

23 October 2019

Dan Canfield
Acting Deputy Director, OHMVR Division
California Department of Parks and Recreation
P.O. Box 942896, Sacramento, California 94296-0001

SUBJECT: SAG response to 15 October Draft 2019 Annual Report and Work Plan (ARWP) for Oceano Dunes SVRA produced by the California Department of Parks and Recreation OMHVR Division in Response to Stipulated Order of Abatement Number 17-01.

Dear Mr. Canfield,

Following initial concerns expressed in the 26 August 2019 letter from SLO APCD Air Pollution Control Officer, Mr. Gary Willey, the SAG was disappointed to not have been consulted in the preparation of the 1 August draft ARWP. The SAG echoed many of APCD's concerns. We are encouraged, however, by developments in the 15 October Draft ARWP, notably the recognition of our earlier recommendation for a larger 48-acre area for the foredune restoration zone, as shown in the new Exhibit 9 of the draft ARWP, which was not reflected in the 1 August draft. It is the opinion of the SAG that anything smaller than this footprint would not allow for the establishment of a viable foredune system. We also believe that implementing this full footprint will be more effective and manageable from both scientific and operational perspectives. We appreciate the multiple onsite logistical and habitat management challenges that your OMHVR Division must navigate to make this important dust emission mitigation component work. We look forward to working with OMHVR Division on the implementation and monitoring of the foredune restoration and recommend that the full polygon extents (48 acres) be put forth as soon as possible for Coastal Commission permitting and public review to avoid delays associated with piecemeal extensions of the restoration zone. We expect that OMHVR Division will move forward immediately on the permitting and public review and that the full enclosure and initial plantings will begin as soon as possible.

SAG remains concerned about the lack of ongoing consultation among OMHVR Division, APCD, and SAG during the development of major planning documents, such as the PMRP and now the ARWP. As per the terms of the SOA, OMHVR Division "will obtain an evaluation by SAG for all mitigation prior to seeking approval of each Report by the APCO" (SOA Sec. 4.e). It is our opinion that OMHVR Division has undervalued the role that the SAG could play in developing documents, given that all of its members are well-established scientists with deep knowledge and experience on relevant wind erosion, dust emission, and dune restoration processes. In addition, reaching out to SAG earlier in the writing process would likely have reduced the time needed to produce these documents, providing more time for review and reflection, and stopping the rush reviews asked of SAG because of last minute delivery by OMHVR Division.

As per the terms of the SOA (Section 4), ARWPs shall provide detailed metrics (as specified in the PMRP) for tracking progress toward dust mitigation targets. It is the opinion of SAG that the revised 2019 ARWP remains deficient in reporting these metrics, and that SAG has not been adequately included in the technical review process for metrics evaluation and planning, as required. In addition, SAG has repeatedly felt excluded from the process of plan development by OMHVR Division, only to be asked at the very last minute to provide rapid-turnaround evaluations, with insufficient time for deliberation and follow-up consultation with OMHVR Division and APCO. SAG suspects that many of these delays stem from the fact that OMHVR Division still has not filled the position of full-time On-Site Project Manager.

Despite these remaining concerns, SAG is willing to offer its approval of the 2019 ARWP provided that the following conditions are met:

1. OHMVR Division shall include in the ARWP an explicit plan to exclose, permit, and implement the full 48-acre foredune restoration zone immediately.
2. The 2019 ARWP "Implementation Schedule" (Sec. 5) shall include a table specifying a detailed process for SAG consultation and evaluation, including submission of interim reports and work plans (IRWPs) as follow-on updates to the 2019 ARWP. This table shall include the following tasks and schedules for completion:
 - a. Determine processes for obtaining values for all evaluation metrics contained in Attachment 8 of the PMRP (Oct 2019 - Nov 2019).
 - b. Obtain and report final values for all evaluation metrics for the 2019 ARWP reporting period (Dec 2019).
 - c. Prepare and submit IRWPs (1st IRWP: Dec 2019, 2nd IRWP: Mar 2020).
 - d. SAG reviews IRWPs, including evaluation metrics, to determine progress toward PMRP goals. Based on its review SAG submits adaptive management recommendations to inform creation of subsequent IRWPs and ARWPs (1st IRWP: Jan 2020, 2nd IRWP: Apr 2020).
 - e. OMHVR Division prepares an outline 2020 ARWP for consideration by SAG. This outline ARWP shall include tables specifying proposed implementation schedules for the 2020 ARWP (May 2020).
 - f. SAG reviews outline 2020 ARWP and provides initial feedback to OMHVR Division on elements to be included in the full 2020 ARWP (June 2020).
 - g. OMHVR Division prepares the full 2020 ARWP, which shall include values for all evaluation metrics for the associated reporting period (July 2020).
3. The 2019 ARWP "Implementation Schedule" (Sec. 5) shall provide a more detailed planting schedule, either through amendments to Tables 5-1, 5-3, and 5-5, or through inclusion of a new table. In Appendix A to this letter, SAG offers recommendations for elements to be included in this detailed planting schedule.
4. Each task listed above shall be completed by the last day of the final month for performance of the task. Thus, the first and second IRWPs shall be submitted no later than December 31, 2019, and March 30, 2020, respectively, and the outline 2020 ARWP shall be submitted by May 31, 2020. To ensure timely completion of these and all other

tasks included in the 2019 ARWP, we encourage OMHVR Division to consult early and often with SAG.

5. As indicated in the above schedule of tasks, going forward SAG shall be given a minimum of 30 days to review and comment on all IRWPs and ARWPs. Exceptions to this 30-day review period shall be granted only by written consent of SAG and APCO. For all other tasks requiring SAG consultation and review, SAG requests at least 10 business days for completion of SAG reviews. It is expected that OMHVR Division will adhere to these review periods to maintain effective communication and due process toward the requirements of the SOA and PMRP.
6. The ARWP shall be modified (Sec. 3.1, Sec. 3.1.2, Table 3-1, Table 3-2, Table 5-2) to refer to the specific role of the new On-Site Project Manager, separate from the Oceano Dunes District Superintendent. The ARWP shall specify that the sole function of the designated On-Site Project Manager is to oversee fulfillment of OMHVR Division obligations under the terms of the SOA. It is the opinion of the SAG that the On-Site Project Manager should not also serve as the Oceano Dunes District Superintendent. Should the OMHVR Division be unable to fill the On-Site Project Manager position by December 2019, as specified in Table 5-2 of the ARWP, OMHVR Division shall detail an existing State employee to serve as a full-time Acting On-Site Project Manager, starting on or before January 1, 2020, and until such time as a permanent On-Site Project Manager is hired.

Based on our collective scientific judgement, and pending incorporation of the above recommendations, the SAG is prepared to provide approval for the 2019 ARWP. SAG requests that OMHVR Division respond fully to these changes by 6 pm on 31 October 2019, and we encourage you to consult with the SAG as needed.

We appreciate the work that you have done in preparing the 2019 ARWP and trust that you will be able to make the required edits, so that we can move forward on this very important project.

Yours Sincerely,
The Scientific Advisory Group

Dr. William Nickling, Chair of SAG
Dr. Raleigh Martin; Dr. Ian Walker; Dr. Jack Gillies; Dr. Cheryl McKenna-Neuman;
Ms. Carla Scheidlinger; Mr. Earl Withycombe; Mr. Mike Bush

Cc: Mr. Gary Wiley, Executive Director - Air Pollution Control Officer, San Luis Obispo County
Air Pollution Control District

N.B. All members of the SAG have contributed to the above letter and have approved it by vote on Oct 23, 2019, either by conference call or by e-mail. The vote was unanimous.

Appendix A

SAG Planting Recommendations

23 October 2019

Accompanies "SAG response to 15 October Draft 2019 Annual Report and Work Plan (ARWP) for Oceano Dunes SVRA produced by the California Department of Parks and Recreation OMHVR Division in Response to Stipulated Order of Abatement Number 17-01,"

Overview

Here, SAG presents a calendar for the completion of Tasks required to assure that planting can be done as required at the appropriate time of year (Table 1). For this calendar, it is assumed that planting will be completed in November through January. Assumptions for the numbers of plants required are that the foredune areas require 650 plants/acre (Tables 2 and 3), and the back dune areas require 2,800 plants/acre. A list of species suitable for foredune areas is provided in Table 3; a species list for back dune areas is provided in Table 4. SAG welcomes discussion and concurrence on species selection with Ronnie Glick at Parks.

Table 1. Planting schedule for the coming year

Task	Deadline / period of completion	Notes
Calculate plant numbers and species for the upcoming planting.	Feb. 1, 2020	This determination will be made by Ronnie Glick at Parks in consultation with SAG. For back dune areas, assume 2800 plants per acre. For foredunes, assume 650 plants per acre
Determine the capacity of growing facilities for the State and for Cal Poly.	Feb. 15, 2020	For total numbers, assume the numbers per acre as above, plus 10% to allow for losses.
Execute contract(s) for seed collection and cleaning.	Mar. 1, 2020	Include a clear statement of the seeds required per species, with an expectation of getting at least 1.5 times the required amount. Assume also that 10 seeds are needed to result in one good plant.
Seed collection and cleaning.	March-July, 2020	Collection efforts to be done at appropriate time for each species.
Execute contract(s) for propagation.	Apr. 1, 2020	Priority given to Cal Poly and Parks; any remaining to go to commercial facility.
Provide cleaned seed to propagation facilities.	Aug. 1, 2020	Provide at least 1.5 times the required number of seeds.
Seed dropped	Aug. 15, 2020	Initial sowing; subsequent husbandry at discretion of facility
Execute contract(s) for planting.	Sep. 1, 2020	Use the most cost-effective methods and contracting entities available, based on areas to be planted.
Execute contracts for other related services (straw, transport, water supply).	Sep. 1, 2020	To be based on issuance of Request For Proposals with acres and locations clearly identified.
Plants ready for planting in the dunes	Nov. 1, 2020	
Plant installation in dunes	Nov. 2020-Jan. 2021	

Table 2. Foredune vegetation spacing assumptions

Amount	Unit
25	Feet between clumps
625	Square feet per clump
70	Clumps per acre
9	Plants per clump
627	Plants per acre

Table 3. Foredune species list, as per the PMRP

Species name	plants/acre
<i>Abronia maritima</i>	40
<i>Abronia latifolia</i>	40
<i>Achillea millefolia</i>	300
<i>Ambrosia chamissonis</i>	75
<i>Atriplex leucophylla</i>	40
<i>Cakile maritima</i> (non-native)	75
<i>Elymus mollis</i>	40
<i>Malacothrix incana</i>	40
total	650

Table 4. Back dune species list and planting densities

Plants/acre	Species Abbreviation	Species
300	ACMI	<i>Achillea millefolium</i>
100	ACGL	<i>Acmispon glaber</i>
100	AMCH	<i>Ambrosia chamissonis</i>
100	ASNU	<i>Astragalus nutallii</i>
100	ATLE	<i>Atriplex leucophylla</i>
100	CACH	<i>Chamissoniopsis cheiranthifolia</i>
300	COFI	<i>Corethrogyne filaginifolia</i>
300	ERER	<i>Ericameria ericoides</i>
e150	ERBL	<i>Erigeron blochmaniae</i>
150	ERPA	<i>Eriogonum parvifolium</i>
300	ERST	<i>Eriophyllum staechadifolium</i>
150	ERIN	<i>Erysimum insulare</i>
300	LUCH	<i>Lupinus chamissonis</i>
100	MOCR	<i>Monardella crisper</i>
50	OEEL	<i>Oenothera elata</i>
200	SEBL	<i>Senecio blochmaniae</i>