



DEPARTMENT OF PARKS AND RECREATION

Off-Highway Motor Vehicle Recreation Division
PO Box 942896
Sacramento, California 94296-0001

Armando Quintero, *Director*

August 1, 2023

Mr. Gary Willey
Air Pollution Control Officer
San Luis Obispo County Air Pollution Control District
3433 Roberto Court
San Luis Obispo, CA 93401

RE: 2023 Annual Report and Workplan

Dear Mr. Willey:

We are pleased to submit the Draft 2023 Annual Report and Work Plan (ARWP) for your review and consideration. This submittal culminates many hours of staff time and work by the California Department of Parks and Recreation (State Parks) and the Scientific Advisory Group (SAG).

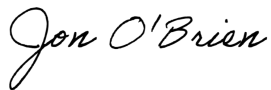
The 2023 ARWP is the fifth iterative document summarizing the status and overall progress of the Oceano Dunes State Vehicular Recreation Area (ODSVRA) Dust Control Program, but it is the first ARWP to be prepared since the Stipulated Order of Abatement (SOA) 17-02 was modified in October 2022. The SOA now requires the ARWP to be designed to “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.” This new excess emissions framework is different than the original SOA PM₁₀ mass emissions and concentration targets that had formed the basis for State Parks’ Dust Control Program and 2019 to 2022 ARWP documents. Accordingly, the 2023 ARWP Work Plan focuses on the actions and tasks State Parks and the SAG will undertake in the coming year to develop and refine this new reporting framework and evaluate the Dust Control Program under this new scheme. But even though the SOA does not require this new framework to be resolved until the end of 2024, State Parks is still obligated to report on the progress made towards reducing ODSVRA dust emissions and must choose how to best allocate its resources to do so. Thus, the 2023 ARWP is challenged with both looking backwards to provide continuity with previous work and reporting metrics and looking forwards to chart new work and reporting metrics.

As envisioned by the SOA and specifically required by the October 21, 2022, ARWP conditional approval letter, State Parks developed written 2023 ARWP modeling assumptions for review and approval by the SAG and the APCD. The modeling assumptions were originally developed and reviewed by the SAG in early June 2023 and submitted in writing to the San Luis Obispo County Air Pollution Control District (SLOAPCD) on July 11, 2023. Following initial concurrence on the modeling assumptions between State Parks and the SAG, new information came to light in the middle of July that has resulted in the need for Desert Research Institute (DRI) to revise the “pre-disturbance” modeling assumptions against which Dust Control Program progress was evaluated. The latest revision to the pre-disturbance model may provide an “apples to apples” comparison of Dust Control Program effectiveness but it is not directly relevant to the excess emissions framework adopted in the October 2022 SOA amendments. Due to the timing of this change in assumptions, the results of the revised pre-disturbance model were not yet available for inclusion in the Draft 2023 ARWP. State Parks is coordinating with DRI to have these newest model results available in time for the next 2023 ARWP submittal.

As outlined in the 2023 ARWP, State Parks continues to maintain more than 700 acres of dust control measures at ODSVRA.

State Parks recognizes submittal of the Draft 2023 ARWP today begins a period of dialog with the SLOAPCD and that we look forward to that discussion including receiving your comments on this ARWP. Thank you and we look forward to our ongoing collaboration on this effort.

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 Project Program Manager, OHMVR Division