

**09-17-2019**

**Memo: SAG Comments on the 2019 Annual Report and Work Plan Second Draft**

**From: The SAG**

**To: Dan Canfield, California Department of Parks and Recreation**

**Gary Willey, APCO, San Luis Obispo County Air Pollution Control District**

**CC: CARB**

This memo provides a cursory review (due to time constraints) of the 2019 Annual Report and Work Plan (ARWP) Second Draft prepared by the California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation Division (OHMVR Division).

In general, Parks has responded to each of our specific concerns presented in our Memo of 08-16-2019, in the updated ARWP. There are a number of issues we bring to your attention in the Second Draft that are provided below.

**Specific Comments**

Statement of progress and descriptions of additional activities (see SAG's "Overview Comments" #1 and #3 from August) are now adequately addressed.

In Table 3-1, "Air quality and/or meteorological equipment" is shown as "Not Proposed". Yet, in Table 5-1 (p. 5-1), "Air quality and/or meteorological equipment" is shown being completed in September 2019. Table 3-1 appears to need correction in this regard.

In "Wind Climatology Analysis", OHMVR anticipates finalizing a contract for wind climatology analysis in October 2020. This is likely a typographic error and the correct date should be October 2019. If not, Parks must explain this contracting situation as it would severely impact the timely development of information that is required for re-evaluating the Base Line conditions for evaluating progress in air quality conditions.

Regarding the PMRP evaluation metrics and proposed implementation schedule (see "Specific Comments #3 and #4 from August), Parks addresses these, in part, but appears to delay this to next year. In Sec. 3.1 Parks state "The evaluation metrics listed in this chapter are based on the 19 Outcome Metrics and 45 Implementation Metrics contained Draft PMRP Attachment 8. The Draft PMRP identifies that specific targets should be established for each implementation and outcome metrics. The OHMVR Division will coordinate with the SAG and the SLOAPCD on the development of these specific targets over the coming year." SAG finds that Parks has not been adequately proactive on tracking progress of the Outcome Metrics and Implementation Metrics, which creates some uncertainty in deciding upon approval of the updated ARWP. This is likely, in part, due to the as-yet-to-be filled position, as well as other organizational issues.

Page 3-1 and Section 3.1.9. (Updated Topographic Database / Dataset for Topographic and Sediment Budget Monitoring), this should also appear as a distinct action item in Table 3-6 re: fore dune restoration. Extensive details and evaluation metrics were provided to Parks (Mr. Ronnie Glick) (08-28-2019), in response to a request received on 08-23-2019, some of the information provided was incorporated into the ARWP Draft 2.

Related to this, repeat UAS topographic surveys (not just a baseline survey) should be included as a distinct monitoring activity (similar to those listed for the “baseline” dust modelling conditions in Table 3-7) from which key metrics for success of the fore dune restoration can be assessed using SAG recommended methods and metrics as described in the e-mail message to Parks (Mr. R. Glick) on 08-28-2019.

Section 3.1.9 should include some reference to the utility of the SODAR for atmospheric boundary layer profile behavior and upper wind conditions for the dust modelling and dynamical downscaling, as appropriate.

Contracting issues remain unresolved, particularly those with California Polytechnic State University, San Luis Obispo, CA, and Arizona State University, Phoenix, AZ.

### **Critical Component of the ARWP Draft 2 to be Addressed**

The component of the ARWP Draft 2 that remains critically deficient, in our opinion, is the 23 acre fore dune project. SAG’s objections and scientific rationale why the 23 acre project was insufficient were presented in the Memo of 08-16-2019. SAG remains deeply concerned with this part of the ARWP Draft 2 and we specifically requested Parks explain why it disagreed with the SAG recommendation for a 48-acre fore dune project. The expected explanation is absent from the Second Draft, and this issue represents a major challenge to the approval of the ARWP. SAG reiterates our concerns:

SAG’s previous comments, summarized in our Response to AWRP Document (08-16-2019), still stand and can be seen at: (<https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/SAG%20response%20to%20revised%20PMRP.pdf>).

In addition, SAG notes that Parks has modified the “purple polygon”, as shown in Appendix 9, reducing the size to 21.9 acres by allowing for transportation corridors, and does not factor in SAG’s recommended extent or location recommendations or address future expansions per the prescribed adaptive management approach to aid in achieving the SOA air quality objectives.