



DEPARTMENT OF PARKS AND RECREATION

Off-Highway Motor Vehicle Recreation Division

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Sacramento, California 94296-0001

Armando Quintero, *Director*

March 15, 2024

Gary,

On December 19th, 2023, State Parks received the 'Updated Emissivity Grid Recommendations' from the Scientific Advisory Group (SAG) for the Oceano Dunes State Vehicular Recreation Area (ODSVRA) air quality program. This recommendation is to address the amended target of the Stipulated Order of Abatement (SOA), which states that State Parks will '...eliminate emissions in excess of naturally occurring emissions from the ODSVRA that contribute to downwind violations of the state and federal PM10 air quality standards.'

As per the 2023 Annual Report and Work Plan (ARWP) conditional approval letter from October 18th, 2023, "by March 15, 2024, State Parks shall present to the SAG and District, emissions estimates for both the ODSVRA as currently configured and the 1939 pre-disturbance scenario. These estimates shall incorporate the modeling assumptions approved by the APCO."

The recommendation from the SAG included the following:

- In the model, ODSVRA is to be divided into emissivity zones based on location (non-riding area north, riding south, etc) instead of using the 20m by 20m grid that had been used in the past
- All Pi-Swirl data from 2013 to 2022 will be used for both the current and pre-disturbance modeling scenarios
- The median will be used to characterize the emissivity in the zones for both the current and the pre-disturbance scenarios

As per previous iterations of the model, the current emissivity of the dunes was to be compared to the pre-disturbance scenario to determine compliance with the SOA. The pre-disturbance scenario was to be based on the non-riding area emissivity overlaid on the riding area.

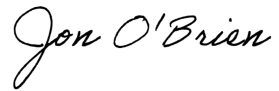
State Parks has been working with the Desert Research Institute (DRI) and the SAG to implement the modeling scenario. As per the attached memo, "the results indicate that the pre-disturbance landscape had a modeled emission of 166 metric tons per day whereas the current landscape had a modeled emission of 148 metric tons per day, with a difference buffer of 18 metric tons per day."

Therefore, the results indicate that State Parks is NOT in excess of naturally occurring emissions and is therefore in compliance with the amended SOA.

The 2024 Annual Report and Work Plan (ARWP) will address outstanding items including expanding the modeling domain to include the entirety of ODSVRA to be consistent with the SAG recommendation. In addition, there will be additional Pi-SWRL campaigns throughout ODSVRA in May and October of 2024 that will inform the air quality program.

State Parks looks forward to continuing to work with the APCD and the SAG to address particulate matter levels downwind of ODSVRA.

Sincerely,

A handwritten signature in black ink that reads "Jon O'Brien". The signature is written in a cursive, flowing style.

Jon O'Brien
Oceano Dunes SVRA Dust Program Project Manager