



DEPARTMENT OF PARKS AND RECREATION
Off-Highway Motor Vehicle Recreation Commission
1725 23rd Street, Suite 200
Sacramento, California 95816
(916) 324-5801 • Fax (916) 324-0271

Lisa Ann L. Mangat, *Director*

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August 6, 2020

San Luis Obispo County
Air Pollution Control District
3433 Roberto Court
San Luis Obispo, CA 93401

Re: Oceano Dunes Stipulated Order of Abatement

Dear San Luis Obispo Air Pollution Control District Board,

The Off-Highway Motor Vehicle Recreation (OHMVR) Commission has advisory capacity over the Oceano Dunes State Vehicular Recreation Area (SVRA). We are monitoring the Stipulated Order of Abatement (SOA) closely with earnestness and seriousness. The Commission holds air quality as a top priority and compliance with the SOA. The Oceano Dunes SVRA has spent \$16M over nine years on monitoring, funding the Scientific Advisory Group (SAG) and the various proposed mitigations.

At our January 24, 2020 meeting representatives from the SAG provided a very thorough report. It has become clear that the latest dust mitigation effort that removed 48 acres from the riding and camping area at Oceano Dunes SVRA is out of step with the process outlined in the May 18, 2018 Stipulated Order of Abatement conditions 2.b and 2.c. (The amended November 2019 SOA does not supersede the original May 2018 document.) The SOA clearly requires any proposed mitigations be modeled prior to implementation. The SOA also requires that in order to effectively analyze any modeled mitigations that an approved baseline must be established. We were presented the draft baseline recommendations today during the August 6 2020 Commission meeting and the baseline delta has yet to be confirmed.

In addition, the SAG has admitted that they have not determined the delta difference between the natural occurring saltation process and the inferred impact from off-highway vehicle (OHV) use. At this point, it is a suggested theoretical impact that OHV recreation leads to more saltation generated dust when OHV recreation occurs on the subject sand dunes. While this is a reasonable deduction, the impact has not been quantified.

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We are in receipt of the recently released Scripps Institute of Oceanography Study, which provides interesting data relative to Particulate Matter (PM) 2.5 dust. The Scripps findings appear to dramatically call into question the PM 10 constituency accepted by the San Luis Obispo Air Pollution Control District and SAG. Scripps found that 40-60% of PM 2.5 contains inert calcium carbonate, sea salt sodium chloride, and various organic carbons among other natural occurring elements. These preliminary findings challenge the assumption that the PM 10 dust composition is all mineral dust.

It is our fiduciary responsibility to ensure that the OHV Trust Fund expenditures are spent for OHV related impacts. While we expect to use these monies for monitoring, expert research, and mitigations, it appears that in the rush to seek dust mitigation the proverbial cart is before the horse.

Respectfully yours,



Patricia Ureña, Vice Chair
OHMVR Commission