

Peggee Davis

After reviewing the Draft Annual Report and Work Plan and I noted that, as has been the case for the past four years, no new vegetation planting is proposed. With only two years remaining before the Stipulated Order of Abatement expires, we would appreciate clarification about the plan for vegetation during this period. Will the focus continue to be on replacing vegetation that has died or has been covered by sand?

While replacing lost vegetation is important, filling in areas where previous plantings have been lost does not appear to increase the overall amount of vegetation or address the larger air-quality concerns. We encourage consideration of additional measures that could provide further improvement during the remaining two years.

Here are several points we believe are important to consider:

- **Air-quality exceedances**

In 2026 to date, the CDF monitor has recorded 31 state air-quality standard exceedances, while the Mesa 2 monitor has recorded 12. The 31 exceedances at CDF are higher than the number recorded in each of the previous three years—2023, 2024, and 2025. The attached chart illustrates this information.

Given these results, we would appreciate clarification on how the current approach is demonstrating improvement in air quality.

- **Air-quality conditions on September 13, 2026**

On September 13, 2026, air quality in the area was reported as the worst in the nation for several hours, according to the attached AirNow charts. There have also been other dates when the CDF and Mesa 2 monitors ranked among the highest locations reported by AirNow. These results raise questions about whether additional steps could be taken to reduce particulate emissions.

- **Use of modeled emissions**

The Air Pollution Control District and Hearing Board currently rely, in part, on modeled emissions and modeled reductions in tons of particulate matter emitted per day.

We recognize that modeling can be a useful tool for evaluating air quality. However, modeled reductions do not necessarily demonstrate that emissions above naturally occurring levels have been eliminated.

The Oso Flaco monitor may provide useful information for establishing naturally occurring conditions because there is no riding in the immediate vicinity of that monitor. We encourage consideration of the Oso Flaco data in the Annual Report and Work Plan as part of the effort to better understand naturally occurring particulate levels. The attached chart shows the state exceedances.

- **Proposed change to vegetation coverage**

The draft Annual Report and Work Plan proposes changing the percentage of vegetation cover considered non-emissive from 50% to 15%.

Under this approach, an area with 15% vegetation cover and 85% bare sand could be modeled as having zero emissions. There are concerns about this change and believe it deserves further discussion and review.

Our goal is to support an approach that produces measurable improvements in air quality and provides meaningful, long-term results before the Stipulated Order of Abatement expires.

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Peggee@mac.com