July 16, 2019

The California Department of Parks and Recreation (CDPR)
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And

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Response to the Notice of Preparation of a Subsequent EIR, June 17, 2019
Oceano Dunes Scientific Advisory Group (SAG)

The Oceano Dunes Scientific Advisory Group ("SAG") has reviewed the Notice of Preparation (NOP) of a Subsequent EIR released on June 17, 2019, and offers the following comments.

The NOP includes several dust control strategies that will be used to reduce particulate matter emissions from Oceano Dunes. However, the NOP does not reflect that the scope of the Particulate Matter Reduction Plan ("PRMP") is to be guided by an Adaptive Management Approach (AMA). (See PRMP section 2.2, for example. Note that all references herein are to the June 2019 "Draft" PMRP available on the SLO APCD website: https://www.slocleanair.org/air-quality/oceano-dunes-efforts.php.)

As currently drafted, the NOP appears to indicate that the PMRP's scope is static and represents the final levels of dust control needed to meet the SOA. However, the spatial extent of restoration activities described in the NOP (369 acres) is adequate only for the first year's work plan, but may be inadequate for meeting the final air quality objectives. Thus, additional dust controls and management strategies will very likely be needed in subsequent years. The spatial extent described in the NOP should be expanded to avoid the need for further CEQA approvals (and associated delays) with each new annual work plan. We suggest that the EIR should evaluate the impacts of applying dust controls to a minimum of 500 acres of open sand areas in conformance with this compliance forecast contained in Section 5.3 of the PMRP.

To provide context regarding why Parks may ultimately expand the PRMP's scope, the AMA allows for modifications to the PMRP based on the acquisition of new data that quantifies the progress towards meeting the air quality objectives of the Stipulated Order of Abatement (SOA). Specifically, new data will consist of updated dune emissivity data (as measured with the PI-SWERL instrument), and as acquired from spatially-distributed meteorological and particulate matter monitoring instrumentation (installed May 2019) interior and exterior to the ODSVRA. These data also serve as input into the agreed upon dust dispersion model (DRI Lagrangian Particle Dispersion Model) that is used to evaluate changes in PM (e.g., concentrations, key source areas, and transport patterns) in response to weather variability, dust controls, and implementing management decisions. The model-generated information will also be used to guide development of more effective dust control strategies via the AMA. Additional data to inform modifications to the PMRP (as described therein) are acquired based on the enumeration of Implementation Actions and Success Criteria (provided in the PMRP), which are designed to evaluate dust control measure effectiveness. If these metrics indicate that the control measures are not meeting their expected performance levels, modifications will be necessary to improve performance.

We are also concerned that the size of the area designated in the NOP for foredune restoration may be below the size that will allow it to be viable (i.e., below a critical threshold size to allow it to sustain itself and improve its sand trapping effectiveness). The AMA allows corrective actions to be undertaken to achieve successful dust controls. We feel that the foredune restoration, which was identified as a key management objective for dust control, is compromised by the small land area currently allocated for this critical component of the PMRP. Again, we recognize that the project ultimately proposed may differ in acreage from the PMRP's description, but we recommend that the EIR evaluate the full extent of potential mitigation at Oceano Dunes.

Respectfully,

Science Advisory Group