To: Air Pollution Control District's Hearing Board.

All though some progress has been made in air pollution reduction, at the current pace we will not achieve the SOA agreement by the end of 2023. I advocate a sense of urgency and integrity in that parties should live up to their agreements.

As I write this note at 5PM on Oct 11, 2021, I observe that the APCD website states the PM10 reading at CDF is 190 and at Mesa2 is 194. These are in the Unhealthy region and very close to the Very Unhealthy region. The PM 2.5 readings are similarly bad. Residents are having their lives shorten because of lack of diligence by Parks and the APCD in enforcing the intent of the Stipulated Order of Abatement. I have already lost one friend to a lung disease. That is enough.

It is clear in the 2021 report that the number of acres installed to date and proposed for 2022 will not be enough to reach a 50% emissions reduction. Section 3.2.3 on page 3-21 shows 189.6 **more** acres of dust controls will be needed in 2023. Plants need some time to grow. Installing dust controls at the end of 2023 won't achieve the 50% reduction goal by the end of 2023. All of the required acreage should be fenced off and planted by the end of 2022.

The APCO should determine that the draft Work Plan is not approvable (i.e., the proposed mitigation is plainly inadequate). The APCO should impose conditions on the draft Work Plan to ensure that mitigation will be adequate to achieve the SOA's requirements. If this doesn't happen, I request that the Hearing Board exercise its authority under Paragraph 12 of the Modified Order to convene a public hearing to review State Parks' progress and potentially revoke (and modify) the APCO's approval actions.

Mr. Willey may need to be reminded that he works for an Air Pollution <u>Control</u> District whose goal is to achieve good air quality. It is time to enforce the SOA. Forget about weakening it.

Richard P. Wishner

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