



DEPARTMENT OF PARKS AND RECREATION

Off-Highway Motor Vehicle Recreation Division

P.O. Box 942896

Sacramento, California 94296

Telephone: (916) 324-4442

Armando Quintero, *Director*

OFF-HIGHWAY MOTOR VEHICLE RECREATION COMMISSION
Hesperia, CA

February 1, 2024

STAFF REPORT: Oceano Dunes State Vehicular Recreation Area Air Quality Update
STAFF: Jon O'Brien, Environmental Program Manager
SUBJECT: Stipulated Order of Abatement 17-01 Excess Emissions Framework

Summary

As per the October 18, 2022 amendment of the Stipulated Order of Abatement (SOA; Case No. 17-01), the air quality target of the SOA was updated to 'eliminate emissions in excess of naturally occurring emissions from ODSVRA [Oceano Dunes State Vehicular Recreation Area] that contribute to downwind violations of the state and federal PM10 [particulate matter with a diameter of 10 microns or less] air quality standards.' This emissions target must be approved by the San Luis Obispo County Air Pollution Control District (APCD) Hearing Board by October 16, 2024.

As per the October 18, 2023 Final Conditional Approval Letter for the ODSVRA Air Quality 2023 Annual Report and Work Plan (ARWP), 'State Parks shall work with the SAG [Scientific Advisory Group] to finalize the SAG-recommended emissivity grid to be used for determining compliance with the SOA emissions reduction goal.'

On December 19, 2023, the SAG submitted an emissivity grid framework recommendation to the Department of Parks and Recreation (State Parks) and the APCD to be used in determining compliance with the SOA. That proposed emissivity grid includes a new emissivity zonation of ODSVRA. It also proposes to use all of the emissivity data from 2013 to 2022 to characterize the emissions coming from the dunes, as opposed to using a single year's emissivity data. There are also statistical differences that will be used to interpret the data.

Compliance with the SOA will still be determined comparing the current mass-emissions values with the pre-disturbance mass emissions values. As before, the current mass-emissions values will be based upon actual emissivity measurements (using a Portable In-situ Wind Erosion Lab; PI-SWERL) within the different zones of the riding area, along with the current vegetation coverage. The pre-disturbance scenario will be based on the emissivity

data from the non-riding area overlaid on the riding area, along with the vegetation coverage from 1939.

Final compliance with the SOA will therefore be based on a modeled mass-emission target.

State Parks submitted a letter to the APCD concurring with the SAG-recommended approach on January 16, 2024. The APCD has final emissions assumption approval authority and must approve the recommendation by February 14, 2024.

State Parks plans to work with the SAG and the Desert Research Institute (DRI) to initiate the modeling framework. Results from the framework must be completed by March 15, 2024.

The SAG-recommended modeling framework will determine whether State Parks is in compliance with the amended SOA, or whether State Parks is out of compliance with the amended SOA, and additional PM10 mitigation projects will be required.

Commission Action

For information only.

Attachments

SAG Modeling Recommendation: https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/SAG%20Memo_Emissivity%20Grids%20for%20Future%20Modeling%20of%20Excess%20Emissions%20-%2020231219.pdf

Amended Stipulated Order of Abatement (October 18, 2022):
<https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/SOA%2017-01%20Second%20Amendment%20Final%20Adopted%2010-14-2022%20%26%20Filed.pdf>

Other documents related to the ODSVRA air quality program:
<https://www.slocleanair.org/air-quality/oceano-dunes-efforts.php>