



DEPARTMENT OF PARKS AND RECREATION

Off-Highway Motor Vehicle Recreation Division

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Sacramento, California 94296-0001

Armando Quintero, *Director*

August 1, 2022

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

RE: 2022 Annual Report and Workplan

Dear Mr. Willey:

We are pleased to submit the 2022 Annual Report and Work Plan (ARWP) for your review and consideration. This document culminates many hours of staff time and work by the California Department of Parks and Recreation (State Parks) Off-Highway Motor Vehicle Recreation Division (OHMVR Division) and the Scientific Advisory Group (SAG), comprised of dune geomorphologists, a staff member from the California Air Resources Board, and other scientists. This ARWP builds on many years of previous work including the 2019 Particulate Matter Reduction Plan and the 2019, 2020, 2021 ARWP's. This ARWP also reflects the many years of close coordination between the San Luis Obispo APCD and State Parks on dust issues from Oceano Dunes State Vehicular Recreation Area (ODSVRA). I want to personally thank you for your continued support and collaboration on these contentious issues at this popular Off-Highway Vehicle (OHV) park.

Over the past several years, State Parks and the OHMVR Division have worked closely with the SAG and the San Luis Obispo APCD to examine the initial mass reduction target set by the Stipulated Order of Abatement (SOA) in condition 2.c. This effort represents a strong collaborative approach to assess the initial mass reduction target with scientifically informed refinements and improved understanding and modeling of historical information to establish background emissions of PM10 from the ODSVRA.

In February 2020 the SAG provided their informed recommendation to modify the initial 50% mass reduction target. The work that went into this recommendation represents countless hours of research, field investigation, and analysis by multiple parties. The SAG concluded "...there is a strong scientific justification based on recent modeling for adjusting the PM10 emissions reduction target in the SOA from the initial 50% reduction to a value of 40.7%." The SAG notes "that its proposed new SOA target is designed to achieve a specific management objective: reducing PM10 emissions to levels associated with conditions prior to present-day levels of OHV disturbance, as represented by a 1939 emissions scenario."

State Parks built this Annual Report and Work Plan based on the analysis and recommendation of the SAG, and in particular the SAG recommended new SOA target of 40.7% mass reduction. The SAG reviewed a draft 2022 AWRP on July 15, 2022 and generally concurs with the approach to mass reduction in the ARWP. Consistent with that research, State Parks intends to apply to amend the SOA to modify the mass reduction target from the initial 50% to the SAG supported 40.7%. This amendment application will also address the background fine particulate concentrations at the CDF and Mesa 2 monitoring stations.

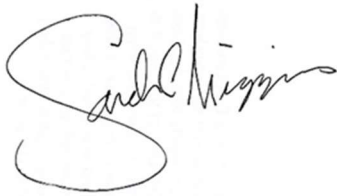
It is important to emphasize that this ARWP outlines and analyzes over **700** acres of dust control projects that are currently in place within ODSVRA, including the permanent closure of the approximately 300-acre western plover and California least tern nesting area. As initially mentioned during the June 2020 Hearing Board meeting, we consulted with the SAG to determine a scientifically sound method to assess dust reductions from this closure and have incorporated those reductions, and other model refinements, into our annual report. With the inclusion of this new area, we have met the SAG supported 40.7% reduction target. The work plan also includes ongoing vegetation restoration projects in areas already under some form of dust control (wind fence and straw treatment) from previous years. More importantly, the work plan includes commitments to continue to monitor field conditions and verify that the data that is informing the Desert Research Institute (DRI) model is accurate; continue monitoring of atmospheric and dust levels in the park; and perform additional field emissions testing. State Parks is committed to monitor, verify, and adapt measures taken to date in order to continue to achieve the dust emission goals beyond the dates in the SOA.

State Parks recognizes that the current SOA includes an initial 50% mass emissions reduction target. We recognize that the SOA will need to be amended to meet the SAG supported mass emissions reduction target of 40.7%. Notably, the AWRP demonstrates State Parks' commitment to continue dust control efforts within ODSVRA including working with the SAG on monitoring plans and an adaptive management framework that ensures that there is continued progress to meet the dust reduction targets from this SOA. We are also demonstrating our commitment to continue treatments and enhancements to the areas that have been closed for dust control purposes. This includes efforts to revegetate all areas that have not been treated to date, and enhancements to areas that have been treated but require additional work including the foredune project area and the areas that need supplemental vegetation.

In short, State Parks recognizes that achieving and maintaining dust emissions goals into the future will require continued work and collaboration amongst all parties. We are committed to implementing projects and extensive field monitoring needed to meet these goals. To that end, we are initiating work on extending or amending the current SAG contracts and will work with the SAG on bringing in the appropriate experts as the needs of this project evolve.

State Parks also recognizes submittal of the 2022 ARWP today begins a period of dialog with the SLO Air Pollution Control District and that we look forward to that discussion including receiving your comments on this ARWP. Thank you again and we look forward to our ongoing collaboration on this effort.

Sincerely

A handwritten signature in black ink, appearing to read "Sarah Miggins". The signature is written in a cursive style with a large, looping initial "S" and a horizontal line through the middle of the name.

Sarah Miggins, Deputy Director, OHMVR Division