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August 19, 2026

By Email:

Chair Diane Ross-Leech
OHMVR Commissioners
PO Box 942896 Sacramento, CA 94296-001

RE: PM10 Pre-Disturbance model baseline assumption that the ocean's contribution is the same today as in the 1930s.

Friends of Oceano Dunes ("Friends"), a California not-for-profit corporation, representing members and users of the Oceano Dunes State Vehicle Recreation Area ("SVRA"), hereby submits these comments and request for State Parks to present information outlined below.

At the 8/6/26 OHV Commission meeting, the SAG presented a report that discussed the model used at the Oceano Dunes to compare the "Pre Disturbance" to today. The "Pre-Disturbance" is defined as the 1930s due to the available historical pictures.

I presented during my brief three-minute time our concerns that the "Pre Disturbance" assumption that the ocean is the same today as the 1930s is in error and mentioned several reasons why. **This letter is to document our concerns and request a detailed response explaining why the following known differences are being ignored in the model and request the model to be updated to better reflect reality.**

Friends of Oceano Dunes is a 501(c)(3) California not-for-profit corporation. Friends represents environmentalists, equestrians, campers, fishermen, families and off-road enthusiasts who enjoy the benefits of public access through responsible recreation at the Oceano Dunes State Vehicular Recreation Area (ODSVRA). Friends seeks to maintain Access For All!

The following table is **NOT all inclusive** but highlights some significant differences to show that the oceans contribution of PM10 from the 1930s can not be considered the same as the contributions in the 2020s.

Contributor	1930s	2020s	Discussion
SLO Population	29,613	282,367	Roughly a 872% higher or a growth of over 9 times.
SLO Visitors	~ <1 million	7.7 million	No 1930s figures available, CHATGPT estimated 125,000 based on hotel visits.
Diablo Cooling Water Discharge	NA	2,760 MGD	Operational 1985, The Facility is authorized to discharge up to 2,760 million gallons per day of wastewater, primarily consisting of seawater used for once-through cooling of its two nuclear reactor units along with other lower-volume industrial waste streams. The seawater that cools the nuclear plant's condensers provides the feed water for desalination. The desalination brine is diluted with the remaining condenser coolant before being discharged to the ocean. Debris removed from the screens via high-pressure sprays is passed through a grinder pump and collection basin before being discharged back to the Pacific Ocean. Brine produced from SWRO system processes is discharged into the auxiliary seawater system where it is mixed and is diluted with cooling water prior to discharge at Discharge Point 001. The volume of brine produced through the SWRO system is typically less than 5 percent of the total volume of seawater discharged per day.
Refinery Outfall	NA	.5 MGD	Constructed in 1955 to 2023. The outfall discharged .5 MGD into the ocean.
Oceano Outfall	NA	2.5 MGD	Outfall constructed in 1963. The District's current Wastewater Treatment Plant (WWTP) treats approximately 2.5 million gallons per day (MGD) of wastewater from the Oceano Community Services District (Oceano CSD) and the Cities of Arroyo Grande and Grover Beach. The plant currently discharges the effluent to the ocean through a joint outfall, shared with the City of Pismo Beach Wastewater Treatment Plant (PB WWTP).
Avila	NA	.2 MGD	Outfall constructed 1969. The District's treated municipal wastewater is discharged to the Pacific Ocean through a 2,240 ft outfall. The outfall is terminated in the San Luis Bay at 35°10'25" N latitude and 120°44'01" W longitude in approximately 29 feet of water, 540 feet beyond the Avila Pier. The District's WWTP is designed for an average dry weather maximum monthly flow of 0.2 million gallons per day (MGD).

Note: MGD stands for Million Gallons per Day

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State Parks needs to correct the Pre Disturbance model to more accurately reflect the current oceans contributions of PM10. There is ample evidence to suggest that the Ocean's contribution of PM10 is greater today than in the 1930s.

Please note, all dust that lands on parking lots, rooftops, roads etc is washed down the storm drains and back into the ocean to start the process all over again. The storm drains, roads and parking lots are far more significant today than in the 1930s.

We offer our assistance and want to partner with State Parks and the OHV Commission. Friends seeks to protect [Access For All](#) while ensuring a [No Net Loss](#) management of the Oceano Dunes SVRA.

Sincerely,



Jim Suty
President – Friends of Oceano Dunes

CC: Legal Team
Friends' Board of Directors
OHV Division
OHV advocates
Public Users