



**DEPARTMENT OF PARKS AND RECREATION**

Off-Highway Motor Vehicle Recreation Division  
PO Box 942896  
Sacramento, California 94296  
Telephone: (916) 902-8598

**Armando Quintero, *Director***

**OHMVR COMMISSION MEETING  
Sacramento, CA**

**February 17, 2022**

**STAFF REPORT:** San Luis Obispo County Air Pollution Control District Hearing Board Meeting and a Potential Stipulated Order of Abatement Revision

**STAFF:** Jon O'Brien, Environmental Program Manager

**SUBJECT:** Scientific Advisory Group Recommendation, Scientific Basis for Possible Revision of the Stipulated Order of Abatement (SOA)

---

**Summary**

The California Department of Parks and Recreation (Parks) entered into a Stipulated Order of Abatement (SOA) with the San Luis Obispo County Air Pollution Control District (APCD) in 2018 to address high particulate matter, or dust, levels in and downwind of Oceano Dunes State Vehicular Recreation Area (ODSVRA). The SOA identifies three air quality requirements:

1. To achieve the federal ambient PM10 air quality standard
2. To achieve the state ambient PM10 air quality standard
3. To reduce the maximum 24-hour PM10 baseline emissions by 50%

Pursuant to Section 2d of the SOA, Parks has been working with the Scientific Advisory Group (SAG) to evaluate the initial 50% mass emission reduction (Section 2c) target to determine if this reduction should be modified based on "air quality modeling conducted by CARB or other modeling subject to the review of the SAG required..." (Section 2d)

As part of this effort, the SAG with Parks requested that the Desert Research Institute (DRI) create a model scenario that represents the Park and dust emissions before significant OHV activity. Essentially, this included using the dust emissivity of the non-riding areas to represent pre-OHV emissivity within the riding area; and using historic vegetation cover (from 1939, the earliest known complete aerial images of the dune) to represent the extent of vegetation in the Park prior to intensive OHV impacts.

Based on this work and assuming a management goal of reversing the effects of OHV, the SAG recommends reducing the 50% mass emissions requirement to 40.7%. Parks has currently reduced mass emissions by 28%, as per the 2021 Annual Report and Work Plan (ARWP). Parks plans to have installed 412.5 acres of dust mitigation projects by July 31, 2022. The SAG also recommends refinements to dust emissions modeling that could affect estimates of needed dust mitigation acreage for SOA compliance.

The SAG also notes that, for treatments installed by July 31, 2022, the modeled particulate matter concentrations at the air quality monitoring stations downwind of ODSVRA (both CDF and Mesa2) are anticipated to be below what the concentrations would have been under this pre-OHV scenario; and that 'elimination of all California PM10 air quality exceedances would likely require a reduction in PM10 emissions far below what existed in the 1939 pre-disturbance scenario...'

The SAG recommends extending monitoring of SOA treatments past the December 2023 timeline to account for ongoing dune development and to enable adaptive management.

The San Luis Obispo County Air Pollution Control District Hearing Board will be meeting on March 23<sup>rd</sup>, 2022, to revisit the Stipulated Order of Abatement, and the associated air quality requirements. Parks is required to submit materials related to this meeting by February 22, 2022.

### **Commission Action**

For review and comment.

### **Attachments**

Scientific Basis for Possible Revision of the Stipulated Order of Abatement (SOA) by the Scientific Advisory Group