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September 15, 2022

OHMVR Division & OHV Commissioners
PO Box 942896,
Sacramento, California 94296

RE: OHV Commission Hearing September 16, 2022; Agenda Item XI

Dear State Officials,

Friends of Oceano Dunes ("Friends") submits these comments on Agenda Item XI. Friends is a California not-for-profit corporation, representing approximately 28,000 members and users of the 2 million annual visitors to the Oceano Dunes State Vehicle Recreation Area ("SVRA").

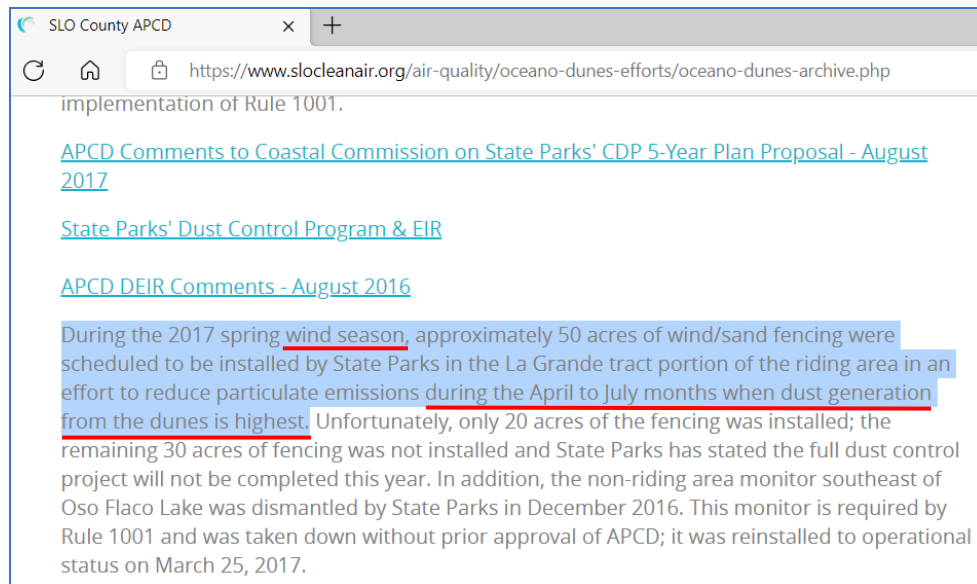
We ask that the OHV Commissioners, step in and demand State Parks prove to you the following:

1. **What percentage of PM10 being measured at the CDF is mineral dust from the Oceano Dunes?**
 - a. SOA goal is to reduce State/Federal exceedances measured at CDF (not emissivity).
 - b. Parks and APCD will point to emissivity measurements... however, there has been no correlation between emissivity at the Oceano Dunes and PM10 measured at the CDF.
 - c. The SCRIPPs study proved that only ~14% of the PM10 being measured at the CDF is mineral dust. Not 100% as is assumed in the SAG/DRI models.
 - i. Of the 14% of mineral dust, what is natural and what is from OHV?

2. **What have been the reductions in the State Standard for PM10 being measured at the CDF over the past 5 years?**
 - a. Parks has reduced the OHV park acreage by 50% and reduced camping and OHV use by 75%... **Have we seen a correlation in reductions of the State Standard for PM10?**
 - b. Parks and APCD will try to redirect to focus on emissivity at the dunes and their model forecasting.
 - i. Ask if the model has been updated to reflect only 14% mineral dust at CDF instead of the 100% assumed in their model.
 - ii. Ask for proof the model has been validated.

In support of these questions, we offer the following information to aide you in understanding the grave misjustice occurring at the Oceano Dunes.

First, the APCD’s website describes the “wind season” as April to July “**when dust generation from the dunes is the highest**” (see excerpt from APCD website below).



The Stipulated Order of Abatement (SOA) is clear, the goal of 50% reduction of the “state and federal ambient PM10 air quality standards;” measured downwind at the CDF. The State Standard is more severe than the federal standard...therefore we are focusing on the state standard in this writeup.

The SOA goal of 50% reduction of PM10 is to meet state/federal standards measured at the CDF... not based on emissivity measurements at the Oceano Dunes.

When you look at Figure 1 below, it shows the CDF monitoring by year during the “wind season”. This data shows that the state violations have gone up ...not down.

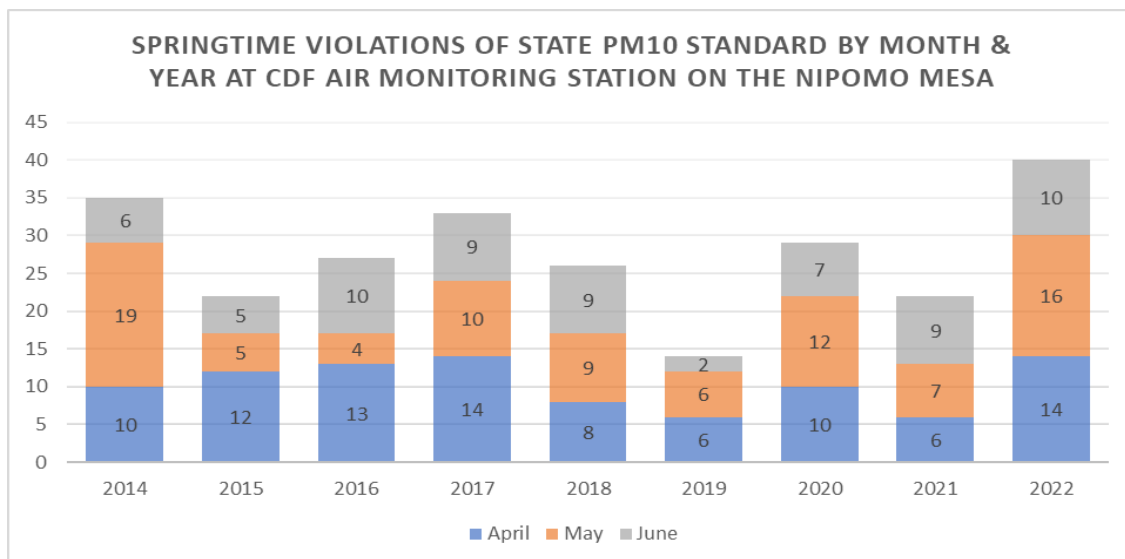


Figure 1 – State violations of PM10 measured at CDF (April, May & June) for the past 9 years.

When you look at the same chart and add in the acreage that has been removed from OHV use (red line) you will see there is no correlation (see Figure 2 below). Nearly half of the 1,500 acres provided for OHV and camping has now been reduced by 710 acres (410 dust mitigation and 300 acres from State Parks closing the 300 acres of seasonal bird exclosures).

This lack of correlation between acreage and PM10 violations agrees with the SCRIPPs report and DOES NOT agree with the emissivity argument fabricated from Pi-Swerl measurements.

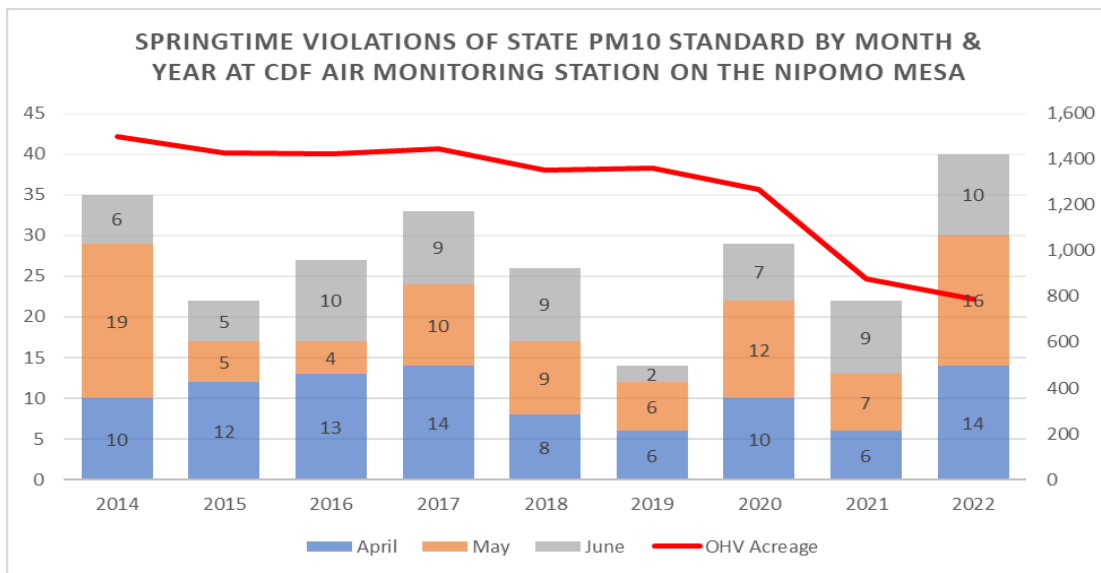


Figure 2 – 710 acres fenced off and planted with no correlation (~50% of OHV Acreage).

This gets even more exacerbated when you recognize the following reductions to camping and OHV use and the elimination of night riding (green line). The historical 1,000 campsites have been reduced to 250 and let's not forget the park was closed for COVID in 2020 (see Figure 3 below).

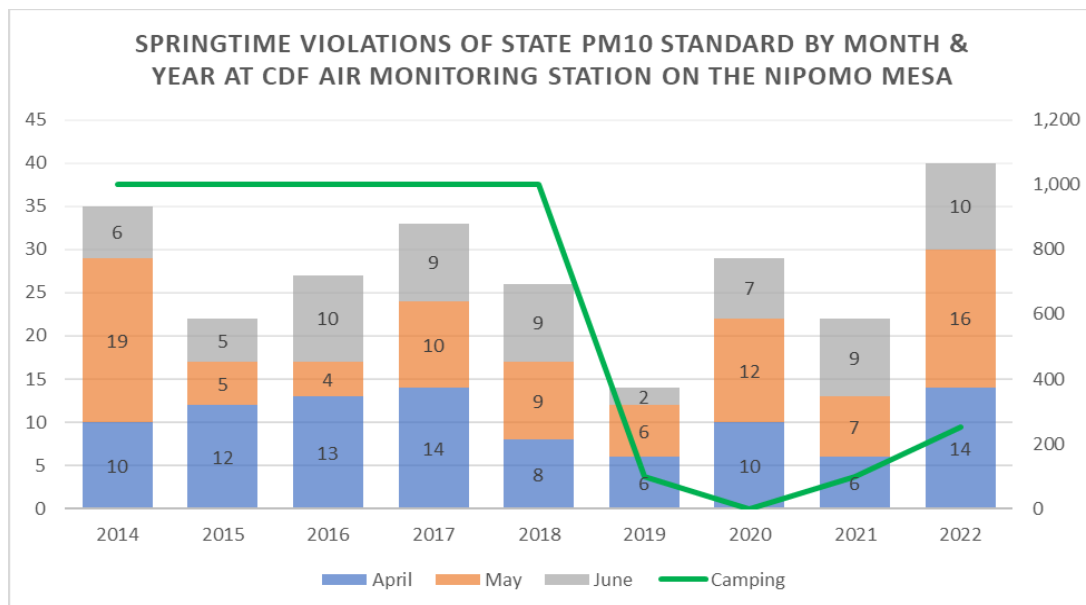
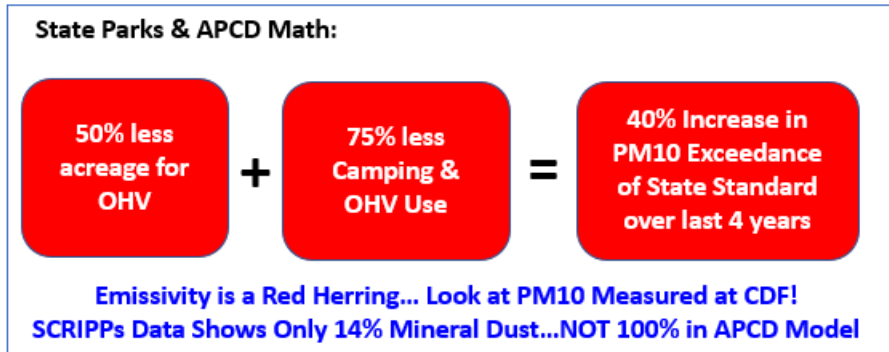


Figure 3 – Reduction in camping and OHV use shows no correlation

So, lets boil this down to the most simplistic of terms.

- OHV Acreage has been reduced by 50%
- Camping and recreational use has been reduced by 75%
- PM10 being measured downwind has gone up ~40% (over the last 4 years)



Friends asks that this Commission weigh in heavily to ensure no further closure of Oceano Dunes SVRA, and that areas previously closed based on junk science be reopened immediately.

Sincerely,

Jim Suty
President – Friends of Oceano Dunes

CC: Tom Roth
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