

June 3, 2019.

Gary Willey  
Executive Director and  
Air Pollution Control Office  
San Luis Obispo County Air Pollution Control District

Dear Mr. Willey,

**Response to the Revised Particulate Matter Reduction Plan (PMRP)  
Oceano Dunes Scientific Advisory Group (SAG)**

June 3, 2019

The Oceano Dunes Scientific Advisory Group (“SAG”) has reviewed the Revised Particulate Matter Reduction Plan (“PMRP”), prepared by the California Department of Parks and Recreation (“Parks”) on May 17, 2019.

Overall, the SAG is pleased the Revised PMRP that now includes a detailed implementation plan (“Particulate Mitigation Plan,” Section 6.3), which was lacking in the Draft PMRP of February 1, 2019. We agree with the approach of this Particulate Mitigation Plan to providing a series of measurable Implementation Actions and Success Criteria, accompanied by details on the Success Criteria (“Attachment 8”) and the Implementation Schedule (“Attachment 9”).

The SAG is also pleased to see that Parks moving forward on the urgent actions as highlighted in its report to the San Luis Obispo Air Pollution Control Officer (APCO) on February 25, 2019, including advertising for a dedicated project manager, installing additional monitoring equipment, and performing a PI-SWERL campaign to update dust emissivity maps. It is critical that Parks remain on schedule in its performance of this Implementation Plan, in order to meet the dust mitigation goals of the Stipulated Order of Abatement (SOA).

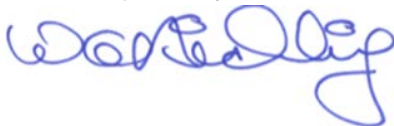
The SAG Report also included a series of technical comments. The Particulate Mitigation Plan (Section 6.3) of the Revised PMRP responds indirectly to some of these technical comments. For example, Objective 8 of the Revised PMRP acknowledges the need to revisit the baseline approach of the SOA. However, other SAG technical comments are not addressed in the Revised PMRP. For example, the SAG Response Report proposed a detailed strategy for the implementation of foredune restoration. However, a detailed foredune restoration strategy appears to remain wholly lacking in the Revised PMRP, despite a detailed strategy presented in the SAG Response Report (Section 7.1). SAG reiterates the urgency of moving forward immediately on the creation of the foredune restoration enclosure referred to in Section 6.2.1 in the PMRP and the required initial planting strategies. The SAG notes that the extent of the hypothetical foredune polygon shown in Section 6.2.1 of the PMRP (~23 acres) was identified solely for sensitivity analysis in the modelling of potential dust control measures. In comparison to nearby natural analogue reference sites at Oso Flaco Lake, however, the SAG believes that

the extent of this polygon is insufficient to promote the development and restoration of a naturally functioning foredune ecosystem, would likely occupy approximately 48 acres (see Section 7.1 of the February 25 SAG Response Report). The SAG recognizes, however, that this initial 23 acre polygon is an important first step in the foredune restoration process and that future adaptive management decisions may necessitate expanding this zone based on monitoring and assessment of foredune development and related sand flux and dust emission mitigation performance. The SAG stresses that foredune development and restoration is a critical mitigation measure that could take several years to reach full effect. Exclosure of this initial restoration area should begin immediately.

**Based on these considerations, the SAG provisionally accepts the Revised Particulate Matter Reduction Plan (05-17-2019) in its present form.** Such acceptance is conditional on a demonstration by Parks, prior to submission of its first Annual Work Plan by August 1, 2019, that it has made tangible progress toward the Implementation Actions detailed in the Revised PMRP. Such acceptance is also conditional on the performance of these Implementation Actions by Parks in a manner that is responsive to the detailed technical considerations described in the February 25 SAG Report to APCO.

(The acceptance of the Revised PRMP and the above letter were unanimously supported by all SAG members as shown by a confidential e-mail ballot sent out and collected Dr. Cheryl McKenna, a member of SAG Neuman)

Yours respectfully,



Dr. W. G. Nickling  
Special Master and Chair of SAG