

Initial Proposal for 2020 Dust Control Projects

December 31, 2019

Background

The California Department of Parks and Recreation (CDPR, Department, State Parks) agreed to implement the amended Stipulated Order of Abatement (SOA) at a hearing of the San Luis Obispo Air Pollution Control District Hearing Board on November 18, 2019. This document focuses on two requirements of that amended SOA requiring the Department to propose locations for a permanent dust control area of 4.2 acres (per condition #4) and 40 acres of seasonal dust control projects (per condition #3).

At a meeting with the Scientific Advisory Group (SAG) on December 12 and 13, 2019, State Parks discussed these projects and agreed to propose initial projects that could be updated or amended based on new versions of the Desert Research Institute computer model. The computer model will be updated in January and February 2020 with new meteorological and emissions data from an intensive effort during 2019. The SAG agreed that State Parks should propose initial sites per the deadlines in the amended SOA but that those sites should be evaluated using the updated computer model and could be revised based on that evaluation.

Condition #3.ii of the amended SOA states:

By January 1, 2020, Respondent [CDPR] shall submit a proposal that shall include the specific season dust control measures that will be utilized, and proposed locations of the specific measures, to the APCO and Advisory Group. This proposal shall include an implementation plan schedule, including, but not limited to, an increment of progress schedule and a final completion date

All work on this 40 acre seasonal dust control is to be started by March 15, completed by April 1, and must remain in place until October 31, 2020

Condition #4 outlines two possible alternatives for the permanent dust control at 4.2 acres. If the Department chooses to implement this project at the area mapped in Attachment 1 of the original SOA adjacent to Pavilion Hill, that project is to be fenced by March 15, 2020 and all internal controls are to be complete by June 1, 2020. Alternately, if the Department chooses to propose alternate treatment areas, those areas would be evaluated under the timeline established in Condition #3 (started by March 15 and completed by April 1, 2020)

The Department examined the location of the 4.2 acre area mapped in Attachment 1 of the original SOA and determined that that closure would be infeasible because, with the addition of a 48 acre foredune as specified in condition 1 of the amended SOA, this new area would block traffic in a key travel corridor known as the Sand Highway. Therefore, the Department is proposing an alternate location for this permanent 4.2 acres of dust control projects.

Proposed Projects

Attachment 1 shows three areas where the Department is proposing to install permanent and seasonal dust control projects. The areas are summarized below.

Area #1 – Approximately 20 acres in the area known as Open Area at the northeast portion of the La Grande Tract. This site will receive seasonal treatment which will consist of progressive rows of wind fencing placed 28 feet apart as has been previously shown to reduce saltation within the treatment areas by up to 80%.

Area #2 – Approximately 20 acres on the southeast portion of the La Grande tract where the Department has previously installed seasonal dust controls from 2015-2018. This area would have seasonal dust controls such as wind fencing as described for Area #1.

Areas 1 and 2 combine to be approximately 40 acres and would constitute the proposal for 40 acres of seasonal dust control projects. These areas were chosen because they contribute to downwind dust levels as measured directly at the CDF station or in the Nipomo Mesa area as determined by computer modeling.

Area #3 – Approximately 4.2 acres located in the southeastern portion of the La Grande tract and adjacent to a permanent dust control area called LaGrille Hill that was restored with native vegetation in 2018/2019. This area would be permanently closed and would have some form of surface treatment such as straw bales or wind fencing. This area would be restored to native vegetation and would be prioritized against other areas for native dune plants in consultation with the SAG.

Area #3 would satisfy the requirement for an alternate location for a 4.2 acre permanently closed area in lieu of the area referenced in Attachment 1 in the original SOA adjacent to Pavilion Hill.

In total, areas 1, 2, and 3 constitute a proposal for 44.2 acres of dust control. All dust control areas were chosen to effect areas that have been linked through computer modeling to high PM10 dust levels as measured at the CDF station or more broadly on the Nipomo Mesa. All projects will be subject to the availability of materials, equipment, supplies, and labor necessary to complete the treatments.

Implementation Plan Schedule

Consult with SAG on Surface Treatment – The Department will consult with key members of the SAG to determine the most appropriate surface treatment for all of these areas. This consultation will be complete by *January 31, 2020*

Procure Materials and Schedule Work – The Department will purchase all necessary materials to install the dust control surface treatments and will arrange for appropriate equipment and labor to complete this work. All items will be purchased by *March 15, 2020*

Complete Environmental Review and Permitting – The Department will evaluate the treatment areas for consistency with the existing dust control EIR or the Supplemental EIR that is being prepared. If needed, the Supplemental EIR will be updated to include these projects and three treatment areas. Concurrently, the Department will evaluate if these projects can be covered by existing Coastal Development Permits or approvals for consistency with the California Coastal Act. If needed, these projects will be added to new or pending permits with the Coastal Commission to allow them to be installed in the outlines in the amended SOA.

Install perimeter fence – All three treatment areas would receive a perimeter fence to exclude public vehicle entry. The perimeter fence consists of metal strand fencing stretched across T-posts and Peeler Poles installed at regular intervals.

Install surface treatment – Surface treatment installation will commence upon completion of the perimeter fencing and should take a maximum of 8 weeks. All work installing surface treatments should be complete by *May 15, 2020*.

Monitor – In consultation with the SAG, the Department will install instruments upwind, within, and downwind of the treatment areas to determine effectiveness of treatments. Monitoring at these treatment areas will be balanced with other monitoring needs throughout the SVRA. Contracts and staff are in place to install and operate instruments based on items currently within stock.

Completion date – All three treatment areas should be closed to the public by *March 15, 2020* and all surface treatments should be complete by *May 15, 2020*, subject to delays caused by weather, mechanical failure, labor shortages, or other regulatory requirements related to endangered species protections.

Implementation Plan Schedule													
Activity	Duration	2019		2020									
		Dec	Jan	Feb	March	Apr	May	June	July	Aug	Sept	Oct	
Consult With SAG	Dec 19 - Jan 20												
Procure Materials	Dec 19 - March 20												
Schedule Work	Dec 19 - March 20												
Environmental Review and Permitting	Dec 19 - March 20												
Install Perimeter Fence	March-20												
Install Surface Treatment	March 20 - May 20												
Monitor Performance	May 20 - October 20												

Ongoing
 Completion

Review and Revision

Once the Desert Research Institute computer model is updated, the Department will work with the SAG to run these three proposed treatment areas through the model and determine if the projects help to meet the objectives of the original and amended SOA's. Other areas will be evaluated to determine if they can better meet the objectives of the SOA's and, if that is the case, the Department will work with the SAG to identify alternate treatment locations. All treatment areas (current or proposed new) will be evaluated based on a number of dust control and operational criteria to make sure they can achieve project objectives while providing for public access and safety within the SVRA.



Source: CDPR, Desert Research Institute

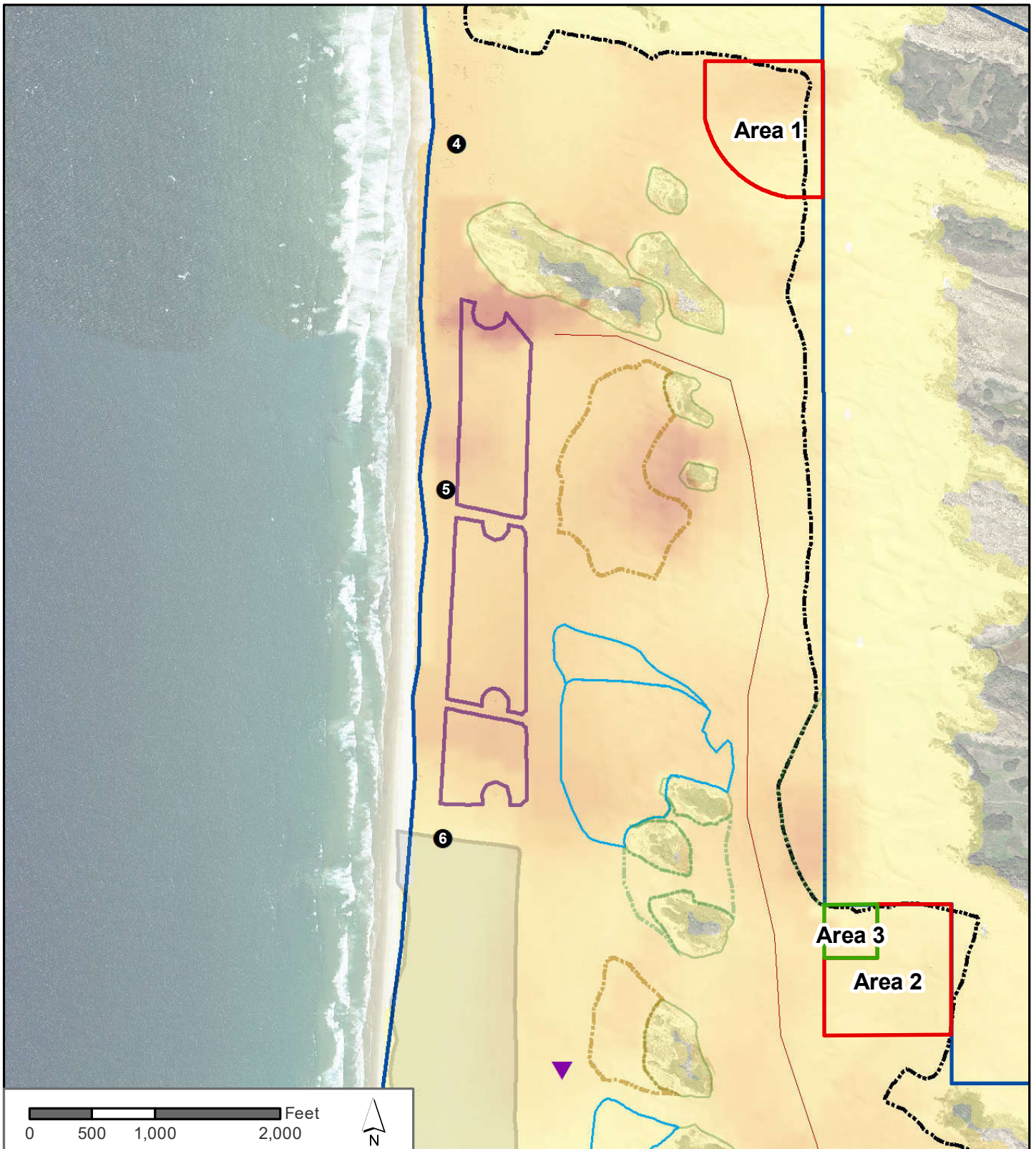
12/27/2019

- 4.2 acre permanent restoration
- Seasonal wind fencing/dust control (40 acres)
- 2019 Foredune restoration (48 acres)
- Initial SOA wind fencing projects
- Initial SOA straw bales/restoration
- Pre-SOA vegetation project (2014 and 2017)

- Existing fenced vegetation islands (186 acres)
- Sand Highway, approx.
- Marker post
- Open riding and camping area boundary fence
- Nesting enclosure
- Park boundary



2020 Dust Control Proposed
Oceano Dunes SVRA 2019



Source: CDPR, Desert Research Institute

12/27/2019

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