

# **Revised Proposal for 2020 Dust Control Projects**

**January 31, 2020**

The California Department of Parks and Recreation (CDPR, Department, State Parks) agreed to implement the amended Stipulated Order of Abatement (SOA) at a hearing of the San Luis Obispo Air Pollution Control District (SLO APCD/APCD) Hearing Board on November 18, 2019. This document focuses on two requirements of that amended SOA requiring the Department to propose locations for a permanent dust control area of 4.2 acres (per condition #4) and 40 acres of seasonal dust control projects (per condition #3).

At a meeting with the Scientific Advisory Group (SAG) on December 12 and 13, 2019, State Parks discussed these projects and agreed to propose initial projects that could be updated or amended based on new versions of the Desert Research Institute computer model. The computer model will be updated in February 2020 with new meteorological and emissions data from an intensive effort during 2019. The SAG agreed that State Parks should propose initial sites per the deadlines in the amended SOA but that those sites should be evaluated using the updated computer model and could be revised based on that evaluation.

State Parks submitted an initial proposal on December 31, 2019 and received a response from the SAG on January 15, 2020 and from the APCD on January 21, 2020. The APCD letter requires clarification and additional information on the proposed treatment areas including:

1. The APCD approves the location and treatment for the 40 acres of seasonal dust controls (treatment areas 1 and 2) but requires justification for the additional time needed to install the surface treatment.

CDPR Response – In 2015, 2016, and 2018 State Parks installed 40 acres or more of seasonal wind fencing for the spring wind season. Those fence installations required a significant investment of staff time, equipment, and labor from external sources (usually California Conservation Corps). They also required a minimum of 6-8 weeks of work to complete. State Parks has examined our workload and evaluated other sources of labor and equipment needed to conduct this work. We anticipate completing the installation of the perimeter fence by the March 15 deadline and completing the wind fencing by the April 1 date, as specified in Condition 3.ix.

CDPR has included a detailed weekly schedule of all ongoing work tasks for our maintenance crews and heavy equipment through May 2020. This schedule includes all currently known regulatory requirements for the first four

months of 2020. This includes fencing to protect endangered species, wind fencing near residents on Strand Way, and all activities required as part of the amended SOA. Please refer to Table 1 for a detailed weekly schedule of activities.

2. The APCD requires a revised proposal for the 4.2 acres of permanent treatment which either discusses the rationale for selecting the project (Treatment Area 3 in the initial proposal) or evaluating moving the project west and contiguous with the existing 9.1 acre vegetated island.

CDPR Response – CDPR has considered the recommendation to move the 4.2 acre treatment area further to the west per the APCD’s recommendation. Please refer to Figure 1 for a revised treatment area for this 4.2 acre site. The treatment site has moved to the west and is contiguous with the vegetation island installed during the 2017/18 planting season. CDPR attempted to capture emissive areas that were identified in the DRI computer model run while still allowing for safe passage of the public between the existing vegetated and fenced areas. This proposal meets multiple objectives to provide for effective treatment of areas that contribute to downwind dust while still facilitating safe public access through the area.

3. The APCD requires a revised proposal that includes a plan to evaluate the location of the proposed 4.2 acre permanent treatment under the updated DRI emissions model. If the DRI model shows that the magnitude of dust emissions reduction from this area is substantially lower than would have been achieved in the location designated in the amended SOA, then Parks should also propose a remedy to bridge the gap toward achieving the desired total dust control effectiveness.

CDPR Response – CDPR will work with Desert Research Institute to run the 4.2 acre treatment area through the model once it is updated with information collected during the 2019 field season including the updated PI-SWERL, surface weather monitoring stations, and upper air data. DRI is currently on track to complete the updated model in February 2020. Depending on the results of this analysis, CDPR may propose additional dust mitigations or propose another area for treatment within the SVRA to meet the emission reductions modeled from the area identified in the Initial SOA. State Parks will coordinate with the APCD and SAG on appropriate treatments to meet the dust control effectiveness as outlined in the amended SOA.

State Parks can commit to having all three treatment areas closed to the public by *March 15, 2020* and all surface treatments by *April 1, 2020*, subject to delays caused by weather, mechanical failure, labor shortages, or other regulatory requirements related to endangered species protections.

### Review and Revision

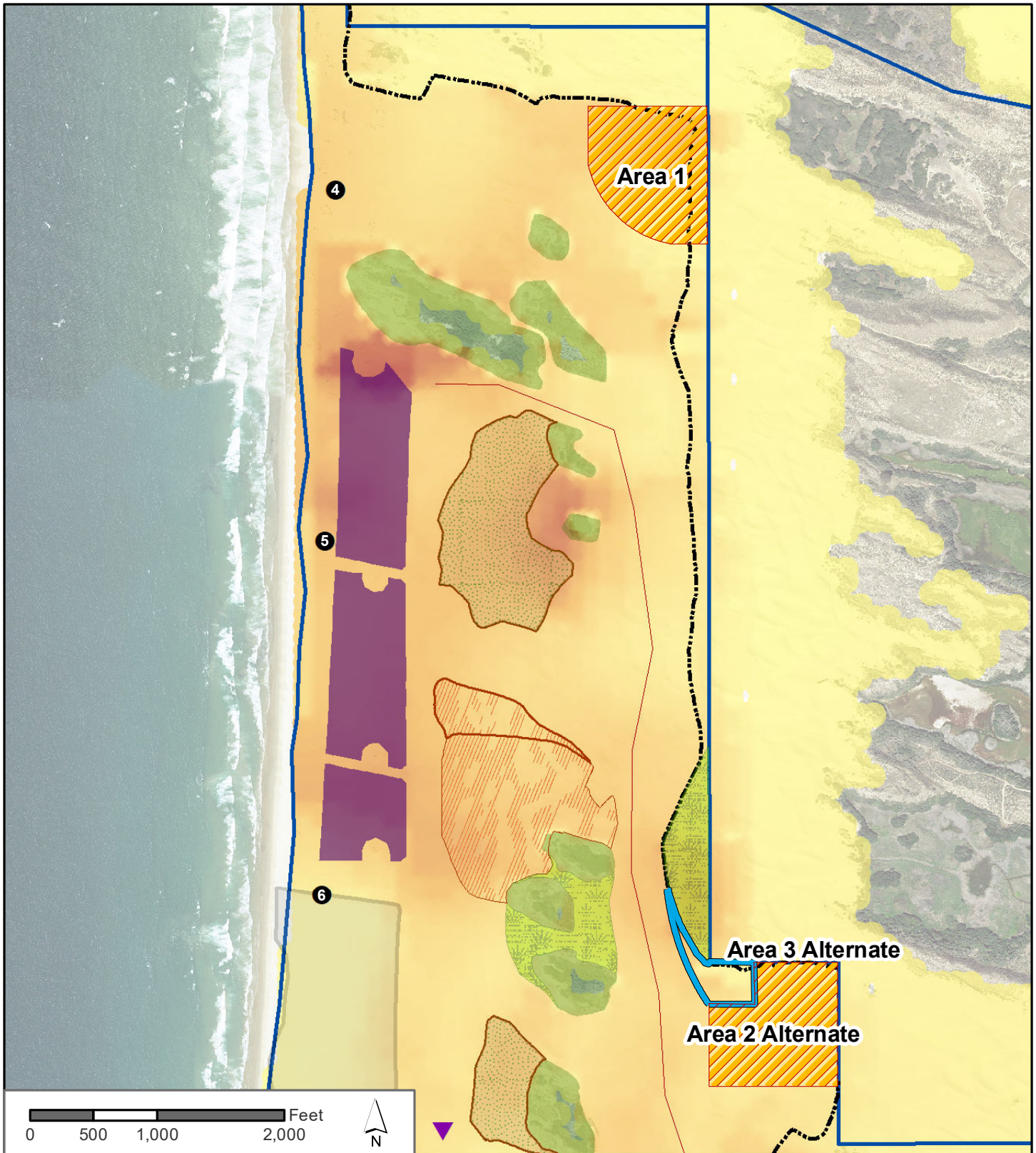
Once the Desert Research Institute computer model is updated (Scheduled for February 2020), the Department will work with the SAG to run the proposed treatment areas through the model and determine if the projects help to meet the objectives of the original and amended SOA's. Other areas will be evaluated to determine if they can better meet the objectives of the SOA's and, if that is the case, the Department will work with the SAG to identify alternate treatment locations. All treatment areas (current or proposed new) will be evaluated based on a number of dust control and operational criteria to make sure they can achieve project objectives while providing for public access and safety within the SVRA.

Table 1 – Schedule for Key Park Activities

Schedule for Key Park Activities																	
		Jan		Feb		March				April				May			
Activity	Duration	27 - 31	3 - 7	10 - 14	17 - 21	24 - 28	2 - 6	9 - 13	16 - 20	23 - 27	30 - 4	6 - 10	13 - 17	20 - 24	27 - 31	4 - 8	11 - 14
Install Seasonal Plover and Tern Enclosure	January 27 - March 6																
Install Surface Treatment for 48 Acre Foredune	One Week TBD																
Install Perimeter Fence for 40 acre and 4.2 Acre Sites	February 17 - 28																
Install Wind Fencing at Strand Way Area	March 9-12																
Install Surface Treatment for 40 Acre Wind Fence	February 24 - April 1																
Install Surface Treatment for 4.2 Acre Site	March 23 - April 1																
Maintenance of Initial SOA Wind Fence Areas	April 1 - May 14																

Ongoing

Completion



Source: CDPR, Desert Research Institute

1/31/2020

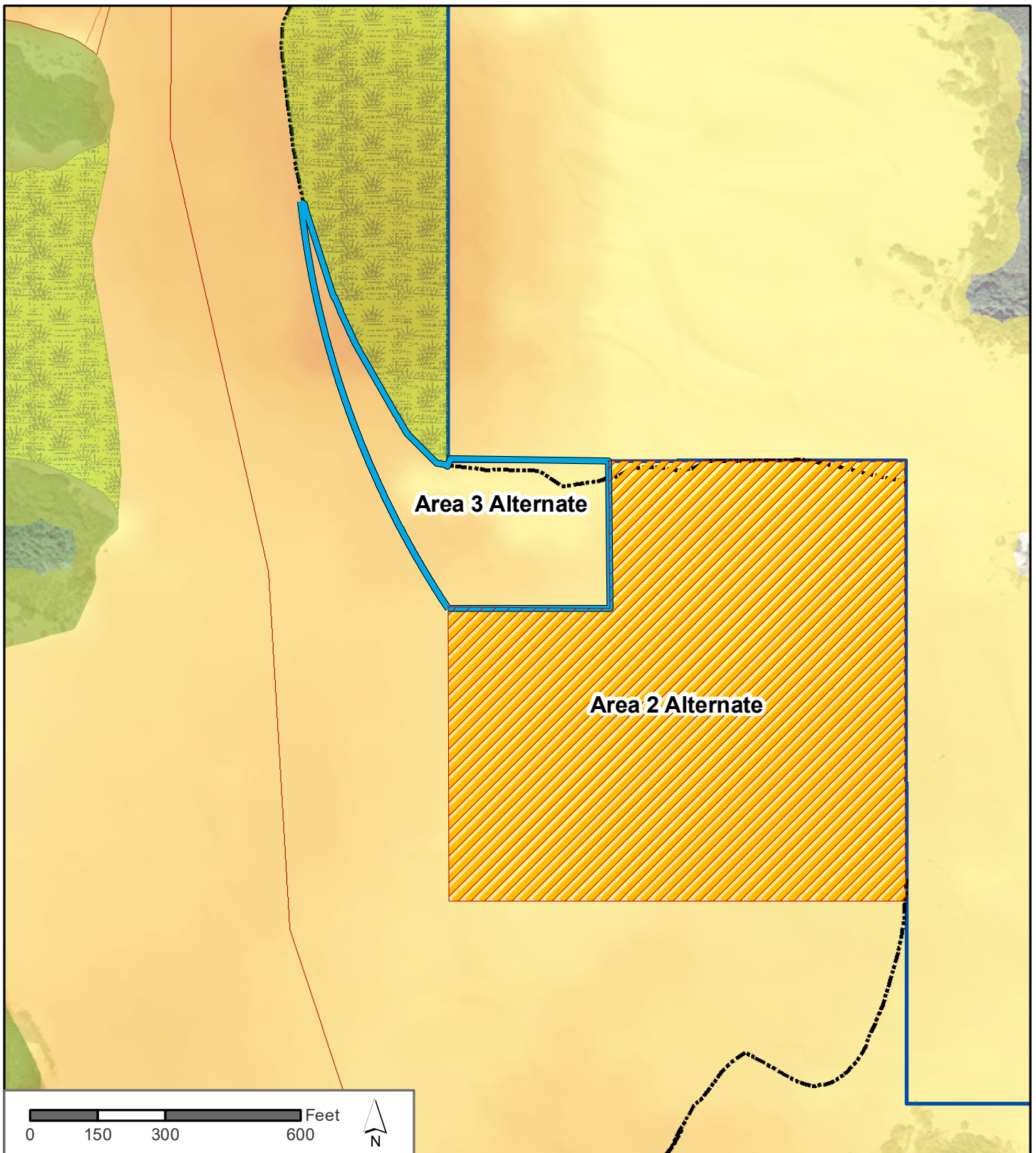
- 4.2 acre permanent restoration
- Seasonal wind fencing/dust control (40 acres)
- 2019 Foredune restoration (48 acres)
- Initial SOA wind fencing projects
- Initial SOA straw bales/restoration
- Pre-SOA vegetation project (2014 and 2017)

- Existing fenced vegetation islands (186 acres)
- Sand Highway, approx.
- Marker post
- Open riding and camping area boundary fence
- Nesting enclosure
- Park boundary



**2020 Dust Control Proposed**  
Oceano Dunes SVRA 2019





Source: CDPR, Desert Research Institute

1/31/2020

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