

Date: February 19, 2026
To: OHMVR Commission
From: Will Harris

Regarding: Lack of Permanent District Superintendent Representation at Oceano Dunes and Associated Legal Implications.

Dear Commissioners,

The San Luis Obispo County Air Pollution Control District (APCD) claimed without proof that the air above the Nipomo Mesa was filled with silica dust that came from Oceano Dunes State Vehicular Recreation Area (SVRA). They said publicly that it was carcinogenic, that it would cause “fibrotic lung disease.” Unsurprisingly, this created hysteria in the community and caused many to malign Oceano Dunes and off-highway vehicle (OHV) recreation.

I conducted the scientific work that exposed the APCD’s silica claim to be a lie. I did this for California State Parks. The evidence I presented was sufficient enough to cause the director of the APCD to publicly admit that his claim was false, that it was all “[a red herring.](#)”

But that didn’t stop the APCD. They just kept going, claiming that elevated particulate pollution detected on the Mesa is dust that came from off-highway vehicle recreation at Oceano Dunes. That too is a lie.

And again for State Parks, I proved that claim to be false. With the significant help of Dr. Lynn Russell, atmospheric chemist from the Scripps Institution of Oceanography, we revealed that just 14% of the particulate pollution detected on the Nipomo Mesa consists of mineral dust, and that because Oceano Dunes is two miles from the Mesa, the amount of dust coming from the park is [significantly less than 14%](#).

One might think that at this point State Parks, armed with proof that the air district has lied repeatedly, would tell the air district to pound sand and perhaps sue the APCD into oblivion.

Unfortunately, as we know all too well, State Parks executives chose instead to placate the APCD by subjecting Oceano Dunes to the air district’s Stipulated Order of Abatement (SOA). Under the SOA, State Parks has needlessly closed off and unnaturally covered more than 740 acres of the park’s recreational lands—basically half of the OHV riding area. In so doing, they have spent well over \$25 million of OHV Trust Fund monies for labor, materials, and consulting costs. Additionally, and unsurprisingly, they have gone out of their way to [suppress the Scripps](#) 14% dust findings, findings which underscore the waste and fraud State Parks has subjected itself to.

But it gets worse.

Each state park is within one of 21 State Parks districts, and each Parks District is managed by a district superintendent. The district superintendent is responsible for the day to day operations within a Parks District. They hire and manage staff and make and adjust operational budgets. They approve events at district parks, oversee emergencies, attend and present at pertinent city and county meetings, and when necessary, speak with local media. Most basically, the district superintendent is the local face

of a state park, and the best district superintendents advocate for their parks from a local perspective, as a member of the community that includes those parks.

The Oceano Dunes SVRA is within the Oceano Dunes Parks District. The district also includes the Oceano Campground on Pier Avenue, Pismo State Beach, the Monarch Butterfly Grove and the adjacent North Beach Campground, the Pismo Dune Preserve, and Oso Flaco Lake at the south end of the SVRA. All of these Oceano Dunes District features are deeply integrated into the south San Luis Obispo County community and its economy. But since 2017, State Parks executives have denied local district superintendent representation at Oceano Dunes. Instead, for nine years, they have assigned existing personnel into an “acting” district superintendent role. The current acting district superintendent is based in Sacramento and has served in the acting role for 14 months. A previous acting district superintendent stayed in that “acting” limbo for more than 7 years.

Assigning someone to an “acting” district superintendent position in the short term, say when an existing district superintendent retires, is understandable. It’s a temporary stopgap measure. But any “acting” district superintendent lacks independence. That person cannot be a true advocate of the parks within a community because they take their cues from Sacramento, always hoping that maybe, if they walk the line just right, they’ll be officially assigned to the position in a permanent civil service capacity.

When existing personnel are rotated into a district superintendent spot for nine years running, that sends a clarion message to the community from Sacramento that says, You are not our priority. But the community, and the OHMVR Commission, should know this too: By preventing a permanent district superintendent hire at Oceano Dunes, State Parks executives have broken the law.

As part of my correspondence with this Commission, I have compiled relevant video clips from archived records of OHMVR Commission meetings. The clips show that Chief Deputy Director Liz McGuirk and Deputy Director Sarah Miggins have violated civil service laws and the California Constitution by denying the south SLO County community a proper district superintendent for nine years. Specifically, their actions violate Article VII, Section 5 of the California Constitution, Government Code Section 19058, and Title 2, Section 265.1 of the California Code of Regulations. [This video compilation](#) draws a direct evidentiary line to these specific constitutional, statutory, and regulatory violations.

At the Commission’s upcoming meeting, I invite the Commissioners to thoughtfully consider the information provided in the video and this letter and to discuss the matter with the State Parks executives in attendance.

Respectfully,



Will Harris