

January 15, 2020

Memo: SAG Comments on the Initial Proposal for 2020 Dust Control Projects

From: The Scientific Advisory Group (SAG)

To: Jon O'Brien, California Department of Parks and Recreation
Liz McGuirk, California Department of Parks and Recreation
Gary Willey, APCO, San Luis Obispo County Air Pollution Control District

Cc: California Air Resources Board (CARB)

Background

The amended Stipulated Order of Abatement (SOA), issued by the San Luis Obispo Air Pollution Control District on December 9, 2019, required the California Department of Parks and Recreation (Parks) to propose locations for 40 acres of seasonal dust control projects (amended SOA condition #3) and for a permanent dust control area of 4.2 acres (amended SOA condition #4). Parks submitted their initial proposal for these seasonal and permanent dust control projects on December 31, 2019. The amended SOA required the Scientific Advisory Group to review the proposed seasonal dust control project within 10 business days of receipt, and to also review any deviation in the proposed permanent dust control from the SOA-designated location adjacent to Pavilion Hill (condition #4).

SAG Evaluation: 40-Acre Seasonal Dust Control

The SAG approves of the proposed 40-acre seasonal dust control project, subdivided between two 20-acre areas.

The SAG requests that Parks provide a progress update on the seasonal dust control as an element of an abbreviated Interim Report and Work Plan (IRWP), to be submitted by March 31, 2020. This update should include an evaluation of the dust emissions reduction effectiveness of the seasonal dust control, as determined through application of an up-to-date version of the Desert Research Institute (DRI) dust emissions model. The SAG will further detail its expectations for the March 2020 abbreviated IRWP in its forthcoming response to the fourth draft Annual Report and Work Plan (ARWP).

SAG Evaluation: 4.2-Acre Permanent Dust Control

The SAG conditionally approves of the proposed 4.2-acre permanent dust control project, to be located in the southeastern portion of the La Grande tract. The SAG believes the proposed location for the 4.2-acre permanent dust control will produce a significant reduction in dust emissions. However, the SAG is also concerned that the magnitude of potential dust emissions reduction is significantly smaller than would have been realized at the location adjacent to Pavilion Hill designated in the amended SOA.

The SAG understands that Parks faced practical limitations in its choice of location for the permanent dust control. Despite these limitations, the SAG feels that Parks did not provide adequate justification for its chosen location for the 4.2-acre permanent dust control, given

alternative locations with greater dust emissions potential which we believe would have also been viable.

The SAG provides its approval for the proposed 4.2-acre permanent dust control with the following conditions:

- (1) Parks provides a justification for its choice of location for the permanent dust control. Alternatively, Parks relocates the 4.2-acre permanent dust control to a location expected to achieve a greater dust control effectiveness.
- (2) Parks applies an up-to-date version of the DRI dust emissions model to evaluate the dust emissions reduction effectiveness of the proposed 4.2-acre permanent dust control.
- (3) In its March 2020 abbreviated IRWP, Parks provides a progress update on the 4.2-acre permanent dust control, including results from the DRI model evaluation of dust control effectiveness. If the DRI model shows that the magnitude of dust emissions reduction is substantially lower than would have been achieved in the location designated in the amended SOA, then Parks should also propose a remedy to bridge the gap toward achieving the desired total dust control effectiveness.

If Parks chooses now to relocate the 4.2-acre permanent dust control, and/or if Parks chooses later to expand the permanent dust control to achieve the desired dust control effectiveness, SAG recommends that Parks consider locating the control plot in a place where OHV riders currently experience safety hazards, such as short sight distance collisions or razorback falls. By locating a control plot in such a location, Parks could achieve the added benefit of improving rider safety.

As the composition of species used for each of the treatments could be an important factor in successful establishment, effort should be made to incorporate proportional amounts of the most competent species in each treatment, both as seeds and as container plants.

The SAG appreciates the hard work and cooperative spirit that Parks has displayed in its dust emissions reduction efforts in recent months. We look forward to successful completion of the seasonal and permanent dust control projects, alongside other continuing dust control efforts at Oceano Dunes.

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