



Air Pollution Control District  
San Luis Obispo County

August 23, 2022

Sarah Miggins  
Deputy Director, OHMVR Division  
California Department of Parks and Recreation  
P.O. Box 942896  
Sacramento, CA 94296-0001

**SUBJECT:** Comments on the California Department of Parks and Recreation's August 1, 2022, Oceano Dunes SVRA Draft 2022 Annual Report and Work Plan in Response to Stipulated Order of Abatement Number 17-01

Dear Ms. Miggins:

We are in receipt of your Draft 2022 Annual Report and Work Plan (ARWP) for the Oceano Dunes SVRA, dated August 1, 2022. Thank you for submitting the Draft ARWP by the deadline specified in the Stipulated Order of Abatement (SOA).

The Draft ARWP documents the substantial effort by State Parks to understand and control windblown dust emissions from the Oceano Dunes State Vehicular Recreation Area (ODSVRA) over the last 5 years and it includes new areas for dust control in the plover enclosure. Despite the significant results so far and the projected future reductions that may occur when the mitigations mature, we cannot approve the ARWP in its current form because it does not obtain final compliance with the current SOA. We believe these issues can be resolved in the next 8 weeks when combined with clarifications or amendments to the SOA. Please see our detailed comments attached.

Based on the timelines required by the SOA, State Parks has 21 days or until September 14, 2022, to make the corrections and submit those changes for SAG and District review. After receipt of a provisionally approvable ARWP as required by the SOA, the APCD will schedule a public workshop. As we did last fall, the District plans to schedule the public workshop concurrently with a planned October 14, 2022, Hearing Board public meeting. This meeting will be held at 9:00 a.m. and will likely be held remotely using ZOOM.

As you are aware, the District plans to apply for changes to the Stipulated Order during the October 14<sup>th</sup> Hearing. An important provision would be to extend the final compliance date to allow time for the mitigations to mature and prove their effectiveness compared to the modeled reductions. Over the next 6 weeks it would be important to come to an agreement on any other changes needed to update the SOA prior to the Hearing.

Thank you and feel free to contact me with any questions.

Respectfully,



GARY E. WILLEY

Air Pollution Control Officer

Enclosures

cc: Liz McGuirk & Jon O'Brien, CA DPR, APCD Hearing Board, APCD District Board, APCD District Counsel, Coastal Commission Staff & SAG