

September 13, 2024

**Memo: SAG Review of CDPR "2024 ARWP\_ProvFinal\_20240911\_reduced"**

**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 revised 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 September 11, 2024. This is a slightly modified version of the original 2024 ARWP submitted to APCD on August 1, 2024, in which CDPR has responded to comments from both the SAG and APCD. As required under the terms of the recently revised Stipulated Order of Abatement (SOA), filed on October 18, 2022, the SAG needs to provide a review of each subsequent submission of a revised ARWP, and in this memo we summarize our collective opinion on the latest document.

Relatively little has been altered in this version of the 2024 ARWP, with mostly editorial modifications and insertion of clarifying sentences where needed. The main changes appear to be:

1. Figure 2-33, which shows the trends from 2019 to the present in the number of high wind event days relative to the number of days when the CAAQS were exceeded at CDF and Mesa2. The data were discussed in the accompanying paragraph, but the insertion of this bar graph nicely demonstrates that despite high wind events, the air quality at the CDF and Mesa2 monitoring stations has improved over the last three years in particular. This is consistent with other evidence showing the effectiveness of the dust-mitigation projects undertaken within the ODSVRA over the past decade.
2. Section 2.4.5 dealing with the Public Relations Campaign now provides useful links to various materials that are publicly available, which were not easily discovered in the previous version of the ARWP. This is a useful addition, and there is also a footnote that points the reader to Attachment 12, which contains information on the public relations campaign. The continuing effort to reach out to the public is also incorporated into the Work Plan, specifically as Table 5-6.
3. Figure 3-2 shows a map of the current and proposed modeling domains, as requested by APCD. This is also a useful addition, helping the reader appreciate the spatial extent of the updated model relative to the older version.

4. A new paragraph has been inserted at the end of Section 3.2.2 (Model Refinements) that describes how the dynamic nature of vegetated areas might be evaluated in the upcoming year for potential inclusion in an updated model. Whether it is feasible to include such complexity for purposes of compliance assessment will require a cost-benefit assessment based on relative effort and scientific uncertainty.

Overall, then, the SAG reiterates its earlier opinions (expressed in the review memo of August 15, 2024) that the 2024 ARWP is a detailed accounting of activities undertaken and completed in the past year as well as a thorough description of the substantial shift in how dust emissions are now being modeled and how compliance with the terms of the revised SOA is to be assessed in the future.

**Accordingly, the SAG re-affirms its support of the 2024 ARWP and recommends acceptance of the document by the APCD.**

Respectfully,

The Scientific Advisory Group

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