



DEPARTMENT OF PARKS AND RECREATION

Off-Highway Motor Vehicle Recreation Division

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Armando Quintero, Director

1/16/2024

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 to 'eliminate emissions in excess of naturally occurring emissions...'

As per the 2023 Annual Report and Work Plan (ARWP) conditional approval letter from October 18th, 2023: State Parks shall work with the SAG to finalize the SAG-recommended emissivity grid to be used for determining compliance with the SOA emissions reduction goal. This recommendation shall be presented to the Air Pollution Control Officer (APCO) by February 1, 2024

The recommendation from the SAG includes 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

The pre-disturbance scenario will still be based on the non-riding area emissivity overlaid on the riding area (except using these zones). The current scenario will be based on the actual emissivity of the riding area in the zones.

As per the APCD conditional approval letter from the 2022 Annual Report and Work Plan, the actual 2022 pi-swirl data is to be used for the foredune area, and the plover enclosure. A weighted average will be used for the seasonally closed area.

State Parks concurs with the SAG modeling approach and will initiate work with the SAG and the Desert Research Institute to implement this framework. As per the October 18th Conditional Approval letter for the 2023 Annual Report and Work Plan, the APCD 'will approve a final set of model assumptions to be used in compliance determination' by February 14th, 2024.

State Parks will continue to work with DRI to address the second part of the conditional approval letter to explain why the 2013 and the 2019 modeling yielded divergent compliance results. That analysis will be submitted to the APCD prior to February 1, 2024.

Thank you.

Jon O'Brien

ODSVRA Air Quality Program Project Manager