

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
427-4863

**W7b****STAFF REPORT:
REGULAR**

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Staff:	SG
Staff report:	07/21/99
Hearing Date:	08/11/99
Commission Action	

Application Number 3-99-024

Applicant Oceano Homeowners Beach Maintenance Committee

Agent Harold Guiton

Project Location Along and seaward of an unimproved portion of Strand Avenue, between Surf and Brooks Streets, in the unincorporated community of Oceano, San Luis Obispo County (APNs 061-062-001, 002, 010, 014 through 017; 061-071-001, 002, 012 through 014, 042, 043; 061-072-016, 18 through 020, 030, 031; and 061-091-019)

Project Description Relocation of between 1,000 and 4,000 cubic yards of drift sand annually from beside and in front of residences fronting on the beach, by bulldozing the sand seaward from the residences to below the mean high tide line in order to protect the residences from being engulfed by wind-blown sand.

Local Approvals Received County of San Luis Obispo Minor Use Permit D960166P

File Documents County of San Luis Obispo certified Local Coastal Program, San Luis Obispo County Minor Use Permit/Coastal Development Permit D960166P, Coastal Commission Emergency Permit 3-99-038-G

Staff Recommendation Approval with Conditions

Staff Summary

Residential development on beach-fronting, filled portions of Oceano Lagoon in the unincorporated community of Oceano in southwestern San Luis Obispo County has resulted in

houses subject to inundation by blowing sand. Oceano lies near the northern end of the Nipomo-Oceano dunes complex, the second largest dune field on the California coast.

Large amounts of sand are deposited on the beach by wave action in the spring and summer months. Typically during the summer and fall, wind blows the sand landward creating dunes which advance toward the houses and grow vertically. The end result is dunes that block views from the houses and, more important, threaten to engulf the houses. The homeowners have used heavy equipment to move the sand back toward the ocean to relieve the threat of inundation and to reestablish ocean views. In May of this year, subsequent to submittal of this regular permit application, sand accumulation was so great that the applicant applied for and was granted an emergency permit to move the sand seaward from the houses. This permit application constitutes the follow-up regular permit application required after granting of an emergency permit.

A related item is the applicants' claim that the grading of the dunes should be exempt from the permit requirements of Coastal Act Sections 30600 or 30601 by reason of a vested right under Coastal Act Section 30608. That claim is subject to a separate determination by the Commission at a subsequent meeting.

Staff is recommending that the Commission approve a coastal development permit with conditions to allow the proposed work through the end of 2000 and that the applicant then undertake a program to vegetate the dunes and install sand fences to stabilize the dunes and thereby reduce the amount of sand reaching the houses. This will avoid or minimize the need for cyclical grading of the dunes.

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I. STAFF RECOMMENDATION

A. Staff Recommendation on Coastal Development Permit:

Staff recommends that the Commission, after public hearing, approve the proposal as conditioned.

MOTION: *I move that the Commission approve Coastal Development Permit Number 3-99-024 subject to the conditions below and that the Commission adopt the resolution of Approval with Conditions.*

Staff recommends a **YES** vote on the preceding motion. This would result in approval of the project as conditioned. A majority of the Commissioners present is required to pass the motion and adopt the following resolution:

RESOLUTION: *Approval with Conditions*

The Commission hereby grants a coastal development permit subject to the conditions below, for the proposed development on the grounds that the development, as conditioned, will be in conformance with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local government to maintain a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act, is located between the sea and the first public road nearest the shoreline and is in conformance with the public access and public recreation policies of Chapter 3 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

B. Standard Conditions

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

C. Special Conditions

1. Project Authorized

For the sole purpose of preventing physical damage to existing residences, this permit authorizes the applicant to grade the sand dunes seaward of the subject parcels and deposit sand below the mean high tide line through December 31, 2000, and to vegetate the dunes and install sand fences, subject to Special Conditions 2, 3, 4, and 5, below. The limits of work authorized by this permit are shown on Exhibit 4, attached. This permit does not authorize any grading for the purpose of maintaining private residential views.

2. Dune Management and Stabilization Plan

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, permittee shall submit to the Executive director for review and approval a dune management and stabilization plan that shall include eradication of non-native species and vegetating the dunes with native species. Stabilization shall be accomplished primarily through establishment of native dune vegetation, using seeds collected from native species found in the foredune environment within the Nipomo-Oceano dunes complex. The

plan shall describe and provide for initial maintenance, monitoring, and replacement of vegetation as necessary, for a period of five years after initial installation. Any interim measures such as off-road vehicle exclusion markers, temporary plank paths, pedestrian boardwalks or sand ladders, sand fences or mulch mats needed to establish native plant cover, shall be identified. The plan shall specify those conditions under which minor grading may occur (e.g., removal of sand from the immediate vicinity of existing houses if blowing sand overtops the dunes and accumulates in yards, and the timing and method of disposal of sand into the intertidal zone). The dune management and stabilization plan shall be approved by the U.S. Fish and Wildlife Service, the Department of Fish and Game, the Department of Parks and Recreation, and San Luis Obispo County prior to its submittal to the Executive Director.

3. **Department of Parks and Recreation Approval Required**

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, permittee shall submit to the Executive Director current written evidence of approval from the Department of Parks and Recreation (DPR) for sand moving operations and vegetation management on property owned by DPR.

4. **County of San Luis Obispo Approval Required**

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, permittee shall submit to the Executive Director current written evidence of approval from the County of San Luis Obispo for sand moving operations and vegetation management on property owned by the County. Any portions of the project not within the Commission's original permit jurisdiction (illustrated on Exhibit 4, attached), shall be subject to the County's own coastal permit jurisdiction and are not part of this approval.

5. **Corps of Engineers Approval Required**

PRIOR TO CONTINUATION OF GRADING AFTER THE DATE OF COMMISSION ACTION ON THIS PERMIT, permittee shall submit to the Executive Director written evidence of approval from the Corps of Engineers for disposal of sand below the mean high tide line.

6. **State Lands Commission**

While the State Lands Commission has indicated that the limits of the State sovereign lands are at present not determined in this area, permittee is advised that upon such determination being made in the future, any portion of this project falling within the jurisdiction of the State Lands Commission shall be subject to any additional conditions, restrictions, or limitations, including termination, which may be imposed by that agency with respect to State tidelands.

II. FINDINGS AND DECLARATIONS

A. Project Location and Description

The project is located in a residentially developed area in the unincorporated community of Oceano in southwestern San Luis Obispo County. Strand Avenue, shown on Exhibit 4 as a 60 foot wide street seaward of the small residential lots, is an undeveloped County right-of-way. Seaward of Strand Avenue the land is owned by State Parks and operated as part of the Oceano Dunes State Vehicular Recreation Area (ODSVRA). The main access to ODSVRA is via Pier Avenue, at the north end of the residential area. From there, most vehicles turn south and travel downcoast in front of the site of the proposed grading to reach the off road ride areas and most popular beach and dune camping areas.

The permit and appeal jurisdiction boundary as shown on Exhibit 4 are configured as they are because Arroyo Grande Creek formerly flowed through the central part of the now-residentially developed area until it was re-routed into a channelized section about 300 yards to the south and its former course was filled. The area just inland from Laguna Drive at the inland edge of the residential area is a marshy area that is part of Oceano Lagoon fed now by Meadow Creek, which flows into the lagoon from the north. The lagoon empties into Arroyo Grande Creek near the southeast corner of Laguna Drive and Brook Avenue.

The applicant proposes to redistribute the sand that accumulates adjacent to the houses, towards and into the intertidal zone. The work will be done by means of a bulldozer grading the sand seaward, flattening any existing dunes and creating a relatively level sand sheet extending from the houses seaward approximately 50 yards (see Exhibit 3). The actual area of grading within the Commission's permit jurisdiction is irregularly shaped (see Exhibit 4) and covers an area approximately 5 acres in size. The work would generally take place about once or twice a year although in some years there may be little sand to move while in other years, such as this past spring, accumulations can be significant.

B. Background Information

Coastal dunes are a limited resource of statewide significance. Oceanfront dunes provide unique scenic, recreational and habitat values. The Nipomo-Oceano dunes are the second largest coastal dune field in coastal California, with only the dune field around the southern end of Monterey Bay being arguably larger. The dunes along the south coast of San Luis Obispo County begin on the north at Pismo Creek near the south end of the City of Pismo Beach and extend south along the shoreline for approximately 20 miles to Point Sal in Santa Barbara County, just south of the Santa Maria River. The older, heavily vegetated, stabilized dunes extend as much as 11 miles inland. The younger, less vegetated, more active dunes extend inland up to about 1.5 miles and cover approximately 20 square miles (See Exhibit 6).

Every year in the spring and summer, onshore winds blow sand inland from the beach. The amount of sand and height of accumulation depend on the amount of sand available for transport by the wind and the force, duration, and direction of the prevailing wind. Some years see only minor sand accumulation while this past spring the sand accumulated rapidly. In years of heavy accumulation, the sand can advance toward the houses, overtop fences, cover yards and pile up against the houses, scour exposed surfaces, and partially bury the street ends that lie perpendicular to the beach.

From about Surf Avenue north, the dunes are vegetated with both native and non-native plants and are stable. The northern half of this area was vegetated with native plants over a width of beach equivalent to the southern bulldozed width. Here the dunes are stabilized and the sand generally does not advance toward the houses in any significant amount although the dunes have grown in height, leading to some loss of ocean views for the residents. The southern half of the area north of Surf Avenue was bulldozed flat and allowed to vegetate with European beach grass (*Ammophila arenaria*), an invasive non-native species widely planted decades ago for dune stabilization in the general vicinity. Here, because of the very large sand trapping capability of *Ammophila*, the sand movement toward the houses is generally insignificant although there has been consequent growth in dune height.

South of Surf Avenue, in the project area, the dunes are mostly barren sand and are unstabilized. This past spring strong almost incessant winds out of the northwest blew large amounts of sand toward the houses – more than typically accumulates in several years. Because of the large amount of sand and the threat it posed to the physical safety of the residents and the structural safety of the houses, the Commission granted an emergency permit to remove the sand and redeposit it below the mean high tide line. The current regular permit application serves as the regular permit application required subsequent to granting of an emergency permit.

Part of the project area is in the coastal permit jurisdiction of the County of San Luis Obispo. In 1997, the County granted a permit valid for six years for the removal of sand in the area of the County's permit jurisdiction, to the south of the Commission's permit jurisdiction. See Exhibit 4 for illustration of jurisdictional boundaries.

The underlying ownership of the project area is almost entirely public: the County (which previously authorized use of Strand Avenue, a "paper" street); the California Department of Parks and Recreation (letter of non-objection dated 4/5/94 and subsequent confirmation by telephone 7/20/99); and possibly State Lands Commission (letter of 8/26/97 indicating indeterminate status). This permit is conditioned to ensure continued coordination with these agencies. The area covered by this permit encompasses that portion of the project area remaining in the Commission's "original" permit jurisdiction. Therefore, the policies contained in Chapter 3 of the Coastal Act, rather than the certified San Luis Obispo County LCP constitute the standard of review for coastal development permits.

C. Sand Dunes as Environmentally Sensitive Habitat

Section 30240.

(a) *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*

(b) *Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

While often appearing barren and devoid of life, sand dunes can support a variety of species but may at certain times of the year or for a year or more at a time not evince any signs of harboring plant or animal species. Then, when temperature, moisture, and disturbance conditions are right, plants can germinate and appear on the surface of the dunes. This phenomenon has been well documented at the dunes around the southern end of Monterey Bay. Because dunes that are not disturbed can and do support threatened and endangered native species, dunes generally are considered to be environmentally sensitive habitats.

While no sensitive species have been identified on this particular portion of dunes, such species do occur at other sites nearby. For example, the Western Snowy Plover listed as a threatened species by the U.S. Fish and Wildlife Service, nests in barren foredunes just to the south across Arroyo Grande Creek. Two plants considered threatened by the Department of Fish and Game, surf thistle (*Cirsium rothophilum*) and beach spectacle-pod (*Dithyrea maritima*), are known to occur within a few miles of the subject dunes.

While it is unknown just what plant seeds the dunes may harbor, because of the history of ongoing manipulation of the dunes it may be that conditions are never prime for seeds to germinate or that they do not have a chance to establish a viable community before the next cycle of grading occurs. Although grading has been necessary to protect the houses, that is only because the dunes are not vegetated and are therefore not stable and can build and move rapidly. If stabilized, the dunes would not threaten the houses. It does appear likely, based on the growth of non-native European beach grass (*Ammophila arenaria*) just north of the proposed grading, that if the dunes were not actively vegetated with native species, *Ammophila* would probably establish itself on the dunes and inhibit sand movement toward the houses. However, areas of *Ammophila* are low in biodiversity and present an unpleasant experience for those who attempt to walk through them barefoot, the grass having relatively sharp blades. Thus, because the aggressive, invasive nature of *Ammophila* would allow it to colonize the undisturbed dunes at the expense of native species, it is important to not just allow the dunes to vegetate "naturally."

Therefore, the proposed grading, comprising a program of periodic bulldozing to retard the natural formation of dunes, can not be found consistent with the purposes of Coastal Act Section 30240 and must be phased out as a regular practice. Instead, through dune stabilization, impacts on the natural dune formation process can be avoided, while at the same time the risk to the existing residences from sand dunes "on the move" can be minimized. Such stabilization would best be achieved through establishment of native dune plant cover.

In order to ensure that native species become established a vegetation and dune management plan is necessary. The plan should include details of species to be used, method of propagation and planting, monitoring and maintenance of the vegetation. Such a plan would need to provide for minor grading as needed to remove sand that does overtop the vegetated dune and threatens physical destruction of the existing houses.

One potential environmental drawback or tradeoff of vegetating the dunes would be the potential loss of habitat for the Western Snowy Plover, which prefers barren sand for nesting. However, none have been observed nesting in the area of dune grading. Plovers do nest south of this site, south of Arroyo Grande Creek where State Parks maintains an on-going Plover management program. Because no Plovers have been observed nesting in the area of grading and because of the relatively small area that would be vegetated (less than a quarter mile of potential Plover habitat out of a total of about 20 miles of potential Plover habitat), the potential to adversely affect Plover habitat is insignificant.

Therefore, this permit is approved subject to conditions which will ensure that the proposed grading is limited to that which is necessary for transitional purposes through the year 2000, along with minor maintenance grading to remove blow sand which overtops the future reestablished dune and would otherwise physically damage the existing residences. This limitation on grading, along with the implementation of a dune stabilization and vegetation plan, and permit coordination with the principal natural resource management agencies (DPR, Calif. Dept. of Fish and Game, and the U.S. Fish and Wildlife Service) will ensure conformance with Coastal Act Section 30240 regarding environmentally sensitive habitats.

D. Public Views

Section 30251.

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation

and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The Coastal Act does not protect private views. Here, the views protected by grading of the dunes are the property owners' private views of the ocean and coast. Although public views of the ocean from the street ends would be maintained by the dune grading, the residential area is not frequented by the public seeking ocean and coastal views and, even if it were, a short walk into the dunes would provide coastal views to the public. Public views are afforded to a much greater extent at the end of Pier Avenue, a quarter mile north, where there is a public parking lot and where vehicular and pedestrian access to the beach is available.

Grading of the dunes is development that maximizes the alternation of natural landforms and is not visually compatible with the character of surrounding areas. To the north of the site, seaward of some of the houses along Strand Avenue, the dunes have been vegetated and are not graded. To the south across Arroyo Grande Creek, where the dunes are undeveloped, the dunes are vegetated and are not graded. Grading results in the destruction of the natural dune configuration and a relatively flat sand sheet, clearly not visually compatible with the surrounding area. The area of grading is highly visible and highly scenic. It is visible from the residential area itself and from the beach in front of it and from the beach south of it. Accordingly, grading of the dunes in this case comprises development that is not subordinate to the character of its setting.

Therefore, this permit is conditioned to allow the reestablishment of the dune between Strand Way and the beach. This will avoid alteration of a natural landform, ensure visual compatibility with adjacent areas, and protect public views by screening the residences as seen from the beach. Only minor grading will be allowed, to ensure safety of structures and allow for development of a dune vegetation and management plan. Accordingly, as so conditioned to protect public visual resources, the project will be consistent with Coastal Act Section 30251.

E. Hazards

Section 30253.

New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

The proposed grading would minimize risks to property that occur with the deposition of sand against houses. The occasionally large accumulations of sand do constitute a geologic hazard. On the other hand, the proposal to continue the cyclical grading contributes to geologic instability and increases the risks to property. The graded sand is essentially kept in a mobile state and is never allowed to become stabilized but is blown back up toward the houses and then graded down again. If the sand were stabilized before it reached the houses, the hazard of blowing sand accumulating against the houses would be eliminated.

As conditioned, this permit would limit grading to that necessary for transitional purposes through the year 2000. The transition would be from a cyclical dune buildup-and-bulldoze down management arrangement to a more natural management arrangement that would stabilize the dunes, truly minimize risks to life and property, and assure geologic stability of the dunes.

Therefore, as conditioned to eliminate the cyclical grading and concomitant perpetual dune instability, by limiting grading to minimal maintenance and transitional purposes and requiring stabilization of the dunes through a vegetation program, the project is consistent with Coastal Act Section 30253.

F. Public Access

Section 30211.

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212.

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

- (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,*
- (2) adequate access exists nearby. . . .*

Virtually the entire project area comprises public lands (State Park lands, County road right-of-way, possible State Tidelands), with intense public use of the beach strip at the water's edge. The public has access to the beach from the street ends and, as mentioned above in the section on views, from the end of Pier Avenue. During the time of any grading operations and on the portion of the dunes being graded, access could be inhibited by the operation of heavy equipment. However, this would be only a minor inconvenience of limited duration. Access to the beach from the street ends could be inhibited by reestablishment of the dune landform as contemplated by this permit. However, this would not impair public access rights. In any

event, the street ends are used mostly by residents and/or vacation renters, and not by significant numbers of the general public. Most public access occurs at the end of Pier Avenue, within a quarter mile of the area proposed for grading.

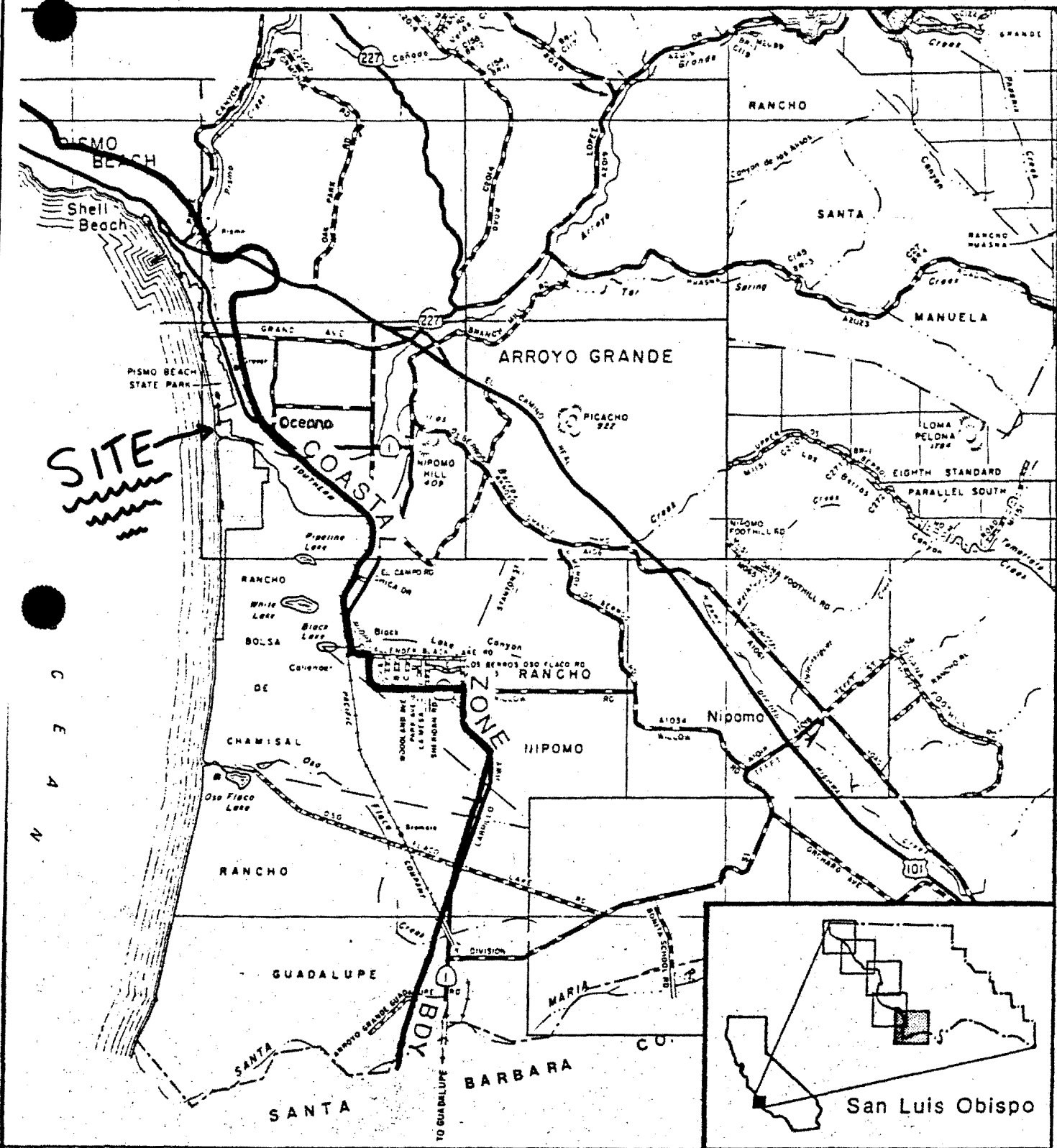
With respect to fragile coastal resources, encouragement of public access via Pier Avenue has allowed the establishment of both native and non-native vegetation on the dune surface immediately to the north of the project site. The dune management and stabilization plan, required by this permit, will need to include measures to avoid trampling impacts from both local resident and general public use. Examples of appropriate measures would include, but not be limited to, signage, redirection of use to less sensitive areas or street-end corridors, temporary plank walks or permanent boardwalks.

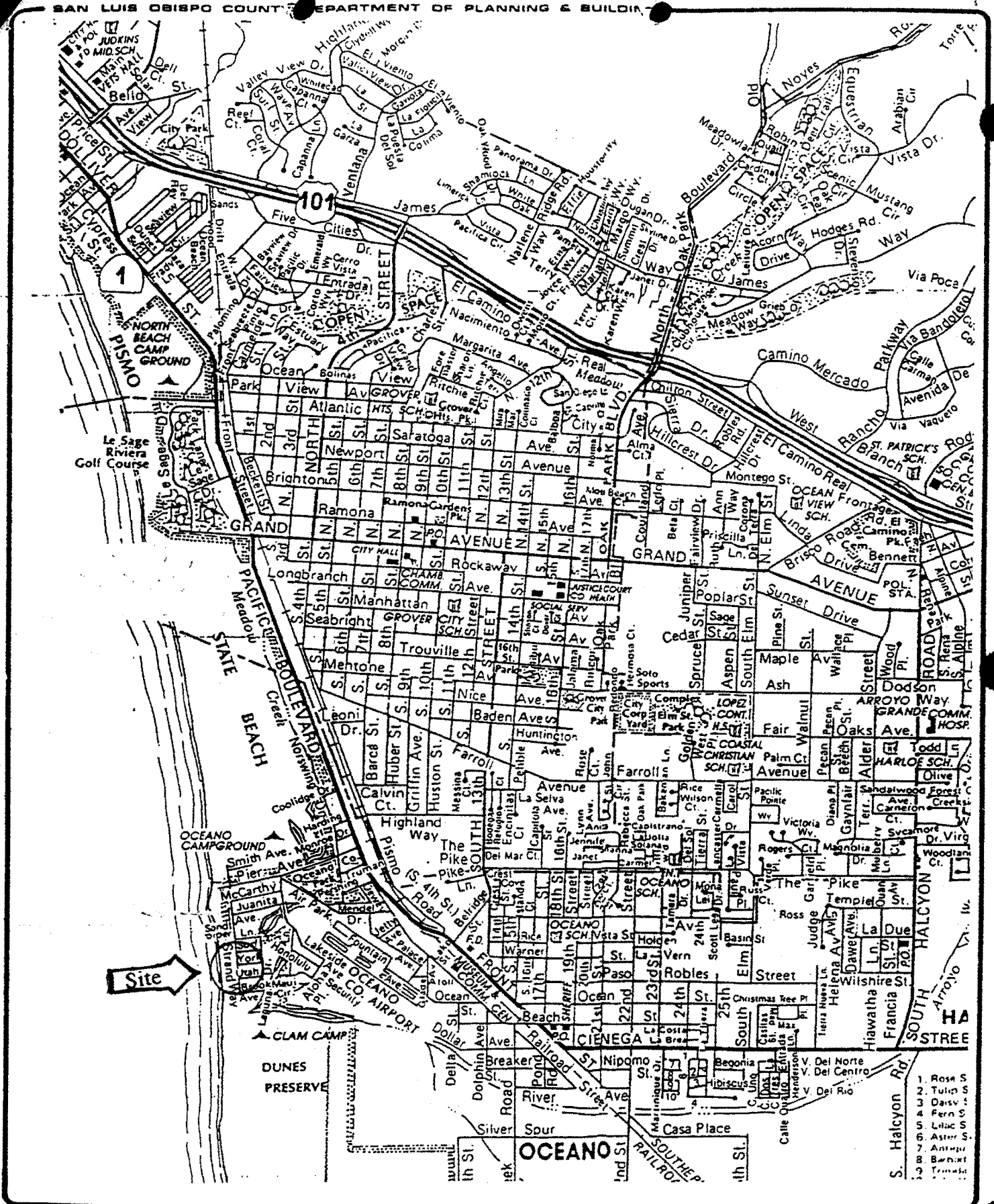
Therefore, because adequate access already exists nearby, and the measures needed to protect fragile coastal resources may result in the redirection but not loss of public access, the project, as conditioned, will be consistent with Coastal Act Sections 30211 and 30212.

G. California Environmental Quality Act (CEQA)

Section 13096 of the California Code of Regulations requires that a specific finding be made in conjunction with coastal development permit applications showing the application to be consistent with any applicable requirements of CEQA. Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effects which the activity may have on the environment. The Coastal Commission's review and analysis of land use proposals has been certified by the Secretary for Resources as being the functional equivalent of environmental review under CEQA. Accordingly, the Commission finds that the project as proposed could have significant adverse effects on the environment within the meaning of CEQA; and that there are feasible alternatives and mitigation measures which would significantly reduce the project's adverse effects.

The special conditions attached to this permit provide for the approval of a feasible alternative method of protecting the existing residences from encroachment by moving sand dunes. Appropriate mitigation measures are incorporated to ensure stability, encourage native plant habitat, and protect public views. Accordingly, only as conditioned can a finding of conformance with CEQA requirements be made.





PROJECT
 Minor Use Permit (D960166P)
 Oceano Homeowners Beach
 Maintenance Association

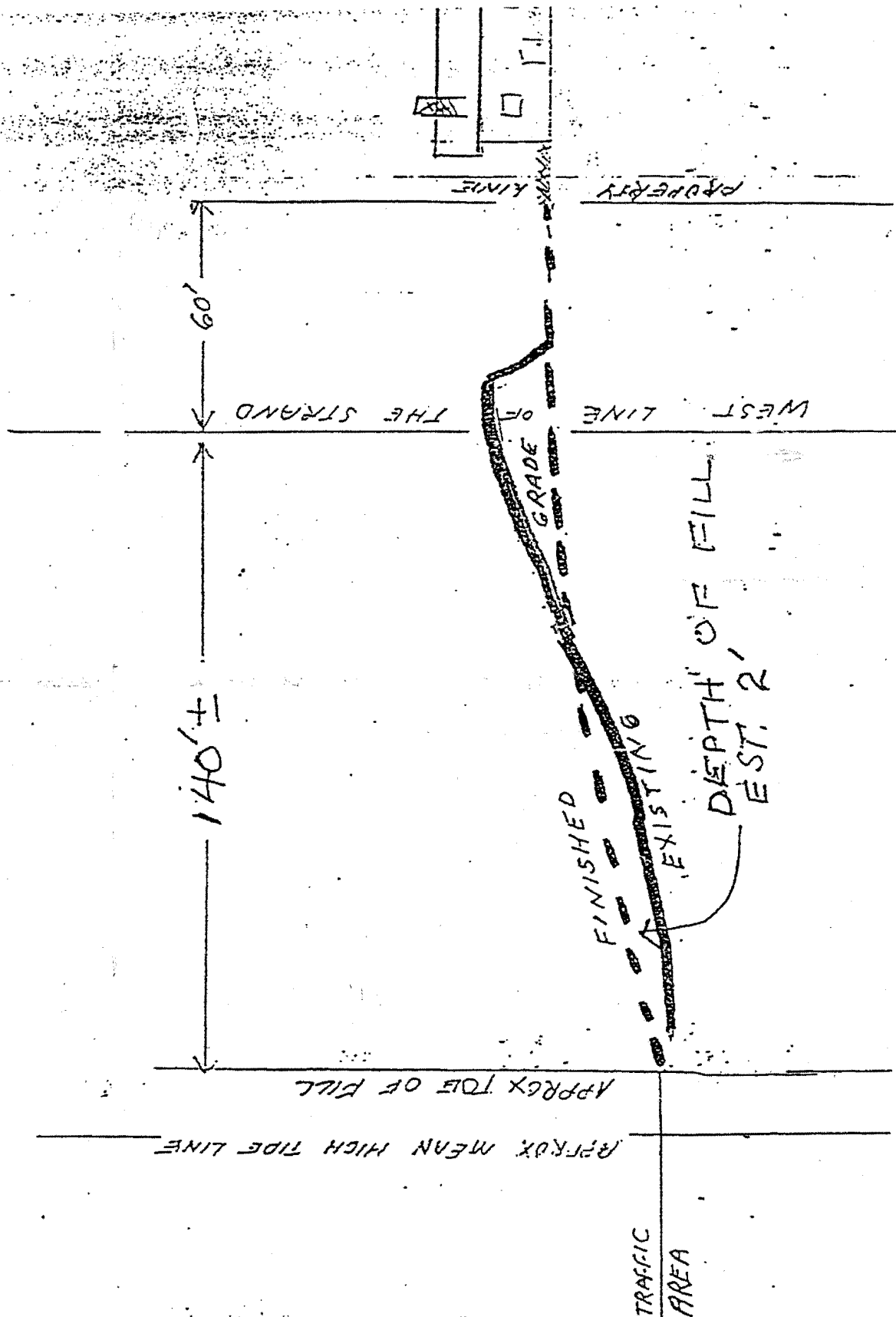


EXHIBIT

Vicinity Map

EXHIBIT 2

3-99-024



PROJECT

Minor Use Permit (D960166P)
 Oceano Homeowners Beach
 Maintenance Association

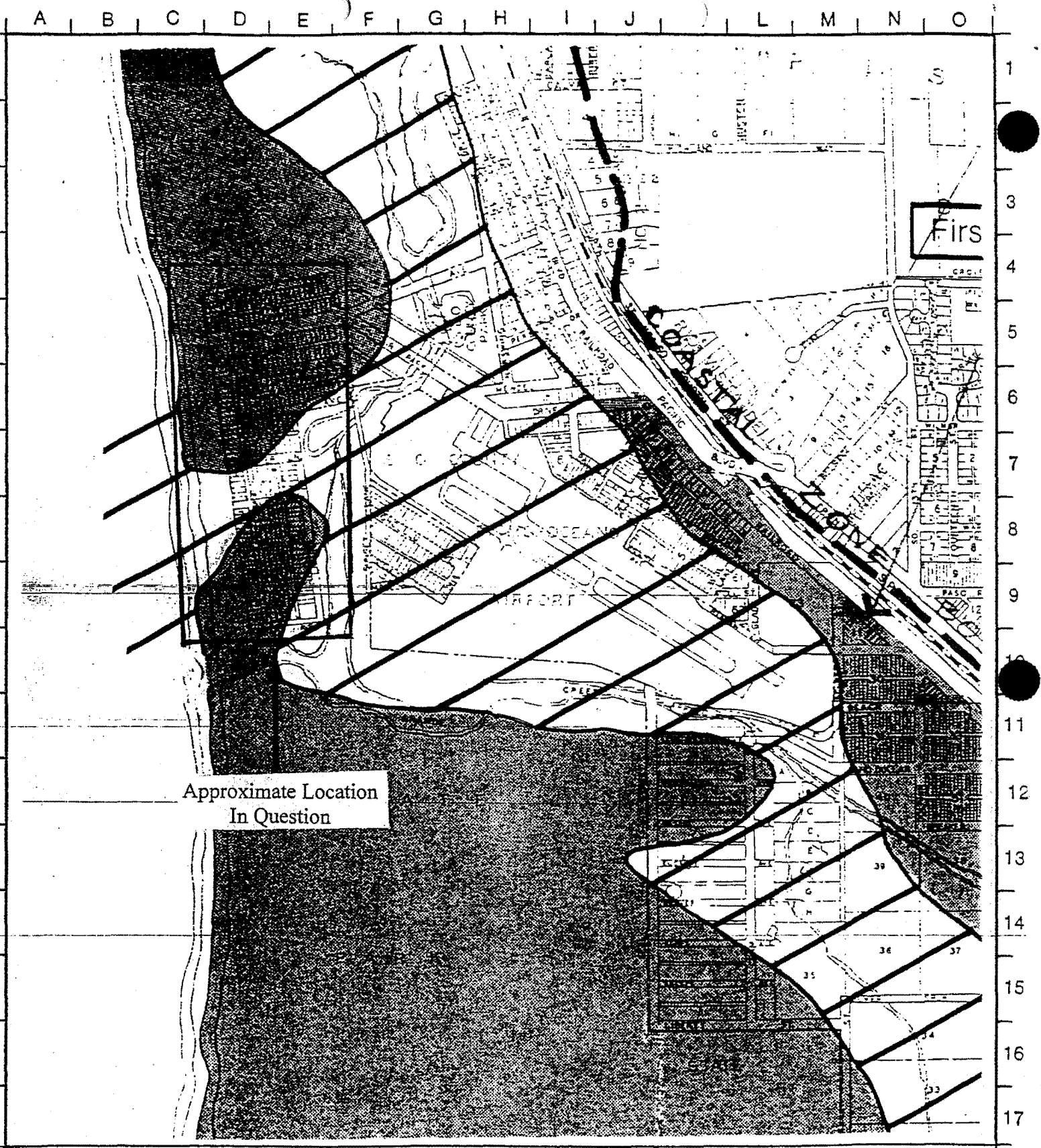


EXHIBIT

Cross Section

EXHIBIT 3

3-99-024



BD 20-99
APN 061-01,02,06,07,09

 California Coastal Commission

Portion of San Luis Obispo
County's adopted Post-LCP
Certification Map #109
(Oceano Quadrangle)



County of San Luis Obispo

EXHIBIT 4
3-99-024

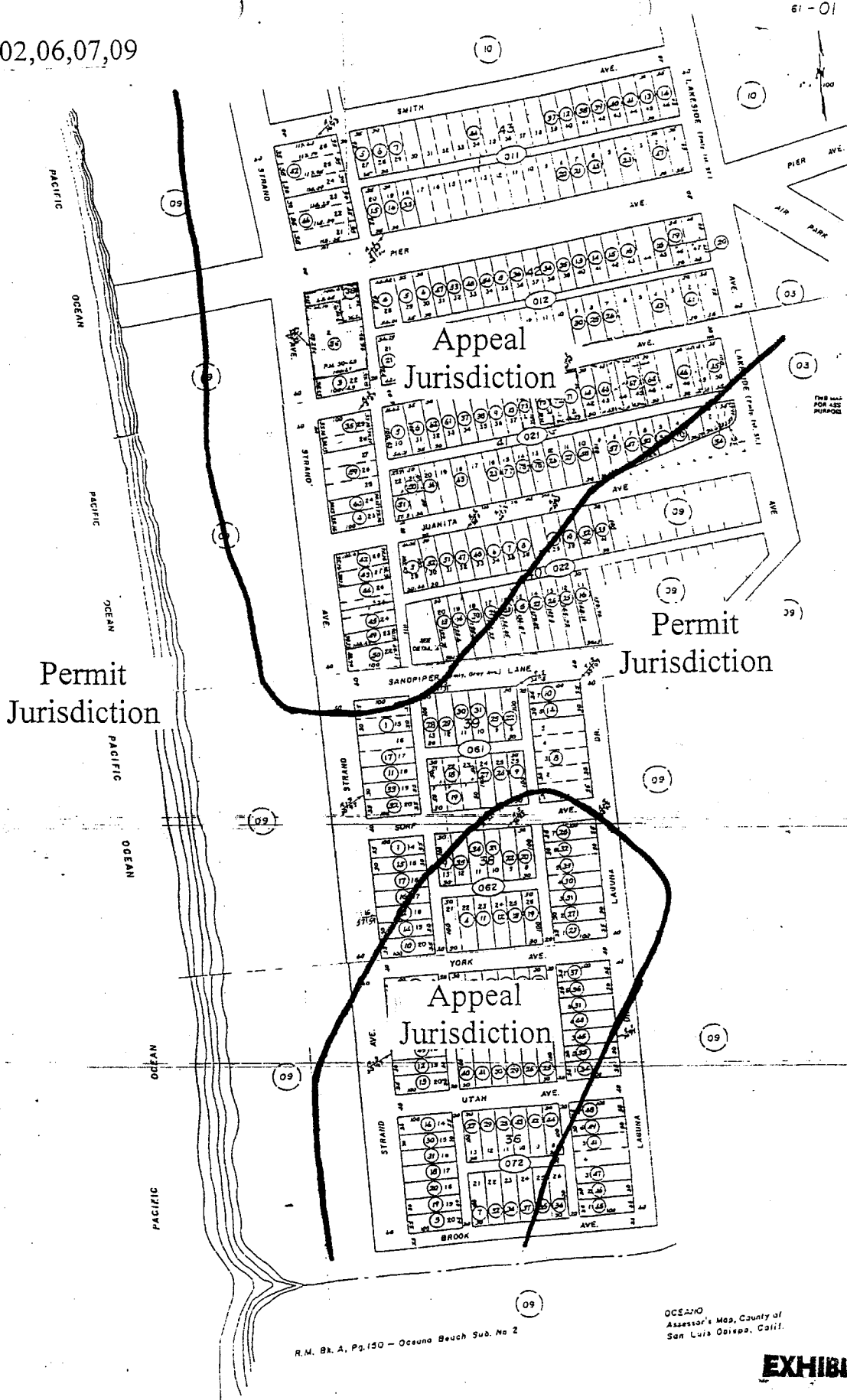


EXHIBIT 4 p.2

3-99-024

-30-93

TO PISMO
BEACH

CDRW-BBK-C

86-23

Pier Avenue
Vegetated Dunes
Area of Grading
(Bare Sand)

Lagoon

Oceano

Arroyo Grande Creek

Highway

One

TO GARDEN LANE

EXHIBIT 5

3-99-024

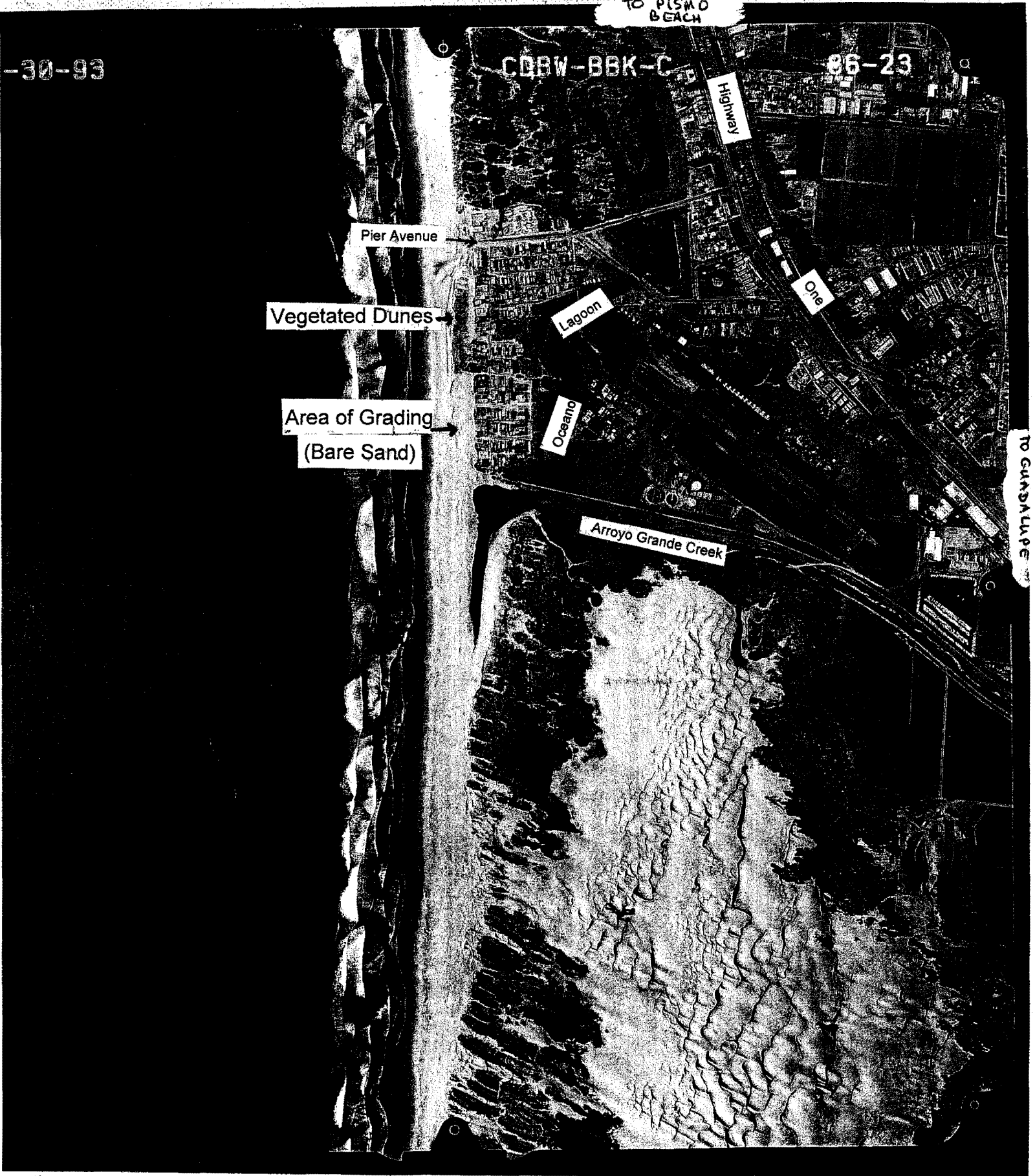


FIGURE 3B

PLATE 2

DUNE COMPLEXES OF THE NIPOMO REGION

