



Air Pollution Control District
San Luis Obispo County

November 25, 2020

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

SUBJECT: Conditional Approval of 90 Acres of Dust Controls to be Implemented by California Department of Parks and Recreation as Part of Their 2020 Annual Report and Work Plan in Response to Stipulated Order of Abatement Number 17-01

Dear Ms. Miggins,

Thank you for your submission of Department of Parks and Recreation Off Highway Motor Vehicle Recreations Division's (OHMVR) plan for 90 acres of dust controls to be completed as part of the 2020 Annual Report and Workplan (ARWP).

As you know, on October 28 the District granted final approval to OHMVR's 2020 ARWP. That approval was conditioned on OHMVR determining, by November 16, the locations of 90 acres of new temporary/seasonal dust controls and their expected impacts on dust emissions and downwind PM₁₀ concentrations. The District later extended this deadline to November 23, to allow for consultation between OHMVR and the Scientific Advisory Group (SAG), as described in the attached email.

OHMVR submitted its plan and the SAG's review letter on November 20 (both attached), and the plan was discussed on a November 23 conference call between the District, the SAG, and OHMVR. As discussed on the call, these mitigations are estimated to decrease PM₁₀ concentrations at the District's Mesa2 monitoring station by 26% relative to the 2013 baseline, and are expected to reduce PM₁₀ mass emissions by another 7% toward the 50% goal outlined in Stipulated Order of Abatement Number 17-01 (SOA). While 26.6 acres of the proposed controls are located outside of the riding area, the emission modeling showed the area as highly emissive and control would result in significant reductions on the southern Mesa. Based on that conversation and the SAG's recommendation, the District now approves the locations of these 92.2 acres of new temporary/seasonal dust controls to be implemented in the 2020/2021 cycle.

As conditions of this approval:

- OHMVR shall work expeditiously to obtain any permits or authorizations from other agencies which may be needed to authorize to the activities proposed. If a permit or authorization is denied, OHMVR shall propose an alternative plan which achieves the same or greater estimated reduction if PM₁₀ mass emissions. All deadlines noted below for the implementation of current plan shall also apply to the alternative plan.
- As proposed in the ARWP, the 90 acres of new dust controls shall be completely fenced off, with public vehicular access and camping prohibited, by March 31, 2021. Dust control treatments shall be completed by April 15, 2021, and temporary/seasonal controls shall remain fully in place until the 2021 AWRP has been approved.

Feel free to contact me with any questions,

Respectfully,



Gary E. Willey

Air Pollution Control Officer

Enclosures

cc: Jon O'Brien, CA DPR, APCD Hearing Board, APCD District Board, APCD District Counsel, APCD Hearing Board Counsel, Coastal Commission Staff & the Scientific Advisory Group

Gary Willey

From: Gary Willey
Sent: Monday, November 16, 2020 4:02 PM
To: O'Brien, Jon@Parks; Karl Tupper; Miggins, Sarah@Parks; William Nickling
Cc: Raleigh Martin; Ian Walker; Withycombe, Earl@ARB; Jack Gillies; Carla Scheidlinger; Mike Bush
Subject: RE: [EXT]RE: Reminder: Deadline approaching for determining 2020 dust control locations

Hi Jon.

With this email, I have extended the deadline till Monday November 23, 2020.

Please schedule a full meeting with the SAG, OHV and APCD representatives this week.

Thanks

Gary

From: O'Brien, Jon@Parks <Jon.OBrien@parks.ca.gov>
Sent: Monday, November 16, 2020 3:48 PM
To: Karl Tupper <ktupper@co.slo.ca.us>; Miggins, Sarah@Parks <Sarah.Miggins@parks.ca.gov>; William Nickling <wnickling@gmail.com>
Cc: Raleigh Martin <raleighmartin@gmail.com>; Ian Walker <ianjwalker@asu.edu>; Withycombe, Earl@ARB <earl.withycombe@arb.ca.gov>; Jack Gillies <jack.gillies@dri.edu>; Carla Scheidlinger <cscheidlinger@gmail.com>; Mike Bush <Mbushii@gmail.com>; Gary Willey <gwilley@co.slo.ca.us>
Subject: [EXT]RE: Reminder: Deadline approaching for determining 2020 dust control locations

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Karl,

Parks would like to request an extension on the final date for the 90 acre plan, to allow for SAG review.

To allow a few days for review, I think we can get you the plan by this Friday, 11/20, or Monday, 11/23.

Please let us know if one of these dates will work for the APCD.

Thank you.

Jon

From: Karl Tupper <ktupper@co.slo.ca.us>
Sent: Monday, November 16, 2020 1:34 PM
To: O'Brien, Jon@Parks <Jon.OBrien@parks.ca.gov>; Miggins, Sarah@Parks <Sarah.Miggins@parks.ca.gov>; William Nickling <wnickling@gmail.com>
Cc: Robertson, Brian@Parks <Brian.Robertson2@parks.ca.gov>; Raleigh Martin <raleighmartin@gmail.com>; Ian Walker

<ianjwalker@asu.edu>; Withycombe, Earl@ARB <earl.withycombe@arb.ca.gov>; Jack Gillies <jack.gillies@dri.edu>;
Carla Scheidlinger <cscheidlinger@gmail.com>; Mike Bush <Mbushii@gmail.com>; Gary Willey <gwilley@co.slo.ca.us>
Subject: Re: Reminder: Deadline approaching for determining 2020 dust control locations

Dear OHVMR team and SAG,

As everyone should know, according to the District's letter dated October 28, today is the day by which "(OHMVR) shall, **in consultation with the Scientific Advisory Group**, determine the type(s) and location(s) of 90 acres of new temporary/seasonal dust control as well as their expected impacts on dust emissions and downwind PM10 concentrations." Based on informal conversations, SAG consultation has not yet occurred regarding these 90 acres. Please let the District know if consultation has in fact occurred, or if more time is needed to consult. As noted in the letter from October 28th, today's deadline may be extended by the APCO.

Karl

From: Karl Tupper <ktupper@co.slo.ca.us>
Sent: Monday, November 9, 2020 10:42 AM
To: O'Brien, Jon@Parks <Jon.O'Brien@parks.ca.gov>; Miggins, Sarah@Parks <Sarah.Miggins@parks.ca.gov>; William Nickling <wnickling@gmail.com>
Cc: Robertson, Brian@Parks <Brian.Robertson2@parks.ca.gov>; Raleigh Martin <raleighmartin@gmail.com>; Ian Walker <ianjwalker@asu.edu>; Withycombe, Earl@ARB <earl.withycombe@arb.ca.gov>; Jack Gillies <jack.gillies@dri.edu>; Carla Scheidlinger <cscheidlinger@gmail.com>; Mike Bush <Mbushii@gmail.com>; Gary Willey <gwilley@co.slo.ca.us>
Subject: Reminder: Deadline approaching for determining 2020 dust control locations

Dear OHVMR team and SAG:

This email is a friendly reminder that per the [District's Conditional Approval Letter, dated October 28](#), State Parks OHMVR Division and the SAG are to determine the locations of the 2020 ODSVRA dust control projects by November 16, which is now one week away. District approval of the plan must then be obtained by November 18.

Please let Gary or I know if you have any questions.

Thanks,
Karl

Karl Tupper
Senior Air Quality Scientist
San Luis Obispo County
Air Pollution Control District
ph: 805.781.4656
email: ktupper@co.slo.ca.us
web: www.slocleanair.org
air quality map: <https://ktupper.shinyapps.io/SLOAPCDWebDataDisplay/>

[EXT]2020 ARWP-90 acre option

O'Brien, Jon@Parks <Jon.O'Brien@parks.ca.gov>

Fri 11/20/2020 5:33 PM

To: Gary Willey <gwilley@co.slo.ca.us>

Cc: Bill Nickling <wnickling@gmail.com>; Miggins, Sarah@Parks <Sarah.Miggins@parks.ca.gov>; Kevin Pearce <Kevin.Pearce@parks.ca.gov>; Glick, Ronnie@Parks <Ronnie.Glick@parks.ca.gov>; McGuirk, Liz@Parks <Liz.McGuirk@parks.ca.gov>; Ketterer, Brian@Parks <Brian.Ketterer@parks.ca.gov>; Carla Scheidlinger <cscheidlinger@gmail.com>; Mike Bush <Mbushii@gmail.com>; Withycombe, Earl@ARB <earl.withycombe@arb.ca.gov>; Raleigh Martin <raleighmartin@gmail.com>; Ian Walker <ianjwalker@asu.edu>; Jack Gillies <jack.gillies@dri.edu>; Karl Tupper <ktupper@co.slo.ca.us>

📎 2 attachments (835 KB)

90MoreAcres_Option1_20201022.pdf; SAG Review of 90 Acre Treatments - 20201120.pdf;

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Gary,

Find attached the Parks proposal for 90 acres of dust mitigation as per the 2020 ARWP.

The modeling data for this proposal is below. There model predicts a 7% mass emission reduction with this proposal, from 15% to 22%.

	Permanent Area Treated	Riding areas only	Cumulative Abatement [%]	% Towards SOA Goals
Baseline	0	182.797646	100	
2011-2020	224.049461	155.3141609	84.96507709	15.03
2021 Proposal	91.75566446	142.6390701	78.03113069	21.97

The SAG review of this proposal is also attached.

We look forward to discussing this more on Monday, 11/23, at 11am.

Jon

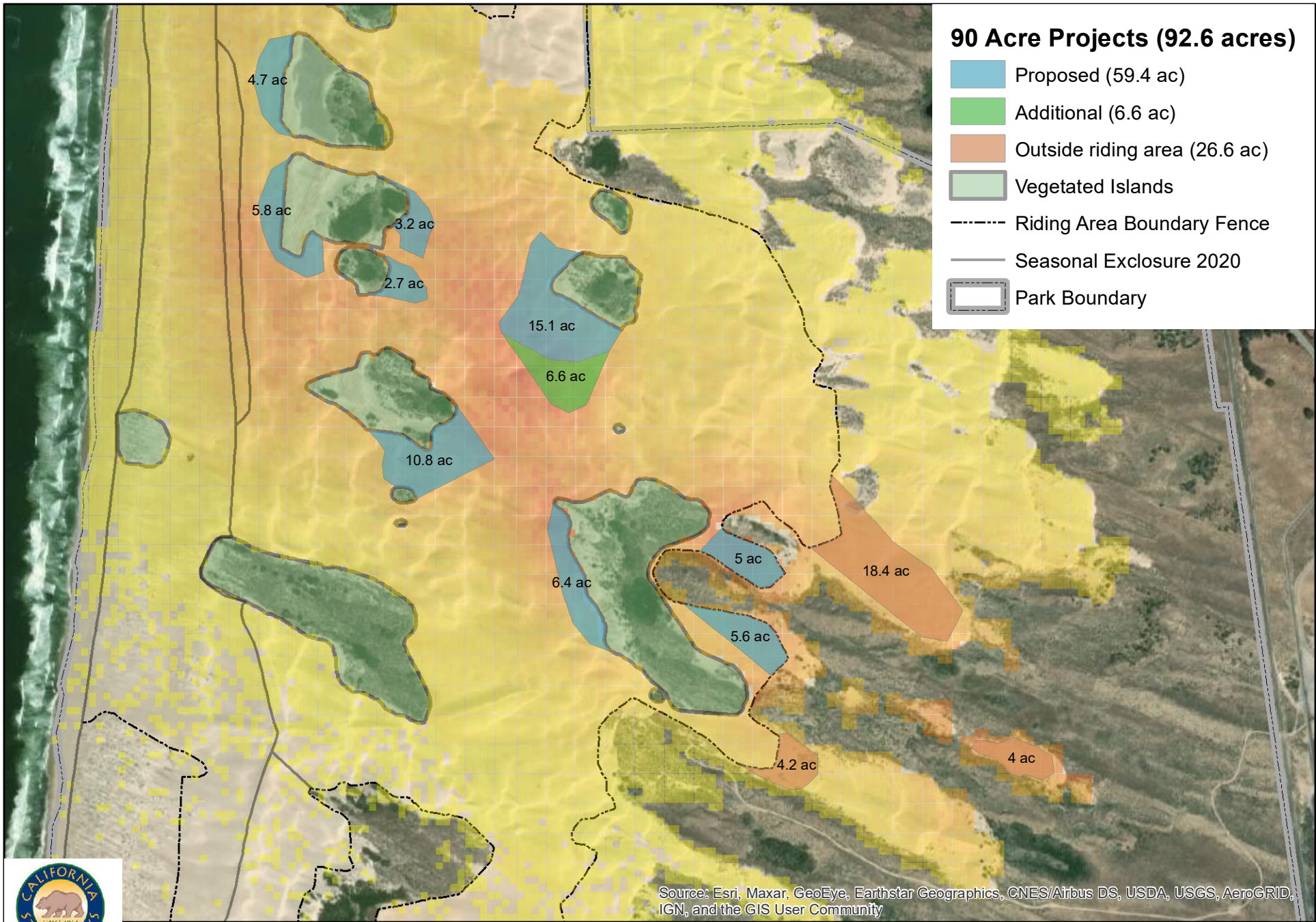
Jon M. O'Brien
Environmental Program Manager
Off Highway Motor Vehicle Recreation Division
CA State Parks and Recreation
1725 23rd Street, Suite 200
Sacramento, CA 95816

Cell phone: 916-204-0871

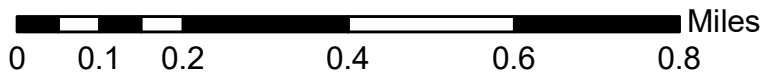
Email: Jon.O'Brien@parks.ca.gov

<http://ohv.parks.ca.gov/>





10/22/2020



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Option 1

November 20, 2020

Memo: Scientific Advisory Group (SAG) Review of 90 Acre Treatment Options for 2020-21 ARWP

From: The Scientific Advisory Group (SAG)

To: Jon O'Brien, California Department of Parks and Recreation

In its conditional approval of the 2020-21 Annual Report and Work Plan (ARWP), the San Luis Obispo Air Pollution Control District (SLOAPCD) directed Parks, in consultation with the SAG, to identify approximately 90 acres within the ODSVRA for new temporary/seasonal dust controls and their expected impacts on dust emissions and downwind PM₁₀ consultations. Parks presented four treatment options to the SAG, along with dust emissions modeling analysis prepared by the Desert Research Institute (DRI).

Among the options presented, the SAG recommends Option 2 as the most effective for dust emissions reduction, but the SAG also supports Option 1 as potentially achieving a similar level of dust emissions reduction.

The SAG finds that **Option 2** is likely to provide the greatest reduction in dust emissions and downwind PM₁₀ concentrations among the options presented. The effectiveness of Option 2 is supported by the DRI model, which predicts a greater net emissions reduction for Option 2 than for any of the other options presented. In addition, the vast majority of acreage for Option 2 is contained within the Riding Area, which is known to be (on average) more emissive than Non-Riding Areas. All of the other options presented place a substantial fraction of dust mitigation treatments in Non-Riding Areas. Thus, the Option 2 treatments are likely to provide a greater per-acre reduction in PM₁₀ dust emissions as compared to these other options.

The SAG also supports **Option 1**. Though the DRI model predicts smaller emissions reductions for Option 1 than for Option 2, the SAG notes that the modeled difference between these two options is within the margin of uncertainty between modeled and observed values for the DRI model (see 2020-21 ARWP, Sec. 2.3.3.1). Thus, the SAG cannot unambiguously state that Option 2 will necessarily reduce dust emissions by more than Option 1.