



Air Pollution Control District
San Luis Obispo County

VIA EMAIL & CERTIFIED MAIL

September 29, 2023

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

SUBJECT: Provisional Approval of California Department of Parks and Recreation's
September 11, 2023, Second Draft of 2023 Annual Report and Work Plan in
Response to Stipulated Order of Abatement Number 17-01

Dear Sarah Miggins:

Thank you for submitting a revised Second Draft 2023 Annual Report and Work Plan (second draft ARWP) on time on September 11, 2023, as required by Stipulated Order of Abatement Number 17-01 (SOA). The Scientific Advisory Group (SAG) submitted its review of this draft on September 21, 2023. We are provisionally approving this plan as it adequately addressed the comments from the SAG and the District.

The SAG comment letter on the second draft ARWP made several editorial comments and noted unresolved issues from the District's comments on the first draft. This provisional approval is conditional upon State Parks revising the ARWP to address these issues, specifically items 8, 9, and 12-20 of the SAG comment letter. The third draft ARWP may not incorporate any other changes unless approved by the Air Pollution Control Officer and must be submitted to the District by Thursday, October 5, 2023.

Certain modeling issues remain unresolved. While it is apparent from modeling and observation that dust emissions have been significantly reduced, the unresolved issues prevent a determination of whether State Parks has achieved the emissions reduction target of the SOA. Specifically, the second draft ARWP discloses the results of emissions modeling under two sets of assumptions. Under "Scenario 1," which employs emissivity assumptions derived from the 2013 PI-SWERL campaign, emissions have been reduced to a level approximately 18 metric tons per day less than the 1939 pre-disturbance scenario. Under "Scenario 2," which employs data from the 2019 PI-SWERL campaign, approximately 18 additional metric tons per day of emissions reductions are still needed to achieve compliance. Furthermore, the SAG has recommended a set of emissivity assumptions, but these have yet to be put into practice. State Parks, in consultation with the SAG and the District, must work expeditiously to resolve these modeling issues and produce a final model that can be used to determine compliance.

A related issue is the “excess emissions framework” proposed in Section 3.3 of the ARWP. On September 14, 2023, after the second draft had been submitted, a discussion occurred between representatives of State Parks, the SAG, and the District. As documented in the attached memo, there was consensus to:

1. *Focus efforts on quantifying mass emissions from the ODSVRA using PI-SWERL measurements and emissions modeling for both the pre-disturbance scenario and the ‘current’ landscape (configured for some future date of attainment rather than as of September 2023 should more mitigation projects become necessary).*
2. *Compile evidence that demonstrates convincingly that the range of dust mitigation strategies implemented by CDPR have made (and continue to make) a difference in reducing PM10 concentrations at downwind locations leading to overall air quality improvements. These might include trends in (i) TPM10:TWPD ratio, (ii) differences-indifferences analysis; (iii) number of exceedance days; and (iv) other metrics yet to be determined.*
3. *Continue with adaptive management with a view to controlling dust emissions from the ODSVRA and improving air quality downwind, which may include:*
 - a. *Continued field monitoring of relevant parameters;*
 - b. *Updating the PI-SWERL grid with a focus on strategic areas and times;*
 - c. *Using advanced analytical approaches to understand dust emission and dispersion, including, but not limited to, model refinements;*
 - d. *Renewed commitment to implement dust mitigation projects when recommended by the scientific evidence.*

As there is consensus for this approach, the District will not require State Parks to complete work on the now optional “excess emissions framework,” even though it is an element of the approved ARWP. (State Parks remains free to continue pursuing the “excess emissions framework”, if they choose.)

We have scheduled the public workshop for the final draft ARWP to occur during the APCD Hearing Board's Annual SOA information update meeting on October 13, 2023. The meeting will be held in person at the San Luis Obispo County Board of Supervisors Chambers located at 1055 Monterey Street, San Luis Obispo. The format for the workshop portion of the meeting will include a presentation of the final draft ARWP by State Parks, and presentation on the adequacy of the ARWP and effectiveness of the mitigation by the SAG and APCD.

After considering all public comment received at the workshop, the District will make a final decision on the final draft ARWP. Approval would likely be conditional; the conditions of the final approval will likely include:

- If the Plover Exclosure 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. If feasible, a final set of PI-SWERL measurements should be made in the area before it is reopened.

- Consistent with the attached memo quoted above, State Parks is not required to complete the work on the excess emissions framework proposed Section 3.3 of the ARWP.
- To ensure that the remaining modeling issues are resolved expeditiously:
 - 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.
 - By February 14, 2024, the District will approve a final set of emissions assumptions to be used in compliance determination.
 - 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.

Feel free to contact me with any questions.

Sincerely,



GARY E. WILLEY

Air Pollution Control Officer