



DEPARTMENT OF PARKS AND RECREATION
Off-Highway Motor Vehicle Recreation Division
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OFF-HIGHWAY MOTOR VEHICLE RECREATION COMMISSION Pomona, CA

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STAFF REPORT: Oceano Dunes SVRA Air Quality Update
STAFF: Jon O'Brien, Environmental Program Manager
SUBJECT: 2023 Annual Report and Work Plan

Summary

In April of 2018, State Parks entered into an agreement with the San Luis Obispo County Air Pollution Control District (APCD) to address elevated levels of particulate matter 10 (PM10; particulate matter with a diameter of 10 microns or less) downwind of the Oceano Dunes State Vehicular Recreation Area. That document, a Stipulated Order of Abatement (SOA), was amended in November of 2019 and again in October of 2022. The objectives of the SOA as amended are to:

1. Eliminate emissions in excess of naturally occurring emissions...that contribute to downwind violations of the state and federal PM10 air quality standards.
2. Reduce mass-based PM10 emissions...to a level consistent with the pre-disturbance scenario identified by the SAG (SOA established Scientific Advisory Group).

Compliance with the SOA is determined in part by an air quality model developed by the Desert Research Institute (DRI). In 2022, the SAG developed an initial modeled pre-disturbance scenario meant to represent the emissivity of the dunes prior to substantial vehicular activity. The model also estimates current dust control emissions based on emissivity data collected by DRI from the dunes.

State Parks has developed an Annual Report and Work Plan (ARWP) regarding the Oceano air quality program every year since the inception of the SOA. The ARWP reports on the accomplishments from the previous year, and lays out a plan for the upcoming year in terms of PM10 mitigation projects, monitoring, and other aspects of the program.

On August 1st, State Parks submitted a first draft of the ARWP. Both the APCD and SAG expressed concerns regarding the modeling assumptions used in the first draft to compare the pre-disturbance scenario with the current dust mitigation scenario. On September 11th, 2023, Parks submitted a second draft of the 2023 ARWP which addressed the comments from the APCD and the SAG and updated the air quality

modeling assumptions. Specifically, State Parks requested that DRI update the model using the same emissivity grids for both the pre-disturbance and current scenarios to create an 'apples to apples' comparison.

The results showed substantial variability depending on the emissivity grid used for the comparison. The apples-to-apples comparison will be updated during the 2023 ARWP cycle to resolve the differences in emissivity between years.

Another component of the 2023 ARWP is to define the 'excess emissions' framework as per condition 2(b) of the amended SOA. A primary focus of the upcoming year will be to work with the SAG and the APCD to define this target.

Given the variability in the current 'apples to apples' comparisons, and that the SOA targets will fundamentally change as the excess emissions framework is defined, State Parks does not propose to do any new PM10 mitigation projects in the second draft of the 2023 ARWP. Parks will convert 37.5 acres of wind fencing and straw treatments to native dune vegetation.

The 2023 ARWP is currently under review by the SAG and APCD and a final version of the document is due to the APCD by October 1st. State Parks will present the plan to the APCD Hearing Board on Friday, October 13th.

Commission Action

For information only.

Attachments

None