

February 14, 2020

Memo: SAG Comments on the Revised Proposal for 2020 Dust Control Projects

From: The Scientific Advisory Group (SAG)

To: Jon O'Brien, California Department of Parks and Recreation
Liz McGuirk, California Department of Parks and Recreation
Gary Willey, APCO, San Luis Obispo County Air Pollution Control District
Jeff Tupen, ECORP Consulting

Cc: California Air Resources Board (CARB)

Background

The amended Stipulated Order of Abatement (SOA), issued by the San Luis Obispo Air Pollution Control District (SLO APCD) on December 9, 2019, required the California Department of Parks and Recreation (Parks) to propose locations for 40 acres of seasonal dust control projects (amended SOA condition #3) and for a permanent dust control area of 4.2 acres (amended SOA condition #4). Parks submitted their initial proposal for these seasonal and permanent dust control projects on December 31, 2019. On January 15, 2020, The Scientific Advisory Group (SAG) provided comments on the Initial Proposal for 2020 Dust Control Projects. Based on SAG's comments, SLO APCD submitted a request for updates to the Initial Proposal for 2020 Dust Control Projects on January 21, 2020. In response to SAG and SLO APCD comments, Parks submitted a Revised Proposal for 2020 Dust Control Projects on January 31, 2020.

SAG Evaluation: 40-Acre Seasonal Dust Control

The SAG approves of the proposed 40-acre seasonal dust control project and the timeline for wind fencing installation. The SAG recognizes that April 1, 2020, is an aggressive deadline for completion. In case of delays due to permitting or workload limitations, the SAG simply requests that Parks provide updates to the SAG on revised timelines.

SAG Evaluation: 4.2-Acre Permanent Dust Control

The SAG approves of the proposed 4.2-acre permanent dust control project, including the updated location indicated on Figure 1 of the Revised Proposal for 2020 Dust Control Projects. Though the proposal indicates that completion of surface controls will occur by April 1, 2020, we recognize the possibility of delays. The SAG notes that the Amended SOA allows Parks until June 1, 2020, for completion of internal controls. The SAG simply requests that, in case of delay, Parks provide updates to the SAG on revised timelines.

SAG Evaluation: Modeling

In its previous letter, the SAG asked that Parks report on application of the Desert Research Institute (DRI) model to simulate dust emissions reductions resulting from the seasonal and permanent dust control. The SAG will work with Parks to ensure timely updates to the DRI model, to include the 2019 updated PI-SWERL emissions grid and finalization of the 2013 baseline scenario for assessing dust emissions reductions. The SAG will work with Parks to

incorporate these DRI model updates and simulations of dust control effectiveness into an abbreviated March 2020 Interim Report and Work Plan (IRWP), to be prepared by Parks.

The SAG appreciates the continuing hard work and cooperative spirit that Parks has displayed in its dust emissions reduction efforts in recent months. We look forward to successful completion of the seasonal and permanent dust control projects, alongside other continuing dust control efforts at Oceano Dunes.

Yours Sincerely,
The Scientific Advisory Group

Dr. William Nickling, Chair of SAG
Dr. Raleigh Martin; Dr. Ian Walker; Dr. Jack Gillies; Ms. Carla Scheidlinger; Mr. Earl Withycombe; Mr. Mike Bush