



OFF-HIGHWAY MOTOR VEHICLE RECREATION COMMISSION

COMMISSION MEMBERS

Patricia Urefia, *Chair*  
Roger Salazar, *Vice Chair*  
Shaun Flanigan  
Tom Lemmon  
Nicholas Mueller  
Edward Patrovsky  
Tommy Randle  
Diane Ross-Leech

August 4, 2023

The 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, 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 the ODSVRA Particulate Matter Reduction Program Annual Work Plan.

In 2018, the California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division (OHMVR Division) entered into 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. All three agencies involved, APCD, CARB and the OHMVR Division, in the original SOA agreed on the need for a comprehensive planning effort and academic investigations to effect a global solution to particulate matter emissions that addresses all the various interests, including: the surrounding and downwind communities, the ODSVRA user base, 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 the ODSVRA.

The Honorable Steven S. Cliff

Page Two of Two

August 4, 2023

The Commission believes the ODSVRA and the OHMVR Division have made significant progress to achieve the identified target air quality objectives. Recently completed studies from the Scientific Advisory Group (SAG), the Desert Research Institute (DRI) and the Scripps Institute of Oceanography (Scripps) provide more information about the responsibility for all users and impacts on PM10 air pollutants on the Nipomo Mesa. In its 2022 report, the SAG suggested revising the SOA reduction target of PM10 mass emissions from 50% to 40.7%. The Scripps February 2023 report found that conservatively, no more than 14% of the total PM10 emissions detected from downwind monitoring stations could have come from mineral dust, which could be argued comes from the ODSVRA. Both the SAG/DRI and Scripps studies found that dust was less than 50% on average, and that sea spray contributed to high PM10.

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 of PM10 emissions are continuing.

The ODSVRA and OHMVR Division have worked diligently with the SAG, DRI and Scripps to complete exhaustive analyses and to implement a variety of successful dust mitigations. It is also apparent that the scientific community agrees that the PM10 exceedances are not caused solely by OHV and associated camping and recreational uses. The Commission and the interested public deserve your agency's expertise, education and interpretation of airborne particulate matter.

We respectfully request that you or your representative 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. Wade Crowfoot, Secretary, California Department of Natural Resources

Mr. Armando Quintero, Director, CA Department of Parks and Recreation

Off-Highway Motor Vehicle Recreation Commission

Scientific Advisory Group