

September 14, 2023

Memo: Summary of Discussion on September 14 - Re excess emissions

From: Bernard Bauer, Chair, Scientific Advisory Group

To: Sarah Miggins, California Department of Parks and Recreation
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Cc: Karl Tupper, San Luis Obispo Air Pollution Control District
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Prompted by the August 21, 2023 review and recommendations from San Luis Obispo Air Pollution Control District (APCD) pertaining to the Draft 2023 Annual Report and Work Plan (ARWP) that was submitted by the California Department of Parks and Recreation (CDPR) on August 1, 2023, a meeting was called by the Chair of the Scientific Advisory Committee (SAG) for September 14, 2023 to discuss a strategy for moving forward toward satisfying the requirements of the Stipulated Order of Abatement (SOA). In particular, Section 3b of the SOA states that

"The plan shall be designed to eliminate emissions in excess of naturally occurring emissions from the ODSVRA that contribute to downwind violations of the state and federal PM10 air quality standards. By October 16, 2024, in consultation with the SAG and CARB, the Respondent shall obtain Hearing Board approval of a final excess emissions goal."

The APCD review (August 21, 2023 memo to Ms. Miggins) states that

"The District views achieving the new emissions reduction target as the most important of the SOA goals" and that for purposes of "obtaining Hearing Board approval of the final excess emissions goal, the District does not believe that the SOA requires State Parks to develop a new 'excess emissions framework' [as proposed by the SAG] such as the TPM10:TWPD analysis proposed in the ARWP."

The main outcome of our discussion today was general agreement that the excess emissions framework proposed by the SAG (with a focus on PM10 concentrations at specific monitoring stations) should not be prioritized as the main mechanism for demonstrating compliance with the requirements of the SOA. Rather, the consensus was 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-in-differences 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.

It is understood that our discussion was held after the submission of the Second Draft 2023 ARWP on September 11, 2023, and in this context, some of these consensus items summarized above may not be adequately reflected in the current version of the 2023 ARWP, without prejudice.