reduction. As of July 31, 2021, -322 acres of controls have been installed, leaving 280 acres to be installed in the last two years of the SOA.

CCCA strongly recommends the APCO take a serious look at what remains to be accomplished. This plan should include no less than 50% of the 280 acres needed to meet the SOA goal. Further, all future mitigation must be located in the **most emissive areas**. That has not been the case in the past two years. Continuing to "provisionally, conditionally approve" deficient plans is not a winning strategy.

Hearing Board members are being given this presentation as "information". To really measure the progress being made or not made, a hearing on the progress to date may be needed. Wisely, this was provided for in the modified agreement. Within seven days after the October 14th public meeting, - the APCO Mr. Willey shall approve the draft work plan with or without additional conditions.

In the event he approves this deficient plan, we urge the Hearing Board Members to take the next step and convene a hearing. Let us not forget that human health is behind this entire effort. Protecting the public is the primary function of the Air Pollution Control District and the Hearing Board.

Sincerely,

Arlene Versaw and Rachelle Toti
Co-founders of CCCA

cc: Edie, Chang, Deputy Executive Officer, California Air Resources Board
APCD Board Members



Concerned Citizens for Clean Air

June 16, 2021

Dear Mr. Willey,

Last year during the Annual Report and Work Plan submission and approval process, CCCA patiently waited for substantial progress in the dust mitigation efforts. There were several indicators that were encouraging, fewer number of hours exceeding 300 micrograms being one. In 2020, we were hoping for a noticeable impact from the 48-acre foredune project. In the 2020 draft ARWP, State Parks presented four options, all containing mitigation outside the riding area. You approved the option of 64 acres of mitigation inside the riding area and 26 acres outside the riding area. That mitigation was delayed until late this spring instead of being installed in November 2020. Some of that delay was approved by you.

In 2021, there has been a large increase in the number of hours exceeding 300 micrograms. 2020 had three and so far, this year we have had 12 a fourfold increase. The local newspaper reported the drop from 21 in 2019 to 3 in 2020 was partially attributed to the foredune project and other mitigation. We believe you also made this statement in an APCD Board meeting. It appears the hope of seeing substantial progress was premature.

This year we are conveying our concern in advance of the receipt of the Annual Report and Work Plan. The increase in hours over 300 micrograms is an indication that the current amount of mitigation is not adequate. Further, we are about half way through the Stipulated Order of Abatement's four-year time frame. Approving small amounts of mitigation in the most emissive areas has put the possibility of achieving the needed reduction in air pollution specified in the SOA in jeopardy. This year, substantial acreage needs to be closed and restored to native vegetation in order to meet the goal of reaching the State standard.

Below are the number of State Exceedances for PM 10 by monitoring site for our area and downtown Los Angeles to date.

CDF = 26

Mesa 2 = 28

Oso Flaco = 5

Los Angeles (Main Street) = 2

We have five times the State Exceedances as the control site (Oso Flaco). We are not even close to achieving background levels or the State standard. Nipomo is regularly in the top 10 areas with the highest hourly pollution levels in the country.

This letter is also being sent to the Scientific Advisory Group. As Ian Anderson has stated that group "advises" State Parks and your office. They do not make the final decision on mitigation, you do. While they are the experts, and seem to know what needs to be done, their support for the meager mitigation options submitted last year is disappointing. We can only hope that they come up with better suggestions to State Parks for 2021/2022. If they do not, it is your job to protect the public health and strengthen the mitigation.

As always, we will be looking forward to the release of draft ARWP in August. We would hope to have a plan that will reach the SOA's goal by 2023.

Sincerely,

Arlene Versaw and Rachelle Toti
Co-Founders of CCCA

Cc: Scientific Advisory Group