

APCD_slcleanair

From: Kara Woodruff <KWoodruff@blakeslee-blakeslee.com>
Sent: Thursday, May 2, 2019 10:34 AM
To: 'info@slcleanair.org'
Subject: [EXT]Comments on DPMRP for the Oceano Dunes

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

Good morning – I attended the APCD meeting last night in Arroyo Grande and appreciate the efforts by your agency in updating the public on the DPMRP to reduce dust emissions from Oceano Dunes and thereby improve air quality for neighboring communities.

If State Parks (with the cooperation of APCD) wish to continue to operate Oceano Dunes for off-highway vehicle activity, please do so in a manner that is consistent with state and federal law. Specifically, please proceed as follows:

- (1) Ensure that any take of special status species (including snowy plovers and least terns) is pursuant to a valid Habitat Conservation Plan under the federal Endangered Species Act, which is long, long over due;
- (2) Ensure that the Oceano Dunes activities are consistent with the Local Coastal Program (as certified by the Coastal Commission in 1983), including the use of San Luis Obispo County's La Grande Tract as a "natural buffer area";
- (3) Ensure that Oso Flaco Lake Natural Area be unchanged. In State Parks' recent draft PWP, the Oso Flaco Lake area was proposed for a new southern entrance – this is contrary to Coastal Act policies concerning (a) development on Environmentally Sensitive Habitat Areas and (b) the conversion of agricultural lands. It's also adamantly opposed by residents and visitors, and contrary to Environmental Justice policies which have become increasingly important and regulated by the Coastal Commission.
- (4) Finally, please ensure that State Parks actually does reduce ODSVRA emissions by 50% in five years, so that local residents can breathe better air and avoid adverse health impacts.

Thank you for your consideration.

Kara A. Woodruff, Attorney
Central Coast Conservation
Friends of Oso Flaco Lake

APCD_slcleanair

From: Laurance Shinderman <lshinderman@sbcglobal.net>
Sent: Thursday, May 2, 2019 11:46 AM
To: info@slcleanair.org
Subject: [EXT]Public workshop comments

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If budgetary issues are used as an excuse for foot dragging on enforcing the stipulated agreement there's a very simple remedy; raise the entrance fees to the park.

Take a page from Uber and major cities in the United States and even Caltrans...and implement congestion pricing.

When the demand is higher, the fees are higher.

Now of course there will be the lament that it will impact lower income people. My retort is nonsense. The cost of the rigs and campers and provisioning for their "celebration of life" as they describe it are not "chump change".

So increasing the fees on the thousands of visitors would be but a drop in the bucket. Gas prices rise during the summer for any number of "manufactured" reasons by the oil companies and the dune riders accept the increases without question to enjoy their passions. So a few dollars more would not impact their fun.

If they are causing the mayhem and causing health issues; then they pay a few dollars more.

Sent via "two tin cans and a string!"

APCD_slcleanair

From: Martin Akel <akelassoc@earthlink.net>
Sent: Thursday, May 2, 2019 1:57 PM
To: info@slcleanair.org
Subject: [EXT]Reaction To Dunes Dust Public Workshop

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

Dear Members Of The APCD:

Thank you for continuing to do battle with State Parks over the particulates launched into the air by off-highway vehicles on the Oceano Dunes.

At the May 1st Public Workshop the scientific evidence presented was conclusive — there's a definitive link between OHV activity and unhealthy conditions on the Nipomo Mesa. This was accepted so very long ago by the previous Parks Deputy Director, Matt Fuzie! Now it's finally time to lock down a significant solution.

1. No Excuses: Do not accept any further excuses from State Parks about implementation of the most recent plan.

- **Funding:** State Parks can find the money if they want. They have reserve funds, California has funds, and Parks can even charge modestly higher fees if they desire. To use money as an excuse for inaction puts the long-term health of thousands of citizens at major risk. The lives of our local citizens are far more precious than the ability to ride the dunes unchecked and without accountability.

- **Timing:** State Parks has dragged their feet year after year, slowing the process and obfuscating the issues. Meanwhile, our friends and neighbors' lungs are accumulating toxic dust ... particulates that may shorten our lives. So do not accept more delays. Please set target dates and demand that Parks meets those dates or otherwise incur hefty fines. And there's still time to have a greater impact on the problem in 2019. Insist that a maximum effort be made this year.

2. Independent Implementation/Monitoring: Please do not allow the fox to be in charge of the hen house. The Project Manager to be hired must have the freedom to make judgement calls without worrying about upsetting one party or the other. If the person is beholden to one group, politics and self-interests will rule, and this distressing, divisive drama will continue to drag on. Independence please!

My many friends and neighbors here on the Mesa truly appreciate your efforts. We'll be following your decisions and actions closely and with great anticipation. Please do not allow the current solution to be watered down or fade away. Instead, strengthen it!!! Be bold and protect your fellow County citizens!

Sincerely,
Martin & Myra Akel

MARTIN & MYRA AKEL
968 Jacqueline Place, Nipomo, CA 93444
T: 805.219.0208 - akelassoc@earthlink.net

APCD_slcleanair

From: Bruce Berlin <brucedberlin@gmail.com>
Sent: Sunday, May 5, 2019 5:08 PM
To: info@slcleanair.org
Subject: [EXT]California State Parks OHV & Oso Flaco Plans

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

Dear APCD-

I was not able to attend the APCD meeting the other night in Arroyo Grande.

I do appreciate your efforts to keep the public informed on the various air quality improvement projects under way and in the plans for the near future. It is still problematic in the fact that the air in South County SLO, in particular, continues to consistently pose a significant health risk for those of us that live here.

If State Parks (with the cooperation of APCD) wish to continue to operate Oceano Dunes for off-highway vehicle activity, please do so in a manner that is consistent with state and federal law. Specifically, please proceed as follows:

- (1) Ensure that any take of special status species (including snowy plovers and least terns) is pursuant to a valid Habitat Conservation Plan under the federal Endangered Species Act, which is long, long over due;
- (2) Ensure that the Oceano Dunes activities are consistent with the Local Coastal Program (as certified by the Coastal Commission in 1983), including the use of San Luis Obispo County's La Grande Tract as a "natural buffer area";
- (3) Ensure that Oso Flaco Lake Natural Area be **unchanged**. In State Parks' recent draft PWP, the Oso Flaco Lake area was proposed for a new southern OHV entrance – this is contrary to Coastal Act policies concerning (a) development on Environmentally Sensitive Habitat Areas and (b) the conversion of agricultural lands. It's also adamantly opposed by residents and visitors, and contrary to Environmental Justice policies which have become increasingly important and regulated by the Coastal Commission; and
- (4) Finally, please ensure that State Parks actually does reduce ODSVRA emissions by 50% in five years, so that local residents can breathe better air and avoid adverse health impacts. I encourage you to closely evaluate their progress, and look to be sure they are close to a 10%-15% reduction **each year** from 2019 thru 2024, so we get to the target 50% reduction.

If they are not successful in reaching their 50% target, then the immediate **closure of the OHV** should happen and stay in effect until the State Parks can demonstrate the 50% reduction and an ongoing plan to reduce particulate matter. They have talked about this too long, and done a poor job in addressing the problem with good science and resources.

--

Thank you for your time and allowing me to express my opinion on this matter.

Bruce Berlin
Native Plant Ecologist
Arroyo Grande

APCD_slcleanair

From: Jean Baker <jbakerlcsw@gmail.com>
Sent: Wednesday, May 8, 2019 2:04 PM
To: info@slcleanair.org
Subject: [EXT]Oceano Dunes DPMRP

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The meeting on May 1st was the first one that I have attended and I would like to compliment the officials in maintaining order and sharing the science thus far collected. My take-away from the meeting is that the science is showing that the use of the Dunes by ORVs is causing increased air pollution. This particulate matter is causing health related problems for the people that live downwind of the dunes.

It is difficult for people to give up what they have enjoyed. Therefore, I can empathize with the side that wants to retain the Dunes as they have been used in the past. However, as we evolve as a species and live on this planet, there are some irrefutable facts that must be considered. The health of humans must override pleasure. Folks weren't happy when they couldn't smoke in public places anymore but we have evolved for the sake of human health. In addition, there is the health of the planet to consider and I believe we will reach a point where unnecessary travel by combustible engines will be limited. The Dunes ORV is certainly a place to start.

Though the following comment doesn't focus on the particulate matter, it does focus on human health. There are deaths and serious injuries associated with riding on the dunes. I would like to access this data and, if it is significant, I really don't understand why a State run facility would be willing to jeopardize safety when this is an elective endeavor.

Thank you for allowing me to voice my opinion.

Jean Baker

APCD_slcleanair

From: Lisa Roeder <roederspeech@aol.com>
Sent: Wednesday, May 8, 2019 7:55 PM
To: info@slcleanair.org
Subject: [EXT]Citizen concerns

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

Hello,

With respect to the DPMRP, if the APCD and State Parks wish to continue operating Oceano Dunes for off-highway vehicle activities, you must do so in a manner that is consistent with state and federal law.

Specifically, ensure that any take of endangered species (including snowy plovers and least terns) is pursuant to a valid Habitat Conservation Plan under the federal Endangered Species Act, which is long, long overdue;

Also, don't destroy Oso Flaco Lake Natural Area. In State Parks' recent draft Public Works Plan, the Oso Flaco Lake area was proposed for a new southern OHV entrance – this is contrary to Coastal Act policies concerning (a) development on Environmentally Sensitive Habitat Areas and (b) the conversion of agricultural lands. It's also adamantly opposed by residents and visitors, and contrary to Environmental Justice policies which have become increasingly important to and regulated by the Coastal Commission; and

Finally, please ensure that State Parks actually does reduce ODSVRA emissions by 50% in five years, so that local residents can breathe better air and avoid adverse health impacts.

Lisa

Sent from my iPad

APCD_slcleanair

From: Linda Reynolds <lreynolds151@gmail.com>
Sent: Thursday, May 9, 2019 12:30 PM
To: info@slcleanair.org
Subject: [EXT]comment on the particulate matter reduction plan

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

There is a lack of urgency in the document and it seems with the agencies involved. I have watched this issue as well as lived with the negative consequences for several years. Having attended many, many meetings it seems only band aide proposals are made and with no serious time frames for results are given.

Only 22 acres of new fencing is planned for the foredunes for 2019. Over the years I have seen the fencing semi buried by the sand and activity on the dunes in no time. Totally ineffective.

Why does a state as rich as California have an agency like state parks complain about lack of funds to complete quickly the necessary and effective

solutions of control of the dunes? So far, only window dressing.

Close the most emissive areas now. Take care of the tax paying local residents who are suffering the severe health and life style consequences.

Linda Reynolds
Nipomo, Ca

APCD_slocleanair

From: noreply@slocleanair.org
Sent: Friday, May 10, 2019 2:07 PM
To: info@slocleanair.org
Subject: [EXT]Contact Submission

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

name: Dena Neill

email: denaneill@gmail.com

message: I'm writing in response to reducing dust in Oceano. I think the idea of a foredune is a step in the right direction, we are risking innocent people's health over recreation. It's time to make a change for clean air, thank you for your time, D.Neill .

APCD_slocleanair

From: Ed Harris <movieln2@gmail.com>
Sent: Friday, May 10, 2019 6:09 AM
To: info@slocleanair.org
Subject: [EXT]State Parks Particulate Matter Reduction Plan

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Please ensure my comments are entered into the record.

The Scientific Advisory Group recommendations were not totally accepted. State Parks needs to respect the input of the experts; it agreed to do so. **Mitigation in 2019 in concert with its recommendations should be added and undertaken THIS year.**

The Project Manager must be an INDEPENDENT consultant; not a State Parks employee, especially one with extra duties. The consultant should be dedicated to the success of this project.

Thank you.

Ed Harris

APCD_slcleanair

From: rachel toti <rachelletoti@gmail.com>
Sent: Friday, May 10, 2019 2:23 PM
To: info@slcleanair.org; Gary Willey; Karperos, Kurt@ARB; Ian Walker; Lisa.Mangat@parks.ca.gov; Dan Canfield; secretary@resources.ca.gov; John Ainsworth
Subject: [EXT]Comments on the Draft Particulate Matter Reduction Plan
Attachments: Clear Creek.jpg; Table 1 DRI Pilot Projects (2).jpg; Pg 15 of 50.jpg; Pg5 CDP Amend. # 2.jpg; dunes self-restore.jpg; 3.jpg; Dune Preserve.JPG

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Draft Particulate Matter Reduction Plan Comments

I would like to submit the following comments on the March 28, 2019 Draft Particulate Matter Reduction Plan.

The revised plan did include more specifics and incorporated some of the recommendations from the SAG and APCD Director. There are several areas which could be improved further. It is puzzling to me that when the Scientific Advisory Group said the fore dunes should begin immediately, they are scheduled for October 2019. It has been State Parks pattern to delay and delay and that does not appear to have changed.

Overall there is a lack of urgency in this document. The SOA stated the Plan was to attain air quality standards as "expeditiously as practicable". Yet, for 2019 only 22 acre of new fencing is planned for a fore dune area and planting 48 acres that were closed in 2018. So in the first two years of a five year process, only 150 or so acres of mitigation will occur. Then we wait until August 1, 2020 to see what will happen thereafter. This is not expeditious. The Hearing Board did not mean you can take four years to get this done. They meant get it done ASAP but no longer than 4 years.

The Plan omits several low-cost options including: Fencing areas to stop disturbance and let them self-restore; moving the fences away from existing vegetation and allow the established plants to expand. It is well documented that the dunes self-restore and plants begin to grow when riding activity stops. Here is a sentence from the Coastal Commission staff report on the original permit. "The dune vegetation around Oso Flaco Lake is re-establishing itself on its own. The dunes themselves have hardened and stabilized. The area is being utilized once again by fishermen, hikers, birdwatchers and picnickers." Copy attached.

The Coastal Development Permit for this park requires that fencing be 100 feet away from the vegetation. That provision has not been enforced by the Coastal Commission with devastating effects. I recommend that the fencing be moved away from the existing vegetation and allowed to spread. See photo. This may take some time, but you will have large healthy plants getting established. There is a large emissive area, just south of Pavilion Hill Vegetation Island, which is not being addressed. It would be pretty simple to add a loop of fencing from Pavilion Hill to enclose the hot spot. Part of this area is the beginning of the "sand highway, which is not a highway, just a series of posts in the sand as markers. I have noticed that the pattern of hot spots or emissive areas roughly follows the sand highway. I would recommend studying and addressing that problem if it is confirmed.

The Special Master specifically mentioned restricting riding activity and riding area. This pertains to Intensity of Use which is also a provision in the CDP. Obviously, if there is less riding area, there should be fewer riders. The OHMVR Act provides for areas that are eroding, as this park is, to be closed and restored. It happens in other ohv parks, why doesn't it happen here? In 2007, the California Geological Survey conducted a study of the vegetation islands and made the recommendations to 1) rotate riding areas and 2) establish a fore dune. State Parks chose to ignore those recommendations and so is responsible for the air pollution problem and the many upset off-roaders. If they had just said, look we have a problem, and we are going to do the right thing, it would not have come to a Hearing Board/legal situation. In 2011, DRI identified reducing surface disturbance as a "very low cost" means to address the problem (see attached chart). If funding and cost really are concerns of State Parks, why not follow this recommendation.

The Special Master discouraged the use of wind fences and straw bales as not natural solutions. If the inclusion of these measures are temporary to assist in the establishment of the seedlings, I understand that. But the placement and removal process State Parks has done in the past should not be allowed. First, it is expensive and ugly and second, if it changes the CDF readings and then is removed, it gives a false impression of the results of the actual mitigation.

Objectives Comments

Objective 5 - should include expert validation that both the DRI model and the CARB model produce similar results in terms of location and scale of mitigation. Also, the APCO asked for an explanation of why the DRI model is being used in place of the CARB model which I don't find in the draft PMRP.

Objective 6 – Back Dune restoration should be fenced off this year and planted at a later date, not delayed until Sept. 2020. Just fencing it off will reduce its emissivity and help with the goal of achieving the State Standard of 50 micrograms.

Objective 7 - Deploying Seasonal Wind Fencing should not be an objective. Delete this one and make Closing the Most Emissive Areas an objective. It should be number 4, after developing the fore dunes. Addressing the High Emissivity Dust Control Areas mentioned on page 5-15 should be a high priority. Fence them off and letting them self-restore until planting can be done.

Asbestos and Crystalline Silica are known carcinogens which are present in the ground and can be disturbed by ohv activity. The 2008 Soil Conservation standards recognized this and wrote “ Naturally occurring minerals such as asbestos and silica may be exposed on ground surfaces at an OHV facility. There is a potential for OHV activity to disturb these minerals. When airborne, these minerals can be a health concern. Mitigation measures to control the airborne release of these minerals may be needed.” It is concerning that this plan mentions State Park's consultant's studies show “no evidence of realistic pulmonary (inhalation) risk with respect to airborne crystalline silica”. But does not mention the APCD samples showed 20 micrograms per cubic meter was present. The California Office of Environmental Health Hazard Assessment has established a Reference Exposure Level (REL) for respirable silica of 3 micrograms per cubic meter. I recommend that we find out what the REL is on the Nipomo Mesa and in Oceano.

In 2008, a U.S. EPA study showed that riders in the Clear Creek Management Area of Northern California were exposed to unsafe asbestos levels from dust being entrained into the air from the ohv vehicle in front of them. See [/archive.epa.gov/region9/toxic/web/html/risk.html](http://archive.epa.gov/region9/toxic/web/html/risk.html). As a result, the BLM closed some of the riding area or converted it to non-motorized recreation. If the crystalline silica reading a mile outside of the riding area is 20 micrograms, what could it be in the riding area?? I would think State Parks would like to know that so they could advise their visitors.

The use of the 1930"s aerial photos for restoration purposes does not take into account the amount of growth and new plants that would have been present, but for, the poor management of the park. In the Pismo Dune Preserve, and around Oso Flaco Lake the vegetation increase is considerable. See photo of Dunes Preserve. The mitigation plan should include an estimate of what vegetation would be present had the dunes been left undisturbed for the past 40 years. I think it would be more than 80 acres.

I am an avid gardener. I have toured the State Parks greenhouses in Oceano and was impressed with the time and manpower put into gathering the seeds and germinating native plants. Another, faster approach would be transplantation. I personally transplanted blue and yellow lupine into my yard. The plants do go into shock, but come out eventually and survived. I had a blue lupine bush about six feet in diameter, after 2-3 years. The SAG should consider transplanting plants from the vegetated islands, the Dune Preserve, Pismo Beach, campgrounds, etc. Where ever there is crowding of native plants. I think if done quickly, the shock is minimized and you could quickly have improved coverage. Another idea is to contact Native Sons, a nursery in Nipomo that specializes in growing and selling native plants. They have large plants for sale.

Thank you for the opportunity to provide my thoughts. I hope you will take the appropriate actions to quickly address the air pollution problem that has been dragging on for more than ten years.

Sincerely,

Rachelle Toti

Nipomo Mesa Resident





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For Immediate Release, May 2, 2008

Contact: Chris Kassar, (520) 609-7685

Center Applauds Closure of Clear Creek Management Area for Public Health and Endangered Species Protection

HOLLISTER, *Calif.*— The Bureau of Land Management closed to the public over 30,000 acres of the Clear Creek Management Area in response to a multi-year Environmental Protection Agency report that concluded that the carcinogenic asbestos stirred up by motorcycles, all-terrain vehicles, and sport utility vehicles pose a serious health risk to visitors.

"It's about time that the agency steps in to protect public health," said Chris Kassar, a biologist with the Center for Biological Diversity. "The EPA study confirms that asbestos levels and toxic dust kicked up by off-road vehicles is a much greater health hazard than previously thought, and the Bureau of Land Management is going to have to be very careful about how they manage this area in the future."

The Clear Creek Management Area, near Coalinga in San Benito and Fresno Counties, contains one of the largest naturally occurring asbestos deposits on Earth, and the land is dotted with abandoned asbestos and mercury mines. Visitors entering Clear Creek's 30,000-acre "red zone" see signs warning of asbestos exposure and are warned to avoid breathing dust and drinking water from the area.

The EPA has been reporting high levels of asbestos for years, but the recent assessment is the most conclusive reporting alarming statistics like the fact that five visits a year to the Clear Creek Management Area over three decades could lead to lung cancer and other crippling diseases.

Protecting public health isn't the only concern in the area. The Center for Biological Diversity and the California Native Plant Society filed suit in federal court in 2004 in an effort to get the Bureau of Land Management to manage off-road vehicle abuse until it acted to protect the threatened San Benito evening primrose, a wildflower found only in the Clear Creek area. About two-thirds of the area's colonies of the primrose have been harmed by off-road activity, and one colony of 1,476 plants was wiped out by off-road drivers between 2000 and 2003. As a result of this lawsuit, off-road use was officially restricted to 242 miles of trails to protect the primrose and other fragile species.

For a link to the EPA study, [click here](#).

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mrkr #3

la grande trac

dune preserve



encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and maintaining alteration of natural streams.

Based upon the statements of the Department of Parks & Recreation verified by on-site observations of management effectiveness by the Director of the South Central District of the Coastal Commission during the memorial day weekend (1983). The Commission finds that the proposed amendment to coastal permit #4-82-300-A is consistent with the above Coastal Act requirements to those further described in the Commission staff reports and findings for coastal permit #4-82-300.

Since August 1982 the following actions have been undertaken by the DPR and others to comply with and implement the management program required by permit #4-82-300-A.

- a. Protective fencing is proceeding on schedule, significant areas already fenced off are recovering and unauthorized OHV intrusion into them has virtually ceased.
- b. In excess of 1 million dollars has been allocated to the revegetation program by the OHV Commission and the program is underway.
- c. The dune vegetation around Oso Flaco lake is re-establishing itself on its own. The dunes themselves have hardened and stabilized. The area is being utilized once again by fishermen, hikers, birdwatchers and picknickers.
- d. A barrier has recently been placed at Oso Flaco Creek to prevent OHV intrusion south into the sensitive Guadalupe Dune and Santa Maria River area.
- e. Volunteer OHV groups have established an effective patrol force which assists state parks enforcement personnel in controlling unauthorized vehicle activity (communication from Ross Henry DPR, Mike Bishop OHV Commission, observation J. Ryerson May 28, 1983).
- f. The Park unit has been budgeted 5 additional "permanent/intermittent" (9 mos. year) ranges with peace officer authority and 10 "seasonal" personnel to patrol and manage OHV activity (Communication Ross Henry DPR).
- g. The serious accident rate within the park has been significantly diminished (Ross Henry).

As with any program faced with the task of regulating a high intensity motorized recreational activity within an area having sensitive natural resources and residential community values, the implementation of the aforementioned management program has not been entirely successful. Up until May of 1983 no effective barrier to OHV intrusion south of Oso Flaco Creek had been emplaced. The result was serious degradation of the dune system south of the creek. An effective barrier is now in place.



- Naturally occurring minerals such as asbestos and silica may be exposed on ground surfaces at an OHV facility. There is a potential for OHV activity to disturb these minerals. When airborne, these minerals can be a health concern. Mitigation measures to control the airborne release of these minerals may be needed.
- Wildlife
 - There may be potential wildlife concerns with regard to an OHV project. Potential wildlife issues for an OHV facility can be assessed by first consulting the California Natural Diversity Data Base (CNDDDB), maintained by the California Department of Fish and Game (DFG). The CNDDDB can be accessed via the DFG website (www.dfg.ca.gov). The CNDDDB provides information on various species of concern in California.
 - Additional assessment may entail the development of a Wildlife Habitat Protection Plan (WHPP). A WHPP includes a description and survey of threatened, endangered, and sensitive plants and wildlife and wildlife habitat in the area of OHV activity.
 - Depending on the species, avoidance or other protective measures may need to be implemented at an OHV facility to more effectively integrate the facility with its natural surroundings and inhabitants.
 - If a species of concern occurs in the vicinity of a project, studies regarding impact of the project on the species may be needed.
- Cultural and Historical Resources
 - Cultural and historical resources within or adjacent to an OHV project should be identified so that the OHV project can be designed to minimize potential impacts to the features.
 - Sensitive areas, such as habitat for endangered wildlife and vegetation, and paleontological (fossil) sites, should be known and delineated, if necessary. OHV access to these areas may need to be limited.
 - Open-ride-area OHV activity may need to be limited in vegetated areas.
 - The location and number of parking areas, campsites, and access routes should be minimized to reduce potential impact to the environment. These OHV facility features should be located on naturally flatter areas to minimize grading.

2.3.5. Erosion Potential Assessment

The primary purpose of an erosion potential assessment at an OHV facility is to identify areas which may be inherently more prone to erosion, and consequently may need specific drainage and erosion control design considerations. Several approaches can be used to estimate the potential for erosion on OHV facility lands. However, most large-scale methods of assessing erosion potential do not account for erosion susceptibility of trail tread. They are, however, useful in providing an assessment of erosion potential of

E. Protective Fencing of Dunes, archaeological resources, and wet environments shall be accomplished in the following manner subject to review and approval by the Executive Director of the Coastal Commission in consultation with the County of San Luis Obispo and the State Department of Fish and Game.

(a) Fencing proposed and approved herein, plus fencing of the area shown as Area A on Exhibit D plus the perimeter fencing along Sand Highway (or along the ridge just eastward of the Sand Highway) and the eastern boundary of the PDSVRA shall be accomplished by November 30, 1982. All other vegetated areas indicated on Exhibit D shall be fenced by August 31, 1983.

(b) One primary objective of the fencing is to prohibit vehicle access to the dune area south of Oso Flaco Creek. Accordingly, the east/west aligned fence north of Oso Flaco Creek shall continue seaward to the mean low water line so that vehicles do not pass to the south. The continuation of this line to mean low water may require a different construction than normal fencing - possibly driven piles.

(c) Except for the following, fencing alignments shall be placed a minimum of 100 feet from the vegetated areas being fenced:

1. Along Sand Highway where the fence would encroach into the Sand Highway travel corridor.
2. Along the seaward side of the foredunes paralleling the beach where fencing may be placed in a manner similar to that already existing along the westerly line of the State Dune Preserve except that a minimal number of breaks in the foredune fencing outside of the dune preserve may be allowed for OHV access to the backdune area. The fencing protecting the foredunes need not be a closed perimeter fence completely surrounding the foredune vegetation if it can be demonstrated to the Executive Director that such perimeter fencing is not necessary for effective preservation and stabilization of the foredunes.
3. In other areas where it can be demonstrated that a placement closer to the vegetation will not diminish the effectiveness of the fence to stabilize the dune, protect the vegetation and provide the necessary conditions for dune rehabilitation and restoration. Said demonstration shall be in the form of competent analysis of the dynamics of dune sand transport and the natural conditions necessary for dune stabilization. Reductions in the minimum setback under this condition shall be reviewed and approved by the Executive Director of the Coastal Commission.

(d) If fenced corridors to the Oso Flaco Lake causeway are constructed, they shall be only for the use of State Parks personnel and for the purpose of emergency, normal patrol duties, management and enforcement. Accordingly, these corridors shall have locked gates at points shown on Exhibit D.

Given the constraints of the available funding, DRI would be able to design, supervise installation, and analyze data from one high-cost, high-effort; and two low-cost, low-effort pilot projects.

Based on our experience and understanding of the problem, the following alternatives: (1) artificial roughness, (2) vegetation, and (3) reduction of surface disturbance appear to be the most feasible, given the funding available to install and maintain Pilot Projects and analyze the data from them.

Table 1: Relative cost and effort for pilot projects

Control Measure	Cost	Effort Required
Artificial roughness elements	High	High
Vegetation	Low	Low
Straw checkerboards	Very High	Very High
Reduce surface disturbance	Very Low	Very Low
Sand fences	Very High	Very High
Surface cover	High	High

Implementation Plan

Following a decision on selection of the Pilot Projects, DRI will work with CSP and other stakeholders to implement the chosen Stage I Pilot Projects.

In this phase, DRI will undertake the following tasks:

1. For each selected Pilot Project
 - a. provide detailed design and list of instrumentation required
 - b. work with CSP to determine optimal siting and logistics
2. Final site selection in field
3. PI-SWERL measurements of emission prior to pilot project installation
4. Oversee installation of pilot projects in field
5. Analyze sand flux and wind data collected in field
6. Provide reporting on results

APCD_slcleanair

From: Ron Hovden <hovdenr@gmail.com>
Sent: Monday, May 13, 2019 9:45 PM
To: info@slcleanair.org
Subject: [EXT]Oceano Dunes

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

Sure, nature blows particulate emissions from the dunes! However, scientific studies show that emission concentrations and total daily flows from the riding area are anywhere from four to ten times the natural level.

The compromise goal of a 50% emissions reduction means that riding would still double the natural emission levels. An improvement, for sure, but can't we do better than that, when we're still talking about tens of tons of emissions on dry, windy days?!

In the interest of public health, the ODSVRA riding area needs seasonal and daily openings and closings based upon historical and current wind and dryness conditions.

APCD_slcleanair

From: Dorothy Modafferi <tdmod7@icloud.com>
Sent: Tuesday, May 14, 2019 9:54 AM
To: info@slcleanair.org
Subject: [EXT]Oceano Dunes OHV Park dust pollution

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

I have a house in Nipomo and have been adversely affected by the particulate matter air pollution from the Oceano Dunes OHV Park. I follow the daily air pollution reports, stay inside with windows and doors closed on days of adverse air pollution, and turn on air filters machines that I have had to purchase to clean the air within my home, and am on medication and inhalers to help me breathe. I now have to leave the area in spring, summer, and fall because of increased damage to my lungs since moving to Nipomo.

It seems to me that the argument that State Parks has neither the money or personnel to fully fulfill their agreement to reduce the air pollution is negated by the amount of money and personnel used to study and write the proposed addition to the riding area and new camp by the Oso Flaco area. This money should be spent to reduce the current air pollution going towards the Nipomo Mesa residents before even thinking of additions to the park.

Scientists have shown how to reduce the air pollution. It is incumbent on State Park officials to enact the solutions scientists have shown that will mitigate the air pollution going towards the residents of the Nipomo Mesa.

This issue is unique to the Oceano Dunes — nowhere else along the coast is there the same particulate pollution that comes from this area. Interestingly, Oceano Dunes is also the only OHV park along the coast. Conclusion: the air pollution is caused by the off highway vehicle activity.

Recent Wild West conditions at the State Park resulting in multiple accidents, two deaths, and shootings shows that State Parks is not even handling the safety of the campers and riders.

This is an urgent health hazard to Nipomo Mesa residents and needs to be taken seriously with all scientific actions necessary to clean up the air as quickly as possible.

Sincerely,

Dorothy Modafferi
Nipomo, CA

APCD_slocleanair

From: Ilona Shakibnia <ilonashak@sbcglobal.net>
Sent: Tuesday, May 14, 2019 3:24 PM
To: info@slocleanair.org
Subject: [EXT]Draft Particulate Matter Reduction Plan Comments

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

To whom it may concern:

I would like to comment on the DPMRP and the State Parks' recent Public Works Plan.

The proposal of a new southern off road vehicle entrance near Oso Flaco lake is vehemently opposed to by our communities in SLO and SB counties and is contrary to Coastal Act policies concerning (a) development on Environmentally Sensitive Habitat Areas and (b) the conversion of agricultural lands. These proposals are contrary to Environmental Justice policies which have become increasingly important to and regulated by the Coastal Commission.

Please insure that State Parks actually does reduce ODSRVA emissions by 50% in five years so that local residents can breathe better air and avoid adverse health impacts.

If Oceano Dunes is going to continue with OHV activities, it must proceed in accordance with all state and federal law. Additionally, all matters regarding endangered species must be done in accordance with a current/ recent Habitat Conservation Plan under the Endangered Species Act. I think we have enough work as a community to keep Oceano dunes open without opening costly litigation that would result from endangering Oso Flaco Lake.

Sincerely,

Ilona Shakibnia & Behrooz Shakibnia
3019 Bahia Court
SLO, CA 93401

APCD_slcleanair

From: Michael Daniel <2titanfans@gmail.com>
Sent: Tuesday, May 14, 2019 10:45 AM
To: info@slcleanair.org
Subject: [EXT]Dunes

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

If you want to close part or the dunes for green area, you need to open the same amount of space to the south towards Oso Flaco Lake. With less population farther south it would not be a problem to the homes that are currently having an issue with dust. Thanks for your comment page. Mike Daniel 559 410-2554

APCD_slcleanair

From: Nancy Graves <nancygraves@hotmail.com>
Sent: Tuesday, May 14, 2019 8:31 AM
To: info@slcleanair.org
Subject: [EXT]ODSVRA

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

I appreciate the efforts by your agency in updating the public on the DPMRP to reduce dust emissions from Oceano Dunes and thereby improve air quality for neighboring communities.

If State Parks (with the cooperation of APCD) wish to continue to operate Oceano Dunes for off-highway vehicle activity, please do so in a manner that is consistent with state and federal law. Specifically, please proceed as follows:

- (1) Ensure that any take of special status species (including snowy plovers and least terns) is pursuant to a valid Habitat Conservation Plan under the federal Endangered Species Act, which is long, long over due;
- (2) Ensure that the Oceano Dunes activities are consistent with the Local Coastal Program (as certified by the Coastal Commission in 1983), including the use of San Luis Obispo County's La Grande Tract as a "natural buffer area";
- (3) Ensure that Oso Flaco Lake Natural Area be unchanged. In State Parks' recent draft PWP, the Oso Flaco Lake area was proposed for a new southern OHV entrance – this is contrary to Coastal Act policies concerning (a) development on Environmentally Sensitive Habitat Areas and (b) the conversion of agricultural lands. It's also adamantly opposed by residents and visitors, and contrary to Environmental Justice policies which have become increasingly important and regulated by the Coastal Commission; and
- (4) Finally, please ensure that State Parks actually does reduce ODSVRA emissions by 50% in five years, so that local residents can breathe better air and avoid adverse health impacts.

Thank you for your consideration.

Nancy Graves
Grover Beach

APCD_slcleanair

From: russelwilson@comcast.net
Sent: Tuesday, May 14, 2019 10:12 PM
To: info@slcleanair.org
Subject: [EXT]Pismo Closure.

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It's bullshit. It's sad. I will miss having an affordable place to escape the summer heat in Fresno. We all know it's bullshit but will slide through anyway. Government bought and paid for as usual.

Sent from myMail for iOS

Cynthia Replogle

Speaking as Oceano resident and not in any official capacity

When I started my first job after college, people were allowed to smoke in the office, right next to my desk.

Sure, sometimes it made me cough and sometimes I had to leave the room to get fresh air, but it was allowed.

Then, slowly, society started to recognize the dangers of second-hand smoke - that what those smokers did for their own satisfaction had ill effects on the health of those around them.

Soon the smokers could only indulge their habit in the break room. Then they had to go outside. And then they couldn't be within 30 feet of the building entrance. For a while, it was still OK to smoke in bars. But now, some cities prohibiting smoking in any public spaces.

Because we recognize that smokers' pleasure causes non-smokers' pain.

Off-roading at the Dunes is analogous.

Off-roaders tear up the dunes with their ATVs, eliminating vegetation and damaging the natural crust, thus creating more airborne pollution. This has negative effects on the health of people on the Mesa and Oceano's Pier Avenue and the Strand. It's fun for the off-roaders, but bad for the people who live here and breathe the air.

Off-roaders' pleasure causes non-off-roaders' pain.

The area accessible for off-roading has been shrinking, but not enough. Off-roaders have other places to play that don't cause the harms to others they generate in our communities. It's time to take the next logical step and manage the park so that pollutants drop to normal, natural background levels.

APCD_slcleanair

From: tom marre <tommarre@gmail.com>
Sent: Wednesday, May 15, 2019 4:19 PM
To: info@slcleanair.org; tommarre@gmail.com
Subject: [EXT]Comment: proposed Oso Flaco entrance to Oceano Sand Dunes recreational vehicle chaos area

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

Attention: Parks department State of California

Re : considered Oso Flaco State Park modification for entrance for access to Oceano State Park

This is a comment regarding the proposed entrance to the Oceano Dunes which is open to Motor Vehicles

The Oso Flaco State Park used to be a very gnarly SLU.... it has taken more than four decades but it has come back .. it is now an excellent example of a Wetlands ecosystem... It is a glorious example of how a myriad of natural systems work together.... it is most unique and it is a jewel box.

The Oceano Dunes is an unfortunate dunes area which is regularly assaulted by the onslaught of Motor Vehicles.

Allowing Oso Flaco to be aligned with Oceano Dunes State Park in anyway while it is open to Motor Vehicles and the onslaught from Motor Vehicles will only serve to greatly damaged this delicate Oso Flaco State Park ecosystem.... to knowingly damage this ecosystem would arguably be a criminal act with intent.. this would be criminal in sence that it would lead to the ultimate decimation of the deicate Oso Flaco State Park... which would be to intentionally damage an asset of the people of the State of California

I understand it is your mission to serve as many people of the State of California as you possibly can... But you must do this without damaging your own (the people's)... assets of the people of the State of California.

The act of opening this up to public comment in no way will absolve the State Parks Department from its responsibility to maintain the integrity of State assets

The keywords in my comments are:
Damage, intent, people's assets

Tom Marré /
Nipomo, CA
805.305.0360

Tom Marré / 805.305.0360

APCD_slcleanair

From: Rosemary Nelson <rosemarynelson@me.com>
Sent: Monday, May 20, 2019 1:39 PM
To: info@slcleanair.org
Subject: [EXT]Comment DPMRP

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

It is of great concern that State Parks recent Draft Particulate Matter Reduction Plan includes language that will again allow State Parks the option of noncompliance due to a lack of financial resources.

Specifically, in the Introduction of the Plan they attempt to establish the extraordinary demands of the task. "The measurement and control of dust from an active coastal dune setting on the scale required by the SOA is unprecedented and will require a substantial investment of material, staff and economic resources by the State of California."

When State Parks fails to comply, this language will translate as "We had no idea, nor could we have possibly predicted the enormity of the work to be done."

In Article 2.3. "Other PMRP Considerations" they are more specific. "The ability of the OHMVR Division to fully implement the PMRP is particularly dependent on factors that are outside the OHMVP Division's control such as viability of funding..."

When they fail to comply, this will be expressed as "Sorry, we just don't have the money."

State Parks failed to comply with the last PMRP for these very reasons and the new agreement includes language that will encourage their non compliance again. In order to insure that SP will implement the recommendations of the SAG, the escape language must be removed and the agreement rewritten with consequences for failure to perform.

If the agreement is not rewritten there is a good chance the deadlines of the SOA will not be met. Those of us living with the problem of PM10 and PM2.5 exposure will suffer the consequences.

Rosemary Nelson
Nipomo

Sent from my iPad