

August 15, 2024

Memo: SAG Review of CDPR "2024 ARWP_APCDDraft_20240801"

From: Scientific Advisory Group (SAG)

To: Gary Willey, San Luis Obispo Air Pollution Control District

Cc: Sarah Miggins, California Department of Parks and Recreation
Ronnie Glick, California Department of Parks and Recreation
Jon O'Brien, California Department of Parks and Recreation
Karl Tupper, San Luis Obispo Air Pollution Control District

The Scientific Advisory Group (SAG) received a copy of the 2024 Annual Report and Work Plan (ARWP) that was submitted to the San Luis Obispo Air Pollution Control District (APCD) by the California Department of Parks and Recreation (CDPR) on August 1, 2024, as required under the terms of the recently revised Stipulated Order of Abatement (SOA), filed on October 18, 2022. Members of SAG had the opportunity to review the document, and herewith we provide a formal consensus review.

Summary Statement

Overall, the SAG finds the 2024 ARWP to be a detailed accounting of activities undertaken and completed in the past year. The document retains the overall structure of previous ARWPs thereby providing continuity in terms of section headings and content narrative, although this year's ARWP is notably more streamlined and easier to read. Extensive references to results from previous ARWPs (in tables and graphs) place the progress made on dust mitigation in this past year into its proper context, and Section 2.3.3 (Evaluation Metrics) is particularly useful in quantifying the progress since 2013. Importantly, the document discusses the substantial shift in how dust emissions are now being modeled and how compliance with the terms of the revised 2022 SOA is to be assessed. The Introduction section summarizes changes that have occurred since 2019, and additional details are provided in subsequent sections.

In last year's 2023 ARWP, the CDPR noted that significant progress had been made in mitigating dust emissions from the Oceano Dunes State Vehicular Recreation Area (ODSVRA), and also that the modeling results for 2023 suggested that there was compliance with the SOA. Accordingly, CDPR did not plan to take additional acreage out of the riding area (i.e., land accessible to off-highway vehicle traffic for recreation and camping) in the 2023-24 work period, as was the case for the previous year (see Figure 2-32 of the 2024 ARWP). The SAG agreed that it was prudent not to exclose any additional acreage from OHV use, and despite having reservations about CDPR's conclusion that compliance had been achieved, the SAG was supportive of the proposed planning framework outlined in the 2023 ARWP. In this year's 2024 ARWP, the evidence for compliance with the terms of the 2022 SOA is much more compelling, and the SAG supports the modeling framework and related results that have led CDPR to assess that the ODSVRA is most likely not in a condition of excess emissions at present. The SAG also agrees that there is, at this time, no reason to undertake new projects involving conversion of

land from riding to non-riding use. The proposed supplemental vegetation planting project (28.9 acres) and assorted other projects (including conversion of 12.3 acres of existing straw treatments to long-term vegetation cover) are designed to maintain the dust-mitigating integrity of previously vegetated areas, and this seems sufficient for this year's work plan, which will prioritize the continued measurement and modeling of wind and dust parameters to ensure that the overall PM₁₀ - emitting characteristics of the ODSVRA have stabilized. **Overall, then, the SAG is supportive of the 2024 ARWP and recommends acceptance of the document by the APCD.**

Suggested Changes

Page 2-12. First sentence should be “,,emissivity of PM₁₀ from the sand surface decreases.”

Page 2-19, First paragraph. Remove last sentence beginning with “This may...”

Page 2-64, Bullet Point 1) at bottom of page. “A wind speed filter was applied...” should be “A wind direction filter was applied...”

Page 2-69, First sentence under Section 2.3.2.1. “As introduced in Chapter 1,...” should be “As introduced in Section 1,...”

Page 2-77, Two-thirds down the page under Section 2.3.2.3. “(dune preserve)” should be “(Dune Preserve)”

Page 2-79, Footnote B in Table 2-9. “...substituted for the action 2022 measured emissivity values...” should be “...substituted for the actual 2022 measured emissivity values...”

Page 2-80. Last paragraph. “Nearly 90% of this managed land is located inside the ODSVRA open riding and camping area.” A qualifier needs to be inserted before “open” to indicate that the reference is to the original riding area pre-2013. The 740.1 acres of managed land are no longer accessible for OHV riding and camping (except in some cases only seasonally).

Page 2-82, Paragraph under Air Quality Indicators. This paragraph reports the number of days of high wind event days and exceedances of the CAAQS for PM₁₀. It would be useful to insert bar graphs that show all the values in parentheses so that the reader can visualize the changing trends.

Page 2-88. Section 2.4.5. **Public Relations Campaign.** SAG members continue to be disappointed by the failure of CDPR to formulate and enact a substantive public relations campaign that portrays the successful implementation of dust mitigation efforts to the public in an easily accessible format. As in past years, the 2024 ARWP provides virtually no detail on the proposed public relations campaign (Section 3.4.2), and as such, the public and various stakeholders continue to lack ready access to reliable and scientifically defensible information on overall progress that has been made to mitigate dust emissions at the ODSVRA. The link provided for the ODSVRA's Particulate Matter Information website contains only details on

meetings occurring prior to 2019 (with nothing more recent). The reference to social media posts is unsupported with links. The Implementation Schedule (Section 5) does not have an entry for the public relations campaign, suggesting that nothing is truly being planned for this upcoming work period. **The SAG encourages CDPR to take more substantive action on this important undertaking.**

Page 3-7. First paragraph under Section 3.3.1 (Meteorological and PM₁₀ Monitoring).
‘...northern dune preserve...’ should be capitalized because it is a formal name of a zone.

Page 3-7. Last paragraph on page. The first sentence under UAS Surveys indicates that three surveys are to be conducted within the 2024 ARWP Work Plan period, including a survey in October 2025. This is outside the work plan period, which according to the introductory paragraph under Section 3.3 (Field Monitoring Activities) extends from August 1, 2024 to July 31, 2025 (consistent with the extent of prior ARWPs). This is confusing because the UAS Survey in October 2025 would normally fall under the work plan for a 2025 ARWP. Indeed, this third UAS survey does not appear in the implementation schedule (Table 5-4). Perhaps a footnote to explain the discrepancy would be useful or a simple deletion of the October 2025 survey would suffice.

Respectfully,

The Scientific Advisory Group

Bernard Bauer (Chair), Carla Scheidlinger (Vice-Chair), Mike Bush, Jack Gillies, Jenny Hand, Leah Mathews, Ian Walker