



# Air Resources Board

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**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chair**  
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**Edmund G. Brown Jr.**  
Governor

August 4, 2017

Mr. Kevin Kahn  
District Supervisor  
Central Coast District Office  
California Coastal Commission  
725 Front Street, Suite 300  
Santa Cruz, California 95060

Dear Mr. Kahn:

Thank you for the opportunity to comment on the Coastal Development Permit application submitted by the California Department of Parks and Recreation (State Parks) outlining the five-year plan for dust mitigation activities at the Oceano Dunes State Vehicular Recreation Area (Oceano Dunes SVRA). The California Air Resources Board (CARB) has been working closely with State Parks and the San Luis Obispo Air Pollution Control District (District) on this critical effort to protect public health. In our role as the State's lead air quality agency, CARB has been facilitating discussions between State Parks and the District, as well as providing technical expertise and support.

As part of that effort, CARB has developed an air quality modeling system that provides a robust scientific foundation for informing needed mitigation efforts. The air quality model simulates emissions and wind conditions in the Oceano Dunes SVRA to estimate air quality impacts within the surrounding communities. CARB staff completed the development of this model earlier this year and presented initial results to the District's Governing Board in June.

Action by California Coastal Commission on the five-year plan submitted by State Parks is an important step in ensuring significant mitigation action can take place next spring to protect downwind residents from dust coming from the dunes. We are now working with State Parks and the District to do a science-based evaluation of the locations and extent of mitigation that will be necessary to fully address air quality impacts downwind of the Oceano Dunes SVRA. This is part of the effort to design next spring's mitigation focusing on those areas that the air quality modeling indicates are important locations

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California Environmental Protection Agency

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for mitigation and meeting the requirements of the District's Rule 1001. Therefore, Coastal Commission action on the permit application will allow State Parks to implement dust mitigation next spring that is designed to be consistent with what will be necessary to ensure healthful air downwind.

Still, the five-year plan was developed without the benefit of the further scientific insights provided by the air quality model. Therefore, in addition to using the model to design next year's mitigation, CARB will work with State Parks and the District to apply the model to develop a comprehensive plan for meeting District Rule 1001 and the multiple recreational uses and environmental objectives of the Oceano Dunes SVRA. Because of the profound health impacts of dust pollution, CARB believes a broader plan must be developed in parallel with next year's mitigation under the five-year plan and be completed well within the timeframe of the five-year plan. CARB is committed to working with State Parks and the District to make this happen.

We look forward to continuing to work with the Coastal Commission on effective solutions and ensuring mitigation is put in place as quickly as possible. If you have any questions or would like additional information, please contact me at (916) 445-5610 or via email at [kurt.karperos@arb.ca.gov](mailto:kurt.karperos@arb.ca.gov).

Sincerely,



Kurt Karperos  
Deputy Executive Officer

cc: Larry Allen  
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