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September 15, 2026

By Email:

Jon Obrien, Superintendent at the Oceano Dunes SVRA

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

RE: Pre-disturbance model must be updated to reflect assumptions on the Oceans contribution to PM10 downwind of the Oceano Dunes SVRA

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

The Science Advisory Group (SAG), State Parks (SP) and the Air Pollution Control District (APCD) failed to account for the differences in the ocean's contribution to PM10 downwind of the ODSVRA in the Pre-Disturbance model.

Friends has provided the following evidence in support of the need to improve the model regarding the Pre-Disturbance models assumption that the oceans contributions are the same today (2020s) as compared to the Pre-Disturbance time (1930s).

A) Friends letter dated 8/19/26 titled "PM10 Pre-Disturbance model baseline assumption that the ocean's contribution is the same today as in the 1930s." Friends letter provides evidence showing significant population and visitation differences as well as documented 2,765 Million Gallons Discharged (MGD) in the ocean in front of the ODSVRA. This discharge of known particulates (PM10) in the water in front of the

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!

ODSVRA that did NOT exist during the 1930s. This alone invalidates the assumption that the ocean's contribution is the same in the 1930s as it is in 2020.

B) Friends letter dated 3/2/26 titled "Sea Spray Aerosol (SSA) contributions to PM10 are being ignored at the Oceano Dunes SVRA." Provides scientific evidence showing that particulates in the ocean are known contributors to downwind PM10. Furthermore, this letter highlights the known background level of PM10 by looking at the high PM10 with relatively low wind speeds while being closed to OHV use due to COVID. Friends believes this reflects the "natural background level" of PM10 at the Oceano Dunes which should be excluded.

Continuing to ignore that the particulates in the ocean are far greater now than in the 1930s with scientific findings proving that particulates in the ocean contribute to downwind PM10 is a failure of the SAG, State Parks and the APCD!

To date, Friends has taken the time to write numerous letters.... with no response!

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