Date: November 13, 2026

To: The California Off-Highway Motor Vehicle Recreation Commission

From: Will Harris, Sacramento, CA

RE: OCEANO DUNES: “It’s a cookbook!”

Dear OHMVR Commissioners,

You would have jumped up and out, if only the water had been boiling when you first stepped in. I tried to warn you. I told you several times over that you are bobbing within a cauldron of lies, a stew with public money and mortal chunks of Oceano Dunes and OHV recreation as main ingredients, a vile concoction created by the line cooks at the San Luis Obispo County Air Pollution Control District and served up in progressively disgusting courses by State Parks. But it was all for naught. Despite the evidence revealed to you, such as the Air District’s silica falsehood and the 14% dust findings by Scripps, and despite knowing that State Parks has accordingly misspent well over $25.2 million in public money and needlessly sacrificed more than 750 acres of public recreational lands at Oceano Dunes, you’re now just seasoning in the broth.

Your bemusement at your own predicament was on display at the Commission’s meeting last August. There you were told by a representative of the Air District’s “scientific advisory group,” or SAG, that the SAG has decided that “dust” and PM10 are synonymous and that State Parks is therefore responsible for all PM10 inland from Oceano Dunes that exceeds State air quality standards. This obviously is egregious, a scientifically invalid redefinition of both mineral dust from the dunes and PM10 that conveniently bypasses the Air District’s initial accusation and assumption that the PM10 is 100% mineral dust from the dunes. But though you appealed to State Parks executives to say it isn’t so, they almost admonished you not to worry, that there’s nothing they can do. They may well have said, the water is just right.

This kind of passivity exhibited by State Parks is a tell, an outward demonstration of the long-game manipulation and control that State Parks executives have exerted for years in the service of political expediency. In other words, I think it’s safe to say those in the governor’s office don’t take much of a shine to OHV recreation in general nor to Oceano Dunes specifically, and the political appointees of State Parks have acted accordingly. How else does one explain State Parks’s willingness to be subjected to the Air District’s open-ended Stipulated Order of Abatement even after it was revealed that the Air District lied about silica in PM10? Or Parks’s dismissal of the Scripps work, a published study which State Parks underwrote that disproved the Air District’s most basic claim that PM10 on the Nipomo Mesa was mineral dust from Oceano Dunes? Or State Parks’s legal passivity in defending the Oceano Dunes legislative mandate to provide OHV recreational opportunity at the park against the regulatory overreach of the California Coastal Commission? And how do you explain the nearly decade-long vacancy of the District Superintendent civil servant position at Oceano Dunes? If not in the service of political expediency, then please tell me. I’m all ears.

The significance of that last question is bolstered by the State Personnel Board. The SPB initiated a Special Investigation regarding the extended Oceano Dunes District Superintendent vacancy to determine potential violations of merit system and civil service law by State Parks. The investigation has thus far yielded some interesting numbers, such as:

- **One year.** That is the maximum length of time a civil servant may be appointed to another civil servant position in an acting capacity, per California civil service law.
- **14.5 months.** That is the amount of time a particular State Parks employee was most recently appointed by State Parks executives as acting district superintendent at Oceano Dunes—from January 1, 2025 to March 15, 2026.
- **7.5 years.** That is the amount of time a different State Parks employee had been appointed by State Parks executives as acting district superintendent at Oceano Dunes.
- **Three.** That is the number of times State Parks modified the job classification code of the acting district superintendent position at Oceano Dunes to make it appear as though that “acting” District Superintendent served three shorter term acting appointments rather than one longer illegal term.
- **More than 25.** That is the conservative estimate of the number of State Parks employees who have been impacted by acting appointment abuses at State Parks.
- **More than 113.** That is the number of people who applied to the district superintendent position at Oceano Dunes over several recruitment cycles undertaken by State Parks since 2019. At least 113 people. State Parks’ records are incomplete and so the total number is likely higher but cannot be discerned.
- **Fifty.** That is the number of people who applied in the 2024 recruitment cycle for the Oceano Dunes District Superintendent position. Fifty applicants in just one year.
- **Zero.** That is the number of people interviewed for the Oceano Dunes position from that 2024 applicant pool of 50 individuals. Not one.
- **Two.** That is the number of people formally interviewed in 2026 for the District Superintendent II position at Oceano Dunes. Only two. One of those individuals was, at the time of his interview, the “acting” District Superintendent at Oceano Dunes. As noted above, he was appointed by State Parks executives to that acting role and served at their behest for 14.5 months, in violation of merit system law. Unsurprisingly, this person was ultimately “awarded” the permanent District Superintendent II spot at Oceano Dunes, due in large part to the unfair incumbency advantage he garnered from his “acting” role and because only one other person was interviewed for the job.

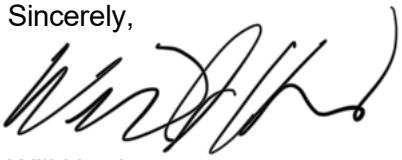
The final results of the SPB’s Special Investigation have not yet been publicly released. But it is known that they have asked State Parks to submit a “Corrective Action Response.” State Parks prepared the document, which was subsequently rejected by the SPB, and so the investigation remains subject to SPB's review of State Parks’ resubmittal. In their review of State Parks records and applicable law, SPB staff noted, “Obviously, the ability to act in the position gave the candidate an advantage." And CalHR staff consulted for the investigation noted, “Prolonged

OOC [acting appointment] usage can also be seen as circumventing the merit process by giving higher-level experience to select employees."

I have previously asked this Commission to invite the SPB to an upcoming commission meeting to present the findings of their Special Investigation. The Commission has not yet deliberated on the merits of that request. I hope that you do, and ultimately hear directly from the SPB.

Bon appétit!

Sincerely,



Will Harris
California Geological Survey (retired)