

Date: November 20, 2025
From: Will Harris
To: The California Off-Highway Motor Vehicle Recreation Division
For: OHMVR Commission Meeting on November 19, 2025

Regarding: The Oceano Dunes Beach Rake Investigation

Dear Commissioners,

The mechanical beach rake is used on many public beaches to clear potentially harmful debris such as glass and metal from recreational areas of sand. The typical beach rake is about 10 feet wide and pulled by a tractor. It has two rotating sets of metal tines that extend into the sand. One set of tines brings buried debris to the surface, and the other set lifts the debris from the surface to a sifting hopper that trails the beach rake.

It's fair to say that the process fluffs the sand to a depth of 6 inches or more as the rake cleans the sand of debris.

In 2018, the OHMVR Division purchased one of these rakes to use at Oceano Dunes. It cost about \$180,000. Unfortunately, it has not been used for its intended purpose.

In May 2024, the Scientific Advisory Group, or SAG, used the beach rake to determine if the machine's raking action would affect the dust emissive potential of the sand at Oceano Dunes. For that investigation, two side by side areas were delineated, and the SAG measured the emissive potential of both areas. Then, one area was raked using the machine and the other was not. The emissive potential of both areas was then measured again.

The results showed that the fluffing action of the beach rake did not affect the emissive potential of the Oceano Dunes sand. Per the SAG, the investigation results indicated that "mechanical raking had no discernible effect on altering surface emissivity."

But that is only the start. The field work for this beach rake investigation was initiated in May 2024, just five days after the OHMVR commission held its May 15, 2024 Oceano Dunes tour. Yet neither State Parks nor the SAG mentioned the planned investigation to the Commission at that time.

State Parks is supposed to give the Commission regular updates regarding Oceano Dunes and its activities associated with the stipulated order of abatement imposed by the SLO County Air District—the APCD. State Parks provided its most recent Oceano Dunes update to the Commission in June 2025. That update regarded only operational information, including a report on a sand castle building contest.

State Parks did not mention activities related to the APCD, the SOA, the SAG, or PM10. And most certainly, State Parks did not provide the Commission with an update regarding the beach

rake investigation where, as mentioned, the SAG concluded that “mechanical raking had no discernible effect on altering surface emissivity.”

Yet somehow, after seven-plus years of trying to quantify it—and counting—the SAG insists that OHV activity at Oceano Dunes does affect emissivity.

Like the beach rake investigation, this whole APCD SOA mess is all fluff and no dust.

Sincerely,

Will Harris