

***DRAFT***

July 17, 2023

Honorable Steven S. Cliff, PhD., Executive Officer  
California Air Resources Control Board  
1001 I Street  
Sacramento, CA 95814

RE: Oceano Dunes State Vehicle Recreation Area – Components and Regulation of PM10

Dear Executive Officer Cliff:

The California Off-Highway Motor Vehicle Recreation Commission (Commission) met on July 27-28, 2023, and approved this letter regarding the Oceano Dunes State Vehicle Recreation Area (ODSVRA) and the components and regulation of PM10. The Commission understands the importance of healthy air quality and compliance with laws and regulations to protect the public's health. However, the Commission continues to confront public confusion and mistrust during public meetings throughout the year and would benefit from your agency's participation to help inform our understanding as State Parks continues to move forward and meet the obligations of ODSVRA annual Particulate Matter Reduction work plans.

In September 2017 the California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division (OHMVR Division) entered a Stipulated Order of Abatement (SOA) and has been working closely with the San Luis Obispo County Air Pollution Control District (APCD) to mitigate and adaptively manage particulate matter emissions from the ODSVRA. The parties to the original SOA agreed on the need for a comprehensive planning effort to affect a global solution to particulate matter emissions that addresses all the various interests, including: the surrounding and downwind communities, the ODSVRA user base, and the various regulatory and permitting agencies, as well as State Parks mission to operate the ODSVRA for a variety of recreational uses, including off-highway motor vehicle recreation. The original SOA also recognized that PM10 concentrations measured at CDF-Arroyo Grande and on the Nipomo Mesa, may be impacted by other natural and manmade sources of particulate emissions external to ODSVRA. Therefore, all three agencies involved, APCD, CARB and the OHMVR Division, committed to undertake several academic investigations since implementing the Particulate Matter Reduction Plan (PMRP). It is the Commission's understanding that in order for air pollution to be properly and

equitably regulated, the regulator must identify the chemical components to determine the proportional responsibility of the regulated entities to mitigate their impacts. Currently the ODSVRA is assuming 100% of this responsibility while new data analysis identifying the sources PM10 emissions are under way.

We respectfully request that your agency attend the next OHMVR commission meeting scheduled on September 28-29, 2023, to help inform our Commission, members of the public, and interested parties about the regulation of PM10 and its components as it relates to the ODSVRA. Please confirm your attendance or respond by September 1, 2023.

Sincerely,

Patricia Urena, Chair  
Off-Highway Motor Vehicle Recreation Commission

Cc: Ms. Edie Chang, Deputy Executive Officer – Planning, Freight, and Toxics,  
CA Air Resources Control Board

Mr. Gary Willey, Air Pollution Control Officer, San Luis Air Pollution  
Control District

Mr. Armando Quintero, Director, CA Department of Parks and Recreation  
Off-Highway Motor Vehicle Recreation Commission  
Scientific Advisory Group