

Date: March 26, 2025

From: Will Harris, Professional Geologist

To: The California Off-Highway Motor Vehicle Recreation Commission

For: OHMVR Commission meeting on April 2, 2025

Regarding: Oceano Dunes and Recently Disclosed State Parks Documents

Dear Commissioners,

Via a public records request submitted to California State Parks, I received an important cache of documents and communications regarding Oceano Dunes, the ongoing Stipulated Order of Abatement imposed by the San Luis Obispo County Air Pollution Control District, and the peer-reviewed publication of the Scripps Institution of Oceanography's investigation that found that only 14% of particulate pollution measured downwind of Oceano Dunes consists of dust.

My review of the records reveals that State Parks has undertaken a concerted effort to suppress mention of and reference to the Scripps investigation and its 14% dust findings. Additionally, State Parks failed to leverage a disclosure from an executive at the California Air Resources Board that the state's PM10 air quality standard is "aspirational and ambiguous" and that "most parts of the state are not compliant with that standard."

I have detailed my findings in an article that can be found at this link:

<https://calcoastnews.com/2025/02/state-parkss-oceano-dunes-public-records-suppress-the-science/>

It is my hope that you take the time in advance of your April 2, 2025 meeting to read about these disturbing disclosures. In the piece I also shine a light on how Oceano Dunes has suffered from Sacramento-based management of the park since 2017.

Finally, for ease of overall reference, I have prepared a one-page bulleted summary of the Oceano Dunes saga. It is attached to this letter.

Sincerely and at your service,



Will Harris

Attachment: Oceano Dunes Bulleted Summary

Oceano Dunes, the Local Air District, and California State Parks: A Summary of Fraud and Mismanagement

The local air pollution control district (APCD) is a bad actor. The San Luis Obispo County APCD has claimed particulate pollution (PM10) on the Nipomo Mesa, an area two miles inland from Oceano Dunes, is dust from dunes disturbed by off-highway vehicle (OHV) recreation.

- The APCD heightened this concern by saying the dust is [silica](#).
- The California Coastal Commission parroted the APCD claims, causing a broader hysteria and further maligning OHV recreation.
- Independent investigations found no silica in the PM10 and that [only 14%](#) of Mesa PM10 consists of dust.

Cost and lost acreage. State Parks accepted an APCD Stipulated Order of Abatement in 2018.

- State Parks accepted the Order even though the APCD lie regarding silica had been revealed and despite preliminary evidence of the 14% dust content in the PM10.
- State Parks agreed to the Order without consulting technical staff.
- A patchwork of dune-covering “mitigations” installed under the Order have closed off half of the 1,500-acre park from recreational use. In secret, State Parks executives unilaterally and needlessly sacrificed one half of the park’s prime shoreline camping capacity. Yet PM10 violations on the Nipomo Mesa [continue](#).
- As of March 2022, Order-related expenses amount to \$25.2 million. Expenditures are ongoing.
- The APCD’s Order has been revised and extended three times.

Legal apathy. In 2021, the Coastal Commission voted unanimously to remove OHV recreation from the park.

- The Coastal Commission’s action contradicted and postdated the park’s legislative authorization to operate as an OHV recreation area.
- State Parks took no legal action. A park enthusiast group, the Friends of Oceano Dunes, stepped in with a lawsuit against the Coastal Commission.
- The SLO County Superior Court ruled for Friends: The Coastal Commission exceeded its authority.
- The [California Court of Appeals agreed](#) with and strongly affirmed the lower court Ruling.
- State Parks remains on the sidelines.

State Parks disregards and suppresses the Scripps Institution of Oceanography scientific findings.

- The 14% dust findings by Scripps effectively obliterated the APCD’s rationale for its Order regarding Oceano Dunes, giving cause for State Parks to exit the Order.
- Obtained documents reveal that [State Parks chose to suppress the Scripps findings](#).
- When reminded of the Scripps work, State Parks provided lip service only, stating it “will be part of the discussion.” Revisions to the Order make no reference to the Scripps work.

Sacramento-based management of Oceano Dunes.

- The District Superintendent position at Oceano Dunes has been vacant since 2017.
- The position has been staffed by State Parks personnel in an “acting” capacity only.
- The current “acting” superintendent is based in Sacramento and visits Oceano Dunes sporadically.

“Transformation” sidelines OHV recreation. The Oceano Dunes saga reflects a broader sidelining of OHV recreation within State Parks that started in 2017, after the finalization of the department’s “Transformation” restructuring.

- Before Transformation, the OHMVR Division provided and advocated for safe, responsible OHV recreation.
- Before Transformation, the OHMVR Division directly managed the state’s nine State Vehicular Recreation Areas (SVRAs) and received allocated gasoline tax funding directly.
- After Transformation, the OHMVR Division is a shadow of its former self. Gasoline tax funding passes through State Parks headquarters before going to the Division. The OHMVR Division’s responsibility now regards only the administration of grants and general accounting.
- After Transformation, State Parks assumed direct management of the nine SVRAs.