



Air Pollution Control District
San Luis Obispo County

February 8, 2024

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

SUBJECT: Approval of California Department of Parks and Recreation's Modeling Assumptions to be used in their 2024 Annual Report and Work Plan in Response to Stipulated Order of Abatement Number 17-01

Dear Sarah Miggins,

On October 18, 2023, the San Luis Obispo County Air Pollution Control District granted final conditional approval of California Department of Parks and Recreation's 2023 Annual Report and Work Plan (ARWP). Among other things, the approval was conditioned on the following:

3. *To ensure that the remaining modeling issues are resolved expeditiously:*
 - a. *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 APCO by February 1, 2024, and shall include a statement of concurrence from the SAG and an analysis of why "Scenario 1" and "Scenario 2" from the ARWP yield divergent results.*
 - b. *By February 14, 2024, the District will approve a final set of emissions assumptions to be used in compliance determination.*
 - c. *By March 15, 2024, State Parks shall present to the SAG and District emissions estimates, for both the ODSVRA as currently configured and the 1939 pre-disturbance scenario. These estimates shall incorporate the modeling assumptions approved by the APCO.*

On December 19, 2023, the Scientific Advisory Group (SAG) furnished to the District and State Parks a memo^{1,2} with their final recommendations regarding emissivity grids for use in modeling compliance with the terms of Stipulated Order of Abatement (SOA) 17-01. The SAG also provided companion documents responding to comments from the District and State

¹ SAG, "Memo: Updated SAG Recommendations for Establishing Emissivity Grids to be used in Modeling of Pre-Disturbance Conditions and Future Excess Emissions Reductions," December 19, 2023.

² Unless otherwise noted, all documents referenced in this letter are all available in the Winter 2023 Update section of the District's "Oceano Dunes Efforts" webpage at <https://www.slocleanair.org/air-quality/oceano-dunes-efforts.php>.

Parks on an earlier version of the memo,³ and analyzing emissivity measurements from the "Plover Exclosure" area.⁴

On January 16, 2024, State Parks provided a letter concurring with the SAG's recommendations and committing to implement them.⁵ On January 31, 2024, State Parks provided a report authored by Desert Research Instituted which analyzes why "Scenario 1" and "Scenario 2" modeling results from the 2023 ARWP yield divergent results.⁶ With the submission of these documents, the deadlines called out in Conditions 3.a, above, have been met.

The District has reviewed these documents, and appreciates the substantial effort for by the SAG and State Parks. The proposed methodology is rational and improves upon the previous approach; however, as noted in our comments on an earlier version of the recommendations,⁷ we have concerns about some assumptions for the Plover Exclosure, specifically, that the area has lower emissivity today than it did prior to disturbance by off-roading. Nonetheless, we defer to the SAG's expertise and hereby approve the proposed emissions assumptions for use in the current modeling.

Per Condition 3.a of the conditional approval of the 2023 ARWP, State Parks shall submit revised modeling based on these approved assumptions by March 15. Consistent with the SAG's recommendation, additional PI-SWERL measurements are planned for 2024 and beyond, with the results to be incorporated into the existing emissivity data set and used in future modelling. However, should 2024 PI-SWERL testing show significant conflicting emissivity data for the Plover Exclosure, further modeling may need to occur prior to the next Hearing Board meeting in October 2024.

Feel free to contact me with any questions,

Respectfully,



Gary E. Willey
Air Pollution Control Officer

Attachment

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

³ SAG, "Memo: Reply to Comments from APCD and CDPR on SAG Proposed Emissivity Grids Document of June 21, 2023," December 19, 2023.

⁴ SAG, "Memo: Analysis of PI-SWERL Measurements in Plover Exclosure Area," January 12, 2024.

⁵ Letter from Jon O'Brien to Gary Willey, dated January 16, 2024.

⁶ Desert Research Institute, "'Scenario 1' and 'Scenario 2' divergent results," undated.

⁷ SLO APCD, "APCD Comments on the SAG Proposal Re: Emissivity Grids," August 1, 2023. Available online at

<https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Revised%20Comments%20on%20SAG%20proposal%20on%20emissivity%20grids.pdf>