



Air Pollution Control District  
San Luis Obispo County

October 21, 2022

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

**SUBJECT:** Conditional Approval of California Department of Parks and Recreation's  
2022 Annual Report and Work Plan in Response to Stipulated Order of  
Abatement Number 17-01

Dear Sarah Miggins,

In accordance with Stipulated Order of Abatement Number 17-01 (SOA), a public workshop was held remotely via ZOOM Teleconference on October 14, 2022, to receive public comment on the provisionally approved 2022 Annual Report and Work Plan (ARWP) that you submitted on September 14, 2022. After considering public input, the District now grants final approval of the plan, subject to the following conditions:

**Permanent Closure of the Plover Enclosure**

- a. If the Plover Enclosure area, in whole or in part, is reopened to public vehicular access, State Parks shall simultaneously implement District-approved dust controls sufficient to offset the resulting increase in emissions.

**Emissions Reductions Crediting**

- b. Emission calculations in the 2023 ARWP shall be based on assumptions recommended by the SAG and preapproved, in writing, by the APCO.
- c. If APCO approval of emissions modeling assumption is not obtained prior to the submission of the 2023 ARWP, then the emissions modeling shall use the following assumptions:
  - i. The same PI-SWERL dataset(s) used to derive the emissivity grid for the pre-disturbance scenario shall be used to derive the emissivity grid for the mitigation scenario, with the exceptions noted below for seasonal closures and the Plover Enclosure. If recommended by the SAG, State Parks may recalculate pre-disturbance emissions using different assumptions and/or data than those used by the SAG in their initial recommendation (e.g., 2022 PI-SWERL measurements may be incorporated); however, the same updates must also be applied to the calculation of emissions under the mitigation scenario.

- ii. Emissions from areas that are seasonally open to off-roading shall be modeled based on the weighted average of the average emissivity of riding and non-riding areas.
- iii. When modeling emissions from the permanent closure of the Plover Exclosure area, the emissivity grid shall be derived from actual PI-SWERL measurements conducted since it was permanently closed.

**Coordination with Coastal Commission**

- d. Certain dust control elements of the ARWP may require authorization by the California Coastal Commission. For any element which the Commission declines to authorize, State Parks shall substitute dust controls sufficient to yield an equivalent reduction in emissions. Any such alternative treatment shall be selected in consultation with the SAG and the District and be installed according to the same timeline proposed for the original treatment (i.e., the area must be fenced by March 31 and treatment completed by April 15).
- e. If a Coastal Development Permit amendment application is submitted to the California Coastal Commission, it shall note that the District has found that any dust control measures to be authorized under the permit amendment will aid in the compliance with District Rule 1001 as well as with the SOA. This requirement may be waived with the approval of the APCO.

Feel free to contact me with any questions,

Respectfully,



Gary E. Willey  
Air Pollution Control Officer

cc: Jon O'Brien  
CA DPR  
Hearing Board  
District Board  
District Counsel  
Hearing Board Counsel  
Coastal Commission Staff  
The Scientific Advisory Group

GEW/KAT/lmg