



DEPARTMENT OF PARKS AND RECREATION

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OFF-HIGHWAY MOTOR VEHICLE RECREATION COMMISSION MEETING

Tracy, CA

October 24, 2024

STAFF REPORT: Oceano Dunes State Vehicle Recreation Area Air Quality Program¹
Update

STAFF: Jon O'Brien, Environmental Program Manager

SUBJECT: Stipulated Order of Abatement, Case No. 17-01

Summary

The California Department of Parks and Recreation (State Parks) entered into a Stipulated Order of Abatement (SOA; Case No. 17-01) with the San Luis Obispo County Air Pollution Control District (APCD) in May 2018², related to Oceano Dunes State Vehicle Recreation Area (ODSVRA). That agreement was amended in 2019³ and again in 2022⁴. The air quality target of the SOA is to 'eliminate emissions in excess of naturally occurring emissions from the ODSVRA that contribute to downwind violations of the state and federal PM10 air quality standards.'

State Parks worked with the Scientific Advisory Group (SAG) and the APCD to develop a framework to define 'excess emissions'⁵. That framework compares the emissions from a 'pre-disturbance' scenario with the current emissions scenario. The pre-disturbance scenario is based on the emissions from the non-riding area whereas the current scenario is based on the emissions from the riding area. The initial results indicate that at this time the emissions coming from ODSVRA are not in excess of naturally occurring emissions⁶. The target is based on the total emissions coming from the dunes which is determined from a complex air quality model developed by the Desert Research Institute (DRI) and approved by the SAG.

The model will continue to be refined, including incorporating the results from the 2024 ODSVRA-wide emissivity measurement campaign that will influence both the pre-disturbance and current emissions results. There is additional work, including expanding the modeling domain to include all of ODSVRA, that will further inform the modeling results.

Given these ongoing refinements to the model, the APCD and State Parks mutually agreed to extend the SOA until December of 2028⁷. The SOA will transition to a maintenance and adaptive management plan. The extension will allow time for State Parks to demonstrate continued and sustained compliance with the SOA as new data is entered into the model;

that the emissions coming off ODSVRA are not in excess of naturally occurring emissions. In addition, it will allow time for the current PM10 mitigation projects to mature and for there to be further improvements in measured downwind air quality, thereby giving the APCD Hearing Board⁸ confidence in the modeling results and that State Parks is compliance with the SOA.

On October 15, 2024, the APCD Hearing Board met⁹ and adopted the amended SOA. The Hearing Board also directed the APCD to develop a new air quality metric based on PM10 concentrations that may be added as an air quality target to a future amendment of the SOA. The Hearing Board scheduled an additional meeting for June 25, 2025 regarding the requested concentration metric.

Commission Action

For information only.

Attachments

1. Oceano Dunes air quality program overview: <https://www.slocleanair.org/air-quality/oceano-dunes-efforts.php>
2. Original Stipulated Order of Abatement: <https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Filed%20%26%20Approved%20SOA%20Case%2017-01%20Apr-30-18.pdf>
3. 2019 amendment of Stipulated Order of Abatement: https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/AMENDED%20Order%20of%20Abatement%2011-18-19_FILED_12.pdf
4. 2022 amendment of Stipulated Order of Abatement: <https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/SOA%2017-01%20Second%20Amendment%20Final%20Adopted%2010-14-2022%20%26%20Filed.pdf>
5. Excess Emissions Framework: https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/SAG%20Memo_Emissivity%20Grids%20for%20Future%20Modeling%20of%20Excess%20Emissions%20-%2020231219.pdf
6. Excess Emissions modeling results: https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Modeling%20to%20Determine%20the%20Condition%20of%20Excess%20Emissions%20for%202023%20ODSVRA%2003_14_2024.pdf
7. 2024 amendment of Stipulated Order of Abatement: <https://storage.googleapis.com/slocleanair->

[org/images/cms/upload/files/Proposed%20Modification%20to%20Stipulated%20Order%20of%20Abatement%2017-01.pdf](https://www.slocleanair.org/images/cms/upload/files/Proposed%20Modification%20to%20Stipulated%20Order%20of%20Abatement%2017-01.pdf)

8. APCD Hearing Board and SOA amendment related materials:
<https://www.slocleanair.org/who/board/hearing-board.php>
9. October 15, 2024 APCD Hearing Board meeting:
<https://www.slocleanair.org/who/board/meeting-minutes.php.php>