



Air Pollution Control District
San Luis Obispo County

July 10, 2013

Mr. Phil Jenkins, Chief
OHMVR Division
CA Department of Parks & Recreation
1725 23rd St., Ste. 200
Sacramento, CA 95816

SUBJECT: Conditional Approval of the Oceano Dunes State Recreational Vehicle Area (ODSVRA) Particulate Matter Reduction Plan (PMRP), March 29, 2013 Version

Dear Mr. Jenkins:

Thank you for submitting the ODSVRA Particulate Matter Reduction Plan (PMRP), Third Draft, dated March 29, 2013. APCD staff have reviewed the document and still have concerns regarding some elements of the proposed Plan, as outlined in Attachment 1. Chief among those concerns is the lengthy timeframes proposed before any control measure implementation begins due to State Parks' desire to conduct a comprehensive monitoring program prior to deciding where and what controls will be installed. We believe earlier control measure implementation is essential to enhance the overall effectiveness of the controls and achieve timely reduction of emissions and downwind particulate levels. Thus, Attachment 2 provides a discussion developed by Dr. Chatten Cowherd, of the Midwest Research Institute, describing the typical process used to evaluate and decide on the type, scope and location of appropriate control measures for reducing sand transport and particulate emissions. We hope you will find this helpful.

We believe the concerns raised in Attachment 1 can and should be addressed and resolved as the Coastal Commission permitting process unfolds. In particular, we recommend State Parks seek the input of key oversight agencies and other stakeholders on measures that can reduce sand movement in near shore areas, such as re-establishment of vegetated foredunes in the areas where they have been destroyed by vehicle activity. State Parks own studies show such measures are essential to reduce the energy of the strong onshore winds that impede successful establishment of vegetation further inland to reduce sand transport. Providing upwind surface roughness was also shown in the pilot projects to reduce sand movement and thus reduce the potential for downwind particulate emissions. Based on those studies, we believe implementing near-shore controls could significantly reduce the amount of acreage that may otherwise be needed for control measure installations further inland to achieve the same level of effectiveness.

Nonetheless, the PMRP is State Parks' Plan for complying with Rule 1001, not APCD's. You have the latitude under the Rule to implement the control measure approach you believe will most effectively meet the requirements of the Rule. Ultimately, however, you are

responsible for meeting the performance standard in Section C.3 of the rule when it becomes effective on May 31, 2015. If implementation of the PMRP fails to meet that standard, it will further jeopardize the health and welfare of all downwind residents and the ability of APCD to meet state and federal mandates to attain the health-based air quality standards for particulate matter. Thus, the importance of the PMRP control strategies effectively reducing particulate emissions from the dunes in a timely manner cannot be overstated.

With that said, we conditionally approve the March 29, 2013 version of the ODSVRA Rule 1001Draft PMRP subject to the following exceptions and conditions:

1. Comply with the conditionally approved Monitoring Site Selection Plan.
2. Obtain Air Pollution Control Officer (APCO) approval of the PM₁₀ monitoring network required by Rule 1001.C.2.a
3. Install and begin operation of the PM10 monitoring network by July 31, 2014.

Please note that Rule 1001 requires Air Pollution Control Officer 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 such approval for the site location and measurement methods.

Please call me at (805) 781-5912 if you have any questions or concerns regarding this conditional approval of the PMRP or any other aspect of Rule 1001 implementation.

Sincerely,



Larry R. Allen
Air Pollution Control Officer

cc: Board of Directors, San Luis Obispo County Air Pollution Control District
General Anthony Jackson, California Department of Parks & Recreation
Chris Conlin, California Department of Parks & Recreation, OHMVR Division
Dan Carl, California Coastal Commission
Richard Corey, California Air Resources Board
Deborah Jordan, U.S. EPA Region 9