



Air Pollution Control District
San Luis Obispo County

May 22, 2012

Phil Jenkins
Acting Deputy Director
California State Parks, OHMVR Division
340 James Way, Suite 270
Pismo Beach, CA 93449

SUBJECT: Revised Oceano Dunes Monitoring Site Selection Plan

Dear Mr. ~~Mr.~~ ^{Phil}Jenkins:

Thank you for your May 9, 2012 submittal of the revised Oceano Dunes Monitoring Site Selection Plan (MSSP). As you noted in your cover letter, significant revisions were made to this version of the document based on our comment letter and several subsequent conference calls with your staff; those substantive discussions provided greater clarity and the ability to resolve some of our initial concerns. While we still have some questions and/or concerns regarding a few specific elements of the proposed Plan, we believe the May 9, 2012 revised MSSP provides a path forward that we can approve, subject to the following exceptions and conditions:

1. Prior to beginning measurements under the MSSP, submit and obtain APCO approval of a detailed measurement plan operating procedure for all proposed measurements, including data handling and quality assurance protocols
2. As we have stated in several phone discussions, Dune Source Strength is not an applicable criteria or requirement for the MSSP; it is more appropriate for consideration during development of the Particulate Matter Reduction Plan (PMRP). Thus, the emissivity, mass PM10 concentration and particle count measurements listed in Table 3 and described in Section 4.3.1 are not part of this approval and are not part of the site selection process. You are, of course, free to perform such measurements on your own. As we have communicated in prior comments, however, we have significant reservations regarding the viability and value of these measurements given the limitations of the proposed equipment.
3. With the exception of Dune Source Strength, we agree with the criteria listed in Table 3, *Preliminary Characteristics to Consider when Comparing CDVAA and Control Monitor Sites*.
4. As previously stated, we disagree with much of the discussion in section 7.2 regarding open sand and vegetation coverage comparisons; it is also inconsistent with Table 3. Thus, we will rely on the criteria listed in Table 3 for determining the appropriate open sand and vegetation coverage comparisons between CDVAA and control source areas.

5. Finally, Section 7.3 incorrectly lists the S1 tower as being located in the foredunes. There are no true foredunes remaining in this area of the SVRA due to impacts from vehicle activity. If foredunes were actually present there, the S1 location relative to the coastline would place the tower at the very rear of any foredunes, at best.

With the conditions and exceptions listed above, the May 9, 2012 MSSP is approved for implementation. Please note that Rule 1001 requires Air Pollution Control Officer (APCO) approval of the final monitoring site locations. Thus, State Parks should not proceed with installing any monitoring equipment required under Rule 1001 prior to obtaining APCO approval for the site location and measurement methods.

We appreciate the substantial effort and resources you have put into developing the MSSP and look forward to working with you and your staff on this important project and the others to follow. Please call me at (805) 781-5912 if you have any questions or concerns regarding this approval or any other aspect of Rule 1001 implementation.

Sincerely,



Larry R. Allen
Air Pollution Control Officer

cc: John Hamon, APCD Board Chair