#### CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE 725 FRONT STREET, SUITE 300 SANTA CRUZ, CA 95060 PHONE: (831) 427-4863 FAX: (831) 427-4877 WEB: WWW.COASTAL.CA.GOV



# Th12a

#### Prepared July 9, 2019 for July 11, 2019 Hearing

**To:** Commissioners and Interested Persons

From: Susan Craig, Central Coast District Manager

Kevin Kahn, District Supervisor

Subject: Additional hearing materials for Th12a for CDP 4-82-300 Review (Oceano Dunes State Vehicular Reservation Area)

	ere checked in the boxes below, this package includes additional materials related to the re-referenced hearing item as follows:
	Staff report addendum
X	Additional Agency, Governmental, and Group Correspondence, received in the time since the staff report was distributed
	Additional ex parte disclosures received in the time since the staff report was distributed
	Other

Dayna Bochco, Chairwoman California Coastal Commission 45 Fremont St., #2000 San Francisco, CA 94105-2219

#### Dear Chair Bochco:

As former Coastal Commissioners, we would like to take this opportunity to urge you to seize this singular opportunity to begin the process of transitioning the Oceano Dunes State Vehicular Recreation Area into a different kind of State Park: one that complies with modern environmental laws and principles, provides safe and sustainable coastal access for diverse user groups, protects public health, and celebrates the unique natural resources of the Guadalupe-Nipomo Dunes Complex.

All of us, current commissioners included, have struggled with the intractable morass of the ODSVRA over the decades. We have watched the videos of huge trucks and RVs crashing through the creek. We have seen the annual reports from the US Fish and Wildlife Service on the continuing take of endangered snowy plovers and least terns. We have heard from the local air district that dust from the park is causing the worst air quality *in the nation* on several days of the year. We have read the articles about the dozens of people who have been injured or killed by reckless drivers. And we have listened to the downwind residents, some carrying oxygen tanks, who can't go outside their homes or even open their windows because of the health risks.

We took all this in with a sense of both frustration and futility, as the situation seemed to worsen with each passing review, despite State Parks' best efforts. Frustration because the underlying coastal development permit was intended as an interim solution until a more reasonable proposal could ultimately be incorporated into the San Luis Obispo County LCP. Futility because the Commission's annual review of the permit only gave us a litany of problems, and never any solutions.

But finally, after 37 years of being regulatory by-standers, this Commission has a pathway for positive change. Staff's recommendation to start addressing the immediate concerns through a permit amendment while State Parks prepares a Public Works Plan to transition the park to a more sustainable future is a sound approach that is quite frankly overdue.

We know you are in for a long and contentious day. There have been many such days in the Commission's history: Hearst Ranch, the Toll Road, Sea World, Newport Banning Ranch, the Jonathan Club. But inevitably, when the Commission holds firm and applies the goals and the policies of the Coastal Act, those days are the ones that shape the agency's legacy, and inspire the public's support for the program. We urge you to do what we were not given the option to do. Take immediate action to protect Oceano.

Respectfully submitted for your consideration,

Mel Nutter (served 1997-1985, Chair 1982-1985)

Sara Wan (1996-2011, Chair 1998-2001 & 2010-2011)

Pedro Nava (served 1997-2004)

Trent Orr (served 1997-2004, 2016-2018)

Mike Reilly (served 1998-2009, Chair 2001-2004)

Mary Shallenberger (served 2004-2017, Chair 2010-2012)

Meg Caldwell (served 2004-2007 & 2009-2012, Chair2004-2006)

Jim Wickett (served 2007-2013)

Brian Brennan (served 2011-2014)

Randy Pester (served 2012-2017)

Aaron Peskin (served 2017-2019)

#### CALIFORNIA LEGISLATURE

STATE CAPITOL SACRAMENTO, CALIFORNIA 95814

July 11, 2019

Dayna Bocheo, Chairwoman California Coastal Commission 45 Fremont St., #2000 San Francisco, CA 94105-2219

RE: Oceano Dunes

Dear Chair Bocheo:

As former Coastal Commissioners, we would like to take this opportunity to urge you to seize this singular opportunity to begin the process of transitioning the Oceano Dunes State Vehicular Recreation Area into a different kind of State Park; one that complies with modern environmental laws and principles, provides safe and sustainable coastal access for diverse user groups, protects public health, and celebrates the unique natural resources of the Guadalupe-Nipomo Dunes Complex.

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But finally, after 37 years of being regulatory by-standers, you have a pathway for positive change. Your staff recommendation to start addressing the immediate concerns

through a permit amendment while State Parks prepares a Public Works Plan to transition the park to a more sustainable future is a sound approach that is quite frankly overdue.

We know you are in for a long and contentious day. There have been many such days in the Commission's history: Hearst Ranch, the Toll Road, Sea World, Newport Banning Ranch, the Jonathan Club. But inevitably, when the Commission holds firm and applies the goals and the policies of the Coastal Act, those days are the ones that shape the agency's legacy, and inspire the public's support for the program. We urge you to do what we were not given the option to do. Take immediate action to protect Oceano.

Sincerely,

RICHARD BLOOM

Assemblymember, 50th District

MARK STONE

Assemblymember, 29th District

Cc:

California Coastal Commissioners

Jack Ainsworth - Executive Director, California Coastal Commission Sarah Christie - Legislative Director, California Coastal Commission

## Congress of the United States Washington, DC 20515

July 3, 2019

California Coastal Commission 45 Fremont Street, Suite 2000 San Francisco, California 94105 RECEIVED

Dear Chairwoman Bochco and Coastal Commissioners:

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We are writing today to express concern with the California Coastal Commission staff report recommendations regarding the Oceano Dunes State Vehicular Recreation Area (ODSVRA) Coastal Development Permit that the Commission is scheduled to take up for debate and vote on July 11, 2019.

The ODSVRA is one of nine off-highway vehicle (OHV) areas administered by the California Department of Parks and Recreation as part of the California OHV Program, and it is the only OHV recreation area along our state's coast. It is a very popular location for our constituents and Californians to enjoy a unique OHV recreational experience. In fact, according to the Oceano Dunes District-California State Parks Economic Impact Analysis Report 2016/17, the top activity in the District is all-terrain vehicle recreation at this location. In addition, the report found that the overall economic impact of the ODSVRA is more than \$243 million to the local community and visitors to the ODSVRA generate over 3,300 jobs at local businesses.

It is important to protect our natural resources for future generations to enjoy. However, we believe that conservation and access to public lands for OHV recreational purposes are not mutually exclusive. Public lands should be just that – open and accessible to the public for their enjoyment, including responsible recreational activities.

Unfortunately, the California Coastal Commission staff report recommends, among other things, prohibiting night riding, installing additional fencing, blocking vehicle crossings at Arroyo Grande Creek, and eliminating unlimited OHV use on holidays at the ODSVRA. We are concerned that if implemented, these recommendations would not only deny our constituents and others the ability to fully access their public lands for OHV recreation, but also have significant adverse economic impacts to the local economy.

Accordingly, we respectfully request that the California Coastal Commission not approve any changes to the ODSVRA Coastal Development Permit that would directly or indirectly limit OHV access to the popular and unique Oceano Dunes State Vehicular Recreation Area. Please do not hesitate to contact us if you have any questions.

Thank you for your time and attention to this important matter.

Sincerely,

KEVIN McCARTHY

House Republican Leader

DEVIN NUNES

Member of Congress

STATE CAPITOL P.O. BOX 942849 SACRAMENTO, CA 94249-0034 (916) 319-2034 FAX (916) 319-2134

DISTRICT OFFICE 4550 CAUFORNIA AVENUE, SUITE 740 BAKERSFIELD, CA 93309 (661) 395-2995 FAX (661) 395-3883

EMAIL Assembly:Nember Fong@assembly.ca.gov

Assembly California Tegislature



VINCE FONG ASSEMBLYMEMBER, THIRTY-FOURTH DISTRICT

COMMITTEES VICE CHAIR, THANSPORTATION **APPROPRIATIONS** BUDGET **BUSINESS AND PROFESSIONS** PUBLIC EMPLOYMENT AND RETIREMENT

SUBCOMMITTEES SUDGET SUBCOMMITTEE NO. 3 ON RESOURCES AND TRANSPORTATION. SUDGET SUBCOMMITTEE NO. 6 ON BUDGET PROCESS OVERSLY, AND PROGRAM EVALUATION

July 2, 2018

California Coastal Commission 333 Madonna Rd San Luis Obispo, CA 93405

Re: Oceano Dunes State Vehicular Recreation Area (ODSVRA) CDP Review

To whom it may concern,

I am writing to oppose the recent staff recommended changes for Oceano Dunes State Vehicular Recreation Area set in the staff report for the July 11, 2019 California Coastal Commission meeting. The decision being considered will drastically change the economic and recreational landscape of Southern San Luis Obispo County and reduce an outdoor feature which provides a positive quality of life for thousands of California residents.

Since the 1980's Oceano Dunes has been a recreational destination for thousands each year, many of whom reside in Kern County, Oceano Dunes covers approximately 3,600 acres, whereas less that half (1500 acres) of that is used for off-highway vehicles (OHV). This is the only state park where OHV is allowed on the beach, a feature California should be highlighting.

I have major concerns about the implications of the actions set forth in the California Coastal Commission staff report. OHV is a recreational benefit to Californians and provides revenues that help San Luis Obispo County thrive. Reducing these parks and OHV activities is a threat to safe, enjoyable recreation and a sustainable economy.

I respectfully request that the commission take these comments into consideration. If you have any questions please do not hesitate to reach out to my office (661) 395-2995.

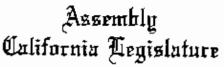
Sincerely,

Vince Fong

Assemblyman 34th District

STATE CAPITOL PO. BOX 942849 SACRAMENTO, CA 94249-0005 (916) 319-2035 FAX (916) 319 21:35

DISTRICT OFFICE 444 HIGUERA STREET, SUITE 100 SAN LUIS OBISPO, CA 93401 (805) 549-3381 FAX (805) 549-3400





JORDAN CUNNINGHAM ASSEMBLYMEMBER, THERTY-FIFTH DISTRICT

COMMITTEES
CO-CHAIR, ETHICS
VICE CHAIR JOBS, ECONOMIC
DEVELOPMENT, AND THE ECONOMY
VICE CHAIR: RULES
AGRICULTURE
BUSINESS AND PROFESSIONS
TRANSPORTATION
UTILITIES AND ENERGY

SELECT COMMITTEES
CAREER TECHNICAL EDUCATION
AND BUILDING A 21<sup>st</sup> CENTURY
WORKFORCE
CENSUS
CYBERSECURITY

## RECEIVED

July 3, 2019

JUL 05 2019

The Honorable Dayna Bochco Chair, California Coastal Commission 45 Fremont Street, Suite 2000 San Francisco, CA 94105

RE: July 11 Coastal Commission Meeting, Agenda Item 12a: Oceano Dunes State Vehicular Recreation Area (ODSVRA) CDP Review

SENT VIA US MAIL & EMAIL

Dear Chair Bochco:

i represent the 35<sup>th</sup> Assembly District, which includes the Oceano Dunes State Vehicular Recreation Area.

I write today in opposition to the California State Coastal Commission staff's proposal to further limit off-road vehicle access to the dunes and state park.

In 2017, visitors to San Luis Obispo County spent more than \$1.6 billion, helping to generate nearly \$80 million in local tax revenue. Tourism is second only to agriculture in terms of economic impact for San Luis Obispo County. Our local businesses depend upon tourism to stay afloat and create jobs, and our local governments depend upon it to fund critical public services like police and fire protection.

The Oceano Dunes State Vehicular Recreation Area itself generates more than \$150 million in annual economic activity from outside visitors. It is a major contributor to South San Luís Obispo County's tourism industry. Hundreds of businesses rely upon these visitors to generate revenue and employ local residents.

These businesses would see a loss of economic activity if this Commission imposes further limitations on off-road vehicles, and our county would see a loss of tax revenue.

In addition to the economic benefits, the Dunes provide unique access to recreation for off-road vehicles. We have made progress in mitigating the environmental impacts of OHV's, as well as improving public safety at the Dunes. I believe that we will make further progress in those areas.

Lastly, I am disappointed that the Commission is considering making such a large decision just a week after independence Day, and is closing the public comment period the day after the national holiday. The public deserves adequate opportunity to voice their opinion about further limiting access to the Dunes.

In sum, the Oceano Dunes provides a major economic benefit to local businesses, cities, and counties, and provides access to coastal recreation for millions of Californians. Please do not further limit access to one of our state's coastal treasures.

Sincerely,

Assemblyman Jordan Cunningham

35th District



#### COUNTY OF SAN LUIS OBISPO BOARD OF SUPERVISORS

Debble Arnold District Five Supervisor

July 5, 2019

The Honorable Dayna Bochco Chair, California Coastal Commission 45 Fremont Street, Suite 2000 San Francisco, CA 94105

Re: July 11 Coastal Commission Meeting, Agenda Item 12a: Oceano Dunes State Vehicular Recreation Area (ODSVRA) CDP Review

Dear Chair Bochco:

As a member of the San Luis Obispo County Board of Supervisors, I am writing to express my opposition to any decision by the California Coastal Commission to restrict or eliminate OHV use on the Oceano Dunes State Vehicular Recreation Area (ODSVRA).

The ODSVRA has historically allowed the use of vehicles on the dunes and it has become a very popular destination for many California families.

It has been estimated by State Parks that the ODSVRA is responsible for approximately \$243 million dollars of economic activity annually. The elimination of the recreational opportunities the park presently provides will create a severe economic hardship for San Luis Obispo County.

Millions of California citizens approve of and engage in the use of vehicles at the ODSVRA. State Parks has been successfully working to address environmental concerns while continuing to allow for historical uses in the park.

I urge you to reconsider any restrictions to the current recreational uses at the ODSVRA at this time.

Sincerely,

Debbie Arnold 5<sup>th</sup> District Supervisor San Luis Obispo County



## City of Grover Beach

Mayor Jeff Lee Mayor Pro Tem Mariam Shah
Council Member Karen Bright, Council Member Desi Lance, Council Member Barbata Nicolls

Matthew Bronson City Manager

July 5, 2019

RECEIVED

California Coastal Commission 45 Fremont, Suite 2000 San Francisco, CA 94105-2219

Dear Honorable Commissioners:

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This letter serves to provide a summary of concerns and interests from the Grover Beach City Council on the topic of the Oceano Dunes State Vehicular Recreation Area (ODSVRA) Coastal Development Permit. We appreciate the Commission's time in considering these comments as the Commission reviews the permit for this important recreational and environmental coastal asset in our region.

The City of Grover Beach is located adjacent to both the ODSVRA and Pismo State Beach and contains one of two entry points to the recreation area, the "front porch" entrance at the end of Grand Avenue. We are a community with approximately 14,000 residents along with thriving local businesses many of which cater to the visitors who travel to the ODSVRA and Pismo State Beach. Our business community has expressed concerns about the potential economic impacts from eliminating off-highway vehicle (OHV) usage at the ODSVRA. According to a study by California State Parks in 2016, direct spending by ODSVRA and Pismo State Beach users outside of San Luis Obispo County equaled \$158 million with the overall annual economic impact estimated to be \$243 million. This impact includes thousands of local jobs that are directly or indirectly tied to the ODSVRA and Pismo State Beach. Our City Council is also concerned that significantly reducing or eliminating the OHV usage would likely reduce the number of visitors and have significant impacts on our local economy as the region adapts to the economic loss from the impending closure of the Diablo Canyon Power Plant.

At the same time, our City Council is sensitive to the environmental issues raised by Coastal Commission staff and tied to the Commission's review of this permit. These issues include air quality concerns, coastal resource protections, environmental justice considerations, and other items that have been long identified in our area as issues to address. Ensuring a high quality of life in our city and area means ensuring both a strong economy and sustainable environment for our residents and businesses today and for future generations. To this end, we support the ongoing work of California State Parks and the San Luis Obispo County Air Pollution Control District in developing practical solutions that balance recreational access along with reasonable limitations that protect our environment. These solutions, which could include onsite and offsite mitigations, are being forged in the interest of finding a compromise that maintains the vitality and visitor attraction of the ODSVRA and Pismo State Beach while mitigating potential environmental impacts.

154 South Eighth Street & Grover Beach, California 93433 & FAX (805) 489-9657 \* www.groverbeach.org

Through our positive interactions with both Coastal Commissioners and staff over many years, we are confident that the Commission will determine a path forward that achieves the goals of the Coastal Act at the Oceano Dunes Vehicular Recreation Area in a way that also protects our local economy. The City of Grover Beach will be engaged in this effort and looks forward to working constructively with all stakeholders before any final decisions about access are made by the Commission.

Thank you for your consideration of these concerns and interests on behalf of the City of Grover Beach.

. XX ...

City of Grover Beach





















July 8, 2019

California Coastal Commission

## RE: Oceano Dunes State Vehicular Recreation Area Coastal Development Permit 482-300 Review Area

Dear California Coastal Commissioners,

On behalf of the undersigned organizations, we are writing in strong support of the recommendations directed at reducing the significant adverse effects of Off-Highway Vehicle (OHV) use on public health and natural resources within and around the Oceano Dunes State Vehicular Recreation Area (Oceano Dunes SVRA), as detailed in the California Coastal Commission (Commission) staff's June 21, 2019, report prepared for the July 11, 2019, Commission hearing. The report comes as a result of the effects of high-intensity OHV use within this area and related impacts to air quality, public health, rare and endangered species habitats, and local communities. As written, Coastal Commission staff are recommending changes to the Oceano Dunes SVRA permit, including prohibition of night riding, increased enforcement, additional fencing and other conditions.

#### Improving Protections for Rare and Endangered Species

Oceano Dunes SVRA is a Coastal Commission-designated environmentally sensitive habitat area and is part of a larger significant ecological system (the Guadalupe Nipomo dunes complex) that has been identified as critical habitat for the threatened Western snowy plover and other sensitive and listed species including the California least tern, Steelhead trout, and Tidewater goby. Unfortunately, under the current permit, habitat for these species is located within approved vehicular riding areas that has led to multiple and continued instances of take (i.e., death of individual species and habitat destruction), which are violations of section 9 of the Federal Endangered Species Act (ESA). Additional adverse impacts occur as vehicles cross the Arroyo Grande Creek to access riding and camping areas. While the creek does not flow year-round, when it does, it provides habitat for protected California red-legged frog, Steelhead trout and Tidewater goby. Vehicle crossings cause erosion of banks, shallowing of critical spawning habitat and overall degrade degradation of creek health. Despite current periodic crossing prohibitions and guidelines, there is documentation of consistent violations. Of additional concern is the Department of Parks and Recreation's (DPR) nearly twenty-year delay in completing the required Habitat Conservation Plan for the Oceano Dunes SVRA. Given the impacts on protected and imperiled species and the delay in completing a conservation plan/permit to comply with the federal ESA, the Coastal Commission recommended changes to its permit are essential for improved species protections, including:

- Year-round closure of vegetated dune and snowy plover breeding areas
- Prohibition of the Arroyo Grande Creek when flowing
- Prohibition of night riding (as night noise and light can be extremely detrimental to the listed species)

- Making the 300-acre seasonal endangered species enclosure area permanent and restore the area to enhance habitat
- Increased operational enforcement, which would ensure fencing boundaries and creek crossing guidelines are followed by Oceano Dunes SVRA visitors

#### Better Protections for the Surrounding Community's Public Health

Dust emissions associated with OHV use within the Oceano Dunes SVRA are resulting in inland air quality problems, which often exceed State and Federal ambient air quality standards for particulate matter. These high particulate matter concentrations have resulted in what the San Luis Obispo County Air Pollution Control District has deemed a "significant and ongoing public health threat" for the people living inland of this area, which has resulted in disproportionate public health impacts to a lower income population. Given the Commission's recent Environmental Justice Policy and Tribal Consultation commitments, it is important for the Commission to support the staff recommendations regarding dust abatement efforts as well as an outreach program targeting low-income communities. These recommendations are important first steps in addressing the disproportionate impacts to nearby lower income communities.

In summary, the recommendations put forth in the staff report would allow for more responsible coastal resource and species management within the Oceano Dunes SVRA, as well as make this area a safer and healthier destination for visitors and surrounding communities.

For the reasons discussed above, we strongly support the recommendations in the June 21, 2019, Coastal Commission staff report and urge the Commission to approve recommended conditions to the Oceano Dunes SVRA Permit 482-300.

#### Sincerely,

Kim Delfino Diana Vazquez California Program Director Policy Manager

Defenders of Wildlife California Environmental Justice Alliance

Juan Altamirano Lucas Zucker

Associate Director of Public Policy Policy and Communications Director

Audubon California Central Coast Alliance United for a Sustainable Economy

Kathryn Phillips Cea Higgins
Director Executive Director

Sierra Club California Coastal Trail Association

Jennifer Savage Rico Mastrodonato

California Policy Manager Government Affairs Director Surfrider Foundation The Trust for Public Land

Jay Ziegler Dan Jacobson Director, External Affairs & Policy State Director

The Nature Conservancy Environment California

CC: California Coastal Commission Staff

A Native American Corporation - NorthernChumash.org 1590 18<sup>th</sup> Street Los Osos, PO Box 6533, CA 93412 805-801-0347

California Coastal Commissioners Dan Carl, Central Coast Director Susan Craig, Central Coast Manager Kevin Kahn, Central Coast Supervisor June 28, 2019

Re: Oceano Dunes State Vehicular Recreations Area Coastal development Permit 4-82-300 Review

Dear Commissioners and Staff,

It was just yesterday that the Northern Chumash Tribal Council, Inc. wrote our comments to you and your staff, concerning the above referenced review and today we have another major tragedy to report to you.

With great sorrow our indigenous Chumash Community sends our sincere condolences to the Shawn Josef Imlig, 37, family and relatives for their senseless loss. The Chumash Community remembers the pain, pain of bad decisions, in 1849 the US government imposed a .25 scalp fee for Chumash Peoples, pain of being forgotten, pain of watching our Sacred Dunes be used as a killing field, pain and frustration of watching human beings being slaughtered by bad decisions. When is enough, enough.

For the Northern Chumash Peoples we are experiencing a horror story, we are being burdened and discriminated against through poor decision making, decision that have never taken the Northern Chumash People into consideration before make this mammoth string of horror-able decision to have a death trap on Sacred and Ceremonial Indigenous Peoples Lands, lands of our Ancestors, over 15,000 years.

We feel the pain today, we feel the pain from yesterday, and we want this Commission to make the decision so we do not FEEL THE PAIN IN THE FUTURE, help us stop the Genocide.

The list of human beings that we sent yesterday, is only a partial list, we estimate that more than 80 people have died and over a 1000 incidents have resulted in serious debilitating injuries, how, can this kind of pain, be authorized.

Commissioner's we pray that you can look inside your heart and feel the compassion of life for all, make the decision for all, and that includes the First Peoples. Our pain runs deeper that all others, when will it STOP.

Sincerely,

The Elders Council
Northern Chumash Tribal Council, Inc.

ENVIRONMENTAL & LAND-USE CONSULTING
EDUCATIONAL SERVICES TEACHING NATURE, NATIVE CULTURES &
FARMING



July 1, 2019

To: OceanoDunesReview@coastal.ca.gov

Re: Public Comment on July 2019 Agenda Item Thursday 12a - Oceano Dunes State Vehicular Recreation Area (ODSVRA) CDP Review

The Dunes Alliance is a coalition of community and environmental organizations active on the Central California coast. We support the recommendations of Coastal Commission staff regarding the management and future of the Oceano Dunes State Vehicular Recreation Area.

Sincerely,

Andrew Christie, Director Herbert Smith, Board Member American Woodland Conservancy Sierra Club Santa Lucia Chapter Brad Snook, Chair Cynthia Replogle, President Oceano Beach Community Association Surfrider San Luis Obispo Frid (dlins Fred Collins, Tribal Administrator Jeff Miller, Senior Conservation Advocate Northern Chumash Tribal Council Center for Biological Diversity Doug Tait Kara Woodruff, Representative Doug Tait, Conservation Chair Friends of Oso Flaco Lake Morro Coast Audubon OccuSioned by: Gordon & Husley Hary Ciesiaski Gordon Hensley, Executive Director Mary Ciesinski, Executive Director San Luis Obispo Coastkeeper **ECOSLO** 



















Pratish Patel Associate Professor Orfalea College of Business California Polytechnic State University San Luis Obispo, CA 93407

Re: Oceano Dunes District-California State Parks Economic Impact Analysis Report 2016/17 Prepared by SMG Consulting

Dear members of the commission,

My name is Pratish Patel; I am in charge of the real estate program at Cal Poly. I received my doctorate from the University of California at Berkeley in 2013 and am an Associate Professor at Cal Poly. My research concerns finance, urban economics and affordable housing. I have published my research in leading academic journals. For your reference, I attach my CV at the end of this letter. This letter concerns the SMG Consulting's (SMG) Economic Impact Analysis report (referred as the Report). <sup>1</sup>

The main point of the letter is simple: the Report does not pass the "sniff test". I show that the assumptions underlying both the survey and the economic impact are dubious. I ask that you seek an independent academic to conduct a peer review of the report.

To be clear, writing an economic impact report is tough. A mathematical model underlies any economic analysis, and that model needs to be calibrated with parameters and one needs to make simplifying assumptions. SMG consulting, for example, used the model developed by IMPLAN. Because of the need for assumptions, it is critical to follow certain "best practices" and great care must be taken to interpret the impact. SMG ignored these practices. Careless Report language causes misinterpretation of the economic implications.

For clarity of exposition, my critique only spans the economic impact and not jobs as the latter depends on the former. In the Report, SMG claims that the economic impact of the Oceano Dunes District (referred as the District) to the San Luis Obispo County is \$243 million. But, the Report does not explain the method. In fact, the IMPLAN model assumptions are not highlighted anywhere in the

<sup>&</sup>lt;sup>1</sup> I have neither been paid, nor do I expect to get paid for this letter. My career does not depend on the letter either. I only have one motive: I care about the Oceano residents and want them to get their fair share.

report. As a result, my discussion relies on what I believe are the two parameters that underlie the Report.

Loosely speaking, the Report uses the fact that between 2016 and 2017, attendance to the District was 2.2 million visitors. Based on a survey, SMG found that about 15% of the visitors were local and on average a travel party comprising 11 members spent \$1,389 on a typical trip. The report relies on two parameters: number of visitors of 2.2 mm and party expenditure of \$1,389. Then, the impact is \$236 MM  $(2.2 \times 10^6 \times (1-0.15)/11 \times 1,389)$ . (The discrepancy between the \$236 and \$243 million is related to the multipliers used by the IMPLAN software.) I divide my critique in two parts: the first part concerns the two parameters underlying the method and the second part concerns the survey sampling.

#### Part 1: Critique of the methodology

- Number of visitors: The number 2.2 million visitors do not mean that these are unique visitors. Consider, for example, a typical party of 11 members spending three days in the District. If each member of the party goes to the Pismo State Beach every day, then it will be counted as 33 visits. But triple counting such visits exaggerates the economic impact.
- <u>Day Versus Overnight visitors:</u> The report claims that 12% of the visitors to the District
  were there for only one day. That is, these visitors did not stay overnight in the District.
  Then, it is unreasonable to think they would spend \$1,389 (which includes
  accommodation)
- Expenditure: SMG's survey asked about different categories of expenditures made by the visitors. These categories include: lodging, day use fees, food, transportation, retail, recreational activities, and other expenses. Consider for the moment the category of recreational activities which includes rentals. SMG assumed that all visitors rent from the District shops. This assumption is, categorically, false. Clawson Motorsports (Newspaper article), based in Fresno, purports to fill meetings pleading to keep the dunes open for vehicular access. A product specialist named Lex Henderson claims "If the dunes close, it would have a major impact on us. I would say that 75% of the recreational vehicles go there..." Clawson Motorsports presence, itself, implies that the dunes visitors do not rent from the District. A similar line of argument applies to all the categories.

<sup>&</sup>lt;sup>2</sup> The Report carelessness is readily seen on the last page (page 46). SMG double counts visitors for the month of July. That is, the number of visitors are inflated by about 290 K because of double counting.

- <u>Costs:</u> SMG only reports the expenditures, it does not account for the costs. For example, SMG does not account for negative externalities like pollution that are paid by the Oceano residents. Several accidents and even deaths have taken place, and the Report remains silent on that issue.
- Interpretation: The question before the commission is to weigh the benefits and costs of allowing vehicles on the dunes. Most citizens interpret the economic impact to be the benefit but that interpretation is incorrect. The impact also includes Monarch butterflies and Pismo State Beach. A true analysis would seek to determine the net economic impact of OHV visitors to the park. The SMG analysis looks only at revenues while omitting costs. It also inflates revenues by factoring in non-OHV visitors at Pismo State Beach and the Monarch Butterfly Grove.

To summarize, SMG consulting uses an exaggerated number of visitors. SMG consulting also exaggerates the expenditure spent in the District. After accounting for daily visitors and after making reasonable assumptions about the expenditures attributed to the District, I believe that the economic impact reduces by at least half. If one restricts access to the dunes, the impact will be less. In fact, the net benefit may be positive since the Report did not include the costs related to pollution and accidents.

#### Part 2: Critique of the sampling

Use of a survey is fraught with caveats. This is clear from the election poll volatility for example. A survey depends on framing; it depends on "random sampling", it assumes that participants report facts truthfully and it assumes that participants do not change their answers based on the impact of their answers. The survey in the Report suffers from critical flaws.

- Framing: To conduct the survey, SMG asked visitors to complete the survey at District entrance. Consider, for example, asking someone about to ride vehicles on the beach about "what happens if they could not ride". Relatedly, consider asking the prior question after showing pictures of the pollution toll on Oceano residents and accidents. The answers will change. SMG, fundamentally, misjudges the framing issue.
- Random Sampling: A fair survey needs to account for selection bias. Only asking visitors about their experience at the dunes biases the survey results. This is akin to asking only republicans about their view of Trump. SMG deviates from a prior economic impact report that sampled randomly and does not give the cause of the deviation in the Report.

• Question: The main question is to weigh the benefits and costs of vehicular access on the dunes.

SMG did not ask such a question. Instead, they asked:

If Oceano Dunes was not in existence (no OHV riding, <u>no camping, no trails, etc.)</u> when you were considering a visit to the area, would you still have visited San Luis Obispo County?

Note that the asked question differs from the intended question. Presumably, SMG asked this question because they want to understand the District impact on the county. Well, this is not the appropriate question. Anyone visiting the dunes cares about the beach and Californians love hiking. No one is suggesting to close those aspects of the dunes.

#### **Summary**

To conclude, after a careful analysis, the economic impact of \$243 million does not pass the "sniff test". The impact ignores the permanent costs suffered by the Oceano residents. The survey is also biased and not performed in good faith: it does not ask the basic question. I ask that an independent academic peer review the Report. I also ask that SMG publicly disclose the survey data.

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**Pratish Patel** 

#### Pratish A. Patel

Contact Department of Finance Voice: (805) 756-1416 Information Orfalea College of Business E-mail: ppatel29@calpoly.edu California Polytechnic State University Webpage: http://www.calpoly.edu/ppatel29/ San Luis Obispo, CA 93407, USA **EDUCATION** Ph.D. Real Estate Finance University of California at Berkeley, Berkeley, California USA 2013 M.S. Financial Engineering University of California at Berkeley, Berkeley, California USA 2005 **B.S.** Chemical Engineering Georgia Institute of Technology, Atlanta, Georgia USA 2002 DISSERTATION Essays in technology adoption and corporate finance 2013 Chair: Willie Fuchs and Nancy Wallace FIELDS OF INTEREST Real estate and finance, Corporate finance, Asset Pricing, Portfolio Management and Real Options ACADEMIC EMPLOYMENT California Polytechnic State University., San Luis Obispo, California USA Associate Professor (without tenure) 2017 — present California Polytechnic State University., San Luis Obispo, California USA Assistant Professor (Joint Appointment in Economics and Finance) 2013 - 2017Published or FORTHCOMING Time Aggregation of Sharpe Ratio — A better extrapolation rule Papers with Ziemowit Bednarek and Cyrus Ramezani, Forthcoming in the Journal of Investment Management Journal List Ranking — C 2018 Understanding the out performance of the minimum variance portfolio with Ziemowit Bednarek, Finance Research Letters Journal List Ranking — B 2017 Rent-to-own Housing Contracts under financial constraints with Sanjiv Jaggia, Journal of Derivatives Journal List Ranking — A 2017 Effect of booms or disasters on the Sharpe Ratio

with Ziemowit Bednarek, Journal of Portfolio Management

2017

Journal List Ranking — A

	A Strong Case to calculate the Treynor Ratio using log-returns with Ziemowit Bednarek and Alex Firsov, The Journal of Asset Management Journal List Ranking — B	2017
	Time aggregation of the Sharpe ratio with Ziemowit Bednarek and Cyrus Ramezani , The Journal of Asset Managem Journal List Ranking — B	nent <b>2016</b>
	Moral Hazard with the (Unlikely) Possibility of Catastrophes with Ziemowit Bednarek, Economics Letters  Journal List Ranking — A	2016
Papers Under Review	What does bet againt beta mean in a multi-factor world? with Ziemowit Bednarek and Brian Ayash, Under review at the Journal of Investment Management	2010
	Journal List Ranking — C  The Price of Tax Credits Under Policy Uncertainty: Evidence from the Low-Income Housing Tax Credit with Bree Lang,  Under review at the AEJ Policy  Journal List Ranking — A	2018
	Downpayment Assistance and Mortgage Rates with Bree Lang and Ellen Hurst Under review at the Review of Financial Studies  Journal List Ranking — A	2018
Working Papers		
	How smart is your smart beta portfolio with Ziemowit Bednarek and Brian Aya.	sh
	The Adoption of New Technologies: Location, Learning and Asset Pricing Implications with $Ziemowit\ Bednarek$	
	Form Follows Finance with Robert Helsley	
	Stochastic Dominance and Leveraged ETF Performance with Ziemowit Bednarek	ů
RESEARCH PRESENTATIONS	Eastern Finance Association	2019
	Western Economic Association International conference	2017
	Global Finance Conference	2016
	Global Real Estate Summit, Southern Finance Association	2015
	California Polytechnic State University	2013
	California Polytechnic State University  California Polytechnic State University, Baruch College, University of Amsterdar University of Georgia, National University of Singapore	
	Haas School of Business	2010 — 2012

	London School of Business	2011
PROFESSIONAL		
EMPLOYMENT	<b>Optiopt INC.</b> , San Francisco, California USA $Founder$	2006 — 2008
	<b>Duff &amp; Phelps L.L.C.</b> , San Francisco, California USA Senior Associate	2005 - 2007
	<b>Progress Energy.</b> , Raleigh, North Carolina USA Associate	2002 - 2004
Honors and		
Awards	Orfalea Grant	2014 - 2017
	RSCA Grant	2014
	Graduate Student Grant, Fischer Center Grant	2012 - 2013
	Hope scholarship, Robert P. Dodd scholarship, Davis P & P scholarship	2000 - 2001
	First Place in raquetball intramurals at Georgia Tech	2001

Gold medal in biology at Georgia state level science olympiad

 $\boldsymbol{1998}$ 





July 4, 2019

To: California Coastal Commission

Via: Email: OceanoDunesReview@coastal.ca.gov

Subject: Coastal Development Permit for the Oceano Dunes State Vehicular Recreation Area

Dear California Coastal Commissioners, Director Ainsworth, and Staff:

On behalf of Audubon California, a state office of the National Audubon Society and it's 300,000 members and supporters, and the Morro Coast Audubon Society (MCAS), part of a national and statewide network of the National Audubon Society, we appreciate this opportunity to provide written comment on the Oceano Dunes State Vehicular Recreation Area Coastal Development Permit 4-82-300 Review.

MCAS is also a proud member of the Dunes Alliance, a coalition of Central California coastal community and environmental groups formed to present a unified vision for the Oceano Dunes State Vehicular Recreation Area (ODSVRA). MCAS supports the June 20, 2019 Dunes Alliance letter to the Coastal Commission.

In short, MCAS fully supports the Coastal Commission's staff recommendations in their Coastal Development Review, and that any future use of the ODSVRA must be consistent with federal and state law including the San Luis Obispo County Local Coastal Program (LCP).

#### Uniqueness of the ODSVRA and Dunes Complex

Prior to addressing our specific concerns, MCAS would like to remind the Commission that the entire Guadalupe-Nipomo Dunes Complex is a unique ecological gem that is critical habitat to hundreds of coastal species and provides protection for 63 federal and state listed species.

Although State Parks have implemented a variety of sensitive species management techniques, these have not been enough to ensure that these rare species and habitats are given the protections that are required under State and Federal law.

OHV use at the Park has continued to cause harm to, and death of, Endangered Species Act protected species - which is illegal "take" of these species under State and Federal law. This continued and ongoing take, which is prohibited under the Endangered Species Act, should concern us all.

It is disturbing that CA State Parks has been operating the Park, for many years, without completion of a comprehensive resource monitoring program such as a Habitat Conservation Plan (HCP), pursuant to the Endangered Species Act. The measures taken by State Parks intended to avoid impacting federally listed species is commendable, however their measures are not adequate to fully avoid "take" and thus violations of the Federal Endangered Species Act continue to occur at ODSVRA.

A species and habitat issue that hits close to home for the residents of San Luis Obispo County comes from "Pacific Wildlife Care", operating from Morro Bay, CA. Pacific Wildlife Care (PWC) receives hundreds of birds from the ODSVRA every year, many of whom have serious fractures or injuries from being struck by vehicles on the beach.

Between September 11 and October 12, 2018, PWC received four California gulls from the ODSVRA who had been shot with 4 ½ inch long metal blow-gun darts. Reports from ODSVRA staff indicated that there were additional birds with darts in them that were unable to be rescued. (PWC Volunteer e-newsletter Nov. 2018).

#### Access and Use

We applaud the Commission's policy that encourages public access and recreation for all and commend State Park's recent efforts to improve public access and passive recreation for community residents and visitors. However, the high intensity recreation that currently takes place at the ODSVRA is not only impacting the region's biological resources, but it is also diminishing the current passive recreational experiences of hiking, picnicking, bird watching, environmental education, and nature study that many people enjoy. It seems when a more active, intense recreational use is in the mix, all other passive recreational opportunities suffer.

While both passive and active recreation provide some shared benefits like local economic development, passive recreational opportunities may also offer the unique benefits of the protection of natural resources and the restoration of ecosystem services.

It is important to note that the Coastal Act's provision of public access and recreational activities must be consistent with protecting natural resource areas from overuse and must take into account the fragility of the natural resource.

#### Conclusion

We sincerely thank the Coastal Commission Staff for their excellent and thorough analysis of the issues that render the status quo of the Oceano Dunes State Vehicular Recreation Area incompatible with both State and Federal law.

It is evident to us that the issues and constraints that collectively affect the ODSVRA make it clear that State Parks cannot continue to operate as it has in the past without significant changes.

State Park's stated goals are to "obtain and manage for Coastal Act compliance and to manage the Park consistent with State and Federal resource protections." We strongly urge the Coastal Commission to advise State Parks to live up to those words – and urge the Commission to vote YES to approve and adopt the changes to CDP 4-82-300 as set forth in Staff Recommendation.

Thank you for your thoughtful consideration.

Sincerely,

Douglas W. Tait

Douglas Tait

Morro Coast Audubon Society Conservation Chair

Andrea L. Jones

Audubon California

Cidua Ifrea

Director of Bird Conservation



American Woodland Conservancy 1241 Johnson Avenue # 280 San Luis Obispo, CA 93401 [a 501(c)(4) conservation organization] americanwoodlandconservancy@gmail.com

July 2, 2019

TO:

California Coastal Commission

Via: Email:

OceanoDunesReview@coastal.ca.gov

Subject:

Item 12A on Thursday, July 11, 2019

Oceano Dunes SVRA

Dear California Coastal Commissioners, Director Ainsworth, and Staff:

Thank you sincerely for visiting San Luis Obispo and considering State Parks' compliance with its coastal development permit at the ODSVRA. We begin by saying that we wholeheartedly and enthusiastically support the Staff Recommendations. We applied the Commission for its thorough analysis of the multitude of issues that render the status quo at the ODSVRA incompatible with both federal and state law (including the Local Coastal Program) as well as the well-being of the residents and resources of the Central Coast.

Before addressing our specific concerns with the ODSVRA, we wanted to take a moment to remind the Commission about why this matters so much: the Guadalupe-Nipomo Dunes — stretching over 18 miles and 15,000 acres —is really quite special! Undisturbed dune and beach complexes once extended along much of California's coast. Today, only a handful of the thirteen major coastal dune systems are still intact. Among those remaining dunes, the Guadalupe-Nipomo Dunes are especially significant, given their size, species richness, and levels of endemism. Unique species associated with the dunes include the California least tern, western snowy plover, and over twenty special-status plant species including La Graciosa thistle, Nipomo Mesa lupine, surf thistle, and beach spectaclepod. Associated with the dunes ecosystem are wetlands, oak woodlands, coastal stage and associated endangered plant species of Black Lake

We are also concerned about San Luis Obispo County's La Grande Tract. As the staff report explains in detail, the Tract is part of the active OHV riding area, and yet the Commission certified Local Coastal Program (LCP) calls for its use specifically as a "natural buffer area." This issue was litigated in 2008 and the court refused to repeal the LCP's prohibition of riding on the Tract. However, the court declined to take action until a triggering event had occurred. Interestingly, State Parks' recent release of its Public Works Plan (PWP) is just the type of triggering event anticipated by the court. Thus, we ask the Coastal Commission to enforce the LCP at this time, and once and for all hold State Parks in compliance with the LCP.

Speaking of the State Parks' Public Works Plan, it raises another element of grave concern to AWC and its followers, as well as members of the local community; that is, Oso Flaco Lake Natural Area. We were horrified to learn of State Parks' plan to develop this serene natural area of high biological value as new entrance to the OHV rising area. This would negatively impact the beauty and serenity of the region, destroy ESHAs, convert prime agriculture, further undermine air quality in the region, and be contrary to the Coastal Act, including new environmental justice policies. It's an outrageous plan, and broadly opposed by the residents of and visitors to the Central Coast. We ask the Coastal Commission to prevent this ecological calamity and stop the ODSVRA from expanding one inch beyond its current boundary in the Oso Flaco Lake Natural Area.

There are many other concerns with the ODSVRA but we ask that, at a minimum, the Coastal Commission ensure that State Parks be required to abide by federal and state law in the operation of the ODSVRA – particularly State Health and Safety Codes that govern air quality, the Endangered Species Act that protects critical species, and the Coastal Act which mandates compliance with certified LCPs and protection of ESHAs.

in short, we ask you to vote YES on July 11 for the changes to Coastal Development Permit 4-82-300 as amended as set forth in the Staff Recommendation.

We also ask for your help in ensuring the protection of the beautiful Oso Flaco Lake Natural Area, which would be forever changed and ecologically undermined by State Parks' ill-conceived PWP proposal.

Thank you for your thoughtful consideration.

Sincerely,

Herbert B. Smith



## **SLO County APCD Comments on CDP 4-82-300 Review**

### **General Air Quality Related Comments**

The San Luis Obispo County Air Pollution Control District (APCD or the District) has reviewed the staff report for review of Coastal Development Permit (CDP) 4-82-300 for the Oceano Dunes State Vehicular Recreation Area (ODSVRA). The District supports proposed Special Condition 13, "Authorize Dust Control Areas," and urges the Commission to adopt this amendment to CDP 4-82-300 at its July 11<sup>th</sup> meeting.

As noted in the staff report, "ODSVRA vehicular activities have been and are resulting in a significant and continuing public health air quality hazard in the area inland of ODSVRA, notwithstanding measures taken to date to combat these issues, and it appears clear that Park operations must be adjusted for this reason, **including in the very short term (as in the next few months)** [emphasis added]." The District concurs. While we believe the dust control projects completed in 2018 have begun to mitigate the problem, they are not enough: as of July 2, the state PM<sub>10</sub> standard as already been exceeded on 17 days on the Nipomo Mesa.

In addition to the public health impact, there are also legal issues which require immediate action. Specifically, OHMVR was issued a Stipulated Order of Abatement (SOA) in May 2018 by District's Hearing Board.<sup>2</sup> SOA Condition 2.d requires OHMVR to submit to the District by August 1 of this year, its first Annual Report and Work Plan, which among other requirements "shall propose dust control activities to be undertaken or completed in the next year." The SOA anticipated that proposed dust control activities would likely require a new or updated environmental impact report (EIR), and OHMVR has already started the IR scoping process as required by California Environmental Quality Act (CEQA).<sup>3</sup> SOA Condition 4.l.iii additionally requires that before the Annual Report and Work Plan is

<sup>&</sup>lt;sup>1</sup> For details, see "SLO County APCD's Preliminary Review Letter" of OMHVR's February 21, 2019 Version of the Oceano Dunes SVRA Concept Draft Particulate Matter Reduction Plan, available on the District's website at <a href="https://storage.googleapis.com/slocleanair-">https://storage.googleapis.com/slocleanair-</a>

 $<sup>\</sup>frac{org/images/cms/upload/files/Feb\%2025\%202019\%20APCD\%20Response\%20to\%20SP-Feb\%201\%202019\%20PMRP\%20\%28Signed\%29\%20\%281\%29.pdf.$ 

<sup>&</sup>lt;sup>2</sup> Hearing Board of the San Luis Obispo County Air Pollution Control District "Case No. 17-01 Stipulated Order of Abatement". Online at <a href="https://storage.googleapis.com/slocleanair-">https://storage.googleapis.com/slocleanair-</a>

org/images/cms/upload/files/Filed%20%26%20Approved%20SOA%20Case%2017-01%20Apr-30-18.pdf

<sup>&</sup>lt;sup>3</sup> OHMVR published a Notice of Preparation of a Subsequent EIR and Public Scoping Meeting on June 17. The public scoping meeting was held on July 2, and comments are due July 17. The notice is available online at <a href="http://ohv.parks.ca.gov/pages/1170/files/Signed%20NOP-06172019.pdf">http://ohv.parks.ca.gov/pages/1170/files/Signed%20NOP-06172019.pdf</a>.

implemented, it must be approved by the Coastal Commission. All of which is to say the SOA committed the parties to an aggressive timeline, which will by will greatly facilitated by the streamlined Coastal approval process that is proposed in Special Condition 13.

Another benefit of Special Condition 13 and the staff report in general is the clear guidance it provides the District and OHVMR about what the Commission is likely to approve. Clarifying in advance what the Commission is willing to approve, for example, the planting of native dune vegetation, and the installation of wind fencing, porous roughness elements, and perimeter fencing in "areas specified (by APCD and/or CARB) as necessary to meet APCD and/or CARB requirements" will streamline mitigation implementation.

## **Specific Comments**

As noted above, the District supports Special Condition 13 and urges the Commission to adopt it at its July 11<sup>th</sup> meeting. A few modifications are suggested below; however, these are minor changes, and none of them warrant a delay in adopting the condition simply to incorporate them. In other words, the District believes that adopting Special Condition 13 now is preferential to delaying adoption to a future meeting in order to update it in response to these comments.

#### "Native" Vegetation

As described in the Particulate Matter Reduction Plan (PMRP),<sup>4</sup> when (re)establishing dune vegetation, OHMVR typically uses hybrid, sterile annual grasses to interplant with native species. The grasses provide cover for the transplanted native species while they are establishing themselves; however, the grasses cannot reproduce and die after about a year. This practice has proven to be highly effective and should be preserved. Special Condition 13.a states that "Approved dust control measures include planting native dune vegetation, installing wind fencing ..." While it does not specifically exclude the continued use of hybrid, sterile annual grasses, it would be beneficial to clarify that this practice can continue.

Similarly, the Scientific Advisory Group (SAG), which was established by the SOA in order to review and provide technical input to the PMRP and Annual Reports and Work Plans, recommends the addition of sea rocket (*Cakile maritama*) to the plant palette. In their comment letter on the Draft PMRP, they note that that "sea rocket is not a native species, but it has been thoroughly naturalized in this area, and performs a valuable ecological role in the establishment of incipient dunes." It is very common in foredunes of the Central Coast and is not considered to be either invasive or a threat to any local habitats. It is the opinion of the SAG, reinforced by the opinion of the Parks revegetation expert, that this species should be used in the foredunes. The California Invasive Plant

<sup>&</sup>lt;sup>4</sup> See sections 6.1.1 and 6.1.2 of the "Oceano Dunes State Vehicular Recreation Area Draft Particulate Matter Reduction Plan" (OMHVR, June 2019). Available online at <a href="https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Draft">https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Draft</a> PMRP 20190606.pdf

council rating is: Limited."<sup>5</sup> While Special Condition 13.a does not specifically exclude non-native species, it does not specifically include them in its list of "approved dust control measures". Specifically allowing the use of sea rocket—or more generally the use of SAG-approved non-native species—would be beneficial.

Finally, as discussed in the PMRP "The OHMVR Division has an established method for stabilizing and revegetating dune surfaces at Oceano Dunes SVRA using locally collected, native vegetation." It is not clear to the District whether this method is simply what experience has shown to be effective, or if it relates to a condition of OHVMR's CDP. In discussions with the District, OHMVR has stated that "locally collected" means collected from within the Oceano Dunes District, which includes the ODSVRA and the Pismo Dunes Nature Preserve. At the same time, OHVMR has cited the lack of suitable native seed as a constraint on their revegetation activities. The District would like Coastal Commission's definition of "locally collected" to be wide as possible and include a method to obtain approval for other areas with similar environments along the coast like Montaña de Oro State Park or south within the Guadalupe-Nipomo Dunes National Wildlife Refuge. District staff are admittedly neither botanists, ecologists nor dune restoration experts, so we pose this as a question to the Commission.

#### **Dust Control Measure Coverage**

Special Condition 13.d notes that "Dust control measures approved pursuant to this CDP **are expected** to result in planting/maintaining approximately 350 acres [emphasis added]." It does not say 350 acres is the *limit* of what is approvable, only that this is the expected coverage of new mitigation measures. The PMRP estimates that an additional 350 acres of dust control measures are likely needed to (almost) comply with the SOA, but this is just an estimate. As more data is collected in the annual report and work plan process, this estimate will be refined and is likely to change. In fact, less than 350 additional acres may be required (especially if the other Special Conditions are adapted and implemented). The District suggests the following addition (in italics): "Dust control measures approved pursuant to this CDP are expected to result in planting/maintaining approximately 350 acres, *but additional or fewer acres may be approved as necessary to fully meet the requirements of the APCD/CARB.*"

#### Flexibility to Create Riding Corridors through Vegetation

Allowing the ability to create trails through vegetated areas may allow for effective dust control while providing a new experience for riders. If these corridors were approved by the Scientific Advisory Group, the Air District, State Parks and Coastal Staff, the impact of the new vegetation to riding could be lessened while maintaining the vegetations dust control. We ask the commission to consider allowing this possibility.

<sup>&</sup>lt;sup>5</sup> Section 7.1.3, "Evaluation of: Oceano Dunes State Vehicular Recreation Area Draft Particulate Matter Reduction Plan" (SAG, February 25, 2019). Available online at <a href="https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/FINAL\_SAG%20REPORT\_JAN%2025\_2019.pdf">https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/FINAL\_SAG%20REPORT\_JAN%2025\_2019.pdf</a>



## COUNTY OF SAN LUIS OBISPO HEALTH COMMISSION

Commission Members:

Mary Jean Sage, Chair
Jean Raymond
Jnah Byram
Robert Campbell
Amy Kleinman
Ginger Cochran
Elisa Moylan
Catherine Shipp
Tamar Sekayan
Susan Warren
Candace Winstead

y 9, 2019 لل

California Coastal Commission c/o Kevin Kahn, District Supervisor Central Coast District Office 725 Front Street, Suite 300 Santa Cruz. CA 95060

Re: OHV activity at Oceano Dunes State Park

To the Members of the California Coastal Commission:

The San Luis Obispo County Health Commission has been examining the issue of health effects to our Nipomo Mesa residents caused by particulate matter from dust plumes that result from the Oceano Dunes State Park and Off-Highway Vehicle (OHV) riding. The Commission has concluded that Residents of the Nipomo Mesa who reside in the dust plume from the Oceano Dunes remain subjected to severe health risks despite years of effort to reduce or eliminate dust emissions from the OHV riding area. The SLO County Health Commission is in support of the California Coastal Commission's Staff recommendations to transition away from OHV use to less intensive forms of recreation. In reaching our conclusion, the Health Commission has examined the current data that exists as it pertains to the dust plume and the health of our county.

Rigorous studies conducted by the Air Pollution Control District (APCD) and other research organizations that unequivocally conclude that this dust originates from the Oceano Dunes (2007) and that Off-Highway Recreational Vehicles (OHV) use in the Oceano Dunes State Vehicular Recreation Area is responsible for allowing airborne transport of the dust during high winds (2010).

Science demonstrating the clear connection between OHV use on the dunes and Nipomo Mesa residents' exposure to serious health consequences from the dust have been evident for years. Yet, California State Parks' efforts to respond have been very slow and ineffective to date. Most troubling is the recent removal, by State Parks, of the control site dust monitoring station at Oso Flaco, without notification to APCD or California Air Resource Board (CARB). This site was essential given its downwind location adjacent to the OHV riding area to document whether control efforts in the riding area were actually effective in achieving the goals of the Rule 1001 court order of 2016. Implementation, by State Parks, of the April 2018 Stipulated Order of Abatement has been equally disappointing.

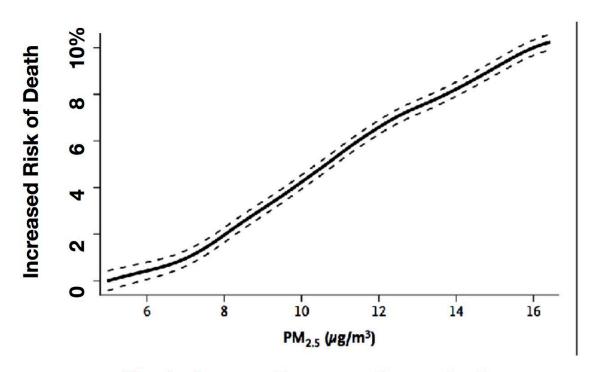
As this process drags on, Nipomo Mesa residents remain exposed to very serious acute,

chronic, and cumulative health impacts. Strong scientific consensus holds that both short and long term airborne Particulate Matter exposure cause serious lung and cardiovascular disease. There appears to be no minimum threshold for harm, and negative health effects increase linearly with increasing particulates. In large populations a clear correlation between PM exposure and mortality is evident, with mortality predictably decreasing as PM exposure is reduced.

The risk of early death from chronic exposure to airborne Particulate Matter has been clearly documented by several studies at the Harvard School of Public Health correlating local PM2.5 exposure with death records of over 20 million Medicare recipients.

Note, in the graph below, CDF residents are annually exposed to PM2.5 levels between 9.6 and 12.8 ug/m 3.

### Exposure to PM<sub>2.5</sub>



## **Yearly Average Exposure Concentration**

Air Pollution and Mortality in the Medicare Population New England Journal of Medicine 376;26 June 29, 2017 We strongly support the Coastal Commission's Staff recommendations to phase out OHV activity at Oceano Dunes State Park and take action to address the health concerns of our residents. SLO County Health Commission supports any measures which will diminish the ongoing threat to life and health of particulate emissions to downwind residents.

We appreciate your thoughtful consideration of our support.

Sincerely,

### Mary Jean Sage

Mary jean Sage, Chair County of San Luis Obispo Health Commission



July 5, 2019

Coastal Commissioners California Coastal Commission Central Coast District Office 725 Front Street, Suite 300 Santa Cruz, CA 95060

Re: Oceano Dunes State Vehicular Recreation Area (ODSVRA) Coastal Development Permit 4-82-300 Review

Dear Commissioners,

Santa Barbara County Air Pollution Control District (District) is a local agency with the mission to protect the people and the environment of Santa Barbara County from the effects of air pollution. We are writing to express our concern over the air quality impacts from use of off-highway vehicles, and especially the proposed expansion of off-highway vehicle use, at the ODSRVA that will affect air quality in Santa Barbara County. The County currently exceeds the 24-hr state ambient air quality standard for particulates less than 10 microns in diameter (PM10), and the standard is exceeded on a consistent basis in the northern portion of the county. For example, this standard was exceeded at the Santa Maria air quality monitoring station on 14 days in 2018, and on 22 days in 2017. Winds in this area are generally strong and from the north/northwest, which puts Santa Barbara County residents, particularly in Santa Maria and Guadalupe, right in the path of any particulate emissions from the ODSRVA.

The District offers the following comments on the Coastal Development Permit 4-82-300 Review.

- Off-highway vehicle use at the ODSVRA impacts air quality in Santa Barbara County. The ODSVRA is located at the northwestern end of the Santa Maria River valley, and lies within the Santa Maria Basin, Seasonal winds can increase up to 50 miles per hour or more. In the presence of open sheets of sand, sand grains become airborne and result in an increase of particulate emissions in downwind regions. The particulate monitor located in the City of Santa Maria consistently measures values over the state standard for particulate matter less than 10 microns in size (PM<sub>10</sub>). These high levels typically occur on windy days, when upwind monitors that are closer to the ODSVRA are also reading very high PM<sub>10</sub> levels. Measures to reduce air quality impacts from off-highway vehicle use at the ODSVRA will likely benefit air quality in Santa Barbara County.
- Any increase in off-highway vehicle use in the southern end of the ODSVRA will likely increase the magnitude of downwind air quality impacts in Santa Barbara County. Moving vehicle activity to the southern region of ODSVRA, as has been proposed by California Department of Parks and Recreation (California State Parks) in their Public

Works Plan (PWP) for Pismo State Beach and the ODSVRA, will result in denudation of vegetation, and an increase of sand sheets in closer proximity to residential communities in Santa Barbara County. Related to the PWP, the District has requested that California State Parks study the air quality impacts of the existing and proposed vehicle activity to Santa Barbara County, and has requested that they identify measures (e.g., a no project alternative) to ensure air quality impacts are fully mitigated. More specific comments are included in the District's March 5, 2019 letter to California State Parks, which is attached for reference.

In summary, we remain deeply concerned about the air quality and human health impacts that the ODSVRA has on residents of Santa Barbara County, particularly in the areas of Guadalupe and Santa Maria. The County's air quality is currently impacted by the ODSVRA, and any increased off-highway vehicle activity in the southern portion of the park has the potential to increase these impacts. These impacts include track-out emissions from vehicles accessing the entrance and camping area via Oso Flaco Road. We appreciate the Commission's efforts to address this impact and to ensure that the Coastal Development Permit 4-82-300 allows for the continued use of this state resource in a way that protects the air quality and health of the surrounding community.

Sincerely

Aeron Arlin Genet

Air Pollution Control Officer

Attachment: March 5, 2019 letter from SBCAPCD to California Department of Parks and Recreation

ce: Gary Wiley, SLOCAPCD Air Pollution Control Officer
Kevin Pearce, Chief Ranger/SPS II, California Department of Parks and Recreation
Dan Carl, Central Coast District Director, California Coastal Commission
Susan Craig, Central Coast District Manager, California Coastal Commission
Kevin Kahn, Central Coast District Supervisor, California Coastal Commission

### Attachment to July 5, 2019 Letter from SBCAPCD to Coastal Commissioners



Our Vision 'W Clean Air

March 5, 2019

Kevin Pearce, Chief Ranger/SPS II
California Department of Parks and Recreation
Oceano Dunes District
340 James Way Suite 207
Pismo Beach, CA 93449

Re: Public Works Plan for Pismo State Beach and Oceano Dunes State Vehicular Recreation Area (ODSRVA)

Dear Mr. Pearce,

Santa Barbara County Air Pollution Control District (District) is a local agency with the mission to protect the people and the environment of Santa Barbara County from the effects of air pollution. We are writing to express our concern over a recently proposed expansion of off-highway vehicle use at the ODSRVA that will affect air quality in Santa Barbara County. The County currently exceeds the 24-hr state ambient air quality standard for particulates less than 10 microns in diameter (PM10), and the standard is exceeded on a consistent basis in the northern portion of the county. For example, this standard was exceeded at the Santa Maria air quality monitoring station on 14 days in 2018, and on 22 days in 2017. Winds in this area are generally strong and from the north/northwest, which puts Santa Barbara County residents, particularly in Santa Maria and Guadalupe, right in the path of any particulate emissions from the ODSRVA.

The District offers the following comments on the Public Works Project (PWP) Concepts Public Meeting Information Packet that was workshopped in February 2019.

1. Any increase in off-highway vehicle use in the southern end of the ODSVRA will likely increase the magnitude of downwind air quality impacts in Santa Barbara County. The ODSVRA is located at the northwestern end of the Santa Maria River valley, and lies within the Santa Maria Basin. Seasonal winds can increase up to 50 miles per hour or more. In the presence of open sheets of sand, sand grains become airborne and result in an increase of particulate emissions in downwind regions. Moving vehicle activity to the southern region of ODSVRA will result in denudation of vegetation, and an increase of sand sheets in closer proximity to residential communities in Santa Barbara County. In order to understand potential impacts of the Oso Flaco Campground and Public Access Project, California Department of Parks and Recreation (California State Parks) should study the air quality impacts of the existing and proposed vehicle activity to Santa Barbara County. After establishing an understanding of the potential impacts, California State Parks

### Attachment to July 5, 2019 Letter from SBCAPCD to Coastal Commissioners

should identify measures (e.g., a no project alternative) to ensure air quality impacts are fully mitigated.

- Specific concerns related to Project Concepts 1 and 2. The District offers the following specific concerns regarding the project concepts in the information packet.
  - a. Both concepts involve an expansion of use and shifting of use to the southern portion of the ODSRVA area. This would shift the air quality impacts related to ODSRVA use further south, with more potential to cause additional air quality impacts to Santa Barbara County.
  - b. The creation of "sand highways" in both project concepts will cause the vegetation to become denuded, and will eventually cause those "sand highway" areas to become exposed, disturbed sand that will become entrained in the atmosphere and cause air quality impacts.
  - c. The staging areas, flat tracks, and kids' riding areas that are included in both project concepts will cause an increased amount of off-highway vehicle activities at the southern portion of the ODSRVA and will cause downwind air quality impacts. The long-term air quality impacts of providing a staging area for either 100 to 250 vehicles may have significant impacts to local air quality.
  - d. The track-out emissions from vehicles accessing the entrance and camping area via Oso Flaco Road needs to be fully evaluated and mitigated.
- Please provide our agency with all future notices related to any proposed changes at the ODSRVA.

In summary, we are very concerned about the potential for the proposed project concepts, and the associated increase in off-highway vehicle activity, to denude the existing protective vegetation in the Oso Flaco area and lead to increased air quality impacts to Santa Barbara County residents. We look forward to working with you to ensure the air quality impacts are addressed in the Draft Environmental Impact Report and Final PWP.

Sincerely

Aeron Arlin Genet

Air Pollution Control Officer

cc: Gary Wiley, SLOCAPCD Air Pollution Control Officer



July 5, 2019

California Coastal Commission 45 Fremont Street #2000 San Francisco, CA 94105

TO: Commissioners of the California Coastal Commission:

RE: Item 12A, Oceano Dunes Recreation Area

On behalf of The Marine Mammal Center (the Center), I write this letter with regard to Item Number 12A, Oceano Dunes Recreation Area (SVRA) Coastal Development Permit 4-82-300 Review on the Coastal Commission meeting agenda for July 11, 2019. The Center would like to express support for the Coastal Commission Staff Recommendations on management of the SVRA.

The Marine Mammal Center (the Center) is the world's leading marine mammal teaching hospital. As a non-profit hospital, research and education organization, the Center has treated more than 20,000 seals, sea lions and other marine mammals in its 44-year history. The Center's federally authorized marine mammal response operations occur over 600 miles of California's coastline from Mendocino to San Luis Obispo County as well as throughout the Hawaiian Islands. With an annual operating budget of \$11 million, more than 80 staff, and over 1,300 actively engaged volunteers, the Center operates 24 hours per day, 365 days per year. Our central mission is to advance ocean conservation through marine mammal rescue, education and research. Our scientific research team is an internationally recognized leader in advancing the science of marine mammal health, and by extension elucidating the health of the oceans. We believe strongly in promoting greater stewardship of the oceans and we conduct extensive education programs for school children and visiting members of the public.

The Center responds to potentially stranded marine mammals across San Luis Obispo County, including at Oceano Dunes. Over the years, the Center has developed a strong partnership with California State Parks in San Luis Obispo County, and conducts annual training for State Parks staff members assigned to the Oceano area on marine mammal rescue techniques. Together, the Center and State Parks staff respond to marine mammals coming ashore at Oceano Dunes.

Oceano Dunes is a commonly chosen natural resting spot for native protected and endangered marine mammal species, including California sea lions, Northern elephant seals, harbor seals, and at times, northern fur seals, the endangered Guadalupe fur seals and southern sea otters. Seals and sea lions come ashore to rest, which is part of their natural behavior, but this can prompt concern on the part of the public who view them as to their well-being. Therefore, with the exception of Oceano Dunes, throughout our rescue range the Center's trained responders first

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conduct an assessment to determine if a reported marine mammal is truly stranded according to definitions set by the Marine Mammal Protection Act, or, if it has simply come ashore to rest. In addition, if the marine mammal does appear to be sick, injured, or otherwise stranded, responders will also assess whether that animal is better off resting to recover on its own or if the condition is serious enough to warrant rescue and care at our veterinary hospital.

At Oceano Dunes, resting on land is not an option for marine mammals, due to vehicles driving on the beach, including frequently high traffic, lack of driving lanes, and night driving. At the request of California State Parks, and based on the high risk of vehicle strike, the Center picks up all marine mammals coming ashore there for safety reasons, whenever feasible. Night driving on the SVRA presents an even higher risk of vehicle strike to resting marine mammals, with minimal lighting and visibility for drivers to spot and avoid a resting animal. In fact, Oceano Dunes is the only beach across the Center's 600-mile California coastal range, where both California State Parks and the Center have deemed it unsafe for a marine mammal to rest on land day or night for any extended period of time. In 2018, the Center rescued a total of 261 marine mammals across San Luis Obispo County. Of these, 51, or 20%, came from the Oceano Dunes SVRA. During the past four years (2015-2018), the Center rescued 1,166 marine mammals in San Luis Obispo County, with 209, or again, about 20% of marine mammal rescues, occurring in the SVRA.

Given the Center's extensive experience with marine mammal response on the SVRA, and based on the high numbers of marine mammals attempting to rest at Oceano Dunes, along with the corresponding high risk of injury or death due to vehicle traffic, the Center supports the Coastal Commission's Staff Recommendations on management. The Center believes that with implementation of the Coastal Commission's Staff Recommendations, the shore at Oceano Dunes SVRA can be made safer for people and for protected and endangered native wildlife.

Thank you for considering this letter of support and for all the Commission does to steward our coastline. I'm happy to address any questions that you might have.

Sincerely,

Dr. Jeff Boehm

**Executive Director** 



California Coastal Commission

June 29, 2019

RE: Review of Coastal Development Permit 4-482-300 and proposed Public Works Program for the Oceano Dunes State Vehicular Recreation Area

Via Email Kevin.Kahn@coastal.ca.gov

Dear Commissioners,

North County Watch is a 501 3c non-profit Public Benefit corporation. We are an all-volunteer organization incorporated in 2001 committed to sustainable development in and around San Luis Obispo County.

The Commission needs to act immediately to abate the Public Nuisance created by its decades long failure to enforce and deal with severe health and safety issues. At a minimum the Commission should act today to implement staff recommendations for the Oceano Dunes.

#### THREATS TO HEALTH AND SAFETY

Numerous studies worldwide have produced evidence that air pollution and particulate matter is a serious threat to longevity, degrades quality of life, and is a causative factor in dementia<sup>1</sup>.

Researchers at the National Bureau of Economic Research determined that long-term exposure
to fine-particulate air pollution "degrades human capital by causing dementia. ... We conclude
that regulation of air pollution has greater benefits than previously known, in part because
dementia impairs financial decision making. We estimate that the dementia-related benefits of

https://www.motherjones.com/environment/2018/01/air-pollution-killed-more-than-6-million-people-in-2016/

https://www.motherjones.com/environment/2017/12/study-even-legal-air-pollution-is-killing-older-americans/

<sup>&</sup>lt;sup>1</sup> https://www.motherjones.com/environment/2019/05/researchers-now-have-even-more-proof-that-air-pollution-can-cause-dementia/

the EPA's county nonattainment designations exceeded \$150 billion. We also find that the effect of PM2.5 on dementia persists below current regulatory thresholds." **NBER Working Paper No. 24970, Issued in August 2018;** https://www.nber.org/papers/w24970

- In 2018 researchers looked at 130,000 older residents in London and concluded "We have found evidence of a positive association between residential levels of air pollution across London and being diagnosed with dementia, which is unexplained by known confounding factors." <a href="https://bmjopen.bmj.com/content/8/9/e022404">https://bmjopen.bmj.com/content/8/9/e022404</a>
- "In the US Medicare population from 2000 to 2012, short-term exposures to PM<sub>2.5</sub> and warm-season ozone were significantly associated with increased risk of mortality. This risk occurred at levels below current national air quality standards, suggesting that these standards may need to be reevaluated." Association of Short-Term Exposure to Air Pollutants with Mortality on Older Adults JAMA. 2017;318(24):2446-2456 <a href="https://jamanetwork.com/journals/jama/article-abstract/2667069?redirect=true">https://jamanetwork.com/journals/jama/article-abstract/2667069?redirect=true</a>
- "Residence in high PM<sub>2.5</sub> locations was associated with increased risks of global cognitive decline and all-cause dementia. ...that exposure to urban airborne particulates can intensify amyloid accumulation and neurodegeneration. Transitional Psychiatry <u>Transl Psychiatry</u>. 2017 Jan; 7(1): e1022. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5299391/
- Worldwide there were <u>6.1 million air pollution death in 2016.</u> http://ghdx.healthdata.org/gbd-results-tool

### **PUBLIC NUISANCE**

For four decades the Coastal Commission Staff Reports have chronicled State Parks' noncompliance and the Commission's failure to enforce the Local Coastal Program at the Oceano Dunes. Clearly the Coastal Commission is aware of the risks to public health and public trust assets. This negligent noncompliance and failure to enforce has created a Public Nuisance<sup>2</sup>. The nuisance has resulted in a serious threat to the health and safety of residents in surrounding areas, the destruction of environmental and public trust resources, health and safety threats to the visitors to the dunes and beaches, and the economic impacts to surrounding communities.

The Commission has a duty to enforce and has recourse to abate the problems. "The public nuisance doctrine is aimed at the protection and redress of *community* interests and, at least in theory, embodies a kind of collective ideal of civil life which the courts have vindicated by

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<sup>&</sup>lt;sup>2</sup> "The elements 'of a cause of action for public nuisance include the existence of a duty and causation.' Public nuisance liability 'does not hinge on whether the defendant owns, possesses or controls the property, nor on whether he is in a position to abate the nuisance; the critical question is whether the defendant created or assisted in the creation of the nuisance.' " (*Melton v. Boustred* (2010) 183 Cal.App.4th 521, 542 [107 Cal.Rptr.3d 481], internal citations omitted.)

equitable remedies since the beginning of the 16th century." (*People ex rel. Gallo v. Acuna* (1997) 14 Cal.4th 1090, 1103 (*Acuna*).) The expectation of air quality that does not cause dementia, shorten life expectancy, and severely depressed quality of life is a standard of civil life for the surrounding communities and vital to "community interests".

Civil Code section 3480 provides: "A public nuisance is one which affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal."

The nuisance is substantial and unreasonable.<sup>3</sup> The interference to the public from severely polluted air is evidenced in volumes of studies exposing the health risks of fine particulate matter such as is generated by the Oceano Dunes State Park. These health and safety risks<sup>4</sup> have been well stated in the public record.

The Commission has failed to abate the nuisance even in the face of years of evidence that health and safety are threatened by the continuation of the status quo. This failure puts the Commission at risk for financial liability for the health and safety impacts to residents and visitors and other losses. This nuisance interferes with health and safety and has the potential to cause financial harm to nearby communities from loss of use or the interference with the expectation of safe and healthy enjoyment of their property. The Commission is at risk of creating a permanent or long lasting condition<sup>5</sup> of nuisance by its failure to enforce permits.

### **EXAMPLES OF ACTIONS**

The Commission needs to act immediately to abate the nuisance created by its decades long failure to enforce and deal with severe health and safety issues, and violations of the

- 1. A public nuisance is an unreasonable interference with a right common to the general public.
- 2. Circumstances that may sustain a holding that an interference with a public right is unreasonable include the following:
  - a. whether the conduct involves a significant interference with the public health, the public safety, the public peace, the public comfort or the public convenience, or
  - b. whether the conduct is proscribed by a statute, ordinance or administrative regulation, or
  - c. whether the conduct is of a continuing nature or has produced a permanent or long lasting effect, and, as the actor knows or has reason to know, has a significant effect upon the public right.

<sup>&</sup>lt;sup>3</sup> "Of course, not every interference with collective social interests constitutes a public nuisance. To qualify . . . the interference must be both substantial and unreasonable." (*People ex rel. Gallo, supra*, 14 Cal.4th at p. 1105.)

<sup>&</sup>lt;sup>4</sup> "An essential element of a cause of action for nuisance is damage or injury." (*Helix Land Co., Inc. v. City of San Diego* (1978) 82 Cal.App.3d 932, 950 [147 Cal.Rptr. 683].)

<sup>&</sup>lt;sup>5</sup> Restatement (Second) of Torts, beginning with Section 821B

Endangered Species Act. The Commission should act today to implement staff recommendations for the Oceano Dunes.

- Only governmental and emergency motor vehicles allowed to operate in the park. A State Parks shuttle will take visitors into the park.
- Pier and Grand Avenue entrances closed to motor vehicles, except government and emergency vehicles, and beach/dunes restored at those locations.
- Permanent preservation of Oso Flaco as a nature reserve.
- Enhancement of light-footprint recreational opportunities (e.g. hiking, tent camping, surfing, sandboarding, birdwatching, education, equestrian, etc.).
- Restoration of fore dunes, dune vegetation, and a healthy beach and dune environment.
- Enhanced protection of culturally and environmentally sensitive areas and wildlife.

Thank you for your consideration of our comments.

Respectfully,

Susan Harvey, President

### LAW OFFICES OF THOMAS D. ROTH ONE MARKET, SPEAR TOWER, SUITE 3600 SAN FRANCISCO, CALIFORNIA 94105 (415) 293-7684

### **By Email**

July 5, 2019

Dan Carl, Central Coast District Director Susan Craig, Central Coast District Manager Kevin Kahn, Central Coast District Supervisor California Coastal Commission Central Coast District Office 725 Front Street, Suite 300 Santa Cruz, CA 95060

> Re: Comments on Behalf of Friends of Oceano Dunes re July 11, 2019 California Coastal Commission Meeting Agenda Item 12.a (CDP No. 4-82-300 Review)

Dear staff:

This letter is being submitted on behalf of Friends of Oceano Dunes, which is a California not-for-profit corporation, representing approximately 28,000 members and users of the Oceano Dunes State Vehicle Recreation Area ("SVRA") located near Pismo Beach, California.

On June 21, 2019, Staff released a staff report for the CCC's July 11, 2019 hearing regarding CDP No. 4-82-300 (Oceano Dunes State Vehicular Recreation Area (ODSVRA)).

Staff advocates banning or severely restricting OHV at Oceano Dunes SVRA even though that is the entire purpose of an SVRA: "Put simply, in staff's view a Park that is fully consistent with on-the-ground realities, and with coastal resource protection requirements, does not include OHV use." As detailed below, such a goal places the Commission in direct conflict with State Parks. Indeed, the Commission has no authority to compel such a result and is aggressively impeding on the legislatively-sanctioned authority of State Parks to establish, develop, manage, operate and plan the SVRA. The "on-the-ground reality" is that the Commission can't wave a magic wand and declare that an SVRA is no longer an SVRA. The Commission's actions and proposals are arbitrary, lack substantial evidence, are contrary to law, and are a prejudicial abuse of discretion. The Commission's remedy lies with the Legislature in Sacramento – the Commission cannot simply attempt to regulate the SVRA out of existence as it has been seeking to do for decades now.

The Commission's drastic reworking of the CDP combined with such a short time for public input over a major Holiday violates Friends and the public's fair hearing, due process and equal protection rights. Pub. Res. Code § 30339 mandates that the Commission "(a) Ensure full and adequate participation by all interested groups and the public at large in the commission's work program." The Commissions drastic proposals require more than a few weeks of public review for a facility and a CDP that has been in place for 30 years. The Commission's notice is improper because it fails to clearly indicate that the Commission is seeking a permit amendment that drastically changes the permit terms.

# Friends thus requests a 90 days extension of the public comment period.

This firm submits the following additional comments on Friends' behalf and Friends' members' behalf:

- Staff asserts that the conditions of CDP No. 4-82-300 have not been fulfilled. This is false.
- 2. Staff alleges that the CDP authorized interim Park entrances (including the construction of two interim kiosks at the two interim entry points), but the truth is these Park entrances have been finalized through State Parks actions taken many, many years ago. State Parks has repeatedly submitted this information to the CCC but staff ignores it. The CCC alleges that there are open enforcement cases related to the "interim access/use parameters," but staff has presented no evidence of enforcement cases, and State Parks denies any violations. See attached letter from State Parks dated May 14, 2007. Indeed, the Commission's June 12, 2019 letter to State Parks tellingly makes no mention of any enforcement actions or investigations with respect to "interim access/use parameters."
- 3. In addition, it is inappropriate, if not unlawful and unethical, for the Commission to bring an enforcement action against its sister agency, State Parks. From a practical perspective, it is unclear how the Commission would ask the Attorney General's Office to initiate proceedings against State Parks when the Attorney General's Office also represents State Parks. Given the many conflicting legal positions between the Commission and State Parks identified and historical with respect to this SVRA, the State Attorney General is ethically and legally prohibited from representing both the Commission and State Parks in any litigation challenging the Commission's action in this matter.
- 4. The Commission staff also would require State Parks to pay for attorneys' fees and other costs in defense of the CDP. That type of provision is inappropriate given that the two agencies are sister agencies housed under the Natural Resources Agency.

- 5. Staff makes clear that its purpose in this year's review is simply to find a way to shut down the Park to OHV use: "The bottom line in staff's view is that the Park and the CDP cannot continue to operate as it has in the past, and that the range of coastal resource issues and constraints affecting ODSVRA together suggest that it is time to start thinking about ways to transition the Park away from high-intensity OHV use to other less intensive forms of public access and recreation."
- 6. Pub. Resources Code, § 5090.43(a) states that SVRAs must be "operated to provide off-highway vehicle recreation opportunities." The statute also authorizes SVRAs "where there are quality recreational opportunities for off-highway motor vehicles." The CCC now proposed to eliminate or quickly phase out OHV use of Oceano Dunes, which means the SVRA won't be "operated" for OHV recreational opportunities, even though the CCC staff readily admits Oceano Dunes "provides a unique public recreational access opportunity, and it is very popular for RV camping as part of the OHV experience." This violates Pub. Resources Code, § 5090.43(a).
- 7. Pub. Resources Code § 5090.43(a) further states "Areas shall be developed, managed, and operated for the purpose of providing the fullest appropriate public use of the vehicular recreational opportunities present, in accordance with the requirements of this chapter, while providing for the conservation of cultural resources and the conservation and improvement of natural resource values over time." The CCC now proposes to eliminate or quickly phase out OHV use of Oceano Dunes, which means the SVRA will not be "developed, managed, and operated for the purpose of providing the fullest appropriate public use of the vehicular recreational opportunities present." This violates Pub. Resources Code, § 5090.43(a).
- 8. Pub. Res. Code § 5090.43(a), in providing "for the conservation of cultural resources and the conservation and improvement of natural resource values over time," does not authorize the cessation of OHV activity. The statute requires a balancing of the "fullest" public use of OHV while providing for conservation. The CCC exceeds its authority by simply throwing in the towel and refusing to allow OHV at a site that has had OHV and motor vehicle use for more than a century. Further, the agency statutorily authorized with managing the site (State Parks) doesn't agree with the Commission's assessment.
- 9. The CCC asserts that the CDP it granted to State Parks in 1982 was not permanent, but interim. That is false. The CCC now spins the lie that it could revoke the permit at will at any time. The Coastal Act grants the CCC no such authority. If the CCC believes more needs to be done to address impacts to sensitive resonrces, Pub. Resources Code, § 5090.43(c) provides the remedy: "If off-highway motor vehicle use results in damage to any natural or cultural resources or damage within

sensitive areas, appropriate measures shall be promptly taken to protect these lands from any further damage. These measures may include the erection of physical barriers and shall include the restoration of natural resources and the repair of damage to cultural resources." Pub. Resources Code, § 5090.43(c) doesn't authorize banning OHV from an SVRA. The CCC is exceeding its authority. OHV operations at Oceano Dunes have not changed substantially recently in a way that suggests that the impacts are greater now than in the past. Indeed, OHV impacts now are far less than in 1982 when the CCC granted the permit.

- 10. Pub. Resources Code, § 5019.53 states: "State parks consist of relatively spacious areas of outstanding scenic or natural character, oftentimes also containing significant historical, archaeological, ecological, geological, or other similar values. The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, . . . Each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes <u>to</u> the extent compatible with the primary purpose for which the park was established. Improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations. <u>Improvements may be undertaken to provide for</u> recreational activities including, but not limited to, camping, picnicking, sightseeing, nature study, hiking, and horseback riding, so long as those improvements involve no major modification of lands, forests, or waters. Improvements that do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks." This statute debunks the Commission's staff's insistence that it has authority to close the SVRA. Conservation must be done in a way that is consistent with the primary purpose of the park, which is for OHV recreation and beach camping and driving.
- 11. Pub. Resources Code, § 5019.56 states, in part: "State recreation units... shall be further classified as one of the following types: (a) State recreation areas, consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs.... Improvements may be undertaken to provide for recreational activities,..." Oceano Dunes was created in part to serve regional and state needs for a major OHV facility.
- 12. Dust control measures that drastically reduce beach camping or beach driving are contrary to Pub. Resources Code, § 5019.62 which states that

- "improvements which do not directly enhance the public enjoyment of the natural, scenic, cultural, ecological, or recreational values of the seashore, or which are attractions in themselves, shall not be undertaken."
- 13. Pub. Resources Code § 30401 provides that "enactment of this division [the Coastal Act] does not increase, decrease, duplicate or supersede the authority of any existing state agency." That statute also states that the "commission shall **not** set standards or adopt regulations that duplicate regulatory controls established by any existing state agency pursuant to specific statutory requirements or authorization." In other words, the Coastal Act does not authorize the Coastal Commission to supersede the authority of State Parks to "plan, acquire, develop, conserve, and restore lands in the state vehicular recreation areas." Pub. Resources Code, § 5090.32(a). Yet, that is what the Commissions seeks to do by phasing out or banning OHV at Oceano Dunes. The Coastal <u>Act does not authorize the Coastal Commission to supersede</u> the authority of State Parks to "manage, maintain, administer, and operate lands in the state vehicular recreation areas." Id. at § 5090.32(b). Yet, that is what the Commissions seeks to do by phasing out or banning OHV at Oceano Dunes. The Coastal Act does not authorize the Coastal Commission to supersede the authority of State Parks to "provide for the conservation of natural and cultural resources." including appropriate mitigation." Pub. Resources Code, § 5090.32(1). Yet, that is what the Commissions seeks to do by phasing out or banuing OHV at Oceano Dunes. The Coastal Act does not authorize the Coastal Commission to supersede the authority of State Parks to "... take steps necessary to prevent damage to significant natural and cultural resources within state vehicular recreation areas." Pub. Resources Code, § 5090.35(a). Yet, that is what the Commissions seeks to do by phasing out or banning OHV at Oceano Dunes. The Coastal Act does not authorize the Coastal Commission to supersede the authority of State Parks to "protect natural, cultural, and archaeological resources within the state vehicular recreation areas." Pub. Resources Code, § 5090,35(f). Yet, that is what the Commissions seeks to do by phasing out or banning OHV at Oceano Dunes.
- 14. The Commission staff has completely misanalysed the respective legislative authority of State Parks and the Commission at SVRAs. Staff asserts: "....legislation (i.e., PRC Section 5090 et seq... supports and encourages OHV recreational use, but at the same time it does not support it at all costs. In fact, the legislation is clear that when OHV use is leading to problems, such as is the case at ODSVRA, then it is appropriate to shut down that use if necessary to protect sensitive natural and cultural resources. For example, PRC Section 5090.02(a)(3) states that the Legislature finds: "The indiscriminate and uncontrolled use of those vehicles may have a

deleterious impact on the environment, wildlife habitats, native wildlife, and native flora"; and PRC Section 5090.02(c)(4) states: "When areas or trails or portions thereof cannot be maintained to appropriate established standards for sustained long-term use, they should be closed to use and repaired, to prevent accelerated erosion. Those areas should remain closed until they can be managed within the soil conservation standard or should be closed and restored"; and PRC Section 5090.35(a) states: "The protection of public safety, the appropriate utilization of lands, and the conservation of natural and cultural resources are of the highest priority in the management of the state vehicular recreation areas." Thus, although it has been argued by some that this enabling legislation does not allow for the phasing out of OHV use, the legislation itself paints a different picture, one that clearly recognizes that it does not stand for OHV use at all cost, and rather requires such use to be undertaken in a manner consistent with long-term sustainable use where the conservation of natural and cultural resources is prioritized; and it certainly allows for closing off OHV use where it is causing the types of problems it is causing at ODSVRA. In addition, and perhaps just as compelling, PRC Section 5090 does not somehow preempt other State laws, including the Coastal Act (and by extension the LCP). On the contrary, as with other laws affecting the same resources, it is important to harmonize the laws as much as possible. On that point, here, proper application of both laws based upon facts on the ground would appear to suggest the same outcome: namely that OHV use at this location is not sustainable, and the time has come to transition to other appropriate recreational uses."

- 15. None of the statutes quoted by the Commission staff authorize closing down an entire SVRA. The statutes speak of closing certain "trails" or areas to allow for restoration or conservation, not closing an entire SVRA. Indeed, the statutes emphasis the need to <a href="mailto:balance">balance</a> OHV use and resource values. Of course, there is a need to balance and harmonize the competing interests. <a href="mailto:Balancing and harmonizing by definition can't include the elimination of one side of those competing interests. Yet, that is staff's "final solution."
- 16. The Commission staff's proposed changes to the CDP would eliminate OHV at the SVRA and scapegoat OHV for all issues at the Park.
- 17. The Commission's effort to ban OHV at an existing SVRA flies in the face of the Legislature's express intent that "existing off-highway motor vehicle recreational areas, facilities, and opportunities should be expanded and managed in a manner consistent with this chapter, in particular to maintain sustained long-term use." Pub. Res. Code § 5090.02(c)(1). Oceano Duues SVRA can be maintained for long-term sustained use and it has been managed that way for decades. Issues that exist now have always existed at this site and are not new. State Parks has effectively managed the site nonetheless. Friends has proposed way

- in which other areas at Oceano Dunes can be re-opened in accordance with the statutory mandate to "expand" existing facilities. The Commission won't even consider those suggestions.
- 18. The Commissions staff's effort to ban or severely restrict OHV, beach driving and beach camping also is contrary to numerous Coastal Act policies.
- 19. Pub. Resources Code, § 30001.5 states, in part, that basic goals of the State are to: "(c) Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners; and (d) Assure priority for coastal—dependent and coastal—related development over other development on the coast." Banning or severely restricting OHV does not advance these goals.
- 20. At Oceano Dunes there are conflicts between recreational and public access policies and conservation policies. Pub. Resources Code, § 30007.5 states: "The Legislature further finds and recognizes that conflicts may occur between one or more policies of the division. The Legislature therefore declares that in carrying out the provisions of this division such conflicts be resolved in a manner which on balance is the most protective of significant coastal resources. In this context, the Legislature declares that broader policies which, for example, serve to concentrate development in close proximity to urban and employment centers may be more protective, overall, than specific wildlife habitat and other similar resource policies." Thus, the Commission's decision in 1982 to concentrate all OHV at Oceano Dunes in order to reduce OHV impacts was consistent with this policy. Staff's new suggestion to eliminate OHV at Oceano Dunes is inconsistent with this policy.
- 21. Pub. Resources Code, § 30013 states: "The Legislature further finds and declares that in order to advance the principles of environmental **justice** and equality, subdivision (a) of Section 11135 of the Government Code and subdivision (e) of Section 65040.12 of the Government Code apply to the commission and all public agencies implementing the provisions of this division. As required by Section 11135 of the Government Code, no person in the State of California, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, genetic information, or disability, shall be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination, under any program or activity that is conducted, operated, or administered pursuant to this division, is funded directly by the state for purposes of this division, or receives any financial assistance from the state pursuant to this division." The Commission's push to limit beach camping is contrary to the principles of environmental justice by restricting and reducing the opportunities for low-cost camping opportunities on the beach and in the coastal zone.

- The same goes for OHV and beach driving opportunities which are unique in California to this site.
- 22. The Commission's push to limit beach camping (and the impact of the expanded dust control measures) violate Pub. Resources Code, § 30213 which states in part: "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible. provided. Developments providing public recreational opportunities are preferred."
- 23. Pub. Resources Code, § 30221 states "Oceanfront land <u>suitable for recreational use shall be protected for recreational use and development</u> unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area." OHV cannot be accommodated elsewhere in the area, the County or the region. OHV is banned elsewhere in the County and as the Commissions has stated "Oceano Dunes the only California coastal park to allow vehicles to drive on dunes and beach sand, ODSVRA provides a unique public recreational access opportunity, and it is very popular for RV camping as part of the OHV experience."
- 24. Pub. Resources Code, § 30211 states "<u>Development shall not interfere with the public's right of access to the sea</u> 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." The Commissions staff's effort to ban or severely restrict OHV, beach driving and beach camping as well as the massive dnst control measures interferes with the public's right of access to the sea.
- 25. Pub. Resources Code, § 30223 states: "Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible." Oceano Dunes unique experience includes the combination of upland dunes with direct access to the beach and beach camping. The Commission's push to limit OHV on the dunes (and the impact of the expanded dust control measures) violate Pub. Resources Code, § 30223.
- 26. Pub. Resources Code, § 30240(b) states: "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." The expanded dust control program by increasing predation of sensitive species significant degrades these habitats, is incompatible with the habitats and recreation areas and is not sited or designed to prevent such impacts.
- 27. The Commission asserts that the PWP projects including a southern

- entrance "present what appear to be serious LCP inconsistencies related to agricultural conversion." **Staff provides no evidence of this.** The PWP proposals would be consistent with Pub. Resources Code, § 30241(e) because the facility expansion would not "impair agricultural viability." See also subsection (b) and §§ 30241.5, and 30242.
- 28. Pub. Resources Code, § 30253(b) states that new development most "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 massive new vegetation being added under the dust control measures violates this provision because the vegetation creates depressions downwind that lead to erosion and geologic instability and/or destruction of the site.
- 29. Pub. Resources Code, § 30414(c) states "The State Air Resources Board and any air pollntion control district may recommend ways in which actions of the commission or any local government can complement or assist in the implementation of established air quality programs." But the Commission cannot accept recommendations that cause violations of other Coastal Act policies or other laws such as endangered species protections.
- 30. Pub. Resources Code, § 30411(a) states: "The Department of Fish and Wildlife and the Fish and Game Commission are the principal state agencies responsible for the establishment and control of wildlife and fishery management programs and the commission shall not establish or impose any controls with respect thereto that duplicate or exceed regulatory controls established by these agencies pursuant to specific statutory requirements or authorization." The Commission's special condition violate this provision by commanding certain actions by State Parks related to sensitive species that usurp CDFW's authority and role.
- 31. The Commission staff recommends increased predator management, which is fine, except staff ignores that the massive dust control program would cause take of the western snowy plover and the least tern in numbers that dwarf any impacts of OHV directly as the result of an increase in predators hidden by a massive expansion of vegetation. Staff's response to that much larger threat? crickets. Proposed special condition 1 fails to even mention the relationship between the dust control program and the new influx of predators it will cause and impacts to endangered species.
- 32. The Commission staff recommends greater speed operations enforcement even though there is no evidence of problems with speed or frequent exceedances of vehicle quotas.
- 33. The Commission staff recommends more and better fencing when there

- is no evidence that State Parks has been lax in installing fencing, or that the current fencing is inadequate in any way.
- 34. The Commission staff recommends elimination of the TRT in order to quiet the voice of the OHV community. The elimination of the TRT eliminates all diversity in working to balance the needs of the park.
- 35. The Commission staff recommends prohibiting vehicular crossings of Arroyo Grande Creek when it flows (i.e., shut down all OHV and camping operations during this time) except for emergency vehicles. This is simply a way to close OHV access to the Park. Properly regulated crossings result in no significant environmental consequence. They have been allowed for 100 years and there has been no evidence of impacts to salmon or any other fish or any other species.
- 36. The Commission staff alleges "coastal resource problems associated with vehicular crossings of Arroyo Grande Creek, including impacts on listed fish species, pollution from vehicles, and overall degradation of stream morphology and structure from vehicle tracks through steam banks and breaching." Yet, the staff fails to present any evidence showing any such impacts. Staff asserts that its "biologist" "has documented significant concern with the vehicular creek crossing allowance and the impacts it has on creek health." What does it mean to document a "concern"? Staff doesn't say that it documented "impacts." Staff repeatedly say this "may" happen, or that "may" happen without a scintilla of evidence that any impacts to sensitive species have or are happening. It is perhaps the most unscientific analysis by any state agency in the history of California.
- 37. The Commission notes that it considers Oceano Dunes to be ESHA. But, if so, the area was ESHA when it was designated as an SVRA and when the Commission granted a permit for OHV use in 1982. In part, the permit was granted because the area had been used for vehicle recreation dating back to the early 1900s, long before there was a Coastal Act or someone ever dreamed up the phrase "environmentally sensitive habitat area." The permit was intended to impose reasonable limits on a pre-existing use as a compromise. But now the Commission staff has changed its tune. It no longer is seeking reasonable permit conditions, but onerous ones that are designed as a step toward a total ban on OHV at a park that was established specifically to allow OHV and focus OHV in a specific area of the County.
- 38. The Commission staff recommends reducing "interim" vehicular and OHV daily use limits to an amount proportionate to the acreage that has been removed from vehicular/OHV use (e.g., due to dust control requirements, other exclosures, etc.). First, the use limits are no "interim." They have existed for decades. This is another falsehood by staff. Second, Commissions staff concluded in its Revised Findings on the 2017 dust control program that the reduction in riding area from

that program was not significant - "the reduction is relatively minor when compared with ODSVRA's size and remaining access/recreation opportunities and thus will not significantly adversely affect public access/recreation opportunities . . . . " Yet, now staff will add on top of that reduction a limit to the number of vehicles because it now argues that the reduced acreage cannot support as many vehicles. So, in 2017, staff said, don't worry, there's plenty of land left for OHV, but now in 2019, staff says, oh, wait because we reduced the area for OHV we can't allow as many OHV vehicles. Of course, this has been the plan all along and shows how dishonest and disingenuous staff is. This is straight out of George Orwell's "1984." In his novel, the Ministry of Plenty rations and controls food, goods, and domestic production. Every fiscal quarter, it publishes false claims of having raised the standard of living, when it has, in fact, reduced rations, availability, and production. Here, staff makes false statements of the wide availability of lands for OHV as it simultaneously reduces the acreage and then insists that the reduced acreage means of course you must reduce the number of vehicles. The Ministry of Truth substantiates the Ministry of Plenty's claims by revising historical records to report numbers supporting the current, "increased" OHV recreational opportunities. (See staff report: "Special Condition 9 modifies the existing specified interim use limits due to loss of OHV acreage (based upon dust control efforts, habitat needs, etc.) since the time they were established in 2001. Specifically, since the existing interim limits were based off 1,500 acres being available for OHV and camping use back in 2001, and that acreage amount has been reduced by 30% since then down to 1,048 acres (i.e., 152 acres has been converted for dust control purposes and 300 acres for habitat needs, see additional discussion on both of these issues subsequently), the use numbers must also be reduced a commensurate 30%. Special Condition 9 also specifies that a street-legal vehicle that also camps overnight is counted towards both totals to better confine and prescribe such uses and use intensities, and for clarity and ease of enforcement."

- 39. This effort to squeeze all OHV into a small area also violates Pub. Resources Code, § 30212.5 which states: "Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area." Staff is creating overcrowding by forcing the same number of OHV and persons in a smaller and smaller area.
- 40. The Commission staff recommends "evaluating" changes that can be made to provide vehicular access into the Park in way that can reduce coastal resource impacts, particularly as such vehicular access relates to Arroyo Grande Creek crossings and more normal and typical beach uses north of the riding area. State parks has studied alternate access

repeatedly for decades. Friends recommended a specific, detailed plan for a southern entrance to the Natural Resources Agency and to State Parks years ago and both agencies have sat on their hands. This is needed from an emergency access standpoint and has nothing to do with alleged impacts to Arroyo Grande Creek, which actually only a creek for a few weeks each year. What are more "normal" beach uses? This is an SVRA. It was created expressly for OHV. OHV use at an SVRA is a "normal" use. Indeed, it's the whole point of an SVRA. But staff's characterization of what's "normal" shows its bias against OHV recreation.

- 41. The Commission staff recommends making the seasonal plover exclosure permanent. This is laughable. In 2017, staff approved a massive dust control program that would cause dozens of deaths of plover. Yet, it wants to make the exclosure permanent when there are infrequent deaths of plover from OHV use and in fact Oceano Dunes has the most successful plover breeding location in the entire United States. Of course, the real reason staff wants to close off the area is to squeeze OHV in to a smaller area, so that staff can then claim that such a small area can't support so many vehicles so vehicles must be reduced.
- 42. In fact, many of the increased problems related to species impacts, etc. are directly attributable to the Commission forcing the same number of OHV vehicles into smaller and smaller areas and then claiming, see the area can't support OHV. The reason this becoming an issue is because the Commission and other agencies have reduced the riding area by thousands of acres when compared to the 1970s. It's like forcing everyone on an international flight to sit in two rows of the airplane even if they have to sit on each other's lap 5 people high. Of course, if you force all the passengers in only two rows there will be issues.
- 43. Amazingly, Commission staff continues to focus on a few plover deaths per year (on average) caused by OHV while simultaneously systematically ignoring the massive increase in predation that will result from installation of the dust control measures. Staff ignores the fact that the Oceano Dunes has established conditions that result in the increase of the plover year after year, exceeding USFWs expectations.
- 44. The Commission staff also recommends allowing perimeter fencing and/or vegetation and related development (e.g., monitoring equipment, etc.) for dust control purposes for all areas specified by the San Luis Obispo County Air Pollution Control District. Yet, the Commission already purported to allow this in its approval of the CDP for the dust control program.
- 45. The Commission staff states: "Staff has been discussing all of these very

issues with State Parks staff, including in similar detail as provided in this staff report, for the past several months, including through meetings in both Santa Cruz and Sacramento." Friends requests that the Commission and State Parks make public all notes, memoranda and other documents reflecting any and all discussions and decisions made at those meetings.

- 46. If State Parks will be required to prepare a public outreach plan for lower-income, youth, and tribal persons, that outreach program should include efforts to introduce those persons to OHV recreation.
- 47. The Commission staff's recommendation that the TRT be eliminated is a thinly veiled effort to eliminate or minimize stakeholder input specifically to reduce the role of the OHV community including Friends from working with State Parks to manage the SVRA. This is just another step towards the Commission's now open goal of banning OHV at the SVRA.
- 48. Staff's recommendation to require a separate CDP for every special event also is designed to eliminate those special events. Given the long lead time obtaining a CDP requires, such a requirement amounts to a ban on all special events at the SVRA.
- 49. The Commission staff also demands a ban on night-time OHV as another step toward a total ban on OHV. This is another example of the bias that Commission staff holds against OHV. Commission staff readily ignores impacts on sensitive species from the dust control program, but then alleges that night-time driving causes "extreme disturbance" to sensitive species. Yet, when explain that alleged disturbance, staff suggests that it is only a "potential" disturbance. There is no hard evidence that night driving at Oceano Dunes creates any significant impact. The Commission cannot base its conditions on generalized assertions. It must present data that shows that species at Oceano Dunes are being impacted in some significant way. See Surfside Colony v. Cal. Coastal Com (1991) 226 Cal.App.3d 1260, 1262 [court held the Commission lacked "substantial evidence" when it made general assertions rather than providing site specific evidencel. 1. Staff ignores the strong correlation of night-time OHV and its benefit in deterring nocturnal predation of sensitive species.
- 50. Commission staff asserts that the La Grande Tract is buffer under the LUP and OHV is not allowed. <u>This is false</u>. County Planning officials have recognized that the Figure 4 "buffer" map in the LUP is contradicted flatly by the text of the LUP. California law is that the text supersedes any graphic depictions or maps. In addition, County Staff has stated that the Figure 4 map is in error and should be corrected.
- 51. Commission staff acknowledges that the County's position is that Figure

4 of the LUP which shows the La Grande Tract as "buffer" rather than for OHV use was "background information and advisory, but not regulatory or a critical component of the LCP." Indeed, the text of the LUP states expressly that OHV is allowed in a large portion of the La Grande Tract. The Commission asserts that Figure 4 was included intentionally to reflect the long-term goal of the LUP. There is no evidence of this. It is simply a "spin" by Commission staff. Further, the Commission has no authority to tell the County what the County's LUP means. The Commission exceeds its authority in attempting to do so. The Coastal Act leaves it up to the County to decide what's in its LUP. The Commission doesn't get to decide. San Diego Unified Port Dist. v. California Coastal Com. (2018) 27 Cal.App.5th 1111, 1134 ["The act . . . leaves wide discretion to a local government not only to determine the contents of its land use plans, but to choose how to implement these plans.].) Also, from a practical perspective, the Commission's interpretation was created decades after the adoption and certification of the LUP in 1984. Accordingly, the Commission's view has no value as legislative history and is better characterized as revisionist history if not pure fiction.

- 52. The Commission staff states: "the [LaGrande Tract] LCP inconsistency issue was not resolved, it remains outstanding to this day, and it would need to be resolved in any Coastal Commission and/or San Luis Obispo County action related to use of that property by OHVs, including through any such action on a CDP amendment, LCP amendment, or a PWP." Since the Commission is not proposing that OHV be banned at the LaGrande Tract now, there is nothing for Friends to challenge at this time.
- 53. The Commission admits that the LaGrande Tract has been used for OHV recreation since 1982, or nearly 40 years. The public's OHV use over such a long period of time has created a prescriptive easement in the public trust for public recreational use.
- 54. Commission staff comments that State Parks doesn't "even own" the LaGrande Tract are irrelevant. "State vehicular recreation areas consist of areas selected, developed, and operated to provide off-highway vehicle recreation opportunities." State law doesn't require state ownership in order for lands to be part of an SVRA. Pub. Resources Code, § 5090.43(a).
- 55. Friends has re-submitted State Parks' demurrer in the 2010 litigation regarding the LaGrande Tract. Friends re-asserts those arguments including the argument that the <u>SLO LCP is internally inconsistent</u> and therefore void.
- 56. The Commission admits that this latest action will reduce OHV riding area from 1,500 acres to 1,048 acres. That is a 452 acre reduction. That is more than a 30 percent reduction after decades of previous

reductions. It makes a mockery of the Commission's claim in 2017 that the dust program would not have significant impacts on recreational opportunities. It means that at an SVRA, the purpose of which is to provide recreational riding opportunities to the public, 70 percent of the SVRA bans OHV riding!!!!! It would be like establishing a wilderness area, but then allowing stock car racing in 70 percent of the wilderness area. It is contrary to the very purpose of the SVRA. It seems that the Ministry of Truth is at it again.

- 57. The Commission staff asserts without any evidence that "there is no lease or other arrangement for State Parks to use the La Grande property at the current time." Both State Parks and SLO County disagree with that assertion. SLO County does presently authorize State Parks to include the LaGrande Tract in the SVRA, and it does.
- 58. The Commission staff alleges that proposals by State Parks in the upcoming PWP are inconsistent with the LCP. However, the Commission has regularly asserted that it has retained jurisdiction over Oceano Dunes SVRA, in which case the certified LCP at most serves as a gnide and is not binding.
- 59. The Commission staff asserts that "... the most recent modeling indicates that even closing off 500 acres (or about 350 acres of additional OHV riding area that hasn't already been authorized by the Commission through the CDP 3-12-050 process for closure/vegetation) of existing OHV riding area may still not meet all applicable dust control reduction requirements." This is a bizarre statement. The Commission authorized dust control measures in CDP 3-12-050 in any amount and anywhere in Oceano Dunes that modeling deemed it necessary. Not only has the Commission staff muddied the waters by now claiming that CDP 3-12-500 only authorized some lower, limited acreage, but it has confused matters by regulating dust control in 2 separate permits. Which permit should be followed? Given that there is a separate dust control permit, seeking to regulate that same issue in a general Oceano Dunes permit is confusing and extremely poorly conceived.
- 60. The Commission staff proposes authorizing an array of dust control measures most of which it purported to authorize in a 2017 CDP for the dust control program. The staff's proposal to include authorization in two CDPs creates great confusion. To the extent that there is a conflict in the two CDPs with respect to dust control measures, which one prevails? Further, the authorizations do not exactly match up with the 2017 CDP, and even more confusing they don't appear to match up with the State Parks draft PMRP. Staff also would require a dust control plan. How is that related to the PMRP? Is it the same dust controls plan? Is it different and redundant?
- 61. Commission staff asserts that its "biologist" concurs that simple

- exclusionary fencing to demarcate foredune areas as off-limits to OHV use would stop dust generation at its source and should both significantly help to reduce dust at the same time as better protect sensitive coastal dune resources . . . ." But the Commission's staff biologist has no expertise in air quality matters whatsoever. As such, her views are meaningless and certainly not substantive evidence.
- 62. Commission staff also asserts that its "biologist" "confirmed the findings of previous research that found: 1) the primary source of dust is the OHV riding area within ODSVRA; 2) OHV use is the primary cause of such dust, including due to OHV-caused direction injection of fine sand particulates into the air, loss of vegetation that mitigates sand movement, and destruction of typical dune surface structure that results in a more emissive dune; and 3) replacing OHV riding areas with vegetation, or simply cordoning off such areas with fencing, can result in significant dust emission reductions." Again, she has no expertise on air quality issues. As such, her views are meaningless and certainly not substantive evidence.
- 63. The Commission staff asserts: "The dust emissions produced at ODSVRA and adversely affecting downwind communities is a serious public health issue that in some ways compels more immediate action than many of the other issues and constraints at ODSVRA, and needs effective and timely resolution in the short term." The Commission's principal charge under the Coastal Act is ensuring the conservation of coastal resources, not regulating air pollutant emissions. Air emissions are the charge of CARB and the APCD. The Commission should be focused on how the dust control measures impact coastal resources, not whether air standards are being met.
- 64. Staff asserts that "The fact is that dust control activities are also habitat protection activities that have an independent utility under the Coastal Act as well, and that also compel their application, including through the Commission's authorities associated with the base CDP review." That's bunk and biased. Staff has produced no evidence that the dust protection activities protect habitat. In fact, State Parks' EIR on the dust control program showed the opposite. Friends' biologist showed the opposite.
- 65. Staff has no expertise in air quality matters whatsoever. It makes the same mistake as the APCD in failing to account for natural background levels of dust and PM10 emissions. It ignores that wind blowing sand is how the dunes are created and maintained.
- 66. The Commission's authority over air quality matters is limited. See Pub. Res. Code § 30414. The Commission has exceeded its authority by making air quality the driving reason that it believes that OHV must be banned at an SVRA.

- 67. The CCC argues that it is authorized to regulate the "time, place and manner of public access," citing Pub. Res., Code § 30214. But the CCC can't use its "time, place, and manner" authority to effectively ban off road recreation everywhere in an SVRA that was expressly created for the purpose of off road recreation. See Pub. Res. Code § 5090, et seq. Yet, that's exactly what the CCC claims it has authority to do.
- 68. While there are no court cases interpreting the limits of the CCC's authority to impose "time, place and manner" restrictions pursuant to Pub. Res. Code § 30214, such restrictions have been construed frequently in other contexts. In the First Amendment context, the U.S. Supreme Court has ruled that the government cannot expand its "time, place and manner" authority so far as to eliminate the regulated speech. See Virginia State Bd. of Pharmacy v. Virginia Citizens Consumer Council, 425 U.S. 748, 771 (1976) ["Whatever may be the proper bounds of time, place, and manner restrictions on commercial speech, they are plainly exceeded by this Virginia statute, which singles out [drug price advertising] . . . and seeks to prevent its dissemination completely."]. Similarly, in the context of federal election law, the U.S. Supreme Court struck down a state law that wholly disqualified a candidate for Congress as because the complete ban exceeded the state's authority to impose a "time, place, and manner" restriction. United States Term Limits v. Thornton, 514 U.S. 779 (1995). Finally, the railroad rate context, the Supreme Court held the "power to regulate is not a power to destroy . . . Under pretense of regulating fares and freights the State cannot require a railroad corporation to carry persons . . . [for free]." Cotting v. Kansas City Stock Yards Co., 183 U.S. 79, 86 (1901).
- 69. Here, the CCC can't rely on a "time, place and manner" restriction to authorize the elimination of all recreational use within the 3,600-acre Oceano Dunes SVRA. That's using the pretense of regulation to ban off-roading entirely at a park statutorily authorized and specifically designated for off-road use. Thus, the CCC's unilateral expansion of the coastal development permit authority exceeds the agency's authority under the Coastal Act by failing to "protect" and "maximize" long-existing recreational resources at Oceano Dunes SVRA.
- 70. The Commission staff's proposal also violates the Americans with Disabilities Act by restricting access to the unique beach and dune access as the result of limiting or banning vehicles at Oceano Dunes. ADA, §301(7)(I) defines "public accommodation" to include "a park, zoo, amusement park, or other place of recreation." §302(a) provides that "no individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation." §302(b)(1)(A)(i) states that "It shall be discriminatory to subject an individual or class of individuals

on the **basis** of a disability or disabilities of such individual or class. directly, or through contractual, licensing, or other **arrangements**, to a **denial of the opportunity** of the individual or class to participate in or benefit from the goods, services, facilities, privileges, advantages, or accommodations of an entity." §302(b)(1)(A)(ii) states "It shall be discriminatory to afford an individual or class of individuals, on the basis of a disability or disabilities of such individual or class, directly, or through contractual, licensing, or other arrangements with the opportunity to participate in or benefit from a good, service, facility, privilege, advantage, or accommodation that is not equal to that afforded to other individuals." §302(b)(1)(A)(iii) states "It shall be discriminatory to provide an individual or class of individuals, on the basis of a disability or disabilities of such individual or class, directly, or through contractual, licensing, or other arrangements with a good, service, facility, privilege, advantage, or accommodation that is different or separate from that provided to other individuals, unless such action is necessary to provide the individual or class of individuals with a good, service, facility, privilege, advantage, or accommodation, or other opportunity that is as effective as that provided to others." §302(b)(2)(A)(ii) states it is a violation if the facility fails "to make reasonable modifications in policies, practices, or procedures, when such modifications are necessary to afford such goods, services, facilities, privileges, advantages, or accommodations to individuals with disabilities, unless the entity can demonstrate that making such modifications would fundamentally alter the nature of such goods. services, facilities, privileges, advantages, or accommodations." The ADA also requires the removal of barriers to the disabled. The unique vehicular access to the beach and the dunes at this location benefits persons with disabilities who are limited to beach and dune access elsewhere. The Commission's actions here either intentional or in effect discriminate against such persons by limiting the access in a way that particularly impacts persons with disabilities or intentionally does so. For example, this is the only park in the State Parks' system that readily accommodates persons with disabilities with beach access in the same way that persons without disabilities are accommodated. Elimination of beach driving and/or OHV will eliminate this accommodation to persons with disabilities. If the Commission closes the beach to driving, additional ADA access would need to be built. At least one beach access route must be provided for each one-half mile of beach shoreline administered or managed by the same entity. Pedestrian access points to a beach include parking facilities, dune crossings, and stairways or ramps leading from boardwalks to the beach. In high-density population areas, entities should consider providing beach access routes more frequently than the minimum of every one-half mile to prevent people with disabilities from traveling extensive distances to access the beach.

71. Staff's proposed actions are also contrary to Pub Resources Code §

30013 which bans discrimination on the basis of a disability. The unique vehicular access to the beach and the dunes at this location benefits persons with disabilities who are limited to beach and dune access elsewhere. The Commission's actions here either intentional or in effect discriminate against such persons.

- 72. One of the Coastal Act's specific goals is to maximize public recreational opportunities in the coastal zone, Pub. Resources Code, § 30001.5, subd. (c), and it contains numerous mandatory provisions toward this end, including Pub. Resources Code, §§ 30210 (recreational opportunities shall be provided), 30211 (development shall not interfere with access to the sea), 30213 (recreational facilities shall be protected, encouraged, and provided), and 30220 (coastal areas suited for recreational activities shall be protected). The Commission's proposal run counter to each of these goals since it will ban OHV and beach access and camping.
- 73. Beach driving and vehicle racing have been occurring at Oceano Dunes for more than 100 years. In fact, dune buggies were invented at Oceano Dunes. Pub. Res. Code § 5019.74 provides: "Cultural preserves consist of distinct nonmarine areas of outstanding cultural interest established within the boundaries of other state park system units for the purpose of protecting such features as sites, buildings, or zones which represent significant places or events in the flow of human experience in California. Areas set aside as cultural preserves shall be large enough to provide for the effective protection of the prime cultural resources from potentially damaging influences, and to permit the effective management and interpretation of the resources. Within cultural preserves. complete integrity of the cultural resources shall be sought, and no structures or improvements that conflict with that integrity shall be permitted." Oceano Dunes has great cultural significance for California and OHV history. Pub. Res. Code § 5019.74 mandates that it be preserved as such.
- 74. The Commission may not approve these changes to the CDP because they require actions by State Parks that require compliance with CEQA by that agency and **State Parks has not undertaken such a CEQA review**. For instance, the changes include purported authorization to add 350 acres of dust control measures and State Parks hasn't even held a scoping meeting for the EIR required for such a program.
- 75. The Commission's proposals and the Executive Director's implementation of those proposals violate the federal Endangered Species Act. (See 60-day notice letter.)
- 76. The Commission's proposed actions are inconsistent with the General Plan for Oceano Dnnes promulgated by State Parks.
- 77. State Parks acknowledges in its 2017 EIR that any dust control measures

located within the open riding area would adversely affect public access and recreation resources. (Draft EIR, p. 2-31.) State Parks sought to plant the new veg. islands outside the riding area "to the maximum" extent feasible." (Id.) State Parks considered an alternative project scenario that called for larger vegetation island area, and greater vegetation within the riding areas. (Id.) The alternative project also would increase the acreage covered by temporary dust control measures. (Id.) The Commission uses a metric of 100 acres of land permanently removed from OHV riding and planted with vegetation, and simultaneously seeks to expand that acreage substantially to accommodate the APCD's desires. But, as State Parks concluded in its EIR, expanding the acreage and dust control measures in the way demanded by the APCD will result in much greater environmental impacts, including impacts to coastal resources which the Commission is charged with protecting. This same analysis applies to the temporary dust control measures which the Commission also seeks to expand. The Commission further falsely asserts that restricting public access by foreclosing use of more than 100 acres is allowable under the Coastal Act because it is merely regulating the time, place and manner of access, depending on the "capacity of the site to sustain use and at what level of intensity." (Staff Report, pp. 4 and 28.) State Parks did not propose the dust control program because there is some issue regarding the "capacity of the site to sustain use." There is no evidence whatsoever in the record (much less substantial evidence) that the dust control program is intended to sustain use or capacity. Rather, it is intended to mitigate the effects of dust on surrounding areas. Nor is there any evidence that the dust control measures have been proposed to mitigate the "fragility of the natural resource." The Commission also suggests that the prohibition of riding in these areas is necessary to preserve the resource, (Staff Report, p. 28), but there is nothing in the record to support that contention either. As noted the vegetation islands are likely to create deep depressions (as historically has been the case), which is exactly the opposite of preserving and protecting the dune resource.

- 78. The Commission also wholly ignores the drastic reduction in riding are that has occurred since the 1970s. Figure 4-1 in State Parks' EIR shows this graphically. The riding area has been reduced by more than 10,000 acres. Since 1981, the riding area has been reduced by 91 percent or more. The Commission fails to consider that those two square miles must service nearly two million visitors per year. Given this level of visitation by off-roaders, and given that this is the single most visited park in the entire California park system (OHV or non-OHV), there is no basis to argue that this reduction is "minor," or that two square miles is adequate under the Coastal Act.
- 79. The Commission also appears to ignore State Parks' thresholds of significance analysis without any basis. (Draft EIR, pp. 4-20 and 4-22.)

80. In determining whether the Dust Control Program would substantially limit, reduce, or interfere with established recreational activity, State Parks considered the following factors: the recreational history of Oceano Dunes SVRA; the number of visitors that could be affected by a change in established recreational opportunities; the extent to which changes to established recreational opportunities would be perceptible to visitors; the ability of visitors to use similar facilities instead of Oceano Dunes SVRA; the legislative mandate and mission of the OHMVR Division. The Commission fails to refute this standard or this analysis. Using this standard, State Parks determined that under either its proposal, or the larger APCD proposal (alternative scenario), "closure of land inside the Oceano Dunes SVRA open riding and camping area" is "a potentially significant impact on OHV recreation." (Draft EIR, p. 4-24.) In compliance with Public Resources Code § 5090.35 regarding monitoring and protecting wildlife resources, State Parks also adopted SPRs that would avoid or minimize the potential adverse biological resource effects of the Program including: Designing and implementing the Dust Control Program "to disturb and occupy as little land as possible." (Draft EIR, p. 7-17.) The Commission ignores these discounts or ignores these findings with little or no data that contradicts State Parks. The Commission also ignores the EIR finding that the expanded alternative would result in greater impacts to public access and recreational lands, including impacts to the "Sand Highway." (Draft EIR, p. S-9.) The Commission's misanalysis is worsened because the Commission completely rejects State Parks' proposed mitigation for impacts to recreation and public access. It basically throws out State Parks finding that the significant impacts to this resource can only be mitigated through mitigation measure REC-1 (putting aside State Parks' further conclusion that the mitigation may not be enough to address these impacts). (Draft EIR, pp. 4-24 and 4-25; and Final EIR, pp. 3-1, 3-2 and 3-17.) The Commission is wrong and its analysis is a prejudicial abuse of discretion. The Commission has argued that mitigation is unnecessary because both the preferred and alternative scenarios are consistent with the Coastal Act standards for public access and recreation areas. As explained above and herein, the Commission's conclusion is erroneous, contrary to law, unsupported by substantial evidence, a prejudicial abuse of discretion, ignores basic information and facts, and rejects State Parks' standard of significance without any support or argument. The Commission's action is particularly egregious because State Parks concluded that "even with the implementation of Mitigation Measure REC-1, the potential remains for the Dust Control Program (in Year 5) to temporarily (43 acres) and permanently (70 acres) limit and interfere with OHV recreation at Oceano Dunes SVRA." (Draft EIR, p. 4-25.) As the EIR further concluded: "Factors such as the SVRA's history of use, historical reduction in vehicle recreation lands in the area, current seasonal reduction in vehicle recreation lands, high visitor attendance levels, and the unique, low-cost nature of the coastal

recreational opportunities provided by the SVRA make this loss of OHV lands a substantial and adverse change to OHV recreation at Oceano Dunes SVRA. Thus, Impact REC-1 would be a significant and unavoidable impact of the Dust Control Program. In addition, the proposed Dust Control Program would contribute to a significant and unavoidable cumulative impact on coastal vehicular recreation lands, as described in Chapter 11, Cumulative Impacts." (Id.)

- 81. The Commission fails to consider the cumulative impacts of reducing the riding area, beach camping and linear beach access over time, i.e., the variety of conservation measures have reduced the riding area by more than 10,000 acres since the 1970s.
- 82. The Commission failed to consider adequate alternatives to its proposal of severely reducing riding or banning OHV completely. The Commission violates the Coastal Act by allowing such a large impact to public access and OHV recreational use.

\*\*\*

Friends previously submitted a large amount of documentation in response to the proposed dust control program and the CDP that was issued in September 2017. Since this permit appears to include the same or similar dust control measures, Friends incorporates all of the materials submitted in the previous dust CDP in the record before the Commission on this CDP. Please include those materials in this record.

I am also including a couple of boxes of back up documentation supporting Friends arguments herein. Those will be delivered to the Santa Cruz office no later than Tuesday, July  $9^{th}$ .

Jim Suty, President of Friends, also will submit separately additional materials on a CD to be included in the record. You should receive that Monday, July 8th, by overnight mail.

Sincerely,

/s/

Tom Roth



Jim Suty, President 15131 Garcal Drive San Jose, CA 95127 805-994-9309 E-mail: jim@occanodunes.org www.occanodunes.org

July 5, 2019

Dan Carl, Central Coast District Director Susan Craig, Central Coast District Manager Kevin Kahn, Central Coast District Supervisor California Coastal Commission Central Coast District Office 725 Front Street, Suite 300 Santa Cruz, CA 95060

Re: Please accept this CD as supplemental information in support of the Friends of Oceano Dunes response to the July 11, 2019 California Coastal Commission Meeting Agenda Item 12.a (CDP No. 4-82-300 Review)

Dear staff:

We are providing this CD as additional information in support of Friends of Oceano Dunes.

Sincerely,

Jim Suty

President - Friends of Oceano Dunes

CC: Tom Roth, Attorney

FRIENDS Board of Directors



3944 STATE STREET, SUITE 310, SANTA BARBARA, CA 93105 USA PHONE: (805) 898-2000 • FAX: (805) 898-2211

# Alternative Access Study OCEANO DUNES STATE VEHICULAR RECREATION AREA



## November 15, 2006

### Prepared By

Elihu Gevirtz, Jennifer Jackson, Steve Junak, Robert Gibson, Vince Semonsen, Nadine Martins, Chris Bersbach, and Bernhard Preusser

With the Assistance Of Penfield and Smith

**Prepared For** 



Oceano Dunes District 576 Camino Mercado, Arroyo Grande, CA 93420 (805) 473-7230

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**Prepared For** 



State of California
DEPARTMENT OF PARKS AND RECREATION
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## **ABSTRACT**

Condor Environmental Planning Services, Inc., under contract to California State Parks prepared this Alternative Access Study of the Oceano Dunes State Vehicular Recreation Area. This California State Park is located in southwestern San Luis Obispo County, California, encompassing 3,854 acres of land west of U.S. Highway 1, between Oceano and Guadalupe-Nipomo Dunes National Wildlife Refuge.

Presently, there are two paved roads providing vehicular public access to the beach; these are Grand Avenue and Pier Avenue at the north end of the park. In addition to these existing access corridors, six potential access corridors were evaluated. These include three at the north end: Ocean Street, Creek Road, and Silver Spur Place. All three would have access from Highway 1, and all three would include widening and paving the north and/or south levees along side Arroyo Grande Creek. Two options for construction of a bridge on the beach were also developed and considered.

Three alternatives were evaluated at the southern end of the park: ConocoPhillips, Little Oso Flaco Lake, and Oso Flaco Lake. All three would have access from Highway 1. The ConocoPhillips Alternative would utilize an existing paved road from Highway 1 to the Oil Refinery. An at-grade crossing of the railroad would be constructed, and a paved road would be constructed through vegetated dunes on the ConocoPhillips property, to the unvegetated dunes of the State Park. A parking lot would be built at the top of the dunes. All terrain vehicles or walking would be required to access the beach. The Little Oso Flaco Lake and Oso Flaco Lake Alternatives would necessitate reconstruction of Oso Flaco Road. The Little Oso Flaco Lake Alternative would involve construction of a second road across agricultural land and Little Oso Flaco Lake, as well as vegetated dunes to reach the ConocoPhillips Alternative. Estimated construction costs for the alternatives range from \$455,000 to \$3,766,000, and annual maintenance costs are estimated to range from \$11,000 to \$71,000 per year.

Botanical and wildlife surveys were conducted between September 2005 and June 2006. A total of 280 species of plants and 146 species of animals were documented. These include 10 endemic plant species, 13 sensitive plant species, and 15 sensitive animal species. Archaeological surveys were conducted in January 2006, identifying or confirming 32 prehistoric and historic archaeological sites. The biological and archaeological ground surveys were limited to the areas of the park that would be impacted by the alternative access roads.

The study includes a Geographic Information System (GIS) and analyses of environmental impacts and recommended mitigation measures for biological and archaeological resources, water quality, traffic, air quality, noise and visual resources. A policy consistency analysis and sensitivity ranking for each alternative are also provided. The study concludes that continued use of the Grand Avenue and Pier Avenue is the environmentally preferred alternative.

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# I. ACKNOWLEDGEMENTS

The authors express their gratitude to the following persons and organizations for their contributions to this work: California State Parks, San Luis Obispo County, the Land Conservancy of San Luis Obispo, Ecosystems West, Andrew Zilke, Ronnie Glick, Dennis Doberneck, Laura Gardner, Bob Stafford, Paula Hartman, Doug Rischbieter, Doug Pike, Zev Labinger, Stephanie Wald, Anthony Spina, Tom Edell, Mark Holmgren, Paul Collins, Morgan Ball, Tim Hovey, Lee Ann Comrack, JoAnn Iwanicha, Richard Priestaf, Sam Sweet, Ken Chapman, Connie Rutherford, Barry Roth, Mike Caterino, Bruce Lund, Philip Hines, Julie Schneider, Liz Rogan, Mike Walgren, Zachary Bradford, Mark Skinner, Daniel Bohlman, and John Southwick.

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# II. INTRODUCTION

# A. Site Description

## **Location**

The Oceano Dunes State Vehicle Recreation Area (SVRA) is located in southwestern San Luis Obispo County, California (Figure 1). This California State Park is located along the coast of the Pacific Ocean, approximately 12 miles south of the City of San Luis Obispo, and adjacent to the "Five Cities": Shell Beach, Pismo Beach, Arroyo Grande, Grover Beach, and Oceano. The SVRA is bordered on the north by the non-vehicular section of Pismo State Beach, on the south by Guadalupe-Nipomo Dunes National Wildlife Refuge, on the east by Oceano and the City of Grover Beach, and on the west by the Pacific Ocean (Figure 2).

The Oceano Dunes SVRA encompasses 3,854 acres that stretch along 7.41 miles of coast line.¹ Of the 3,854 acres contained within Oceano Dunes SVRA, approximately 2,547 acres are owned by California State Parks and managed by the Off Highway Motor Vehicle Division (including the 800 acre Oso Flaco Lake Natural Area); 616 acres are owned by the County of San Luis Obispo and leased to State Parks; 657 acres are owned by Tosco Corporation (ConocoPhillips) and leased to State Parks; and 11 remnant parcels totaling 34 acres are still owned by Union Oil of California. Adjacent to the SVRA, is the 713-acre Pismo Dunes Natural Preserve that is part of Pismo State Beach. The Pismo Dunes Natural Preserve is not a part of the Oceano Dunes SVRA (Figure 3).

The park includes 7.41 miles of beach and 1,637 acres of sand dunes that are open to riding by off-highway vehicles (Photo 2) (California Coastal Commission 2001). The SVRA includes 1,637 acres of land in the riding area, 105 acres in the day use only area, and 2,093 acres excluded from riding. In addition, 292 acres are closed seasonally to protect Western Snowy Plover and California least tern during the nesting season.

## Adjacent Land Uses

Along the SVRA's northern end, retail establishments (Photo 1), commercial campgrounds and suburban residential land uses characterize the eastern border. Further south, adjacent land use is characterized by the small, rural, Oceano airport and sewage treatment facility, agricultural fields, agricultural support industry (packing, trucking, and refrigeration units), the ConocoPhillips oil refinery, and additional agricultural fields adjacent to Oso Flaco Lake Natural Area. The 2,550 acre Guadalupe-Nipomo Dunes

<sup>&</sup>lt;sup>1</sup> This number and the following numbers are based on measurements taken with the Geographic Information System, but should still be regarded as approximate since boundaries of some management areas were provided to Condor as hand drawn lines on maps. In addition, the County parcel data is largely correct, but displays a discrepancy at the southern boundary of the SVRA. While the map in this document portrays ownership of this area accurately, the database acquired from the County is incorrect with regard to that southerly parcel. Therefore, these acreage figures should be considered reasonably accurate, but approximate.

National Wildlife Refuge lies to the south of the Oso Flaco Lake Natural Area, and is owned and managed by the U.S. Fish and Wildlife Service.



**Photo 1:** Commercial development at the end of Pier Avenue entrance. January 2006. *Photo by Elihu Gevirtz*.



**Photo 2:** Activity in OHV riding area July 4, 2005. *Photo by Chris Bersbach.* 

INSERT FIGURE 1-Project Region

INSERT FIGURE 2-Project Site

INSERT FIGURE 3-Land Ownership and Management

# B. Purpose of Alternative Access Study

The primary purpose of this study is to identify alternative routes for motorized vehicles to access the vehicle riding area within the Oceano Dunes SVRA that avoid crossing Arroyo Grande Creek at the beach, and to evaluate the environmental impacts of these alternatives. The second objective of this study is to identify and assess alternative equestrian routes to and from the beach.

# C. History of Oceano Dunes State Vehicular Recreation Area

## **History and Visitation**

Oceano Dunes SVRA has been a State Vehicular Recreation Area since 1971. The Department of Parks and Recreation's Off Highway Motor Vehicle Recreation Division took over active management for the area in 1982 (California Coastal Commission 2001). Oceano Dunes is the only State Park in California where vehicles can be driven on the beach (California State Parks 2005) and was visited by approximately 2,076,000 people in 2005 (D. Bellman pers. comm. 2006). The number of street legal vehicles admitted to the park in 2005 was 335,656 and the number of OHV vehicles was 216,256 (D. Bellman pers. comm. 2006). Holiday weekends show higher rates of visitation than the other times of year. For example, Memorial Day Weekend 2004 saw an estimated 60,000 visitors to the park. Not all vehicles entering the SVRA participate in OHV activities. Other recreational opportunities include swimming, fishing, surfing, and picnicking, among others. Vehicles entering the SVRA from the current Grand and Pier Avenue entrances must drive on the beach and through Arroyo Grande Creek to access the designated OHV use and camping areas.

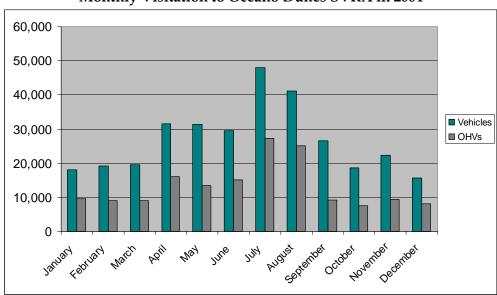


Chart 1
Monthly Visitation to Oceano Dunes SVRA in 2004

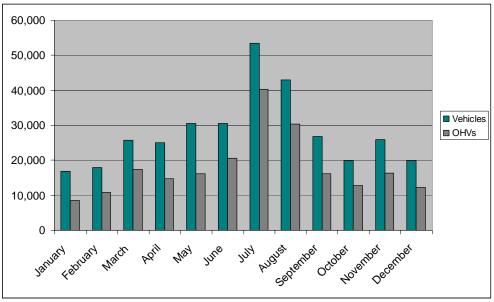


Chart 2 Monthly Visitation to Oceano Dunes SVRA in 2005

\* Visitation information includes visitors who drive and walk onto the beach from the current Grand Avenue and Pier Avenue entrances.

## **Limits on Vehicles and Campsites**

In 1982 the California Coastal Commission approved a Coastal Development Permit for habitat fencing and entrance kiosks at Oceano Dunes SVRA. This permit and its subsequent amendments also established limits on the number of vehicles and campsites allowed at the park as well as requiring ongoing review to ensure that management of off highway vehicle recreation at the site is consistent with protection of the dune habitat (California Department of Parks and Recreation 2005). Amendments made to the Oceano Dunes Coastal Development Permit by the California Coastal Commission in 2001 established new interim vehicle limits for the park. The limits for day use are no more than 2,580 street-legal vehicles and 1,720 off-highway vehicles. The camping limit is 1,000 camping units per day (California Coastal Commission 2001). In March 2003, the Coastal Commission decided to allow the park's operating permit to remain in effect (California Department of Parks and Recreation 2005).

While street legal vehicles are allowed to operate on the beach from Pier Avenue south to the fenced boundary of the Oso Flaco Lake Natural Area, off highway vehicle use and operation is allowed only on the beach from a point approximately one half mile south of Arroyo Grande Creek to the boundary of the Oso Flaco Lake Natural Area and upon much of the immediately adjacent non-vegetated sand dunes (Figure 3).

## Wildlife Habitat Protection Program

Legislation passed in 1987 requires all SVRAs to establish both soil loss standards and wildlife habitat protection programs (WHPP). The Oceano Dunes SVRA WHPP was created by Dr. Michael Kutilek and was used to collect the baseline data for the park's

habitat monitoring system. Dr. Kutilek conducted a comprehensive baseline survey of the park's flora and fauna in 1989 and 1990. Additional vegetation surveys were conducted in 1994 by Professor V.L. Holland (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003). In 2003 it was estimated that approximately one third of the park's budget goes to protecting wildlife and related habitat (California Department of Parks and Recreation 2005).

#### Habitat Conservation Plan

A Habitat Conservation Plan (HCP) for all of the State parks in San Luis Obispo County, area including the Oceano Dunes SVRA, is currently being drafted by the California Department of Parks and Recreation (CDPR). The Habitat Conservation Plan (HCP) is part of a conservation effort initiated by the CDPR to protect, conserve, and restore the natural resources of the coastal State Park units in San Luis Obispo County. CDPR has numerous holdings within San Luis Obispo County that are managed from two separate operational districts: the San Luis Obispo Coast District and the Oceano Dunes District. These Districts encompass large sections of the central California coastline, extensive watersheds, and upland terrestrial environments.

The HCP focuses on several park units in the Estero Bay area of San Luis Obispo County administered by the San Luis Obispo Coast District (Estero Bluffs, Morro Strand State Beach, Morro Bay State Park, Montaña De Oro State Park) and on Pismo State Beach (Pismo Creek and the Pismo Dunes Natural Preserve sections only) and Oceano Dunes State Vehicular Recreation Area (ODSVRA), both administered by the Oceano Dunes District. While the six park units protect relatively large tracts of open undeveloped wild lands, they are set within a geographic context of urban development typical of the California coast.

Although the HCP is designed to provide habitat level protection and management, the primary goal of this effort is to reduce or eliminate human related impacts to key threatened or endangered wildlife (P. Hartman *pers. comm.* 2006). The species covered by the HCP are the western snowy plover, California least tern, California red-legged frog, tidewater goby, Morro shoulderband snail, and ten state- and federally-listed plant species. The protection and management actions implemented for these "covered species" will benefit a host of other plant and animal species that occupy the same habitats.

The HCP describes the measures the CDPR will undertake to avoid, minimize, and mitigate specified visitor and park operations impacts to the covered species. Consistent with CDPR's mission, the HCP is designed to accommodate recreational use within the covered parks while protecting and benefiting numerous populations of threatened and endangered species that occur within those parks. Covered activities fall into five broad categories: Park Visitor Activities, General Park Maintenance and Operations, Natural and Cultural Resource Management, Special Projects, and Special Events. Most of the covered activities are ongoing and do not represent a change in park operations.

The conservation program outlined by the HCP will be the basis for issuance of an incidental take permit pursuant to the provisions of Section 10 of the federal Endangered Species Act (ESA) by the U.S. Fish and Wildlife Service (USFWS). The HCP will establish

acceptable levels of incidental take of the covered species, which may occur as the unintended result of the activities of park visitors and/or park staff (P. Hartman *pers. comm.* 2006).

Implementation of the HCP will be directed by the San Luis Obispo Coast District Superintendent for all covered Park Units within that District and by the Oceano Dunes District Superintendent for Pismo State Beach and ODSVRA. District Superintendents are directly responsible for all activities that take place within their Districts. They prepare annual operating budgets, request funds for special projects, direct staff, prioritize work loads, and direct public access and use of beaches and parks.

# D. Summary of the 1991 EIR

In 1991, California State Parks prepared an Environmental Impact Report (EIR) in order to identify the least environmentally damaging entrance corridor to the Pismo Dunes State Vehicle Recreation Area (now known as the Oceano Dunes State Vehicle Recreation Area) (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 1991). The EIR was intended to satisfy the conditions imposed by the California Coastal Commission as part of the issuance of Coastal Development Permit #4-82-300. The 1991 EIR evaluated most of the same alternatives that are evaluated in the present study, as described below. In the intervening 15 years, a number of species have been listed as threatened or endangered, and other conditions have changed that warrant a reconsideration of these alternatives. A summary of the findings of the 1991 EIR are presented here.

#### Grand Avenue

At the time of the 1991 EIR the Grand Avenue Alternative ran through completely developed land, mostly commercial and residential, between Highway 101 and Highway 1 and through mostly undeveloped land from Highway 1 to the park entrance (p.III-2). Grand Avenue was described as an undivided four-lane road from Highway 1 to the beach (p.IV-4) and was the northernmost of the proposed alternatives (p.III-1). Once in the park visitors drove south along the beach for approximately two miles to reach the offroad recreation area (p.III-1).

This alternative was already in use and was found to be the preferred access alternative as it would have had no significant impacts on any of the considered resources and would not have required any mitigation for continued use or slight expansion (p.I-1).

#### Pier Avenue

Pier Avenue was developed through commercial and residential areas of Oceano and was described in the 1991 EIR as being shorter than the other alternatives (p.III-2). Once visitors were in the park they drove approximately one mile south along the beach to the staging area (p.III-2).

Pier Avenue was described as an undivided two-lane road from Highway 1 to Lakeside Avenue and an undivided four-lane road for the remaining distance from Lakeside to the beach (p.IV-6). At the time of the EIR, plans were being made to widen the two-lane section (p.IV-6). The Pier Avenue access alternative was located north of the SVRA and was already in use at the time (p.III-2).

The 1991 EIR found that this access alternative had no significant impacts on considered resources (p.I-4) and would have required no mitigation for continued use or slight expansion (p.I-5). The only possible exception to this was potential impacts on subsurface archaeological artifacts if the alternative was expanded, but the effect were not expected to be significant so long as any expansion activities were properly monitored by a cultural resource specialist (p.VIII-6).

## Railroad Avenue\*

According to the 1991 EIR, the Railroad Avenue Alternative would have involved turning west onto Railroad Avenue, a paved two-lane road, from Highway 1 and following it for less than a quarter mile, turning south onto Creek Road, an unpaved two-lane road, for less than a quarter mile, turning southwest and passing through a fallow field, and proceeding west along the top of the Arroyo Grande Creek levee the rest of the way to the beach, where there would have been a bridge going over Arroyo Grande Creek, and then proceeding south along the beach to the staging area (p.IV-6).

The Railroad Avenue Alternative was farther south than Grand and Pier Avenues, but would still have been located in the northerly portion of the SVRA. This access alternative was directly adjacent to the Dunes Preserve (p.IV-6). This alternative did not have beach access (p.III-2).

Construction of this alternative would have required widening both Railroad Street and Creek Road, adding turn lanes to Highway 1, building a road through a fallow field, adding a parking lot, entrance kiosk, restrooms and administrative buildings and building a bridge over Arroyo Grande Creek (p.III-3).

The eastern section of this road would have passed through agricultural, residential and commercial areas and the western section would have run along an existing levee through areas set aside for flood control land uses (p. III-3). The southern boundary of the alternative consisted of agricultural land and the Dunes Preserve, and the northern boundary consisted of warehouses and industrial uses (p.III-3).

A substantial amount of native habitat would have been lost during the construction of this alternative (p.VI-12). The most significant impact would have occurred where the alternative would have passed through wet willow grove habitat (p.VI-13), but with mitigation this could have been reduced to less than significant (p.VI-18). Mitigation would have required a landscaping plan (p.VI-17), an elevated road to allow flooding of the willow-grove, and the purchase of additional land for preservation (p.VI-18).

<sup>\*</sup>Currently referred to as Railroad Street

This alternative was also found by the 1991 EIR to have a substantial effect on local traffic patterns (p.I-5) and to have the potential to adversely affect subsurface archaeological resources (p.I-6). It was also found to have potential land use conflicts with Oceano Airport including possible restrictions on the size and location of the staging area and administrative offices (p.I-2).

## Silver Spur Place

The Silver Spur Place Alternative would have crossed both Arroyo Grande Creek and a railroad right-of-way (p.III-4). Silver Spur Place was reached by turning south on 22<sup>nd</sup> Street from Highway 1, and then west onto Silver Spur Place. After crossing the railroad right-of-way the alternative followed Silver Spur Place approximately three-quarters of a mile before entering a field to the north and crossing to the Arroyo Grande Creek levee which the alternative would have followed to the west until it reached the beach (p.III-4). The eastern portion of the alternative was used to access a rural residential development and agricultural fields, and the western portion ran along the Arroyo Grande Creek levee (p.III-4). The northern boundary of the alternative was agricultural land and the Dunes Preserve (p.III-4). The beginning of the alternative at 22nd Street is developed commercial and residential land (p.III-4).

Construction of this alternative would have required widening 22nd Street, Silver Spur Place, and the dirt road to the levee, and adding parking, an entrance kiosk, restrooms, an administrative building, and a beach access ramp (p.III-4). This alternative would have provided substantial off-beach parking, some inland camping, and a possible second staging area (p.I-3). It might also have allowed the closing of the Grand Avenue entrance to vehicles to reduce vehicle-pedestrian conflicts (p.I-3).

The Silver Spur Place Alternative was located north of the park and east of the Dunes Preserve and had no beach access (p.III-3). The access alternative would have passed through mostly undeveloped land with some residential areas (p.III-3) and its development would have led to the loss of approximately five acres of prime agricultural land then being used as pasture (p.IV-21). Part of this alternative overlapped with the Creek Ave Alternative so many of the same impacts and mitigation requirements applied to both (p.I-6).

A substantial amount of native habitat would have been lost during the construction of this alternative (p.VI-14). The most significant impact would have occurred where the alternative would have passed through wet willow grove habitat (p.IV-15) but with mitigation this could have been reduced to less than significant (p.IV-19). Mitigation would have required the same elements as the mitigation of the Railroad Street access alternative (p.IV-18-19).

## Callender Road

The Callender Road Alternative (currently referred to as ConocoPhillips) was accessed from Highway 1 approximately one quarter of a mile south of ConocoPhillips and went west for one mile to the off-road area (p.III-4). If constructed this alternative could have included inland camping, an OHV staging area, and an administrative or interpretive

center (p.I-3). It could also have been developed for passive use activities and might have allowed the closing of the Grand Avenue entrance to vehicles (p.I-3). Callender Road was the southern most alternative, had no beach access (p.III-4) and was the only alternative that would have entered the off-road area directly (p.III-1). This alternative ran through undeveloped land for its entire length except at the railroad right-of-way (p.III-5). Construction of this alternative would have required construction of a new road from Highway 1 to the camping/staging area, construction of a camping/staging area with an administrative building and entrance kiosk, and a new road connecting the camping/staging area to the SVRA (p.III-5).

This was found to be the most environmentally damaging alternative (p.I-6) with unavoidable significant impacts to biological resources and surrounding land uses (p.I-3). Additional impacts on visual resources, traffic, and cultural resources could have been made less than significant if mitigated (p.I-3). Significant impacts would have occurred where the alternative passed through both stabilized and unstabilized dune habitats (p.VI-17). The biological evaluation of this access alternative found that biological mitigation requirements would have made this alternative economically unfeasible.

#### All Access Alternatives

For several of the considered resources all five alternative access corridors were found to have the same level of impact. These resources were soils/seismicity/geology, noise, hydrology and water quality, utilities/energy, and hazardous materials.

For the soils category it was found that there was no difference between the alternatives because they were all subject to the same geologic and seismic conditions (p.IX-3).

The 1991 EIR also found that regardless of which alternative was chosen, noise and traffic would have either remained constant or decreased (p.IX-3). The main source of noise at Oceano Dunes was found to be the revving of OHV engines, which would not have been affected by any of the alternatives and the effect of which was already decreased by the ambient noise of wind and waves at the beach (p.IX-4).

Hydrology and water quality effects were also found to be the same for all alternatives. All access corridors would have required the same amount of water for restrooms and an administrative building, and would not have encroached on any water body or seasonal drainage (p.IX-9).

While the Railroad Avenue, Silver Spur Place, and Callender Road alternatives would have required the extension of utilities it was determined that none of the alternatives would have had an adverse effect on local infrastructure and that the overall impact would have been the same for all of the alternatives (p.IX-5) and that there would have been no change in energy consumption by the park, as all of the alternatives would have had the same energy requirement (p.IX-6).

Hazardous materials use was also found to be the same for all five alternatives, with the only required hazardous materials having been cleaning solvents for the restrooms in all cases (p. IX-6).

Overall it was found that the impacts of the five alternatives fell into two groups. Grand and Pier Avenues had similarly low impacts with ratings of seven and eight points respectively (p.I-4). The other three alternatives were similar to each other in total impact. Railroad Avenue had a total of 19 points, Silver Spur Place received 20 points, and Callender Road had the greatest adverse impact with 21 points (p.I-4).

# E. Funding of this Study

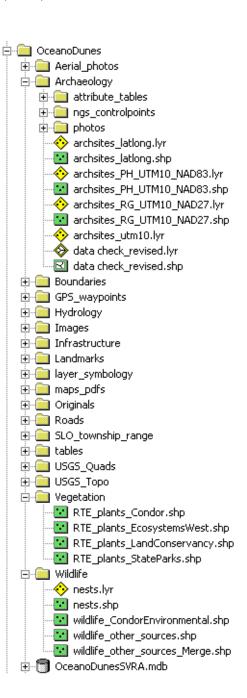
This study is funded by the Off-Highway Vehicle Program of California State Parks.

# F. Geographic Information System (GIS)

A geographic information system (GIS) was developed by Condor for Oceano Dunes State Vehicular Recreation Area. The development of a GIS specific to ODSVRA provides a "living" interactive tool containing information that is pertinent to the access alternatives in the Park. The GIS can be continually used and updated over the years and additional types of data (such as geology, hydrology, visitor use patterns, new locations of endangered species, etc) can be added.

This GIS was constructed consistent with the standards developed by California State Parks. The GIS was created in ArcGIS version 9.1 and data files are contained within a geodatabase. All of the GIS layers created by Condor are in State Plane NAD83, California Zone 5 coordinate system and datum, consistent with State Parks protocol with the exception that the units of measurement are represented in feet rather than in meters. The GIS layers are accompanied by relevant metadata files for ease of use.

The GIS incorporates previously collected information and new physical and biological information collected during this study including high resolution (1 foot) photography taken 2003, previous in biological survey biological data, archaeological survey data collected Condor in 2005 and 2006, road names, parcel ownership, etc. The image depicted on the right shows the structure of the database and some of its features.



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# II. PROJECT DESCRIPTION

## A. Access Alternatives

## **Grand Avenue and Pier Avenue**

Both Grand Avenue and Pier Avenue are existing access corridors that pass through developed commercial areas to the beach within Ocean Dunes SVRA. Pier Avenue (Photo 1), to the south, is the main entrance for Oceano Dunes SVRA, and has more commercial development than Grand Avenue. From Grand Avenue, park visitors drive south along

the beach for approximately one mile until they reach the Pier Avenue entrance, after which they continue for another 0.5 mile to the OHV riding area. The beach between Grand Avenue and the OHV area is a day-use only area.

In order to get to the OHV area, visitors must drive through the mouth of Arroyo Grande Creek (Photo 3). The signage here is multipurpose. The bulk of the year it is posted closed to motor vehicles to keep vehicles out of the pooled water areas and the Arroyo Grande Creek lagoon to avoid impacts to aquatic species. Additional signs restricting all access are added to the sign posts during the western snowy plover and California least tern



**Photo 3:** Arroyo Grande Creek Crossing at the beach. February 2006. *Photo by Elihu Gevirtz*.

nesting seasons; March through September (Figure 6) (R. Glick *pers. comm.* 2006). No construction or other physical improvements are necessary for continuation of these two existing access corridors.

# **Beach Bridges**

Two conceptual designs for a bridge over Arroyo Grande Creek at the beach have been developed for this study (illustrated Drawings 1 and 2). The objectives of these designs (also referred to as "beach bridge options") are: (1) to continue providing access to the SVRA from Grand and Pier Ave while eliminating the need for vehicles to drive through Arroyo Grande Creek between the lagoon and the tide line most of the year, (2) and to avoid the extensive road construction and environmental impacts associated with the alternative access roads described below. A combination of fencing and signed posts would continue to be utilized along the beach above the high tide line at Arroyo Grande Creek to prevent vehicle access in the lagoon in order to protect aquatic species and vehicles from being driven in nesting areas for western snowy plover. These designs are illustrated in the following drawings (Pages 29 to 49).

Two bridges would be installed parallel to each other in order to provide efficient and safe ingress and egress.

## Construction and operation of *Beach Bridge Option 1* would include:

- 1. Portable one lane bridge structure with spread footing directly on sand. Total maximum length: 30 feet; total maximum length of span above water: 20 feet. Total maximum height: 24 to 40 inches with 8 to 16 inch clearance. A second one lane bridge could be put in to place parallel to the first bridge.
- 2. This would be dragged into place.
- 3. Heavy equipment would work in the creek and would be required to be dedicated to moving the bridge and preparing the beach twice each day to accommodate the shifting creek and tide. The work of moving the bridge and preparing the beach is expected to take some time and on busy days is expected to result in significant traffic delays and backups on the beach, including the area in front of the residences on Strand Way.
- 4. It would require full-time dedicated staff to oversee and enforce traffic operation at the beach.

## Construction and operation of *Beach Bridge Option 2* would include:

- 1. Driving concrete piles into the sand at the beach until bedrock is reached. A second set of piles could be driven into the sand to accommodate a second one lane bridge parallel to the first bridge.
- 2. Pulling movable bridge sections into place and fastening them to the concrete piles.
- 3. A vehicle would be required to be dedicated to moving the bridge to accommodate the shifting creek.
- 4. It would require full-time dedicated staff to oversee and enforce traffic operation at the beach.

The location of the beach bridges would need to be adjusted to adapt to creek and tide conditions. Upon installation, all vehicles would be required to use the bridges. Control devices would have to be utilized to direct all traffic onto the bridges. The daily changes in the height of the tide preclude any practical use of fencing for this purpose. Portable traffic cones that can be relocated, coupled with full-time staff presence might be effective in channeling traffic flow, but is not practical for the 24-hour per day period that would be needed to assure compliance (D. Doberneck *pers. comm.* 2006). During periods of time in which the bridge spans might need to be relocated, access in and out of the riding area would not be possible. Thus, drivers would need to wait until the bridges were ready.

Heavy equipment work would be required to "dress" the vehicle approaches at both sides of each bridge in order to create a ramp for safe approach and departure for vehicles using the bridge. Vehicle passage both on and off the bridge ramp will mechanically erode the sand at either end of the bridge spans. During busy traffic days, heavy equipment work for the purpose of "dressing" the end-of-span ramps might be frequent. Such work would result in significant traffic backups on the beach until the bridges were ready. This is likely to include the area in front of the residences on Strand Way which may represent a land use conflict (D. Doberneck *pers.comm.* 2006).

Sand deposition and movement by wave action, high tides, stream flow, and wind driven sand would present a constant maintenance work load to assure safe and practical vehicular use of the bridges.



**Photo 4:** North Levee of Arroyo Grande Creek looking west from Creek Road September 1, 2005. *Photo by Chris Bersbach.* 



**Photo 5:** North Levee of Arroyo Grande Creek looking west from Creek Road September 1, 2005. *Photo by Chris Bersbach.* 

Although two of the three objectives would be achieved, it is unknown whether a sufficient number of vehicles would use the bridge in order to avoid the impacts as intended, given the waiting that would be involved and the open beach available to be driven upon on either side of the bridge. Furthermore, the bridge would probably have to be relocated several times per year, and often twice per day to accommodate the frequently changing location of the stream and the high tide line. In the winter and spring, the moveable bridge would have to be moved entirely out of the way of the creek so that it is not washed out to sea by a storm induced flood. The maximum distance of 20 feet over the water is not long enough to span the creek at certain times of the year. Finally, the vertical clearance of Option 1 between the beach sand and the bottom of the bridge would be a maximum of 16 inches, which may not be adequate to avoid contact with the stream during part of the year. The vertical clearance of Option 2 could be greater than Option 1, but would have permanent impacts to the beach environment.

In the opinion of a retired Park Superintendent at Oceano Dunes SVRA, the utilization of either of the beach bridge options is not practical in light of the sand and water dynamics, frequent traffic flow disruptions, high personnel costs, and the inability to keep them in place and utilized year-round (D. Doberneck *pers.comm*. 2006). Thus, these options do not appear to be viable.

#### Creek Road

The Creek Road Alternative is south of Grand Avenue and Pier Avenue. It is reached by turning west from Highway 1 onto Railroad Street, crossing the railroad tracks, and then turning left onto Creek Road. This is an unpaved road that passes alongside an agricultural field next to the north levee of Arroyo Grande Creek, which is also unpaved (Photo 4). This alternative does not currently reach the park (Figure 4B). California State Parks will not exercise eminent domain on any private property (R. Glick *pers. comm.* 2006); therefore this alternative would be contingent upon the willingness of private property owners.

After reaching the north levee of Arroyo Grande Creek, the alternative would then be on the levee (Figure 3), cross the creek on a proposed bridge (Drawing 4), and proceed along

the south levee of the creek to the beach (Figure 4B). Between the end of the south levee and the beach, the alternative would pass through part of Pismo Dunes Natural Preserve. Once at the beach south of the creek mouth visitors would travel south along the beach to the OHV area.

#### Construction would include:

- 1. Reconstruction of Creek Road to a width of 28 feet.\*
- 2. Widening the north levee to 28 feet wide and constructing a new road.\*
- 3. Construction of a new two lane concrete bridge crossing Arroyo Grande Creek at the Guiton Crossing (180 feet long, 26 feet wide and one 5 foot sidewalk).
- 4. One concrete center pier in creek bed.
- 5. New 28 foot wide road from bridge through the dunes to the beach.\*

\*For all roads, the width given is for aggregate base; with total excavation for road construction the width is 32 feet.

## **Ocean Street**

The Ocean Street Alternative is accessed from Highway 1 from Railroad Street. After passing through an area that is developed with agricultural industry support infrastructure (Photo 6), the alternative would turn south on an existing paved road along the east side of the Oceano airport, and then transition up in elevation to the Arroyo Grande Creek north levee. It would utilize the north levee (Drawing 5) until the Guiton Crossing, where it would cross the creek using a proposed new bridge (Drawing 4) to the south levee and then continue along the south side of the creek on the same path as the Railroad Street, Creek Road, and Silver Spur Place alternatives (Figure 4B). California State Parks will not exercise eminent domain on any private property (R. Glick pers. comm. 2006); therefore this alternative would be contingent upon the willingness of private property owners.



**Photo 6:** Guiton Crossing. February 2005. *Photo by Elihu Gevirtz.* 



**Photo 7:** Gate on the south levee near Guiton Crossing. 2005. *Photo by Jennifer Jackson* 

#### Construction would include:

- 1. Reconstruction of Ocean Street to the north levee to a width of 28 feet.\*
- 2. Widening the north levee to 28 feet wide and constructing a new road.\*
- 3. Construction of a new two lane concrete bridge crossing Arroyo Grande Creek at the Guiton Crossing (180 feet long, 26 feet wide and one 5 foot sidewalk).\*
- 4. One concrete center pier in creek bed.
- 5. New 28 foot wide road from bridge through the dunes to the beach.\*
- \* For all roads, the width given is for aggregate base; with total excavation for road construction the width is 32 feet.

## Silver Spur Place

The Silver Spur Place Alternative is accessed from Highway 1 by turning south onto 22nd Street, then right onto Silver Spur Place. From Silver Spur Place, the alternative goes north on an unpaved road between two agricultural fields, then west on the south levee of Arroyo Grande Creek toward the beach (Figure 4B), (Photo 8). This alternative does not currently reach the park. California State Parks will not exercise eminent domain on any private property (R. Glick *pers. comm.* 2006); therefore, this alternative would be contingent upon the willingness of private property owners.

From the south levee of Arroyo Grande Creek the alternative would travel along a closed equestrian trail that goes on the south levee toward the beach (Drawing 6). Between the end of the south levee and the beach, the alternative would pass through a portion of Pismo Dunes Natural Preserve. Once at the beach visitors would travel south along the beach to the OHV area.



**Photo 8:** South Levee of Arroyo Grande Creek from Silver Spur Place August 1, 2005. *Photo by Elihu Gevirtz*.



**Photo 9:** Pacific Dunes Ranch. August 1, 2005. *Photo by Jennifer Jackson.* 

## Construction would include:

- 1. Reconstruction of Creek Road south of the creek to 28 feet wide.\*
- 2. Widening the south levee and construction of 28 foot wide road to the Guiton Crossing.\* (A bridge would not be constructed under this alternative.)
- 3. New 28 foot wide road from bridge through the dunes to the beach.\*

\* For all roads, the width given is for aggregate base; with total excavation for road construction the width is 32 feet.

## **ConocoPhillips**

The ConocoPhillips Alternative begins at Highway 1 approximately ¼ mile south of Callender Road at the entrance to the ConocoPhillips refinery (Figure 4C). This alternative does not currently reach the park. The alternative is paved up to the refinery near the railroad tracks. An at-grade crossing would be constructed (Drawing 8). After crossing the tracks, an unpaved road would be widened and paved passing through private, mostly undeveloped land owned by ConocoPhillips and leased to California State Parks (Figures 3 and 4C) (Photo 10-13). The road crosses stabilized dunes, and passes near two of the dune lakes, Jack Lake and Lettuce Lake. California State Parks will not exercise eminent domain on any private property (R. Glick pers. comm. 2006); therefore, this alternative would be contingent upon the willingness of private property owners. The paved road (Drawing 7) would end at the top of the dunes, where a parking lot would be constructed. To reach the beach, people would need to drive vehicles capable of driving on steep unvegetated dunes, or walk. The distance to the beach at the present time is approximately 7,500 feet.



**Photo 10:** ConocoPhillips Road near where the parking lot would be located. August 1, 2005. *Photo by Chris Bersbach*.



**Photo 11:** Vegetation along the ConocoPhillips corridor. August 1, 2005. *Photo by Chris Bersbach.* 



**Photo 12:** ConocoPhillips Road. 2005. *Photo by Chris Bersbach.* 



**Photo 13:** Unvegetated dunes on the ConocoPhillips corridor. 2005. *Photo by Chris Bersbach.* 

#### Construction would include:

- 1. Reconstruction of Tosco Gate Road from Highway 1 to the ConocoPhillips oil refinery gate to width of 28 feet.\*
- 2. Construction of an at-grade crossing of the Union Pacific Railroad tracks, including installation of signals, and gates.
- 3. Construction of a new road to a width of 28 feet using the alignment of the existing sand road through the dunes.\*
- 4. Construction of a new 25,000 square foot parking lot at the end of the road on top of the dunes.

## Oso Flaco Lake

The Oso Flaco Lake Alternative is at the south end of the park and is reached by turning west from Highway 1 onto Oso Flaco Lake Road. Oso Flaco Lake Road is paved and passes through agricultural fields until it reaches the parking area for Oso Flaco Lake. A locked gate presently blocks vehicular access. Oso Flaco Lake Road would be widened and paved (Drawing 9). After reaching the parking area the dirt road (Photo 14) that is currently closed to vehicular traffic would be widened and paved past Oso Flaco Lake and through a vegetated wetland area to the dunes. A culvert would be constructed at the road's intersection with Oso Flaco Lake (Drawing 10). In the dunes area an unpaved trail passes through stabilized dunes towards the beach. The trail would be widened and paved. Once at the beach, visitors would have to travel .37 miles north along the beach, past the seasonal exclosure area to the riding area.

#### Construction would include:

- 1. Reconstruction of Oso Flaco Lake Road to 28 feet wide from Highway 1 to the parking lot.\*
- 2. Construction of an at-grade crossing of the Union Pacific Railroad tracks, including installation of signals, and gates.
- 3. Reconstruction of new road improvements to 28 feet wide from parking lot to the beach.\*
- 4. Installation of a multi-culvert crossing Oso Flaco Lake/Creek using six 48-inch diameter reinforced concrete pipes, 26 feet in width.



**Photo 14:** Road crossing Oso Flaco Lake. September, 2005. *Photo by Chris Bersbach.* 



**Photo 15:** Oso Flaco Lake corridor. September, 2005. *Photo by Chris Bersbach*.

<sup>\*</sup> For all roads, the width given is for aggregate base; with total excavation for road construction the width is 32 feet.



**Photo 16:** Vegetation along Oso Flaco Lake corridor. September, 2005. *Photo by Chris Bersbach*.



**Photo 17:** Oso Flaco Lake corridor. 2005. *Photo by Chris Bersbach.* 

\* For all roads, the width given is for aggregate base; with total excavation for road construction the width is 32 feet.

#### Little Oso Flaco Lake

The Little Oso Flaco Lake Alternative is reached by turning west onto Oso Flaco Lake Road from Highway 1. Between Highway 1 and the turnoff to Little Oso Flaco Lake, Oso Flaco Lake Road passes through agricultural fields. From Oso Flaco Lake Road, the alternative turns north through an agricultural field of row crops, and crosses Little Oso Flaco Lake widening the existing road and a new culvert (Drawing 10). On the north side of Little Oso Flaco Lake the alternative would consist of a paved road, an agricultural field, vegetated dunes, and then intersecting with the ConocoPhillips Alternative. From this point, the route would turn west and would be synonymous with the ConocoPhillips Alternative (Figure 4D).

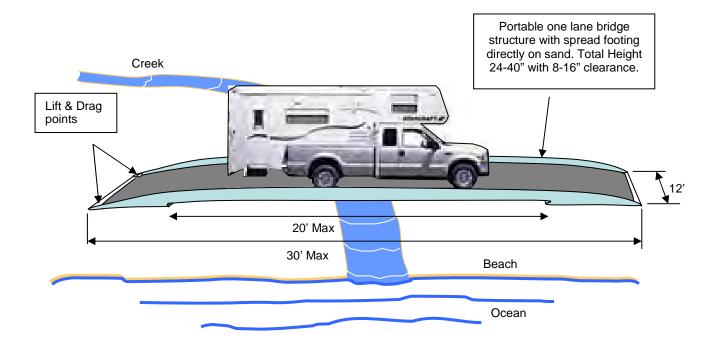
#### Construction would include:

- 1. Construction of an at-grade crossing of the Union Pacific Railroad tracks, including installation of signals, and gates.
- 2. Construction of a new 28 foot wide road from Oso Flaco Lake Road to Tosco Gate Road.\*
- 3. Installation of a new culvert crossing of Oso Flaco Creek using six 48-inch diameter reinforced concrete pipe, 26 feet in width.

<sup>\*</sup> For all roads, the width given is for aggregate base; with total excavation for road construction, the width is 32 feet.



**Photo 18:** Little Oso Flaco Lake alternative with ConocoPhillips corridor in background. June 2005. *Photo by Chris Bersbach*.



# **Beach Bridge Option 1 Movable Bridge on Beach**

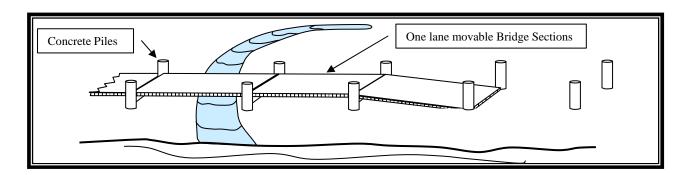
#### Notes:

- Dedicated vehicle for moving bridge required (bridge may need to be moved several times per week).
- Would require dedicated staff member to oversee operation (Place cones, enforce use, communicate need for repositioning, etc.).









## **Beach Bridge Option 2 Movable Bridge on Piles**

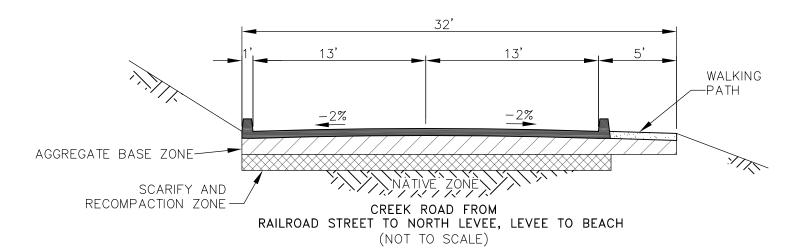
#### Notes

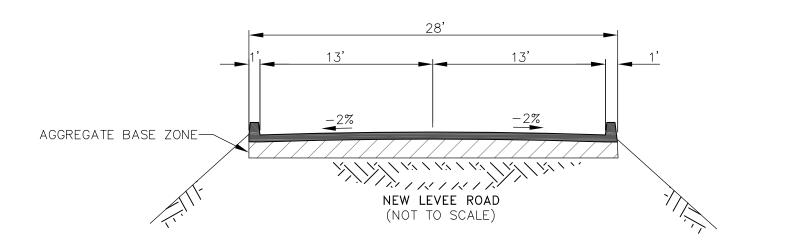
- Dedicated vehicle for moving bridge required (bridge may need to be moved several times per week).
- 2. Would require dedicated staff member to oversee operation (Place cones, enforce use, communicate need for repositioning, etc.).





## CREEK ROAD ALTERNATIVE





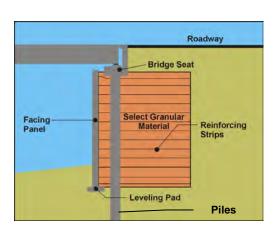


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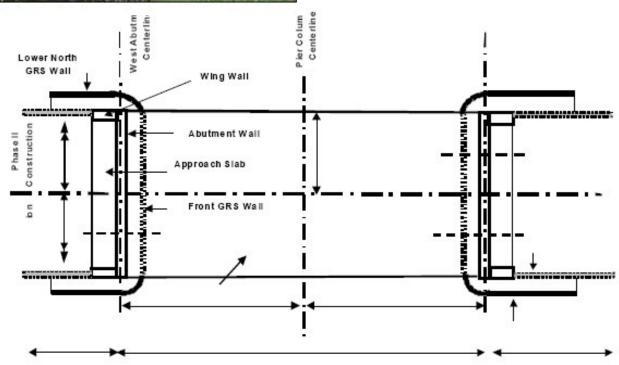
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## TWO SPAN CONCRETE SLAB BRIDGE OPTION



**Pile Abutment Detail** 



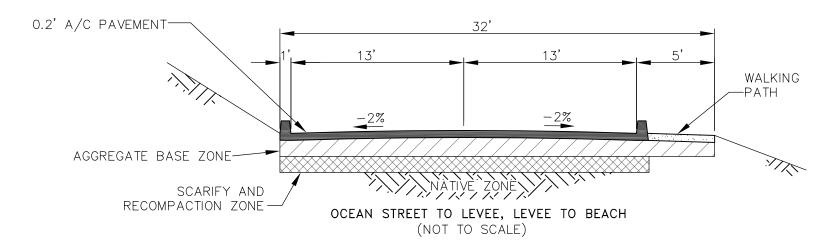


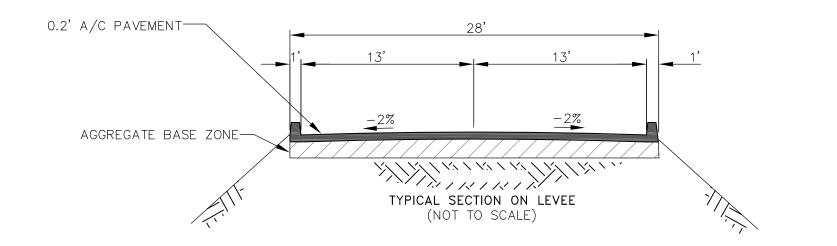
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## OCEAN STREET ALTERNATIVE



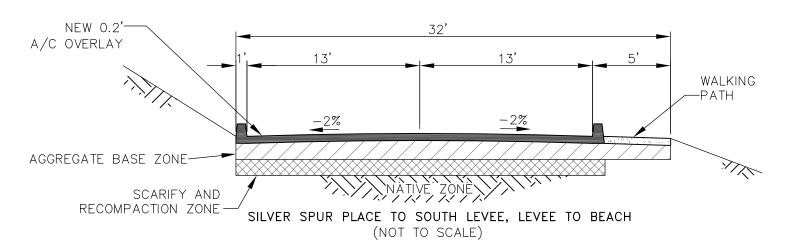


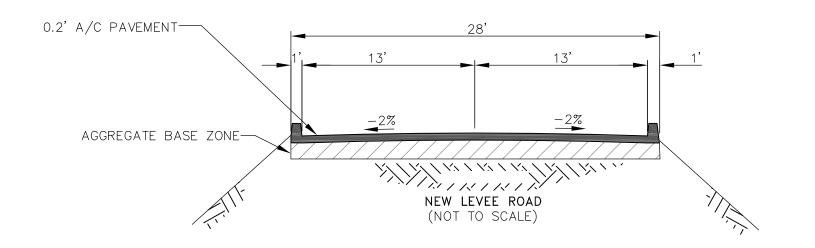


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## SILVER SPUR PLACE ALTERNATIVE



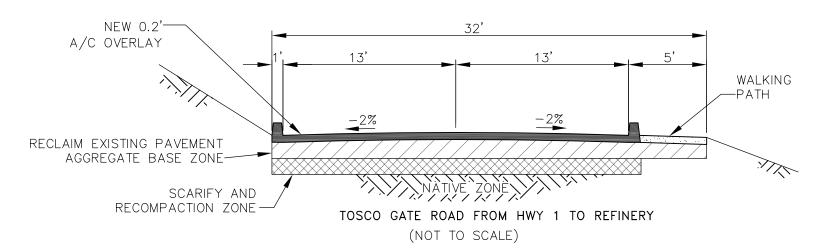


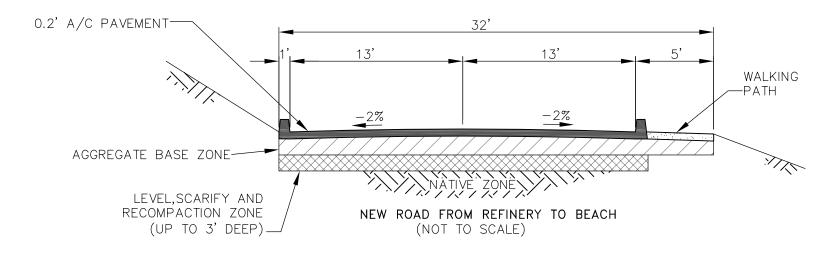


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REFERENCE: COUNTY OF SAN LUIS OBISPO ENGINEERING DEPARTMEN, TYPICAL SECTIONS RURAL, DRAWING NO. A—1a

## CONOCO-PHILIPS ALTERNATIVE

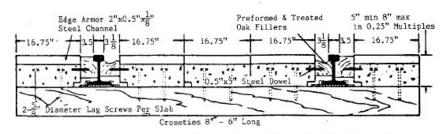




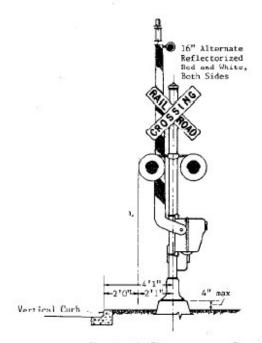


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REFERENCE: COUNTY OF SAN LUIS OBISPO ENGINEERING DEPARTMEN, TYPICAL SECTIONS RURAL, DRAWING NO. A-1a



Typical Cross Section thru Concrete Slab Crossing



Typical Clearances for Flashing Light Signals with Automatic Gates

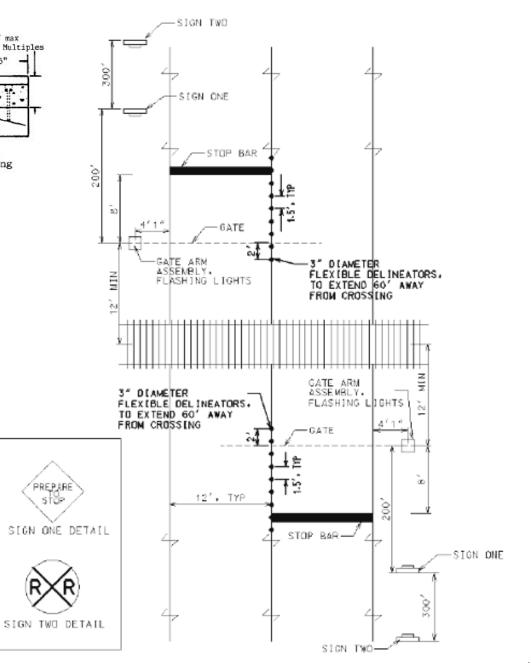


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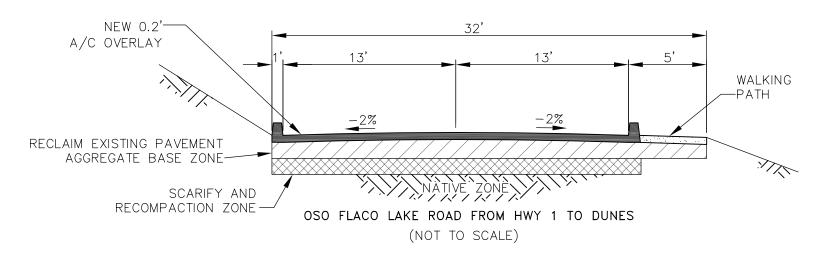
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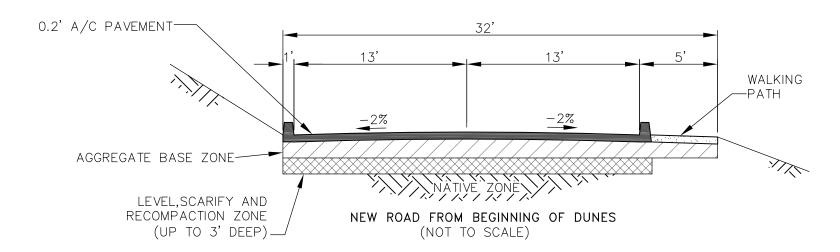
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## OSO FLACO LAKE ALTERNATIVE







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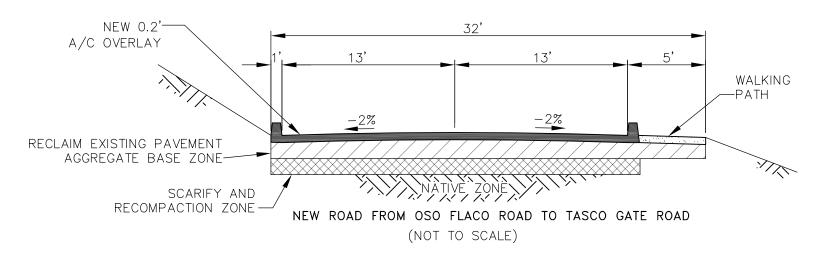


# Oso Flaco and Little Oso Flaco Alternatives Culvert Concept



NOTE: ASPHALT DIKE AND PAVED SHOULDERS TO BE INSTALLED WHERE NEEDED TO CONTROL DRAINAGE OR EROSION.

## LITTLE OSO FLACO LAKE ALTERNATIVE



REFERENCE: COUNTY OF SAN LUIS OBISPO ENGINEERING DEPARTMEN, TYPICAL SECTIONS RURAL, DRAWING NO. A-1a



## **INSERT FIGURE 4A**

INSERT FIGURE 4B

INSERT FIGURE 4C

INSERT FIGURE 4D

### III. CLIMATE, HYDROLOGY, AND WATER QUALITY

#### A. Climate

The central coast of California enjoys a Mediterranean climate with cool, moist winters and warm, dry summers. The climate is highly dependent upon proximity to the Pacific Ocean with moderate temperatures year round and fog likely from June through mid-August. Summer temperatures range from highs in the mid 60s and 70s and lows in the 50s; usually with dense morning (and sometimes evening) fog. Winter temperatures range from highs in the 50s and 60s with lows in the 40s. Rain typically falls between November and April and totals approximately 14-16 inches along the coast and higher amounts along the ridge tops (Central Coast Salmon Enhancement 2005).

Chart 3
Monthly Climate and Rain Summary for Pismo Beach, CA

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
Average Maximum Temperature (F)	63.3	64.8	66.0	68.1	68.9	70.3	70.2	71.0	72.3	72.0	68.5	64.4	68.3
Average Minimum Temperature (F)	42.4	43.9	44.4	45.6	47.6	50.3	52.3	53.2	52.7	50.3	46.7	43.0	47.7
Average Total Precipitation (in.)	3.55	3.51	2.79	1.39	0.34	0.05	0.03	0.02	0.26	0.74	1.94	2.54	17.16

Source: Western Regional Climate Center

### B. Hydrologic Setting

Nine watersheds lie within the boundaries of San Luis Obispo County, each of which are divided into smaller sub-watersheds. The two watersheds which cover the Coastal Zone of the county are the Central Coastal Watershed, from Monterey County to south of the city of Grover Beach, and the Santa Maria Watershed, which encompasses the southern part of the county and extends into Santa Barbara County (California Coastal Commission 2001). The Central Coast Watershed includes three sub-watersheds: Cambria, Point Buchon, and Arroyo Grande. Arroyo Grande Creek, lies within the Arroyo Grande Watershed. Similarly, the Santa Maria Watershed is defined by three sub-watersheds: Guadalupe, Cuyama Valley, and Sisquoc. Oso Flaco Creek lies within the Guadalupe Watershed.

#### Arroyo Grande Creek

The Arroyo Grande Watershed, at its Pacific Ocean terminus, is approximately 6 miles wide covering approximately 150 square miles including its tributaries (Tally Ho, Tar Springs and Los Berros Creeks). From the coast, the watershed extends approximately 16 miles inland (Coastal San Luis Resource Conservation District 2005). The entire watershed is comprised of 104,270 acres, of which 62,050 acres (90 square miles) are below Lopez Dam. Terrain in the watershed varies from hilly to level, ranging in elevation from 522 feet at Lopez Dam to sea level where the creek enters the ocean within the Oceano Dunes SVRA (Central Coast Salmon Enhancement 2005).

The current floodplain/active channel is 722 acres, which is greatly reduced from its historic extent in which it spread over thousands of acres of the Arroyo Grande Valley that are now farmed (Central Coast Salmon Enhancement 2005). The history, geology, hydrology and current conditions and land uses of the Arroyo Grande Creek watershed are described in detail in the Arroyo Grande Creek Watershed Management Plan prepared for the California Department of Fish and Game (Central Coast Salmon Enhancement 2005).

Release from the dam into Arroyo Grande Creek generally occurs at a rate of 100 cubic

feet per second or less. Since 1998, releases of 4 million gallons per day or 2,800 acre feet per year, have been made for the purpose of maintaining instream aquatic habitat. NOAA Fisheries is currently working on a recommendation for stream flow that will serve as the basis for guiding development of the Habitat Conservation Plan (County of San Luis Obispo 2005[a]) as it pertains to habitat requirements for steelhead trout (NOAA 2004 memo to San Luis Obispo County Board of Supervisors *in* Central Coast Salmon Enhancement 2005).

**Photo 19:** Vehicle operator unlawfully and unsuccessfully attempted to cross Arroyo Grande Creek at flood stage. Signs had been posted earlier prohibiting crossing of the creek. January 2006. *Photo courtesy of Santa Maria Times*.

#### Meadow Creek

Meadow Creek is a remnant marsh drainage system that enters Arroyo Grande Creek Lagoon just

upstream of the creek mouth at the ocean. Los Berros Creek is partially channelized and enters Arroyo Grande Creek from the south just outside of the project boundaries (Figure 3). The main stem of Arroyo Grande Creek below Lopez Dam is 12.79 miles long and consists of an incised channel from Lopez Dam at 522 feet in elevation downstream to its confluence with Los Berros Creek (Figures 1 and 2). Downstream of the confluence, the channel is slightly incised and constrained by levees on both sides, emptying into an estuary adjacent to Arroyo Grande Creek Lagoon, which is also the terminus of Meadow Creek (Central Coast Salmon Enhancement 2005).

#### Oso Flaco Creek

Approximately 12,625 acres of the Santa Maria Watershed are within the Coastal Zone of San Luis Obispo County. Guadalupe is the only sub-watershed which lies, in part, in the Coastal Zone (California Coastal Commission 2001). Oso Flaco Creek drains into Little

Oso Flaco Lake and then on to Oso Flaco Lake at the southern edge of the SVRA. Much of this portion of the watershed is used for agriculture and recreational opportunities, such as the Oceano Dunes SVRA.

#### C. Water Quality

In 2000, a Volunteer Water Quality Monitoring program was established to work in conjunction with the Regional Water Quality Control Board's Central Coast Ambient Monitoring Program (CCAMP). Numerous sites in the region are monitored monthly for conventional pollutants such as nitrate, phosphate, pH, turbidity, dissolved oxygen, water temperature, and percent saturation of oxygen. Additional pollutants that are monitored are: metals, organic chemicals (fertilizers, pesticides, insecticides, and herbicides) hydrocarbons, PCBs (industrial compounds produced by chlorination of biphenyl that accumulate in animal tissue), among other analytes, are also monitored. Appendix 7 provides selected results from these monitoring efforts.

A lingering public concern is the potential for water quality impacts caused by the existing vehicle crossings of Arroyo Grande Creek at the beach (A. Zilke, R. Glick, and D. Doberneck pers. comm. 2006). The concern, as reported to the authors, is that vehicles either: 1) crossing the creek at low flow could leak small amounts of oil or other fluids, or 2) vehicles unlawfully crossing at high flow and/or high tide when it is not permitted as illustrated in Photo 19 can get stuck and inundated in the water and topple over, thus releasing petrochemicals into the stream and the ocean. State Parks Rangers have the authority and do regulate stream crossing to avoid this scenario (California Department of Parks and Recreation 2006[a]). An evaluation of the impacts of the existing park operations is not within the scope of this study. However, State Parks notes that portions of the estuary are closed to vehicle activity, crossing the creek is required to be accomplished parallel to the ocean and as close to the ocean as possible, creek water levels are monitored and the creek is periodically closed during periods of high flow, staff responds to reports of stuck vehicles and take appropriate actions, and there are established protocols for staff vehicle crossings (R. Glick pers. comm. 2006).

The proposed alternative access corridors of Ocean Street, Creek Road, and Silver Spur Place are adjacent to Arroyo Grade Creek and lagoon, which is in the Estero Bay unit established by CCAMP. Jack Lake and Lettuce Lake are also in the Estero Bay unit. Oso Flaco Lake and Little Oso Flaco Lake Alternatives are adjacent or near Oso Flaco Lake, Little Oso Flaco Lake, and Oso Flaco Creek. These waterbodies are within CCAMP's Santa Maria unit.

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#### IV. HABITAT AND SPECIES DESCRIPTIONS

### A. Methodology

#### **Background Research**

The California Natural Diversity Database (CNDDB) (California Department of Fish and Game 2005) (Appendix 1) and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants were queried on July 19, 2005 (California Native Plant Society 2005 [online]). A project is currently in preparation that will provide an inventory of plant and animal species in the Guadalupe – Nipomo dunes based on literature reviews (J. Blecha, C. Cleveland, and D. Innis *in prep*) and a book on the distribution and occurrences of birds in San Luis Obispo County (T. Edell and C. Marantz *in prep*). Both of these sources are anticipated to provide extremely useful information.

#### **Survey Methods**

Condor Biologists Elihu Gevirtz, Vince Semonsen, Zev Labinger, and Botanists Steve

Junak and Jennifer Jackson surveyed the proposed access corridors on 17 days between September 1, 2005 and June 30, 2006 (Tables 1 and 2). Site conditions as well as plants and animals observed were noted. Ten power and eight power binoculars and potato rakes were used to find, observe and identify animals in and around the project site. Animals were noted by site, sound, tracks, and scat. Plants were identified in the field and unknown species were collected and brought back to the Santa Barbara Botanic Garden for identification. The survey effort did not include a comprehensive inventory of invertebrates, however, several species were collected and identified by experts at the Santa Barbara Museum of Natural History and other locations.

Sensitive plant and animal locations were documented using a digital camera and Garmin handheld GPS unit. GPS coordinates were imported into a GIS upon return from each site visit. Complete plant and animal lists of all species observed along the routes can be found in Appendices 2 and 3, although the reader should note that these lists do not represent complete inventories of the entire park.



**Photo 20:** Botanist on the boardwalk near Oso Flaco Lake. June 2006. *Photo by Jennifer Jackson*.



**Photo 21:** Biologists on the ConocoPhillips Corridor. April 2006. *Photo by Jennifer lackson*.

#### Table 1

Botanical Surveys 2005-2006						
Route	Date	Observers				
ConocoPhillips	September 7, 2005	S. Junak, E. Gevirtz, J. Jackson				
	May 17, 2006	S. Junak, E. Gevirtz, J. Jackson				
	June 13, 2006	S. Junak, E. Gevirtz, J. Jackson				
Creek Road, Silver Spur Place, and Ocean Street	September 1, 2005	E. Gevirtz, J. Jackson				
	April 17, 2006	S. Junak, E. Gevirtz, J. Jackson				
	June 13, 2006	S. Junak, E. Gevirtz, J. Jackson				
Oso Flaco	September 1, 2005	E. Gevirtz, J. Jackson				
	November 21, 2005	S. Junak, E. Gevirtz, J. Jackson				
	June 9, 2006	S. Junak, E. Gevirtz, J. Jackson				
	June 21, 2006	S. Junak, E. Gevirtz, J. Jackson				
Little Oso Flaco	June 9, 2006	S. Junak, E. Gevirtz, J. Jackson				
	June 21, 2006	S. Junak, E. Gevirtz, J. Jackson				

Table 2

Wildlife Surveys 2005-2006						
Route	Date	Observers				
ConocoPhillips	March 23, 2006	E. Gevirtz, V. Semonsen				
	May 1, 2006	E. Gevirtz, V. Semonsen				
	June 20, 2006	E. Gevirtz, V. Semonsen, Z. Labinger				
	June 30, 2006	Z. Labinger				
	January 7, 2006	E. Gevirtz				
	March 30, 2006	E. Gevirtz, V. Semonsen				
Creek Road, Silver Spur Place, and	April 18, 2006	E. Gevirtz, V. Semonsen				
Ocean Street	June 1, 2006	E. Gevirtz, V. Semonsen				
	June 20, 2006	E. Gevirtz, V. Semonsen, Z. Labinger				
	June 30, 2006	Z. Labinger				
Little Oso Flaco Lake	June 7, 2006	E. Gevirtz, V. Semonsen				
	June 21, 2006	V. Semonsen, Z. Labinger				
	June 30, 2006	Z. Labinger				
Oso Flaco Lake	April 18, 2006	E. Gevirtz, V. Semonsen				
	May 1, 2006	E. Gevirtz, V. Semonsen				
	June 20, 2006	E. Gevirtz, V. Semonsen, Z. Labinger				
	June 21, 2006	E. Gevirtz, V. Semonsen, Z. Labinger				

### B. Vegetation Communities

The SRVA is located in an ecological transition zone where northern and southern California biotic communities converge. Thus, several plant communities such as southern and northern foredunes communities and plant species such as giant coreopsis (*Coreopsis gigantea*) reach their southern or northernmost range limits within the project area. The plant communities at the SVRA have unique components, like Nipomo Mesa lupine (*Lupinus nipomensis*) which is restricted to the project area and the immediate surroundings; it has never been found anywhere else in the world. Two extremely rare plant species that were more widespread in the past but are now found only in the Central Coast region of California, namely marsh sandwort (*Arenaria paludicola*) and Gambel's watercress (*Rorippa gambelii*), occur in the project area. In addition, a number of other plant species that are found only in the Central Coast region are also known to occur here.

Several names for the vegetation communities in the project area have been used by various authors ranging from Holland (1986) to Sawyer and Keeler-Wolf (1995) in addition to other general classification names that have been used previously by California State Parks (1991) and Ecosystems West Consulting Group (2004). These are provided in Table 3.

Table 3
Vegetation Communities Previously Documented at the SVRA

Common Name	Holland 1986	State Parks 1991	Sawyer and Keeler-Wolf 1995	Ecosystems West 2004
Sandy Beach	not described	not described	not described	not described
Unvegetated Dunes not described		not described	not described	Open Sand
Vegetated Foredunes	ed Foredunes Southern [Northern] Foredunes		sand verbena-beach bursage series European beachgrass series	Foredunes
Vegetated Backdunes	Central Dune Scrub	Coastal Dunes	dune lupine-goldenbush series	Central Dune Scrub
Riparian Forest	Central Coast Arroyo Willow Riparian Forest	Riparian	arrovo willow series Sitka willow series mixed willow series	Riparian Forest/Woodland
Salt Marsh	not described  Northern Coastal Salt Marsh	not described	not described saltgrass series jaumea-saltgrass association	Salt Rush (Juncus sp.) Saltgrass Marsh
Freshwater Marsh	Coastal and Valley Freshwater Marsh	Freshwater Marsh	cattail series bur-reed series bulrush series bulrush-cattail series	Seasonal Cattail Marsh  Emergent Monocots
not described	not described	Open Water	not described	not described
not described	not described	not described	not described	Golden Wattle
Ag Lands	not described	Agricultural Lands	not described	Agricultural

Six Holland community types have been identified within the project area; these correspond with approximately twelve series based on the Sawyer and Keeler-Wolf (1995) classification scheme. In 1991 California State Parks produced an EIR which recognized four habitat types, while Ecosystems West documented seven native habitats. Agricultural, open water, and unvegetated dunes (open sand) types have also been described. The Manual of California Vegetation Classification (MCV) by Sawyer and

Keeler-Wolf has been adopted by the California Native Plant Society (CNPS), the Department of Fish and Game (CDFG), and State Parks as the official classification scheme to be used (CNPS 2006 [online]). Thus, we describe the vegetation using this system.

Sand-verbena - beach bursage series is most closely related to the Southern and Northern Foredunes types in the Holland (1986) classification. This community is dominated by herbaceous plants; mainly perennial forbs, grasses, and low shrubs (Sawyer and Keeler-Wolf 1995). It occurs in coastal dunes near the shoreline and was observed in all access alternative corridors on the beach, foredunes and mid dunes. Beach bursage (Ambrosia chamissonis), and beach sand-verbena (Abronia umbellata) make up the key species in this series. Associated species include California croton (Croton californicus), coyote brush (Baccharis pilularis), dune lupine (Lupinus chamissonis), mock heather (Ericameria ericoides), and beach primrose (Camissonia cheiranthifolia), all of which were observed in 2005. Beach spectacle pod, a California threatened (CT) and CNPS List 1B species (rare, threatened, or endangered in California and elsewhere), was documented in 2004 on the beach, northwest of Oso Flaco Lake, although it is more likely to occur just behind the foredunes. Surf thistle (Cirsium rhothophilum) (CT/CNPS 1B) was also documented on the shoreline, west of the vegetation island called eucalyptus south (Figure 5). CNPS List 4 (plants of limited distribution-a watch list) species in this community include, dunedelion (Malacothrix incana) and sticky sand-verbena (Abronia maritima) (observed in 2005) in the Oso Flaco Lake corridor. Introduced species such as European beachgrass (Ammophila arenaria), hottentot-fig (Carpobrotus edulis), and pig root (Conicosia pugioniformis) also occur here.

<u>Dune lupine-goldenbush series</u>, also known as Central Dune Scrub (Holland 1986), is the dominant community in the project area. It was observed extensively in the vicinity of Oso Flaco Lake vicinity, in and around the vegetated islands of the SVRA along Little Oso Flaco and the ConocoPhillips alternatives, as well as the back dunes portion of the Creek Road, Silver Spur Place, and Ocean Street alternative access corridor(s).

This series is comprised of shrubs usually less than one meter tall with an open, intermittent, or continuous canopy and occurs on stabilized central dominate this community type and backdune slopes near the coastline (Sawyer and Keeler-Wolf 1995). Dune lupine or yellow bush lupine (*Lupinus arboreus*), and mock heather or heather goldenbush (*Ericameria ericoides*) are the key species in the series and co-occur with other shrub species such as coyote brush, giant coreopsis (infrequent, but patchy), dune buckwheat (*Eriogonum parvifolium*), deerweed (*Lotus scoparius* var. *scoparius*), Blochman's groundsel or ragwort (*Senecio blochmaniae*) (CNPS List 4), and occasionally, species such as arroyo willow or California wax myrtle (*Morella [Myrica] californica*); usually occurring in groves. The federal and state endangered Nipomo Mesa lupine (FE/CE/1B) is also known to occur in this community and was observed in the ConocoPhillips alternative corridor.

Herbaceous species in this community include yarrow (*Achillea millefolium*), beach primrose, dune or indian paintbrush (*Castilleja affinis* ssp. *affinis*), cudweed aster (*Corethrogyne filaginifolia*), dune wallflower (*Erysimum insulare* ssp. *suffrutescens*) (CNPS List 4), and prostrate deerweed (*Lotus heermannii*), among others. Crisp monardella (*Monardella crispa*) occupies open areas in and around the margins of the community and

was observed in the ConocoPhillips and Oso Flaco alternative access corridors. Similarly, San Luis Obispo monardella (*Monardella frutescens*) (CNPS List 1B) was observed co-occurring with crisp monardella in 2005 in the ConocoPhillips corridor. Blochman's leafy daisy (*Erigeron blochmaniae*) (CNPS List 1B) was observed in 2005 and is known to occur in or near the margins of this community. Beach spectacle pod (CT/1B) is known to reside from the beach to just behind the foredunes and could potentially occur within this series. Therefore, it is included in this community type as well as in the beach sand-verbena – beach bursage series described above.

Non-native species such as narrow-leaved ice plant, hottentot-fig (ice plant), sea fig, ripgut grass (*Bromus diandrus*), pampas grass (*Cortaderia jubata*), and veldt grass (*Ehrharta calycina*)were observed in 2005 and 2006. Veldt grass is particularly widespread in the ConocoPhillips alternative access corridor, although the Land Conservancy of San Luis Obispo appears to be having success fighting this exotic weed (M. Skinner *pers. comm.* 2006).

Arroyo willow (and/or mixed willow series), previously described as Central Coast Arroyo Willow Riparian Forest (Holland 1986), is a commonly occurring community throughout the dunes. Trees generally less than ten meters tall dominate this community and the canopy is continuous; shrubs are sparse, and ground layer can be sparse to abundant (Sawyer and Keeler-Wolf 1995). It occurs in dense patches or groves in the vicinity of Oso Flaco Lake, Oso Flaco Creek, Little Oso Flaco Creek, and Arroyo Grande Creek, as well as, in vegetated dunes and was observed in all alternative access corridors.

Arroyo willow and red willow (Salix laevigata) dominate this community and co-occur with other species such as black cottonwood (Populus balsamifera ssp. trichocarpa), coyote brush (Baccharis pilularis), Mexican elderberry (Sambucus mexicanus), mugwort (Artemisia douglasiana), and California wax myrtle. Blochman's groundsel (CNPS List 4) is known to occur at the margins of this community or in places where the canopy is less dense. The federally listed La Graciosa thistle (Cirsium scariosum var. citrinum [loncholepis])) is known to occur at lake edges and creek banks and could potentially occur here (Figure 5).

<u>Saltgrass series</u> occurs on the northern margin of Oso Flaco Lake and at Arroyo Grande Creek Lagoon formed by Arroyo Grande Creek and Meadow Creek (separated by a tide gate) located near the end of the Creek Road, Silver Spur Place, and Ocean Street alternative access corridor(s). The saltgrass series is dominated by herbaceous plants; mainly saltgrass (*Distichlis spicata*), marsh Jaumea (*Jaumea carnosa*), and Pacific silverweed (*Potentilla anserina* ssp. *pacifica*). The Sawyer and Keeler Wolf classification scheme also mentions a Jaumea-saltgrass association which could also be present upon further investigation.

<u>Bulrush-cattail series</u> is dominated by herbaceous plants. Bulrushes (*Scirpus californicus*, *S. microcarpus*, and *S. cernuus*) and cattails (*Typha latifolia* and *T. domingensis*) are key species within the series; usually less than four meters tall, and the canopy cover can be continuous, intermittent, or open (Sawyer and Keeler-Wolf 1995). Cattail series and bulrush series could also occur independently in some areas of the project area. Cattail series was mapped in 2004 near several of the vegetated islands in the dunes and in the

vicinity of Oso Flaco Lake. Bulrush-cattail series was observed within the ConocoPhillips, Oso Flaco Lake, and Little Oso Flaco Lake alternative access corridors and lagoon near the mouth of Arroyo Grande Creek.

<u>Bur-reed series</u> is dominated by broad-fruited bur-reed (*Sparganium eurycarpum*), bulrushes and cattails. This series was originally mapped in 2004 in and around the margins of Oso Flaco Lake and Little Oso Flaco Lake, however, it was also observed at Arroyo Grande Creek Lagoon located near the mouth of Arroyo Grande Creek at the end of the Creek Road, Silver Spur Place, and Ocean Street alternative access corridor(s).

The saltgrass, bulrush-cattail, and bur-reed series were previously combined in the Holland type "Coastal and Valley Freshwater Marsh" The federally listed Gambel's water cress has been documented most recently by State Parks in 2005 near Oso Flaco Lake between the dunes and an agricultural field, Ecosystems West in 2003 on the northern side of Little Oso Flaco Lake, and J Chesnut in 1998 at Oso Flaco Lake (Ecosystems West 2004 and CDFG 2006 [online]) (Figure 5). The federally listed marsh sandwort (*Arenaria paludicola*) has been documented by State Parks in 2005 (J. Iwanicha *pers. comm.* 2006) and in two locations in 1998 (Ecosystems West 2004 and CDFG 2006 [online]) (Figure 5) near the northeast arm at Oso Flaco Lake; both species could potentially occur in other locations within the four community types listed above [*Arroyo willow (and/or mixed willow series, Saltgrass series, Bulrush-cattail series, Bur-reed series.*] The margins of Oso Flaco Lake and Little Oso Flaco Lakes in May and June 2006 were surveyed for Gambel's water cress and marsh sandwort, however, neither species was observed.

<u>Open Sand</u>. Over 90% of the riding area is open sand (Ecosystems West 2004) and several species are able to colonize within this habitat such as branching phacelia (*Phacelia ramosissima*), sea rocket (*Cakile maritima*), beach saltbush (*Atriplex leucophylla*), beach bursage, San Luis Obispo monardella (CNPS List 1B), crisp monardella) (CNPS List 1B), beach primrose, dune lupine, and Blochman's groundsel.

<u>Agricultural lands</u> exist within close proximity to Oso Flaco Lake and Little Oso Flaco Lake as well as the Creek Road and Silver Spur Place Alternative corridors. The federally listed Gambel's water cress has been documented on the edge of an agricultural area on the north side of Little Oso Flaco Lake (Ecosystems West 2004) (Figure 5).

## <u>Alternatives</u>

The following communities exist within the alternative access corridors and a detailed crosswalk for each alternative is provided below.

Table 4
Manual of California Vegetation (Sawyer and Keeler-Wolf) Series Observed

Vegetation Community	Ocean Str.	Creek P	Silver Spur	Conoco-Bi	Oso Flac	Little Oso F.	Laco
sand verbena-beach bursage series	X	Χ	Х	Х	Х	Χ	
dune lupine-goldenbush series	X	Χ	Х	Х	Х	Χ	
yellow bush lupine series-goldenbush series	X	Х	Х				
arroyo willow series-goldenbush series	Χ	Χ	Х				
arroyo willow series	X	Х	Х	Х	Х	Х	İ
mixed willow series	X	Χ	Х				
saltgrass series	Χ	Χ	Х		Х		
bulrush-cattail series				Х	Х	Χ	
cattail series					Х		
bur-reed series	Х	Χ	Х		Х		
veldt grass series				Х			
open sand	Х	Х	Х	Х	Х	Χ	
agricultural lands		Х	Х		Χ	Χ	

Table 5 Vegetation Communities Listed by Access Corridors

Creek Road	Silver Spur Place	Ocean Street
sand-verbena-beach bursage series	sand-verbena-beach bursage series	sand-verbena-beach bursage series
dune lupine-goldenbush series	dune lupine-goldenbush series	dune lupine-goldenbush series
yellow bush lupine- goldenbush series	yellow bush lupine- goldenbush series	yellow bush lupine- goldenbush series
arroyo willow-goldenbush series	arroyo willow-goldenbush series	arroyo willow-goldenbush series
arroyo willow series	arroyo willow series	arroyo willow series
mixed willow series	mixed willow series	mixed willow series
saltgrass series (lagoon)	saltgrass series (lagoon)	saltgrass series (lagoon)
bur-reed series	bur-reed series	bur-reed series
open sand	open sand	open sand
agricultural lands	agricultural lands	industrial
industrial		

Conoco-Phillips	Oso Flaco	Little Oso Flaco
sand-verbena-beach bursage series	sand-verbena-beach bursage series	sand-verbena-beach bursage series
dune lupine-goldenbush series	dune lupine-goldenbush series	dune lupine-goldenbush series
arroyo willow series	arroyo willow series	arroyo willow series
bulrush-cattail series	saltgrass series	bulrush-cattail series
veldt grass series	bulrush-cattail series	open sand
open sand	cattail series	agricultural lands
	bur-reed series	
	open sand	
	agricultural lands	

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### C. Sensitive Plant Species

### 1. Rare, Threatened, or Endangered Plants

Several sensitive plant populations are present within the Nipomo, Oceano, and Guadalupe Dunes Complex. There are seven known sensitive plant species known to occur in and around the Oceano Dunes SVRA and its access corridors. These species are listed as rare, threatened, endangered, or of concern by the federal government, by the State of California, or by the California Native Plant Society (CNPS).

### a.) Marsh sandwort (Arenaria paludicola)

Marsh sandwort (*Arenaria paludicola*) is a federally and state listed endangered species by the United States Fish and Wildlife Service and the California Department of Fish and Game. It is also recognized as a List 1B species by the CNPS. This species occurs in freshwater marshes and swamps, from sea level to 451 meters (1,480 feet) in elevation, in saturated, acidic, bog soils, predominantly sandy with high organic content (U.S. Fish and Wildlife Service 1998), and in dense mats of Typha, Juncus, and Scirpus, among others. It is usually supported by surrounding



**Photo 22:** Marsh Sandwort. Photo courtesy of the Washington State Department of Transportation [online].

vegetation, but can also grow upright. The stems can be up to 3 feet long and leaf blades are relatively linear and not spine-tipped. It flowers from May to August.

Only two of California's seven historical populations are known to exist today at Oso Flaco Lake and Black Lake Canyon. The San Luis Obispo Land Conservancy has purchased two land parcels and an easement on the parcel containing the marsh sandwort population in lower Black Lake Canyon and have begun to remove some young eucalyptus trees in an effort to lessen hydrologic changes in the marsh (USFWS 1998).

#### b.) La Graciosa Thistle (Cirsium scariosum var. citrinum)

The taxonomic status of La Graciosa thistle has recently been revised (Keil 2004, 2006). Previously, this thistle was known as *Cirsium loncholepis*, which was recognized as a federally listed endangered species and a California State threatened species. It is also recognized as a List 1B species by the CNPS.

The leaves of La Graciosa thistle are typically smooth or nearly so, not "cobwebby". There are no leafy bracts below the heads, although the leaves may

sometimes be close to the heads (McLeod 2001). It can be identified by its white or lightly purple-tinged flowers and blooms from April to July (and occasionally as late as November in coastal areas).

This taxon occurs in coastal dunes, brackish marshes, and riparian scrub habitats at lake edges, on riverbanks, or in wetlands between 0 and 106 meters (350 feet) in elevation in the Santa Barbara and San Luis Obispo region. Locally, it grows among low-growing plants such as sedge, salt grass, clover, and silverweed (U.S. Fish and Wildlife Service 2004a).

Its distribution was previously thought to be limited to coastal areas of southern San Luis Obispo and northwestern Santa Barbara counties, but Keil (2006) found that plants from our area are "often indistinguishable from plants of upland populations of the San Emigdio Mountains (Kern and Ventura counties) in the vicinity of the headwaters of the Cuyama River, a tributary of the Santa Maria River". Keil also reported that "other individuals from the San Emigdio Mountains cannot be distinguished from plants of other upland and lowland southern California sites ranging south to San Diego County". Thus, La Graciosa thistle is more widespread than was previously thought and its conservation status needs to be re-examined. Keil (2006) stated that "the combined taxon, Cirsium scariosum var. citrinum, should still be of conservation concern", as many of the known populations occur in highly developed areas and their current status is not known.

The thistle's habitat has declined primarily from wetland destruction, grazing, urban development, off-road vehicle use, and competition from invasive non-native plants (Essex 1998) in the project area. Locally, La Graciosa thistle occurs at the Callender Dunes, Jack Lake, Dune Lakes, Surprise Lake, Pismo Beach State Park, and the northwest shore of Oso Flaco Lake (California Department of Fish and Game 2005[a]).

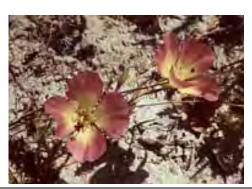
The U.S. Fish and Wildlife Service has agreed to review critical habitat designations for five California Species, one of which is La Graciosa thistle. The designations being reviewed currently cover 288,722 acres in nine California counties. According to the Settlement Agreement and Stipulation of Dismal records, the defendants, U.S. Fish and Wildlife Service (USFWS) should submit for publication in the Federal Register a proposed rule regarding any revisions to the designation. The deadline for a final decision is July 27, 2008 (USFWS 2006).

#### c.) Surf Thistle (Cirsium rhothophilum)

Surf Thistle (*Cirsium rhothophilum*) is a California State listed threatened species and a CNPS List 1B species. It is endemic to the dunes complex and occurs in coastal dunes and coastal bluff scrub, and appears to be largely restricted to foredunes (Ecosystems West Consulting Group 2004). This species is a short lived perennial, usually living two to three years. The leaves are distinctly wavy and the flowers are white or light yellow (McLeod 2001). It flowers from April through June. Its distribution is restricted to southern San Luis Obispo and northern Santa

Barbara Counties. This species has been recorded and observed at Pismo Beach, Guadalupe Oil Field, in dunes near Oso Flaco Lake, and the foredunes 0.25 miles south of Arroyo Grande Creek in the SVRA. Off-road vehicles, foot traffic, and competition with non-native plants represent ongoing threats (USFWS e 2000[a], Tibor 2001, and CNPS 2003 all *in* Ecosystems West Consulting Group 2004).

### d.) Pismo Clarkia (Clarkia speciosa ssp. immaculata)



**Photo 23:** Pismo Clarkia. Photo courtesy of Harlen Lewis @ CNPS.

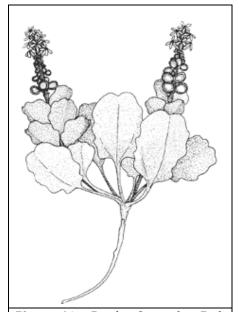
Pismo clarkia (Clarkia speciosa ssp. immaculata) is federally listed a endangered species, a CNPS List 1B species, and is a California State rare species. It typically grows in sandy hills near the coast from Pismo Beach to Edna Valley in San Luis Obispo County (Hickman 1993). It can also occur in grasslands, chaparral, and oak woodland communities below 183 meters (600 feet) in elevation (Essex 1998). This species displays decumbent stems and linear to narrowly lanceolate leaves. Flower petals

are reddish lavender shading to pale yellow or white below and can be seen in bloom from May to July. The Pismo clarkia's population has declined primarily from urban development, road maintenance, grazing, and invasive non-native plants (Essex 1998). Pismo clarkia can be observed at the Arroyo Grande Cemetery

and on the Nipomo Mesa (California Department of Fish and Game 2005[a]).

# e.) Beach Spectacle Pod (*Dithyrea maritima*)

Beach spectacle pod (*Dithyrea maritima*) is a California State threatened species and a CNPS List 1B species. It is a low growing perennial herb in the mustard family (Brassicaceae). It is found in small transverse foredunes within approximately 50-300 meters of the surf and currently occurs in the dunes of San Luis Obispo and Santa Barbara counties and on San Nicolas and San Miguel Islands (California Department of Fish and Game 2005[a]). It was previously known from Los Angeles County as well, but its range has been reduced (Munz 1974). The leaves are densely covered with grey hairs, reverse egg-shaped to rounded and somewhat fleshy



**Photo 24:** Beach Spectacle Pod. Drawing courtesy of California Department of Fish and Game 2005[a].

(McLeod 2001). The exposed stems are decumbent and less than 2 dm long, with the lower stems often under the sand (Hickman 1993). The flowers are white to lavender and can be seen from March to May. The fruits have flat, circular halves with raised rims. Recorded occurrences are at Pismo Beach State Park, Guadalupe Dunes, and dunes between the beach and Oso Flaco Lake (California Department of Fish and Game 2005[a]).

### f.) Nipomo Mesa Lupine (Lupinus nipomensis)

Nipomo Mesa lupine (*Lupinus nipomensis*) is an endangered species listed by the federal government and the State of California, as well as a CNPS List 1B species. Its occurrence is restricted to the Nipomo Mesa and adjacent back dunes associated with central dune scrub habitat in southwestern San Luis Obispo County. It is an annual species, which blooms from March to May. It is approximately 7.6 centimeters (3 inches) tall. The leaves are palmately compound with 5-7 leaflets. The flower petals are bluish to pink and the uppermost petal has a white to yellow spot (McLeod 2001). OHV activity



**Photo 25:** Nipomo Mesa lupine. Photo courtesy of Center for Plant Conservation. 2005 [online].

and coastal development threaten the existing populations of Nipomo Mesa lupine (California Department of Fish and Game 2005[a]). Expansion of introduced weedy plants, such as veldt grass, European beachgrass, and ice plant within the back dune scrub community, also threaten this species (California Department of Fish and Game 2005a). This lupine can be observed at the Callender Dunes, the Santa Maria Oil Refinery near Highway 1 at the ConocoPhillips Junction, south of Jack Lake, the Callender switching station, and Highway 1 near Black Lake (California Department of Fish and Game 2005[a]). Nipomo Mesa lupine was observed in several locations along the ConocoPhillips alternative access corridor in 2006.

### g.) Gambel's Water Cress (Rorippa gambelii)

Gambel's water cress (*Rorippa gambelii*) is a federally listed endangered species and California State threatened species. It is also recognized as a List 1B species by the CNPS. It is an herbaceous perennial of the Brassicaceae family. It occupies freshwater marshes and swamps between sea level and 451 meters (1,480 feet), usually at the margins of lakes and along streams, in or just above the water level. Currently, its distribution is limited to coastal wetlands of San Luis Obispo and Santa Barbara counties. It is a tall, erect perennial herb which grows from a rhizomatous stem. The leaves are compound, divided into 2 to 5 pairs of leaflets; flowers are white and can be seen from April to September (McLeod 2001).

Historically, it could be observed locally at Oso Flaco Lake, Little Oso Flaco Lake,

and Black Lake Canyon (as late at 1994) (California Department of Fish and Game 2005a). In 1998 John Chesnut observed approximately 460 individuals at Oso Flaco Lake, but did not observe any individuals at Little Oso Flaco Lake. Apparently, the site was dredged in the spring of 1998 (USFWS 1998). The shoreline of Oso Flaco Lake and Little Oso Flaco Lake were surveyed in spring 2006, however, this species was not observed. Gambel's watercress was also found along the southern California coast as far south as Baja California in the past; its abundance and range have been reduced dramatically (Munz 1974).



**Photo 26:** Gambel's Water Cress. Photo courtesy of Calphotos. Photographer unknown (CNPS).

### 2. Other Special-Status Plants Observed or with Potential to Occur

### a.) Hoover's Bent Grass (Agrostis hooveri)

Hoover's bent grass (*Agrostis hooveri*) is a California Native Plant Society (CNPS) List 1B species. It is an uncommon perennial grass which usually grows in dry, sandy soils, open chaparral, and oak woodlands in San Luis Obispo and Santa Barbara Counties. The flowering period for this species is between April and July.

### b.) Aphanisma (Aphanisma blitoides)

Aphanisma (*Aphanisma blitoides*) is a CNPS List 1B species. It is a rare, fleshy, glabrous annual which grows in sandy soil, coastal bluff scrub, coastal scrub, and coastal dunes (Hickman 1993). It has been found as far north as Point Sal and ranges south into Baja California (Smith 1998). Its stems are 10-55 cm and can be decumbent to erect with clasping leaves that are gradually reduced towards the tips of the stems. The foliage turns bright red as the plants dry up after flowering. This species blooms from March to June.

### c.) Obispo Indian Paintbrush (Castilleja densiflora ssp. obispoensis)

Obispo Indian paintbrush (Castilleja densiflora ssp. obispoensis) is a CNPS List 1B species. It is a sub-glabrous annual growing 10-40 cm (Hickman 1993). It grows in coastal, valley, and foothill grassland of San Luis Obispo County. Inflorescences are white to yellow and can be observed in April.

### d.) Leafy Tarplant (Deinandra [Hemizonia] increscens ssp. foliosa)

Leafy tarplant (*Deinandra* [*Hemizonia*] *increscens* ssp. *foliosa*) is a CNPS List 1B species. It is an annual growing 3-9 dm high with erect, bristly stems, generally branched below the middle. Leaves are generally dark green, bristly and glandular to puberulent above. It can be found in coastal valley and foothill grasslands in San Luis Obispo, Santa Barbara, and possibly Monterey counties. It is usually in bloom from June through September.

### e.) Dune (or Blochman's) Larkspur (Delphinium parryi ssp. blochmaniae)

Dune larkspur (*Delphinium parryi* ssp. *blochmaniae*) is a CNPS List 1B species. It occurs in maritime chaparral and coastal dunes in San Luis Obispo, Santa Barbara, and Ventura counties (Smith 1998). It flowers from April to May. It was observed in the ConocoPhillips alternative corridor in 2006.

### f.) Blochman's Leafy Daisy (Erigeron blochmaniae)

Blochman's Leafy Daisy is a CNPS List 1B species. It is a perennial 40-80 cm tall.

Leaves on the stems are 1-3 cm and linear to narrowly oblanceolate, evenly sized and spaced (Hickman 1993). This species grows in coastal dunes and coastal scrub in San Luis Obispo and Santa Barbara Counties. It flowers from July to September. Blochman's leafy daisy was observed in the Creek Road, Silver Spur Place, and Ocean Street alternative access corridors, as well as, in the ConocoPhillips and Oso Flaco corridors in 2005 and 2006.



**Photo 27:** Blochman's Leafy Daisy. July 4, 2005. *Photo by Jennifer Jackson*.

### g.) Mesa Horkelia (Horkelia cuneata ssp. puberula)

Mesa horkelia (*Horkelia cuneata* ssp. *puberula*) is a CNPS List 1B species. Plants are matted, green or grayish with stems generally 20-70 cm (Hickman 1993). It occurs in sandy or gravelly soil, cismontane woodland, and coastal scrub in southern California. It blooms from February to September.

### h.) Kellogg's Horkelia (Horkelia cuneata ssp. sericea)

Kellogg's Horkelia (*Horkelia cuneata* ssp. *sericea*) is a CNPS List 1B species which grows in sandy or gravelly soil, openings in closed-cone coniferous forest, maritime chaparral, coastal scrub, or coastal prairie. It occurs in several counties throughout coastal southern California. It flowers between April through September.

### i.) San Luis Obispo County Lupine (Lupinus ludovicianus)

San Luis Obispo County Lupine (*Lupinus ludovicianus*) is a CNPS List 1B species. It is a perennial herb that occurs in coastal dunes, preferably on open, grassy areas, on limestone, and in oak woodlands (Hickman 1993) of San Luis Obispo County. Its stems are erect and branched just above ground, growing from 3-6 dm. It flowers between April and July.

### j.) Crisp Monardella (Monardella crispa)

Crisp monardella (Monardella crispa) is listed on CNPS List 1B. It is a woody, subshrub of the Mint family approximately 5 dm tall. The densely are white woolly, stems characteristic separating this species from the closely related San Luis Obispo monardella (Monardella frutescens) (Ecosystems West Consulting Group 2004). It occurs in coastal dunes and coastal shrub in Santa Barbara and San Luis Obispo Counties and blooms from February to October. Crisp monardella was observed in 2005 and 2006 in the ConocoPhillips and Oso Flaco alternative access corridors in 2005 and 2006.



**Photo 28:** Crisp Monardella. July 12, 2005. *Photo by Jennifer Jackson.* 

#### k.) San Luis Obispo Monardella (Monardella frutescens)

San Luis Obispo monardella (*Monardella frutescens*) is a CNPS List 1B species. It is a perennial herb with several, sparsely hairy, purple stems. Leaves are linear to narrowly lanceolate, sparsely hairy, green, with wavy margins (Hickman 1993). Flowers are rose-purple to purple. It occurs in coastal dunes and coastal scrub in Santa Barbara and San Luis Obispo counties and blooms from May to September. Individual plants that approached San Luis Obispo monardella were observed in the ConocoPhillips alternative access corridor in 2005 and 2006.

#### 1.) Coast Woolly-heads (Nemacaulis denudata var. denudata)

Coast woolly-heads (Nemacaulis denudata var. denudata) is an annual with a basal rosette of leaves, wire-like stems to 4 dm long, and clusters of white flowers. It was previously known from coastal California between Los Angeles and San Diego counties (including a historic occurrence on Santa Catalina Island) and the northwestern coast of Baja California (Reveal and Ertter 1980). Typically occurring on sandy beaches and in sand dunes along the immediate coast, it flowers from late March in Baja California to August farther north (Reveal and Ertter 1980). The occurrence near Oso Flaco Lake represents a new occurrence for San Luis Obispo

County and a disjunct population whose origin is uncertain. It was noted in 2005

and 2006 along the Oso Flaco alternative access corridor and was first seen in the same area a couple of years ago (Dave Keil, personal communication 2006). Because of its location along the boardwalk and the fact that it is so far from historical locations, we cannot be certain if it is a non-anthropogenic occurrence or was introduced by human activities. In any event, the population appears to be healthy and robust.



**Photo 29:** Coast woolly-heads. June 9, 2005. *Photo by Jennifer Jackson.* 

### m.) Black-flowered figwort (Scrophularia atrata)

Black-flowered figwort (*Scrophularia atrata*) is listed on the CNPS List 1B. It is a perennial herb growing 10-12 dm. It is known to occur in closed-cone coniferous forests, chaparral, coastal dunes, coastal scrub, and riparian scrub in Santa Barbara and San Luis Obispo counties. It flowers from May to October.

### 3. Other Significant Plant Species

### a.) Long-stalked Starwort (Stellaria longipes var. longipes)

Long-stalked starwort (*Stellaria longipes* var. *longipes*) (Figure 5) is not a federal, state, or CNPS listed species. However, its occurrence at Oceano Dunes SVRA is "remarkable and unusual" for the Central Coast region and it was not previously known to occur in the region (Ecosystems West Consulting Group 2004). It is a perennial herb, ascending to erect, 5-35 cm in length, generally glabrous, with white rhizomes (Hickman 1993). The leaves are opposite, evenly spaced, lancelinear, 1-4 cm long, and usually glabrous, although the stems may have some scattered wavy hairs. This species typically occurs in moist meadows, seeps, on stream banks, and in other moist to wet habitats at medium to high elevations. The nearest previously known locality to Oceano Dunes SVRA is in the southern Sierra Nevada in southern Tulare County, more than 120 miles northeast (Ecosystems West Consulting Group 2004).

#### b.) European Beachgrass (Ammophila arenaria)

European beachgrass (Ammophila arenaria) is an introduced perennial grass. It grows in small tufts connected by deep, tough, extensively creeping rhizomes (Russo et al. 1995). This beachgrass is native to European and North African coastlines between 30 and 63 degrees north latitude. It now occurs on sandy

coastal dunes on the Pacific coast from Washington state to San Diego County, California.

The species thrives in areas where there is constant movement of sand and in stabilized dunes. Often it occupies the windward slopes of exposed dunes, but it is known to extend inland for several miles (Russo *et al.* 1995). It tolerates a range of soil pH from 4.5-9.0 and soil temperatures from 10-40 ° C (Ranwell 1959). Reproduction is primarily via vegetative rhizomes. Rhizome fragments are dispersed along the shore by wind and water (Wallen 1980). Long distance dispersal is usually by marine transport of dormant rhizomes, which can withstand submersion for long periods (Baye 1990).

European beachgrass replaces the native foredune vegetation, greatly reducing species diversity (Barbour and Johnson 1977). This species was first introduced at Golden Gate Park, San Francisco, in the late 1800s (Lamson-Scribner 1895), the species was heralded as a desirable sand stabilizer and was eventually embraced by the U.S. Soil Conservation Service and other agencies. It was introduced in Oceano around the turn of the century and planted extensively to stabilize the dunes. Prior to the introduction of beachgrass, foredunes in northern California were dominated by American dunegrass (*Elymus mollis*) (Barbour and Johnson 1977). Ranwell (1959) reports that *A. arenaria* can survive 100 cm of sand deposition per year, whereas American dunegrass can only tolerate 30 cm per year. Increased human disturbance and sand dune destabilization, along the coastline, favors beachgrass (Barbour and Johnson 1977).

Dunes dominated by beachgrass also have lower arthropod species diversity, and fewer rare arthropod species than dunes dominated by native species (Slobodchikoff and Doyden 1977). The reduction in the amount of open sand areas in dunes dominated by European beachgrass has severely reduced nesting habitat for the federally listed threatened western snowy plover (*Charadrius alexandrinus*) (Pickart and Sawyer 1998).

Beachgrass scores a "High" rating in the California Invasive Plant Council Plant Inventory (Cal-IPC), but it is not an "Alert" species. A High score is given to those species which have severe ecological impacts on Ecosystems, plant, and animals communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. These species are usually widely distributed ecologically, both among and within Ecosystems (Apteker 2005).

Control of this introduced species is necessary to protect viable sand dune systems along California's coastlines (The Nature Conservancy 1998). Manual removal can control the spread of the species with great success, but at great expense. Weekly to monthly treatment intervals from early spring through fall are suggested throughout the first year. If sand is sifted with rakes to remove rhizome fragments for a depth of 0.5-1 m a second season of digging is likely to be avoided. In general, less follow-up digging is required when first-year treatment were more frequent,

more thorough, and/or larger in less dense locations (so that fewer plants reinvaded from surrounding stands) (Apteker 2005). Some experimentation with chemical control methods has been documented. In trials conducted in northern California from 1991 to 1994, glyphosate (Roundup®) was the only foliar treatment that consistently reduced live European beachgrass cover. It was applied at 4 percent or 10 percent and mixed with 0.5 percent added surfactant (Citowett® or Silwet L-77® were used) applied at 200 gallons per acre (Aptekar 2005). Chemical treatment is likely to be the most cost effective method of those used to date.

### c.) Purple Veldt Grass (Ehrharta calycina)

Purple veldt grass (Ehrharta calycina) also known as, perennial veldt grass, is a native of southern Africa and was first reported in California in 1929, imported as a seed from Australia (Love 1948). It is an erect, tussock-forming, aggressive perennial grass that inhabits sandy soils and dunes in Santa Barbara and San Luis Obispo Counties (California Invasive Plant Council 2006). It was observed in all alternative access corridors during surveys conducted in 2005 and 2006 and was particularly prevalent in the ConocoPhillips corridor. The species of veldt grass observed at the SVRA, *E. calycina*, is primarily spread by wind-borne seed although sometimes rhizomes are present.

A fast grower, veldt grass exploits available water and nutrients that would otherwise by available to slower growing native shrubs (Elkhorn Slough 2000). The Land Conservancy of San Luis Obispo (SLO Land Conservancy) has initiated the Guadalupe-Nipomo Dunes Weed Eradication Program which has targeted three invasive plant species: Veldt grass, beach grass, and pampas grass (*Cortaderia jubata* and *C. selloana*). Purple veldt grass scores a "High" rating in the Cal-IPC Plant Inventory, but it is not an "Alert" species. Currently, the SLO Land Conservancy is evaluating removal regimes and eradication methods at the SVRA. A sequence of techniques such as mowing, spot-treating with glyphosate (Roundup®), native reseeding, and restoration have proven to be effective (Mark Skinner, pers. comm. 2006).

**INSERT FIGURE 5-Plants** 

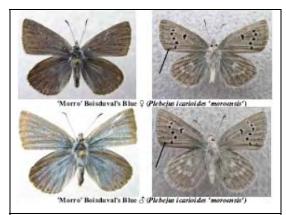
### D. Wildlife

### 1. Sensitive Wildlife Species

### a.) Morro Boisduval's Blue (Plebejus icarioides morroensis)

#### Taxonomy

Morro Boisduval's Blue (Plebejus icarioides subsp. morroensis) is a small blue butterfly that was formerly considered a subspecies of Plebejus icarioides. However, the most recent edition of the Checklist of North American Butterflies Occurring North of Mexico (North American Butterfly Association 2001) omits all subspecies for this species and uses the old name of Plebejus icarioides for Boisduval's Blue. These changes in generic name and lack of subspecies recognition are the result of peer review of taxonomic literature (Walgren et. al 2005).



**Photo 30: Morro Boisduval's Blue.** Photographs courtesy of Walgren, Graeff, Andreano, and Beaulieu (2006).

#### Distribution

Morro Boisduval's Blue is a locally common taxon, endemic to the dune complexes on the central coast of California, from Morro Bay south to Point Pedernales (Walgren *et al.* 2005).

#### Biology

Morro Boisduval's Blue is common from March to July, with the males appearing first. This animal feeds on dune lupine (*Lupinus chamissonis*) and caterpillars are ant-attended (Walgren *et al.* 2006). The butterfly larvae live in ant nests and the ants attend to them and protect them during their larval stage. In turn, the larvae secrete a sweet liquid from their skin that provides food for the ants.

#### Listing & Conservation Status

This taxon was a California Species of Special Concern until 2004 when the California Department of Fish and Game eliminated it from the list. At this time, it is not protected by state or federal law. However, California State Parks San Luis Obispo Coast District and the Oceano Dunes District have determined that during CEQA review of State Parks projects, it will continue to consider this animal as a subspecies (and to evaluate impacts to this taxon in a manner equivalent to a rare, threatened, or endangered species) pursuant to CEQA (Walgren *et al.* 2005, A. Zilke *pers. comm.* 2006).

#### Occurrence in the SVRA

Small blue butterflies were observed frequently along the ConocoPhillips Alternative and Little Oso Flaco Lake Alternative in May and June 2006 (Figure 6). All of the animals appeared to be associated with dune lupine (*Lupinus chamissonis*), which is consistent with the host plant at Morro Strand State Beach and other State Park properties in the Estero Bay Area reported by Walgren *et al.* (2006). Two individuals were collected that have been tentatively identified as Morro Boisduval's Blue (R. Priestaf *pers. comm.* 2006). Additional collections should be made before a positive identification is assigned.

### b.) Steelhead (Onychorhynchus mykiss)

### **Taxonomy**

Rainbow trout (Onychorhynchus mykiss) exhibit significant genetic, ecological, and behavioral diversity among Pacific salmonids. This diversity includes

distinctions between inland and coastal populations, genetically distinct latitudinal groupings, and variation in migration schedules and degrees of anadromy. The name 'steelhead' describes anadromous rainbow trout (Busby *et al.* 1996).

#### Distribution

Rainbow trout are native to the Pacific coasts of North America and Asia. In North America known spawning populations can be found from Alaska south to Malibu Creek in Los Angeles County, California. Both their latitudinal range and inland range appear to be in decline (Busby *et al.* 1996, McEwan and Jackson 1996, Moyle and Williams 1990).



**Photo 31:** Juvenile Steelhead from Arroyo Grande Creek being measured by State Parks fisheries biologist February 2006. After this photo was taken, they were released alive and unharmed in the stream and were observed swimming away. February 2006. *Photo by Elihu Gevirtz* 

### **Biology**

Steelhead are born in freshwater streams, spend most of their life in the ocean, and then return to spawn in freshwater streams three to five years later. The spawning habits of steelhead differ from most other anadromous salmonids in that steelhead generally spawn repeatedly (iteroparous) whereas other anadromous salmonids spawn only once before dying (semelparous). Different populations of steelhead will make spawning runs during different seasons, though most California steelhead spawn between December and April (McEwan and Jackson 1996).

Steelhead lay their eggs in streams and rivers with consistent flow and a gravel substrate. The female will dig and spawn in several nests, collectively termed a "redd." In order to successfully reproduce, steelhead require cool, clean, oxygenrich streams with sufficient gravel for the fish to dig redds. Preferred conditions for steelhead spawning are water depth from 6 to 24 inches, water velocity of 1

to 3.6 feet per second, substrate diameter between 0.2 and 04.0 inches, and water temperature between 39 and 51° F (McEwan and Jackson 1996).

The eggs will develop for a period of time that varies based on water temperature, but last about 30 days at 51° F. The fry will emerge from the gravel four to six weeks after hatching, depending on a number of factors including redd depth, gravel size, siltation, and temperature. The young fish then inhabit shallow areas near stream edges until they are large enough to safely move into less protected, deeper areas of the stream (McEwan and Jackson 1996).

#### <u>Listing & Conservation Status</u>

Along the west coast of North America, steelhead are divided into 15 evolutionarily significant units (ESUs), each of which is listed separately pursuant to state and federal endangered species legislation. Steelhead occurring in the South-Central California Coast ESU, which includes "all naturally spawned populations of steelhead (and their progeny) in streams from the Pajaro River (inclusive) to, but not including the Santa Maria River, California," is federally listed as Threatened and is a California Species of Special Concern (National Marine Fisheries Service 2005).

In 1994 the California Sportfishing Protection Alliance filed a complaint with the State Water Resources Control Board asking them to order mandatory minimum flow levels for the protection of anadromous steelhead in Arroyo Grande Creek (California Sportfishing Protection Alliance website). By 1997 steelhead inhabiting the South-Central California Coast ESU were declared threatened under the Endangered Species Act. This prompted the implementation of mandatory minimum flow levels in 1999 and the development of a Habitat Conservation Plan (HCP) for the San Luis Obispo County Flood Control and Water Conservation District. The County's HCP (Stetson Engineers et al 2004) is intended to protect steelhead and red-legged frogs in Arroyo Grande Creek and to provide for incidental take of these species during the course of District operations and maintenance activities affecting Arroyo Grande Creek. The Habitat Conservation Plan for state parks in San Luis Obispo County that is being prepared for California State Parks does not currently propose covering steelhead because visitor use and park operations and maintenance activities are not likely to cause take of this species. (P. Hartman and D. Doberneck *pers. comm.* 2006).

#### Threats

Primary causes of decreasing steelhead populations include decreased stream flow due to water diversions and groundwater extraction, blocked or limited access to spawning grounds by dams and other structures, and sedimentation due to soil disturbances that can smother eggs and trap fry (Busby *et al.* 1996). It is possible for non-anadromous rainbow trout to produce offspring that will join the anadromous steelhead population and vice-versa, but the fitness of these offspring within the anadromous population is uncertain (Varanashi 2004).

### Arroyo Grande Creek Population

Steelhead numbers in Arroyo Grande Creek have decreased significantly since they were first recorded in the early 1940s. Estimates collected by Ralph N. Hinton (1961) from fishermen who had experience fishing the Arroyo Grande suggest that the annual steelhead population in the early 1940s reached the thousands, and that steelhead presence varied primarily with annual rainfall levels. The same surveys suggest that up to the early 1950s the annual population generally fluctuated within the hundreds, but

that by 1960 the number of spawning steelhead in Arroyo Grande Creek had been significantly reduced (Hinton 1961). This was before construction of Lopez Dam in 1969. The dam reduced flow and eliminated access to spawning beds and thereby contributed to the reduction in numbers of spawning steelhead in the creek (Schuler 1972, Brown 2002).

Today, steelhead still inhabit most of the 15-mile reach of Arroyo Grande Creek below the dam. Current adult runs are speculated to be in the dozens, and perhaps occasionally low-hundreds in wetter years (Rischbieter 2004). Some fishermen report catching juvenile and landlocked steelhead in recent years (Brown 2002). During surveys of Arroyo Grande Creek in 2006, juvenile steelhead were observed between Arroyo Grande Creek Lagoon and the 22nd Street bridge (Rischbieter 2006) (Figure 6 and Photo 31).

Steelhead migrate through the creek between the tide line and Arroyo Grande Creek Lagoon in relatively brief periods of time in order to reach spawning grounds upstream during winter or early spring



**Photo 32:** Lopez dam on Arroyo Grande Creek © San Luis Obispo Department of Public Works.



**Photo 33:** Arroyo Grande Creek mouth at Oceano Dunes SVRA. February 2006. *Photo by Elihu Gevirtz.* 

when heavy rains have produced high flow in the creek. These high flows are extreme events, and the creek is too deep for vehicles to cross, though some individuals attempt to cross with their vehicles even after being warned of the danger by State Parks officials. However, these flood events are typically short-lived, receding over several days to lower flows. Typically, at this season, the number of visitors to the park is relatively low. Because steelhead use the stretch of creek between the surf line and Arroyo Grande Creek Lagoon as a migration corridor but not as a spawning area, it is unlikely that vehicles crossing the creek encounter steelhead (Rischbieter *pers. comm.* 2006, Spina *pers. comm.* 2006).

Some members of the public are concerned that vehicles driven through the creek between the lagoon and the ocean have the potential to negatively impact steelhead. The U.S. National Marine Fisheries Service (NMFS) has twice opined that steelhead are unlikely to come in contact with vehicles crossing Arroyo Grande Creek between the lagoon and the ocean.

"We determined the action [maintenance of two beach access ramps that would provide off-road vehicle access to the beach] is not likely to affect steelhead. This determination is based on our belief that the notion of an encounter between a motor vehicle and a steelhead is highly speculative" (Hogarth 1998).

NMFS also rendered the following opinion regarding excavation of sand from two existing beach access ramps, discharging the material along the foreshore, and provision of off-road vehicle access to the beach and creek within the area of tidal influence:

"Although this portion of Arroyo Grande Creek serves as a migration corridor for adult and juvenile steelhead, the proposed action, including any off-road vehicle use, is not expected to diminish the value of this essential feature of critical habitat" (Lent 2000).

### Management of Steelhead in Arroyo Grande Creek

Since 1998, releases of 4 million gallons per day or 2,800 acre feet per year from Lopez Dam have been made for the purpose of maintaining in-stream aquatic habitat. NOAA Fisheries is currently working on establishment of a recommendation for stream flow that will serve as the basis for guiding development of the Habitat Conservation Plan as it pertains to habitat requirements for steelhead (NOAA 2004 memo to San Luis Obispo County Board of Supervisors in Central Coast Salmon Enhancement 2005). When complete, the County's Arroyo Grande Habitat Conservation Plan will include Arroyo Grande Creek from Lopez Dam (Photo 32) to the flood control channel at Fair Oaks Boulevard and will include sufficient riparian area along the creek to support ecological processes associated with habitat for steelhead and red-legged frogs (Stetson Engineers *et al.* 2004).

State Parks has taken a number of steps to reduce the impacts to sensitive habitats from the existing creek crossing. In 2006, a document titled "Instream and Riparian Activities Management Plan" was developed "to sustain or increase local populations of steelhead and to maintain or restore habitats and naturally functioning ecosystems" (California Department of Parks and Recreation 2006a). Furthermore, Superintendent Order OHV-554-1-06 (provided in full in Appendix 8 was issued in 2006 by California State Parks Off-Highway Vehicle Division describing restrictions regarding motorized vehicles (California Department of Parks and Recreation 2006b). The Superintendent Order states in part:

"That portion of Pismo State Beach operated as part of Oceano Dunes SVRA south from the vehicle prohibition posted at Grand Avenue to beach marker post #2: Only street legal vehicles may be operated in this area. It is prohibited to cross Arroyo Grande Creek in any other manner then by crossing the creek as close to the ocean waterline as possible and parallel to the ocean waterline. Driving upstream or downstream in the creek channel or in any other manner in the creek channel is prohibited. If the creek crossing is posted "closed", crossing the creek is prohibited...."

"Any area permanently or temporarily fenced or posted closed to vehicle operation within the allowed riding areas: Motor vehicle operation is prohibited."

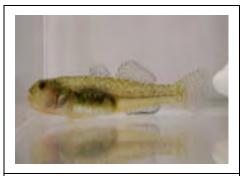
### Oso Flaco Creek Population

Rischbieter, Walgren, and Hartman (2005a) report that steelhead are absent from Oso Flaco Creek and that there is a lack of suitable habitat, noting, in part, that the watershed is subject to pollution from agricultural operations, and has been damaged in the past by oil/chemical spills.

### c.) Tidewater goby (Eucyclogobius newberryi)

#### Taxonomy

The tidewater goby (*Eucyclogobius newberryi*) was first described in 1857, a classification that the majority of scientists accept. Recent work by Dawson *et al.* (2001) suggests that the primarily estuarine existence and wide latitudinal range of the goby has led to the evolution of several genetically distinct subpopulations (U.S. Fish and Wildlife Service 2000[b], Dawson *et al.* 2001). For regulatory purposes the subpopulations are not yet considered distinct, though a separate listing has been proposed for the Southern California subpopulation.



**Photo 34:** Tidewater goby ©Greg Goldsmith. Photograph provided by Fish and Wildlife Service.

#### Distribution

The species is endemic to California, with a historic range extending from the northern border of the state to San Diego County. It is generally found in shallow, brackish, slow moving water in coastal lagoons, estuaries, marshes, and stream mouths, typically near the freshwater-saltwater interface. Tidewater gobies venture into the ocean rarely, and only when flushed out from their typical habitat by floods, freshets, or breached lagoon sandbars (U.S. Fish and Wildlife Service 2004[b]).

Typical habitat for the tidewater goby is within coastal lagoons and brackish water in large estuaries. The species is typically found in water less than 1 meter deep with salinity below 12 parts per thousand, but gobies have been observed in habitat with salinity ranging from 0 to 42 parts per thousand, and temperatures between 8 and 25°C, as well as in areas with relatively low levels of dissolved oxygen (U.S. Fish and Wildlife Service 2004[b]).

### **Biology**

The tidewater goby is a small, benthic fish (usually less than 50 mm in length) with large, transparent pectoral fins. The bodies of males are nearly transparent, with females being darker to brown or black. The most distinct marker separating the tidewater goby from other gobies is the transparent or extremely light patch on the upper tip of the front dorsal fin (U.S. Fish and Wildlife Service 2004[b]).

Tidewater gobies generally spawn between spring and mid-summer, when the water temperature is between 15 and 20°C (about 60-70°F) and salinity is between 0 and 25 parts per thousand. In warmer years reproduction may occur throughout the year. Female gobies produce eggs, which they attach to grains of sand in the walls of small burrows that males dig in substrate ranging from coarse sand (grains averaging 0.5 mm in diameter) to more silt-dominated, muddy habitats (Swift *et al.* 1989, Swenson 1995). Newly hatched gobies are planktonic for the first few days of life, drifting freely within the water column, after which they move into shallow lagoons or estuaries and shift to the benthic subsistence of adults (U.S. Fish and Wildlife Service 2000[b]).

Despite never persistently inhabiting a environment, re-colonization of marine extirpated habitat suggests that tidewater gobies are capable of dispersing via the Regardless, mitochondrial DNA analysis suggests that Southern California populations of tidewater gobies are genetically distinct from the greater California population (Dawson et al. 2001).

**Photo 35:** Lagoon at mouth of Arroyo Grande Creek. January 2006. *Photo by Elihu Gevirtz.* 

### **Listing & Conservation Status**

The tidewater goby is federally endangered Elihu Gevirtz.

and is listed as a California Species of Special Concern by the California Department of Fish and Game (CDFG) (U.S. Fish and Wildlife Service 2004[b]). The Fish and Wildlife Service has proposed separate recognition of the genetically distinct southern subpopulations under the Endangered Species Act, but the current listing includes the entire population (U.S. Fish and Wildlife Service 2000b).

#### Threats

The tidewater goby has several natural predators, including prickly sculpin (*Cottus asper*), staghorn sculpin (*Leptocottus armatus*), starry flounder (*Platichthys californicus*), and possibly steelhead (*Onychorhynchus mykiss*). It is also preyed upon by introduced species, including largemouth bass, striped bass (*Marone saxatilis*), and exotic estuarine gobies. Anthropogenic threats to the species include habitat

loss due to coastal development projects, channelization, diversion of streams, dredging, and associated changes in salinity (U.S. Fish and Wildlife Service 2004[b]).

### Arroyo Grande Creek Lagoon Population & Management

Tidewater gobies are known to be present in Arroyo Grande Creek Lagoon immediately upstream from the mouth of the creek (Rischbieter 2005[b]). Rischbieter also observed tidewater gobies in Arroyo Grande Creek Lagoon in February 2006 (Rischbieter 2006) (Figure 6). Vehicles crossing the stream between Arroyo Grande Creek Lagoon and the tide line is not thought to adversely affect the goby, as this stretch of the creek does not usually provide suitable habitat for this species. The stream between Arroyo Grande Creek Lagoon and the tide line is typically shallow and sandy and does not support aquatic macrofauna or vegetation (Rischbieter 2005[b]).

Arroyo Grande Creek Lagoon offers a deeper, richer, and more complex habitat that is more suitable for tidewater goby than the stretch of creek between the lagoon and the tide line. Because of the dynamic nature of the system, the location of the stream and the extent of the lagoon often changes. This effects the distribution of fish in the back-beach area.

Tidewater goby is not covered by the Habitat Conservation Plan currently being prepared for California State Parks because visitor use and park operations and maintenance activities are not likely to cause take of this species (D. Doberneck pers. comm. 2006). However, when sensitive species such as tidewater goby are discovered in an area that is not closed to the public due to the shifting extent of the stream and lagoon, State Parks typically responds quickly by shifting the closure signs and fencing to protect the resource (A. Zilke, pers. comm. 2006 and California Department of Parks and Recreation 2006b). Vehicles are prohibited from Arroyo Grande Creek Lagoon, although some pedestrian and equestrian traffic does occur along the edge of Arroyo Grande Creek Lagoon. California State Parks reserves the right to provide additional protections for this habitat as necessary through the use of public closure zones and fines (California Department of Parks and Recreation 2006(b).

#### Oso Flaco Creek Population

Rischbieter, Walgren, and Hartman (2005b) report that tidewater goby is absent from Oso Flaco Creek and that there is a lack of suitable habitat, noting, in part, that the watershed is subject to pollution from agricultural operations, and has been damaged in the past by oil/chemical spills.

#### d.) California red-legged frog (Rana draytonii)

#### Taxonomy

The California red-legged frog (*Rana draytonii*) is one of two species of red-legged frog, the other being the northern red-legged frog (*Rana aurora*) (Shaffer *et al.* 2004). California red-legged frogs are both morphologically and behaviorally different

from northern red-legged frogs (Jennings and Hayes 1994). The California Department of Fish and Game's Natural Diversity Database currently lists this species as *Rana aurora draytonii*.

#### Distribution

The historic range of the species extended along the California coast from the vicinity of Point Reyes National Seashore in Marin County and inland from the vicinity of Redding in Shasta County, south to northwestern Baja California in Mexico. Arroyo Grande Creek is one of the 30 waterways in San Luis Obispo County in which California red-legged frogs have been found (U.S. Fish and Wildlife Service 2002[a]). California red-legged frog has been eliminated from 75 percent of its former range in California (Stebbins 2003).

### **Biology**

The California red-legged frog is the largest native frog in the western United States, ranging in size from 1.5 to 5 inches in length. Adults are reddish to pink on the abdomen and hind legs, and brown, gray, olive, or reddish-brown with small black flecks and larger dark blotches on their backs (U.S. Fish and Wildlife Service 2006[a]).

Red-legged frogs inhabit a variety of freshwater wetland habitats depending upon their life stage and the season. All life history stages can be found in and around breeding sites such as coastal lagoons,



**Photo 36:** One of five California red-legged frogs observed in Arroyo Grande Creek in April 2006. *Photo by Vince Semonsen.* 

marshes, springs, permanent and semi-permanent natural ponds, ponded backwater portions of streams, as well as artificial impoundments (e. g. stock ponds, irrigation ponds and siltation ponds) (U.S. Fish and Wildlife Service 1997). Tadpoles remain in these aquatic habitats until metamorphosis during the summer months.

Young red-legged frogs frequent slow moving, shallow riffle zones in creeks and the margins of ponds. During the summer, adult red-legged frogs are typically found close to a pond or a deep pool in a creek that has emergent vegetation, undercut banks, or semi-submerged rootballs which afford shelter from predators (U.S. Fish and Wildlife Service 1997). The presence of vegetation on the bank such as *Typha*, *Scirpus*, and *Salix* is an indicator that the site may provide foraging and/or breeding habitat for red-legged frogs, though the absence of these species at an aquatic site does not preclude the presence of this species (Jennings and Hayes 1994, U.S. Fish and Wildlife Service 2006[a]).

Red-legged frogs breed between late November and late April in pond habitats (Jennings and Hayes 1994) and occasionally in stream habitats (Hunt 1993, unpubl.

data). Females lay between 2,000 and 5,000 eggs in clusters attached to vegetation in ponds or still pools in creeks, which will generally hatch 6-14 days after fertilization. Larvae remain in deep, slow moving pools for 4-5 months and generally metamorphose between July and September. Both the eggs and larvae are sensitive to salinity; eggs die when exposed to 4.5 parts per thousand, and larvae cannot survive above 9 parts per thousand. Young frogs can be found in slow moving, shallow areas in creeks and along pond edges (U.S. Fish and Wildlife Service 2006[a], U.S. Fish and Wildlife Service 2002[a]).

### **Listing & Conservation Status**

California red-legged frog is federally listed as threatened and is a California Species of Special Concern. Its range is currently reduced to approximately 70 percent of its historical habitat (U.S. Fish and Wildlife Service 2006[a], U.S. Fish and Wildlife Service 2002[a]). Arroyo Grande Creek was included in the proposed critical habitat designation for red-legged frog as of 2001 (U.S. Fish and Wildlife Service 2001[a]); however, as of April 2006, Arroyo Grande Creek is not part of the critical habitat designated by the U.S. Fish and Wildlife Service for this species (U.S. Fish and Wildlife Service 2006[a]).<sup>2</sup>

#### Threats

Degradation and loss of critical freshwater and riparian habitat for flood control purposes throughout the range of this species, coupled with increased predation and competition from introduced predators such as the American bullfrog (Rana catesbeiana) and a variety of nonnative fish (including bass, sunfish, carp, and mosquitofish) are believed to be the primary factors responsible for the decline of this species in Central and Southern California (Jennings and Hayes 1994).



**Photo 37:** American Bullfrog is one of several predators of California red-legged frog. © 2005 Jason Gibson.

#### Arroyo Grande Creek Population & Management

Probably because of sediment deposition from adjacent cultivated agricultural lands, sections of Arroyo Grande Creek below Lopez dam lack the deep pools that provide important habitat for red-legged frog.

There is some potential breeding habitat outside the mainstem of the creek including; Arroyo Grande Creek Lagoon, in a tributary near the lagoon, and near

<sup>&</sup>lt;sup>2</sup> Almost 90% of the proposed critical habitat was removed in the final designation because the proposed designation included areas that did not contain large populations of California redlegged frog or ecological characteristics that would make re-establishment of the frog practical (U.S. Fish and Wildlife Service 2006).

the base of Lopez Dam (Stetson Engineers *et al.* 2004). In surveys of Arroyo Grande Creek between 1996 and 1999, there were four documented occurrences of California red-legged frogs, though no tadpoles were sighted during any of these surveys (Stetson Engineers *et al.* 2004).

There have been several documented occurrences of red-legged frog within five miles of Arroyo Grande Creek, including five sightings along Los Berros Creek and its tributaries, and one sighting of a juvenile red-legged frog at an agricultural pond less than 2 miles southeast of Arroyo Grande Creek. This last pond was considered by Stetson *et al.* to be a likely breeding site (Stetson Engineers *et al.* 2004). Stetson *et al.* found no evidence of breeding and reasoned that the occurrences within and near the creek were individuals dispersing from other nearby breeding populations (Stetson Engineers *et al.* 2004). However, five (adult and subadult) red-legged frogs were observed in ponded water immediately adjacent to the main channel of Arroyo Grande Creek at the 22<sup>nd</sup> Street bridge in April 2006 (Photo 21, Figure 6). (One bullfrog and several crayfish were also found in the same pond). Thus, breeding may be occurring in Arroyo Grande Creek.

#### Oso Flaco Lake & Oso Flaco Creek Occurrence

California red-legged frogs were observed in the Oso Flaco Lake region in 2000, specifically sighted in "Finger Lake" and "Snake Lake" (Schneider 2000). Night surveys of Oso Flaco Creek above Little Oso Flaco Lake conducted in 2002 found California red-legged frogs in the creek above Little Oso Flaco Lake (Figure 6) (Semonsen 2002).

In June 2006, one night survey was conducted on Oso Flaco Lake and Little Oso Flaco Lake, red-legged frogs were not observed. Additional surveys would be required to qualify it as a protocol survey to determine presence or absence. One possible reason of the lack of observation could be the presence of non-native predatory fish in the lake. Oso Flaco Creek upstream of Little Oso Flaco Lake was not surveyed in 2006.

#### Lettuce Lake and Jack Lake

One California red-legged frog was observed in March 2006 in Jack Lake (Figure 6). This may be the first recorded observation of this species at this location. None were observed in Lettuce Lake, which did not contain water at the time of the survey in March 2006.

### e.) Western Spadefoot (Spea hammondii)

#### Biology

Western spadefoots emerge from subterranean retreats (burrows of their own construction) following relatively warm late fall to late winter/early spring rains. They move to nearby ephemeral ponds to breed and lay eggs. Typical breeding habitat includes ephemeral wetlands (ponds and pools) that hold water for at least 22 days and agricultural impoundments that are free of introduced predators such

as fish and bullfrogs. Larval development occurs in these ephemeral wetlands and ranges in length from 21 to 77 days after hatching. Following breeding, adult spadefoots occupy shallow, temporary burrows in the vicinity of their breeding pools during the daytime. In the late spring when their breeding ponds begin to dry up, juvenile spadefoots metamorphose into small toads and disperse away from their drying pond. Adult spadefoots will dig underground burrows in which they will spend the dry season aestivating. Juvenile toads will also retreat underground for the dry season using soil cracks, mammal burrows, and burrows that they construct to escape the desiccating effects of the dry season (Svihla 1953, S. Sweet, L. Hunt, P. Collins, unpublished data, Gevirtz *et al.* 2005).

### <u>Listing & Conservation Status</u>

Western spadefoot is listed as a federal and state Species of Special Concern.

#### Threats

The western spadefoot is threatened throughout its range in California by widespread habitat loss due to urban development and agricultural intensification (Jennings and Hayes 1994).

#### Occurrence in the SVRA

Western spadefoots were observed in the vicinity of Oso Flaco Lake in February and March of 2000 (Schneider 2000). Western spadefoots were not observed in 2006, though a potential breeding pond for western spadefoot in the foredunes northwest of Oso Flaco Lake in May 2006 was identified (Appendix 4).

### f.) Southwestern Pond Turtle (Actinemys marmorata pallida)

#### **Taxonomy**

The taxonomic treatment of this species is in flux. Jennings (2004) has included the western pond turtle in the genus *Actinemys* while others have suggested that it be included in the genus *Emys*. This generic allocation to *Emys* has not yet been published in the Society for the Study of Amphibians and Reptiles "Scientific and Standard Names of amphibians and reptiles of North America north of Mexico, with Comments Regarding Confidence in Our Understanding" publication. The most recent version of this publication (Crother, ed. 2000) lists this species as *Clemmys marmorata pallida*.

#### Distribution

Historically, southwestern pond turtles occurred along most streams and rivers in Central and Southern California. Today, they can be found along the upper reaches of larger streams and rivers, in small-to-medium sized streams in foothill areas, and in man-made agricultural ponds, canals and reservoirs (Holland 1991, Jennings and Hayes 1994).

#### <u>Biology</u>

Within its above described habitat, this species generally selects slow moving or stagnant aquatic habitat that forms deep pools (at least three feet deep) that also have some sort of overhanging bank cover such as vegetation, tree roots, or boulders (Rathbun et al. 1991). The combination of deep pools with overhanging/undercut banks provides adult and sub-adult pond turtles with protected areas for escape when threatened. Suitable aquatic basking sites such as mats of emergent vegetation, submerged mats of aquatic vegetation, exposed logs, rocks, or



**Photo 38:** Southwestern Pond Turtle © 2003. Pierre Fidenci.

mud banks are also a critical element of aquatic habitat for adult and sub-adult pond turtles. Because hatchling and juvenile pond turtles are very susceptible to predation from birds and mammals, they tend to forage in shallow water habitat that has a dense submerged or short emergent cover of vegetation (P. Collins, pers. comm. 2005, Gevirtz et al. 2005).

Pond turtles also require suitable upland habitat adjacent to watercourses for overwintering and nesting (Rathbun *et al.* 1991). Typical overwintering sites include burrows in leaf litter or soil that are elevated above the stream channel (Rathbun *et al.* 2002).

### <u>Listing & Conservation Status</u>

The southwestern pond turtle is a California Species of Special Concern and is a candidate for Federal listing (Reese and Welsh 1997).

#### **Threats**

Alteration of wetland habitats from flood control projects, groundwater extraction and water diversions for agricultural, residential, and commercial use, along with alteration of upland habitats adjacent to wetlands used for nesting and overwintering have led to the decline and elimination of many populations of pond turtle throughout its range in California (Holland 1991, Jennings and Hayes 1994, Rathbun *et al.* 1991). Additional reasons for the species' decline include introduction of exotic species of turtles and other aquatic organisms (T. Hovey, *pers. comm.* 2005, Gevirtz *et al.* 2005).

#### Occurrence in the SVRA

In 2003 and previous years there were incidental sightings of southwestern pond turtles at the SVRA (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003)

Fourteen southwestern pond turtles were observed in Jack Lake in March 2006, one at the outlet of Oso Flaco Lake in April 2006, and one in the estuary north of

the mouth of Arroyo Grande Creek (immediately north of the Arroyo Grande Creek north levee) in April 2006 (Figure 6).

### g.) Silvery Legless Lizard (Anniella pulchra pulchra)

### **Distribution**

This species ranges from San Francisco Bay and the northern San Joaquin Valley southward along the margins of the Central Valley and inner Coast Ranges to the Transverse and Peninsular Ranges of Central and Southern California into northwestern Baja California Norte, Mexico (Stebbins 1985, Jennings and Hayes 1994).

### **Biology**

The silvery legless lizard is the only limbless lizard found in western North America. It is a highly specialized, sedentary, fossorial lizard which is a habitat generalist but a microhabitat specialist. It occurs in a broad range of habitats including coastal sand dunes, dune scrub, coastal scrub, chaparral, riparian scrub, oak woodland, and pine woodland (Stebbins 1985, Zeiner *et al.* 1988, L. Hunt, *pers. comm.*). The wide habitat affinities of this lizard belie its narrow microhabitat



**Photo 39:** Silvery legless lizard. *Photo by Katrina Burton.* 

requirements, which include a loose, sandy substrate in which to burrow, and abundant leaf litter beneath trees and shrubs in which to forage. Because this species uses head and body movements to burrow in the soil, they tend to occur on soils with a high sand content (Hunt 1993, unpubl. data).

Legless lizards may be active near the ground surface beneath cover objects or at the interface between the leaf litter layer and underlying soil throughout the year in some coastal areas. At inland locations this species is typically active near the surface between early November and late May, avoiding the high surface temperatures and low soil moisture regimes of the late spring, summer and early fall months (Hunt 1993, unpubl. data).

### <u>Listing & Conservation Status</u>

The silvery legless lizard (*Anniella pulchra pulchra*) is a California Species of Special Concern and a Federal Sensitive Species (former Category 2 species).

#### Threats

A variety of factors have contributed to the decline of this species in California including loss of habitat from urbanization and intensive agriculture, development of coastal dunes, and introduction of non-native plants such as veldt grass (Ehrharta calycina), ice plant (Carpobrotus edulis and related species), eucalyptus (Eucalyptus spp.), and other invasive plants, which displace native vegetation and

create unsuitable microhabitat conditions for silvery legless lizards (Jennings and Hayes 1994, Hunt 1993, unpubl. data, Gevirtz *et al.* 2005).

#### Occurrence at the SVRA

One legless lizard was incidentally sighted at the Pipeline vegetation island at the SVRA during 2003 (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003). Additionally, in March 2006 one legless lizard was observed in the ConocoPhillips alternative, two legless lizards were observed in the dunes within the Creek Road-Silver Spur Alternative, and in June, one legless lizard along the Little Oso Flaco alternative near the ConocoPhillips alternative was observed (Figure 6). Three of the lizards were found under Ericameria ericoides and two (the lizards observed in June) were found under a woodrat nest.

### h.) Two-striped Garter Snake (Thamnophis hammondii)

#### Taxonomy

Before being recognized as a full species, the two-striped garter snake (*Thamnophis hammondii*) was part of the *T. couchii* complex (California Department of Fish and Game 2005[b]).

#### Distribution

The two-striped garter snake is generally confined to coastal slope drainages in the Coast, Peninsular and Transverse Ranges from Monterey Bay southward through Baja California Sur, Mexico (Jennings and Hayes 1994, Stebbins 1985). The two-striped garter snake was historically common, but is now absent from 40 percent of its historical range (California Department of Fish and Game 2005[b]).

### **Biology**

Two-striped garter snakes are diurnal and are most active in the morning and early afternoon, though on cool days they may only be active during the afternoon. They bask on rocks and in vegetation along streams and generally retreat to the water when disturbed. At night garter snakes remain in crevices or holes such as mammal burrows (California Department of Fish and Game 2005[b]).

The two-striped garter snake is highly aquatic and is rarely found far from water, which it freely enters to forage or escape from predators. It commonly inhabits perennial and intermittent streams that have rocky bottoms and are bordered by willow thickets or dense vegetation (Stebbins 1985). This species is also known to occasionally utilize stock ponds and other artificially-created aquatic habitats as long as there is a dense border of emergent vegetation and suitable amphibian and fish prey present. Two-striped garter snakes are active from late February through September with peak activity occurring in June. By late September, this species retreats into nearby upland habitat where it aestivates in rock crevices and animal burrows that are out of reach of high water stream flows.

Garter snakes primarily forage in and along streams and ponds. They feed mainly on fish, especially trout, and amphibians but also take invertebrates and small mammals (California Department of Fish and Game 2005[b]).

Courtship and mating among two-striped garter snakes occurs shortly after they emerge from their burrows in the spring. In late summer the snakes give birth to from one to 25 live young (California Department of Fish and Game 2005[b]).

### <u>Listing Status</u>

The two-striped garter snake is a California Species of Special Concern.

#### **Threats**

Throughout its range this species has been adversely affected by alteration of its aquatic habitat from urban and agricultural developments, flood control activities, creation of reservoirs, and livestock grazing (Jennings and Hayes 1994). Introduced predators including bullfrogs, fishes, and feral pigs are also a threat to the two-striped garter snake (California Department of Fish and Game 2005[b]).

#### Occurrence at the SVRA

There were incidental sightings of two-striped garter snakes at SVRA in 2003 (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003).

Two-striped garter snakes were not observed during 2006 surveys; however, at least ten coast garter snakes (*Thamnophis elegans terrestris*) were observed on the south levee along Arroyo Grande Creek, in the vegetated back dunes of Pismo Dunes State Preserve (in the Creek Road-Silver Spur Alternative), and near Oso Flaco Lake.

#### i.) California Horned Lizard (Phrynosoma coronatum frontale)

#### Taxonomy & Distribution

The northern subspecies of California horned lizard (*Phrynosoma coronatum frontale*) occurs from Ventura County and western Los Angeles County northward to the Sacramento Valley. The southern subspecies: *blainvillii*, is found along the coastal slopes from approximately the Santa Barbara/Ventura County line southward into northwestern Baja California (Jennings and Hayes 1994, Stebbins 1985). Montanucci (2004) recently proposed combining the two subspecies blainvillii and frontale into a newly named species of horned lizard, *P. blainvillii*. This taxonomic reassignment has not yet been recognized by the Society for the Study of Amphibians and Reptiles.

#### <u>Biology</u>

California horned lizards are generally associated with loose, sandy loams and sandy-gravely soils that support scattered shrubs and an open canopy (Stebbins 1985, Zeiner *et al.* 1988, Jennings and Hayes 1994). Critical characteristics of habitats frequented by this species include open bare soil areas for basking, loose (sandy) soils for burrowing, and the presence of native harvester ants for foraging (Stebbins 1985). They forage on the ground on native ant nests. Besides ants, horned lizards are known to eat wasps, grasshoppers, flies, and caterpillars (Stebbins 1954).

Horned lizards are active above-ground between April and October, with most activity concentrated between April and June. During the remainder of the year they aestivate underground in mammal burrows or beneath cover objects such as

boulders and logs, or in rock crevices. Horned lizard activity patterns appear to be closely associated with specific air and soil temperatures (Hunt 1993, unpubl. data).

#### **Listing Status**

California horned lizard is a California Species of Special Concern and a Federal Sensitive Species (former Category 2 species).



Photo 40: California Horned Lizard.

### **Threats**

This species is threatened throughout much of its range in California due to widespread habitat loss (Jennings and Hayes 1994). Historically, California horned lizards were probably more widely distributed on sandy soils throughout the Central Coast; however, widespread urban and industrial development and agricultural intensification have destroyed large areas of sandy soil that would have been suitable for this species.

In addition to habitat loss, California horned lizards are also threatened by the indirect effects of Argentine ant (Linepithema humile), an exotic species in California. Argentine ants penetrate into natural areas from adjacent urban edges where they are more abundant (Suarez et al. 1998). In areas that are not invaded by Argentine ants, the diet of horned lizards consists primarily of native ants, particularly harvester ants in the genera Pogonomyrmex and Messor (Suarez et al. 2000). In areas invaded by Argentine ants, Suarez et al. (2000) found that most native ants were displaced, and remaining horned lizards incorporated more nonant arthropods and smaller ants into their diet. Furthermore, Argentine ants were never detected in horned lizard fecal pellets, suggesting that they are not a suitable replacement for the native species they are displacing (Suarez et al. 2000). Suarez et al. (2000) conclude that reserves need to be managed to prevent the penetration of Argentine ants in order to minimize their direct and indirect effects on natural communities (Gevirtz et al. 2005). In the Oceano Dunes, between Oso Flaco Lake and Arroyo Grande Creek, three species of ants (Camponotus, Formica, and one unidentified) were collected in 2006, but no Argentine ants were observed.

#### Occurrence at the SVRA

One adult California horned lizard was observed in the Little Oso Flaco Lake Alternative (near the ConocoPhillips Alternative) in June 2006 (Figure 6). The species is expected to occur throughout the dune scrub of the back dunes in the project area. California horned lizards may also occur in lower densities at the edges of riparian zones where that habitat intergrades with dune scrub.

### j.) Western Snowy Plover (Charadrius alexandrinus nivosus)

### **Taxonomy**

The western snowy plover (*Charadrius alexandrinus nivosus*) is one of two recognized subspecies of snowy plover in North America, the other being the Cuban snowy plover (*C. a. tenuirostris*) (U.S. Fish and Wildlife Service 2001[b]).

#### Distribution

There are approximately 2000 breeding adults on the pacific coast of the U.S. (Brown *et al.* 2001), and over 90% of these breed in California (Hickey *et al.* 2003). Western snowy plovers often return to the same nesting site each year and frequently maintain pair bonds from year to year (U.S. Fish and Wildlife Service 2001[b]).

### **Biology**

Western snowy plovers are 15-17 centimeters (5.9-6.7 inches) in length and weigh34-58 grams (1.2-2 ounces). They breed mainly on dune-backed beaches, sand spits, and beaches at creek and stream mouths. Bluff-backed beaches, dry salt ponds, and river bars are used less frequently. There are 133 known current or

historical snowy plover nesting sites in California. Western snowy plovers can be either migratory or year round residents. During winter, plovers form loose flocks and are found both on beaches where nesting occurs and on beaches where they do not nest (U.S. Fish and Wildlife Service 2001[b]).

#### Nesting

Nests, called "scrapes", are located in areas with small amounts of vegetation and driftwood or other debris that can be used as cover; these areas are also likely to contain the invertebrates that plovers eat. The



**Photo 41:** Western snowy plover Photo courtesy of California State Parks. 2004 [online].

breeding season on the California coast lasts from early March to late September with peak nesting from mid-April to mid-June. Generally a pair of plovers will lay two to four eggs, with three being the most common number. The eggs require approximately 27 days to hatch. Young plovers are precocial and leave the nest within hours of hatching, after which fledging requires approximately 28 days. Renesting is common after nest failure. It is also common for females to hatch

multiple broods in a single season with different mates (U.S. Fish and Wildlife Service 2001[b]).

After hatching has occurred, plover broods can travel up to 6.4 km (4 miles) from the nest with the adults leading the young to food and signaling the chicks to help them hide from predators. Most chick mortality occurs within six days of hatching, and after this initial six day period it is common for the female to leave the brood and find a new mate while the male remains with the chicks (U.S. Fish and Wildlife Service 2001[b]).

#### Listing & Conservation Status

The western snowy plover was federally listed as threatened under the Endangered Species Act in 1993 (U.S. Fish and Wildlife Service 2004[c]) and is protected under the Endangered Species Act. Because it is a migratory species it is also protected by the Federal Migratory Bird Treaty Act (U.S. Fish and Wildlife Service 2001[b]). In December 2004, 17,299 acres of critical habitat were proposed to be designated for the plover in California, Washington, and Oregon, with a court-established deadline of September 20, 2005, for the submission of the final critical habitat designation. In August 2002 the Surf Ocean Beach Commission of Lompoc, California submitted a petition to have the plover delisted, and a similar petition was submitted by the City of Morro Bay in May 2003. In March 2004 a notice was published in the Federal Register that delisting may be warranted (U.S. Fish and Wildlife Service 2004[c]). In April 2006, after the completion of the 12month finding on the petition, it was decided that delisting was not warranted and the petitions were rejected (U.S. Fish and Wildlife Service 2006[b]). At the same time a special rule was proposed to exempt "common recreational and commercial activities" in snowy plover habitat from take prohibitions in counties that have met specified goals. Intentional take would still be prohibited (U.S. Fish and Wildlife Service 2006[c]).

#### Critical Habitat & Habitat Conservation Plan Status

The U.S. Shorebird Conservation Plan lists the snowy plover in Conservation Category 5: Highly Imperiled, with the South Pacific Planning Region (which includes California) being rated as important for migration and extremely important for breeding and wintering (Brown *et al.* 2001).

Critical habitat for the snowy plover was proposed by the U.S. Fish and Wildlife Service and was described in the December 17, 2004 Federal Register (U.S. Fish and Wildlife Service 2004). A total of 17,299 acres of critical habitat was proposed in California, Oregon, and Washington. The proposed habitat included 1,269 acres in the Guadalupe/Nipomo Dunes Wildlife Refuge (U.S. Fish and Wildlife Service 2004[c]). An additional 234 acres of the Guadalupe/Nipomo Dunes region were excluded from the proposal because of the existing Guadalupe/Nipomo Dunes National Wildlife Refuge plover management plan (U.S. Fish and Wildlife Service 2004[c]). The final designation, published in the September 29, 2005 Federal Register, included 12,142 acres of habitat along the coasts of California, Washington, and Oregon. The habitat is divided into 32 units, 24 of which are in

California. The final ruling excludes six areas in California, including the Pismo Beach/Nipomo section of San Luis Obispo County based on an economic analysis. The excluded area includes Oceano Dunes SVRA (California Environmental Insider 2005).

California State Parks is currently preparing a Habitat Conservation Plan (HCP) for all State Parks within San Luis Obispo County, including the Oceano Dunes SVRA. The species covered by the HCP include the western snowy plover, California least tern and others. The HCP describes the measures the CDPR will undertake to avoid, minimize, and mitigate specified visitor and park operations impacts to the covered species. Consistent with State Parks' mission, the HCP is designed to accommodate recreational use within the covered parks while protecting and benefiting numerous populations of threatened and endangered species that occur within those parks (P. Hartman *pers. comm.* 2006).

### Threats

Threats to the western snowy plover include driftwood removal, human disturbances such as camping or kite flying, and predation. Driftwood removal is a problem for plovers as they depend on the wood for shelter and as a habitat for the invertebrates on which they feed. Removal of driftwood also leads to a reduction in both the number of suitable nest sites and the amount of protection from high winds and blowing sand that is available to the birds (U.S. Fish and Wildlife Service 2001[b]).

#### **Human Impacts**

Human activities can cause disturbances leading to nest abandonment or reduced alertness to predators if the plovers become accustomed to disturbance. A study at Point Reyes found that adults would leave the nest 78% of the time if people came within 50m, 57% of the time if people came within 50-100m, and 34% of the time if people came within 100-250m. These numbers increased to 100%, 65%, and 52%, respectively if dogs were present as well (U.S. Fish and Wildlife Service 2001[b]).

A study at Willapa National Wildlife Refuge, Leadbetter Point in Washington found that closing a nesting area to vehicles increased the number of young snowy plovers fledged per pair from 0.3 in 1978 to 1.2 in 1979. Fencing put up to protect other species, such as California least tern (*Sterna antillarum browni*), can also be problematic as plover chicks can become entangled in it or be separated from their parents depending on the type of fencing used (U.S. Fish and Wildlife Service 2001[b]). California State Parks reports that fencing used at the SVRA is not harmful to western snowy plovers and California least terns (J. Iwanicha *pers. comm.* 2006).

### **Predators**

Predators of the western snowy plover include loggerhead shrikes (*Lanius ludovicianus*) and American kestrels (*Falco sparverius*), which prey on chicks, as well as merlins (*Falco columbarius*) and peregrine falcons (*Falco peregrinus*), which prey on adults. Coyotes (*Canis latrans*), American crows (*Corvus brachyrhynchos*),

common ravens (*Corvus corax*), and numerous other species are also of concern. Introduced European and American beachgrasses (*Ammophila arenaria* and *A. breviligulata*) can be problematic as well because they reduce the amount of beach free of vegetation available for the plovers (U.S. Fish and Wildlife Service 2001[b]).

At the SVRA in 2003, nine nests out of a total of 95 are known to have failed due to predation. Of these at least five were due to common ravens (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003). In 2004, eight of a total of 113 nests at the SVRA were lost to predation (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2004). In 2005, one nest out of 107 was lost due to predation. In 2006, 12 nests out of 116 were lost to predation. Of these 12, four were lost to coyotes and six were lost to gulls (J. Iwanicha *pers. comm.* 2006).

### **Local Population & Management**

The U.S. Fish and Wildlife Service Biological Opinion of the Oceano Dunes State Vehicular Recreation Area anticipated that there would be some take of snowy plovers each year associated with vehicle use and other recreational activities. Specifically, the anticipated take included three complete nests per year in the form of either direct or indirect mortality as well as three chicks and one adult per year in the form of direct mortality. It was also anticipated that all western snowy plover broods would be harassed by being flushed out of suitable habitat or because of interference with their foraging and other essential behaviors (California Coastal Commission 2001). However, exclosure fencing and other measures implemented by California State Parks results in the absence of flushing and harassment for many broods located south of the southern exclosure (R. Glick pers. comm. 2006).

The Biological Opinion is no longer in effect. It has been replaced by an agreement known as the Take Avoidance Plan, which implements measures that were developed in conjunction with U.S. Fish and Wildlife Service, California Department of Fish and Game, and California Department of Parks and Recreation (2006[c]).

The number of snowy plover nests found at Oceano Dunes is highly variable. In 1978 there were no plovers found in the park and there was no suitable plover habitat available. Annual plover surveys were started in 1992, and in the period from 1992 to 2001, the number of plover nests ranged from 5 to 41 per year with an average of 22 nests per year during this period. Monitoring during this period found that hatching success is "somewhat proportional" to the number of nests in most years (California Coastal Commission 2001).

In the SVRA, predator control has made a significant contribution to snowy plover fledging success. Predator management began in 2003 (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003). The year before the predator management program was implemented, the fledge rate for snowy plovers at Oceano Dunes was 4%. The next year, when predator

management began, the fledge rate increased to 56%, with 35 out of 62 chicks fledging; this was one of the highest fledge rates in the State of California (California Department of Parks and Recreation 2003).

In addition to predator management the park has implemented several other strategies to help protect the western snowy plover and California least tern. These strategies have been developed based upon guidance, agreements, and permit conditions resulting from formal consultations with the Department of Fish and Game and the U.S. Fish and Wildlife Service. Furthermore, State Parks management actions are guided by the Biological Opinions and take avoidance concurrence letters issued for these species at the SVRA. Finally, population monitoring, annual reporting, law enforcement patrols and actions, prohibition of fireworks and kite flying, as well as adaptive management strategies proposed by the SVRA have been approved by these agencies and implemented by California State Parks (D. Doberneck *pers. comm.* 2006).

During the nesting season known nesting areas are fenced off to prevent human entry and minimize disturbance by preventing people from approaching the nests. In 2004, 95% of the snowy plover nests (one out of 63) in the park were within the exclosures (J. Iwanicha *pers. comm.* 2006). If nests are found outside of the fenced areas predator exclosures are put up to protect them. In addition to this, speed limits are enforced in the park to reduce disturbance and minimize the risk of having vehicles run over the plovers.

The park is also active in the area of public education. Visitors to the park are given brochures informing them of the presence of the western snowy plover and informing them of what to do to minimize their impact on the birds.

During the 2003 nesting season there were 84 breeding plovers and 95 nests at the SVRA. There was a 66% hatch rate producing 162 chicks. The main cause of nest failure was abandonment, with 19 of the 30 failed nests having been abandoned. A total of 107 (67%) of the hatched chicks fledged (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003).

During the 2004 nesting season the numbers of pairs and nests increased to at least 121 breeding plovers, 22 of which were banded birds that had hatched at the SVRA the previous year and six of which were previously banded birds that had bred at the SVRA the previous year. In 2004 the breeding birds produced 147 nests, of which 75% hatched at least one egg resulting in a total of 263 chicks. The main cause of nest failure was abandonment, with 16 of the 35 failed nests having been abandoned. Of the hatched chicks 66 fledged (25.5%). Predation is believed to have been a major cause of the low fledge rate (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2004).

Recent nesting locations are shown in Figure 6. Western snowy plovers were observed on numerous days in 2005 and 2006 on the beach and along the Arroyo Grande Creek lagoon channel. However, since this species is the subject of

intensive observation and management at the SVRA, it was not a focus of the present study; and observations of this species are not shown on Figure 6.

### k.) California Least Tern (Sterna antillarum browni)

### <u>Taxonomy</u>

The California least tern (*Sterna antillarum browni*) is one of three North American subspecies of least tern (Keane 2001).

### Distribution

The majority of least terns in California are generally concentrated at a small number of sites. In 1999, 76.6% of all pairs were found at only ten sites, and 24% of all fledglings came from a single site, Los Angeles Harbor (Keane 2001). Similar results were seen in 1997 with more than 50% of pairs and 64% of fledglings at six sites (Keane 1997) and in 1998 with 65% of pairs and 66% of fledglings at seven sites (Keane 2000). Since 1976, the breeding population of the California least tern has increased from 664 pairs to over 4,000 in 1997 (Keane 1997).

### **Biology**

The California least tern is the smallest tern found in the U.S. with a length of approximately 23cm (9 inches) (U.S. Fish and Wildlife Service 2001[b]). California least terns forage in shallow estuaries and lagoons, where they dive into the water seeking small fish (Pacific Biodiversity Institute 2005). They are migratory and it is believed that they winter in Central or South America, but the specific locations of their wintering sites are unknown. Least terns reach breeding age after two years. During the breeding season California least terns are found between the San Francisco Bay in the U.S. and Baja California Sur in Mexico (Keane 2001).

### **Nesting**

California least terns nest on sandy beaches and salt flats along the coast from April through August (Keane 2001). Nests are generally constructed in open areas of light colored sand or dirt and consist of small depressions which are often lined with shell fragments and small pebbles. Nests contain from one to four eggs, with two eggs being most common. Incubation requires 20-25 days with a mean of 21 days (U.S. Fish and Wildlife Service 1985). Least tern chicks are semi-precocial (California Coastal Commission 2001) and fledging requires approximately 20 days (U.S. Fish and Wildlife Service 1985). Young terns may remain at their nesting sites for up to three weeks after fledging (Keane 2001).

### Listing & Conservation Status

The California least tern was listed as a federally endangered species in 1970 (U.S. Fish and Wildlife Service 2001[b]) and was listed as an endangered species by the State of California in 1971 (Keane 2001). No critical habitat has been designated for the California least tern.

#### **Threats**

The major threats to the California least tern include El Niño events, habitat destruction, and predation. El Niño events and large



Photo Photographer unknown

California least

winter storms can affect water temperature and salinity, which in turn affect prey availability, potentially leading to increased chick mortality through starvation (Keane 2001).

### **Human Impacts**

Habitat destruction is a concern for the least tern. As more development occurs in coastal environments and good breeding sites are destroyed many terns are moving to less desirable mud flats and landfills away from the ocean. Currently over one-third of California least terns breed on Navy and Marine Corps bases, which are generally remote and off limits to the public, reducing the amount of development and disturbance encountered by the birds (Pacific Biodiversity Institute 2005).

#### **Predators**

Predation is mainly a concern for eggs and chicks, though predation of adults also occurs on occasion. Egg predation is mainly by coyotes (Canis latrans), crows (Corvus brachyrhynchos), and ravens (Corvus corax); chick and fledgling predation is mostly by peregrine falcons (Falco peregrinus), red-tailed hawks (Buteo jamaicensis), and coyotes (Keane 2001). Introduced predators such as red foxes (Vulpes vulpes) and pets such as dogs and cats are also a growing problem (Pacific Biodiversity Institute 2005). In 2003, three out of 79 nests at the SVRA were lost to predation (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003). In 2004 one out of 63 nests, and in 2005 one out of 59 nests were lost to predation (J. Iwanicha pers. comm. 2006).

### Local Population & Management

The Department of Parks and Recreation began monitoring California least terns in 1991. At Oceano Dunes an average of two nests were found each year until 1997. In 1998, 37 pairs produced 40 nests and 25 fledglings in 1998 (Keane 2000), and in 1999, 24 pairs produced 34 nests and seven fledglings (Keane 2001). The decrease from 1998 to 1999 is believed to be due to predation and prey deficiencies (Keane 2001). More recently, the number of nests has increased again, with 79 nests in 2003 (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003) and 63 in 2004 (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2004).

In 2003 there were 53 breeding pairs of California least terns at the SVRA. Of the 79 nests found that year, 75.9% hatched at least one egg, resulting in a total of 101 chicks. The main cause of nest failure was abandonment, with six out of 17 failed nests having been abandoned. A maximum of ten fledglings were observed at one time in the park, but it is not certain that they all hatched in the park as they were not banded (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003).

In 2004, there were fewer nesting terns at the SVRA. It was estimated that there were 47 breeding pairs, and 63 nests were found. The hatch rate for 2004 was at least 70%, resulting in a total of 69 chicks. The main cause of nest failure was abandonment, with nine of the 16 failed nests having been abandoned. Of the 69 hatched chicks a minimum of 25 were estimated to have fledged (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2004). While productivity of this species (as well as of western snowy plover) is high at the SVRA, success (measured by fledging) may be low. Additional management actions that would lead to higher percentages of fledging may be warranted.

Recent nesting locations are shown in Figure 6. California least terns were observed on the beach on multiple days in 2005 and 2006. However, since this species is the subject of intensive observation and management at the SVRA, it was not a focus of the present study. Individual California least terns were observed hunting over Arroyo Grande Creek and Oso Flaco Lake in 2006 as shown in Figure 6.

The U.S. Fish and Wildlife Service Biological Opinion of the SVRA anticipated that there would be some take of California least terns each year associated with vehicle use and other recreational activities. The anticipated take included one complete nest per year in the form of direct or indirect mortality and one chick or adult tern per year through direct mortality. The harassment of one or two broods per year by being flushed from suitable habitat or by having their foraging or other essential behaviors interfered with was also anticipated (California Coastal Commission 2001).

The Biological Opinion is no longer in effect. It has been replaced by an agreement known as the Take Avoidance Plan, which implements measures that were developed in conjunction with U.S. Fish and Wildlife Service, California Department of Fish and Game, and California Department of Parks and Recreation (2006(c). The SVRA has implemented several techniques to help protect the California least tern. During the nesting season known nesting areas are fenced off to prevent human entry and minimize disturbance by preventing people from approaching the nests. In 2004 only one California least tern nest was found

outside of the fenced area (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2004).

If nests are found outside of the fenced areas (Photo 28) predator exclosures are put up to protect them. In addition to this, speed limits are enforced in the park to reduce disturbance and minimize the risk of having vehicles run over the terns. The SVRA is also active in the area of public education. Visitors to the park are given brochures informing them of the presence of the California least tern and informing them what to do to minimize their impact on the birds. Additional management actions at the SVRA are described above in the discussion regarding management of western snowy plover.

### Management Techniques for Western Snowy Plover and California Least Tern

### Management at the SVRA

California State Parks has implemented its Take Avoidance Plan which includes

several of the management methods described above such as weekly monitoring of snowy plovers, enforcement of leash laws, and enforcement of 15 mph speed limits on the beach (California Department of Parks and Recreation 2006 (c).

The SVRA also uses predator exclosures. Individual nest exclosures consist of a five foot high fence made from 2x4 inch (5x10cm) wire mesh and buried 6-8 inches (15-20cm) under the sand. Plover exclosures may also have a 4x4 inch mesh roof if avian predators such as crows or ravens are



**Photo 43:** Fenced exclosure around least tern nest. July 2005. *Photo by Elihu Gevirtz.* 

present. This type of roof is not used on tern nests, as adult terns enter and leave their nests from the air (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2004). If a nest is found within 50m of a restroom facility, that facility is moved or closed and fencing is established (County of San Luis Obispo 2005 [b]).

Since 2003, the SVRA has had a predator management plan. This plan includes the selective removal or relocation of both avian and mammalian predators that threaten the reproductive success of either the western snowy plover or the California least tern at the park (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003).

Monitoring is conducted annually by California State Parks Environmental Scientists and seasonal park staff. Once gathered, survey data are compared to both the previous year and to 1998, the base year (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003). A banding program is used in conjunction with the monitoring program. Banding of snowy plover chicks at the park began in 1998. Chicks are banded with a color

combination that is unique to each brood. Banding of California least terns began in 2003, and all banded chicks were given a color combination unique to Oceano Dunes SVRA (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003).

Public education programs are also used at the SVRA. First time visitors are provided with informational flyers or pamphlets providing information on both plovers and terns, visitors are provided with garbage bags to remove their garbage to help protect the birds, an AM radio station provides information during the plover and tern breeding seasons, and volunteers are used in several programs (County of San Luis Obispo 2005 [b]).

The Habitat Conservation Plan (HCP) being developed by California State Parks for all of the coastal parks in San Luis Obispo County, including Oceano Dunes SVRA would include protections for the western snowy plover and California least tern only in the non-riding areas of Oceano Dunes. These protections would include predator exclosures, monitoring, predator control, signage and enforcement of park regulations, outreach and public education, and staff training (P. Hartman *pers. comm.* 2006).

### 1.) Southwestern Willow Flycatcher (Empidonax traillii extimus)

### <u>Taxonomy</u>

The southwestern willow flycatcher (*Empidonax traillii*) is one of 11 species of flycatcher that breed in North America (U.S. Fish and Wildlife Service 2002[b]). There are three subspecies of willow flycatcher in California (Green *et al.* 2003). The subspecies that could occur at the Oceano Dunes SVRA is *Empidonax traillii extimus*.

#### Distribution

The southwestern willow flycatcher formerly bred commonly throughout both lowland and montane areas of California (California Department of Fish and Game 2005[b]) wherever willow thickets were present (Sanders and Flett 1989). Currently the flycatcher is only known to breed in scattered populations of five to fifty pairs in meadows in the Sierra Nevada range and along the Santa Ynez, San Luis Rey, Kern, and Santa Margarita rivers (California Department of Fish and Game Habitat Conservation Planning Branch 2005). There may also still be breeding populations in other lowland areas of Southern California such as San Diego County, but there are no definite records of this (California Department of Fish and Game 2005[b]).

### **Biology**

The southwestern willow flycatcher is a migratory insectivorous bird. It arrives in North America in May and June, and departs for its winter territories in Central and South America in August (California Department of Fish and Game 2005[b]). Male flycatchers generally arrive approximately one week before female flycatchers (Green *et al.* 2003).

The southwestern willow flycatcher generally occupies broad, open river valleys and mountain meadows. Dense willow thickets are required by the flycatcher for nesting and roosting. Southwestern willow flycatchers sing and hunt from low exposed branches, and build nests in upright forked branches (California Department of Fish and Game 2005[b]).

The main food source for flycatchers is insects, but seeds and berries are also eaten on occasion (California Department of Fish and Game 2005[b]). Insects are either picked off of branches, or, more commonly, caught while flying. The flycatcher will sit on a perch, and when an insect is spotted will make a short flight (generally less than one meter [3.3 feet]) to catch the insect before returning to the perch (Sanders and Flett 1989).

### **Nesting**

Southwestern willow flycatchers are monogamous (California Department of Fish and Game 2005[b]) but there is some evidence that mate fidelity between years is low (Green *et al.* 2003). Southwestern Willow Flycatchers construct open cup nests in upright forks of the branches of willows or other shrubs. Three to four eggs are laid per clutch, with peak egg laying occurring in June. Eggs are incubated for a period of 12-14 days. Young flycatchers are altricial and require 13-14 days to fledge (California Department of Fish and Game 2005[b]). After fledging, young Southwestern Willow Flycatchers remain in the natal area for at least 14 days (Green *et al.* 2003).

### Listing & Conservation Status

The southwestern willow flycatcher, including all subspecies, was listed as endangered by the State of California in 1991 (California Department of Fish and Game Habitat Conservation Planning Branch 2005). One subspecies (*Empidonax traillii extimus*) was listed as federally endangered in 1995. Critical habitat for the southwestern willow flycatcher was designated but was later set aside and is currently being re-proposed (U.S. Fish and Wildlife Service 2002[b]).

#### Threats

The main threat to the southwestern willow flycatcher is habitat destruction, especially the loss of lowland riparian areas (Sanders and Flett 1989).

Livestock grazing is also a major concern. Heavy grazing of willows has been found to reduce willow flycatcher populations, likely because it removes the low branches used for singing and hunting (California Department of Fish and Game 2005[b], and produces suitable habitat for brown-headed cowbirds. (*Molothrus ater*). Nest parasitism by brown-headed cowbirds has been found to be a serious problem for willow flycatchers at lower elevations (Sanders and Flett 1989).

Predation is another concern for the willow flycatcher. Nest predation rates of as high as 51% have been recorded in the Sierra Nevada. Known nest predators include the milk snake (*Lampropeltis triangulum*), common kingsnake (*Lampropeltis getulus*), red-tailed hawk (*Buteo jamaicensis*), and Cooper's hawk (*Accipiter Cooperii*).

Little is known about predation of adults, but it is assumed that predators specializing in passerines would hunt flycatchers (Green *et al.* 2003).

#### Occurrence at the SVRA

Southwestern willow flycatchers were observed at the SVRA during the terrestrial bird survey conducted in May and June 2003 (California Department of Parks and Recreation Off-Highway Motor Vehicle Division 2003).

Surveys for southwestern willow flycatcher were conducted on the afternoon of June 20, the morning of June 21, and the morning of June 30, 2006, that included playing back taped calls. Surveys were conducted at Arroyo Grande Creek, Jack Lake, and the riparian section at Oso Flaco Lake and Little Oso Flaco Lake. These surveys were not protocol standard for determining presence or absence. No Southwestern Willow Flycatchers were observed.

### m.) Loggerhead Shrike (Lanius ludovicianus)

#### Distribution

Loggerhead shrikes are common year round residents in lowlands and foothills throughout California, though some individuals from the northern part of their range will move farther south in winter. The preferred habitat of loggerhead shrikes is open areas with scattered shrubs, posts, and other perches. They are often found in agricultural areas, but are rarely found in heavily urbanized areas (California Department of Fish and Game 2005[b]).

### **Biology**

Loggerhead shrikes are territorial, and defend their territories year round. They mainly feed on large insects, though small birds, mammals, amphibians, reptiles, fish, carrion, and invertebrates are also seen as prey. Shrikes hunt from perches that are at least 0.6m (2 feet) above the ground. While it sometimes hovers while hunting, the loggerhead shrike generally flies directly to its prey. Once killed, prey is often impaled on a thorn or piece of barbed wire or cached in the crotch of a tree to be consumed later (California Department of Fish and Game 2005[b], Gevirtz *et al.* 2005).

#### Nesting

Loggerhead shrikes build their nests in dense shrubs or trees. Four to eight eggs are laid per clutch between March and May, and double brooding may occur. Incubation takes 14-15 days. Young are altricial and require 18-19 days to fledge. Two to three months after fledging young shrikes are driven out of their parent's territory (California Department of Fish and Game 2005[b]).

### **Listing & Conservation Status**

The loggerhead shrike (*Lanius ludovicianus*) is a California Species of Special Concern (California Department of Fish and Game Habitat Conservation Planning Branch 2005).

### Occurrence at the SVRA

Loggerhead shrikes were observed at the SVRA in May and June 2003 (California Department of Parks and Recreation Off-Highway Motor Vehicle Division 2003). This species is regularly observed associated with the predator management activities associated with the western snowy plover and California least tern program (R. Glick



**Photo 44:** Loggerhead Shrike © 2004. Stephen Dowlan.

*pers. comm.*). One loggerhead shrike was observed at the railroad tracks in the ConocoPhillips Alternative in July 2005, two flying near Jack Lake in 2006 (one in March and one in June), and one on ConocoPhillips property between the highway and the railroad tracks in June 2006 (Figure 6).

### n.) Burrowing Owl (Speotyto [=Athene] cunicularia)

#### Distribution

Burrowing owls occur in dry, sparse grassland and agricultural areas, and use ground squirrel burrows for roosting and nesting. Burrowing owl now appears to only be a winter visitor to the coast (T. Edell, pers. comm. 2006), and hasn't bred along the Central Coast of California for the last 15-20 years (M. Ball, pers. comm. 2006). Breeding does, however, continue to occur in scattered locations inland (M. Ball, pers. comm. 2006). One or two pairs nested in the western Santa Maria Valley in the mid 1990s and another pair may have nested in the Cuyama Valley (Lehman 1994). Breeding still occurs in the Carrizo Plain in San Luis Obispo County. The stronghold for burrowing owls in California is most likely state and federal wildlife refuges, and the population at San Luis National Wildlife Refuge is estimated at 25 pairs (L. Littlefield, pers. comm. in California Department of Fish and Game Habitat Conservation Planning Branch 2006). There have been no recent records of burrowing owl breeding along the south coast (T. Edell, pers. comm. 2006).

### Listing & Conservation Status

Burrowing owl is considered a California Species of Concern.

#### Threats

Conversion of grasslands and pasturelands to cultivation and destruction of ground squirrel colonies have been the main factors causing the decline of the burrowing owl population (Zarn 1974 in California Department of Fish and Game Habitat Conservation Planning Branch 2006). "Assimilation of poisons applied to ground squirrel colonies has probably also taken a toll. Their propensity for

nesting in roadside banks also makes them particularly vulnerable to roadside shooting, being hit by cars, road maintenance operations, and general harassment" (California Department of Fish and Game Habitat Conservation Planning Branch 2006).

### Occurrence at the SVRA

Burrowing owls utilize the park during migration, but have not been documented breeding within the area. State Parks staff observed one burrowing owl near the chemical toilets on the beach in 2005 and 2006 (A. Zilke *pers. comm.* 2006). One burrowing owl was observed at the project site along the ConocoPhillips alternative in March 2006, along with two possible burrows and pellets in close proximately to the bird (Figure 6). The site was revisited in June 2006, but the owl was not observed at that time.

### o.) Northern Harrier (Circus cyaneus)

#### Distribution

Northern harriers occur in coastal areas of the Central Coast of California, the central valley, northeastern California, and the Sierra Nevada region up to 3,600 feet. Extensive local population declines are continuing to occur as habitat is lost (Remsen 1978, Martin 1989, MacWhirter and Bildstein 1996).

### Biology

Northern harriers forage and breed in wetlands, meadows, and grasslands, or along the edge of sloughs (Harrison 1978). Nests are located near water and are constructed on the ground, usually in marshy areas and grasslands. The female does most of the nest-building, using sticks, twigs, straw, and grass. The usual clutch size is five eggs, but occasionally as many as nine are laid. The incubation period is 29-30 days (Harrison 1979). Young begin flying at about 37 days. At that time, they start to leave the nest for short periods of time, but are still provided food by the parents.

### **Listing & Conservation Status**

The northern harrier, formerly known as "marsh hawk," is listed as a Species of Special Concern by CDFG.

#### Threats

Declines in population numbers of this species throughout California were noted as early as the 1940s (Grinnell and Miller 1944). The declines have been especially noticeable in the San Joaquin Valley. Loss of marshlands and other wetland habitats has been the principal reason for population decreases, but intense livestock grazing in grasslands may have also contributed by reducing the amount of breeding habitat available.

### Occurrence at the SVRA

Northern harrier is uncommon in the winter in the Oceano Dunes and a "rare, but apparently regular breeder in the Oso Flaco Lake area and perhaps elsewhere

between the Santa Maria River mouth and Oceano" (T. Edell, *pers. comm.* 2006). One northern harrier was seen flying over Oso Flaco Lake in April 2006, and one flying over willows and dune scrub near the lake in May 2006 (Figure 6).

### p.) Yellow Warbler (Dendroica petechia)

#### Distribution

A long distance migrant, yellow warblers are on breeding territory by mid-April and begin to leave breeding habitats by mid-July. They migrate northwards through the central coast area from April through the third week of June and southwards from July to October or later (Lehman 1994, Gallo et al. 2000, T. Holmgren *pers. comm.*). In California, yellow warblers breed in lowland and foothill riparian habitats west of the Sierra Nevada and, at least formerly, in some desert oases to the east (Gevirtz et al. 2005). Along the coast, yellow warblers are restricted primarily to inland valleys and southern coastal plain locations such as Oso Flaco Lake, lower Arroyo Grande Creek, and at Oceano where its numbers appear to be decreasing (T. Edell *pers. comm.* 2006).

### **Biology**

While yellow warblers sing mainly from the canopy, they may forage and nest in the understory. Therefore, the condition of the understory may influence their occupancy and success while breeding. This species breeds in riparian woodlands characterized by a canopy of tall willows, black or Fremont cottonwoods (*Populus balsamifera var. trichocarpa, or P. fremontii*), big-leaf maple (*Acer macrophyllum*), western sycamore (*Platanus racemosa*), or white alder (*Alnus rhombifolia*). Oak woodland, especially near riparian, is also used occasionally.

### Listing and Conservation Status

Yellow warbler is considered a Species of Special Concern by the California Department of Fish and Game.

#### Threats

The decline in breeding populations of yellow warblers throughout much of southern California has been linked to the loss and degradation of riparian habitats and to intense brood-parasitism (Lehman 1994). It is indeed one of the favored hosts of brown-headed cowbirds (T. Holmgren *pers. comm.*). Cattle grazing has been shown to have a negative influence on occupancy. When cattle are removed and shrub density recovers, the yellow warbler population responds positively (Taylor and Littlefield 1986).

### Occurrence at the SVRA

This species was observed in 2006 at Arroyo Grande Creek, Jack Lake, Oso Flaco Lake, and Little Oso Flaco Lake.

### q.) Swainson's Thrush (Catharus ustulatus)

### **Distribution**

Swainson's Thrush migrates through North America from its nesting grounds in Canada and mountainous regions of eastern and western U.S. to its wintering grounds in the tropics (Alsop 2001). It is a common summer resident along the central coast. It was formerly more common and widespread (Lehman 1994). Typical areas of occurrence in the region include the willow riparian forests at the Santa Maria River mouth, lower Arroyo Grande Creek, Oso Flaco Lake, Oceano, Montana de Oro State Park, Reservoir Canyon, and along most of the north coast creeks (T. Edell *pers. comm.* 2006).

### <u>Biology</u>

The habitat requirements of Swainson's thrush are fairly narrow. For breeding it uses lush, moist shrubby or vine-thick terraces in or near canopied broad floodplain riparian or oak riparian forest. Nests are placed low in thickets of blackberry or Clematis, for example. Leaves and mud are essential for nest formation. Most of these settings are in perennial wetlands (Gevirtz et al. 2005). This species migrates in flocks at night, calling in the darkness, often traveling in mixed flocks with other thrushes, vireos, and wood warblers (Alsop 2001).

#### Listing and Conservation Status

Swainson's thrush is not considered a Species of Special Concern by the Department of Fish and Game but is considered locally important due to its disjointed breeding distribution, and because it is near the far southwestern corner of its breeding range (Holmgren *pers. comm.* 2005).

It is vulnerable to habitat loss from logging and deforestation on breeding and wintering grounds (Alsop 2001).

### Occurrence at the SVRA

This species was observed in 2006 at Arroyo Grande Creek and Little Oso Flaco Lake.

### r.) American Badger (Taxidea taxus)

#### Distribution

American badgers now "survive only in low numbers in peripheral parts of the [Central] valley and adjacent lowlands to the west in eastern Monterey, San Benito and San Luis Obispo counties" (California Department of Fish and Game Habitat Conservation Planning Branch 2006). They breed regularly along the coast of northern Santa Barbara County and southern San Luis Obispo County (M. Ball, pers. comm. 2006), and their population in San Luis Obispo County appears stable (B. Stafford, pers. comm. 2006).

### **Biology**

The preferred habitats for American badger include grassland, oak savannah, and sparse coastal scrub and their principal prey include California ground squirrel (*Spermophilus beecheyi*), agile kangaroo rat (*Dipodomys agilis*), and Botta's pocket gopher (*Thomomys bottae*) (Williams 1986). They are typically found anywhere there are California ground squirrel dens (B. Stafford, *pers. comm.* 2006).

### Listing & Conservation Status

American badger is listed as a California Species of Special Concern (Williams 1986), and is expected to be included on the watch-list on the update that has been prepared for the Mammal Species of Special Concern in California (Brylski, *in review*). Badgers are also considered of local concern by regional wildlife biologists.

### Threats

This species' decline noted by Williams (1986) has been attributed to conversion of grasslands and pasturelands to agricultural and urban uses, as well as to trapping and poisoning.

### Occurrence at the SVRA

Badgers have been observed by biologists in dunes immediately south of Oceano (B. Stafford, *pers. comm.* 2006). One adult badger using a den (possibly a natal den) in the ConocoPhillips alternative was observed in May 2006. Numerous other inactive badger dens and digs were observed throughout the project area (Figure 6).

Insert Figure 6-Wildlife

### V. ARCHAEOLOGICAL FEATURES

### A. Prehistory and Early History

The Oceano Dunes are in the southern portion of San Luis Obispo County, extend inland about two miles, and include about 4 miles of beach backed by sand dunes between the mouth of Arroyo Grande Creek and Oso Flaco Lake. Chumash Obispeño dialect speakers and their ancestors have occupied this region for over 10,000 years.

The general region along the south part of the San Luis Obispo Bay from Oceano to Mussel Rock has been recognized as an important archaeological study area. A number of archaeological reports spanning the past 20 years have identified cultural resources in this coastal area and outlined general and specific research questions related to them (Hoover 1967, 1975, 1977, Spanne 1979, 1980, Gibson 1993).

In the past 10,000 years, the Ancestors of the Chumash have seen many changes in the environment and coastal landscape. During the end of the last Ice Age, when water was stored in the continental glaciers, the sea level was about 92 meters (300') lower than it is today. The shoreline would have been about 7 to 10 kilometers (4 to 6 miles) west of the modern shoreline. As the Ice Age ended and temperatures warmed, sea level began rising perhaps by 2 cm per year and the flat coastal terraces were submerged and eroded up to 2 meters per year. By about 7,000 years ago, sea level had risen to about 15-20 meters below today's level. With the increase in rainfall, valley streams would have been raging torrents at times inundating their entire valley as stream systems tried to maintain grade with the rising shoreline (Parsons *in* King, Parsons, and Gibson 1989).

By about 4,000 to 5,000 years ago, sea level rise had fallen to only 1-2 mm per year, or 10 times slower that earlier periods. Streams were able to aggrade their valley surfaces and maintain grade with the sea level. Lower valleys began to fill with alluvial deposits that helped stabilize shorelines and created sandy beaches. Along much of the SLO county coast, rocky coast habitats were replaced by sandy beaches during this time period

Climate during the Early Holocene was cooler and more moist than at present, possibly being similar to that of the Monterey area today. During the middle Holocene, (circa 7,000 to 4,000 years ago), was a time of increased aridity when it was warmer and drier than today. After 4,000 years ago, conditions became slightly cooler and moist, and minor fluctuations in temperature and rainfall continued up to the present time. Today the Cambria and Cayucos area has a Mediterranean climate with moderate temperatures year-round and about 15 to 20 inches of rainfall, primarily from November to March. Sea fogs and westerly blowing winds are frequent.

Although deer, bear, and mountain lion are the only large non-domestic mammals living in the area today, Fages in 1769 noted bears, wild sheep, and antelope in the mountains. Elk are known from archaeological sites in the San Simeon Creek area (Gibson 1979). Fages also noted rabbit, hare, squirrels, and a wide variety of fowl and trout. Marine

resources including sea mammals, fish and shellfish are abundant in the region. Rocky coast habitats support over three dozen species of shellfish including mussel, sea snail, abalone, barnacle and crab. Nearby offshore the kelp beds combine with rocky habitats to support abundant and varied resident fish population. During the winter, schooling fish such as sardines, smelt, and mackerel are abundant off shore.

This project is within the territory historically occupied by the Obispeño Chumash, the northernmost of the Chumash speaking peoples of California (Kroeber 1953; Gibson 1990; Greenwood 1978). Archaeological evidence has revealed that the ancestors of the Obispeño settled in San Luis Obispo County over 9,500 years ago. Following an annual cycle of hunting, fishing, fowling and harvesting, the Chumash peoples adapted to changing environmental and social conditions and grew into a large complex society that persists today. Aboriginal society underwent major changes soon after Spanish contact in A.D. 1769, primarily due to the introduction of epidemic European diseases and the consequent high mortality rate.

The long history of the Chumash and their ancestors has been divided into three major periods, Early, Middle and Late, based on general patterns of social, technological and subsistence changes observable in the archaeological record (King 1990). A brief description of these three major periods follows below.

The Early Period (9,000–1000 BC.) is the first period in California with sites that represent remains of permanent settlements with associated cemeteries. The earliest site in San Luis Obispo County is at Diablo Canyon, CA-SLO-2 with radiocarbon dates of about 8,900 to 9,300 years old (Greenwood 1972). While a number of sites along the San Luis Obispo coast are known to exist prior to 8,000 years ago, very few have been discovered between 8,000 and 5,500 years old. The rare occurrence of archaeological sites in this 2,500 year period may be due to the Altithermal, a very dry warm period in California history when populations may have decreased or been clustered near permanent water sources. After 5,500 years ago, many sites are again occupied. Coastal sites north of the project area in this later part of the Early period are known from Diablo Canyon, the Morro Bay sand spit, Toro Creek, Cayucos, Cambria, San Simeon Creek, and elsewhere.

Artifacts and food remains recovered from these early contexts indicate that people living along the coast were fishing with bone hooks, sometimes using boats or rafts and occasionally taking sea mammals and fish as large as swordfish, tuna and white shark, among many other species) (King 2000:37). Deer and other bones, stone points and knives indicate that hunting was important. Residential sites often contain milling stones and manos used to process small seeds. During much of the Early period, it is believed, society was organized as egalitarian, so that anyone could attain positions of power and wealth. Political power was largely dependent on the acquisition of wealth and ritual power.

During the later phases of the Early Period, Olivella barrel beads were the dominant type of bead used throughout Chumash territory. Olivella barrels require additional grinding of the base and often the spire to reduce the size of the bead which increases the manufacturing costs of this type of bead (King 1990). This increase cost per bead is

suggested to indicate that these beads were used in economic contexts. The increasingly standardized size of the Olivella barrels and clam discs throughout the Early period also suggests both were used in changing and developing economic exchange systems. Often early settlements were small hamlets defensively situated on elevated landforms. Throughout the Early period while most villages contained 30 to 60 people, some settlements increased in size to several hundred.

The end of the Early Period and beginning of the Middle Period (between 1000 BC. and 600 BC.) is marked by changes in ornaments and other artifacts, which indicate the development of hereditary control of political and economic power. Cemeteries in this time period indicate a separation of "church and state", between chiefs and priests or religious leaders. Towards the end of the Early period, milling stones decreased in frequency as mortars and pestles became more common. Subsistence patterns appear to shift from small seeds to larger nuts (particularly the acorn and islay) and fruits, and more storage of these foods. Social and marriage networks were established to regulate these food stores and to even out fluctuations of the acorn harvest in different regions. Also during the Middle period, there was an increase in importance of fishing from boats with fish becoming a more important food resource. Village locations during this period tended to be less defensive in nature, as villages became integrated into larger political units to promote inter-village and inter-regional trade.

The Early period economic system employed clam disc/cylinder beads and Olivella barrels. However, both types of beads became very rare in the Middle period indicating a major change in the utility of economic systems during this time period. During the Middle period, political control systems and not economic systems were adequate to regulate the Chumash society. The most common bead was Olivella saucers (discs) that were used in necklaces during political exchanges between village chiefs and other high status members of the society. The villages during the Middle period grew larger in size and number. Towards the end of the Middle period, there was a shift from the use of large points to small projectile points with bows and arrows becoming common throughout California after about A.D. 500 to 700.

The Late Period (A.D. 1150–1790) is marked by the differentiation of new bead types indicating new economic subsystems were again necessary to regulate the growing Chumash society. This later economic system switched to Olivella callus beads (cup, lip, and cylinders) and produced a greater volume of money and invested more energy per bead in the economic system than the Early period populations. During the 800 years the Late period economic system was operating, the beads became larger (i.e., less grinding time and cheaper) and more numerous. This healthy trend in economic systems is commonly known as inflation.

Large trade centers were established and there was a rapid growth in all aspects of Chumash society. Many small sites were also established during this period as response to the growth of an economic system that supported more specialists and intensive exploitation of many different resources. Ritual objects were seldom owned by individuals but rather controlled by institutions. Chiefs and many other important political and social positions were inherited along "royal" family lines. Social and political organizations

encompassed most of the Chumash nation from Malibu to the San Luis Obispo/Monterey County line.

Archaeological site surveys along the coast from the Pismo dunes, south to Mussel Point (south of the Santa Maria River) indicate that the permanent occupation sites tend to be established in the few spots with south-facing beaches, often near rocky shore collection areas, in situation of relative shelter. With one possible exception, the Oceano dunes did not support permanent settlements, but contained primarily temporary campsites. These may have been seasonal extensions of major villages located inland along the major rivers or crests of mesas. Part of the population probably was utilizing shellfish at these camps only during part of the year. The beach itself was probably the main corridor of communication. Patterns of seasonality and food preparation activities have subsequently formed the basis of regional research.

Aboriginal society underwent major changes soon after Spanish contact in A.D. 1769, primarily due to the introduction of epidemic European diseases and the consequent high mortality rate. At the beginning of the Spanish mission, the Chumash occupied a number of various sized villages or rancherias.

### **SPANISH EXPEDITIONS IN 1769 AND 1770**

The first time Spanish diaries of land expeditions mention Chumash from near the Oceano Dunes area was on September 1 1769 when Don Gaspar de Portola' left San Diego with about 63 men and 180 animals to search for Monterey Bay. They returned through the Oceano Dunes area in December of that same year. The following year the Spanish again passed through the project area in May of 1770. Diaries were kept by a number of people on the expedition but the most detailed diaries were written by Friar Juan Crespi. These have mostly been translated and utilized in many studies over the years (Squibb 1968, Landberg 1965, King 1984). Some un-published portions of diaries of the Portola' 1770 expedition were also translated by Alan Brown, University of Arizona and also utilized in various reports.

The first Spanish expedition on September 1, 1769 noted of the Guadalupe area:

"we descended to a beautiful valley, about 3 leagues long (7.8 miles). In the middle of it where is a very large lake, more than five hundred varas wide and of unknown length, for we could not see the end and it is surmised that it reaches into the sea. All along its banks there is a great deal of tule, many cottonwoods, and pastures without end. We pitched camp near the water. There are two villages, one small and the other larger, and as soon as we arrived the people came to visit us and made us gifts of some baskets of pinole, handfuls of feathers and the seeds that they use. The water of this lagoon comes from a spring, and if it could be taken out, much land could be placed. It is a very delightful place and the view takes in the whole of the large valley. We gave it the name of Laguna Grande de San Daniel (Bolton 1926:167-168 in King 1984:I-30). There were in this valley, two Indian villages: one small and miserable, the other larger, being composed of several small houses (Teggart 1911:55)".

On September 2, 1769, the expedition set out from Arroyo Grande Creek Lagoon at Guadalupe Lake:

"and crossed the plain which is about two leagues in extent. By the direction that we followed, which is northwest, the remainder of the way was over mesas as far as the next water, and we covered in a day's mach about three leagues (7.8 miles). The watering place is a large lake nearly circular in shape, in a valley, and it is enclosed by some sand dunes that retain the water and prevent it from going to sea. The entire valley, which runs from east to west, is covered with rushes and grass, and the ground is very wet and swampy.

In the afternoon the solders went out to hunt bears as they had seen their tracks, and they succeeded in killing one with a gunshot. It was measured and found to be fourteen spans from the soles of its feet to its head. The paws were one span long and it must have weighed 375 pounds. We tasted its meat and I though it very savory. Six heathen, who belong to two villages that are nor far from here came to see us.

I gave this lake the name of Lake of the Holy Martyrs, San Juan de Perucia and San Pedro de Sacro Terrato... this place is known to the solders as Camp of Las Vivoras on account of the large number of snakes that were seen; others called it El Oso Flaco (Squibb 1968:9)".

The next day, September 3, the expedition remained at Oso Flaco Lake and sent a small survey party to find a pass through the mountains. These mountains are probably the hills on the north side of San Luis Bay that appear to extend to the end of the ocean at Port San Luis lighthouse. On September 4, 1769 the expedition set out from Oso Flaco Lake at half-past six in the morning:

"We set out to the west over sand dunes, which we crossed in the narrowest part discovered by the explorers, only half a league wide (1.3 miles). We then struck the beach, and travels along it a matter of one league to the northwest; from there we went inland again, turning to the east and crossing the dunes by another narrow place half a league wide.

We were then fortunate enough to travel on solid ground on a tongue between two bodies of water. On the left we had a (body?) of fresh water that was walled in by the dunes and prevented from emptying into the sea; on the left we had an estuary that penetrated into the plain. We rounded it by turning northwest; then we took the road to the north and entered the mountains through a valley grown with live oaks, alders, willows, and other trees, and halted to make camp in the same valley, near an arroyo of running water with watercress. On the whole march, which covered four leagues (10.4 miles), we found one very small town.

Near the camping place, we found a village, whose people immediately came to visit us, bringing their present of fish and seeds, for which we thanked them, the commander reciprocating with some beads. The chief of that village has a large goiter (an enlargement of the thyroid) which hangs from his neck. On account of this, the soldiers named him El Buchon (the goiter), which name he and the village retained. I named the place, San Ladislao, so that this saint may be its patron and protector for its conversion. We observed among these people what we had not seen among any others, namely, that as soon as we arrived the women spread out some mats, and after scattering many seeds on them, told us to be seated. We did so, and these poor creatures remained with us just as though they had always known us (Squibb 1968:10)".

Recent History begins shortly after the Spanish American War in 1898, hermits, drifters, artists, and mystics began moving to the Oceano Dunes. This group of free thinkers, which became known as the Dunites, lived between the dunes in wooden shacks in relative isolation through the 1920s and '30s. After the American entrance into World War II the dunes were closed due to a perceived vulnerability to attack, and many of the Dunites left. The last of the Dunites left in the 1960s. After the war ended, an increase in tourism at Oceano Dunes put an effective end to the secluded Dunite lifestyle. One of the sites at Oceano Dunes appears to date to the Dunite Period.

### B. Current Investigation

A Phase I archaeological survey was conducted in January 2006 by Robert Gibson, Archaeological Consulting, in Paso Robles, California for Condor Environmental Planning Services, Inc. The field survey was directed by Robert Gibson who was assisted by a local Chumash representative, Leilynn Olivas Odom. The survey consisted of an archival records search, an archaeological survey of the ground surfaces of each of the routes, and a confidential written report (Gibson 2006) that is on file with California State Parks and the Central Coast Archaeological Information Center located at the University of California, Santa Barbara. The



**Photo 45:** Chumash Shell Midden at Oceano Dunes SVRA. January 2006. *Photo by Bob Gibson*.

Central Coast Information Center is the official repository and clearinghouse for all archaeological information on San Luis Obispo County.

### Archival Records Search

An archival records search was originally conducted for the 2005 Cultural Resources Inventory (Gruver and Hines 2005) and it included the area of all seven alternative access routes for the current study. The search was conducted with the Central Coast Archaeological Information Center. The archival search yielded information on:

- ➤ Previously surveyed tracts within or near the Area of Potential Effect (APE)
- ➤ Intensity of previous survey efforts
- > Previously recorded properties within or near the APE
- Characteristics of previously recorded properties
- ▶ Dates of previous survey and excavation programs, technical reports and authors.

The records search included the inventories for the State Historic Property Data Files, National Register of Historic Places, National Register of Determined Eligible Properties, California Historical Landmarks, California Points of Historic Interest, California Office of Historic Preservation Archaeological Determinations of Eligibility and the Caltrans State and Local Bridge Surveys.

The archival records search reported in 2005 that within 1/4 mile of the project, a total of 14 archaeological sites had been recorded. As of 2005, no properties in the project area were listed in the National Register of Historic Places, the inventory of California Historical Landmarks or other inventories that were checked.

Previously recorded sites included near the seven alternatives for the current study; SLO-189, SLO-190, SLO-191, SLO-192, SLO-193 and SLO-454 (see Table 2). Other locations of cultural resources that were mapped include an un-recorded site on the north side of Oso Flaco Creek, Nancy's Nook and a possible shell concentration mapped by the NOAA satellite location as #11.

### Methods of Results of Archaeological Surface Survey

The field survey was directed by Robert Gibson with the assistance of local Chumash representative, Leilynn Olivas Odom. The archaeological surface survey consisted of the field personnel ziz-zagging in 10 to 20 meter transects, for an average survey width of 100 to 150 feet for the proposed alternative routes. In many cases, adjacent landforms that appeared to be undisturbed and may contain cultural materials were also examined. In many areas, steep sand dunes, dense riparian areas, and areas that were completely disturbed were not examined. The survey examined the surface of the alternative routes for any signs of prehistoric cultural materials (including seashell fragments, stone tools and fragments, stone flakes, bone, burnt rock, etc.) or significant historic cultural materials (including foundations, square nails, purple glass, trash pits, etc). Each survey area and cultural resource is described below and shown on Figure 7 (not for public review).

A hand held global positioning satellite unit (Garmin, III 1998) was used to mark the location of specific artifacts and general site boundaries. This information was checked with USGS topographic maps as is believed to be fairly accurate. Digital cameras were also used to show the general setting of most archaeological sites. Existing archaeological site records are on file with California State Parks and the Central Coast Archaeological Information Center located at the University of California, Santa Barbara.

### Results of Archeological Surface Survey

Historic and Prehistoric archaeological sites were observed in all of the proposed alternative routes, with the exceptions of the Grand Avenue and Pier Avenue Alternatives. These are described in Gibson (2006) and Gruver and Hines (2005), and illustrated in Figures 7. Both the text and the figures are protected from public review.

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FIGURE 7- Archaeological Sites [Confidential]

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# VI. IMPACT ASSESSMENTS AND MITIGATION MEASURES

### A. Biological Impact Assessment

### **Grand Avenue & Pier Avenue:**

### **Existing Conditions:**

Both Grand Avenue and Pier Avenue are existing access corridors that pass through developed commercial areas to the beach within Ocean Dunes SVRA. Pier Avenue (Photo 1), to the south, is the main entrance for Oceano Dunes SVRA, and has more commercial development than Grand Avenue. From the Pier Avenue access corridor, park visitors drive south along the beach for approximately one half-mile to reach the OHV area. From Grand Avenue, park visitors drive south along the beach for approximately one mile until they reach the Pier Avenue entrance, after which they continue for another half-mile to the OHV area. The beach between Grand Avenue and the OHV area is a day-use area.

In order to get to the OHV area, visitors must drive through the mouth of Arroyo Grande Creek and past areas that are fenced off during the western snowy plover and California least tern nesting seasons.

### Required Infrastructure:

Both Grand Avenue and Pier Avenue are currently being used and do not require additional infrastructure for continued use.

#### *Impacts:*

The principal impact of these access corridors is on the beach and at the mouth of Arroyo Grande Creek. In order to reach the OHV area, visitors must drive through the mouth of the creek. This is often a repeated occurrence as vehicles are driven out and leave the park to shop for groceries and other items. Any organisms living in or migrating through the mouth of the creek therefore are potentially at risk of being struck by vehicles entering or leaving the park. There is a greater chance of vehicles getting stuck in the creek, turning over and releasing petrochemicals at high tides and at periods of high runoff.

The impact of vehicles crossing the creek, between the ocean and Arroyo Grande Creek Lagoon to steelhead, tidewater goby, and other fish species, was evaluated by State Parks fisheries biologist Douglas Rischbieter in 2004. Rischbieter and others have observed that fish typically do not use the reach of creek between the surf line and Arroyo Grande Creek Lagoon for long periods of time; rather it is used as a migration corridor by steelhead and other species for brief migration periods (D. Rischbieter, *pers. comm.* 2006, A. Spina, *pers. comm.* 2006).

Although Rischbieter observed several benthic fish species died during a short-term agency-approved experiment (vehicle driving longitudinally up and down the stream), steelhead and tidewater goby were not injured during the experiment even though they

were present at the time in the lagoon. Rischbieter (2005) speculates that benthic species are more susceptible to being crushed by a vehicle as compared to free swimming species such as steelhead that may be insulated by the high volume of water being displaced by the vehicle.

### **Potentially Impacted Communities:**

**GP-I Bio 1.** Impacts of the existing legal access occurs to the sandy beach and the stream between the lagoon and the tide line.

### **Potentially Impacted Rare Plants:**

**GP-I Bio 1.** Both of these access corridors are already in use, and no new impacts to plant species are expected to occur from their continued use.

### **Potentially Impacted Wildlife:**

#### **GP-I Bio 1.** Steelhead:

Steelhead trout migrate through the creek between the tide line and Arroyo Grande Creek Lagoon in order to reach spawning grounds upstream during winter or early spring when heavy rains have produced high flow in the creek. These high flows are extreme events, and the creek is too deep for vehicles to cross, though some individuals attempt to cross with their vehicles even after being warned of the danger by State Parks officials (Photo 19). However, these flood events are typically short-lived, receding over several days to lower flows. Typically, at this season, visitorship to the park is low. Because steelhead use the stretch of creek between the surf line and Arroyo Grande Creek Lagoon as a migration corridor but not as a spawning area, it is unlikely that vehicles crossing the creek encounter steelhead. Therefore, impacts to this species are unlikely.

### **GP-I Bio 2.** Tidewater goby:

Tidewater gobies are known to pass through the mouth of the creek primarily as planktonic fry. However, this species spends most of its life inhabiting Arroyo Grande Creek Lagoon upstream of the mouth of Arroyo Grande Creek. Therefore, impacts to this species are unlikely.

### GP-I Bio 3. California red-legged frog:

Based on Condor's observations in 2006, Arroyo Grande Creek supports California red-legged frogs. The upper reach of the lagoon that supports overhanging vegetation may support red-legged frogs. Impacts to this species from continued use of Grand and Pier Avenues are unlikely based on the existing location of vehicle crossings.

### GP-I Bio 4. Southwestern pond turtle:

Because the southwestern pond turtle prefers deeper, slow moving, fresh water with overhanging vegetation, it is unlikely that pond turtles would

be present at the mouth of the creek, therefore no impact to this species is expected.

### **GP-I Bio 5.** Two-striped garter snake:

It is unlikely that there will be an impact to two-striped garter snake because it prefers streams and ponds with vegetated banks rather than areas that are bare of vegetation such as the creek mouth. Therefore no impact to this species is expected.

### GP-I Bio 7. Western snowy plover and California least tern:

Continued use of Grand and Pier Avenues is not expected to change the existing level of impact on either western snowy plovers or California least terns.

### Mitigation:

### **Communities:**

**GP-M Bio 1.** No mitigation is required.

### **Rare Plants:**

**GP-M Bio 1.** No mitigation is required.

### Wildlife:

**GP-M Bio 1.** No mitigation is required.

### Residual Impacts:

Continued use of Grand and Pier Avenues to steelhead, tidewater goby, western snowy plover, California least tern, and the other species listed here would not result in a change to the environment.

### **Beach Bridge Options:**

### **Existing Conditions at the Beach:**

These are described in the introduction.

### Required Infrastructure for the Beach Bridge Options:

### Construction and operation of *Beach Bridge Option 1* would include:

- 1. Portable one lane bridge structure with spread footing directly on sand. Total maximum length: 30 feet; total maximum length of span above water: 20 feet. Total maximum height: 24 to 40 inches with 8 to 16 inch clearance. A second one lane bridge could be put in to place parallel to the first bridge.
- 2. This would be dragged into place.
- 3. Heavy equipment would work in the creek and would be required to be dedicated to moving the bridge and preparing the beach twice each day to accommodate the shifting creek and tide. The work of moving the bridge and preparing the beach is expected to take some time and on busy days is expected to result in significant traffic delays and backups on the beach, including the area in front of the residences on Strand Way.
- 4. It would require full-time dedicated staff to oversee and enforce traffic operation at the beach.

### Construction and operation of *Beach Bridge Option 2* would include:

- 1. Driving concrete piles into the sand at the beach until bedrock is reached. A second set of piles could be driven into the sand to accommodate a second one lane bridge parallel to the first bridge.
- 2. Pulling movable bridge sections into place and fastening them to the concrete piles.
- 3. A vehicle would be required to be dedicated to moving the bridge to accommodate the shifting creek.
- 4. It would require full-time dedicated staff to oversee and enforce traffic operation at the beach.

### Impacts:

### **Potentially Impacted Communities:**

BB-I Bio 1. The sandy beach would be impacted by heavy equipment "dressing" the beach ramps, and the stream bed would be impacted by heavy equipment driving and working in the stream. Beach bridge option 2 could change the distribution of sand at the beach. Since the beach already incurs heavy ongoing impacts from vehicles driving on the beach, additional significant impacts to the beach are not expected. The stream however, could be significantly impacted by the heavy equipment working frequently in the stream bed.

### **Potentially Impacted Rare Plants:**

**BB-I Bio 1.** No impacts to plant species are expected to occur.

### **Potentially Impacted Wildlife:**

### BB-I Bio 1. Steelhead:

No impacts to steelhead are expected to occur because Beach Bridge Option 1 would not be in place during the migration period. Beach Bridge Option 2 is unlikely to affect the ability of steelhead to migrate upstream during high flow events.

### BB-I Bio 2. Tidewater goby:

No impacts to tidewater goby are expected to occur, as they typically occur in the lagoon, rather than in the section of stream between the lagoon and the tide line.

### BB-I Bio 3. Benthic Fish and other Benthic Organisms:

Assuming 100 percent use of the bridge, a beneficial impact to benthic and other benthic organisms would occur due to the fact that vehicles would no longer be forced to drive through the bottom of the Arroyo Grande Creek streambed, however, when Arroyo Grande Creek is wider than 30 feet (the length of the bridge), existing impacts are expected to persist.

### Mitigation:

**BB-M Bio 1**. No feasible mitigations have been identified.

### **Residual Impacts:**

The residual impact of the beach bridge alternatives would be significant.

### Creek Road, Ocean Street, and Silver Spur Place:

### **Existing Conditions at Creek Road:**

The Creek Road Alternative is south of the existing access corridors at Grand Avenue and Pier Avenue. It is reached by turning west from Highway 1 onto Railroad Street, crossing the railroad tracks, and then turning left onto Creek Road, an unpaved road that passes alongside an agricultural field next to the north levee of Arroyo Grande Creek, which is also unpaved. This alternative does not currently reach the park.

After reaching the north levee of Arroyo Grande Creek, the alternative would then be on the levee, cross the creek via a new bridge at the Guiton Crossing (Figure 4B) and proceed along the south levee of the creek to the beach. Between the end of the south levee and the beach, the alternative would pass through part of Pismo Dunes Natural Preserve. Once at the beach visitors would travel south along the beach to the OHV area.

### Required Infrastructure at Creek Road:

Development of this alternative would necessitate widening and paving Creek Road, as well as one or both of the two levees of Arroyo Grande Creek. The north levee is currently less than 10 to 27 feet wide, which is not wide enough to support two-way traffic. It would either need to be widened to 28 feet or both the north and south levees would need to be used as one-way roads (each 14 feet wide), one into the park and one out of the park.

Use of this alternative would also require construction of a bridge crossing Arroyo Grande Creek from the north levee to the south levee at the Guiton Crossing (Figure 4B). The bridge would need to be supported by one concrete pier between the levees. Construction of entrance kiosks, restrooms, and other infrastructure would also be required. See project description for further details.

### Existing Conditions at Ocean Street:

The Ocean Street Alternative is reached by turning from Highway 1 on to Railroad Street and then onto Ocean Street. Ocean Street is a paved road that varies considerably in width (8 to 26 feet wide) through an agricultural industrial area. At the southeast end of the Oceano airport, the road turns south toward Arroyo Grande Creek. At the end of the road there is a gate. The gate would be removed and a ramp would be built up to the north levee. The access road would then continue west on the north levee until the Guiton crossing, where a new bridge would be built and vehicles would cross to the south levee. From there, the route is the same as for Creek Road.

#### Required Infrastructure at Ocean Street:

Railroad Street and Ocean Street would need to be widened to 28 feet. The north levee and a portion of the south levee would be paved, and a bridge would be constructed at the Guiton crossing. See project description for further details.

### Existing Conditions at Silver Spur Place:

The Silver Spur Place Alternative is accessed from Highway 1 by turning south onto 22<sup>nd</sup> Street, then right onto Silver Spur Place. From Silver Spur Place, the alternative goes north on an unpaved road between two agricultural fields, then west along the south levee of

Arroyo Grande Creek toward the beach. This alternative does not currently reach the park.

From the south levee of Arroyo Grande Creek the alternative would travel along an equestrian trail (presently closed) that goes on the south levee toward the beach. Between the end of the south levee and the beach, the alternative would pass through a portion of Pismo Dunes Natural Preserve. Once at the beach visitors would travel south along the beach to the OHV area.

### Required Infrastructure at Silver Spur Place:

The south levee is currently 10 to 24 feet wide, which is not wide enough to support twoway traffic. It would either need to be widened to 28 feet or both the north and south levees would need to be used as one-way roads (described above as the Creek Road access corridor).

This alternative would require paving the road up to the south levee as well as the levee itself. The existing equestrian trail would need to be maintained, which will have to be permitted if this alternative is developed. See project description for further details.

### **Impacts:**

### **Potentially Impacted Communities:**

COSS-I Bio 1. These alternatives would significantly impact the following vegetation communities: sand-verbena-beach bursage series, dune lupine-goldenbush series, arroyo willow series, mixed willow series, saltgrass series (lagoon), bur-reed series, open sand, and agricultural lands.

#### **Potentially Impacted Rare Plants:**

### COSS-I Bio 1. Blochman's leafy daisy:

Blochman's leafy daisy (CNPS List 1B) was observed in the vegetated dunes portion within the corridor. Construction of a road, and other infrastructure is expected to remove individuals of this species within the Creek Road corridor.

### COSS-I Bio 2. Blochman's groundsel:

Blochman's groundsel (CNPS List 4) was observed in 2006, but outside the expected area of impact, in vegetated backdunes, however, it is likely to be present in similar habitat inside the impact area. Construction of a road, bridge, and other infrastructure is expected to remove individuals of this species within the Creek Road corridor.

### **Potentially Impacted Wildlife:**

#### COSS-I Bio 1. Steelhead:

Construction of a bridge across Arroyo Grande Creek in winter could impact migrating steelhead by increasing turbidity, substrate disturbance, and temporary implementation of physical barriers to upstream movement. Construction outside of the migration season would be unlikely to have these impacts. In the long term, use of the bridge would be expected to decrease the potential for petrochemical runoff from automobiles because if some vehicles were using the bridge to cross the creek, fewer vehicles would be driven through the creek mouth at the beach. This would be a beneficial impact.

## COSS-I Bio 2. Tidewater goby, California red-legged frog, Southwestern pond turtle and Two-striped garter snake:

Construction of the bridge and widening of the levees could contribute sediment to Arroyo Grande Creek Lagoon and Arroyo Grande Creek that could adversely impact tidewater gobies, red-legged frogs, pond turtles, and (if present) two-striped garter snake. Construction of a road near Arroyo Grande Creek Lagoon as an extension of the south levee could have an indirect impact on these species as a result of dewatering the creek, sediment deposition and increased turbidity during construction. Long-term impacts to these species could include mortality for some individuals due to increased vehicle traffic and petrochemical runoff from automobiles into the creek after construction is complete. Overall, however, the frequency of petrochemical runoff from automobiles in the creek would be expected to decrease as a result of fewer vehicles crossing through the water of the stream. This would be a beneficial impact of the bridge.

### COSS-I Bio 3. Silvery legless lizard and California horned lizard:

Silvery legless lizards and California horned lizard could be impacted by the construction of a road through the Dunes Preserve. Long-term impacts could include habitat removal and mortality of individuals.

### COSS-I Bio 4. Western snowy plover and California least tern:

The road from the Dunes Preserve to the beach could result in mortality of Western snowy plover and California least tern due to conflicts with vehicle traffic. The number of nests at the Dunes Preserve typically represents less than two percent of the total nests at the park (R. Glick pers. comm. 2006).

### COSS-I Bio 5. Southwestern willow flycatcher and yellow warbler:

If southwestern willow flycatcher, or yellow warbler is nesting in the lower stretch of Arroyo Grande Creek at the time of bridge construction, these species could be significantly impacted if construction occurs close to a nest.

### COSS-I Bio 6. Loggerhead shrike:

Loggerhead shrikes could be impacted due to the loss of a portion of the agricultural field and the dune scrub near the western end of the Alternatives. If this species is nesting close to this Alternative, it could be significantly impacted by construction.

### Mitigation:

### **Communities:**

COSS-M Bio 1. Habitat restoration should occur at a 3:1 ratio (acres restored to acres impacted) for each type of community that is significantly impacted with the exception of agricultural land. Possible restoration actions could include: 1) elimination of agricultural production on land currently owned by California State Parks near Oso Flaco Lake and restoration of wetland habitat, 2) exclusion of OHV riding in portions of the dunes within the SVRA and allow habitat restoration to occur, and 3) concentrated efforts to remove European beach grass and purple veldt grass and restore the native dune communities in the Pismo Dunes Preserve, on ConocoPhillips land leased to California State Parks, and near Oso Flaco Lake.

### **Rare Plants:**

COSS-M Bio 1. Surveys for Blochman's leafy daisy and all CNPS List 1B species should be conducted prior to construction by an approved botanist. Individuals should be marked with pin flags and should be avoided. If necessary, the corridor should be re-routed to ensure that these individuals are not removed.

Blochman's groundsel (CNPS List 4) would not require complete avoidance. Surveys should be conducted prior to construction by an approved botanist; individuals should be identified and boundaries flagged. These areas should be avoided when feasible during construction. If the areas cannot be avoided restoration plans should be devised and implemented upon completion of short-term construction and monitored throughout long-term operation.

Financial incentives should be made available to crew workers who display discretionary avoidance or make an effort to minimize disturbance of sensitive species.

## Wildlife:

COSS-M Bio 1. Morro Boisduval's Blue: Impacts to dune scrub dominated by dune lupine should be minimized.

#### COSS-M Bio 2. Steelhead:

Avoid construction of the bridge across Arroyo Grande Creek between November 1 and May 1.

# COSS-M Bio 3. Tidewater goby:

Measures such as silt fencing, dewatering and other techniques, should be used during paving and widening of the levees and bridge construction to minimize deposition of sediment into Arroyo Grande Creek Lagoon.

# COSS-M Bio 4. California red-legged frog, Southwestern pond turtle, Two-striped garter snake, southwestern willow flycatcher, yellow warbler:

Construction should occur outside of the nesting season. Preconstruction surveys for nesting birds should be conducted by an approved biologist for four consecutive weeks prior to construction. If nests are found or breeding is otherwise observed, construction should be postponed until the young of the year have fledged. Immediately prior to construction, the construction area should be surveyed by an approved biologist and fenced using silt fencing backed up by orange plastic construction fencing. Vegetation should be removed by hand and closely monitored by a qualified biologist. The cleared area should be surveyed at night to capture and relocate any animals within the fenced construction zone. This should be done again within 24 hours of construction. The biological monitor should check the construction area and clear it of all animals prior to construction activities.

Creek flow should be directed into a culvert(s) through the construction zone. This culvert can be covered to create an access road during construction. Following construction of the bridge, the road material should be removed, the creek corridor recontoured, and finally the culvert can be removed. The biological monitor should be onsite monitoring the construction activity.

# COSS-M Bio 5. Silvery legless lizard, California Horned Lizard, and Loggerhead Shrike:

An approved biologist should conduct pre-construction surveys for Silvery legless lizard, California Horned Lizard, and Loggerhead Shrike (nests), and monitor construction in the Dunes Preserve. Any legless lizards and California horned lizards should be relocated to a safe area. Construction should utilize vegetation removal techniques such as "backdragging" to minimize the number of legless lizards and horned lizards killed by construction.

# COSS-M Bio 6. Western snowy plover and California least tern:

The road from the Dunes Preserve to the beach should be designed so that it does not pass through known nesting areas.

# COSS-M Bio 7. Habitat:

Riparian forest and dune scrub that provide habitat for these species could be purchased, protected, and restored by California State Parks.

# Residual Impacts:

The residual impact of these alternatives after the mitigation measures have been implemented may still be significant.

# **ConocoPhillips:**

## **Existing Conditions:**

The ConocoPhillips Alternative begins approximately ¼ mile south of Callender Road at the entrance to the ConocoPhillips refinery on Highway 1. The road is paved from the highway to the railroad tracks. After crossing the tracks, the road passes through private, mostly undeveloped land owned by ConocoPhillips and leased to California State Parks (Figures 3 and 4D), using an unpaved road that crosses vegetated dunes, and passes near two of the dune lakes: Jack Lake and Lettuce Lake. The unpaved road presently terminates at a locked gate at the transition from vegetated to unvegetated dunes.

# Required Infrastructure:

This alternative would require construction of a paved road roughly 2.5 miles in length, extending from the railroad tracks through stabilized dune vegetation and unvegetated dunes to the beach, as well as entrance kiosks, restrooms, and other infrastructure related to a new park entrance. See project description for further details.

# Impacts:

# **Potentially Impacted Communities:**

**CP-I Bio 1.** This alternative would remove sand-verbena-beach bursage series, dune lupine-goldenbush series, arroyo willow series, and bulrush-cattail series.

## **Potentially Impacted Rare Plants:**

## CP-I Bio 1. Nuttall's locoweed:

Nuttall's locoweed (CNPS List 4) was observed in 2003 on a vegetated dune near "Pipeline" in the riding area (Figure 5). Individuals of this species could be removed as a result of construction and long-term operation of this alternative.

# CP-I Bio 2. Dune larkspur:

Dune larkspur (CNPS List 1B) was observed in 2006 in the ConocoPhillips alternative access corridor (Figure 5). Construction of a road and other infrastructure is expected to remove individuals of this species.

# CP-I Bio 3. Dune wallflower:

Dune wallflower (CNPS List 4) was observed in several locations within the ConocoPhillips corridor (Figure 5). Construction of a road and other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor.

## CP-I Bio 4. Blochman's leafy daisy:

Blochman's leafy daisy (CNPS List 1B) species and was observed in 2003 and 2005 (Figure 5). This species is a widespread herbaceous species and construction of a road and other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor.

## CP-I Bio 5. Fuzzy prickly phlox:

Fuzzy prickly phlox (CNPS List 4) was observed in several locations in 2003 along the corridor near the end of the existing road (Figure 5). Construction of a road and other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor.

# CP-I Bio 6. Nipomo Mesa lupine:

Nipomo Mesa lupine (FE/CE/1B) was observed in 2006 in several locations in this corridor; often occurring in or on the margins of the existing road. Construction of a road and other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor.

# CP-I Bio 7. Crisp monardella:

Crisp monardella (CNPS List 1B) was frequently observed in 2003 and 2005 (Figure 5) along the corridor. Construction of a road and other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor.

### CP-I Bio 8. San Luis Obispo monardella:

San Luis Obispo monardella (CNPS List 4) was observed in 2005 in the corridor, often co-occurring with crisp monardella. Construction of a road and other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor.

### CP-I Bio 9. California spineflower:

California spineflower (CNPS List 4) was observed in 2003 and 2005 along the corridor; abundant in the dunes and with less frequency approaching the beach (Figure 5). Construction of a road and other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor.

#### CP-I Bio 10. Sand almond:

Sand almond (CNPS List 4) was observed in 2005 in three locations between the railroad crossing and Jack Lake along the alternative access corridor. Construction of a road and other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor

## CP-I Bio 11. Blochman's groundsel:

Blochman's groundsel (CNPS List 4) was commonly observed in 2005 in several locations along the corridor (Figure 5). Construction of a road and

other infrastructure is expected to remove individuals of this species within the ConocoPhillips corridor.

# **Potentially Impacted Wildlife:**

#### CP-I Bio 1. Morro Boisduval's Blue:

Morro Boisduval's Blue was observed in six locations within the ConocoPhillips corridor in 2006 and would experience habitat loss as a result of this alternative.

# CP-I Bio 2. California red-legged frog and Southwestern pond turtle:

California red-legged frogs and southwestern pond turtles were observed in Jack Lake in 2006. Lettuce Lake may also provide suitable habitat in some years depending on rainfall. Development near these lakes could remove upland habitat used by these animals. Long term impacts to these species could include mortality for some individuals due to increased vehicle traffic and petrochemical runoff from automobiles into the lakes after construction is complete, and disturbance at night from vehicle lights.

# **CP-I Bio 3.** Two-striped garter snake:

Jack Lake and possibly Lettuce Lake provide suitable habitat for twostriped garter snakes, although this species was not observed. Development near these lakes could remove upland habitat and could result in other impacts to the species including sedimentation and pollutants in the lakes, and disturbance at night from vehicle lights.

### **CP-I** Bio 4. Silvery legless lizard and California horned lizard:

Silvery legless lizard was observed in four locations within this corridor and California horned lizard was observed within 300 feet of the corridor. Construction of this alternative would remove legless lizard and California horned lizard habitat and may result in mortality as a result of construction and ongoing vehicle traffic on the road. Development of a road and increased human presence could facilitate invasion of non-native Argentine ants which could have a significant impact on native ant populations and therefore California horned lizard.

# CP-I Bio 5. Western snowy plover and California least tern:

Since this alternative would go through the middle of the nesting area for both the western snowy plover and California least tern, both species would experience loss of habitat, and increased mortality.

# CP-I Bio 6. Southwestern willow flycatcher and yellow warbler:

Willow flycatcher could occur at Jack Lake and Lettuce Lake and could be impacted by vehicle noise and lights at night. Yellow warbler was observed at Jack Lake and could also be impacted by vehicle noise and light.

## CP-I Bio 7. Loggerhead shrike:

Loggerhead shrike was observed within this alternative which passes through open areas that are well suited as habitat for this species. Construction along this alternative would likely lead to removal of habitat for loggerhead shrike that could adversely impact this species.

## CP-I Bio 8. American Badger:

The entire length of this alternative passes through dry dunes that constitute suitable habitat for American badger. Long term use of the road may result in mortality as a result of ongoing vehicle traffic on the road.

# Mitigation:

CP-M Bio 1.

Habitat restoration should occur at a 3:1 ratio (acres restored to acres impacted) for each type of community that is significantly impacted with the exception of agricultural land. Possible restoration actions could include (but should not be limited to): 1) elimination of agricultural production on land currently owned by California State Parks near Oso Flaco Lake and restoration of wetland habitat, 2) exclusion of OHV riding in portions of the dunes within the SVRA and allow habitat restoration to occur, and 3) concentrated efforts to remove European beach grass and purple veldt grass and restore the native dune communities: 1) in the Pismo Dunes Preserve, 2) on ConocoPhillips land leased to California State Parks, and 3) near Oso Flaco Lake.

## **Rare Plants:**

CP-M Bio 1. Dune larkspur, Blochman's leafy daisy, Nipomo Mesa lupine, crisp monardella, San Luis Obispo monardella are CNPS List 1B species. Surveys should be conducted prior to construction by an approved botanist. Individuals should be marked with pin flags and should be avoided. The corridor should be re-routed to ensure that these individuals

CP-M Bio 2 Nuttall's locoweed, dune wallflower, fuzzy prickly phlox, California spineflower, sand almond, and Blochman's groundsel are CNPS List 4 species and would not require complete avoidance. However, surveys should be conducted prior to construction by an approved biologist and areas that exhibit high densities of these species should be identified and boundaries flagged. These areas should be avoided when feasible during construction. If the areas cannot be avoided restoration plans should be devised and implemented upon completion of short-term construction and monitored throughout long-term operation.

are not removed.

Financial incentives should be made available to crew workers who display discretionary avoidance or make an effort to minimize disturbance of sensitive species.

## Wildlife:

#### CP-M Bio 1. Morro Boisduval's Blue:

Impacts to dune lupine habitat should be minimized.

# CP-M Bio 2. California red-legged frog, Southwestern pond turtle, and Two-striped garter snake:

Silt and barrier fencing should be constructed parallel to the ConocoPhillips Road at the top of the hill before it begins to slope down to Jack Lake and Lettuce Lake. The objectives of the fencing would include keeping sediment and other contaminants from entering the lake and preventing the animals from entering the construction zone.

## CP-M Bio 3. California Horned Lizard and Silvery legless lizard:

An approved biologist should conduct pre-construction surveys for Silvery legless lizard, California Horned Lizard, and Loggerhead Shrike (nests), and monitor construction in the Dunes Preserve. Any legless lizards and California horned lizards should be relocated to a safe area. Construction should utilize vegetation removal techniques such as "backdragging" to minimize the number of legless lizards and horned lizards killed by construction.

# CP-M Bio 4. Western snowy plover and California least tern:

Two alternative routes should be considered. One alternative route is to terminate the east-west portion of the ConocoPhillips corridor in the dunes east of the beach, and direct it north along the easterly edge of the western snowy plover and California least tern area in order to minimize impacts to these species. The second alternative for consideration should be closing a part of the beach that is currently open to vehicles so that portion of the beach could be used for nesting by these two species.

# CP-M Bio 5. Southwestern willow flycatcher, yellow warbler, and other sensitive bird species potentially nesting in or near the corridor:

Construction should occur outside of the nesting season. Preconstruction surveys for nesting birds should be conducted at Jack Lake and Lettuce Lake by an approved biologist for four consecutive weeks prior to construction. If nests are found or breeding is otherwise observed, construction within 500 feet of the nests should be postponed until the young of the year have fledged.

The residual impacts to Dune larkspur, Blochman's leafy daisy, Nipomo Mesa lupine, crisp monardella, San Luis Obispo monardella would not be significant as long as individuals of these species and their habitat is avoided.

The residual impacts to Nuttall's locoweed, dune wallflower, fuzzy prickly phlox, California spineflower, sand almond, and Blochman's groundsel may be mitigated to a less than significant level depending on the extent of avoidance and impact and the success of the mitigation.

The residual impact of the ConocoPhillips Alternative to California red-legged frog, southwestern pond turtle, California horned lizard, silvery legless lizard, and possibly Morro Boisduval's blue, western snowy plover and California least tern would be significant, even with implementation of the mitigation measures.

# Oso Flaco Lake:

## **Existing Conditions:**

The Oso Flaco Lake Road alternative is reached by turning west onto Oso Flaco Lake Road from Highway 1. From Highway 1, Oso Flaco Lake Road passes through agricultural fields until it reaches the parking area for Oso Flaco Lake, managed by California State Parks. After reaching the parking area a dirt road that is currently closed to vehicular traffic continues past Oso Flaco Lake (Photo 33) and through a vegetated wetland area to the dunes. A portion of this dirt road is built over culverts allowing water to flow under the road to Oso Flaco Lake (Photo 46). In the dunes area an unpaved trail passes through stabilized dunes towards the beach.



**Photo 46:** Oso Flaco Lake next to access road. August 2005. *Photo by Elihu Gevirtz*.

Once at the beach, visitors would have to travel north on the beach to the riding area.

# Required Infrastructure:

This alternative would require opening the road past the Oso Flaco Lake parking area to vehicular traffic. The road past Oso Flaco Lake is currently 8 to 17 feet wide, and would need to be widened to 28 feet. After Oso Flaco Lake, a paved road would need to be constructed through the dunes, and entrance kiosks, restrooms, and other infrastructure related to a new park entrance would need to be constructed. Widening of Oso Flaco Lake Road between Highway 1 and Oso Flaco Lake would also be required. See project description for further details.

#### Impacts:

# **Potentially Impacted Communities:**

This alternative would significantly impact the following communities: sand verbenabeach bursage series, dune lupine-goldenbush series, arroyo willow series, saltgrass series, bulrush-cattail series, cattail series, bur-reed series, agricultural lands, and open sand.

## **Potentially Impacted Rare Plants:**

### OF-I Bio 1. Sticky sand-verbena:

Sticky sand-verbena (or red sand-verbena) (CNPS List 4) was observed in several locations in the vegetated dunes in the Oso Flaco corridor and near the shoreline in 2003 and also observed in 2005. The proposed alternative could remove individuals of this species.

#### OF-I Bio 2. Nuttall's locoweed:

Nuttall's locoweed (CNPS List 4) was observed in 2003 and Condor in 2005 between Oso Flaco Lake and the vegetated backdunes. The individual observed occurs just outside the alternative access alternative expected impact area, however, the proposed alternative could potentially remove

individuals of this species that were not observed in similar habitats within the impact zone.

# OF-I Bio 3. Beach spectacle pod:

Beach spectacle pod (CNPS List 1B) was observed in 2003 between the foreshore and backshore of the beach northwest of Oso Flaco Lake and the foremost dunes. The proposed alternative is expected to remove individuals of this species.

## OF-I Bio 4. Blochman's leafy daisy:

Blochman's leafy daisy (CNPS List 1B) was observed in several locations in 2003 and by Condor in 2005 (Figure 5). The proposed alternative is expected to remove individuals of this species.

# OF-I Bio 5. Dune wallflower (or suffrutescent wallflower):

Dune wallflower (CNPS List 4) was observed in vegetated dunes of the Oso Flaco corridor in 2005 (Figure 5). The proposed alternative is expected to remove individuals of this species.

#### OF-I Bio 6. Dunedelion:

Dunedelion (CNPS List 4) was observed in 2003 and Condor in 2005 within or near the proposed alternative access corridor. The proposed alternative access alternative is expected to remove individuals in the Oso Flaco Lake area and between the foreshore and backshore of the beach.

#### OF-I Bio 7. Crisp monardella:

Crisp monardella (CNPS List 1B) was frequently observed in coastal dunes along the corridor in 2003 and by Condor in 2005 (Figure 5). The proposed alternative is expected to remove individuals of this species.

## OF-I Bio 8. Blochman's groundsel:

Blochman's groundsel (CNPS List 4) was observed in 2005 in numerous locations along the corridor (Figure 5). Construction of a road and other infrastructure is expected to remove individuals of this species.

## OF-I Bio 9. Gambel's watercress:

Gambel's watercress (CNPS List 1B) was observed in 1998 and 2003. This species has been documented in three locations; all occurring on or near the margins of Oso Flaco Lake northwest of the agricultural fields in close proximity to the existing access road. The proposed alternative access alternative could potentially remove this species and/or lead to some loss of habitat for this species.

# **Potentially Impacted Wildlife:**

#### OF-I Bio 1. Morro Boisduval's Blue:

Morro Boisduval's Blue would experience habitat loss as a result of this alternative.

## OF-I Bio 2. Steelhead and Tidewater goby:

Steelhead and tidewater goby are not present in Oso Flaco Creek and are not expected to be impacted.

# OF-I Bio 3. California red-legged frog:

Surveys conducted as recent as 2002 indicate that California red-legged frogs are present in Oso Flaco Creek, and may be present in Oso Flaco Lake as well, although this species was not observed in the Lake in 2006. If present, widening of the road and possible mortality of individuals through this area could lead to the loss of wetland and possible upland habitat for this species.

# OF-I Bio 4. Southwestern pond turtle:

The still water and overhanging vegetation at Oso Flaco Lake constitutes suitable habitat for southwestern pond turtles. Construction of an access alternative through this area would lead to the loss of habitat for this species and possible mortality of individuals.

## OF-I Bio 5. Two-striped garter snake:

The area that is currently closed to vehicular traffic contains vegetated wetland that is suitable habitat for two striped garter snake. Continued use of this alternative could also lead to an increased number of disturbances and the possibility of mortality through encounters between garter snakes and vehicles, especially where the road passes over the culvert at the water's edge.

# OF-I Bio 6. Silvery legless lizard and California horned lizard:

The final 2,500 feet section of this corridor, from Oso Flaco Lake boundary to the beach, passes through dunes that are suitable habitat for silvery legless lizard and California horned lizard. Construction of a road through the dunes would destroy habitat and could result in the mortality of individuals of these species.

# OF-I Bio 7. Western snowy plover and California least tern:

Two alternative routes should be considered. One alternative route is to terminate the east-west portion of the ConocoPhillips corridor in the dunes east of the beach, and direct it north along the easterly edge of the western snowy plover and California least tern area in order to minimize impacts to these species. The second alternative for consideration should be closing a part of the beach that is currently open to vehicles so that portion of the beach could be used for nesting by these two species.

# OF-I Bio 8. Southwestern willow flycatcher and yellow warbler:

The willow forest around Oso Flaco Lake supports yellow warbler and may support Southwestern willow flycatcher. Construction noise in the breeding season could significantly impact these species. Widening of the road in this area would permanently reduce the amount of habitat available to these species.

# OF-I Bio 9. Loggerhead shrike:

The Oso Flaco Lake Road access alternative may have an adverse but less than significant impact on loggerhead shrike given widening of Oso Flaco Lake Road between Highway 1 and Oso Flaco Lake and removal of dune scrub habitat between the lake and the beach.

# Mitigation:

# **Communities:**

OF-M Bio 1. Habitat restoration should occur at a 3:1 ratio (acres restored to acres impacted) for each type of community that is significantly impacted with the exception of agricultural land. Possible restoration actions could include (but should not be limited to): 1) elimination of agricultural production on land currently owned by California State Parks near Oso Flaco Lake and restoration of wetland habitat, 2) exclusion of OHV riding in portions of the dunes within the SVRA and allow habitat restoration to occur, and 3) concentrated efforts to remove European beach grass and purple veldt grass and restore the native dune communities in the Pismo Dunes Preserve, on ConocoPhillips land leased to California State Parks, and near Oso Flaco Lake.

### **Rare Plants:**

- **OF-M Bio 1. Beach spectacle pod, Blochman's leafy daisy, Crisp monardella,** and **Gambel's watercress** are CNPS List 1B species. Surveys should be conducted prior to construction by an approved biologist. Individuals should be marked with pin flags and should be avoided. The corridor should be re-routed to ensure that these individuals are not removed.
- OF-M Bio 2. Sticky sand-verbena, Nuttall's locoweed, dune wallflower, dunedelion, and Blochman's groundsel are CNPS 4 species and would not require complete avoidance, however, surveys should be conducted prior to construction by an approved biologist and areas that exhibit high densities of these species should be identified and boundaries flagged. These areas should be avoided when feasible during construction If the areas cannot be avoided, restoration plans should be devised and implemented upon completion of short-term construction and monitored throughout long-term operation.

Financial incentives should be made available to crew workers who display discretionary avoidance or make an effort to minimize disturbance of these species.

## Wildlife:

#### OF-M Bio 1. Morro Boisduval's Blue:

Impacts to dune lupine habitat should be minimized.

# OF-M Bio 2. California red-legged frog, Southwestern pond turtle, and Two-striped garter snake:

Construction should occur outside of the breeding season. The construction area should be surveyed by an approved biologist and fenced using silt fencing backed up by orange plastic construction fencing. Vegetation should be removed by hand and closely monitored by a qualified biologist. The cleared area should be surveyed at night to capture and relocate any animals within the fenced construction zone. This should be done again within 24 hours of construction. The biological monitor should check the construction area and clear it of all animals prior to construction activities. The biological monitor should be onsite monitoring the construction activity.

# OF-M Bio 3. California Horned Lizard and Silvery legless lizard:

An approved biologist should conduct pre-construction surveys for Silvery legless lizard, California Horned Lizard, and Loggerhead Shrike (nests), and monitor construction in the dune scrub between the lake and the beach. Any legless lizards and California horned lizards should be relocated to a safe area. Construction should utilize vegetation removal techniques such as "backdragging" to minimize the number of legless lizards and horned lizards killed by construction.

### OF-M Bio 4. Western snowy plover and California least tern:

Impacts to the western snowy plover and California least tern along the beach would be unavoidable. Nest exclosures could be shifted to the stretch of beach between Pier Ave and a designated point south. Other mitigation measures and management tools discussed previously could also be used but would not reduce the significance of the impact.

### OF-M Bio 6. Southwestern willow flycatcher and yellow warbler:

Construction should be scheduled outside of the nesting season. Preconstruction surveys should be conducted during four consecutive weeks to ascertain the presence of yellow warbler, southwestern willow flycatchers, and other sensitive species at Oso Flaco Lake. If nesting or other evidence of breeding of sensitive species is observed, construction should be postponed until after the breeding season.

# OF-M Bio 7. Loggerhead shrike:

None required.

# Residual Impacts:

Residual impacts to Beach spectacle pod, Blochman's leafy daisy, Crisp monardella, and Gambel's watercress would not be significant if avoidance is successful. The residual impacts to sticky sand-verbena, Nuttall's locoweed, dune wallflower, dunedelion, and Blochman's groundsel may be significant depending upon the extent of impact and the success of mitigation.

The residual impact of the Oso Flaco Lake Alternative to California red-legged frog, southwestern pond turtle, California horned lizard, silvery legless lizard, and possibly Morro Boisduval's blue, western snowy plover and California least tern and other wildlife species would be significant, even with implementation of the mitigation measures.

# **Little Oso Flaco Lake:**

# **Existing Conditions:**

The Little Oso Flaco Lake Alternative is reached by turning west onto Oso Flaco Lake Road from Highway 1. Between Highway 1 and the turnoff to Little Oso Flaco Lake, Oso Flaco Lake Road passes through agricultural fields. From Oso Flaco Lake Road, the alternative turns north, before the parking area for Oso Flaco Lake, passes between two fields, and crosses Little Oso Flaco Lake using an existing dirt road over a culvert. On the north side of Little Oso Flaco Lake the alternative would be constructed through an agricultural field before intersecting the ConocoPhillips Alternative and turning west, passing through stabilized and unstabilized dunes to the beach.

# Required Infrastructure:

Construction of this alternative would require possibly widening Oso Flaco Lake Road, widening the roads through the agricultural fields on both sides of Little Oso Flaco Lake, widening the road across the lake, installing one or more culverts, and constructing a road through the dunes from the agricultural field to the ConocoPhillips Alternative. Entrance kiosks, restrooms, and other infrastructure relating to a new park entrance would also be required. See project description for further details.

### **Impacts:**

# **Potentially Impacted Communities:**

**LOF-I Bio 1.** This alternative would significantly impact sand-verbena-beach bursage series, dune lupine-goldenbush series, arroyo willow series, bulrush-cattail series, open sand, and agricultural lands.

### **Potentially Impacted Rare Plants:**

- LOF-I Bio 1. Plant species that could be potentially impacted by this access alternative are similar to the ConocoPhillips alternative, due to the fact that this corridor intersects with the ConocoPhillips alternative, passing through stabilized and unstabilized dunes to the beach. The following taxa have been described previously, in detail, in the ConocoPhillips impact analysis: Blochman's leafy daisy, Crisp monardella (CNPS List 1B species), Nuttall's locoweed, dune wallflower, fuzzy prickly phlox, dunedelion, San Luis Obispo monardella, California Spineflower, and Blochman's groundsel (CNPS List 4 species).
- LOF-I Bio 2. Gambel's watercress (FE/CE/1B) is the only species not previously described in the ConocoPhillips impact analysis. It was observed in 1998 and 2003 on the northern margin of Little Oso Flaco Lake, adjacent to an agricultural field. The species does not occur within the expected area of impact along the Little Oso Flaco alternative access corridor, however, it is mentioned here due to its special status and potential to occur in similar habitat near the Little Oso Flaco corridor.

# **Potentially Impacted Wildlife:**

#### LOF-I Bio 1. Morro Boisduval's Blue:

Morro Boisduval's Blue would experience habitat loss as a result of construction of this alternative.

# LOF-I Bio 2. Steelhead and Tidewater goby:

Steelhead and tidewater goby are not present in Little Oso Flaco Lake and would not be impacted by this alternative.

# LOF-I Bio 3. California red-legged frog, Southwestern pond turtle, and Two-striped garter snake:

The still water and overhanging vegetation at Little Oso Flaco Lake constitutes suitable habitat for California red-legged frog, southwestern pond turtle, and two-striped garter snake. These animals have not been observed in Little Oso Flaco Lake; however, red-legged frog and pond turtle were observed immediately upstream. Construction of an access alternative through this area could result in loss of habitat for these species.

# LOF-I Bio 4. Silvery legless lizard and California horned lizard:

Silvery legless lizard and California horned lizard could be impacted where this alternative passes through the dunes between the agricultural field and the beach. Construction of a road through the dunes would lead to loss of habitat for these species, and possible mortality of individuals.

# LOF-I Bio 5. Western snowy plover and California least tern:

Development of this alternative would result in drivers driving vehicles through the nesting area of western snowy plover and California least tern and could result in mortality of individuals of these species.

# LOF-I Bio 6. Southwestern willow flycatcher, yellow warbler, California Swainson's thrush:

This alternative does not contain suitable habitat for the Southwestern Willow Flycatcher, and is not expected to have an impact on this species. However, yellow warbler and California Swainson's thrush were observed at Little Oso Flaco Lake. Construction and long-term operation could adversely affect breeding of yellow warbler and disturbance to California Swainson's thrush.

### LOF-I Bio 7. Loggerhead shrike:

The Oso Flaco Lake Road access alternative would have an adverse impact on loggerhead shrike given widening of Oso Flaco Lake Road between Highway 1 and Oso Flaco Lake and removal of dune scrub habitat between the lake and the beach.

# Mitigation:

## **Communities:**

LOF-M Bio 1. Habitat restoration should occur at a 3:1 ratio (acres restored to acres impacted) for each type of community that is significantly impacted with the exception of agricultural land. Possible restoration actions could include: 1) elimination of agricultural production on land currently owned by California State Parks near Oso Flaco Lake and restoration of wetland habitat, 2) exclusion of OHV riding in portions of the dunes within the SVRA and allow habitat restoration to occur, and 3) concentrated efforts to remove European beach grass and purple veldt grass and restore the native dune communities in the Pismo Dunes Preserve, on ConocoPhillips land leased to California State Parks, and near Oso Flaco Lake.

### Rare Plants:

LOF-M Bio 1. Surveys should be conducted prior to construction by an approved botanist for marsh sandwort, Blochman's leafy daisy, Crisp monardella (CNPS List 1B), and Gambel's watercress (FE/CE/CNPS List 1B). Individuals should be marked with pin flags and should be avoided. The corridor may be re-routed to ensure that these individuals are not removed.

LOF-M Bio 2. Nuttall's locoweed, dune wallflower, dunedelion, Blochman's groundsel (CNPS List 4) would not require complete avoidance, however, surveys should be conducted prior to construction by an approved biologist. Areas that exhibit high densities of these species should be identified, boundaries flagged, and avoided when feasible during construction. If the areas cannot be avoided restoration plans should be devised and implemented upon completion of short-term construction and monitored throughout long-term operation.

Financial incentives should be made available to crew workers who display discretionary avoidance or make an effort to minimize disturbance of these species.

#### Wildlife:

#### LOF-M Bio 1. Morro Boisduval's Blue:

Impacts to dune lupine should be minimized.

#### LOF-M Bio 2. Steelhead:

Because there are no expected impact to steelhead or tidewater goby, no mitigation measures are necessary.

# LOF-M Bio 3. California red-legged frog, Southwestern pond turtle, and Two-striped garter snake:

Construction should occur outside of the breeding season. The construction area should be surveyed by an approved biologist and fenced using silt fencing backed up by orange plastic construction fencing. Vegetation should be removed by hand and closely monitored by a qualified biologist. The cleared area should be surveyed at night to capture and relocate any animals within the fenced construction zone. This should be done again within 24 hours of construction. The biological monitor should check the construction area and clear it of all animals prior to construction activities. The biological monitor should be onsite monitoring the construction activity. Silt and barrier fencing should be constructed a minimum of 100 feet from the unnamed wetland west of the proposed road and Lettuce Lake. The objectives of the fencing would include keeping sediment and other contaminants from entering the lake and preventing the animals from entering the construction zone.

# LOF-M Bio 4. Silvery legless lizard and California horned lizard:

An approved biologist should conduct pre-construction surveys for silvery legless lizard, California horned lizard, and loggerhead shrike (nests), and monitor construction in the dune scrub between the lake and the beach. Any legless lizards and California horned lizards should be relocated to a safe area. Construction should utilize vegetation removal techniques such as "backdragging" to minimize the number of legless lizards and horned lizards killed by construction.

# LOF-M Bio 5. Western snowy plover and California least tern:

Impacts to western snowy plover and California least tern along the beach would be unavoidable. Nest exclosures could be shifted to the stretch of beach between Pier Ave and a designated point south. Other mitigation measures and management tools discussed previously could also be used but would not reduce the significance of the impact to a less than significant level.

#### LOF-M Bio 6. Yellow warbler:

Construction should be scheduled outside of the nesting season. Preconstruction surveys should be conducted during four consecutive weeks to ascertain the presence of yellow warbler, southwestern willow flycatchers, and other sensitive species at Little Oso Flaco Lake. If nesting or other evidence of breeding of sensitive species is observed, construction should be postponed until after the breeding season.

### LOF-M Bio 7. Loggerhead shrike:

None required.

Residual impacts to Beach spectacle pod, Blochman's leafy daisy, Crisp monardella, and Gambel's watercress would not be significant if avoidance is successful. The residual impacts to sticky sand-verbena, Nuttall's locoweed, dune wallflower, dunedelion, and Blochman's groundsel may be significant depending upon the extent of impact and the success of mitigation.

The residual impact of the Oso Flaco Lake Alternative to California red-legged frog, southwestern pond turtle, California horned lizard, silvery legless lizard, and possibly Morro Boisduval's blue, western snowy plover and California least tern and other wildlife species would be significant, even with implementation of the mitigation measures.

# **Biological Impacts Summary:**

**Grand Avenue and Pier Avenue** are currently in use and their continued use is not expected to cause any additional impact beyond the existing impacts to sensitive plant and animal species. No additional impacts are expected.

**Beach Bridge Options 1 and 2** would provide a beneficial impact to benthic fish and other organisms living in the segment of Arroyo Grande Creek between the lagoon and the ocean tide line during the part of the year when there are low flows and a stream width not greater than 30 feet.

The Creek Road, Ocean Street, and Silver Spur Place Alternatives would significantly impact the following vegetation communities: sand-verbena-beach bursage series, dune lupine-goldenbush series, arroyo willow series, mixed willow series, saltgrass series (lagoon), bur-reed series, open sand, and agricultural lands. Widening of one or both levees would result in the removal or disturbance of Blochman's leafy daisy and Blochman's groundsel.

Short-term impacts would include the effects of noise from construction equipment on birds in the riparian habitat of Arroyo Grande Creek, the scrub habitat of the back dunes, and the lagoon environment. If occurring during nesting season, disruption of nesting of several sensitive species such as yellow warbler could result in abandonment of some nests, which, depending on the species, could be a significant impact.



**Photo 47:** Impacts inside the OHV riding area on dune vegetation. November 2005. *Photo by Jennifer Jackson.* 

These alternatives may also significantly impact the following sensitive animal species: steelhead,

California red-legged frog, tidewater goby, southwestern pond turtle, silvery legless lizard, California horned lizard, western snowy plover, California least tern and American badger.

Implementation of the mitigation measures would reduce the significance of the impacts but would not decrease them to a less than significant level.

The ConocoPhillips Alternative would remove sand-verbena-beach bursage series, dune lupine-goldenbush series, arroyo willow series, and bulrush-cattail series. Construction and prolonged use of this corridor would remove habitat for Nuttall's locoweed, dune larkspur, dune wallflower, Blochman's leafy daisy, fuzzy prickly phlox, Nipomo Mesa lupine, crisp monardella, San Luis Obispo monardella, California spineflower, sand almond, and Blochman's groundsel.

The ConocoPhillips Alternative would increase the park's impact on species utilizing the sandy beach including California least tern and western snowy plover. Additional sensitive animal species that would be significantly impacted include: Morro Boisduval's

Blue, silvery legless lizard, California horned lizard, loggerhead shrike, possibly burrowing owl, and American badger. This alternative would have no impact on aquatic wildlife species since it does not intersect with riparian or fresh water marsh habitat. However, it does have the potential to impact wetland dependent animal species that utilize upland habitat, such as California red-legged frog and southwestern pond turtle, since it is within 300 feet of Jack Lake.

Implementation of the mitigation measures would reduce the significance of the impacts but would not decrease them to a less than significant level.

The Oso Flaco Lake Alternative would significantly impact the following vegetation types: sand verbena-beach bursage series, dune lupine-goldenbush series, arroyo willow series, saltgrass series, bulrush-cattail series, cattail series, bur-reed series, agricultural lands, and open sand. This would result in the possible removal of marsh sandwort, sticky sand-verbena (red sand-verbena), Nuttall's locoweed, Blochman's leafy daisy, dune wallflower, dunedelion, crisp monardella, Blochman's groundsel, and Gambel's watercress.

Short-term impacts would include the effects of noise from construction equipment on avian fauna in and around the lake. If occurring during nesting season, disruption of nesting of several sensitive species such as yellow warbler and possibly southwestern willow flycatcher could result in abandonment of some nests, which, depending on the species, could be a significant impact. Steelhead and tidewater goby would not be impacted by this alternative. Western snowy plover and California least tern would be significantly impacted as vehicles would travel directly through their nesting sites. Long-term impacts would also include loss of habitat for Morro Boisduval's Blue, silvery legless lizard, California horned lizard, yellow warbler, northern harrier, and others.

Implementation of the mitigation measures would reduce the significance of the impacts but would not decrease them to a less than significant level.

The Little Oso Flaco Lake Alternative would significantly impact sand-verbena-beach bursage series, dune lupine-goldenbush series, arroyo willow series, bulrush-cattail series, open sand, and agricultural lands. This would result in the potential removal of Blochman's leafy daisy, crisp monardella, Nuttall's locoweed, dune wallflower, fuzzy prickly phlox, dunedelion, San Luis Obispo monardella, California spineflower, Blochman's groundsel and Gambel's watercress.

Steelhead and tidewater goby would not be impacted by this alternative. However, it is expected to lead to significant loss of habitat for Morro Boisduval's Blue, silvery legless lizard, California horned lizard, yellow warbler, western snowy plover, and California least tern.

Implementation of the mitigation measures would reduce the significance of the impacts but would not decrease them to a less than significant level.

# **B.** Traffic Impact Assessment

# **Existing Conditions at Pier Avenue and Grand Avenue:**

In 2005, a total of 335,656 street legal vehicles entered the park (D. Bellman, pers. comm. 2006). Visitation to the park was highest during the summer months, with the monthly visitation rate peaking in July with 53,474 vehicles entering the park (Chart 2). The highest daily visitation rates typically occurs during Fourth of July weekend (California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division 2003).

Table 6
Traffic Counts at Proposed Alternative Access Corridors

Access Route	Road	Average Daily Trips	Count date	Count location	PM Peak Count	AM Peak Count
Creek Road and Ocean Street	Railroad Street	927	Feb. 26, 1999	South of Air Park Drive	102 (12:00pm)	78 (10:00am)
Silver Spur Place	22 <sup>nd</sup> Street	SB 1218 NB 1318	Oct. 27, 2002	Southbound from North of Paso Robles Street and Northbound from South of Paso Robles Street	SB 138 (5:00pm) NB 143 (6:00pm)	SB 83 (9:00am) NB 88 (8:00am)
ConocoPhillips	Highway 1	SB 1270 NB 1232	May 2,1998	North of Halcyon Road	SB 132 NB 135 (3:00pm)	SB 82 (11:00am) NB 104 (7:00am)
Oso Flaco Lake Road and Little Oso Flaco Lake	Oso Flaco Lake Road	679	Sep. 3, 2003	West of Highway 1	83 (5:00pm)	114 (6:00am)

Source: County of San Luis Obispo Department of Traffic and Transportation webpage (2005).

# Methods: Proposed Alternatives:

To determine the potential impact of a new entrance, it was assumed that both current entrances would remain open but that crossing the creek to get to the OHV area would be prohibited. Therefore, all visitors wishing to access the riding area would have to use the new entrance and that the number of vehicles equals number of daily trips. This probably results in an estimate that is substantially higher than what should be expected since vehicles will remain parked in the SVRA for one or more days. It was assumed that 90% of the vehicles counted at the Pier Avenue entrance would use the new entrance. It was also assumed that all trips to the park would be in addition to traffic already present on the road.

To estimate peak traffic, attendance data from July 4, 2003 were used. On that date 3,977 vehicles used the Pier Avenue entrance. Assuming that 90% of these visitors would use the new access corridor, an estimated increase in traffic on peak days (such as July 4) 3,579 vehicles would be added to the corridor (Table 6). This number has been added to the current traffic counts for both the northbound and southbound directions for the existing roads to consider the effects of both traffic entering the park and traffic leaving the park. For roads where only a single traffic count was available that included both directions of traffic, it was assumed that equal volumes of traffic were moving in both directions.

# Impacts:

#### CC-I Traffic 1. Current Corridors:

Continued use of the current access corridors is not expected to have any new impacts on local roads and intersections.

### BB-I Traffic 2. Beach Bridge Options:

Development of either beach bridge alternative is expected to increase traffic on the beach itself and result in long traffic delays.

Table 7
<b>Expected Peak Traffic Counts at Proposed Alternatives</b>

Access Route	Road	Average Daily Trips	Expected Average Daily Trips on Holidays and other Peak Days		
Creek Road and Ocean Street	Railroad Street	927 SB 464 NB 464	SB 4,043 NB 4,043		
Silver Spur Place	22nd Street	SB 1,218 NB 1,318	SB 4,797 NB 4,897		
ConocoPhillips	Highway 1	SB 1,270 NB 1,232	SB 4,849 NB 4,811		
Oso Flaco Lake Road and Little Oso Flaco Lake	Oso Flaco Lake Road	679 EB 340 WB 340	SB 3,919 NB 3,919		

<sup>1.</sup> Source: County of San Luis Obispo Department of Traffic and Transportation webpage (2005).

#### COSS-I Traffic 1a. Creek Road:

If the Creek Road alternative is developed, the traffic load on Railroad Street is expected to increase on peak days by approximately 770% to over 4,000 vehicles traveling in each direction.

#### COSS-I Traffic 1b. Ocean Street:

If the Ocean Street alternative is developed, the traffic load on Railroad Street is expected to increase on peak days by approximately 770% to over 4,000 vehicles traveling in each direction.

## COSS-I Traffic 1c. Silver Spur Place:

On peak days, traffic on 22<sup>nd</sup> Street leading to the Silver Spur Place access alternative is expected to increase to more than 4,750 vehicles traveling in each direction, an increase of approximately 300%.

### CP-I Traffic 1. ConocoPhillips:

On holidays and other peak days, traffic on Highway 1 leading to the ConocoPhillips access alternative is expected to increase to over 4,800 vehicles in each direction, an increase of approximately 300%.

### OF &LOF-I Traffic 1. Oso Flaco Lake and Little Oso Flaco Lake:

If either alternative using Oso Flaco Lake Road is developed, the traffic load on Oso Flaco Lake Road on peak days is expected to

<sup>2.</sup> Source: Existing Average Daily Trips and Project's New Trips

increase to over 3,900 vehicles traveling in each direction, more than ten times its current level.

## Mitigation:

#### CC-M Traffic 1. Current Corridors:

Since no impacts are expected, no mitigation is required for their continued use.

# BB-M Traffic 2. Beach Bridge Options:

No mitigation is available.

# COSS-M Traffic 1a. Proposed Alternatives:

#### Railroad Street and Creek Road:

Railroad Street and Creek Road would need to be widened to 28 feet.

Required improvements would also involve creation of a signaled intersection at Highway 1 and an at-grade crossing of the railroad tracks.

The Arroyo Grande Creek levees would also need to be widened to 28 feet to support the additional traffic. The bridge across the creek and the new road through the Dunes Preserve would need to be made wide enough to handle the expected traffic.

#### COSS-M Traffic 1b. Ocean Street:

Railroad Street and Ocean Street would need to be widened to 28 feet.

Required improvements would also involve creation of a signaled intersection at Highway 1 and an at-grade crossing of the railroad tracks. (See ConocoPhillips Section for drawing of railroad crossing.)

The Arroyo Grande Creek levees would also need to be widened to 28 feet to support the additional traffic. The bridge across the creek and the new road through the Dunes Preserve would need to be made wide enough to handle the expected traffic.

### COSS-M Traffic 1c. Silver Spur Place:

22nd Street, Silver Spur Place, and Creek Road would need to be widened to 28 feet.

Required improvements would also involve creation of a signaled intersection at Highway 1 and an at-grade crossing of the railroad tracks.

The Arroyo Grande Creek south levee would also need to be widened from to 28 feet to support the additional traffic. The road through the Dunes Preserve and the bridge across Arroyo Grande Creek, if required, would have to be 26 feet wide.

### CP-M Traffic 1.

## ConocoPhillips:

The existing unpaved road from Highway 1 to the beach is not wide enough to support the expected level of traffic on peak days and will have to be widened to 28 feet. A signaled intersection at Highway 1 and an at-grade crossing of the railroad tracks would also be required, as well as a 25,000 square foot parking lot on top of the dunes at the end of the road.

#### **OF&LOF-M Traffic 1.**

#### Oso Flaco Lake and Little Oso Flaco Lake:

Oso Flaco Lake Road would need to be widened to 28 feet in order to support the additional traffic.

Required improvements would also involve creation of a signaled intersection at Highway 1 and an at-grade crossing of the railroad tracks.

For both the Oso Flaco Lake and Little Oso Flaco Lake alternatives, the existing road from Oso Flaco Lake Road towards the beach will need to be widened to 28 feet in order to support the additional traffic that is expected. A new road capable of supporting the expected traffic will have to be constructed through the dunes.

### **Residual Impacts:**

All of the alternatives would have significant residual impacts to traffic and circulation.

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# C. Archaeological Impact Assessment

The current phase one surface survey has supplemented the larger 2002-2004 survey conducted for the main portion of the Oceano Dunes State Vehicular Recreation Area (Gruver and Hines 2005). Of all seven new alternative routes that were surveyed, only Alternative #1, the existing access routes at Grand Avenue or Pier Avenue would have no direct adverse impacts on any known cultural resources (see Table1).

The prehistoric sites in the northern end of the project area appear to represent small seasonal habitation units that are part of a large social and political network connecting them with the coastal and interior regions. In the absence of subsurface testing information, the surface information suggests that all prehistoric sites should be considered potentially significant. Subsurface testing and analysis may indicate some duplication in site types and some loss of integrity for some sites. These factors may affect their significance when compared to other sites in the Oceano Dunes State Vehicle Recreation Area. While information from these sites could be significant and important to add to the overall picture of Chumash history in the Oceano Dunes region, after a Phase Two evaluation, a reasonable Phase Three data recovery program may mitigate any proposed adverse impacts. For all prehistoric sites that were recorded and possess integrity, such sites would be considered potentially significant and valuable to research of Chumash in San Luis Obispo County.

The potential impact of each proposed access alternative is considered in terms of the number and type of sites of cultural significance that fall within the 100 foot wide "Area of Potential Effect" (APE).

For purposes of this analysis, the APE is considered to be 50 feet in both directions from the center line of the proposed alternatives (100 foot width total).

# **Grand Avenue and Pier Avenue:**

## **Existing Conditions:**

Grand Avenue and Pier Avenue are both currently in use. Both corridors pass through developed commercial areas to the beach within Oceano Dunes SVRA. Grand Avenue, the northernmost entrance to the park, has less commercial development than Pier Avenue, which is the main entrance. Once reaching the park through either entrance, visitors drive south along the beach to the OHV staging area.

There are no known archaeological resource sites on or near either of these established access routes.

# Required Infrastructure:

Both Grand Avenue and Pier Avenue are currently being used as access corridors and do not require additional infrastructure for continued use.

## **Impacts:**

**GP-I Arch 1.** No new impacts are expected from the continued use of these access corridors.

# Mitigation:

**GP-M Arch 1.** No mitigation is required.

# Residual Impacts:

Continued use of the Grand and Pier access corridors would have an insignificant residual impact to archaeological resources.

# **Beach Bridge Options:**

#### *Impacts:*

**BB-I Arch 1**. No impacts would occur.

## Mitigation:

**BB-M Arch 1.** No mitigation is required.

# Creek Road, Ocean Street, and Silver Spur Place:

#### **Existing Conditions:**

The Creek Road Alternative is located south of the existing access corridors. It is reached from Highway 1 by turning west onto Railroad Street, crossing the railroad tracks, and then turning south onto Creek Road, where it passes along an agricultural field. From Creek Road the alternative would turn west onto the north levee of Arroyo Grande Creek, which would be followed towards the park. Before reaching the park it would be necessary to construct a bridge that would cross over to the south levee (Figure 4B). The final portion of the alternative from the south levee to the beach would pass through the Pismo Dunes Natural Preserve before reaching the beach.

**The Silver Spur Place Alternative** is located south of the existing corridors. It is reached by turning south from Highway 1 onto 22nd Street, then west onto Silver Spur Place. From Silver Spur Place, the alternative turns north between two agricultural fields to Arroyo Grande Creek's south levee. Currently, the alternative does not extend beyond this point.

If constructed, the alternative would follow the south levee toward the beach. Between the end of the south levee and the beach, the alternative would pass through a portion of Pismo Dunes Natural Preserve. Once at the beach, visitors would travel south along the beach to the OHV area.

## **Required Infrastructure:**

Construction of **the Creek Road Alternative** would require widening and paving Creek Road and sections of both the north and south levees. Construction of a bridge at the Guiton Crossing (Figure 4B) between the levees, as well as of entrance kiosks, restrooms, and other structures required for a new entrance would be necessary.

Construction of **the Silver Spur Place Alternative** would require paving part of the alternative leading to the south levee as well as the south levee itself. The south levee is currently not wide enough to support two-way traffic, so either the south levee would need to be widened or both the north and south levees would need to be used as one-way roads, in which case the entirety of both levees would need to be paved. Construction of a bridge between the levees and of the infrastructure required for a new entrance would also be required if both levees were used. Construction of entrance kiosks, restrooms, and other structures required for a new entrance would also be necessary.

## Impacts:

#### COSS-I Arch 1.

The Creek Road, Ocean Street, and Silver Spur Place Alternatives would directly impact two known cultural resource sites, one recorded as SLO-189-1967 and one identified as T-1. In addition, there are five other identified cultural resource sites (SLO-190-1967, SLO-191-1967, SLO-192-1967, SLO-193-1967, and SLO-454) that are in close proximity to the proposed alternative and could be impacted, but are not within the 100-foot APE.

## Mitigation:

#### COSS-M Arch 1.

The alternative should be re-routed to avoid sites SLO-189-1967 and T-1, as well as the other five sites that are nearby but outside of the APE. Because of the close proximity of these other five sites, avoidance of SLO-189-1967 and T-1 runs the risk of disturbing the other five. Avoiding SLO-189-1967 and T-1 should not come at the cost of disturbing the other nearby cultural resources.

#### COSS-M Arch 2.

Because the alternatives are so narrow, avoidance may not be feasible. If the sites are not avoided, intensive surface surveys and Phase II subsurface testing should be conducted to determine the boundaries of cultural sites SLO-189-1967 and T-1, and a plan developed and implemented by a professional archeologist for archiving materials from the site. C-14 dating of artifacts should also be conducted to determine antiquity.

#### COSS-M Arch 3.

If sites SLO-190-1967, SLO-191-1967, SLO-192-1967, SLO-193-1967, and SLO-454 are not avoided, they should be resurveyed, fenced off from the public, possibly post signs, and increase State Park patrols of the area.

#### COSS-M Arch 4.

If the sites are not avoided, Mitigations Arch 2 and Arch 3 should be implemented, and SLO-189-1967 and T-1 should be monitored during construction by a professional archaeologist and a Chumash representative.

# Residual Impacts:

After implementation of the mitigation measures, the residual impact to archaeological resources would be significant.

# ConocoPhillips:

## **Existing Conditions:**

The ConocoPhillips Alternative begins approximately ½ mile south of Callender Road at the entrance to the ConocoPhillips refinery on Highway 1. The alternative passes through the initial entrance to the refinery within ConocoPhillips privately-owned land, and then, after crossing over the railroad tracks, transverses through undeveloped land owned by ConocoPhillips that is leased to California State Parks. The road west from the railroad tracks is unpaved and crosses stabilized and unstabilized dunes.

### Required Infrastructure:

This alternative would require paving the existing road through the dunes, which currently extends from the railroad tracks at the ConocoPhillips refinery south and then west across three miles of both stabilized and unstabilized dunes directly to the OHV area, as well as constructing entrance kiosks, restrooms, and other infrastructure related to a new park entrance.

#### *Impacts:*

**CP-I Arch 1.** The proposed alternative would impact potential site NOAA#11.

### Mitigation:

**CP-M Arch 1**. The alternative should be re-routed to avoid site NOAA#11.

**CP-M Arch 2**. If the site is not avoided, an intensive surface survey and Phase II subsurface testing should be conducted to determine if a cultural site is indeed present, and if so, identify its boundaries. If a cultural site is identified, a plan should be developed and implemented by a

professional archeologist for archiving the materials from the site. C-14 dating of artifacts should be conducted to determine antiquity.

**CP-M Arch 3**. If the sites are not avoided, Mitigations Arch 2 should be implemented, and the site should be monitored during construction by a professional

archaeologist and a Chumash representative.

The residual impact of the ConocoPhillips Alternative to archaeological resources after mitigation is implemented would be insignificant.

## Oso Flaco Lake:

## **Existing Conditions:**

The Oso Flaco Lake Road Alternative is reached by turning west onto Oso Flaco Lake Road from Highway 1. Oso Flaco Lake Road passes through agricultural fields until it reaches the parking area for Oso Flaco Lake. After reaching the parking area a dirt path that is currently closed to vehicular traffic continues for 1.5 miles, passing next to Oso Flaco Lake, through a vegetated wetland area, and across the dunes towards the beach. Once at the beach, visitors would have to travel north along the beach to the riding area.

#### Required Infrastructure:

This alternative would require opening the road past the Oso Flaco Lake parking area to vehicular traffic. The road past Oso Flaco Lake would need to be widened from 8-17 feet to 28 feet. After Oso Flaco Lake, a paved road (28 feet wide) would need to be constructed through the dunes, and entrance kiosks, restrooms, and other infrastructure related to a new park entrance would need to be constructed. Widening of Oso Flaco Lake Road between Highway 1 and Oso Flaco Lake may also be required.

# Impacts:

OF-I Arch 1.

The Oso Flaco Lake Road Alternative would directly impact a known cultural resource site identified as Nancy's Nook. This site was identified as a historic site and possible prehistoric camp and food procurement site (Gruver and Hines 2005).

### Mitigation:

OF-M Arch 1.

The alternative should be re-routed to avoid Nancy's Nook.

OF-M Arch 2.

If the site is not avoided, intensive surface surveys and Phase II subsurface testing should be conducted to determine the boundaries of the cultural sites, and a plan developed and implemented by a professional archeologist for archiving the materials from the site. C-14 dating of artifacts should also be conducted to determine its antiquity. If the site is historic it should be evaluated for historical significance by a qualified historic archaeologist.

OF-M Arch 3.

If the site is not avoided, Mitigation Arch 2 should be implemented and the site should be monitored during construction by a professional archaeologist and a Chumash representative.

The residual impact of the Oso Flaco Lake Alternative to archaeological resources after mitigation is implemented would be insignificant.

## Little Oso Flaco Lake:

# **Existing Conditions:**

The Little Oso Flaco Lake Alternative is reached by turning west onto Oso Flaco Lake Road from Highway 1. Between Highway 1 and the turnoff to Little Oso Flaco Lake, Oso Flaco Lake Road passes through agricultural fields. From Oso Flaco Lake Road, the alternative turns north, passes between two fields, and crosses Little Oso Flaco Lake using an existing road over a culvert. On the north side of Little Oso Flaco Lake the alternative passes along an agricultural field before turning west and passing through stabilized and unstabilized dunes to the beach.

## **Required Infrastructure:**

Construction of this alternative would require widening the roads from 21 to 28 feet through the agricultural fields north and south of Little Oso Flaco Lake and of the road across the lake, constructing a road through the agricultural field (28 feet wide) and the dunes on the north side of the lake to the beach, and possibly widening Oso Flaco Lake Road. Entrance kiosks, restrooms, and other infrastructure relating to a new park entrance would also have to be constructed.

## **Impacts:**

**LOF-I Arch 1.** LOF #1 within 100 feet of this alternative's APE. It could be significantly impacted by construction.

# Mitigation:

**LOF-M Arch 1.** The alternative should be re-routed to avoid the site.

LOF-M Arch 2. If the site is not avoided, intensive surface surveys and Phase II subsurface testing should be conducted to determine the boundaries of the cultural sites, and a plan developed and implemented by a professional archeologist for archiving the materials from the site. C-14 dating of artifacts should also be conducted to determine its antiquity.

LOF-M Arch 3. If the site is not avoided, Mitigation Arch 2 should be implemented and the site should be monitored during construction by a professional archaeologist and a Chumash representative.

The residual impact of the Little Oso Flaco Lake Alternative to archaeological resources after mitigation is implemented would be insignificant.

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# D. Visual Impact Assessment

## **Grand Avenue and Pier Avenue:**

## **Existing Conditions:**

Grand Avenue and Pier Avenue are both currently in use as access corridors. Both corridors pass through developed commercial areas to the beach within Oceano Dunes SVRA. Pier Avenue, currently the main entrance to the park, has more commercial development than Grand Avenue. Once reaching the park through either entrance, visitors drive south along the beach to the OHV staging area.

## Required Infrastructure:

Both Grand Avenue and Pier Avenue are currently being used as access corridors and do not require additional infrastructure for continued use.

#### Impacts:

**GP-I Visual 1.** No new visual impacts are expected from the continued use of the

Grand Avenue and Pier Avenue entrances.

# Mitigation:

**GP-M Visual 1.** As no impacts are expected, no mitigation is required.

# **Beach Bridge Options:**

# **Existing Conditions:**

Hundreds, sometimes thousands, of vehicles everyday, drive on the sandy beach.

# Required Infrastructure for the Beach Bridge Options:

## Construction and operation of *Beach Bridge Option 1* would include:

- 1. Portable one lane bridge structure with spread footing directly on sand. Total maximum length: 30 feet; total maximum length of span above water: 20 feet. Total maximum height: 24 to 40 inches with 8 to 16 inch clearance. A second one lane bridge could be put in to place parallel to the first bridge.
- 2. This would be dragged into place.
- 3. Heavy equipment would work in the creek and would be required to be dedicated to moving the bridge and preparing the beach twice each day to accommodate the shifting creek and tide. The work of moving the bridge and preparing the beach is expected to take some time and on busy days is expected to result in significant traffic delays and backups on the beach, including the area in front of the residences on Strand Way.
- 4. It would require full-time dedicated staff to oversee and enforce traffic operation at the beach.

## Construction and operation of *Beach Bridge Option 2* would include:

- 1. Driving concrete piles into the sand at the beach until bedrock is reached. A second set of piles could be driven into the sand to accommodate a second one lane bridge parallel to the first bridge.
- 2. Pulling movable bridge sections into place and fastening them to the concrete piles.
- 3. A vehicle would be required to be dedicated to moving the bridge to accommodate the shifting creek.
- 4. It would require full-time dedicated staff to oversee and enforce traffic operation at the beach.

#### **Impacts:**

BB-I Visual 1. The visual impact of Beach Bridge Option 1 would not be substantially different from the existing setting given its relatively low vertical height. Beach Bridge Option 2 would have more of an impact to the visual resources of the beach given the permanent status of the concrete piers and the height of the bridge. This impact is not expected to change the environment.

## Mitigation:

**BB-M Visual 1.** No feasible mitigation measures have been identified.

## Residual Impacts:

The residual impact of Beach Bridge Options 1 and 2 would be insignificant.

## **Creek Road:**

### **Existing Conditions:**

The portions of this alternative along Railroad Street, Creek Road, and the beginning of the north levee are visible from Highway 1 and from an existing residence on Creek Road. The remainder of the north levee is visible from the Oceano Airport and an industrial area adjacent to the levee. Portions of the south levee are visible from a ranch and an existing residence adjacent to the south levee. The view in this area currently consists of an agricultural field and an industrial area. The levees currently consist of dirt roads backed by vegetation.

#### Required Infrastructure:

Construction of this alternative would require paving Creek Road and sections of both the north and south levees. The levees are currently not wide enough to support two-way traffic, so either the north levee would need to be widened or both the north and south levees would need to be used as one-way roads, in which case the entirety of both levees would need to be paved. Construction of a bridge between the levees and of entrance kiosks, restrooms, and other structures required for a new entrance would also be necessary.

#### **Impacts:**

- C-I Visual 1. The visual impact along Creek Road is not expected to be significant. The additional traffic generated by the use of these roads as a park entrance is not expected to significantly degrade the existing view.
- C-I Visual 2. Constructing roads on the levees could degrade the quality of the view of the vegetation as seen from the airport or existing residences along the south levee.
- **C-I Visual 3.** Construction of a road through a portion of the Dunes Preserve would change the aesthetic character of that section of the Preserve.
- **C-I Visual 4.** Headlights and streetlights (if the roads leading to the park entrance are illuminated at night) would change the character of the area.
- **C-I Visual 5.** Construction of the required infrastructure for a new park entrance is not expected to have a significant impact, as the new structures would only be visible from within the park.

#### Mitigation:

- C-M Visual 1. The visual impacts of the levee road and through the Dunes Preserve could be reduced through landscaping designed to screen the road from visitors walking through the Preserve. Shifting the proposed bridge west would eliminate some of the visual impacts to residents and visitors along the south levee.
- **C-M Visual 2.** Impacts caused by night lighting could be reduced by designing the lighting system so that light is focused only where it is required and glare is minimized.

#### Residual Impacts:

Implementation of the mitigation measures would reduce the significance of the impacts to adverse, but the visual impacts to the Dunes Preserve would remain significant.

## **Ocean Street:**

#### **Existing Conditions:**

The portion of this alternative along Railroad Street is visible from Highway 1. The portion on Ocean Street and the north levee is visible from the Oceano Airport and the industrial area adjacent to the levee. Portions of the south levee are visible from a ranch and existing residence adjacent to the south levee. The view in this area currently consists of an industrial area. The levees currently consist of dirt roads backed by vegetation.

#### Required Infrastructure:

Construction of this alternative would require widening Railroad Street and Ocean Street and widening and paving sections of both the north and south levees. Construction of a bridge between the levees and of entrance kiosks, restrooms, and other structures required for a new entrance would also be necessary.

### Impacts:

- O-I Visual 1. The visual impacts along Railroad Street and Ocean Street are not expected to be significant. The additional traffic generated by the use of these roads as a park entrance is not expected to significantly degrade the existing view.
- O-I Visual 2. Constructing roads on the levees could degrade the quality of the view of the vegetation as seen from the airport or existing residences along the south levee.
- **O-I Visual 3.** Construction of a road through a portion of the Dunes Preserve would change the aesthetic character of that section of the Preserve.
- **O-I Visual 4.** If the roads leading to the park entrance are illuminated at night, this could change the character of the area.
- O-I Visual 5. Construction of the required infrastructure for a new park entrance is not expected to have a significant impact, as the new structures would only be visible from within the park.

#### Mitigation:

- O-M Visual 1. The visual impacts of the levee road and the road through the Dunes Preserve could be reduced through landscaping designed to screen the road from visitors walking through the Preserve. Shifting the proposed bridge west would eliminate some of the visual impacts to residents and visitors along the south levee.
- O-M Visual 2. Impacts caused by night lighting could be reduced by designing the lighting system so that light is focused only where it is required and glare is minimized.

#### Residual Impacts:

Implementation of the mitigation measures would reduce the significance of the impacts to adverse, but the visual impact to the Dunes Preserve would remain significant.

## **Silver Spur Place:**

## **Existing Conditions:**

The portion of this alternative along 22nd Street is visible from Highway 1. The portion of the alternative between 22nd Street and the south levee, as well as part of the levee, is visible from an existing ranch and residence.

#### Required Infrastructure:

Construction of this alternative would require paving part of the alternative leading to the south levee as well as the south levee itself. Construction of a bridge between the levees and of the infrastructure required for a new entrance would also be required if both levees were used. Construction of entrance kiosks, restrooms, and other structures required for a new entrance would also be necessary.

### Impacts:

- SS-I Visual 1. No visual impacts are expected along 22nd Street. This is an existing road through an industrial area, and additional traffic is not expected to degrade the visual appearance of the area.
- SS-I Visual 2. The area from 22nd Street to the levee, through an agricultural area, is not expected to have any significant visual impacts to public views. There are few receptors in this area (the ranch and existing residences), and much of the road along the levee is already partially screened from their view by vegetation.
- **SS-I Visual 3**. Construction of a road through a portion of the Dunes Preserve would substantially change the aesthetic character of that section of the Preserve.
- **SS-I Visual 4.** If the roads leading to the park entrance are illuminated at night, this could change the character of the area.
- SS-I Visual 5. Construction of the required infrastructure for a new park entrance is not expected to have a significant impact, as the new structures would only be visible from within the park.

#### Mitigation:

- **SS-M Visual 1.** The visual impacts of the road through the Dunes Preserve should be reduced by installation and maintenance of landscaping designed to screen the road and large vehicles.
- SS-M Visual 2. Impacts caused by illumination of the alternative could be reduced by designing the lighting system so that light is focused only where it is required and glare is minimized. Landscaping designed to screen the

road would reduce some of the visual impacts associated with this alternative.

## Residual Impacts:

Implementation of the mitigation measures would reduce the significance of the impacts, but the visual impact to the Dunes Preserve would remain significant.

## **ConocoPhillips:**

## **Existing Conditions:**

The segment of this alternative between Highway 1 and the refinery is visible from Highway 1. The remainder of this alternative is screened from view by the local topography.

### Required Infrastructure:

This alternative would require construction of a paved road extending from the railroad tracks across both stabilized and unstabilized dunes directly to the OHV area, as well as entrance kiosks, restrooms, and other infrastructure related to a new park entrance.

## Impacts:

**CP-I Visual 1.** The segment of the road and the vehicles traveling on that road would alter public views from Highway 1.

## Mitigation:

**CP-M Visual 1.** Landscaping should be installed to screen the road and traffic as much as possible.

#### **Residual Impacts:**

Implementation of the mitigation measures would reduce the significance of the impacts to adverse, but less than significant.

## Oso Flaco Lake:

#### **Existing Conditions:**

A portion of this alternative between Highway 1 and the parking area for Oso Flaco Lake is visible from Highway 1. Other portions are visible from the Oso Flaco Lake Natural Area.

#### Required Infrastructure:

This alternative would require opening and widening the road past the Oso Flaco Lake parking area to vehicular traffic. After Oso Flaco Lake, a paved road would need to be constructed through the dunes, and entrance kiosks, restrooms, and other infrastructure related to a new park entrance would need to be constructed. Widening of Oso Flaco Lake Road between Highway 1 and Oso Flaco Lake may also be required.

#### **Impacts:**

- **OF-I Visual 1.** Between Highway 1 and Oso Flaco Lake Natural Area, this section of the alternative would utilize an existing road between agricultural fields, and increased traffic on this road is not expected to significantly change the visual character of the area.
- **OF-I Visual 2.** The section of the alternative passing through Oso Flaco Lake Natural Area will substantially change its visual character of that section of the park.
- **OF-I Visual 3.** Illumination of the roads leading to the park entrance and vehicle lights driving at night would substantially change the visual character of the area.
- **OF-I Visual 4.** Construction of the required infrastructure for a new park entrance is not expected to have a significant impact, as the new structures would only be visible from within the park.

## Mitigation:

- **OF-M Visual 1.** Impacts within Oso Flaco Lake Park could be reduced by landscaping designed to screen the entrance road from the rest of the park
- **OF-M Visual 2.** Impacts caused by illumination of the alternative could be reduced by designing the lighting system so that light is focused where it is required and glare is minimized and by installation and maintenance of landscaping along the roadside.

## **Residual Impacts:**

Implementation of the mitigation measures would reduce the significance of the impacts but they would remain significant.

## **Little Oso Flaco Lake:**

#### **Existing Conditions:**

A portion of this alternative between Highway 1 and the Little Oso Flaco Lake turnoff is visible from Highway 1. The remainder of the alternative is screened from public view by vegetation and topography.

## **Required Infrastructure:**

Construction of this alternative would require widening the roads through the agricultural fields on both sides of Little Oso Flaco Lake and of the road across the lake, constructing a road through the dunes from the agricultural field on the north side of the lake to the beach, and possibly widening Oso Flaco Lake Road. Entrance kiosks, restrooms, and other infrastructure relating to a new park entrance would also be required.

### Impacts:

- LOF-I Visual 1. The section of the alternative where traffic is moving north on Highway 1 between Oso Flaco Lake Road and Callender Road may interfere for several seconds with the view of Oso Flaco Lake Natural Area.
- **LOF-I Visual 2.** Illumination of the roads leading to the park entrance and vehicle lights driving at night would change the visual character of the area.

## Mitigation:

- LOF-M Visual 1. Impacts to Oso Flaco Lake Natural Area could be reduced by landscaping designed to screen the entrance road from the rest of the park
- **LOF-M Visual 2.** Impacts caused by illumination of the alternative could be reduced by designing the lighting system so that light is focused where it is required and glare is minimized and by installation and maintenance of landscaping along the roadside.

#### Residual Impacts:

Implementation of the mitigation measures would reduce the significance of the impacts but they would remain significant.

## E. Hydrology and Water Quality Impact Assessment

Climate, hydrology and water quality are described in detail in Section III of this report. The principal watercourse in the northern portion of the SVRA is Arroyo Grande Creek. The lagoon at the SVRA receives water from Arroyo Grande Creek, as well as Meadow Creek, and Los Berros Creek. There is no creek or other drainage course in the vicinity of the ConocoPhillips corridor; however, there are two freshwater dune lakes in close proximity to the road. CCAMP does not monitor water quality at Jack Lake or Lettuce Lake. At the southern end of the park, Oso Flaco Creek flows into Little Oso Flaco Lake and Oso Flaco Lake. Please refer to Section III for further information.

Impacts to water quality as a result of construction and long-term operation of any one of the proposed alternatives are expected to be limited to pollutants such as (1) petroleum related organics (hydrocarbons) from road and bridge construction or fuel, oil, and other machinery or vehicle fluid leaks from long-term operation, and 2) fecal coliform and other pathogens from horse excrement. Agricultural runoff (inputs of organic chemicals) is not expected to change as a result of the project.

## **Grand Avenue and Pier Avenue:**

## **Existing Conditions:**

The Central Coast Monitoring Program (CCAMP) currently monitors water quality in Arroyo Grande Creek at the 22<sup>nd</sup> street bridge and at Arroyo Grande Creek Lagoon. Conventional pollutant data are not available at the Arroyo Grande Creek Lagoon; however, heavy metals such as cadmium, copper, lead, and mercury were reported at acceptable levels in 1998 (The Central Coast Monitoring Program 2006). Conventional pollutants such as fecal coliform and pH at the 22<sup>nd</sup> street bridge (upstream of the Guiton Crossing) were reported at critical levels between 2001 and 2003 (The Central Coast Monitoring Program 2006), while dissolved oxygen (DO) was reported at a cautionary level (The Central Coast Monitoring Program 2006).

Public concern has been expressed regarding potential pollutants from equestrian crossings of Arroyo Grande Creek at the Guiton Crossing. While CCAMP takes measurements of fecal coliform and other pollutants upstream at the 22<sup>nd</sup> Street bridge, we are not aware of similar tests that have been routinely conducted in the lagoon, other than for toxic pollutants such as copper, lead, and mercury which were reported at acceptable levels in 2000 (The Central Coast Monitoring Program 2006). Further details are provided in Appendix 7.

#### **Impacts:**

**GP-I Water 1:** No new impacts are expected from the continued use of these access corridors.

**GP-I Water 2:** Petrochemical pollutants could enter Arroyo Grande Creek in the event

of a person unlawfully attempting to cross the creek in a vehicle at high

flows and/or high tide, getting stuck, and turning over.

## Mitigations:

GP-M Water 1: An equine waste management plan should be developed and

implemented for the Arroyo Grande Creek levees and the SVRA. Possible measures that should be considered include: 1) payment of a fee to be collected by State Parks that would fund weekly (or more frequent) cleaning of the levees, trail, and beach surfaces, 2) limiting the number of horses per day, or 3) allowing the land to rest for a regularly scheduled period of time such as one week per month, or one month

per year.

GP-M Water 2: Installation of a convenience store on the beach that would sell

groceries (perhaps on a movable trailer) should be considered in order to eliminate some of the trips across the creek associated with campers

camping on the beach.

## Residual Impacts:

Continued use of the Grand and Pier access corridors would not substantially change the existing setting.

## **Beach Bridge Options:**

## **Existing Conditions:**

Water quality data are not available for this location, as sampling is not conducted at the mouth of Arroyo Grande Creek.

#### **Impacts:**

**BB-I Water 1:** Use of the access corridor would reduce the potential for runoff of

petroleum related organics (hydrocarbons) at periods of low flows in Arroyo Grande Creek when the risk of a spill is the lowest. This would

be a beneficial impact.

## Mitigation:

**BB-M Water 1.** No mitigation is required.

#### Residual Impacts:

The residual impact of the beach bridge alternatives to water quality would be beneficial.

## Creek Road, Ocean Street, Silver Spur Place:

#### Existing Conditions:

Please refer to Grand Avenue and Pier Avenue existing conditions.

#### Impacts:

COSS-I Water 1:

Construction of a bridge across Arroyo Grande Creek at Guiton Crossing could potentially contribute to short-term increased turbidity, sedimentation, and pollution from construction machinery leaks or spills.

COSS-I Water 2.

Long-term use of the access corridor could potentially contribute to pollution in the form of runoff from petroleum related organics (hydrocarbons) in the event of fuel and other vehicle fluid leaks or spills onto the levee(s) and into the creek. However, it is also possible that potential petrochemical runoff may decrease due to some vehicles being driven on the bridge rather than through the creek at the beach.

COSS-I Water 3.

Potential water quality degradation may decrease as equestrians would continue to use the levees and the trail, but would use the bridge to cross the creek.

## Mitigation:

COSS-M Water 1. Measures such as silt fencing, straw waddles, catch basins, sediment traps, dewatering and other techniques, should be used during paving and widening of the levees and bridge construction to protect slopes, prevent erosion, and minimize deposition of sediment into Arroyo Grande Creek and Arroyo Grande Creek Lagoon.

COSS-M Water 2. Workers should be trained prior to construction in methods and techniques to minimize potential spills and leaks or petroleum related organics.

COSS-M Water 3.

"Grease traps" should be installed to prevent oil and other hydrocarbons from entering Arroyo Grande Creek and Arroyo Grande Creek Lagoon. Filters and traps should be examined and maintained periodically to remain in working order.

COSS-M Water 4. An equine waste management plan should be developed and implemented for the Arroyo Grande Creek levees and the SVRA. Possible measures that should be considered include: 1) payment of a fee to be collected by State Parks that would fund weekly (or more frequent) cleaning of the levees, trail, and beach surfaces, 2) limiting the number of horses per day, or 3) allowing the land to rest for a regularly scheduled period of time such as one week per month or one month per year.

## **Residual Impacts:**

The residual impact of the Creek Road access corridor to water quality after the mitigation measures have been implemented may still be significant.

## ConocoPhillips:

#### **Existing Conditions:**

### **Impacts:**

**CP-I Water 1.** Widening of the existing road could potentially contribute sediment to Jack Lake and Lettuce Lake.

CP-I Water 2. Similarly, long-term operation of the access corridor could potentially contribute to pollution in the form of runoff from petroleum related organics (hydrocarbons) in the event of fuel and other vehicle fluid leaks or spills, and sediment deposition in the lakes.

## Mitigation:

CP-M Water 1. Measures such as silt fencing, catch basins, sediment traps, dewatering and other techniques, should be used during paving and widening of the road to protect slopes, prevent erosion, and minimize deposition of sediment into Jack Lake and Lettuce Lake. Workers should be trained prior to construction in methods and techniques to minimize potential spills and leaks of petroleum related organics.

**CP-M Water 2.** "Grease traps" should be installed to prevent oil and other hydrocarbons from entering Jack Lake and Lettuce Lake. Filters and traps should be examined and maintained periodically to remain in working order.

#### Residual Impacts:

The residual impact of the ConocoPhillips access corridor to water quality after the mitigation measures have been implemented may still be significant.

## Oso Flaco Lake:

#### **Existing Conditions:**

CCAMP currently monitors water quality at Oso Flaco Creek at Oso Flaco Lake Road. Conventional pollutants such as ammonia, fecal coliform, nitrate, and DO were reported at critical levels; pH was reported at a cautionary level between 2000-2001 (The Central Coast Monitoring Program 2006) (Appendix 7). Toxic pollutants levels are not available from this collection site.

## Impacts.

**OF-I Water 1.** Widening of the existing road and construction of the culvert at the lake could potentially contribute sediment to Oso Flaco Creek and Oso Flaco Lake.

**OF-I Water 2.** Prolonged use of the access corridor could potentially contribute to pollution in the form of runoff from petroleum related organics (hydrocarbons) in the event of fuel and other vehicle fluid leaks or

spills, sediment deposition, and increased turbidity in Oso Flaco Lake.

## Mitigation.

**OF-M Water 1:** Measures such as silt fencing, catch basins, sediment traps, dewatering

and other techniques, should be used during paving and widening of the levee to protect slopes, prevent erosion, and minimize deposition of

sediment into Oso Flaco Creek and Oso Flaco Lake.

OF-M Water 2. Workers should be trained prior to construction in methods and

techniques to minimize potential spills and leaks of petroleum related

organics.

**OF-M Water 2.** "Grease traps" should be installed to prevent oil and other

hydrocarbons from entering Oso Flaco Lake and Oso Flaco Creek. Filters and traps should be examined and maintained periodically to

remain in working order.

## **Residual Impacts:**

The residual impact of the Oso Flaco Lake access corridor to water quality after the mitigation measures have been implemented may still be significant.

## Little Oso Flaco Lake:

## **Existing Conditions:**

CCAMP currently monitors water quality at Little Oso Flaco Lake. Conventional pollutants such as coliform (total), nitrate as N and nitrate as NO3 were reported at critical levels, while fecal coliform, DO, and pH were reported at cautionary levels (The Central Coast Monitoring Program 2006) (Appendix 7).

#### Impacts:

LOF-I Water 1. Construction of a culvert crossing across Little Oso Flaco Lake could

potentially contribute to increased turbidity, sedimentation, and

pollution from construction machinery leaks or spills.

LOF-I Water 2. Long-term use of the access corridor could potentially contribute to

pollution in the form of runoff from petroleum related organics (hydrocarbons) in the event of fuel and other vehicle fluid leaks or

spills, sediment deposition, and increased turbidity in the creek.

## Mitigation:

LOF-M Water 1.

Measures such as silt fencing, catch basins, sediment traps, dewatering and other techniques, should be used during paving and widening of the levee to protect slopes, prevent erosion, and minimize deposition of sediment into Little Oso Flaco Creek. Workers should be trained prior to construction in methods and techniques to minimize potential spills and leaks of petroleum related organics.

LOF-M Water 2.

"Grease traps" should be installed to prevent oil and other hydrocarbons from entering Little Oso Flaco Creek. Filters and traps should be examined and maintained periodically to remain in working order.

## Residual Impacts:

The residual impact of the Little Oso Flaco Lake access corridor to water quality after the mitigation measures have been implemented may still be significant.

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## F. Noise Impact Assessment

## **Grand Avenue and Pier Avenue:**

#### **Existing Conditions:**

Grand Avenue and Pier Avenue are both currently in use as access corridors. Both corridors pass through developed commercial areas to the beach within Oceano Dunes SVRA. Grand Avenue, the northernmost entrance to the park, has less commercial development than Pier Avenue, which is the main entrance. Drivers, once reaching the park through either entrance, drive south along the beach to the OHV staging area.

Current sources of noise along these two corridors include traffic along Grand Avenue and Pier Avenue, noise generated by the commercial areas along the corridors, and noise generated by vehicles in the park.

#### Required Infrastructure:

Both Grand Avenue and Pier Avenue are currently being used as access corridors and do not require additional infrastructure for continued use.

### Impacts:

**GP-I Noise 1**. No new impacts are expected from their continued use.

## Mitigation:

**GP-M Noise 1.** No mitigation is required.

#### Residual Impacts:

The residual noise impact would be insignificant.

## **Beach Bridge Options:**

## **Existing Conditions:**

The beach in the riding area is presently a noisy environment, similar to an urban road with a considerable amount of traffic on weekends and holidays.

#### Required Infrastructure for the Beach Bridge Options:

#### Construction and operation of *Beach Bridge Option 1* would include:

- 1. Portable one lane bridge structure with spread footing directly on sand. Total maximum length: 30 feet; total maximum length of span above water: 20 feet. Total maximum height: 24 to 40 inches with 8 to 16 inch clearance. A second one lane bridge could be put in to place parallel to the first bridge.
- 2. This would be dragged into place.

- 3. Heavy equipment would work in the creek and would be required to be dedicated to moving the bridge and preparing the beach twice each day to accommodate the shifting creek and tide. The work of moving the bridge and preparing the beach is expected to take some time and on busy days is expected to result in significant traffic delays and backups on the beach, including the area in front of the residences on Strand Way.
- 4. It would require full-time dedicated staff to oversee and enforce traffic operation at the beach.

### Construction and operation of *Beach Bridge Option 2* would include:

- 1. Driving concrete piles into the sand at the beach until bedrock is reached. A second set of piles could be driven into the sand to accommodate a second one lane bridge parallel to the first bridge.
- 2. Pulling movable bridge sections into place and fastening them to the concrete piles.
- 3. A vehicle would be required to be dedicated to moving the bridge to accommodate the shifting creek.
- 4. It would require full-time dedicated staff to oversee and enforce traffic operation at the beach.

## **Impacts:**

BB-I Noise 1. Short-term construction noise could be associated with beach bridge option 2, which would require concrete piles to be driven into the sand. Operation of the bridges would create long-term noise generated by the heavy equipment that would be required to move either bridge option into place. Given the existing level of vehicle noise at the beach, this would not be a significant change in the existing environment.

#### Mitigation:

**BB-M Noise 1.** No mitigation is required.

### Residual Impacts:

The residual noise impact would be insignificant.

#### Creek Road:

## **Existing Conditions:**

Current sources of noise along this alternative include the Oceano Airport and an industrial area, both of which are adjacent to the north levee of Arroyo Grande Creek.

#### Required Infrastructure:

Construction of this alternative would require paving Creek Road and sections of both the north and south levees. The levees are currently not wide enough to support two-way traffic, so either the north levee would need to be widened or both the north and south levees would need to be used as one-way roads, in which case the entirety of both levees would need to be paved. Construction of a bridge between the levees as well as entrance

kiosks, restrooms, and other structures required for a new entrance would also be necessary.

#### Impacts:

- **C-I Noise 1.** There is an existing residence on Creek Road near the north levee that would be impacted by both short-term construction noise and long-term noise generated by use of Creek Road as part of an access corridor.
- **C-I Noise 2.** No impacts are expected in the portion of the alternative that uses the north levee. The only receptors in this area are the airport and the industrial area, which are not sensitive receptors.
- C-I Noise 3. Depending on where the bridge from the north levee to the south levee is constructed, a ranch and existing residences located adjacent to the south levee could be impacted by short-term noise generated by construction activities and long-term noise generated through use of the south levee as an access corridor.
- **C-I Noise 4.** The section of the access alternative that passes through the Dunes Preserve would increase noise levels in part of the Preserve both during construction and while the alternative is in use. This would substantially affect visitors walking in the Dunes Preserve.
- **C-I Noise 5.** Noise levels within the SVRA are not expected to be greater than those resulting from continued use of the current access corridors.

#### Mitigation:

- **C-M Noise 1.** The timing of construction should be limited to Monday-Friday from 7 am to 5 pm and prohibited on federal holidays. Advance warning of the timing of construction should be provided. Long-term impacts from use of the alternative should be minimized through the use of rubberized asphalt to pave the sections of the levees where paving is required.
- **C-M Noise 2.** Impacts to the ranch and existing residences along the south levee could be minimized or eliminated by constructing the bridge across Arroyo Grande Creek 100 feet to the west of the residences.

#### Residual Impacts:

The residual noise impact (after mitigation) would be insignificant, except in the Dunes Preserve where it would be significant.

## **Ocean Street:**

## **Existing conditions:**

The Ocean Street alternative is located south of the existing access corridors. It is reached from Highway 1 by turning west onto Railroad Street, crossing the railroad tracks, and then turning west onto Ocean Street. From there, the alternative would pass through an industrial area and pass alongside the Oceano airport before reaching the north levee of Arroyo Grande Creek. After reaching the levee this alternative is identical to the Creek Road alternative.

Current sources of noise along this alternative include the Oceano Airport and an industrial area, both of which are adjacent to the north levee of Arroyo Grande Creek.

### Required Infrastructure:

Construction of this alternative would require widening Railroad Street and Ocean Street and widening and paving sections of both the north and south levees. Construction of a bridge between the levees and of entrance kiosks, restrooms, and other structures required for a new entrance would also be necessary.

## **Impacts:**

- O-I Noise 1. No impacts are expected in the portion of the alternative that passes through the industrial area or the portion that uses the north levee. The only potential receptors in this area are the airport and the industrial area, which are not sensitive receptors.
- O-I Noise 2. Depending on where the bridge from the north levee to the south levee is constructed, a ranch and existing residences located adjacent to the south levee could be impacted by short-term noise generated by construction activities and long-term noise generated through use of the south levee as an access corridor.
- O-I Noise 3. The section of the access alternative that passes through the Dunes Preserve would increase noise levels in part of the Preserve both during construction and while the alternative is in use. This would substantially affect visitors walking in the Dunes Preserve.
- **O-I Noise 4.** Noise levels within the park are not expected to be greater than those resulting from continued use of the current access corridors.

#### Mitigation:

**O-M Noise 1.** The timing of construction should be limited to Monday-Friday from 7 am to 5 pm and prohibited on federal holidays. Advance warning of the timing of construction should be provided. Long-term impacts from use of the alternative should be minimized through the use of rubberized asphalt to pave the sections of the levees where paving is required.

O-M Noise 2. Impacts to the ranch and existing residences along the south levee could be minimized or eliminated by constructing the bridge across Arroyo Grande Creek 100 feet to the west of the residences.

### Residual Impacts:

The residual noise impact (after mitigation) would be insignificant.

## Silver Spur Place:

#### **Existing Conditions:**

The Silver Spur Place access alternative is located in a relatively quiet agricultural area. The Pacific Dunes Ranch and existing residences are located adjacent or near the south levee. The Dunes Preserve is a relatively quiet natural area.

#### Required Infrastructure:

Construction of this alternative would require paving part of the alternative leading to the south levee as well as the south levee itself.

## Impacts:

- SS-I Noise 1. No new impacts are expected between Highway 1 and Silver Spur place, as it would use roads that are already in use.
- SS-I Noise 2. Short-term noise generated by construction and long-term noise generated by use of this alternative is expected to impact Pacific Dunes Ranch and the adjacent residences.
- SS-I Noise 3. The Dunes Preserve would experience increased noise levels during construction and while the alternative is in use. This would substantially affect visitors walking in the Dunes Preserve.
- SS-I Noise 4. If the alternative is constructed using both the north and south levees, there may be long-term noise impacts to an existing private residence next to the south levee.
- SS-I Noise 5. Noise levels within the park are not expected to be greater than those resulting from continued use of the current access corridors.

## Mitigation:

SS-M Noise 1. The timing of construction should be limited to Monday-Friday from 7 am to 5 pm and prohibited on federal holidays. Advance warning of the timing of construction should be provided. Short-term impacts from construction of the alternative can be mitigated by providing advance warning of when construction will take place so that residents can plan for the impact and shielding stationary construction equipment to

reduce noise levels. Since noise impacts are generally considered to be greater at night, construction hours should be restricted to daylight hours during the week.

SS-M Noise 2.

Long term operational impacts from the use of the alternative can be mitigated through the use of rubberized asphalt when paving of the levees and other sections of the corridor. Along some sections of the corridor, sound walls could be installed to further reduce noise levels.

## Residual Impacts:

The residual noise impact in the Dunes Preserve and to the residences adjacent to the south levee would be significant.

## **ConocoPhillips:**

### **Existing Conditions:**

The ConocoPhillips Alternative passes through private, mostly undeveloped land using an unpaved road that crosses stabilized and unstabilized dunes. Once it crosses the railroad tracks, this is a very quiet, rural area.

#### Required Infrastructure:

This alternative would require construction of a paved road extending from the ConocoPhillips refinery across both stabilized and unstabilized dunes directly to the OHV area, as well as entrance kiosks, restrooms, and other infrastructure related to a new park entrance.

#### Impacts:

**CP-I Noise 1.** Construction of this alternative is not expected to have any noise impacts. The only potential receptor along the alternative is the ConocoPhillips refinery, which is not a sensitive receptor.

#### Mitigation:

**CP-M Noise 1.** As no impacts are expected, no mitigation is required.

#### Residual Impacts:

The residual noise impact (after mitigation) would be insignificant.

#### Oso Flaco Lake:

#### **Existing Conditions:**

Oso Flaco Lake Road passes through agricultural fields until it reaches the parking area for Oso Flaco Lake. After reaching the parking area, a dirt road that is currently closed to vehicular traffic continues past Oso Flaco Lake and through a vegetated wetland area to

the dunes. In the dunes area an unpaved trail passes through stabilized dunes towards the beach. After 300 feet past the gate, this is a very quiet natural area.

## Required Infrastructure:

This alternative would require opening the road past the Oso Flaco Lake parking area to vehicular traffic. The road past Oso Flaco Lake would need to be widened to at least twice its existing width and paved. After Oso Flaco Lake, a paved road would need to be constructed through the dunes. In addition, an entrance kiosk, restrooms, and other infrastructure related to a new park entrance would need to be constructed. Widening of Oso Flaco Lake Road between Highway 1 and Oso Flaco Lake may also be required.

#### Impacts:

- **OF-I Noise 1.** The section of the alternative next to Oso Flaco Lake would increase noise levels near the lake during construction and during continued operation of the corridor. These impacts are expected to be significant to visitors of the lake.
- **OF-I Noise 2.** No impacts are expected in the section of the alternative between Highway 1 and Oso Flaco Lake area, as there are no sensitive receptors in this area.
- **OF-I Noise 3.** Noise levels within the off-road area of the park are not expected to be greater than those resulting from continued use of the current access corridors.

## Mitigation:

- OF-M Noise 1. The timing of construction should be limited to Monday-Friday from 7 am to 5 pm and prohibited on federal holidays. Advance warning of the timing of construction should be provided. Short-term noise impacts from construction can be decreased by shielding stationary construction equipment to reduce noise. Construction hours should be restricted to daylight hours during the week.
- **OF-M Noise 2.** Long-term noise impacts from operational use of the alternative can be decreased through the use of rubberized asphalt of the road through the dunes and paving of the road past Oso Flaco Lake.

#### Residual Impacts:

The residual noise impact to recreational users of the Oso Flaco Lake natural area would be significant.

## **Little Oso Flaco Lake:**

## **Existing Conditions:**

The Little Oso Flaco Lake Alternative is reached by turning west onto Oso Flaco Lake Road from Highway 1. Between Highway 1 and the turnoff to Little Oso Flaco Lake, Oso Flaco Lake Road passes through agricultural fields. Other than agricultural vehicles and equipment operations, this is a quiet rural area.

## Required Infrastructure:

Construction of this alternative would require widening the roads through the agricultural fields on both sides of Little Oso Flaco Lake and of the road across the lake, constructing a road through the dunes from the agricultural field on the north side of the lake to the beach, and possibly widening Oso Flaco Lake Road. Entrance kiosks, restrooms, and other infrastructure relating to a new park entrance would also be required.

## Impacts:

- **LOF-I Noise 1.** Widening Oso Flaco Lake Road and paving the agricultural road to and across Little Oso Flaco Lake would increase noise levels along the roads. No impacts are expected as there are no sensitive receptors present.
- **LOF-I Noise 2.** Visitors at the Oso Flaco Lake Natural Area would not be significantly impacted by the traffic noise due to the distance between the two areas.
- LOF-I Noise 3. Noise levels where the alternative reaches the beach are not expected to be greater than those resulting from continued use of the current access corridors. Significant levels of noise are expected before visitors reach the beach

## Mitigation:

- **LOF-M Noise 1.** The timing of construction should be limited to Monday-Friday from 7 am to 5 pm and prohibited on federal holidays. Advance warning of the timing of construction should be provided. Short-term noise impacts from construction activities can be mitigated by shielding stationary construction equipment to reduce noise.
- LOF-M Noise 2. Long-term impacts from use of the alternative can be mitigated by using rubberized asphalt when paving the road past the agricultural fields and when constructing the road from Little Oso Flaco Lake to the beach.

## Residual Impacts:

The residual noise impact would be insignificant.

## G. Equestrian Access and Impact Assessment

Equestrian access to and within the Oceano Dunes SVRA is currently provided in the northerly portion of the SVRA. The adjacent stables at Pacific Dunes Ranch offers guided

horse rides that use the SVRA; and, in addition, individual equestrians access the park in the vicinity of the Guiton Crossing and from Grand Avenue. They typically take the trail along Arroyo Grande Creek from the end of the south levee to the Pismo Dunes Preserve and then turn south, entering the beach south of the mouth of Arroyo Grande Creek. Equestrians also park and unload horse trailers at the Grand Avenue beach parking lot and access the beach from that entrance. Individual equestrians and groups of equestrians are often seen riding on the beach and on the Arroyo Grande Creek levees (Photos 40 and 41).



**Photo 48:** Horseback riding on the beach near Arroyo Grande Creek. February 2005. *Photo by Elihu Gevirtz*.

Some members of the public are concerned about the potential for water pollution in

Arroyo Grande Creek as a result of horse excrement being dropped in and/or near the creek, and as a result of horses' hooves increasing siltation and turbidity by disturbing the creek bottom when they walk through the creek at Guiton Crossing. The scope of this study includes an evaluation of the feasibility of alternative equestrian routes that would avoid crossing the stream. Potential water quality impacts are addressed in the impact analysis section of this report. The evaluation of alternative equestrian routes is discussed here.



**Photo 49:** Equestrians crossing Arroyo Grande Creek at Guiton Crossing. August 1, 2005. *Photo by: Jennifer Jackson.* 

The SVRA was examined via the aerial photography

as well as ground surveys for alternative equestrian routes. None were found however. The northerly alternatives (except for the existing access from the north and south levees as well as Pier and Grand Avenues), would necessitate the horses traveling through steep, loose sand dunes in order to get to the beach. This type of travel is generally not favored by horses (K. Chapman *pers. comm.* 2006).

The southerly routes would necessitate travel through steep, loose sand dunes, as well as the nesting area for western snowy plover and California least tern. The southerly alternatives would also necessitate mixing the two recreational activities: OHVs and equestrians. Since many horses are easily spooked, these southerly alternatives do not appear to be feasible and would not be favored by equestrians (K. Chapman *pers. comm.* 2006). Furthermore, the Coastal Commission eliminated equestrian access over the Oso Flaco causeway or in the vicinity of the Oso Flaco Lakes in 1991 via CDP 4-82-300-A4

(California Coastal Commission 2001). Thus, Condor concludes that there are no feasible alternatives for equestrian access.

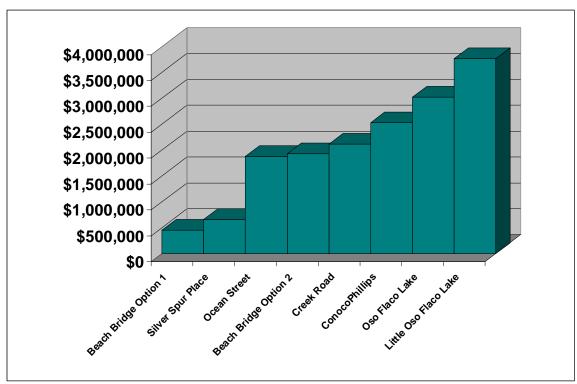
## H. Engineering and Cost

Preliminary cost estimates to engineer and construct each of the alternatives are summarized in Table 8, and Chart 4, and are provided in further detail in Appendix 6.

Table 8
Estimated Construction Costs

Access Alternative	Construction Cost	Design & Administration	Total	
Beach Bridge Option 1	\$411,950	\$43,255	\$455,205	
Silver Spur Place	\$515,857	\$144,440	\$660,297	
Ocean Street	\$1,463,206	\$409,698	\$1,872,904	
Beach Bridge Option 2	\$1,747,138	\$183,450	\$1,930,588	
Creek Road	\$1,652,212	\$462,619	\$2,114,831	
ConocoPhillips	\$1,974,605	\$552,889	\$2,527,494	
Oso Flaco Lake	\$2,360,215	\$660,860	\$3,021,075	
Little Oso Flaco Lake	\$2,942,281	\$823,839	\$3,766,119	

Chart 4
Estimated Construction Costs\*



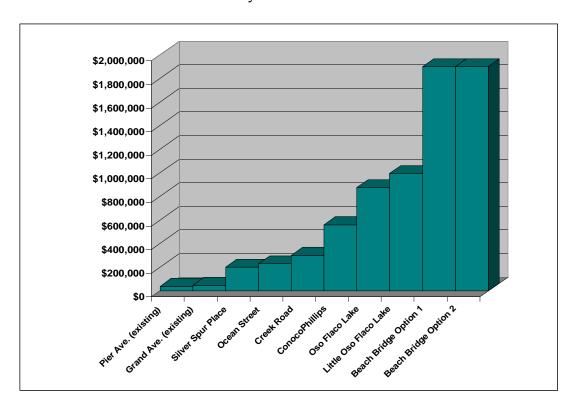
<sup>\*</sup>Includes design and administration costs.

Table 9
Estimated Maintenance Costs

Access Alternative	20-yr Total Maintenance Cost*	Average Annual Maintenance Cost*		
Pier Ave. (existing)	\$39,000	\$2,000		
Grand Ave. (existing)	\$47,000	\$3,000		
Silver Spur Place	\$203,000	\$11,000		
Ocean Street	\$230,000	\$12,000		
Creek Road	\$303,000	\$16,000		
ConocoPhillips	\$562,000	\$29,000		
Oso Flaco Lake	\$876,000	\$44,000		
Little Oso Flaco Lake	\$995,000	\$50,000		
Beach Bridge Option 1	\$1,900,273	\$70,720		
Beach Bridge Option 2	\$1,900,273	\$70,720		

<sup>\*</sup>Please see Appendix 6 for details and assumptions.

Chart 5
Estimated 20-year Maintenance Costs



## VII. POLICY CONSISTENCY ANALYSIS

## A. Introduction

California State Parks is governed by state and federal laws including the state and federal Endangered Species Acts, the California Coastal Act, the California Environmental Quality Act, State Parks Unit General Plan (California Department of Parks and Recreation 1975), the Department Operations Manual (California Department of Parks and Recreation 2004), and others. In addition, the Habitat Conservation Plan currently being drafted by California State Parks will apply to the State Park. Local laws do not apply to California State Parks or other state agencies, with the exception of sections of the law where the state legislature has designated the state's authority to local agencies. This is the case in the Coastal Zone of San Luis Obispo County, where the County's Local Coastal Plan (LCP) governs land use, including state-owned land such as Oceano Dunes SVRA. The California Coastal Commission still retains permit jurisdiction. The SVRA's Coastal Development Permit (most recently amended in 2003) from the Coastal Commission prescribes the conditions under which Oceano Dunes SVRA operates. The following discussion considers only those policies that pertain to the resources within the SVRA and the Pismo Dunes Natural Preserve.

## Existing Entrances (Grand Avenue and Pier Avenue):

Since the Grand Avenue and Pier Avenue access corridors are already in use and are governed by the existing Coastal Development Permit, no further policy discussion is provided.

## **Proposed Access Alternatives**

## Railroad Street, Ocean Street, and Silver Spur Place:

Policies that pertain to the Railroad Street alternative consist of policies regarding sensitive habitats, agriculture, shoreline access, and utilities.

LCP Environmentally Sensitive Habitat Policies 20, 21, and 26 pertain to coastal streams and riparian vegetation. LCP Policies 20 and 21 require construction of the Railroad Street corridor on the levees along Arroyo Grande Creek and construction of a bridge to avoid impacts to the creek including runoff and erosion. Conditions could be placed on the project that would achieve consistency with Policies 20 and 21. Policy 26 prohibits cutting or altering vegetation that protects riparian habitat, but permits minor incidental public works projects including roads where no feasible alternative exists. The Railroad Street Alternative's consistency with Policy 26 could be interpreted as consistent or inconsistent depending upon the view of "minor" and "feasible". The Coastal Commission may view the levee widening as major, not minor, and the retention of the two existing access corridors (Grand and Pier Avenues) as feasible. In that case, the alternative would be inconsistent with this policy.

LCP Agricultural Policy 1 requires that agricultural lands be maintained unless continued agricultural use is not feasible. Development of this corridor would require use and widening of a small, unpaved road that is adjacent to an agricultural field at the end of Creek Road. The relatively small amount of agricultural land that would be removed by this alternative (less than one acre) could still be interpreted as being inconsistent with the policy given the "black and white" nature of the policy's wording.

Airport Land Use Plan Utilities Condition 1 states that power lines "should be undergrounded if of sufficient height and placement as to cause a hazard to aircraft." Part of this corridor runs along the north levee adjacent to the Oceano Airport. In order to ensure compatibility with the Airport Land Use Plan, any power lines leading to the new park infrastructure would have to be undergrounded or routed so as to avoid areas where they could become an obstacle to aviation.

LCP Shoreline Access Policy 10 requires the protection of privacy and property rights of property owners along access corridors. In order to be consistent with this LCP policy, this access corridor would be designed with vegetative screening and possibly other measures in order to have minimal impact on the existing residences along Creek Road and the south levee, as well as any other private property along the corridor.

LCP Archaeological Policy 1 requires the protection of known and potential archaeological resources. The 200-foot wide Area of Potential Effect along this access corridor intersects with a known cultural resource site identified as SLO-189-1967. In addition, there are four other identified cultural resource sites proximal to the proposed alternative, but not within the impact zone (SLO-190-1967, SLO-191-1967, SLO-192-1967, and SLO-454). One of these four additional sites is unconfirmed. Data are not available as to the specific cultural resources present at these sites. This corridor cannot be rerouted to mitigate the impact at the intersection; and therefore this alternative would be inconsistent with this policy.

South County Planning Area Land Use Element and Local Coastal Plan (SCLCP) Recreation Standard 12 requires the fencing of known cultural resource sites. In the case of SLO-189-1967 this is not possible because the impact zone of the access corridor directly intersects with a known site. Impact to the proximal sites can be mitigated by fencing the corridor. Nevertheless, the alternative would be inconsistent with this standard.

Department Operations Manual Policy 0306.4 requires avoidance of adverse impacts to stream features and mandates consideration of relocation or redesign of facilities. Although construction of the bridge at the Guiton Crossing would minimize impacts to the stream, impacts to stream features downstream of the bridge would still occur as a result of the road being constructed through the riparian forest of Arroyo Grande Creek.

Department Operations Manual Policy 0310.1.1 requires preservation of natural biodiversity and protection of state and federally listed plants and communities. Construction of the road through the Dunes Preserve would be likely to adversely impact native biodiversity and several listed plants and communities.

Department Operations Manual Policy 0311.6.1.1 requires restoration and protection of anadromous streams for native anadromous fish including steelhead. Although

construction of the bridge at the Guiton Crossing would minimize impacts to steelhead, impacts to stream features (and therefore steelhead) downstream of the bridge would still occur as a result of the road being constructed through the riparian forest of Arroyo Grande Creek.

Department Operations Manual Policy 0312.2 requires avoidance or minimization to scenic resources. Construction of the road through the Dunes Preserve would be inconsistent with this policy.

Department Operations Manual Policy 0312.3 and 0312.4.1 requires protection of natural darkness at night and natural soundscapes. Construction of the road through the Dunes Preserve would be inconsistent with these policies as it would introduce night time light and nearly constant noise to the Preserve.

Department Operations Manual Policy 0304.2.5 requires Natural Preserves to be managed to allow natural dynamics of ecological interaction to continue without interference. Construction of the road through the Preserve would interrupt ecological interactions.

The purpose of the Pismo Dunes Natural Preserve as described in the General Plan is to perpetuate the natural condition of the sand dunes, to fully protect archaeological sites in the unit and to all natural vegetation and wildlife. It specifically prohibits roads in the Preserve. Construction of the road through the Preserve would be inconsistent with the General Plan and would require a General Plan Amendment approved by the State Park and Recreation Commission that would remove the designation of Natural Preserve.

#### Ocean Street:

The policy consistency analysis that pertains to the Ocean Street access corridor is equivalent to the analysis for the Railroad Street Alternative, with the exception that LCP Agricultural Policy 1 does not apply to the Ocean Street corridor since it does not impact any agricultural land.

## **Beach Bridge Options:**

Local Coastal Plan Environmentally Sensitive Habitat Policies 1, 2, 7, and 15 require protection of wetlands, avoidance of a significant disruption of the resource, demonstration of no significant impact on sensitive habitats, prohibition of vehicle traffic in wetlands. (Actions necessary to accomplish a permitted use within the wetland are allowed. In this case, vehicles driving across the mouth of Arroyo Grande Creek is permitted as part of the Coastal Development Permit.) Beach Bridge Option 1 would probably result in less vehicles be driven through the stream at the beach; however, it would require operations and maintenance heavy equipment to drive through the stream several times per day and season to accommodate the changing tides and stream location. Beach Bridge Option 2 would probably have the same impact. Both options would be inconsistent with these policies, although they may be considered less inconsistent than the existing permitted use.

Local Coastal Plan Environmentally Sensitive Habitat Policy 21 requires prevention of impacts that would significantly degrade coastal habitat and requires that it must be

compatible with the continuance of such habitat areas. The installation of concrete piles into the beach may alter sand movement and the wetland on the beach. This would be inconsistent with this policy.

Department Operations Manual Policy 0306.91 requires protection of surface water. Both of the beach bridge options are likely to improve protection of surface water of Arroyo Grande Creek when compared to the existing setting of vehicles driving through the stream. Although it would not result in a complete elimination of this condition, fewer vehicles would drive through the stream. Therefore, these options may be consistent with this policy.

Local Coastal Plan Visual and Scenic Resources Policy 10 prohibits new development on sandy beaches in order to minimize alterations to natural landforms, except facilities required for public health and safety. Department Operations Manual Policy 0312.2 requires avoidance or minimization of modifications to scenic resources. Beach Bridge Option 2 would consist of permanent concrete piles on the beach. By itself, this option would be inconsistent with these policies except that it could be argued that the bridge could improve public safety for drivers of vehicles across the stream. However, in the context of the existing setting which does not include structures on the beach, but does include hundreds and at times thousands of vehicles on the beach, a bridge could be considered consistent with this policy.

## ConocoPhillips:

The ConocoPhillips alternative is most strongly affected by policies affecting construction on and around dunes. These policies apply to all of the alternative corridors, but as the majority of the ConocoPhillips corridor passes through dunes, it is affected more strongly than the other corridors.

LCP Environmentally Sensitive Habitat Policies 29, 30, and 35 protect terrestrial habitats, native vegetation, and rare or endangered vegetation or vegetation that shelters endangered wildlife respectively. All of these are found in the dunes through which this corridor passes. The large amount of dune habitat that would be permanently removed and the adjacent habitat areas that would be continuously impacted by ongoing operation of the access corridor would render the alternative inconsistent with these policies.

LCP Environmentally Sensitive Habitat Policy 36 is specific to protection of dune vegetation and prohibits disturbance or destruction of dune habitat. Since construction of this corridor would destroy dune vegetation, this corridor is not consistent with this policy.

LCP Visual and Scenic Resources Policy 10 limits development on dunes to resource dependant uses. As riding on the dunes is resource dependent, this corridor is consistent with this policy.

LCP Archaeological Policy 1 requires the protection of known and potential archaeological resources. The 50-foot Area of Potential Effect along this access corridor intersects with a potential cultural resource site identified in NOAA aerial data. More than 90% of these

potential sites have been visited by State Parks staff and identified as not showing evidence of cultural resources on the surface, but this does not constitute a positive identification of no impact. Data are not available to adequately describe the specific cultural resources present at these sites. This corridor may be rerouted to mitigate impact.

SCLP Recreation Standard 12 requires the fencing of known cultural resource sites. Impact to the proximal sites can be mitigated by moving and fencing the length of the proposed corridor. The corridor could be consistent with this standard with implementation of fencing and shifting the corridor to avoid the archaeological site.

Department Operations Manual Policy 0306.7 requires prevention of destruction or degradation of wetlands and Policy 0310.9.1 requires protection of surface water. Road construction and operation could degrade Jack Lake and Lettuce Lake.

Department Operations Manual Policies 0310.1.1 and 0311.2 requires preservation of natural biodiversity, protection of state and federally listed plants and communities, and preservation of functional habitat linkages. Construction of the road through the ConocoPhillips property would be likely to reduce native biodiversity and negatively impact several listed plant and animal species and communities, destroy several individuals of Nipomo Mesa Lupine, impact California red-legged frog, and negatively impact other listed plants and communities.

Department Operations Manual Policy 0312.2 requires avoidance or minimization to scenic resources. Construction of the road through the ConocoPhillips property would be inconsistent with this policy.

Department Operations Manual Policy 0312.3 and 0312.4.1 requires protection of natural darkness at night and natural soundscapes. Construction of the road through the Oso Flaco Lake Natural Area would be inconsistent with these policies.

#### Oso Flaco Lake:

Policies affecting this access corridor relate to sensitive habitats and to Oso Flaco Lake specifically.

Oso Flaco Lake and the Dune Lakes are listed in the County of San Luis Obispo Coastal Plan Policies as being among the primary wetland areas in the county. As such, policies affecting wetlands will affect this corridor, including LCP Environmentally Sensitive Habitat Policies 7 and 15.

Policy 7 states that wetlands are environmentally sensitive habitats and requires that they be protected and preserved. Policy 15 prohibits vehicle traffic in wetlands. Constructing this access corridor would not be consistent with these policies as it would require widening of a road that runs adjacent to Oso Flaco Lake and would require vehicles entering and exiting the park to drive next to the lake, through the wetland area.

SCLCP Combining Designations Program 8 is specific to the Oso Flaco Lakes. This program prohibits OHV use in the area adjacent to the lakes. The routing of the access

road through the Oso Flaco Natural Area would be considered an expansion of the OHV area and would therefore be inconsistent with this policy.

LCP Archaeological Policy 1 requires the protection of known and potential archaeological resources. A 50-foot Area of Potential Effect along this access corridor intersects with a known cultural resource site identified as Nancy's Nook. Data are not available as to the specific cultural resources present at this site. This corridor cannot be rerouted to mitigate impact at the intersection and it would be inconsistent with this policy.

SCLP Recreation Standard 12 requires the fencing of known cultural resource sites. Impact to the proximal sites can be mitigated by moving and fencing the length of the proposed corridor. In the case of the Nancy's Nook site this is not possible because the impact zone of the access corridor directly intersects with a known site and it would be inconsistent with this standard.

Department Operations Manual Policy 0306.7 requires prevention of destruction or degradation of wetlands and Policy 0310.9.1 requires protection of surface water. Widening of the road in Oso Flaco Lake Natural Area would degrade this wetland.

Department Operations Manual Policies 0310.1.1 and 0311.2 requires preservation of natural biodiversity, protection of state and federally listed plants and communities, and preservation of functional habitat linkages. Construction of the road through the Oso Flaco Natural Area would be likely to reduce native biodiversity and negatively impact several listed plant and animal species and communities.

Department Operations Manual Policy 0312.2 requires avoidance or minimization to scenic resources. Construction of the road through the Oso Flaco Lake Natural Area would be inconsistent with this policy.

Department Operations Manual Policy 0312.3 and 0312.4.1 requires protection of natural darkness at night and natural soundscapes. Construction of the road through the Oso Flaco Lake Natural Area would be inconsistent with these policies.

## Little Oso Flaco Lake:

The policies affecting the Little Oso Flaco Lake access corridor and the policy consistency analysis are the same as those pertaining to the Oso Flaco Lake Road corridor. One additional policy pertains to the Little Oso Flaco Lake corridor which is LCP Agriculture Policy 1 that requires protection of prime agricultural land. This alternative would remove approximately 3.5 acres of prime land and would therefore be inconsistent with this policy.

#### All Proposed Alternatives:

There are several policies that affect all of the proposed alternatives equally. Most of these policies govern shoreline access. LCP Shoreline Access Policy 1 requires that existing shoreline access be protected and that development not interfere with access where it has been acquired through historic use or legislative authorization. This indicates that use of the existing access corridors should be allowed to continue even if a new corridor is

created. LCP Shoreline Access Policy 3 requires that when shoreline access is acquired, purchase in fee should be used only if no other option is available. To be consistent with this policy, the required acquisition method for each alternative must be determined and priority given to those corridors with less costly alternatives.

LCP Shoreline Access Policies 4, 6, and 7 also apply to all of the proposed access corridors. Policy 4 requires the provision of support facilities necessary for public access. These facilities are planned for the alternative corridors, so all of the corridors are consistent with this policy. Policy 6 requires that shoreline access be consistent with public safety. Policy 7 requires uniform signs to assist in locating and recognizing access points and indicating restrictions on access to sensitive habitats. The existing corridors are consistent with these policies, and the proposed alternatives can be designed to be consistent with these policies.

Several LCP Environmentally Sensitive Habitats (ESH) Policies apply to all of the proposed alternative corridors. ESH Policy 1 requires that new development in or adjacent to environmentally sensitive habitat not significantly disrupt the habitat. To be consistent with this policy, construction of a new corridor would have to be planned so that it does not pass through or negatively impact any sensitive habitats. Policy 29 protects terrestrial habitats. To be consistent with this policy, a new access corridor would have to be designed so as to avoid sensitive terrestrial habitat areas. Policies 30, 35, and 36 protect native vegetation, rare or endangered vegetation, and dune vegetation respectively. Due to the significant alternation to Environmentally Sensitive Habitat that each of the alternative corridors would have, all of the alternatives are inconsistent with these policies.

LCP Hazards Policy 2 requires that structural stability of new development be ensured and that there be no contribution to erosion. This is a concern for the sections of the proposed corridors that pass through unstable dune areas. It may not be possible to ensure the long-term stability of roads constructed through the dunes. Erosion may also be a concern where roads are added in stabilized dune areas, as this would likely require the removal of stabilizing vegetation. All of the alternative corridors would be inconsistent with this policy because they would all be routed through relatively unstable dunes.

LCP Visual and Scenic Resources Policy 10 prohibits new development on open sandy beaches and limits development on dunes to resource dependent uses. New development would not occur on sandy beach as part of any of the alternatives, but development of a kiosk and restrooms on the dunes may be required, and all of them would require construction of a road through the dunes. Therefore, they are not consistent with this policy.

Oceano Specific Plan Standard 3 requires that pollution control devices be installed in parking lots and other areas where fuel and other pollutants accumulate. If a parking lot is constructed as part of any of the corridors, pollution control devices would have to be installed to ensure consistency with this policy.

South County Planning Area Land Use Element and Local Coastal Recreation Standard 7 requires that alternative camping areas allow for adequate environmental protection of the dunes. It appears feasible to design and construct new camping areas (though none are proposed) consistent with this policy.

## All Access Corridors:

SCLCP Recreation Standards 5, 6 and 8. Standard 5 requires that all access points to the park be controlled. All of the corridors could be made consistent with this standard. Standard 6 requires noise control for OHVs in proximity to natural preserve areas. All of the corridors are equal in their consistency with this policy. There are limits on OHV use in place, and adding a new access corridor is not expected to change them. Standard 8 requires that natural buffers around sensitive areas be fenced. This is already being done, and is not expected to change if a new corridor is constructed. The corridors would all be consistent with this standard.

## VIII. CONCLUSIONS AND RECOMMENDATIONS

## A. Comparative Ranking of Policy Consistency

Appendix 9 provides a table that ranks the policy consistency of each of the alternatives from 1 to 5, with 1 being the most consistent with policy, and 5 being the least consistent with policy.

# B. Comparative Ranking of Corridor Sensitivity

In order to facilitate the decision making process, the following table has been created that ranks the environmental and policy consistency of each of the alternatives.

Table 10 Comparative Ranking of Corridor Sensitivity\*

Alternative Access Corridor	Biology	Archaeology	Visual	Traffic & Air Quality	Noise	Hydrology & Water Quality	Policy Consistency*	Total
Grand Ave	1	1	1	1	1	1	1.35	7.35
Pier Ave	1	1	1	1	1	1	1.35	7.35
Ocean Street	5	4	4	4	1	5	2.92	25.92
Creek Road	5	4	4	4	1	5	2.92	25.92
Silver Spur Place	5	4	4	4	1	5	3.10	26.10
ConocoPhillips	5	3	3	2	1	3	2.69	19.69
Oso Flaco Lake	5	2	5	4	5	5	3.27	29.27
Little Oso Flaco Lake	5	2	3	4	1	5	3.23	23.23

Note: 1 represents the lowest sensitivity, and 5 represents the highest sensitivity

\*Source: Appendix 9

Table 11 Comparative Ranking of Corridor Sensitivity From Lowest to Highest Sensitivity

Alternative Access Corridor	Biology	Archaeology	Visual	Traffic & Air Quality	Noise	Hydrology & Water Quality	Policy Consistency*	Total
Grand Ave	1	1	1	1	1	1	1.35	7.35
Pier Ave	1	1	1	1	1	1	1.35	7.35
ConocoPhillips	5	3	3	2	1	3	2.69	19.69
Little Oso Flaco Lake	5	2	3	4	1	5	3.23	23.23
Creek Road	5	4	4	4	1	5	2.92	25.92
Ocean Street	5	4	4	4	1	5	2.92	25.92
Silver Spur Place	5	4	4	4	1	5	3.10	26.10
Oso Flaco Lake	5	2	5	4	5	5	3.27	29.27

Note: 1 represents the lowest sensitivity, and 5 represents the highest sensitivity

\*Source: Appendix 9

## C. Summary

The existing access roads: Grand Avenue and Pier Avenue constitute the environmentally superior alternative. Nevertheless, implementation of the recommendations would be beneficial to the resources and visitors of the Park.

## D. Required Permits

Several permits will be required for implementation of any alternative. A list of agencies that may require permits to be issued are listed on page 212 in Table 12. It is very important to speak or meet with agency representatives prior to beginning the application process to determine the type of permit required.

Table 12 Permitting Agencies and Contact Details

Agency	Permit	Required Prior to	Contact	Phone
San Luis Obispo		Modification of Arroyo	Dean Benedicts	(805) 781-5267
Country Flood Control	To be determined	Grande Creek Levees	George Gibson	(805) 781-4469
	Water Quality Certification in association with Sections 401 Clean Water Act	Dredge and fill activites, in association with Army Corps of Engineers Permit	Central Coast, San Luis Obispo Office	(805) 549-3147
California Regional Water Quality Control Board-Region 3	Stormwater Permit	Construction activities including clearing, grading, and disturbances to the ground such as stockpiling, or excavation (does not include maintenance activities) where the project area exceeds 1 acre.	Donette Dunaway	(805) 549-3698
San Luis Obispo County Planning and Building	Grading permits, building permits, property zoning and uses, and land use permits	Grading, building, land use alteration	Planning and Building Office	(805) 781-5600
Caltrans	Encroachment Permits	Modifying flow of traffic on and off Hwy 1 and construction of signaled intersection	District 5	(805) 549-3111
	Rail Crossing Permit(s)	Modification of railroad crossings	Division of Rail- Clem Bomar	(916) 653-1105
California Coastal Commission	Coastal Development Permit	Modification of CDP	Charles Lester	(831) 427-4863
U.S. Army Corps of Engineers	Permits in association with Sections 401 and 404 of the Clean Water Act and Section 10 of the	Activities affecting wetlands, levees, navigable waters, stormwater management	San Francisco Regulatory District	(415) 977-8461
	Rivers and Harbors Act	Stoffiwater management	General Information	(415) 977-8436
	Section 1600 Agreement	Lake and streambed alterations	Central Coast Regional Office-Regulations	(707) 944-5521
California Department of Fish and Game	California Endangered Species Act (CESA)	Activities affecting threatened and endangered species	Habitat Conservation Planning Branch	(916) 653-4875
U.S. Fish and Wildlife Service	Endangered Species Act (ESA) Section 10- (Incidental Take Permit)	Activities affecting plants and animals designated as threatened or endangered and the habitats upon which they depend	Region 1-Pacific Region	(503) 231-2071
National Oceanic and Atmospheric Administration	Endangered Species Act (ESA)-Section 10(a)(1)(B) permit (Incidental Take Permit)	Activity where a listed species may be adversely affected, and the purpose of activity is not scientific research on or enhancement of listed species	National Marine Fisheries Service	(707) 575-6050
Public Utilities Commission	Rail Crossing Permit(s)	Modification of railroad crossings	Vahak Petrossian	(213) 576-7000
Union Pacific Railroad	Rail Crossing Permit(s)	Modification of railroad crossings	Dave Peterson	(402) 271-5891

## E. Recommendations

- 1. Retain the two existing access roads rather than construct a new road to the beach.
- 2. Conduct a census several times per year to determine how many vehicles are driven south of Arroyo Grande Creek. Compare these number to the total number of vehicles that enter the park in order arrive at a ratio of vehicles driven south of the creek to total vehicles admitted to the SVRA. Also census the number of visitors who enter the SVRA by walking and riding horses.
- 3. Consider placement of a convenience store on the beach south of the creek in order to decrease the number of multiple trips in and out of the park.
- 4. Develop a horse waste management plan for the SVRA.
- 5. Develop a management plan for the Oso Flaco Lake Natural Area.
- 6. Develop a wetland restoration plan for leased agricultural land within the SVRA near Oso Flaco Lake and Little Oso Flaco Lake.
- 7. Prepare a vegetation map of the SVRA.
- 8. Continually update the GIS as new locations of sensitive species and archaeological sites are identified. Use the GIS to track weeds and weed eradication efforts, and to evaluate potential impacts of future projects.
- 9. Incorporate the data that have been gathered by Blecha, Cleveland, and Innis into the GIS created by Condor for the SVRA.
- 10. Develop and implement a weed eradication plan for the most troublesome of non-native plants including European beach grass, pampas grass, and purple veldt grass.
- 11. Work with local farmers, homeowners, the County, the Regional Water Quality Control Board, and the Regional Conservation District to improve water quality in Arroyo Grande Creek, Meadow Creek, Los Berros Creek, Oso Flaco Creek, Oso Flaco Lake and Little Oso Flaco Lake.

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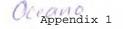
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# Appendices



	Scientific Name/Common Name	Element Code	Federal Status	State Status	GRank	SRank	CDFG or CNPS/R-E-D
1	Arenaria paludicola marsh sandwort	PDCAR040L0	Endangered	Endangered	G1	S1.1	1B/3-3-2
2	Charadrius alexandrinus nivosus western snowy plover	ABNNB03031	Threatened		G4T3	S2	sc
3	Cirsium Ioncholepis La Graciosa thistle	PDAST2E1N0	Endangered	Threatened	G2	S2.2	1B/3-3-3
4	Cirsium rhothophilum Surf thistle	PDAST2E2J0		Threatened	G2	S2.2	1B/2-2-3
5	Clarkia speciosa ssp. immaculata Pismo clarkia	PDONA05111	Endangered	Rare	G4T1	S1.1	1B/3-3-3
6	Dithyrea maritima beach spectaclepod	PDBRA10020		Threatened	G2	S2.1	1B/3-3-2
7	Lupinus nipomensis Nipomo Mesa lupine	PDFAB2B111	Endangered	Endangered	G1	S1.1	1B/3-3-3
8	Oncorhynchus mykiss irideus steelhead - south/central California coast esu	AFCHA0209H	Threatened		G5T2	S2	
9	Rana aurora draytonii California red-legged frog	AAABH01022	Threatened		G4T2T3	S2S3	sc
10	Rorippa gambelii Gambel's water cress	PDBRA270V0	Endangered	Threatened	G1	S1.1	1B/3-3-2
11	Sterna antillarum browni California least tern	ABNNM08103	Endangered	Endangered	G4T2T3Q	S2S3	

Scientific Name	Common Name	Special Status
Abronia maritima	sticky sand-verbena	CNPS List 4
Abronia umbellata	beach sand-verbena	
Acer negundo var. californicum	box elder	
Achillea millefolium	yarrow	Nice
Agrostis viridis	water bent grass	None
Amaranthus sp.	pigweed	
Ambrosia chamissonis	silver beach weed, beach bur	
Ambrosia psilostachya	western ragweed	IP I AL AL A
Ammophila arenaria	European beachgrass	High; No Alert
Amsinckia menziesii ssp. intermedia	fiddleneck	
Amsinckia sp.	fiddleneck	Ness
Anagallis arvensis	scarlet pimpernel	None
Anthemis cotula	mayweed	None
Apium graveolens	celery	None
Artemisia californica	coastal sagebrush	
Artemisia douglasiana	mugwort	
Artemisia dracunculus	tarragon	TP-E
Arundo donax	giant reed	High
Aster sp.	N. a. III. I	ONIDO LI LA
Astragalus nuttallii var. nuttallii	Nuttall's locoweed	CNPS List 4
Atriplex triangularis	spear-scale	
Avena barbata	slender wild oats	
Baccharis douglasii	sticky baccharis	
Baccharis pilularis	coyote brush	
Brachypodium distachyon	false brome	None
Brassica nigra	black mustard	None
Brassica rapa	field mustard	None
Brassica tournefortii	Sahara mustard	High
Briza maxima	rattlesnake grass	None
Bromus carinatus	California brome	
Bromus catharticus	rescue grass	None
Bromus diandrus	ripgut brome	Moderate
Bromus hordeaceus	soft brome	None
Bromus madritensis ssp. rubens	red brome	High; No Alert
Cakile maritima	sea rocket	Low; No Alert
Calyptridium monandrum		
Calystegia macrostegia ssp. cyclostegia	coastal morning-glory	
Camissonia micrantha	sun cups	
Camissonia cheiranthifolia ssp. cheiranthifolia	beachprimrose	
Camissonia intermedia	sun cups	
Camissonia strigulosa		
Capsella bursa-pastoris	Shepherd's-purse	None
Cardamine oligosperma	bitter cress	
Cardaria draba	hoary cress	None
Cardionema ramosissimum	sandmat	
Carduus pycnocephalus	Italian thistle	Moderate
Carex sp.	sedge	
Carpobrotus chilensis	sea-fig	Medium; No Alert
Carpobrotus edulis	hottentot-fig	High; No Alert
Castilleja affinis	indian paintbrush	
Castilleja affinis ssp. affinis	indian paintbrush	
Castilleja densiflora	owl's clover	
Centaurea melitensis	tocalote	Moderate
Cerastium glomeratum	mouse-eared chickweed	None
Chaenactis glabriuscula var. lanosa	yellow pincushion	
Chamomilla suaveolens	pineapple weed	None
Chenopodium ambrosioides	Mexican tea	None
Chenopodium californicum	soap root	
Chenopodium murale	nettle-leaf goosefoot	None
Chenopodium sp.		
Chorizanthe angustifolia	narrowleaf spineflower	Endemic
Chrysanthemum coronarium	garland chrysanthemum	None
Cirsium californicum	California thistle	
Cirsium occidentale	western thistle	
	cobweb thistle	
Cirsium occidentale var. occidentale		Madione, Na Alant
Cirsium occidentale var. occidentale Cirsium vulgare	bull thistle	Medium; No Alert
Cirsium vulgare	bull thistle	Medium, No Alert
	bull thistle miner's lettuce	Medium; No Alert
Cirsium vulgare Claytonia parviflora ssp. parviflora		Medium; No Alert
Cirsium vulgare Claytonia parviflora ssp. parviflora Claytonia perfoliata ssp. mexicana Clematis ligusticifolia	miner's lettuce	Low; No Alert
Cirsium vulgare Claytonia parviflora ssp. parviflora Claytonia perfoliata ssp. mexicana	miner's lettuce creek clematis	

Scientific Name   Common Name   Special Status   Corryato porting and provided   None   Corryato provided   None   Corresponding Special   Correspondi			
Conzepsis galaritea glaint coreopsis Corestrogyne filiagnifolis Cudweed sater Corestrogyne filiagnifolis Cudweed sater Corderins sollowing and pumpas grass High: No Alart Condensisted Controllegisted Contro			
Corteopsis giganitea Cortedens selfoans Cortedens selfoans openses agrass Contral comments Cortedens selfoans openses agrass Cotula cortenpolite Cortedens selfoans Cotula cortenpolite Cortedens selfoans Cotula cortenpolite Cortedens openses Cortede			
Cordening inferiorial Cottracester paranosa			None
Contense selenanes coloneaster None Cotula australis Australian brass-buttons None Cotula australis Australian brass-buttons None Cotula cornonpiolia brass-buttons None Crassula connata plyro weed Crotula cornonpiolia Crassula connata plyro weed Crotula Cotula			
Cotula australas  Australan brass-buttons  None  Cotula ocoronopifolia  Corsus accoronata  pigmy weed  Croton californicus  Cojifornia croton  Cryptantha clevelandii  Common cryptantha  Costala coronopifolia  Cryptantha clevelandii  Common cryptantha  Costala spy  Costala coronopifolia  Cryptantha clevelandii  Common cryptantha  Costala cryptantha  Costala cryptantha  Costala cryptantha  Costala cryptantha  Costala cryptantha  Costala cryptantha  Coronomon c			High: No Alert
Cotula coronoptofia brass-buttons None Crassula coronata Crassula coronata Dipimy weed Croton californius Corptantha clevelandii Corptantha clevelandii Corono californius Corptantha clevelandii Corono californius Corptantha clevelandii Corono californius Corptantha clevelandii Corono californius Corptantha clevelandii Corono corono cryptantha Corono californius Corono cal			
Crassula connata Cyptantha clevelandii Corptantha clevelandii Corptantha clevelandii Corptantha clevelandii Coscuta sp. Colocuta sp. Condon dactylon Bermuda grass Moderate; No Alert Coperus sp. Deliarea odorata Deliarea odorata Deliarea odorata Deliarea odorata Deliarea odorata Descurainia pirinata Durileya caeseptiosa  Bait grass Durileya caeseptiosa Band-lettuce Epiribatu calaptian Epiribatu			
California croton Cryptantha leoicarpa Cryptantha leoicarpa Cosatal cryptantha Corptantha leoicarpa Condot dectylon Bermuda grass Moderate; No Alert Cyperus sp. Daucus pusillus Daucus pusillus Delprinarda [Hemizonia] increscens var. Increscens Deliarea dodorals Deliarea			
Corpotantha clevelandii Corpotantha (elicocarpa Couscula sp. Condon dectyfon Debruca sp. Deliver odorate Deliver odorate Deliver odorate Deliver odorate Deliver odorate Deliver odorate Descurania pinnata Deliver odorata Descurania pinnata Descurania pinnata Descurania pinnata Descurania pinnata Distechiis spicata Descurania pinnata Distechiis spicata Distechiis spicata Distechiis spicata Saltgrass Distechiis spicata Saltgrass Dudeya caespitosa Enitherate cabycina Enitherate cabycina Enitherate cabycina Enitherate cabycina Eniterate cabyci	Crassula connata	pigmy weed	
Conscular pa coastal cryptantha (conscular paper)  Cynodon dactyfon  Cynodon dactyfon  Cynerus sp.  Daucus pusillus  Iarweed  Delarinard offerinzonie) increscens var.  Increscens  Delarinard offerinzonie  Delarinard offerinzoni	Croton californicus		
Cuscuis sp. Cyperus sp. Cyperus sp. Deinandra [Hemizonia] increscens var. Increscens Delarize addrata Deinandra [Hemizonia] increscens var. Increscens Delarize addrata Descurabile pinnate Districtis spaceta Districtis spaceta Districtis spaceta Salt grass Dudleya caesoptosa Epinburu cileture Epinburu cileture Epinburu cileture Epinburu cileture Epinburu cileture Epinburu cileture Epinoturu cileture Eriopanur parvitolium Ericameria ericoides Eriogeno blochmaniae Ericameria ericoides Eriogenolium parvitolium seacidi daisy Ericopuru parvitolium Ericopuru cileturia Evinta seacidi daisy Ericopuru parvitolium Ericopuru cileturia Evinta seacidi daisy Evinta seacidi daisy Ericopuru cileturia Evinta seacidi daisy Evinta s			
Cynorto Sp.         Daucus pusillus         Moderate; No Alert           Daucus pusillus         rattlesnake weed           Delinandra [Hemizonie] Increscens var.         tarweed           Delarizo dodrata         German ivy. cape ivy         High; No Alert           Delphinum parishil ssp. blochmaniae         dune larkspur         CNPS List 1B/Endemic           Descurania pinnata         western tansy mustard         Dischessemma capitatur           Distchilis spicata         salt grass         Distchilis spicata           Distchilis spicata         salt grass         Distchilis spicata           Distchilis spicata         salt grass         Distchilis spicata           Durileya ceaspitosa         sand-lettuce         High, Alert           Eniferat calycina         purple veldt grass         High, Alert           Epilobibum ciliatur         willow herb         Prigeran foliatur           Equiseum telmateia ssp. braumia         giant horsetail         CNPS List 1B/Endemic           Erigeran blochmaniae         Blochman's leafy daisy         CNPS List 1B/Endemic           Erigeran blochmaniae         Blochman's leafy daisy         CNPS List 1B/Endemic           Eriophyllum confertillorum         specified velocity bit purple with pur			
Cyperus Sp.   Delarous pusilius   Delarous   Delarous pusilius   Delarous	Cuscuta sp.		N. I. d. N. Al. d.
Daucus pusilius   Deinandra   Hemizonia  increscens var.   Increscens   Increscen		Bermuda grass	Moderate; No Alert
Deinandra [Hemizonia] increscens var. increscens Delairea oxforats Delairea oxforats Delairea oxforats Despinitum parishii ssp. blochmaniae dune larkspur Descurainia prinata Dichelostemme capitatum. Dischelostemme capitatume. Dischelostemme capitatum. Dischelostemme capitatume. Dischelostemme capitatume. Dischelostemme capitatum. Dischelostemme capitatum		rottleaneke wood	
Increscens		Tallieshake weed	
Delaphinum parishit is sp. blochmaniae   dune larkspur   CNPS List 1B/Endemic		tarweed	
Delphinium parishii ssp. blochmaniae   dune larkspur   CNPS List 1B/Endemic   Dichelostermna capitatum:   blue dicks   Distoritis spicata   Salt grass   Salt grass   Salt grass   Salt grass   Dudleya caespitosa   Salt grass   Salt grass   Salt grass   Dudleya caespitosa   Salt grass   Salt grass   Dudleya caespitosa   Salt grass   Sand-lettuce   High, Alert   Epidobium ciliatum   Willow herb   Epidobium ciliatum   Willow herb   Epidobium ciliatum   Willow herb   Epidobium ciliatum   Willow herb   Ericaren fercicides   Michael and the spice of		German ivy cape ivy	High: No Alert
Descurating pinnata   Western Lansy mustard			
Dichelossemma capitatur   Diue dicks   Distichits spicata   Salt grass   Salt grass   Distichits spicata   Salt grass   Salt grass   Dudleya caespitosa   Sand-lettuce   Ethrarta calycina   Dudleya caespitosa   Dudleya caespitosa   Sand-lettuce   Ethrarta calycina   Dudleya caespitosa   Dudleya caespi			
Distichils spicates   Salt grass   Dudleya caespitosa   Saltgrass   Saltgrass   Dudleya caespitosa   Saltgrass   Sand-lettuce   Sand-lettuc			
Dudleya caespilosa   Sand-lettuce   Ehrharta calycina   purple veldt grass   High, Alert			
Ehrharta calycina	Distichlis spicata	saltgrass	
Epilobium ciliatum:   willow herb			
Equisetum telmateia asp. braunin   giant horsetail			High, Alert
Ericameria ericoides mock heather, heather goldenbush Erigeron blochmaniae Blochmaniae Blochmaniae Blochmaniae Blochmaniae Blochmaniae Blochmaniae Eriogeno foliosus leaty daisy Eriogonum parvifolium seacliff buckwheat Eriophyllum confertiflorum golden varrow Froothyllum staechadifolium: seaside woolly sunflower Eriophyllum staechadifolium: seaside woolly sunflower Eriodium botrys flaree, storksbill None Eriodium cicutarium golden varrow GNPS List 4/Endemic Erysimum insulare ssp. suffrutescens dune wallflower CNPS List 4/Endemic Erysimum insulare ssp. suffrutescens California poppy GNPS List 4/Endemic Erysimum insulare ssp. suffrutescens California poppy GNPS List 4/Endemic Eucalyptus globulus blue gum Moderate Euphorbia peplus Detty spurge None Euthamia occidentalis western goldenrod Filago californica California filago Filago galica Galifornica California filago Filago galica Galifornica California filago Filago galica Galium aparine Cleavers Galium alifornicum green everlasting Gnaphalium bicolor bicolored everlasting Gnaphalium bicolor Botrolored Gnaphalium purpureum purpue cudweed Gnaphalium stramineum House dune Gnaphalium stramineum purpueum Purp			
Erigeron blochmaniae   Elochman's leafy daisy   CNPS List 1B/Endemic   Erigeron foliosus   Leafy daisy   Seacilif buckwheat   Eriophyllum confertiflorum   seacilif buckwheat   Eriophyllum staechadfolium   seaside woolly sunflower   Serohyllum staechadfolium   Seaside woolly sunflower   None   Erodium botrys   flaree, storksbill   None   Erodium cicutarium   red-stem filaree, afferillo   Limited   Erysimum insulare ssp. suffrutescens   dune wallflower   CNPS List 4/Endemic   Eschscholzia californica   California poppy   Eucalyptus   dune wallflower   CNPS List 4/Endemic   Eschscholzia californica   California poppy   Eucalyptus   dune wallflower   None   Eurhamia occidentalis   western goldernod   Filago californica   California filago   None   Filago californica   California filago   None   Filago californica   Filago spallica		9	
Erigeron foliosus   leafy daisy   Eriogonum parvifolium:   seacilif buckwheat   Eriogonum parvifolium:   seacilif buckwheat   Eriophyllum staechadifolium:   seaside woolly sunflower   Erophyllum staechadifolium:   seaside woolly sunflower   Erodium botrys   filaree, storkshill   None   Erodium cicutarium   red-stem filaree, afilerillo   Limited   Limited   Erysimum insulare ssp. suffrutescens   dune walliflower   CNPS List 4/Endemic   Eschscholizia californica   California poppy   Eucalyptus globulus   blue gum   Moderate   Euphorbia peplus   petty spurge   None   Eucalyptus globulus   petty spurge   None   Euchyptus globulus   petty spurge   None   Eucalyptus globulus   Petty spurge   None   Eucalyptus globulus   Petty spurge   None   Filago californica   California filago   Filago californica   California filago   Filago californica   California filago   Filago filago   Petty spurge   Pett			
Eriognynum parvifolium	9		CNPS List 1B/Endemic
Eriophyllum confertiflorum Eriophyllum staechadifolium: Erodium botrys filaree, storksbill Rone Erodium cicutarium Erodium insulare ssp. suffrutescens Eschscholzia californica California poppy Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Eschscholzia californica California filago Euthamia occidentalis Euthamia occidentalis Eschscholzia californica California filago Euthamia occidentalis Euthamia occid			
Eriophyllum staechadifolium:  Erodium botrys  filaree, storksbill  None  Erodium cicutarium  red-stem filaree, afilerillo  Limited  Erysimum insulare ssp. suffrutescens  Eschscholzia californica  Eschscholzia californica  Eucalyptus globulus  blue gum  Moderate  Euphorbia peplus  Euthamia occidentalis  Filago californica  California filago  Filago gallica  Foenicultum vulgare  Fenenicultum vulgare  Fragaria chiloensis  Galium aparine  Galium aparine  Galium aparine  Galium bedstraw  Geranium dissectum  Cutleaf geranium  Limited  Gnaphalium bicolor  Gnaphalium luteo-album:  Gnaphalium purpureum:  Gnaphalium ramosissimum  purple cudweed  Gnaphalium stramineum:  Gnaphalium stramineum:  Graphalium stramineum:  Hedder a canariensis  Algerian ivy  Hedder a craniensis  None  None  None  Hedprois cretica  Crete weed  None  Heliotropiem curassavicum  Helenium puberulum:  Helerorate a fernel  None  None  Heleroration a fernel  None  Heleror			
Erodium botrys filaree, storksbill None Erodium cicutarium red-stem filaree, afilerillo Limited Erysimum insulare ssp. suffrutescens Eucalyptus globulus Eucalyptus globulus Eucalyptus globulus Euchorbia peptus Petty spurge None Euthamia occidentalis Filago californica California filago Filago californica California filago Filago californica California filago Filago californica Foeniculum vulgare Foeniculum vulgare Foeniculum vulgare Foeniculum vulgare Foeniculum vulgare Galium aparine California bedstraw California bedstraw Californicum spp. maritimum Californicum geren everlasting Geranium dissectum Gnaphalium bicolor Gnaphalium purpureum Gnaphalium purpureum Durple cudweed Gnaphalium purpureum Canaphalium purpureum Durple cudweed Gnaphalium purpureum Canaphalium stramineum Canaphalium stramineum Cotton-batting Hedera canariensis Algerian ivy None Hedera canariensis Algerian iva Algeri	. ,		
Erodium cicutarium			None
Erysimum insulare ssp. suffrutescens Eschscholzia californica Eschscholzia californica Eucalyptus globulus Euphorbia peplus Euphorbia peplus Euphorbia peplus Euphorbia peplus Euphorbia peplus Euphorbia peplus Euthamia occidentalis Euthamia occidentalis Filago californica California filago Filago gallica Filago gallica Filago gallica Filago gallica Finenel High; No Alert Fragaria chiloensis Galium vulgare Fragaria chiloensis California beach strawberry Galium californicum spp. maritimum California bedstraw Geranium dissectum Gulleaf geranium Gissectum Ganaphalium bicolor Ginaphalium bicolor Ginaphalium bicolor Ginaphalium diseo-album Ginaphalium purpureum Ginaphalium purpureum Ginaphalium purpureum purple cudweed Ginaphalium ramisissimum pink everlasting Ginaphalium stramineum Hedera canariensis Algerian ivy None Hedera canariensis Algerian ivy None Hedera canariensis Algerian ivy None Hedelnium puberulum Hedera canariensis Algerian ivy None Hedelnium puberulum sneezeweed Heliotropium curassavicum heliotropium curassa		,	
Eschscholzia californica  Eucalyptus globulus  Eucalyptus globulus  Euthamia occidentalis		,	14.1
Eucalyptus globulus         blue gum         Moderate           Euphorbia peplus         petty spurge         None           Euthamia occidentalis         western goldenrod           Filago californica         California filago           Filago gallica         None           Foeniculum vulgare         fennel         High; No Alert           Fragaria chiloensis         beach strawberry           Galium paprine         cleavers           Galium californicum spp. maritimum.         California bedstraw           Geranium dissectum         cutteaf geranium           Graphalium bicolor         bicolored everlasting           Gnaphalium bicolor         bicolored everlasting           Gnaphalium luteo-album         weedy cudweed           Gnaphalium purpureum         purple cudweed           Gnaphalium purpureum         purple cudweed           Gnaphalium stramineum         cotton-batting           Hedera canariensis         Algerian ivy         None           Hedera canariensis         Algerian ivy         None           Hedelphium puberulum         sneezeweed         None           Helenium puberulum         sneezeweed         None           Helsperocnide tenella         western nettle           Hesperocnide ten			
Euphorbia peplus petty spurge western goldenrod polithrania occidentalis western goldenrod polithrania occidentalis western goldenrod polithrania occidentalis western goldenrod polithrania filago pellica California filago None Foeniculum vulgare fennel High; No Alert Fragaria chiloensis beach strawberry Galium aparine cleavers Galium aparine cleavers Galium californicum spp. maritimum. California bedstraw Limited Graphalium bicolor bicolored everlasting Graphalium bicolor bicolored everlasting Graphalium californicum green everlasting Graphalium luteo-album. weedy cudweed Graphalium purpureum purple cudweed Graphalium ramosissimum prink everlasting Graphalium stramineum. Cotton-batting Hedera canariensis Algerian ivy None Hedypnois cretica Crete weed None Heliotropium curassavicum heliotrope Heliotropium curassavicum heliotrope Hersperocnide tenella western nettle Hetsperocnide tenella western nettle Hetsperocnide tenella western nettle Hetsperocnide tenella western nettle Hersperocnide tenella wedge-leaf horkelia unatard Moderate Hydrocotyle verticiliata whorled marsh pennywort Hypochaeris glabra smooth cats-ear Limited Hypochaeris radicata hairy cats-ear Limited	Eschscholzia californica	California poppy	
Filago californica California filago None Filago gallica Foeniculum vulgare fennel Fragaria chiloensis beach strawberry Calium aparine Cleavers Galium alifornicum spp. maritimum California bedstraw Geranium dissectum Cutleaf geranium Canaphalium bicolor Gnaphalium californicum Gnaphalium culto-album Gnaphalium purpureum Durple cudweed Gnaphalium stramineum Canaphalium stramineum Cotton-batting Hedera canariensis Algerian ivy None Hedelpnium puberulum Sneezeweed Heliotropium curassavicum Heliotropium curassavicum Heliotrope Hesperocnide tenella Western nettle Heterotheca grandiflora Helera grandiflora Helera grandiflora Helera murrinum Moderate Hordeum murinum Moderate Hydrocotyle verticillata Hydrocotyle verticillata Hair vats ear Limited Hypochaeris radicata Hairy cats-ear Limited Hairy California Helinited Hispochaeris radicata Hairy cats-ear Limited			Moderate
Filago gallica fennel High; No Alert Foeniculum vulgare fennel High; No Alert Fragaria chiloensis beach strawberry  Galium aparine cleavers  Galium californicum spp. maritimum. California bedstraw  Geranium dissectum cutleaf geranium Limited  Gnaphalium bicolor bicolored everlasting  Gnaphalium californicum green everlasting  Gnaphalium purpureum. purple cudweed  Gnaphalium purpureum. purple cudweed  Gnaphalium stramineum cotton-batting  Hedera canariensis Algerian ivy None  Hedypnois cretica Crete weed None  Helelnium puberulum. seezeweed  Heliotropium curassavicum heliotrope  Herniaria hirsuta ssp. cinerea leliotrope  Hesperocnide tenella western nettle  Heterotheca grandiffora telegraph weed  Horkelia cuneata ssp. cuneata sp. cuneata wedge-leaf horkelia  Hydrocotyle verticillata whorled marsh pennywort  Hypochaeris radicata  Hairy cats-ear  Limited  Limited  Himited	Eucalyptus globulus	blue gum	
Foeniculum vulgare fennel fennel High; No Alert Fragaria chiloensis beach strawberry Galium aparine cleavers Galium alifornicum spp. maritimum. Galium californicum spp. maritimum. Graphalium biscolor biscolored everlasting Gnaphalium biscolor green everlasting Gnaphalium nulteo-album. Gnaphalium purpureum. Gnaphalium purpureum. Gnaphalium ramosissimum Gnaphalium stramineum. Hedera canariensis Algerian ivy None Helenium puberulum. Heledropium curassavicum. Helenium puberulum. Heliotropium curassavicum. Heliotropium curassavicum. Heliotropium curassavicum. Hesperocnide tenella western nettle Heterotheca grandiflora telegraph weed Hordeum murinum. Moderate Limited Hypochaeris galabra Limited	Eucalyptus globulus Euphorbia peplus	blue gum petty spurge	
Fragaria chiloensis	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica	blue gum petty spurge western goldenrod	
Galium aparine       cleavers         Galium californicum spp. maritimum       California bedstraw         Geranium dissectum       cutleaf geranium       Limited         Gnaphalium bicolor       bicolored everlasting         Gnaphalium californicum       green everlasting         Gnaphalium luteo-album       weedy cudweed         Gnaphalium purpureum       purple cudweed         Gnaphalium stramineum       pink everlasting         Gnaphalium stramineum       cotton-batting         Hedera canariensis       Algerian ivy       None         Hedera canariensis       Algerian ivy       None         Helenium puberulum       sneezeweed       None         Heliotropium curassavicum       heliotrope         Herniaria hirsuta ssp. cinerea       Nene         Hesperocnide tenella       western nettle         Hesperocnide tenella       western nettle         Hirschfeldia incana       short-podded mustard       Moderate         Hirschfeldia incana       short-podded mustard       Moderate         Horkelia cuneata ssp. cuneata       wedge-leaf horkelia       Hydrocotyle verticillata         Hypochaeris glabra       smooth cats-ear       Limited         Hypochaeris radicata       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica	blue gum petty spurge western goldenrod California filago	None None
Galium californicum spp. maritimum.       California bedstraw         Geranium dissectum       cutleaf geranium       Limited         Gnaphalium bicolor       bicolored everlasting         Gnaphalium luteo-album.       green everlasting         Gnaphalium luteo-album.       weedy cudweed         Gnaphalium purpureum.       purple cudweed         Gnaphalium stramineum.       pink everlasting         Gnaphalium stramineum.       cotton-batting         Hedera canariensis       Algerian ivy       None         Hedrypnois cretica       Crete weed       None         Helenium puberulum.       sneezeweed       None         Heliotropium curassavicum.       heliotrope       None         Hermiaria hirsuta ssp. cinerea       None         Hesperocnide tenella       western nettle       None         Hesperocnide tenella       western nettle       Moderate         Hirschfeldia incana       short-podded mustard       Moderate         Hordeum murinum.       mouse barley, foxtail       Moderate         Hordeum murinum.       mouse barley, foxtail       Moderate         Hydrocotyle verticillata       whorled marsh pennyworl       Limited         Hypochaeris glabra       smooth cats-ear       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare	blue gum petty spurge western goldenrod California filago fennel	None None
Geranium dissectum         cutleaf geranium         Limited           Gnaphalium bicolor         bicolored everlasting         Gnaphalium californicum         green everlasting           Gnaphalium luteo-album         weedy cudweed         Gnaphalium purpureum         purple cudweed           Gnaphalium ramosissimum         pink everlasting         Gnaphalium stramineum         cotton-batting           Hedera canariensis         Algerian ivy         None           Hedypnois cretica         Crete weed         None           Helenium puberulum         sneezeweed         Heliotropium curassavicum           Heliotropium curassavicum         heliotrope         Hemiaria hirsuta ssp. cinerea         None           Hesperocnide tenella         western nettle         None         Hesperocnide tenella         Moderate           Hirschfeldia incana         short-podded mustard         Moderate         Moderate           Hordeum murinum         mouse barley, foxtail         Moderate           Hordeum murinum         wedge-leaf horkelia         Horderate           Hydrocotyle verticillata         whorled marsh pennyworl           Hypochaeris glabra         Limited           Hypochaeris radicata         Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis	blue gum petty spurge western goldenrod California filago  fennel beach strawberry	None None
Gnaphalium bicolor       bicolored everlasting         Gnaphalium californicum       green everlasting         Gnaphalium luteo-album       weedy cudweed         Gnaphalium purpureum       purple cudweed         Gnaphalium stramineum       pink everlasting         Gnaphalium stramineum       cotton-batting         Hedera canariensis       Algerian ivy       None         Hedypnois cretica       Crete weed       None         Heleinium puberulum       sneezeweed       None         Heliotropium curassavicum       heliotrope       Herniaria hirsuta ssp. cinerea       None         Hesperocnide tenella       western nettle       None         Heterotheca grandiflora       telegraph weed       Hirschfeldia incana       Moderate         Horkelia cuneata ssp. cuneata       short-podded mustard       Moderate         Horkelia cuneata ssp. cuneata       wedge-leaf horkelia       Hydrocotyle verticillata         Hypochaeris glabra       smooth cats-ear       Limited         Hypochaeris radicata       hairy cats-ear       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers	None None
Gnaphalium californicum       green everlasting         Gnaphalium luteo-album       weedy cudweed         Gnaphalium purpureum       purple cudweed         Gnaphalium ramosissimum       pink everlasting         Gnaphalium stramineum       cotton-batting         Hedera canariensis       Algerian ivy       None         Hedypnois cretica       Crete weed       None         Heleinium puberulum       sneezeweed       None         Heliotropium curassavicum       heliotrope       None         Hemiaria hirsuta ssp. cinerea       None         Hesperocnide tenella       western nettle         Heterotheca grandiflora       telegraph weed         Hirschfeldia incana       short-podded mustard       Moderate         Horkelia cuneata ssp. cuneata       wedge-leaf horkelia       Moderate         Hydrocotyle verticillata       whorled marsh pennyworl       Hypochaeris glabra       Limited         Hypochaeris radicata       hairy cats-ear       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw	None None High; No Alert
Gnaphalium luteo-album       weedy cudweed         Gnaphalium purpureum       purple cudweed         Gnaphalium ramosissimum       pink everlasting         Gnaphalium stramineum       cotton-batting         Hedera canariensis       Algerian ivy         None       None         Hedypnois cretica       Crete weed         None       None         Helenium puberulum       sneezeweed         Heliotropium curassavicum       heliotrope         Herniaria hirsuta ssp. cinerea       None         Hesperocnide tenella       western nettle         Hesperocnide tenella       western nettle         Heterotheca grandiflora       telegraph weed         Hirschfeldia incana       short-podded mustard       Moderate         Hordeum murinum       mouse barley, foxtail       Moderate         Horkelia cuneata ssp. cuneata       wedge-leaf horkelia         Hydrocotyle verticillata       whorled marsh pennyworl         Hypochaeris glabra       smooth cats-ear       Limited         Hypochaeris radicata       hairy cats-ear       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium	None None High; No Alert
Gnaphalium purpureum       purple cudweed         Gnaphalium ramosissimum       pink everlasting         Gnaphalium stramineum       cotton-batting         Hedera canariensis       Algerian ivy       None         Hedypnois cretica       Crete weed       None         Heleinum puberulum       sneezeweed       Heliotropium curassavicum         Herniaria hirsuta ssp. cinerea       None         Herniaria hirsuta ssp. cinerea       None         Hesperocnide tenella       western nettle         Heterotheca grandiflora       telegraph weed         Hirschfeldia incana       short-podded mustard       Moderate         Hordeum murinum       mouse barley, foxtail       Moderate         Horkelia cuneata ssp. cuneata       wedge-leaf horkelia         Hydrocotyle verticillata       whorled marsh pennyworl         Hypochaeris glabra       smooth cats-ear       Limited         Hypochaeris radicata       hairy cats-ear       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting	None None High; No Alert
Gnaphalium ramosissimum pink everlasting Gnaphalium stramineum cotton-batting Hedera canariensis Algerian ivy None Hedypnois cretica Crete weed None Heliotropium curassavicum heliotrope Hemiaria hirsuta ssp. cinerea None Hesperocnide tenella western nettle Heterotheca grandiflora telegraph weed Hirschfeldia incana short-podded mustard Moderate Hordeum murinum mouse barley, foxtail Moderate Hydrocotyle verticillata whorled marsh pennyworl Hypochaeris glabra smooth cats-ear Limited Hairy cats-ear Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium californicum	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting	None None High; No Alert
Gnaphalium stramineum Hedera canariensis Algerian ivy None Hedypnois cretica Crete weed None Helenium puberulum Heliotropium curassavicum Heliotropium curassavicum Herniaria hirsuta ssp. cinerea Herniaria hirsuta ssp. cinerea Hesperocnide tenella Western nettle Heterotheca grandiflora Hirschfeldia incana Hordeum murinum Moderate Hordeum murinum Moderate Hordeum durinum Moderate Hordelia cuneata ssp. cuneata Wedge-leaf horkelia Hydrocotyle verticillata Whorled marsh pennyworl Hypochaeris glabra Smooth cats-ear Limited Hypochaeris radicata	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium luteo-album	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed	None None High; No Alert
Hedera canariensis       Algerian ivy       None         Hedypnois cretica       Crete weed       None         Heleinium puberulum       sneezeweed         Heliotropium curassavicum       heliotrope         Herniaria hirsuta ssp. cinerea       None         Hesperocnide tenella       western nettle         Heterotheca grandiflora       telegraph weed         Hirschfeldia incana       short-podded mustard       Moderate         Horkelia cuneata ssp. cuneata       wedge-leaf horkelia         Hydrocotyle verticillata       whorled marsh pennyworl         Hypochaeris glabra       smooth cats-ear       Limited         Hypochaeris radicata       hairy cats-ear       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium luteo-album. Gnaphalium luteo-album. Gnaphalium purpureum	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed	None None High; No Alert
Hedypnois cretica       Crete weed       None         Helenium puberulum:       sneezeweed         Heliotropium curassavicum       heliotrope         Hemiaria hirsuta ssp. cinerea       None         Hesperocnide tenella       western nettle         Heterotheca grandiflora       telegraph weed         Hirschfeldia incana       short-podded mustard       Moderate         Hordeum murinum       mouse barley, foxtail       Moderate         Horkelia cuneata ssp. cuneata       wedge-leaf horkelia         Hydrocotyle verticillata       whorled marsh pennyworl         Hypochaeris glabra       smooth cats-ear       Limited         Hypochaeris radicata       hairy cats-ear       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium luteo-album. Gnaphalium purpureum. Gnaphalium ramosissimum.	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting	None None High; No Alert
Heliotropium curassavicum Herniaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana Hirschfeldia incana Hordeum murinum Horkelia cuneata ssp. cuneata Hydrocotyle verticillata Hydrocotyle verticillata Hypochaeris glabra Hypochaeris radicata Heliotrope None None None None None None Noderate Heliotrope None None None Noderate Heliotrope None None None Noderate Moderate Hordeum murinum Noderate Hydrocotyle verticillata Whorled marsh pennyworl Hypochaeris glabra Limited Hypochaeris radicata	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium purpureum. Gnaphalium purpureum. Gnaphalium ramosissimum Gnaphalium stramineum.	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting	None  None High; No Alert  Limited
Herniaria hirsuta ssp. cinerea  Hesperocnide tenella  Heterotheca grandiflora  Hirschfeldia incana  Hordeum murinum:  Horkelia cuneata ssp. cuneata  Hydrocotyle verticillata  Hypochaeris glabra  Hypochaeris radicata  None  None  None  None  None  None  Hesperocnide tenella  telegraph weed  Moderate  Moderate  Moderate  Hordeum furinum:  wedge-leaf horkelia  Hydrocotyle verticillata  Hypochaeris glabra  Smooth cats-ear  Limited  Hypochaeris radicata	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium purpureum Gnaphalium purpureum Gnaphalium stramineum Hedera canariensis Hedypnois cretica	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed	None  None High; No Alert  Limited  None
Hesperocnide tenella       western nettle         Heterotheca grandiflora       telegraph weed         Hirschfelda incana       short-podded mustard       Moderate         Hordeum murinum.       mouse barley, foxtail       Moderate         Horkelia cuneata ssp. cuneata       wedge-leaf horkelia       Hydrocotyle verticillata         Hydrocotyle verticillata       whorled marsh pennyworl       Hypochaeris glabra         Hypochaeris radicata       smooth cats-ear       Limited         Hypochaeris radicata       hairy cats-ear       Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium luteo-album Gnaphalium purpureum Gnaphalium ramosissimum Gnaphalium stramineum Hedera canariensis Hedypnois cretica Helenium puberulum	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed sneezeweed	None  None High; No Alert  Limited  None
Heterotheca grandiflora telegraph weed  Hirschfeldia incana short-podded mustard Moderate  Hordeum murinum mouse barley, foxtail Moderate  Horkelia cuneata ssp. cuneata wedge-leaf horkelia  Hydrocotyle verticillata whorled marsh pennyworl  Hypochaeris glabra smooth cats-ear Limited  Hypochaeris radicata hairy cats-ear Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium bicolor Gnaphalium luteo-album. Gnaphalium purpureum Gnaphalium stramineum. Hedera canariensis Hedypnois cretica Helenium puberulum. Heliotropium curassavicum	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed sneezeweed	None  None  High; No Alert  Limited  None  None  None
Hirschfeldia incana short-podded mustard Moderate Hordeum murinum mouse barley, foxtail Moderate Horkelia cuneata ssp. cuneata wedge-leaf horkelia Hydrocotyle verticillata whorled marsh pennyworl Hypochaeris glabra smooth cats-ear Limited Hypochaeris radicata hairy cats-ear Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium luteo-album. Gnaphalium purpureum Gnaphalium purpureum Gnaphalium stramineum. Hedera canariensis Hedypnois cretica Helenium puberulum. Heliotropium curassavicum. Herniaria hirsuta ssp. cinerea	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed sneezeweed heliotrope	None  None  High; No Alert  Limited  None  None  None
Hordeum murinum.     mouse barley, foxtail     Moderate       Horkelia cuneata ssp. cuneata     wedge-leaf horkelia       Hydrocotyle verticillata     whorled marsh pennyworl       Hypochaeris glabra     smooth cats-ear     Limited       Hypochaeris radicata     hairy cats-ear     Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium purpureum. Gnaphalium pramosissimum Gnaphalium stramineum. Hedera canariensis Hedypnois cretica Helenium puberulum. Heliotropium curassavicum Hemiaria hirsuta ssp. cinerea Hesperocnide tenella	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed sneezeweed heliotrope western nettle	None  None  High; No Alert  Limited  None  None  None
Horkelia cuneata ssp. cuneata     wedge-leaf horkelia       Hydrocotyle verticillata     whorled marsh pennyworl       Hypochaeris glabra     smooth cats-ear     Limited       Hypochaeris radicata     hairy cats-ear     Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium purpureum Gnaphalium purpureum Gnaphalium stramineum Hedera canariensis Hedypnois cretica Helenium puberulum Heliotropium curassavicum Herniaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed	None None High; No Alert  Limited  None None None
Hydrocotyle verticillata     whorled marsh pennyworl       Hypochaeris glabra     smooth cats-ear     Limited       Hypochaeris radicata     hairy cats-ear     Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium ramosissimum Gnaphalium ramosissimum Gnaphalium stramineum Hedera canariensis Hedypnois cretica Helenium puberulum Herniaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed short-podded mustard	None  None High; No Alert  Limited  None None None  None  Moderate
Hypochaeris glabra     smooth cats-ear     Limited       Hypochaeris radicata     hairy cats-ear     Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium luteo-album Gnaphalium purpureum Gnaphalium ramosissimum Gnaphalium stramineum Hedera canariensis Hedypnois cretica Helenium puberulum Heliotropium curassavicum Hemiaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana Hordeum murinum	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed short-podded mustard mouse barley, foxtail	None  None High; No Alert  Limited  None None None  None  Moderate
Hypochaeris radicata hairy cats-ear Limited	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium bicolor Gnaphalium luteo-album. Gnaphalium purpureum Gnaphalium stramineum. Hedera canariensis Hedypnois cretica Helenium puberulum. Heliotropium curassavicum Hemiaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana Hordeum murinum. Horkelia cuneata ssp. cuneata	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed short-podded mustard mouse barley, foxtail wedge-leaf horkelia	None  None High; No Alert  Limited  None None None  None  Moderate
	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum. Geranium dissectum Gnaphalium bicolor Gnaphalium luteo-album. Gnaphalium purpureum Gnaphalium purpureum. Gnaphalium stramineum. Hedera canariensis Hedera canariensis Hedera chiloenium curassavicum Heliotropium curassavicum Herniaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana Hordeum murinum. Horkelia cuneata ssp. cuneata Hydrocotyle verticillata	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting cotton-batting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed short-podded mustard mouse barley, foxtail wedge-leaf horkelia whorled marsh pennywort	None  None High; No Alert  Limited  None None None  Moderate Moderate
risocoma menziesii - Tcoasiai goigendush - T	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium bicolor Gnaphalium luteo-album Gnaphalium purpureum Gnaphalium stramineum Hedera canariensis Hedypnois cretica Helenium puberulum Heliotropium curassavicum Hemiaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana Hordeum muraum Horkelia cuneata ssp. cuneata Hydrocotyle verticillata Hypochaeris glabra	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed short-podded mustard mouse barley, foxtail wedge-leaf horkelia whorled marsh pennywort smooth cats-ear	None  None High; No Alert  Limited  None  None  None  Moderate Moderate Limited
	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium purpureum Gnaphalium purpureum Gnaphalium stramineum Hedera canariensis Hedypnois cretica Helenium puberulum Heliotropium curassavicum Herniaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana Hordeum murinum Horkelia cuneata ssp. cuneata Hydrocotyle verticillata Hypochaeris glabra Hypochaeris radicata	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed short-podded mustard mouse barley, foxtail wedge-leaf horkelia whorled marsh pennyworl smooth cats-ear hairy cats-ear	None  None High; No Alert  Limited  None  None  None  Moderate Moderate Limited
	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium luteo-album Gnaphalium ramosissimum Gnaphalium ramosissimum Gnaphalium stramineum Hedera canariensis Hedypnois cretica Helenium puberulum Heliotropium curassavicum Herniaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana Hordeum murinum Horkelia cuneata ssp. cuneata Hydrocotyle verticillata Hypochaeris glabra Hypochaeris radicata Isocoma menziesii	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed short-podded mustard mouse barley, foxtail wedge-leaf horkelia whorled marsh pennywort smooth cats-ear hairy cats-ear coastal goldenbush	None  None High; No Alert  Limited  None  None  None  Moderate Moderate Limited
Juncus aff. textilis indian rush	Eucalyptus globulus Euphorbia peplus Euthamia occidentalis Filago californica Filago gallica Foeniculum vulgare Fragaria chiloensis Galium aparine Galium californicum spp. maritimum Geranium dissectum Gnaphalium bicolor Gnaphalium californicum Gnaphalium purpureum Gnaphalium purpureum Gnaphalium stramineum Hedera canariensis Hedypnois cretica Helenium puberulum Heliotropium curassavicum Herniaria hirsuta ssp. cinerea Hesperocnide tenella Heterotheca grandiflora Hirschfeldia incana Hordeum murinum Horkelia cuneata ssp. cuneata Hydrocotyle verticillata Hypochaeris glabra Hypochaeris radicata	blue gum petty spurge western goldenrod California filago  fennel beach strawberry cleavers California bedstraw cutleaf geranium bicolored everlasting green everlasting weedy cudweed purple cudweed pink everlasting Algerian ivy Crete weed sneezeweed heliotrope  western nettle telegraph weed short-podded mustard mouse barley, foxtail wedge-leaf horkelia whorled marsh pennyworl smooth cats-ear hairy cats-ear	None  None High; No Alert  Limited  None  None  None  Moderate Moderate Limited

Scientific Name	Common Name	Special Status
Juncus bufonius	common toad rush	
Juncus lesueurii	dune rush	
Koeleria sp.?		
Lactuca serriola	prickly lettuce	Evaluated, but not listed
Lamarckia aurea	goldentop	None
Lastarriaea coriacea	spineflower	
Lasthenia gracilis	goldfields	
Lavatera assurgentiflora ssp. assurgentiflora	malva rosa, island bush mallow	
Lavatera cretica	Cretean lavatera	None
Layia glandulosa	tidytips	
Layia hieracioides	tall layia	
Lemna sp.	duckweed	
Lepidium didymum	wart cress	
Lepidium strictum		None
Leptodactylon californicum	prickly phlox	
Lessingia glandulifera var. pectinata	valley lessingia	
Leymus condensatus	giant rye	
Linaria canadensis	toad flax	
Loeflingia squarrosa	California loeflingia	
Loeflingia squarrosa		
Lolium multiflorum	Italian rye	None
Lonicera involucrata var. ledebourii	twinberry	
Lotus heermannii var. orbicularis	prostrate deerweed	
Lotus purshianus	Spanish clover	
Lotus scoparius var. scoparius	deerweed	
Lotus strigosus	bishop lotus	
Lupinus arboreus	yellow bush lupine	
Lupinus chamissonis	silver dune lupine	
Lupinus nipomensis		FE/CE/CNPS List 1B/Endemic
	Nipomo Mesa Iupine	FE/CE/CNP5 LIST 1B/Endemic
Malacothrix californica	California malacothrix	ONIDOLICA
Malacothrix incana	dunedelion	CNPS List 4
Malva nicaeensis	bull mallow	None
Malva parviflora	cheeseweed	None
Medicago polymorpha	burclover	None
Medicago polymorpha var. brevispina	bur-clover	Limited
Medicago polymorpha var. polymorpha	bur-clover	Limited
Melica imperfecta	coast range melic	
Melilotus albus`	white sweet-clover	None
Melilotus indicus	yellow sweetclover	None
Micropus californicus	slender cottonweed	
Mimulus guttatus	common monkey flower	
Monardella crispa	crisp monardella	CNPS List 1B/Endemic
Monardella frutescens	San Luis Obispo monardella	CNPS List 1B/Endemic
Morella [Myrica] californica	Pacific wax-myrtle	
Mucronea californica	California spineflower	CNPS List 4
Myoporum laetum	myoporum	None
Nemacaulis denudata var. denudata	coast woolly-heads	CNPS List 1B/Range Extension
Oenanthe sarmentosa	water parsley	<u> </u>
Oenothera elata ssp. hookeri	Hooker's evening primrose	
Orobanche californica ssp. grandis	California broomrape	Endemic
Orthocarpus densiflorus	owl's clover	
		None
Oxalis pes-caprae	Bermuda buttercup	None Limited
Oxalis pes-caprae Pennisetum clandestinum	Bermuda buttercup kikuyu grass	None Limited
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis	Bermuda buttercup kikuyu grass silverback fern	
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans	Bermuda buttercup kikuyu grass silverback fern wild heliotrope	
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia	
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia	Limited
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm	
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food	Limited  None
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue	Limited  None  Low; No Alert
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted)	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine	Limited  None  Low; No Alert  None
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass	Limited  None  Low; No Alert  None  Limited
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira?	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass mock orange	Limited  None  Low; No Alert  None  Limited  None
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain	Limited  None  Low; No Alert  None  Limited
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago erecta	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain	Limited  None  Low; No Alert  None  Limited  None  Evaluated, but not listed
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago erecta Plantago lanceolata	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain	Limited  None  Low; No Alert  None  Limited  None  Evaluated, but not listed  Limited
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago erecta Plantago lanceolata Plantago major	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain	Limited  None  Low; No Alert  None  Limited  None  Evaluated, but not listed
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago lanceolata Plantago major Platanus racemosa	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain western sycamore	Limited  None  Low; No Alert  None  Limited  None  Evaluated, but not listed  Limited  None
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago erecta Plantago major Platanus racemosa Poa annua	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain	Limited  None  Low; No Alert  None  Limited  None  Evaluated, but not listed  Limited
Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phacelia distans Phacelia douglasii Phacelia ramosissima Phoenix canariensis Pholisma arenarium Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago lanceolata Plantago major Platanus racemosa	Bermuda buttercup kikuyu grass silverback fern wild heliotrope Douglas' phacelia branching phacelia Canary Island date palm sand food bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain western sycamore	Limited  None  Low; No Alert  None  Limited  None  Evaluated, but not listed  Limited  None

Cajantifia Nama	Common Namo	Chariel Ctatus
Scientific Name Polygonum arenastrum	Common Name common knotweed	Special Status None
Polygonum punctatum	dotted smartweed	None
Polypogon monspeliensis	rabbits-foot grass	None
Populus balsamifera ssp. trichocarpa	black cottonwood	
Portulaca oleracea	purslane	None
Potentilla anserina ssp. pacifica	silverweed	
Prunus fasciculata var. punctata	sand almond	CNPS List 4/Endemic
Prunus persica	peach	
Pterostegia drymarioides	fairy mist	1 ::4
Raphanus sativus Rhamnus californica	wild radish	Limited
Ribes divaricatum var. pubiflorum	coffeeberry straggly gooseberry	
Ribes sanguineum var. glutinosum	pink-flowered current	
Ricinus communis	castor bean	Limited
Rorippa nasturtium-aquaticum	watercress	Emmod
Rorippa palustris var. occidentalis	marsh cress	
Rubus ursinus	western blackberry	
Rumex acetosella	sheep sorrel	
Rumex conglomeratus	green dock	None
Rumex crispus	curly dock	Limited
Sagina apetala	dwarf pearlwort	
Salix lasiolepis	arroyo willow	
Salix lucida ssp. lasiandra Salvia columbariae	yellow willow chia	
Salvia mellifera	black sage	
Salvia sp.	black sage	None
Sambucus mexicana	Mexican elderberry	None
Schinus sp.	INICAIGUIT CIGCIDOTTY	None
Schismus arabicus	Arabian grass	None
Scirpus californicus	California bulrush	
Scirpus cernuus	low clubrush	
Scirpus maritimus	prairie bulrush	
Scirpus microcarpus	panicled bulrush	None
Senecio blochmaniae	Blochman's groundsel	CNPS List 4/Endemic
Senecio vulgaris	common groundsel	None
Silene gallica	windmill pink	None
Silene gallica Silene laciniata ssp. major	windmill pink catchfly	None
Silene gallica Silene laciniata ssp. major Solanum americanum	windmill pink catchfly small-flowered nightshade	None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii	windmill pink catchfly small-flowered nightshade Douglas' nightshade	None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis	windmill pink catchfly small-flowered nightshade	None  Evaluated, but not listed
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod	
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle	Evaluated, but not listed
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey	Evaluated, but not listed None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey	Evaluated, but not listed None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey	Evaluated, but not listed  None  None  None  None  None  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed	Evaluated, but not listed None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia villosa Stellaria media Stephanomeria sp.	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce	Evaluated, but not listed  None  None  None  None  None  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus aleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce	Evaluated, but not listed  None  None  None  None  None  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce western poison-oak	Evaluated, but not listed  None  None  None  None  None  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce western poison-oak rose clover	Evaluated, but not listed None None None None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergularia versiis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium	Evaluated, but not listed  None  None  None  None  None  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce western poison-oak rose clover	Evaluated, but not listed None None None None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha domingensis Typha latifolia Uropappus lindleyi	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs	Evaluated, but not listed None None None None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha domingensis Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle	Evaluated, but not listed None None None None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle	Evaluated, but not listed None None None None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain	Evaluated, but not listed None None None None None None Evaluated, but not listed  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha domingensis Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain water speedwell	Evaluated, but not listed None None None None None None Vone None None None  Evaluated, but not listed  None  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha domingensis Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica Vicia sativa ssp. nigra?	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain	Evaluated, but not listed None None None None None None Evaluated, but not listed  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha domingensis Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica Vicia sp.	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail biroad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain water speedwell narrow-leaved vetch, common vetch	Evaluated, but not listed  None  None  None  None  None  None  None  None  Evaluated, but not listed  None  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica Vicia sativa ssp. Vulpia bromoides	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain water speedwell narrow-leaved vetch, common vetch	Evaluated, but not listed  None  None  None  None  None  None  None  Evaluated, but not listed  None  None  Evaluated, but not listed
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica Vicia sp. Vulpia bromoides Vulpia myuros var. hirsuta	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce wire-lettuce garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain water speedwell narrow-leaved vetch, common vetch brome fescue foxtail fescue	Evaluated, but not listed  None  None  None  None  None  None  None  None  Evaluated, but not listed  None  None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum: Trifolium hirtum Tropapolum majus Typha domingensis Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica Vicia sp. Vulpia bromoides Vulpia myuros var. hirsuta Vulpia octoflora	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain water speedwell narrow-leaved vetch, common vetch  brome fescue foxtail fescue six-weeks fescue	Evaluated, but not listed None None None None None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica Vicia sp. Vulpia bromoides Vulpia myuros var. hirsuta	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce wire-lettuce garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain water speedwell narrow-leaved vetch, common vetch brome fescue foxtail fescue	Evaluated, but not listed None None None None None None None None
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergularia bocconei Spergularia villosa Stellaria media Stephanomeria sp. Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha domingensis Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica Vicia sp. Vulpia myuros var. hirsuta Vulpia myuros var. hirsuta Vulpia octoflora Xanthium strumarium	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain water speedwell narrow-leaved vetch, common vetch  brome fescue foxtail fescue six-weeks fescue cocklebur	Evaluated, but not listed  None  None  None  None  None  None  None  Evaluated, but not listed  None  None  None  Evaluated, but not listed
Silene gallica Silene laciniata ssp. major Solanum americanum Solanum douglasii Solidago confinis Sonchus asper Sonchus asper Sonchus oleraceus Sparganium eurycarpum Spergula arvensis Spergularia villosa Stellaria media Stephanomeria virgata Toxicodendron diversilobum Trifolium hirtum Tropaeolum majus Typha domingensis Typha latifolia Uropappus lindleyi Urtica dioica ssp. holosericea Urtica urens Verbena lasiostachys var. lasiostachys Veronica anagallis-aquatica Vicia sp. Vulpia bromoides Vulpia myuros var. hirsuta Vulpia octoflora Xanthium strumarium Yabea microcarpa	windmill pink catchfly small-flowered nightshade Douglas' nightshade southern goldenrod prickly sow-thistle common sow-thistle broad-fruited bur-reed corn spurrey sand spurrey perennial sand spurrey common chickweed wire-lettuce wire-lettuce western poison-oak rose clover garden nasturtium narrow-leaved cattail broad-leaved cattail silver puffs giant creek nettle dwarf nettle western vervain water speedwell narrow-leaved vetch, common vetch  brome fescue six-weeks fescue cocklebur California hedge parsley	Evaluated, but not listed None None None None None None None None

Non-native or Invasive Species with Californ Invasive Plant Council (IPC) rating
Special Status

U.S.Fish and Wildlife Service (USFWS)

FE: Federally Endangered FT: Federally Threatened

Central Coast Endemics (10) Special Status Species (13)

California Department of Fish and Game

(CDFG)

CE: California Endangered CT: California Threatened

<u>California Native Plant Society (CNPS)</u> <u>List 1B: Plants rare, threatened, or</u> endangered in California and elsewhere List 4: Plants of limited distribution- a watch list

## Plant Species Observed 2005-2006 Creek Road, Ocean Street, and Silver Spur Place

Scientific Name	Common Name	Special Status
Acer negundo var. californicum	box elder	Special Status
Achillea millefolium	yarrow	
Agrostis viridis	water bent grass	None
Ambrosia chamissonis	silver beach weed, beach bur	
Ambrosia psilostachya	western ragweed	
Ammophila arenaria	European beachgrass	High
Anagallis arvensis	scarlet pimpernel	
Anthemis cotula	mayweed	
Apium graveolens	celery	
Artemisia californica	coastal sagebrush	
Artemisia douglasiana	mugwort giant reed	High
Arundo donax Aster sp.	glant reed	High
Atriplex triangularis	spear-scale	
Avena barbata	slender wild oats	
Baccharis pilularis	coyote bush	
Brachypodium distachyon	false brome	
Bromus carinatus	California brome	
Bromus catharticus	rescue grass	None
Bromus diandrus	ripgut brome	Moderate
Bromus hordeaceus	soft brome	
Cakile maritima	sea rocket	Limited
Calystegia macrostegia ssp. cyclostegia	coastal morning-glory	
Camissonia cheiranthifolia ssp. cheiranthifolia	beach primrose	
Camissonia micrantha	sun cups	
Cardamine oligosperma	bitter cress	
Cardaria draba	hoary cress	
Carduus pycnocephalus	Italian thistle	Moderate
Carex sp.	sedge	10.1
Carpobrotus edulis	hottentot-fig	High
Castilleja affinis ssp. affinis Centaurea melitensis	indian paintbrush tocalote	
Cerastium glomeratum	mouse-eared chickweed	None
Chamomilla suaveolens	pineapple weed	None
Chenopodium ambrosioides	Mexican tea	None
Chenopodium murale	nettle-leaf goosefoot	110110
Chorizanthe angustifolia	narrowleaf spineflower	
Chrysanthemum coronarium	garland chrysanthemum	
Claytonia parviflora ssp. parviflora		
Claytonia perfoliata ssp. mexicana	miners' lettuce	
Clematis ligusticifolia	creek clematis	
Conicosia pugioniformis	slender-leaved ice plant	Limited
Conium maculatum	poison hemlock	Moderate
Conyza bonariensis	flax-leaved fleabane	
Conyza canadensis	horseweed	
Corethrogyne filaginifolia Cortaderia selloana	cudweed aster pampas grass	High
Cotoneaster pannosa	cotoneaster	riigii
Cotula australis	Australian brass-buttons	
Cotula coronopifolia	brass-buttons	
Crassula connata	pygmy weed	
Croton californicus	California croton	
Cryptantha clevelandii	common cryptantha	
Cynodon dactylon	Bermuda grass	Moderate; No Alert
Cyperus sp.		
Daucus pusillus	rattlesnake weed	
Delairea odorata	German ivy, cape ivy	High
Distichlis spicata	saltgrass	10.1
Ehrharta calycina	purple veldt grass	High, Alert
Epilobium ciliatum	willow herb	
Equisetum telmateia ssp. braunii	giant horsetail	
Ericameria ericoides	mock heather, heather goldenbush	CNDS Lint 1D
Erigeron blochmaniae Eriogonum parvifolium	Blochman's leafy daisy seacliff buckwheat	CNPS List 1B
Erodium cicutarium	red-stem filaree, afilerillo	Limited
Erodiam diodiamam	roa storr marco, amornio	Limited

## Plant Species Observed 2005-2006 Creek Road, Ocean Street, and Silver Spur Place

Scientific Name	Common Name	Special Status
Eschscholzia californica	California poppy	
Eucalyptus globulus	blue gum	Moderate
Euphorbia peplus	petty spurge	None
Euthamia occidentalis	western goldenrod	
Filago californica	California filago	
Filago gallica		
Foeniculum vulgare	fennel	High
Galium aparine	cleavers	
Geranium dissectum	cutleaf geranium	Limited
Gnaphalium californicum	green everlasting	
Gnaphalium luteo-album	weedy cudweed	
Gnaphalium purpureum	purple cudweed	
Gnaphalium stramineum	cotton-batting	
Hedera canariensis	Algerian ivy	
Hedypnois cretica	Crete weed	
Helenium puberulum	sneezeweed	
Heliotropium curassavicum	heliotrope	
Herniaria hirsuta ssp. cinerea		
Hesperocnide tenella	western nettle	
Heterotheca grandiflora	telegraph weed	
Hirschfeldia incana	short-podded mustard	Moderate
Hordeum murinum	mouse barley, foxtail	Moderate
Hypochaeris glabra	smooth cats-ear	
Hypochaeris radicata	hairy cats-ear	Limited
Isocoma menziesii	coastal goldenbush	
Jaumea carnosa	jaumea	
Juncus acutus ssp. leopoldii	spiny rush	
Juncus bufonius	common toad rush	
Juncus lesueurii	dune rush	
Lactuca serriola	prickly lettuce	Evaluated, but not listed
Lavatera assurgentiflora ssp. assurgentiflora	malva rosa, island bush mallow	
Lavatera cretica	Cretean lavatera	None
Lepidium strictum	le P	
Lolium multiflorum	Italian ryegrass	
Lonicera involucrata var. ledebourii	twinberry	
Lotus heermannii var. orbicularis	prostrate deerweed	
Lotus purshianus	Spanish clover	
Lupinus arboreus	yellow bush lupine	
Lupinus chamissonis	silver dune lupine	
Malva nicaeensis	bull mallow	
Malva nicaeensis Malva parviflora	bull mallow cheeseweed	Post
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina	bull mallow cheeseweed bur-clover	Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha	bull mallow cheeseweed bur-clover bur-clover	Limited Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus`	bull mallow cheeseweed bur-clover bur-clover white sweet-clover	
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus' Melilotus indicus	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover	
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower	
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle	
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum	
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley	
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose	
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup	Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass	
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern	Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm	Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue	Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Medilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted)	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine	Limited  Limited  Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted) Piptatherum miliaceum	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass	Limited  Limited  Limited  Limited  Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira?	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass mock orange	Limited  Limited  Limited  Limited  Limited  None
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Medilotus albus' Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echiodes Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain	Limited  Limited  Limited  Limited  Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago erecta	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain	Limited  Limited  Limited  Limited  None  Evaluated, but not listed
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago erocta Plantago lanceolata	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain	Limited  Limited  Limited  Limited  Limited  None
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago lanceolata Plantago major	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain	Limited  Limited  Limited  Limited  None Evaluated, but not listed
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago coronopus Plantago lanceolata Plantago major Platanus racemosa	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain western sycamore	Limited  Limited  Limited  Limited  None  Evaluated, but not listed  Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Medilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago erecta Plantago major Platanus racemosa Poa annua	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain	Limited  Limited  Limited  Limited  None  Evaluated, but not listed
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Medicago polymorpha var. polymorpha Melilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echiodes Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago erecta Plantago lanceolata Plantago major Platanus racemosa Poa annua Poa sp.	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Montreey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain western sycamore annual bluegrass	Limited  Limited  Limited  Limited  None  Evaluated, but not listed  Limited
Malva nicaeensis Malva parviflora Medicago polymorpha var. brevispina Medicago polymorpha var. polymorpha Medilotus albus` Melilotus indicus Mimulus guttatus Morella [Myrica] californica Myoporum laetum Oenanthe sarmentosa Oenothera elata ssp. hookeri Oxalis pes-caprae Pennisetum clandestinum Pentagramma triangularis Phoenix canariensis Picris echioides Pinus radiata (planted) Piptatherum miliaceum Pittosporum tobira? Plantago erecta Plantago major Platanus racemosa Poa annua	bull mallow cheeseweed bur-clover bur-clover white sweet-clover yellow sweet-clover common monkey flower Pacific wax-myrtle myoporum water parsley Hooker's evening primrose Bermuda buttercup kikuyu grass silverback fern Canary Island date palm bristly ox tongue Monterey pine smilo, rice grass mock orange cut-leaf plantain California plantain English plantain common plantain western sycamore	Limited  Limited  Limited  Limited  None  Evaluated, but not listed  Limited

## Plant Species Observed 2005-2006 Creek Road, Ocean Street, and Silver Spur Place

Scientific Name	Common Name	Special Status
Polypogon monspeliensis	rabbits-foot grass	
Populus balsamifera ssp. trichocarpa	black cottonwood	
Potentilla anserina ssp. pacifica	silverweed	
Prunus persica	peach	
Pterostegia drymarioides	fairy mist	
Raphanus sativus	wild radish	Limited
Ribes sp.	gooseberry	
Ricinus communis	castor bean	Limited
Rorippa nasturtium-aquaticum	watercress	
Rubus ursinus	western blackberry	
Rumex acetosella	sheep sorrel	
Rumex conglomeratus	green dock	None
Rumex crispus	curly dock	Limited
Sagina apetala	dwarf pearlwort	
Salix lasiolepis	arroyo willow	
Salix lucida ssp. lasiandra	vellow willow	
Salvia sp.		
Schinus sp.		
Schismus arabicus	Arabian grass	None
Scirpus californicus	California bulrush	
Scirpus maritimus	prairie bulrush	
Scirpus microcarpus	panicled bulrush	
Senecio blochmaniae	Blochman's groundsel	CNPS List 4
Senecio vulgaris	common groundsel	
Silene gallica	windmill pink	
Solanum douglasii	Douglas' nightshade	
Solidago confinis	southern goldenrod	
Sonchus asper	prickly sow-thistle	Evaluated, but not listed
Sonchus oleraceus	common sow-thistle	None
Sparganium eurycarpum	broad-fruited bur-reed	
Spergularia bocconei	sand spurrey	
Stellaria media	common chickweed	None
Toxicodendron diversilobum	western poison-oak	
Trifolium hirtum	rose clover	
Tropaeolum majus	garden nasturtium	Evaluated, but not listed
Typha domingensis	narrow-leaved cattail	
Urtica dioica ssp. holosericea	giant creek nettle	
Urtica urens	dwarf nettle	
Veronica anagallis-aquatica	water speedwell	
Vicia sativa ssp. nigra?	narrow-leaved vetch, common vetch	None
Vicia sp.		
Vulpia bromoides	brome fescue	Evaluated, but not listed
Vulpia myuros var. hirsuta	foxtail fescue	Moderate
Vulpia octoflora	six-weeks fescue	doato
Xanthium strumarium	cocklebur	
Zantedeschia aethiopica	calla lily	Limited

Non-native or Invasive Species with California Invasive Plant Council (IPC) rating
Special Status

U.S.Fish and Wildlife Service (USFWS)
FE: Federally Endangered

FT: Federally Threatened

### California Department of Fish and Game (CDFG)

CE: California Endangered CT: California Threatened

<u>California Native Plant Society (CNPS)</u> <u>List 1B: Plants rare, threatened, or endangered in</u>

California and elsewhere

List 4: Plants of limited distribution- a watch list

## Plant Species Observed 2005-2006 ConocoPhillips

Caiantifia Nama	Common Nama	Special Status
Scientific Name Abronia umbellata	Common Name beach sand-verbena	Special Status
Achillea millefolium	varrow	
Ambrosia chamissonis	silver beach weed, beach bur	
Amsinckia sp.	fiddleneck	
Anagallis arvensis	scarlet pimpernel	None
Artemisia californica	coastal sagebrush	None
Artemisia damernida  Artemisia dracunculus	tarragon	
Baccharis pilularis	coyote brush	
Brassica tournefortii	Sahara mustard	High
Bromus carinatus	California brome	riigii
Bromus diandrus	Ripgut Brome	Moderate
Bromus madritensis ssp. rubens	red brome	High
Calyptridium monandrum	100 2101110	· ng.
Camissonia cheiranthifolia ssp. cheiranthifolia	beach primrose	
Camissonia micrantha	sun cups	
Camissonia strigulosa		
Cardionema ramosissimum	sandmat	
Carex sp.	sedge	
Carpobrotus edulis	hottentot-fig	High
Castilleja affinis ssp. affinis	indian paintbrush	· · · · · ·
Castilleja densiflora	owl's clover	
Centaurea melitensis	tocalote	Moderate
Chaenactis glabriuscula var. lanosa	yellow pincushion	
Chamomilla suaveolens	pineapple weed	
Chenopodium californicum	soap root	
Chenopodium murale	nettle-leaf goosefoot	None
Chorizanthe angustifolia	narrowleaf spineflower	
Cirsium occidentale var. occidentale	cobweb thistle	
Claytonia parviflora ssp. parviflora		
Claytonia perfoliata ssp. mexicana	miner's lettuce	
Conicosia pugioniformis	pig root	Limited
Conyza canadensis	horseweed	None
Corethrogyne filaginifolia	cudweed aster	
Crassula connata	pigmy weed	
Croton californicus	California croton	
Cryptantha clevelandii	common cryptantha	
Cuscuta sp.	dodder	
Deinandra [Hemizonia] increscens var.	tarweed	
increscens	tarweed	
Delphinium parishii ssp . blochmaniae?	dune larkspur	CNPS List 1B
Descurainia pinnata	western tansy mustard	
Dichelostemma capitatum	blue dicks	
Dudleya caespitosa	sand-lettuce	
Eschscholzia californica	California poppy	
Ehrharta calycina	purple veldt grass	High, Alert
Erigeron blochmaniae	Blochman's leafy daisy	CNPS List 1B
Erigeron foliosus	leafy daisy	
Ericameria ericoides	mock heather, heather goldenbush	
Eriogonum parvifolium	seacliff buckwheat	.,
Erodium botrys	filaree, storksbill	None
Erodium cicutarium	redstem filaree, afilerillo	Limited
Erysimum insulare ssp. suffrutescens	dune wallflower	CNPS List 4
Eschscholzia californica	California poppy	
Filago californica	California filago	
Filago gallica	O-l'Y-maile hardetease	
Galium californicum spp. maritimum	California bedstraw	
Gnaphalium bicolor	bicolored everlasting	
Gnaphalium californicum	green everlasting	
Gnaphalium stramineum	cotton-batting	N
Herniaria hirsuta ssp. cinerea	and the second s	None
Hesperocnide tenella	western nettle	
Heterotheca grandiflora	telegraph weed	M. I
Hordeum murinum	foxtail	Moderate
Hypochaeris glabra	smooth cats-ear	Limited
Hirschfeldia incana Horkelia cuneata ssp. cuneata	shortpod mustard	Moderate
	wedge-leaf horkelia	1

## Plant Species Observed 2005-2006 ConocoPhillips

Scientific Name	Common Name	Special Status
Juncus lesueurii	dune rush	
Koeleria sp.?		
Lamarckia aurea	goldentop	None
Lastarriaea coriacea	spineflower	
Lasthenia gracilis	goldfields	
Layia glandulosa	tidytips	
Lavia hieracioides	tall lavia	
Leptodactylon californicum	prickly phlox	
Lessingia glandulifera var. pectinata	valley lessingia	
Linaria canadensis	toad flax	
Lotus scoparius var. scoparius	deerweed	
Lotus strigosus	bishop lotus	
Lupinus arboreus	vellow bush lupine	
Lupinus chamissonis	silver dune lupine	
Lupinus nipomensis	Nipomo Mesa Iupine	FE/CE/CNPS List 1B
Malacothrix californica	California malacothrix	
Melica imperfecta	coast range melic	
Micropus californicus	slender cottonweed	
Monardella crispa	crisp monardella	CNPS List 1B
Monardella frutescens	San Luis Obispo monardella	CNPS List 1B
Mucronea californica	California spineflower	CNPS List 4
Orthocarpus densiflorus	owl's clover	0.11 0 2.00
Phacelia distans	wild heliotrope	
Phacelia douglasii	Douglas' phacelia	
Phacelia ramosissima	branching phacelia	
Pholisma arenarium	sand food	
Plantago coronopus	cut-leaved plantain	None
Plantago erecta	California plantain	110.10
Prunus fasciculata var. punctata	sand almond	CNPS List 4
Pterostegia drymarioides	fairy mist	
Rhamnus californica	coffeeberry	
Salix lasiolepis	arroyo willow	
Salvia columbariae	chia	
Salvia mellifera	black sage	
Sambucus mexicana	Mexican elderberry	
Schismus arabicus	Arabian grass	None
Senecio blochmaniae	Blochman's groundsel	CNPS List 4
Silene gallica	windmill pink	
Silene laciniata ssp. major	catchfly	
Solanum douglasii	Douglas' nightshade	
Sonchus oleraceus	common sow-thistle	None
Spergula arvensis	corn spurrey	None
Spergularia bocconei	sand spurrey	None
Spergularia villosa	perennial sand spurrey	None
Stellaria media	common chickweed	None
Stephanomeria virgata	wire-lettuce	
Toxicodendron diversilobum	western poison-oak	
Uropappus lindleyi	silver puffs	<u> </u>
Vulpia bromoides	brome fescue	Evaluated, but not listed
Vulpia myuros var. hirsuta	foxtail fescue	Moderate
Vulpia octoflora	six-weeks fescue	Moderate
ναιρια οσισποια	31V-AACQV9 1C9CAC	

Non native or Invasive Species with California Invasive Plant Council (IPC) rating
Special Status

KEY <u>U.S.Fish and Wildlife Service (USFWS)</u> FE: Federally Endangered

FT: Federally Threatened

California Department of Fish and Game (CDFG)

CE: California Endangered CT: California Threatened

<u>California Native Plant Society (CNPS)</u> <u>List 1B: Plants rare, threatened, or endangered in</u>

California and elsewhere

List 4: Plants of limited distribution- a watch list

## Plant Species Observed 2005-2006 Oso Flaco

		0 110
Scientific Name	Common Name	Special Status CNPS List 4
Abronia maritima Abronia umbellata	sticky sand-verbena beach sand-verbena	CNP5 LIST 4
Achillea millefolium	yarrow	
Agrostis viridis	water bent grass	None
Ambrosia chamissonis	silver beach weed, beach bur, beach bursage	110110
Ammophila arenaria	European beachgrass	High; No Alert
Amsinckia sp.	fiddleneck	riigii, No Aleit
Anagallis arvensis	scarlet pimpernel	
Apium graveolens	celery	
Artemisia californica	coastal sagebrush	
Artemisia douglasiana	mugwort	
Astragalus nuttallii var. nuttallii	Nuttall's locoweed	CNPS List 4
Baccharis douglasii	sticky baccharis	
Baccharis pilularis	coyote brush	
Briza maxima	rattlesnake grass	
Brassica nigra	black mustard	
Brassica rapa	field mustard	
Bromus catharticus	rescue grass	None
Bromus diandrus	ripgut brome	Moderate
Bromus hordeaceus	soft chess	
Bromus madritensis ssp. rubens	red brome	High; No Alert
Cakile maritima	sea rocket	Low; No Alert
Camissonia cheiranthifolia ssp. cheiranthifolia	beach primrose	
Cardaria draba	hoary cress	
Carex sp.	sedge	
Carpobrotus chilensis	sea-fig	Medium; No Alert
Carpobrotus edulis	hottentot-fig	High; No Alert
Castilleja affinis	indian paintbrush	
Epilobium ciliatum	willow herb	
Chorizanthe angustifolia	narrowleaf spineflower	
Cirsium occidentale	western thistle	
Cirsium vulgare	bull thistle	Medium; No Alert
Conicosia pugioniformis	pig root	Low; No Alert
Conium maculatum	poison hemlock	Medium; No Alert
Conyza canadensis	horseweed	
Coreopsis gigantea	giant coreopsis	
Corethrogyne filaginifolia	cudweed aster	
Cortaderia selloana	pampas grass	High; No Alert
Cryptantha leiocarpa	coastal cryptantha	
Cynodon dactylon	Bermuda grass	Moderate; No Alert
Daucus pusillus	rattlesnake weed	I Pale Alast
Delairea odorata	German ivy, cape ivy	High; No Alert
Distichlis spicata	salt grass sand-lettuce	
Dudleya caespitosa		
Ehrharta calycina Eschscholzia californica	veldt grass	
Eschscholzia californica Epilobium ciliatum	California poppy willow herb	
Ericameria ericoides	mock heather, heather goldenbush	
Erigeron blochmaniae	Blochman's leafy daisy	CNPS List 1B
	seacliff buckwheat	CINE O LIST ID
Eriogonum parvifolium Eriophyllum confertiflorum	golden varrow	
Eriophyllum staechadifolium	seaside woolly sunflower	
Erodium cicutarium	red-stem filaree, afilerillo	Limited
Erysimum insulare ssp. suffrutescens	dune wallflower	CNPS List 4
Euthamia occidentalis	western goldenrod	OH O LIST T
Foeniculum vulgare	fennel	High; No Alert
Fragaria chiloensis	beach strawberry	
Galium aparine	cleavers	
Gnaphalium bicolor	bicolored everlasting	
Gnaphalium californicum	green everlasting	
Gnaphalium ramosissimum	pink everlasting	
Hedera canariensis	Algerian ivy	
Helenium puberulum	sneezeweed	
Hesperocnide tenella	western nettle	
Heterotheca grandiflora	telegraph weed	
Hirschfeldia incana	short-podded mustard	Medium; No Alert

### Plant Species Observed 2005-2006 Oso Flaco

Scientific Name	Common Name	Special Status
Hordeum murinum	foxtail	Moderate
Horkelia cuneata ssp. cuneata	wedge-leaf horkelia	
Hydrocotyle verticillata	whorled marsh pennywort	
Jaumea carnosa	iumea	
Juncus aff. textilis	indian rush	
Juncus lesueurii	dune rush	
Lemna sp.	duckweed	
Leymus condensatus	giant rye	
Loeflingia squarrosa	J	
Lolium multiflorum	Italian rye	
Lonicera involucrata var. ledebourii	twinberry	
Lotus heermannii var. orbicularis	prostrate deerweed	
Lotus scoparius var. scoparius	deerweed	
Lupinus chamissonis	silver dune lupine	
Malacothrix incana	dunedelion	CNPS List 4
Medicago polymorpha	burclover	5111 5 Elot 1
Melilotus indicus	yellow sweetclover	
Monardella crispa	crisp monardella	CNPS List 1B
Morella [Myrica] californica	Pacific wax-myrtle	OTT O LIST TE
Nemacaulis denudata var. denudata	coast woolly-heads	CNPS List 1B/Range Extension
Oenanthe sarmentosa	water parsley	ON S LIST IB/INAINGE Extension
Oenothera elata ssp. hookeri	Hooker's evening primrose	
Orobanche californica ssp. grandis	California broomrape	
Pentagramma triangularis	silverback fern	
Phacelia ramosissima	branching phacelia	
Picris echioides	bristly ox tongue	Low; No Alert
Polygonum punctatum	dotted smartweed	Low, No Alert
Polypogon monspeliensis	rabbits-foot grass	
Populus balsamifera ssp. trichocarpa	black cottonwood	
Potentilla anserina ssp. tricriocarpa  Potentilla anserina ssp. pacifica	silverweed	
Raphanus sativus	wild radish	Limited
Ribes divaricatum var. pubiflorum	straggly gooseberry	Limited
Ribes sanguineum var. glutinosum	pink-flowered current	
Rorippa palustris var. occidentalis	marsh cress	
Rubus ursinus		
	western blackberry	
Rumex conglomeratus	green dock curly dock	
Rumex crispus	,	
Salix lasiolepis	arroyo willow	
Scirpus californicus	California bulrush	
Scirpus cernuus	low clubrush	
Scirpus microcarpus	panicled bulrush	CNIDC List 4
Selenum emericanum	Blochman's groundsel	CNPS List 4
Solanum americanum	small-flowered nightshade	
Solanum douglasii	Douglas' nightshade	
Solidago confinis	southern goldenrod	Evaluated history listed
Sonchus asper	prickly sow-thistle	Evaluated, but not listed
Sonchus oleraceus	common sow-thistle	None
Toxicodendron diversilobum	western poison-oak	
Urtica dioica ssp. holosericea	giant creek nettle	
Urtica urens	dwarf nettle	M. J.
Vulpia myuros var. hirsuta	foxtail fescue	Moderate
Yabea microcarpa	California hedge parsley	
¹Range extension		

Non native or Invasive Species with California Invasive Plant Council (IPC) rating
Special Status

U.S.Fish and Wildlife Service (USFWS)
FE: Federally Endangered
FT: Federally Threatened

## California Department of Fish and Game (CDFG)

CE: California Endangered CT: California Threatened

<u>California Native Plant Society (CNPS)</u> <u>List 1B: Plants rare, threatened, or endangered in</u> California and elsewhere

List 4: Plants of limited distribution- a watch list

## Plant Species Observed 2005-2006 Little Oso Flaco

Scientific Name	Common Name	Special Status
Achillea millefolium	yarrow	
Amaranthus sp.	pigweed	
Ambrosia chamissonis	silver beach weed, beach bur	
Amsinckia menziesii ssp. intermedia	fiddleneck	
Anagallis arvensis	scarlet pimpernel	
Artemisia dracunculus	tarragon	
Artemisia douglasiana	mugwort	
Baccharis pilularis	coyote brush	
Brassica rapa	field mustard	
Brassica tournefortii	Asian mustard	High; No Alert
Bromus catharticus	rescue grass	
Bromus diandrus	ripgut brome	Moderate
Bromus madritensis ssp. rubens	red brome	High; No Alert
Camissonia intermedia	sun cups	
Capsella bursa-pastoris	Shepherd's-purse	
Cardaria draba	hoary cress	
Cardionema ramosissimum	sandmat	
Carex sp.		
Castilleja affinis ssp. affinis	indian paintbrush	
Chenopodium californicum	soap root	
Chenopodium sp.		
Chorizanthe angustifolia	narrowleaf spineflower	
Cirsium californicum	California thistle	
Conicosia pugioniformis	pig root	Low; No Alert
Conium maculatum	poison hemlock	
Corethrogyne filaginifolia	cudweed aster	
Croton californicus	California croton	
Cryptantha clevelandii	common cryptantha	
Descurainia pinnata	western tansy mustard	
Dudleya caespitosa	sand-lettuce	
Ehrharta calycina	purple veldt grass	High, Alert
Epilobium ciliatum	willow herb	
Equisetum telmateia ssp. braunii	giant horsetail	
Ericameria ericoides	mock heather, heather goldenbush	
Eriogonum parvifolium	seacliff buckwheat	
Erodium cicutarium	redstem filaree, afilerillo	
Erysimum insulare ssp. suffrutescens	dune wallflower	CNPS List 4
Galium californicum?	California bedstraw	
Heliotropium curassavicum	heliotrope	
Hesperocnide tenella	western nettle	
Hirschfeldia incana	short-podded mustard	Medium; No Alert
Horkelia cuneata ssp. cuneata	wedge-leaf horkelia	
Hydrocotyle verticillata	whorled marsh pennywort	
Lastarriaea coriacea	spineflower	
Layia hieracioides	tall layia	
Lepidium didydum	wart cress	
Loeflingia squarrosa	California loeflingia	
Lupinus chamissonis	silver dune lupine	
Malva parviflora	cheeseweed	
Melica imperfecta	coast range melic	
Mucronea californica	California spineflower	CNPS List 4
Oenanthe sarmentosa	water parsley	
Phacelia ramosissima	branching phacelia	
Picris echioides	bristly ox tongue	Limited
Poa annua	annual bluegrass	None
Polygonum arenastrum	common knotweed	
Polypogon monspeliensis	rabbits-foot grass	
Portulaca oleracea	purslane	

## Plant Species Observed 2005-2006 Little Oso Flaco

Scientific Name	Common Name	Special Status
Pterostegia drymarioides	fairy mist	
Rhamnus californica	coffeeberry	
Rubus ursinus	western blackberry	
Salix lasiolepis	arroyo willow	
Scirpus californicus	California bulrush	
Senecio blochmaniae	Blochman's groundsel	CNPS List 4
Sonchus oleraceus	common sow-thistle	None
Stephanomeria sp.	wire-lettuce	
Toxicodendron diversilobum	western poison-oak	
Typha latifolia	broad-leaved cattail	
Urtica dioica ssp. holosericea	giant creek nettle	
Verbena lasiostachys var. lasiostachys	western vervain	
Vulpia myuros var. hirsuta	foxtail fescue	Moderate

Non-native or Invasive Species with California Invasive Plant Council (IPC) rating
California Native Plant Society Status

#### KEY

## U.S.Fish and Wildlife Service (USFWS)

**FE:** Federally Endangered **FT:** Federally Threatened

# California Department of Fish and Game (CDFG)

**CE:** California Endangered **CT:** California Threatened

## California Native Plant Society (CNPS)

**List 1B:** Plants rare, threatened, or endangered in California and elsewhere

List 4: Plants of limited distribution- a watch list

# Special Status and Endemic Plants Observed at Oceano Dunes SVRA 2005-2006

Scientific Name	Common Name	Special Status
Chorizanthe angustifolia	narrowleaf spineflower	Endemic
Abronia maritima	sticky sand-verbena	CNPS List 4
Astragalus nuttallii var. nuttallii	Nuttall's locoweed	CNPS List 4
Delphinium parishii ssp . blochmaniae	dune larkspur	CNPS List 1B/Endemic
Erigeron blochmaniae	Blochman's leafy daisy	CNPS List 1B/Endemic
Erysimum insulare ssp. suffrutescens	dune wallflower	CNPS List 4/Endemic
Lupinus nipomensis	Nipomo Mesa Iupine	FE/CE/CNPS List 1B/Endemic
Malacothrix incana	dunedelion	CNPS List 4
Monardella crispa	crisp monardella	CNPS List 1B/Endemic
Monardella frutescens	San Luis Obispo monardella	CNPS List 1B/Endemic
Mucronea californica	California spineflower	CNPS List 4
Nemacaulis denudata var. denudata	coast woolly-heads	CNPS List 1B/Range Extension
Orobanche californica ssp. grandis	California broomrape	Endemic
Prunus fasciculata var. punctata	sand almond	CNPS List 4/Endemic
Senecio blochmaniae	Blochman's groundsel	CNPS List 4/Endemic
Tota	ıl .	15

Total Plant Taxa Observed	280
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IDENT	Scientific Name	Common Name	LAT	LONG	DATE	ALTITUDE
097	Astragalus nuttallii var. nuttallii	Nuttall's locoweed	35.03093753	-120.62517646	09-JUN-06 14:33	12.00
033	Delphinium parshii ssp. blochmaniae	dune larkspur	35.03711013	-120.60007459	17-MAY-06 13:42	39.00
020	Erigeron blochmaniae	Blochman's leafy daisy	35.03639105	-120.59600391	17-MAY-06 12:04	52.00
024	Erigeron blochmaniae	Blochman's leafy daisy	35.03650655	-120.59839921	17-MAY-06 13:12	32.00
025	Erigeron blochmaniae	Blochman's leafy daisy	35.03652642	-120.59833442	17-MAY-06 13:12	30.00
026	Erigeron blochmaniae	Blochman's leafy daisy	35.03651259	-120.59817022	17-MAY-06 13:13	31.00
027	Erigeron blochmaniae	Blochman's leafy daisy	35.03650630	-120.59812093	17-MAY-06 13:13	32.00
029	Erigeron blochmaniae	Blochman's leafy daisy	35.03650546	-120.59878503	17-MAY-06 13:28	30.00
033	Erigeron blochmaniae	Blochman's leafy daisy	35.03168117	-120.62313161	09-JUN-06 11:41	19.00
034	Erigeron blochmaniae	Blochman's leafy daisy	35.03169911	-120.62314100	09-JUN-06 11:41	19.00
036	Erigeron blochmaniae	Blochman's leafy daisy	35.03168176	-120.62396200	09-JUN-06 11:43	10.00
038	Erigeron blochmaniae	Blochman's leafy daisy	35.03165284	-120.62431689	09-JUN-06 11:52	31.00
041	Erigeron blochmaniae	Blochman's leafy daisy	35.03171017	-120.62441647	09-JUN-06 11:55	26.00
045	Erigeron blochmaniae	Blochman's leafy daisy	35.03186616	-120.62636132	09-JUN-06 12:34	41.00
047	Erigeron blochmaniae	Blochman's leafy daisy	35.03208376	-120.62630340	09-JUN-06 12:38	46.00
049	Erigeron blochmaniae	Blochman's leafy daisy	35.03203481	-120.62641371	09-JUN-06 12:40	39.00
051	Erigeron blochmaniae	Blochman's leafy daisy	35.03196138	-120.62649166	09-JUN-06 12:41	36.00
054	Erigeron blochmaniae	Blochman's leafy daisy	35.03187689	-120.62634179	09-JUN-06 12:44	32.00
055	Erigeron blochmaniae	Blochman's leafy daisy	35.03208853	-120.62704923	09-JUN-06 12:57	24.00
073	Erigeron blochmaniae	Blochman's leafy daisy	35.03407622	-120.62944570	09-JUN-06 13:24	11.00
076	Erigeron blochmaniae	Blochman's leafy daisy	35.03421905	-120.62937747	09-JUN-06 13:25	10.00
078	Erigeron blochmaniae	Blochman's leafy daisy	35.03426112	-120.62932584	09-JUN-06 13:26	11.00
080	Erigeron blochmaniae	Blochman's leafy daisy	35.03428778	-120.62942181	09-JUN-06 13:27	11.00
088	Erigeron blochmaniae	Blochman's leafy daisy	35.09544373	-120.62810308	17-APR-06 14:11	2.00
089	Erigeron blochmaniae	Blochman's leafy daisy	35.09538883	-120.62766161	17-APR-06 14:13	-7.00
090	Erigeron blochmaniae	Blochman's leafy daisy	35.09450362	-120.62630123	17-APR-06 14:29	-7.00
092	Erigeron blochmaniae	Blochman's leafy daisy	35.09435677	-120.62585975	17-APR-06 14:35	-5.00
100	Erigeron blochmaniae	Blochman's leafy daisy	35.03055925	-120.62408648	09-JUN-06 14:36	4.00
104	Erigeron blochmaniae	Blochman's leafy daisy	35.03051139	-120.62382295	09-JUN-06 14:39	12.00
ERBL01	Erigeron blochmaniae	Blochman's leafy daisy	35.03732000	-120.60512000	07-SEP-05	0.00
ERBL02	Erigeron blochmaniae	Blochman's leafy daisy	35.03669000	-120.59896000	07-SEP-05	0.00
090	Erigeron bolchmaniae	Blochman's leafy daisy	35.09450362	-120.62630123	17-APR-06 14:29	-7.00
092	Erigeron bolchmaniae	Blochman's leafy daisy	35.09435677	-120.62585975	17-APR-06 14:35	-5.00
009	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03996618	-120.59658143	17-MAY-06 11:03	41.00
010	Erysimum insulare ssp. suffrutescens	dune wallflower	35.04003357	-120.59663499	17-MAY-06 11:06	37.00
014	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03940401	-120.59658696	17-MAY-06 11:37	41.00
018	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03170204	-120.62087721	09-JUN-06 11:20	14.00
019	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03168947	-120.62086154	09-JUN-06 11:20	17.00
028	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03149526	-120.62111476	09-JUN-06 11:31	16.00
029	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03165469	-120.62195202	09-JUN-06 11:35	19.00
041	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03765529	-120.60042252	17-MAY-06 14:11	30.00
050	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03201134	-120.62642813	09-JUN-06 12:40	38.00
052	Erysimum insulare ssp. suffrutescens	dune wallflower	35.04045141	-120.61215173	17-MAY-06 15:13	57.00
052	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03183515	-120.62645570	09-JUN-06 12:42	37.00
053	Erysimum insulare ssp. suffrutescens	dune wallflower	35.04046096	-120.61215467	17-MAY-06 15:13	52.00

IDENT	Scientific Name	Common Name	LAT	LONG	DATE	ALTITUDE
054	Erysimum insulare ssp. suffrutescens	dune wallflower	35.04070018	-120.61287593	17-MAY-06 15:22	39.00
056	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03220948	-120.62758625	09-JUN-06 12:59	23.00
057	Erysimum insulare ssp. suffrutescens	dune wallflower	35.04106748	-120.61316703	17-MAY-06 15:25	47.00
058	Erysimum insulare ssp. suffrutescens	dune wallflower	35.04111702	-120.61300937	17-MAY-06 15:35	46.00
073	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03978765	-120.59575204	23-MAR-06 11:20	47.00
080	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03784573	-120.60341360	23-MAR-06 13:41	36.00
083	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03286210	-120.62943170	09-JUN-06 13:43	9.00
089	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03194680	-120.62753471	09-JUN-06 14:23	7.00
090	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03200664	-120.62753932	09-JUN-06 14:24	-1.00
105	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03647311	-120.60677516	09-JUN-06 15:45	94.00
107	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03649632	-120.60679427	09-JUN-06 15:47	88.00
109	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03648903	-120.60671129	09-JUN-06 15:48	81.00
111	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03651032	-120.60659956	09-JUN-06 15:49	77.00
113	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03672507	-120.60665220	09-JUN-06 15:51	69.00
115	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03674418	-120.60672043	09-JUN-06 15:53	69.00
116	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03688298	-120.60680852	09-JUN-06 15:55	62.00
118	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03704039	-120.60680752	09-JUN-06 15:56	60.00
121	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03732806	-120.60681975	09-JUN-06 16:00	56.00
123	Erysimum insulare ssp. suffrutescens	dune wallflower	35.03752009	-120.60682571	09-JUN-06 16:01	58.00
022	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03651418	-120.59606929	17-MAY-06 12:07	53.00
022	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03651418	-120.59606929	17-MAY-06 12:07	53.00
023	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03658769	-120.59678033	17-MAY-06 12:24	47.00
031	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03674594	-120.59988876	17-MAY-06 13:35	48.00
034	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03716595	-120.60037005	17-MAY-06 13:45	34.00
044	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03746133	-120.59990829	17-MAY-06 14:19	38.00
045	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03743099	-120.59990552	17-MAY-06 14:19	39.00
046	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03726972	-120.59972892	17-MAY-06 14:21	44.00
047	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03716411	-120.59958902	17-MAY-06 14:23	45.00
076	Lupinus nipomoensis	Nipomo Mesa Iupine	35.03661484	-120.59942239	23-MAR-06 12:56	49.00
015	Monardella crispa	crisp monardella	35.03163583	-120.62083463	09-JUN-06 11:18	17.00
016	Monardella crispa	crisp monardella	35.03170121	-120.62091300	09-JUN-06 11:19	15.00
017	Monardella crispa	crisp monardella	35.03167832	-120.62091485	09-JUN-06 11:19	15.00
043	Mucronea californica	California spineflower	35.03762755	-120.60025195	17-MAY-06 14:17	30.00
063	Nemacaulis denudata	coast woolly-heads	35.03349083	-120.62939113	09-JUN-06 13:08	11.00
064	Nemacaulis denudata	coast woolly-heads	35.03348102	-120.62939272	09-JUN-06 13:12	12.00
067	Nemacaulis denudata	coast woolly-heads	35.03370632	-120.62938049	09-JUN-06 13:18	8.00
069	Nemacaulis denudata	coast woolly-heads	35.03371923	-120.62944796	09-JUN-06 13:20	9.00
072	Nemacaulis denudata	coast woolly-heads	35.03396499	-120.62948685	09-JUN-06 13:23	11.00
074	Nemacaulis denudata	coast woolly-heads	35.03407001	-120.62943731	09-JUN-06 13:24	8.00
075	Nemacaulis denudata	coast woolly-heads	35.03423757	-120.62946581	09-JUN-06 13:25	11.00
002	Prunus fasciculata var. punctata	sand almond	35.04098584	-120.59589637	17-MAY-06 10:10	135.00
007	Prunus fasciculata var. punctata	sand almond	35.03977306	-120.59599352	17-MAY-06 10:34	49.00
007	Prunus fasciculata var. punctata	sand almond	35.03977306	-120.59599352	17-MAY-06 10:34	49.00
016	Prunus fasciculata var. punctata	sand almond	35.03782226	-120.59549178	17-MAY-06 11:46	51.00
032	Prunus fasciculata var. punctata	sand almond	35.03702195	-120.60026636	17-MAY-06 13:38	45.00

IDENT	Scientific Name	Common Name	LAT	LONG	DATE	ALTITUDE
035	Prunus fasciculata var. punctata	sand almond	35.03716428	-120.60028690	17-MAY-06 13:46	30.00
003	Senecio blochmaniae	Blochman's groundsel	35.04067034	-120.59628814	17-MAY-06 10:13	71.00
004	Senecio blochmaniae	Blochman's groundsel	35.04047329	-120.59590618	17-MAY-06 10:29	75.00
005	Senecio blochmaniae	Blochman's groundsel	35.04076690	-120.59575791	17-MAY-06 10:32	77.00
006	Senecio blochmaniae	Blochman's groundsel	35.04062860	-120.59579009	17-MAY-06 10:32	71.00
009	Senecio blochmaniae	Blochman's groundsel	35.03583516	-120.60668539	09-JUN-06 11:03	-22.00
010	Senecio blochmaniae	Blochman's groundsel	35.03583516	-120.60668539	09-JUN-06 11:04	-24.00
011	Senecio blochmaniae	Blochman's groundsel	35.03092538	-120.62057538	09-JUN-06 11:04	-19.00
012	Senecio blochmaniae	Blochman's groundsel	35.03954491	-120.59675862	17-MAY-06 11:33	52.00
012	Senecio blochmaniae	Blochman's groundsel	35.03100174	-120.62055795	09-JUN-06 11:05	-15.00
013	Senecio blochmaniae	Blochman's groundsel	35.03946980	-120.59671973	17-MAY-06 11:35	51.00
013	Senecio blochmaniae	Blochman's groundsel	35.03156265	-120.62067429	09-JUN-06 11:05	20.00
015	Senecio blochmaniae	Blochman's groundsel	35.03929697	-120.59686692	17-MAY-06 11:41	59.00
017	Senecio blochmaniae	Blochman's groundsel	35.03685147	-120.59554492	17-MAY-06 11:50	58.00
019	Senecio blochmaniae	Blochman's groundsel	35.03677737	-120.59547334	17-MAY-06 11:52	58.00
020	Senecio blochmaniae	Blochman's groundsel	35.03168528	-120.62089557	09-JUN-06 11:22	9.00
021	Senecio blochmaniae	Blochman's groundsel	35.03171654	-120.62095751	09-JUN-06 11:24	15.00
022	Senecio blochmaniae	Blochman's groundsel	35.03168453	-120.62099691	09-JUN-06 11:24	17.00
023	Senecio blochmaniae	Blochman's groundsel	35.03156517	-120.62096388	09-JUN-06 11:25	15.00
024	Senecio blochmaniae	Blochman's groundsel	35.03154086	-120.62086665	09-JUN-06 11:26	18.00
027	Senecio blochmaniae	Blochman's groundsel	35.03167237	-120.62120411	09-JUN-06 11:29	16.00
029	Senecio blochmaniae	Blochman's groundsel	35.03650546	-120.59878503	17-MAY-06 13:28	30.00
032	Senecio blochmaniae	Blochman's groundsel	35.03164513	-120.62272467	09-JUN-06 11:39	28.00
035	Senecio blochmaniae	Blochman's groundsel	35.03177036	-120.62378909	09-JUN-06 11:42	9.00
036	Senecio blochmaniae	Blochman's groundsel	35.03726662	-120.60044171	17-MAY-06 13:48	34.00
037	Senecio blochmaniae	Blochman's groundsel	35.03726981	-120.60079526	17-MAY-06 13:50	30.00
038	Senecio blochmaniae	Blochman's groundsel	35.03720728	-120.60094555	17-MAY-06 13:51	28.00
039	Senecio blochmaniae	Blochman's groundsel	35.03162066	-120.62427096	09-JUN-06 11:52	22.00
040	Senecio blochmaniae	Blochman's groundsel	35.03759352	-120.60040601	17-MAY-06 14:09	31.00
040	Senecio blochmaniae	Blochman's groundsel	35.03171554	-120.62442795	09-JUN-06 11:55	26.00
042	Senecio blochmaniae	Blochman's groundsel	35.03185594	-120.62633366	09-JUN-06 12:31	43.00
043	Senecio blochmaniae	Blochman's groundsel	35.03181252	-120.62629368	09-JUN-06 12:32	45.00
046	Senecio blochmaniae	Blochman's groundsel	35.03182936	-120.62642637	09-JUN-06 12:36	40.00
048	Senecio blochmaniae	Blochman's groundsel	35.03207051	-120.62630433	09-JUN-06 12:38	48.00
049	Senecio blochmaniae	Blochman's groundsel	35.04036625	-120.61202131	17-MAY-06 15:10	58.00
050	Senecio blochmaniae	Blochman's groundsel	35.04041864	-120.61209876	17-MAY-06 15:12	57.00
051	Senecio blochmaniae	Blochman's groundsel	35.04046088	-120.61214235	17-MAY-06 15:12	58.00
053	Senecio blochmaniae	Blochman's groundsel	35.03183750	-120.62646375	09-JUN-06 12:42	35.00
055	Senecio blochmaniae	Blochman's groundsel	35.04069901	-120.61286981	17-MAY-06 15:22	45.00
056	Senecio blochmaniae	Blochman's groundsel	35.04068946	-120.61286671	17-MAY-06 15:22	43.00
060	Senecio blochmaniae	Blochman's groundsel	35.03336669	-120.62911972	09-JUN-06 13:05	10.00
062	Senecio blochmaniae	Blochman's groundsel	35.03349158	-120.62931318	09-JUN-06 13:06	8.00
065	Senecio blochmaniae	Blochman's groundsel	35.03365159	-120.62958769	09-JUN-06 13:17	10.00
066	Senecio blochmaniae	Blochman's groundsel	35.03368679	-120.62947352	09-JUN-06 13:17	12.00
068	Senecio blochmaniae	Blochman's groundsel	35.03363156	-120.62937286	09-JUN-06 13:19	10.00

IDENT	Scientific Name	Common Name	LAT	LONG	DATE	ALTITUDE
070	Senecio blochmaniae	Blochman's groundsel	35.03374128	-120.62946682	09-JUN-06 13:20	10.00
079	Senecio blochmaniae	Blochman's groundsel	35.03426414	-120.62933598	09-JUN-06 13:26	7.00
082	Senecio blochmaniae	Blochman's groundsel	35.03451115	-120.62933799	09-JUN-06 13:30	12.00
091	Senecio blochmaniae	Blochman's groundsel	35.09434244	-120.62587484	17-APR-06 14:34	-3.00
093	Senecio blochmaniae	Blochman's groundsel	35.09436557	-120.62581600	17-APR-06 14:35	-1.00
094	Senecio blochmaniae	Blochman's groundsel	35.09426725	-120.62568340	17-APR-06 14:38	-3.00
094	Senecio blochmaniae	Blochman's groundsel	35.03118739	-120.62581625	09-JUN-06 14:31	13.00
095	Senecio blochmaniae	Blochman's groundsel	35.03099713	-120.62532390	09-JUN-06 14:32	13.00
096	Senecio blochmaniae	Blochman's groundsel	35.03097332	-120.62535985	09-JUN-06 14:32	16.00
098	Senecio blochmaniae	Blochman's groundsel	35.03091146	-120.62516363	09-JUN-06 14:33	11.00
099	Senecio blochmaniae	Blochman's groundsel	35.03069571	-120.62479516	09-JUN-06 14:35	8.00
101	Senecio blochmaniae	Blochman's groundsel	35.03056043	-120.62409008	09-JUN-06 14:36	10.00
102	Senecio blochmaniae	Blochman's groundsel	35.03057518	-120.62398958	09-JUN-06 14:36	9.00
103	Senecio blochmaniae	Blochman's groundsel	35.03053344	-120.62384139	09-JUN-06 14:39	7.00
106	Senecio blochmaniae	Blochman's groundsel	35.03650001	-120.60684289	09-JUN-06 15:47	90.00
108	Senecio blochmaniae	Blochman's groundsel	35.03648115	-120.60671708	09-JUN-06 15:48	85.00
112	Senecio blochmaniae	Blochman's groundsel	35.03660219	-120.60666796	09-JUN-06 15:50	71.00
114	Senecio blochmaniae	Blochman's groundsel	35.03672029	-120.60669579	09-JUN-06 15:52	71.00
120	Senecio blochmaniae	Blochman's groundsel	35.03717417	-120.60683325	09-JUN-06 15:58	57.00
122	Senecio blochmaniae	Blochman's groundsel	35.03746829	-120.60683166	09-JUN-06 16:01	56.00
125	Senecio blochmaniae	Blochman's groundsel	35.03740995	-120.60682596	09-JUN-06 16:03	57.00
126	Senecio blochmaniae	Blochman's groundsel	35.03724567	-120.60679863	09-JUN-06 16:04	52.00
127	Senecio blochmaniae	Blochman's groundsel	35.03720141	-120.60681766	09-JUN-06 16:04	52.00
128	Senecio blochmaniae	Blochman's groundsel	35.03655927	-120.60665631	09-JUN-06 16:06	50.00
129	Senecio blochmaniae	Blochman's groundsel	35.03605460	-120.60716366	09-JUN-06 16:11	60.00

# Master Wildlife Species List 2006

Scientific Name	Common Nama	Special Status
INVERTEBRATES*	Common Name	Special Status
Helminthoglypta fieldi	Surf Shoulderband	
Helminthoglypta umbilicata	Big Sur Shoulderband	
Coelus ciliatus	Ciliate Dune Beetle	
undetermined	Millipede	
Camponotus sp.	Harvester Ant	
Formica sp.	Mound-building ant	
undetermined	Ant	
undetermined	Crayfish, Crawdad	Non-native
Plebejus icarioides moroensis	Morro Boisduval's Blue	Endemic
Total	9	
AMPHIBIANS	D 17 T	
Hyla regilla	Pacific Tree Frog	Fadaral Threater ad California Cassics of
Rana draytonii	California Red-legged Frog	Federal Threatened/ California Species of Special Concern
Rana catesbeiana Total	Bullfrog 3	Non-native
REPTILES	3	
Clemmys marmorata pallida	Southwestern Pond Turtle	California Species of Special Concern
Uta stansburiana	Side-blotched Lizard	Camornia opecies of opecial concern
Phrynosoma coronatum frontale	California Horned Lizard	California Species of Special Concern
Sceloporus occidentalis	Western Fence Lizard	
Anniella pulchra pulchra	Silvery Legless Lizard	California Species of Special Concern
Elgaria m. multicarinata	California Alligator Lizard	
Pituphis catenifer	Gopher Snake	
Thamnophis elegans terrestris	Coast Garter Snake	
Total	8	
BIRDS	- 10 1	
Podiceps nigricollis	Eared Grebe	
Podilymbus podiceps Phalacrocorac auritus	Pied-billed Grebe Double-crested Cormorant	California Chasics of Chasial Consorn
Ardea herodias	Great Blue Heron	California Species of Special Concern
Botaurus lentiginosus	American Bittern	
Butorides virescens	Green Heron	
Casmerodius albus	Great Egret	
Egretta thula	Snowy Egret	
Nycticorax nycticorax	Black-crowned Night Heron	
Cathartes aura	Turkey Vulture	
Accipiter cooperii	Cooper's Hawk	California Species of Special Concern
Anas cyanoptera	Cinnamon Teal	
Anas platyrhynchos	Mallard	
Anas strepera	Gadwall	
Bucephala albeola	Bufflehead	
Oxyura jamaicensis	Ruddy Duck	
Buteo lineatus	Red-shouldered Hawk	
Buteo jamaicensis	Red-tailed Hawk	
Circus cyaneus	Northern Harrier	California Species of Special Concern
Falco sparverius	American Kestrel	
Callipepla californica Fulica americana	California Quail American Coot	
Porzana carolina	Sora	
Charadrius alexandrinus	Western Snowy Plover	Federal Threatened/California Species of Special Concern
Charadrius vociferus	Killdeer	орена описет
Numenius phaeopus	Whimbrel	
Phalarope fulicarius	Red-necked Phalarope	
Calidris alba	Sanderling	
Larus occidentalis	Western Gull	Entered 120 mg
Sterna antillarum	California Least Tern	Federal Threatened/California Endangered/Species of Special Concern
Sterna caspia	Caspian Tern	
Calidris mauri	Western Sandpiper	
Calidris alba	Sanderling	
Catoptrophorus semipalmatus	Willet	
Columba livia Zenaida macroura	Rock Pigeon	
	Mourning Dove Burrowing Owl	California Species of Special Concern
Athene cunicularia Bubo virginianus	Great Horned Owl	California Species of Special Concern
Patagioenas fasciata	Band-tailed Pigeon	
Aeronautes saxatalis	White-throated Swift	
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# Master Wildlife Species List 2006

Scientific Name	Common Name	Special Status
BIRDS CONTINUED	Common Name	Special Status
Archilochus alexandri	Black-chinned Hummingbird	
Calypte anna	Anna's Hummingbird	
Selasphorus sasin	Allen's Hummingbird	
Ceryle alcyon	Belted Kingfisher	
Colaptes auratus	Northern Flicker	
Melanerpes formicivorus	Acorn Woodpecker	
Picoides nuttallii	Nuttall's Woodpecker	
Picoides pubescens Picoides villosus	Downy Woodpecker Hairy Woodpecker	
Empidonax difficilis	Pacific-slope Flycatcher	
Sayornis nigricans	Black Phoebe	
Sayornis saya	Say's Phoebe	
Myiachus cinerascens	Ash-throated Flycatcher	
Tyrannus verticalis	Western Kingbird	
Lanius Iudovicianus	Loggerhead Shrike Warbling Vireo	California Species of Special Concern
Vireo gilvus Aphelocoma californica	Western Scrub Jay	
Corvus brachyrhynchos	American Crow	
Corvus corax	Common Raven	
Eremophila alpestris	Horned Lark	
Hirundo rustica	Barn Swallow	
Petrochelidon pyrrhonota	Cliff Swallow	
Baeolophus inornatus Stelaidopteryx serripennis	Oak Titmouse  Northern Rough-winged Swallow	
Tachycineta bicolor	Tree Swallow	
Psaltriparus minimus	Bushtit	
Poecile rufescens	Chestnut-backed Chickadee	
Baeolophus inornatus	Oat Titmouse	
Sitta carolinensis	White-breasted Nuthatch	
Cistothorus palustris	Marsh Wren Bewick's Wren	
Thryomanes bewickii Troglodytes aedon	House Wren	
Regulus calendula	Ruby-crowned Kinglet	
Polioptila caerulea	Blue-gray Gnatcatcher	
Turdus migratorius	American Robin	
Catharus ustulatus	Swainson's Thrush	
Sialia mexicana	Western Bluebird	
Chamaea fasciata Mimus polyglottos	Wrentit Northern Mockingbird	
Toxostoma redivivum	California Thrasher	
Sturnus vulgaris	European Starling	
Dendroica coronata	Yellow-rumped Warbler	
Dendroica nigrescens	Black-throated Gray Warbler	
Dendroica occidentalis	Hermit Warbler	California Canadian of Canadial Canadian
Dendroica petechia Dendroica townsendi	Yellow Warbler Townsend's Warbler	California Species of Special Concern
Geothlypis trichas	Common Yellowthroat	
Vermivora celata	Orange-crowned Warbler	
Wilsonia pusilla	Wilson's Warbler	
Piranga ludoviciana	Western Tanager	
Junco hyemalis	Dark-eyed Junco	
Melospiza melodia Passerculus sandwichensis	Song Sparrow Savannah Sparrow	
Pipilo crissalis	California Towhee	
Pipilo maculatus	Spotted Towhee	
Zonotrichia atricapilla	Golden-crowned Sparrow	
Zonotrichia leucophrys	White-crowned Sparrow	
Pheucticus melanocephalus	Black-headed Grosbeak	
Agelaius phoeniceus Sturnella neglecta	Red-winged Blackbird Western Meadowlark	
Euphagus cyanocephalus	Brewer's Blackbird	
Molothrus ater	Brown-headed Cowbird	
Carduelis psaltria	Lesser Goldfinch	
Molothrus ater	Brown-headed Cowbird	
Icterus bullockii	Bullock's Oriole	
Carpodacus purpureus	Purple Finch	
Carpodacus mexicanus	House Finch	
Carduelis lawrencei	Lawrence's Goldfinch	

# Master Wildlife Species List 2006

Scientific Name	Common Name	Special Status
BIRDS CONTINUED		
Carduelis tristis	American Goldfinch	
Passer domesticus	House Sparrow	
Total	110	
MAMMALS		
Scapanus latimanus	Broad-footed Mole	
Sylvilagus bachmani	Brush Rabbit	
Spermophilus beecheyi	California Ground Squirrel	
Castor canadensis	American Beaver	
Thomomys bottae	Botta's Pocket Gopher	
Neotoma macrotis	Large-eared Woodrat	
Rattus rattus	Black Rat	Non-native
Ondatra zibethicus	Common Muskrat	Non-native
Canis latrans	Coyote	
Urocyon cinereoargenteus	Common Gray Fox	
Procyon lotor	Northern Raccoon	
Mustela frenata	Long-tailed Weasel	
Taxidea taxus	American Badger	California Species of Special Concern
Mephitis mephitis	Striped Skunk	
Lynx rufus	Bobcat	
Puma concolor	Mountain Lion	
Odocoileus hemionus columbianus	Black Tailed Deer	
Total	17	

<sup>\*</sup> Invertebrates listed here represent only a very small fraction of the total number of species likely in the Park.

		Species			Habitat								
Order	Family	Scientific Name	Common Name	Speacial Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water			
INVERTEBRATES													
Xanthonychidae	Helminthoglyptidae	Helminthoglypta umbilicata	Big Sur Shoulderband				~						
Decapoda	Astacidae	undetermined	Crayfish						~	~			
Total Number		2											
AMPHIBIANS						1		1					
	Hylidae	Hyla regilla	Pacific Tree Frog							~			
Caudata	Ranidae	Rana draytonii	California Red-legged Frog	CT/SC					~	~			
		Rana catesbeiana	Bullfrog						~	~			
Total Number		3											
REPTILES		-											
Testudines	Emydidae	Clemmys marmorata pallida	Southwestern Pond Turtle	SC					~	~			
	Phrynosomatidae	Sceloporus occidentalis	Western Fence Lizard				~		~				
Squamata	Anguidae	Anniella pulchra pulchra	Silvery Legless Lizard	SC		~	~						
	Colubridae	Pituphis catenifer	Gopher Snake			~	~		~				
		Thamnophis elegans terrestris	Coast Garter Snake				~		~				
Total Number		5											
BIRDS	D. P. L. P. L.	De I'' est es es l'esces	Bir II illa I Cort					1					
Gaviiformes	Podicipedidae	Podilymbus podiceps	Pied-billed Grebe							<i>y</i>			
Pelicaniformes	Phalacrocoracidae	Phalacrocorac auritus	Double-crested Cormorant										
Ciconiiformes	Ardeidae	Ardea herodias	Great Blue Heron							<i>y</i>			
Ciconillornies	Cathartidae	Egretta thula	Snowy Egret			_	_	_					
	Camanidae	Cathartes aura	Turkey Vulture Mallard			_	<u> </u>	-					
Anseriformes	Anatidae	Anas platyrhynchos	Mallard Gadwall				-			~			
		Anas strepera  Buteo lineatus	Red-shouldered Hawk			_	_						
Falconiformes	Accipitridae		***************************************	_		-	-			<del>                                     </del>			
raiconiformes	Falconidae	Buteo jamaicensis	Red-tailed Hawk  American Kestrel			<u> </u>	<i>y</i>			<u> </u>			
Colliference		Falco sparverius											
Galliformes	Odontophoridae	Callipepla californica	California Quail				~		~	<u> </u>			

	Species				Habitat								
Order	Family	Scientific Name	Common Name	Speacial Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water			
Gruiformes	Rallidae	Fulica americana	American Coot							~			
Granornies	Railidae	Porzana carolina	Sora							~			
	Charadriidae	Charadrius alexandrinus	Western Snowy Plover	FT/SC	<b>~</b>	~		<b>~</b>					
	Oriaraurildae	Charadrius vociferus	Killdeer		~	>	>						
	Laridae	Sterna antillarum	California Least Tern	FT/CE/SC		~		~					
Charadiiformes	Landac	Sterna caspia	Caspian Tern		~								
	Scolopacidae	Calidris mauri	Western Sandpiper		~								
		Calidris alba	Sanderling		~								
		Catoptrophorus semipalmatus	Willet		~								
		Columba livia	Rock Pigeon			>	>		~				
Columbiformes	Columbidae	Zenaida macroura	Mourning Dove				>		~				
		Patagioenas fasciata	Band-tailed Pigeon						~				
	Apodidae	Aeronautes saxatalis	White-throated Swift			>	>		~				
Apodiformes		Archilochus alexandri	Black-chinned Hummingbird				>		~				
Apodilomics	Trochilidae	Calypte anna	Anna's Hummingbird				~		~				
		Selasphorus sasin	Allen's Hummingbird				>		~				
Coraciiformes	Alcedinidae	Ceryle alcyon	Belted Kingfisher						~	~			
		Colaptes auratus	Northern Flicker				~		~				
		Melanerpes formicivorus	Acorn Woodpecker				~		~				
Piciformes	Picidae	Picoides nuttallii	Nuttall's Woodpecker				~		~				
		Picoides pubescens	Downy Woodpecker				~		~				
		Picoides villosus	Hairy Woodpecker		•				~				

	Species						Habitat			
Order	Family	Scientific Name	Common Name	Speacial Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water
		Empidonax difficilis	Pacific -Slope Flycatcher						~	
	Tyrannidae	Sayornis nigricans	Black Phoebe						<b>~</b>	<b>&gt;</b>
	ryrannidae	Myiachus cinerascens	Ash-throated Flycatcher				>		<b>~</b>	
		Tyrannus verticalis	Western Kingbird						~	
	Vireonidae	Vireo huttoni	Hutton's Vireo						~	
	Vireoriidae	Vireo gilvus	Warbling Vireo						~	
		Aphelocoma californica	Western Scrub Jay			<b>\</b>	>		~	
	Corvidae	Corvus brachyrhynchos	American Crow		~	>	~		~	
		Corvus corax	Common Raven		<b>&gt;</b>	`	~	<b>&gt;</b>	<b>&gt;</b>	~
	Hirundinidae –	Hirundo rustica	Barn Swallow				>		~	~
		Petrochelidon pyrrhonota	Cliff Swallow				>		~	~
	Paridae	Poecile rufescens	Chestnut-backed Chickadee						<b>~</b>	
Passeriformes	Falluae	Baeolophus inornatus	Oak Titmouse				>		~	
rassemonnes	Aegithalidae	Psaltriparus minimus	Bushtit				>		~	
	Sittidae	Sitta carolinensis	White-breasted Nuthatch						<b>~</b>	
		Cistothorus palustris	Marsh Wren							~
	Troglodytidae	Thryomanes bewickii	Bewick's Wren				>		<b>~</b>	<b>&gt;</b>
		Troglodytes aedon	House Wren				>		<b>~</b>	
	Regulidae	Regulus calendula	Ruby-crowned Kinglet				>		~	
		Turdus migratorius	American Robin						<b>~</b>	
	Turdidae	Catharus ustulatus	Swainson's Thrush						<b>~</b>	
		Sialia mexicana	Western Bluebird						~	
	Timaliidae	Chamaea fasciata	Wrentit				~		~	
	Mimidae	Mimus polyglottos	Northern Mockingbird			~	~		~	
	Willilluae	Toxostoma redivivum	California Thrasher							
	Sturnidae	Sturnus vulgaris	European Starling			>	~		~	

	Species						Habitat								
Order	Family	Scientific Name	Common Name	Speacial Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water					
		Dendroica coronata	Yellow-rumped Warbler						~						
		Dendroica nigrescens	Black-throated Gray Warbler						~						
		Dendroica petechia	Yellow Warbler	SC					~						
	Parulidae	Dendroica townsendi	Townsend's Warbler						~						
		Geothlypis trichas	Common Yellowthroat						~						
		Vermivora celata	Orange-crowned Warbler						~						
		Wilsonia pusilla	Wilson's Warbler						~						
	Thraupidae	Piranga ludoviciana	Western Tanager						~						
		Junco hyemalis	Dark-eyed Junco						~						
		Melospiza melodia	Song Sparrow				~		~	~					
	Emberizidae	Passerculus sandwichensis	Savannah Sparrow			~	~								
Passeriformes	Lilibelizidae	Pipilo crissalis	California Towhee				>		~						
		Pipilo maculatus	Spotted Towhee				>		~						
		Zonotrichia leucophrys	White-crowned Sparrow				>								
	Cardinalidae	Pheucticus melanocephalus	Black-headed Grosbeak						~						
		Agelaius phoeniceus	Red-winged Blackbird						~	<b>&gt;</b>					
	Icteridae	Euphagus cyanocephalus	Brewer's Blackbird						~	>					
		Molothrus ater	Brown-headed Cowbird						~	>					
		Carpodacus purpureus	Purple Finch				~		~						
	Fringillidae	Carpodacus mexicanus	House Finch				>		~						
	i illigillidae	Carduelis psaltria	Lesser Goldfinch				>		~						
		Carduelis tristis	American Goldfinch				>		~						
<u> </u>	Passeridae	Passer domesticus	House Sparrow				~		~						
Total Number		82													

		Species			Habitat								
Order	Family	Scientific Name	Common Name	Speacial Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water			
MAMMALS													
Insectivora	Talpidae	Scapanus latimanus	Broad-footed Mole			~	~	~					
Lagomorpha	Leporidae	Sylvilagus bachmani	Brush Rabbit			~	<b>&gt;</b>		~				
	Sciuridae	Spermophilus beecheyi	California Ground Squirrel			~	<b>&gt;</b>		~				
	Castoridae	Castor canadensis	American Beaver						~	~			
Rodentia	Geomyidae	Thomomys bottae	Botta's Pocket Gopher				~						
Rodentia		Ondatra zibethicus	Common Muskrat							~			
	Muridae	Neotoma macrotis	Large-eared Woodrat				~		~				
		Rattus rattus	Black Rat				~		~	~			
	Canidae	Canis latrans	Coyote		~	~	~	~	~				
Carnivora	Carildae	Urocyon cinereoargenteus	Common Gray Fox				>		<b>&gt;</b>				
Garriivora	Procyonidae	Procyon lotor	Northern Raccoon		>	>	>	~	~				
	Felidae	Lynx rufus	Bobcat				`		~				

### Wildlife Species Observed in 2006 Creek Road, Ocean Street, and Silver Spur Place

		Species			arcial Status reline/Beach ated Foredunes getated Dunes per Sand) Riparian					
Order	Family	Scientific Name	Common Name	Speacial Status	Shoreline/Beach		Vegetated Backdunes	ed Dur Sand)	Riparian	Freshwater Marsh/Lake/Open Water
Artiodactyla	Cervidae	Odocoileus hemionus columbianus	Black-tailed Deer			~	~	~	~	
Total Number		13								

Total Species:	105
Total Observed first	
time in 2006	

Key

(I)

#### Site Specific Status Designations

O Observed

O\* Observed first time in 2004

E Expected Reference

U Unlikely California Wildlife Habitat Relationships System

SUN Status Uncertain

Introduced Special Status

Federal Listing

Seasonal Status Designations U.S. Fish and Wildlife Service

 RB
 Resident Breeder
 FE
 Endangered

 SV
 Summer Visitor
 FT
 Threatened

WV Winter Visitor

M Migrant State of California

 T
 Transient
 CE
 Endangered

 SUN
 Status Uncertain
 CT
 Threatened

 (I)
 Introduced
 SC
 Special Concern

#### Abundance Designations

A Abundant
C Common
U Uncommon
R Rare

### Non-native

## Wildlife Species Observed in 2006 ConocoPhillips

		Species					Habitat			
Order	Family	Scientific Name	Common Name	Special Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water
INVERTEBRATES										
Xanthonychidae	Helminthoglyptidae	Helminthoglypta fieldi	Surf Shoulderband				~			
		Camponotus sp.	Harvester Ant				~			
Hymenoptera	Forminaceae	Formica sp.	Mound-building ant				~			
		Undetermined	Ant				~			
Lepidoptera	Lycaenidae	Plebejus icarioides moroensis	Morro Boisduval's Blue	endemic			~			
Total Number		5								
AMPHIBIANS										
Anura	Ranidae	Rana draytonii	California Red-legged Frog	CT/SC			~		~	~
Total Number		1								
REPTILES										
Testudines	Emydidae	Clemmys marmorata pallida	Southwestern Pond Turtle	SC					~	~
	Phrynosomatidae	Phrynosoma coronatum frontale	California Horned Lizard	SC			~			
Squamata	Tillyllosomalado	Sceloporus occidentalis	Western Fence Lizard			~	~		~	
Oquamata	Anguidae	Anniella pulchra pulchra	Silvery Legless Lizard	SC		~	~			
	Aliguidae	Elgaria m. multicarinata	California Alligator Lizard				<b>&gt;</b>		~	
Total Number		5								
BIRDS										
Ciconiiformes	Ardeidae	Ardea herodias	Great Blue Heron						~	~
Clooriiiiorriico	Cathartidae	Cathartes aura	Turkey Vulture		~	~	~	~	~	
	Accipitridae	Accipiter cooperii	Cooper's Hawk	SC			~		~	
Falconiformes	7 tooipitridae	Buteo jamaicensis	Red-tailed Hawk			~	~			
	Falconidae	Falco sparverius	American Kestrel			~	~			
Galliformes	Odontophoridae	Callipepla californica	California Quail			~	~		~	
Charadiiformes	Columbidae	Charadrius alexandrinus	Western Snowy Plover	FT/SC	~					
Onaradinomies	Laridae	Sterna antillarum	California Least Tern	FT/CE/SC	~					~
Columbiformes	Columbidae	Columba livia	Rock Pigeon		~	~	~	>	~	
Columbilornies	Columbidae	Zenaida macroura	Mourning Dove		~	~	~	<b>&gt;</b>	~	
Strigiformes	Strigidae	Athene cunicularia	Burrowing Owl	SC			~			
Ottigilottics	otrigidae	Bubo virginianus	Great Horned Owl			~	<b>&gt;</b>		~	~

## Wildlife Species Observed in 2006 ConocoPhillips

	Species						Habitat								
Order	Family	Scientific Name	Common Name	Special Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water					
Apodiformes	Trochilidae	Calypte anna	Anna's Hummingbird			~	~		~						
Apodiloffies	Trocillidae	Selasphorus sasin	Allen's Hummingbird			>	>		~						
		Colaptes auratus	Northern Flicker			~	<b>\</b>		~						
Piciformes	Picidae	Picoides nuttallii	Nuttall's Woodpecker			~	~		~						
		Picoides pubescens	Downy Woodpecker						~						
	Turanidas	Sayornis nigricans	Black Phoebe				~		~	<b>&gt;</b>					
	Tyrannidae	Sayornis saya	Say's Phoebe				~		~						
	Laniidae	Lanius Iudovicianus	Loggerhead Shrike	SC			~		~	<b>&gt;</b>					
	Corvidae	Aphelocoma californica	Western Scrub Jay			~	~		~						
		Corvus brachyrhynchos	American Crow		~	~	~	~	~						
	Aegithalidae	Psaltriparus minimus	Bushtit				~		~						
	Paridae	Poecile rufescens	Chestnut-backed Chickadee						~						
		Baeolophus inornatus	Oak Titmouse				>		~						
	Tragladytidaa	Thryomanes bewickii	Bewick's Wren			~	<b>\</b>		~	<b>*</b>					
	Troglodytidae	Troglodytes aedon	House Wren						~						
	Regulidae	Regulus calendula	Ruby-crowned Kinglet				~		~						
Passeriformes	Sylviidae	Polioptila caerulea	Blue-gray Gnatcatcher			~	~								
	Timaliidae	Chamaea fasciata	Wrentit			~	<b>\</b>		~						
	Mimidae	Toxostoma redivivum	California Thrasher				<b>\</b>								
	Sturnidae	Sturnus vulgaris	European Starling		<b>&gt;</b>	~	<b>\</b>		~						
	Parulidae	Dendroica petechia	Yellow Warbler	SC					<b>&gt;</b>						
	Faiulidae	Geothlypis trichas	Common Yellowthroat				>		~	<b>&gt;</b>					
		Melospiza melodia	Song Sparrow				>		~	>					
		Passerculus sandwichensis	Savannah Sparrow				>								
	Emberizidae	Pipilo crissalis	California Towhee				>								
	EIIIDEIIZIUAE	Pipilo maculatus	Spotted Towhee				~								
		Zonotrichia atricapilla	Golden-crowned Sparrow				~								
		Zonotrichia leucophrys	White-crowned Sparrow				>								

## Wildlife Species Observed in 2006 ConocoPhillips

	Species						Habitat								
Order	Family	Scientific Name	Common Name	Special Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water					
		Agelaius phoeniceus	Red-winged Blackbird						>	~					
	Icteridae	Sturnella neglecta	Western Meadowlark				>	>							
	iciendae	Molothrus ater	Brown-headed Cowbird						>	<b>&gt;</b>					
		Icterus bullockii	Bullock's Oriole						>						
Passeriformes		Carduelis psaltria	Lesser Goldfinch				<b>\</b>		>						
	Fringillidae	Carduelis lawrencei	Lawrence's Goldfinch				>		<b>&gt;</b>						
	riiigiiiidae	Carduelis tristis	American Goldfinch				~	~							
		Carpodacus mexicanus	House Finch				>		<b>&gt;</b>						
	Passeridae	Passer domesticus	House Sparrow				~	~	>						
Total Number		49													
MAMMALS															
Lagomorpha	Leporidae	Sylvilagus bachmani	Brush Rabbit			>	>								
Rodentia	Sciuridae	Spermophilus beecheyi	California Ground Squirrel				<b>\</b>								
Rodenila	Geomyidae	Thomomys bottae	Botta's Pocket Gopher				<b>\</b>								
	Canidae	Canis latrans	Coyote		~	~	~	~							
	Mustelidae	Mustela frenata	Long-tailed Weasel				>								
Carnivora	iviusiellude	Taxidea taxus	American Badger	SC			>								
	Mephitidae	Mephitis mephitis	Striped Skunk			~	~	<b>&gt;</b>							
	Felidae	Puma concolor	Mountain Lion				>		<b>&gt;</b>						

## Wildlife Species Observed in 2006 ConocoPhillips

	Species  ler Family Scientific Name Common Name						Habitat			
Order	Family	Scientific Name	Common Name	Special Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water
Artiodactyla	Cervidae	Odocoileus hemionus columbianus	Black-tailed Deer			~	~	~		
Total Number		9								

Total Species:	69
Total Observed first	
time in 2006	

Key

#### Site Specific Status Designations

O Observed

O\* Observed first time in 2004

E Expected

U Unlikely Reference

SUN Status Uncertain California Wildlife Habitat Relationships System

(I) Introduced

#### **Special Status**

Federal Listing

#### Seasonal Status Designations

RB Resident Breeder
SV Summer Visitor
WV Winter Visitor

U.S. Fish and Wildlife Service

FE Endangered FT Threatened

M Migrant
T Transient

t State of California

SUN Status Uncertain CE
(I) Introduced CT
SC

Endangered
Threatened
Special Concern

#### **Abundance Designations**

Non-native

A Abundant
C Common
U Uncommon
R Rare

		Species					Habitat			
Order	Family	Scientific Name	Common Name		Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water
INVERTEBRATES										
Xanthonychidae	Helminthoglyptidae	Helminthoglypta fieldi	Surf Shoulderband				>			
Coleoptera	Tenebrionidae	Coelus ciliatus	Ciliate Dune Beetle			<b>&gt;</b>	>			
Diplopoda	undetermined	undetermined	Millipede				~			
		Camponotus sp.	Harvester Ant				~			
Hymenoptera	Forminaceae	Formica sp.	Mound-building ant				~			
		Undetermined	Ant				~			
Total Number	Total Number 6									
AMPHIBIANS										
	Hylidae	Hyla regilla	Pacific Tree Frog						~	~
Anura	Ranidae	Rana draytonii	California Red-legged Frog	FT/SC					~	~
	randao	Rana catesbeiana	Bullfrog						~	~
Total Number		3								
REPTILES	,									
Testudines	Emydidae	Clemmys marmorata pallida	Southwestern Pond Turtle	SC					~	~
		Uta stansburiana	Side-blotched Lizard				>			
	Phrynosomatidae	Phrynosoma coronatum frontale	California Horned Lizard	SC			~			
Squamata		Sceloporus occidentalis	Western Fence Lizard				~		~	
	Anguidae	Anniella pulchra pulchra	Silvery Legless Lizard	SC		~	~			
	Colubridae Thamn		Coast Garter Snake				>		~	~
Total Number		6								
BIRDS					T	T				
Gaviiformes	Podicipedidae	Podiceps nigricollis	Eared Grebe						~	~
	,	Podilymbus podiceps	Pied-billed Grebe						~	~
Pelicaniformes	Phalacrocoracidae	Phalacrocorac auritus	Double-crested Cormorant						~	~

		Species					Habitat			
Order	Family	Scientific Name	Common Name	Special Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water
		Ardea herodias	Great Blue Heron					~	~	~
		Botaurus lentiginosus	American Bittern						>	~
	Audeidee	Butorides virescens	Green Heron						<b>&gt;</b>	~
Ciconiiformes	Ardeidae	Casmerodius albus	Great Egret						<b>&gt;</b>	~
		Egretta thula	Snowy Egret						<b>&gt;</b>	~
		Nycticorax nycticorax	Black-crowned Night Heron						<b>&gt;</b>	~
	Cathartidae	Cathartes aura	Turkey Vulture						<b>&gt;</b>	~
		Anas cyanoptera	Cinnamon Teal						~	~
		Anas platyrhynchos	Mallard						<b>&gt;</b>	~
Anseriformes	Anatidae	Anas strepera	Gadwall						<b>&gt;</b>	~
		Bucephala albeola	Bufflehead						~	~
		Oxyura jamaicensis	Ruddy Duck						~	~
		Buteo lineatus	Red-shouldered Hawk			~	~		<b>&gt;</b>	
Falconiformes	Accipitridae	Buteo jamaicensis	Red-tailed Hawk			~	~		<b>&gt;</b>	
raiconilonnes		Circus cyaneus	Northern Harrier	SC		~	~	<	<b>&gt;</b>	~
	Falconidae	Falco sparverius	American Kestrel			~	~		<b>&gt;</b>	
Galliformes	Odontophoridae	Callipepla californica	California Quail			>	>		>	
Gruiformes	Rallidae	Fulica americana	American Coot							~
	Charadriidae	Charadrius alexandrinus	Western Snowy Plover	FT/SC	~					
	Onaradilidae	Charadrius vociferus	Killdeer		~	~				~
		Numenius phaeopus	Whimbrel		~					
Charadriiformes	Scolopacidae	Phalarope fulicarius	Red-necked Phalarope							~
		Calidris alba	Sanderling		~					
	Laridae	Larus occidentalis	Western Gull		~					
	Landao	Sterna antillarum	California Least Tern	FT/CE/SC	~					~
Columbiformes	Columbidae	Columba livia	Rock Pigeon		~	~	~		~	~
Solumbilottics	Oolumbidac	Zenaida macroura	Mourning Dove			~	~		~	
	Apodidae	Aeronautes saxatalis	White-throated Swift			~	~			
Apodiformes	Trochilidae	Calypte anna	Anna's Hummingbird			~	~		~	
	Hodinidae	Selasphorus sasin	Allen's Hummingbird			~	~		~	

		Species					Habitat			
Order	Family	Scientific Name	Common Name	Special Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water
Coraciiformes	Alcedinidae	Ceryle alcyon	Belted Kingfisher							~
		Colaptes auratus	Northern Flicker				~		~	
Piciformes	Picidae	Picoides nuttallii	Nuttall's Woodpecker				<b>&gt;</b>		~	
		Picoides pubescens	Downy Woodpecker				~		~	
		Empidonax difficilis	Pacific-slope Flycatcher				~		~	
	Tyrannidae	Sayornis nigricans	Black Phoebe				~		~	<b>&gt;</b>
		Myiachus cinerascens	Ash-throated Flycatcher						~	
	Laniidae	Lanius Iudovicianus	Loggerhead Shrike	SC		<b>&gt;</b>	~		~	<b>~</b>
	Vireonidae	Vireo gilvus	Warbling Vireo						~	
		Aphelocoma californica	Western Scrub Jay			>	>		~	
	Corvidae	Corvus brachyrhynchos	American Crow		~	~	~		~	
		Corvus corax	Common Raven		<b>&gt;</b>	<b>&gt;</b>	~	<b>~</b>	~	~
	Alaudidae	Eremophila alpestris	Horned Lark			<b>&gt;</b>	~			
		Hirundo rustica	Barn Swallow			<b>&gt;</b>	~			~
	Hirundinidae	Petrochelidon pyrrhonota	Cliff Swallow			>	~		~	~
Passeriformes	Hilulidindae	Stelgidopteryx serripennis	Northern Rough-winged Swallow			>	>			~
		Tachycineta bicolor	Tree Swallow			~	~			~
	Aegithalidae	Psaltriparus minimus	Bushtit			~	~		~	
	Paridae	Poecile rufescens	Chestnut-backed Chickadee						~	
	Tandac	Baeolophus inornatus	Oat Titmouse				~		~	
		Cistothorus palustris	Marsh Wren							~
	Troglodytidae	Thryomanes bewickii	Bewick's Wren				~		~	~
		Troglodytes aedon	House Wren				~		~	
	Regulidae	Regulus calendula	Ruby-crowned Kinglet				~		~	
	Turdidae	Turdus migratorius	American Robin				~		~	
	Taraiado	Catharus ustulatus	Swainson's Thrush	SC					~	
	Timaliidae	Chamaea fasciata	Wrentit			~	~		~	

		Species			Habitat						
Order	Family	Scientific Name	Common Name	Special Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water	
	Mimidae	Mimus polyglottos	Northern Mockingbird			~	~		~	~	
	Williade	Toxostoma redivivum	California Thrasher				~				
	Sturnidae	Sturnus vulgaris	European Starling				>		~		
		Vermivora celata	Orange-crowned Warbler						~		
		Dendroica coronata	Yellow-rumped Warbler				~		~		
		Dendroica occidentalis	Hermit Warbler						~		
	Parulidae	Dendroica petechia	Yellow Warbler	SC					~		
		Dendroica townsendi	Townsend's Warbler						~		
		Geothlypis trichas	Common Yellowthroat						~	~	
		Wilsonia pusilla	Wilson's Warbler						~		
		Junco hyemalis	Dark-eyed Junco						~		
		Melospiza melodia	Song Sparrow			~		~	~		
Passeriformes	Emberizidae	Passerculus sandwichensis	Savannah Sparrow			~					
	Emberizidae	Pipilo crissalis	California Towhee		~	~		~			
		Pipilo maculatus	Spotted Towhee		~	~		~			
		Zonotrichia leucophrys	White-crowned Sparrow			~					
	Cardinalidae	Pheucticus melanocephalus	Black-headed Grosbeak			~		~			
		Agelaius phoeniceus	Red-winged Blackbird						~	<b>&gt;</b>	
	Icteridae	Euphagus cyanocephalus	Brewer's Blackbird						~	<b>&gt;</b>	
		Molothrus ater	Brown-headed Cowbird			~	~		~		
		Carpodacus purpureus	Purple Finch						~		
	Fringillidae	Carpodacus mexicanus	House Finch				>		~		
	i illigillidae	Carduelis psaltria	Lesser Goldfinch				>		~		
		Carduelis tristis	American Goldfinch				~		~		
	Passeridae	Passer domesticus	House Sparrow				~		~		
Total Number		85									
MAMMALS											
Insectivora	Talpidae	Scapanus latimanus	Broad-footed Mole			~	~				
Lagomorpha	Leporidae	Sylvilagus bachmani	Brush Rabbit				~				

		Species				Habitat								
Order	Family	Scientific Name	Common Name		Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water				
	Geomyidae	Thomomys bottae	Botta's Pocket Gopher				~							
Rodentia	Muridae	Neotoma macrotis	Large-eared Woodrat				~							
		Ondatra zibethicus	Common Muskrat							<b>*</b>				
	Canidae	Canis latrans	Coyote			~	<b>\</b>	<	~	<b>&gt;</b>				
	Carridae	Urocyon cinereoargenteus	Common Gray Fox											
	Procyonidae	Procyon lotor	Northern Raccoon			~	`	<	~	<b>&gt;</b>				
Carnivora	Mustelidae	Mustela frenata	Long-tailed Weasel			>	<b>\</b>							
Carnivora	wustellaae	Taxidea taxus	American Badger	SC			~							
	Mephitidae	Mephitis mephitis	Striped Skunk			<b>&gt;</b>	~		~	~				
	Falldan	Lynx rufus	Bobcat				~		~					
	Felidae	Puma concolor	Mountain Lion				~		~					
Artiodactyla	Cervidae	Odocoileus hemionus columbianus	Black-tailed Deer			<b>&gt;</b>	~	~	~					
Total Number		14												

Total Species:	114
Total Observed in 2006	

## Wildlife Species Observed in 2006 Oso Flaco and Little Oso Flaco

	Species Specie				Habitat						
Order	Family	Scientific Name	Common Name	Special Status	Shoreline/Beach	Vegetated Foredunes	Vegetated Backdunes	Unvegetated Dunes (Open Sand)	Riparian	Freshwater Marsh/Lake/Open Water	

Key

#### Site Specific Status Designations

0 Observed

0\* Observed first time in 2005 or 2006

Е Expected Reference

U Unlikely California Wildlife Habitat Relationships System

SUN Status Uncertain Introduced (I)

**Special Status** 

Federal Listing

#### **Seasonal Status Designations**

RB

SV

U.S. Fish and Wildlife Service Resident Breeder FΕ Endangered Summer Visitor FT Threatened

WV Winter Visitor

Migrant State of California

М Transient CE Endangered SUN Status Uncertain CT Threatened (I) Introduced SC Special Concern

#### **Abundance Designations**

Non-Native

Abundant С Common U Uncommon R Rare

# Animal Taxa Documented On Site 2006

Wildlife Type	Special Status Species	Special Status Species Sub-Total				
INVERTEBRATES	None	0				
AMPHIBIANS	California Red-legged Frog	1				
REPTILES	Southwestern Pond Turtle					
	California Coast Horned Lizard	3				
	Silverly Legless Lizard					
	Double -crested Cormorant					
	Cooper's Hawk					
	Northern Harrier					
BIRDS	Western Snowy Plover	9				
BINDS	California Least Tern	<b>9</b>				
	Burrowing Owl					
	Loggerhead Shrike					
	Yellow Warbler					
MAMMALS	American Badger	1				
Total		14				

Wildlife Type	Sub-Total
INVERTEBRATES	8
AMPHIBIANS	3
REPTILES	8
BIRDS	110
MAMMALS	17
Total	146

# Special Status and Other Selected Wildlife Observations 2006

Oceano Dunes Alternative Access Study

IDENT	Scientific Name	Common Name	LAT	LONG	DATE	ALTITUDE	Observers
003	Anniella pulchra pulchra	Silvery legless lizard	35.03708012	-120.60731588	07-JUN-06 12:33	119.00	V. Semonsen, E. Gevirtz
004	Anniella pulchra pulchra	Silvery legless lizard	35.03710653	-120.60741956	07-JUN-06 12:35	118.00	V. Semonsen, E. Gevirtz
072	Anniella pulchra pulchra	Silvery legless lizard	35.03988781	-120.59591247	23-MAR-06 11:14	42.00	V. Semonsen, E. Gevirtz
082	Anniella pulchra pulchra	Silvery legless lizard	35.09680194	-120.62736548	30-MAR-06 15:18	-51.00	V. Semonsen, E. Gevirtz
077	Athene cunicularia	Burrowing owl	35.03668743	-120.59956966	23-MAR-06 12:58	51.00	V. Semonsen, E. Gevirtz
080	Bubo virginianus	Great horned owl nest	35.03784573	-120.60341360	23-MAR-06 13:41	36.00	V. Semonsen, E. Gevirtz
h1	Circus cyaneus	Northern harrier	0.00000000	0.00000000	18-APR-06	0.00	V. Semonsen, E. Gevirtz
116	Circus cyaneus	Northern harrier	35.03218643	-120.62761257	01-MAY-06 10:50	4.00	E. Gevirtz
079	Clemmys marmorata pallida	Southwestern pond turtle	35.03681433	-120.60119181	23-MAR-06 13:08	55.00	V. Semonsen, E. Gevirtz
t21	Clemmys marmorata pallida	Southwestern pond turtle	0.00000000	0.00000000	18-APR-06	0.00	V. Semonsen
t63	Clemmys marmorata pallida	Southwestern pond turtle	0.00000000	0.00000000	18-APR-06	0.00	V. Semonsen
t65	Clemmys marmorata pallida	Southwestern pond turtle	0.00000000	0.00000000	01-MAY-06	0.00	V. Semonsen, E. Gevirtz
078	Lanius Iudovicianus	Loggerhead shrike	35.03678324	-120.60006344	23-MAR-06 13:00	56.00	E. Gevirtz
s25	Lanius Iudovicianus	Loggerhead shrike	0.00000000	0.00000000	04-JUL-06	0.00	V. Semonsen
s59	Lanius Iudovicianus	Loggerhead shrike	0.00000000	0.00000000	20-Jun-06	0.00	E. Gevirtz, Z. Labinger
007	Phrynosoma coronatum frontale	California horned lizard	35.03611914	-120.60635573	07-JUN-06 13:51	60.00	V. Semonsen, E. Gevirtz
011	Plebejus icarioides moroensis	Morro Boisduval's blue	35.03988429	-120.59631187	17-MAY-06 11:28	38.00	E. Gevirtz
018	Plebejus icarioides moroensis	Morro Boisduval's blue	35.03681844	-120.59544174	17-MAY-06 11:51	62.00	E. Gevirtz
028	Plebejus icarioides moroensis	Morro Boisduval's blue	35.03647118	-120.59812571	17-MAY-06 13:18	33.00	E. Gevirtz
001B	Plebejus icarioides moroensis	Morro Boisduval's blue	35.03715833	-120.60721496	07-JUN-06 12:33	124.00	E. Gevirtz
002B	Plebejus icarioides moroensis	Morro Boisduval's blue	35.03715833	-120.60721496	07-JUN-06 12:33	124.00	E. Gevirtz
005	Plebejus icarioides moroensis	Morro Boisduval's blue	35.03634696	-120.60556599	07-JUN-06 13:22	67.00	E. Gevirtz
079	Rana draytonii	California red-legged frog	35.03681433	-120.60119181	23-MAR-06 13:08	55.00	V. Semonsen, E. Gevirtz
f22	Rana draytonii	California red-legged frog	0.00000000	0.00000000	23-MAR-06 13:08	0.00	V. Semonsen, E. Gevirtz
lt2	Sterna antillarum browni	California least tern	0.00000000	0.00000000	20-JUN-06	0.00	E. Gevirtz, Z. Labinger, V.
ILZ	Sterria aritiliarum browni	California least terri	0.00000000	0.00000000	20-3014-00	0.00	Semonsen
lt3	Sterna antillarum browni	California least tern	0.00000000	0.00000000	21-JUN-06	0.00	Z. Labinger, V. Semonsen
lt1	Sterna antillarum browni	California least tern	0.00000000	0.00000000	07-JUN-06 14:03	0.00	V. Semonsen, E. Gevirtz
ts26	Tachycineta bicolor	Tree swallow nests	0.00000000	0.00000000	07-JUN-06 14:03	0.00	V. Semonsen, E. Gevirtz
121	Taxidea taxus	American badger	35.04488678	-120.62373402	01-MAY-06 14:23	14.00	V. Semonsen, E. Gevirtz
122	Taxidea taxus	American badger	35.03880872	-120.59648294	01-MAY-06 15:46	81.00	V. Semonsen, E. Gevirtz
800	Taxidea taxus	American badger	35.03584170	-120.60669989	07-JUN-06 14:03	40.00	V. Semonsen, E. Gevirtz
b24	Taxidea taxus	American badger	0.00000000	0.00000000	01-MAY-06 15:46	0.00	V. Semonsen, E. Gevirtz

Project: OCEANO DUNES STATE VEHICULAR RECREATION AREA

Location: Ocean Street Alternative
Client: OCEANO DUNES DISTRICT

W.O. No.: 16825.01
Calc'd By: Genaro Diaz
Path Name: S:\ACAD\Work\16825\Estimates

File Name: Ocean St. Alternative.xls





Date: 10-Feb-06

Checked By: DSP

**ESTIMATED** UNIT TOTAL ITEM DESCRIPTION UNIT QUANTITY COST COST AC ROAD Excavation Rd. a. 32' wide Road (1288'x32'x2'depth) CY 3053.0 12.00 \$36,636 Rd. b. 32' wide Road (600'x32'x2'depth) CY 1422.2 12.00 \$17,067 11715.6 Rd. c. 32' wide Road (3295'x32'x3'depth) CY 12.00 \$140,587 CLASS II Aggregate Base Rd. a. 28' wide Road (1288'x28'x1'depth) TON 2704.8 13.00 \$35,162 Rd. b. 28' wide Road (600'x28'x1'depth) TON 1260.0 13.00 \$16,380 Rd. c. 28' wide Road (3295'x28'x1'depth) TON 6919.5 13.00 \$89,954 0.2' A/C Roadway Rd. a. 28' wide Road (1288'x28'x.2'depth) TON 541.0 70.00 \$37,867 Rd. b. 28' wide Road (600'x28'x.2'depth) TON 252.0 70.00 \$17,640 Rd. c. 28' wide Road (3295'x28'x5/24'depth) TON 1383.9 70.00 \$96,873 Two Lane Bridge (180L'x26'W plus 5'SW on side) LS 750,000.00 \$750,000 4 1.0 5 Traffic Control LS 1.0 5,000.00 \$5,000 Mob./ Demob. (5% of bid items 1-5) LS 1.0 62,158.29 \$62,158

LS

**Estimated Construction Cost:** 

Bonds, Insurance (2% of bid items 1-5)

\$1,330,187

\$24,863

10% Contingency

\$133,019

TOTAL

24,863.32

1.0

\$1,463,206

### Design/Administration (as a percentage of the estimated construction cost)

 Design
 10%
 \$146,321

 Construction Engineering
 8%
 \$117,056

 Surveying
 7%
 \$102,424

 Testing
 3%
 \$43,896

 Total One Time Costs
 \$1,872,904

Road a.: Delta Lane from Ocean St. to Bridge at N. Levee

Road b.: From Bridge to end of S. Levee Road. c.: New Road from Levee to Dunes

Bridge: Assume two span 180' modular bridge (concrete)

OCEANO DUNES STATE VEHICULAR RECREATION AREA Project:

Creek Road Alternative Location: Client: OCEANO DUNES DISTRICT

W.O. No.: 16825.01

Calc'd By: Genaro Diaz Path Name: S:\ACAD\Work\16825\Estimates

File Name: Creek Rd Alternative.xls



Penfield & Smith ENGINEERS . SURVEYORS . PLANNERS

Date: 10-Feb-06 Checked By: DSP

			ESTIMATED	UNIT	TOTAL
ITEM	DESCRIPTION	UNIT	QUANTITY	COST	COST
	AC ROAD				
1	Excavation				
	Rd. a. 32' wide Road (1084'x32'x2'depth)	CY	2569.5	12.00	\$30,834
	Rd. b. 32' wide Road (2690'x32'x2'depth)	CY	6376.3	12.00	\$76,516
	Rd. c. 32' wide Road (3295'x32'x3'depth)	CY	11715.6	12.00	\$140,587
2	CLASS II Aggregate Base				
	Rd. a. 28' wide Road (1084'x28'x1'depth)	TON	2276.4	13.00	\$29,593
	Rd. b. 28' wide Road (2690'x28'x1'depth)	TON	5649.0	13.00	\$73,437
	Rd. c. 28' wide Road (3295'x28'x1'depth)	TON	6919.5	13.00	\$89,954
3	2.5"AC Roadway				
	Rd. a. 28' wide Road (1084'x28'x0.2'depth)	TON	455.3	70.00	\$31,870
	Rd. b. 28' wide Road (2690'x28'x0.2'depth)	TON	1129.8	70.00	\$79,086
	Rd. c. 28' wide Road (3295'x28'x0.2'depth)	TON	1383.9	70.00	\$96,873
4	Two Lane Bridge (180L'x26'W plus 5'SW on side)	LS	1.0	750,000.00	\$750,000
5	Traffic Control	LS	1.0	5,000.00	\$5,000
6	Mob./ Demob. (5% of bid items 1-5)	LS	1.0	70,187.42	\$70,187
7	Bonds, Insurance (2% of bid items 1-5)	LS	1.0	28,074.97	\$28,075

**Estimated Construction Cost:** 

\$1,502,011

10% Contingency

\$150,201

TOTAL

\$1,652,212

### Design/Administration (as a percentage of the estimated construction cost)

Design	10%	\$165,221
Construction Engineering	8%	\$132,177
Surveying	7%	\$115,655
Testing	3%	\$49,566
Total One Time Costs		\$2,114,831

Road a.: Creek Road from Railroad St. to N. Levee

Road b.: N. Levee Road to Bridge, S. Levee from Bridge to end of S. Levee

Road. c.: New Road from Levee to Dunes

Bridge: Assume two span 180' modular bridge (concrete)

Project: OCEANO DUNES STATE VEHICULAR RECREATION AREA

Location: Silver Spur Place

W.O. No.: 16825.01

Client: OCEANO DUNES DISTRICT

Calc'd By: Genaro Diaz Path Name: S:\ACAD\Work\16825\Estimates

File Name: Silver Spur Pl.xls



**Penfield & Smith** ENGINEERS . SURVEYORS . PLANNERS

Date: 10-Feb-06

Checked By: DSP

			ESTIMATED	UNIT	TOTAL
ITEM	DESCRIPTION	UNIT	QUANTITY	COST	COST
	AC ROAD				
1	Excavation				
	Rd. a. 32' wide Road (640'x32'x2'depth)	CY	1517.0	12.00	\$18,204
	Rd. b. 32' wide Road (2690'x32'x2'depth)	CY	6376.3	12.00	\$76,516
	Rd. c. 32' wide Road (1800'x32'x2'depth)	CY	4266.7	12.00	\$51,200
2	CLASS II Aggregate Base				
	Rd. a. 28' wide Road (640'x28'x1'depth)	TON	1344.0	13.00	\$17,472
	Rd. b. 28' wide Road (2690'x28'x1'depth)	TON	5649.0	13.00	\$73,437
	Rd. c. 28' wide Road (1800'x28'x1'depth)	TON	3510.0	13.00	\$45,630
3	0.2' AC Roadway				
	Rd. a. 28' wide Road (640'x28'x0.2'depth)	TON	268.8	70.00	\$18,816
	Rd. b. 28' wide Road (2690'x28'x0.2'depth)	TON	1129.8	70.00	\$79,086
	Rd. c. 28' wide Road (1800'x28'x0.2'depth)	TON	756.0	70.00	\$52,920
4	Traffic Control	LS	1.0	5,000.00	\$5,000
5	Mob./ Demob. (5% of bid items 1-4)	LS	1.0	21,914.05	\$21,914
6	Bonds, Insurance (2% of bid items 1-4)	LS	1.0	8,765.62	\$8,766

**Estimated Construction Cost:** 

Testing

\$468,961

10% Contingency

\$46,896 \$515,857

\$15,476

\$660,297

<b>Design/Administration</b> (as a percentage of the estimated construction cost)					
Design	10%	\$51,586			
Construction Engineering	8%	\$41,269			
Surveying	7%	\$36,110			

3%

TOTAL

Road a.: Creek Road from Silver Spur Place. to S. Levee Road b.: S. Levee Road from Creek Road to end of S. Levee

**Total One Time Costs** 

Road. c.: New Road from end of S. Levee to Dunes

Project: OCEANO DUNES STATE VEHICULAR RECREATION AREA

Location: ConocoPhillips Alternative
Client: OCEANO DUNES DISTRICT

Conoco Philips Alternative.xls

W.O. No.: 16825.01 Calc'd By: Genaro Diaz Path Name: S:\ACAD\Work\16825\Estimates

File Name:





Date: 10-Feb-06 Checked By: DSP

			ESTIMATED	UNIT	TOTAL
ITEM	DESCRIPTION	UNIT	QUANTITY	COST	COST
	AC ROAD/PARKING				
1	Over-excavation & Recompact				
	Rd. a. 32' wide Road (2222'x32'x1'depth)	CY	2633.5	12.00	\$31,602
	Rd. b. 32' wide Road (7745'x32'x3'depth)	CY	27537.8	12.00	\$330,453
	Lot c. Parking Lot (25,000sf x 3' depth)	CY	2777.8	12.00	\$33,333
	Rd. d. 32' wide Road (5500'x32'x3'depth)	CY	19555.6	12.00	\$234,667
2	CLASS II Aggregate Base				
	Rd. a. 28' wide Road (2222'x28'x1'depth)	TON	4666.2	13.00	\$60,661
	Rd. b. 28' wide Road (7745'x28'x1'depth)	TON	16264.5	13.00	\$211,439
	Lot c. Parking Lot (25,000sf x 1' depth)	TON	1875.0	13.00	\$24,375
	Rd. d. 28' wide Road (5500'x28'x1'depth)	TON	11550.0	13.00	\$150,150
3	2.5"AC Roadway				
	Rd. a. 28' wide Road (2222'x28'x0.2'depth)	TON	933.2	70.00	\$65,327
	Rd. b. 28' wide Road (7745'x28'x0.2'depth)	TON	3252.9	70.00	\$227,703
	Lot c. Parking Lot (25,000sf x 0.2' depth)	TON	375.0	70.00	\$26,250
	Rd. d. 28' wide Road (5500'x28'x0.2'depth)	TON	2310.0	70.00	\$161,700
4	UPRR Crossing At-Grade Improvements	LS	1.0	115,000.00	\$115,000
5	Traffic Control	LS	1.0	5,000.00	\$5,000
6	Mob./ Demob. (5% of bid items 1-5)	LS	1.0	83,882.95	\$83,883
7	Bonds, Insurance (2% of bid items 1-5)	LS	1.0	33,553.18	\$33,553

**Estimated Construction Cost:** 

\$1,795,095

10% Contingency

\$179,510 TOTAL \$1,974,605

Design/Administration (as a percentage of the estimated construction cost)

Design	10%	\$197,460
Construction Engineering	8%	\$157,968
Surveying	7%	\$138,222
Testing	3%	\$59,238
Total One Time Costs		\$2,527,494

Road a.:To Tosco Gate Road from HWY 1 to refinery

Road b.: From refinery to top of dunes

Parking Lot c.: At entrance to dunes (top of dunes)

Road. d.: From parking lot to beach

Project: OCEANO DUNES STATE VEHICULAR RECREATION AREA

Location: Oso Flaco Lake Alternative
Client: OCEANO DUNES DISTRICT

W.O. No.: 16825.01

Calc'd By: Genaro Diaz

Path Name: S:\ACAD\\Work\16825\Estimates

File Name: Oso Flaco Lake Alternative.xls





Date: 10-Feb-06 Checked By: DSP

			ESTIMATED	UNIT	TOTAL
ITEM	DESCRIPTION	UNIT	QUANTITY	COST	COST
	AC ROAD				
1	Excavation				
	Rd. a. 32' wide Road (14000'x32'x1'depth)	CY	16592.6	12.00	\$199,111
	Rd. b. 32' wide Road (4300'x32'x1'depth)	CY	5096.3	12.00	\$61,156
	Rd. c. 32' wide Road (4100'x32'x3'depth)	CY	14577.8	12.00	\$174,933
2	CLASS II Aggregate Base				
	Rd. a. 28' wide Road (14000'x28'x1'depth)	TON	29400.0	13.00	\$382,200
	Rd. b. 28' wide Road (4300'x28'x1'depth)	TON	9030.0	13.00	\$117,390
	Rd. c. 28' wide Road (4100'x28'x1'depth)	TON	8610.0	13.00	\$111,930
3	0.2' AC Roadway				
	Rd. a. 28' wide Road (14000'x28'x0.2'depth)	TON	5880.0	70.00	\$411,600
	Rd. b. 28' wide Road (4300'x28'x0.2'depth)	TON	1806.0	70.00	\$126,420
	Rd. c. 28' wide Road (4100'x28'x0.2'depth)	TON	1722.0	70.00	\$120,540
4	48" RCP Low Water crossing (26' wide x 40')	LF	360.0	500.00	\$180,000
5	UPRR Crossing At-Grade Improvements	LS	1.0	115,000.00	\$115,000
6	Traffic Control	LS	1.0	5,000.00	\$5,000
7	Mob./ Demob. (5% of bid items 1-6)	LS	1.0	100,264.00	\$100,264
8	Bonds, Insurance (2% of bid items 1-6)	LS	1.0	40,105.60	\$40,106

Estimated Construction Cost:

\$2,145,650

10% Contingency

\$214,565

TOTAL

\$2,360,215

Design/Administration (as a percentage of the estimated construction cost)

 Design
 10%
 \$236,021

 Construction Engineering
 8%
 \$188,817

 Surveying
 7%
 \$165,215

 Testing
 3%
 \$70,806

 Total One Time Costs
 \$3,021,075

Road a.:Oso Flaco Lake Road from HWY 1 to Little Oso Flaco Lake Alternative Cuttoff Road b.:Oso Flaco Lake Road from Little Oso Flaco Lake Alternative Cuttoff to Dunes Road. c.: From dunes to the beach

#### PRELIMINARY CONSTRUCTION COST ESTIMATE

OCEANO DUNES STATE VEHICULAR RECREATION ARE CONDOR ENVIRONMENTAL Project:

Location: Little Oso Flaco Lake Alternative

OCEANO DUNES DISTRICT Client:

W.O. No.: 16825.01 Calc'd By: Genaro Diaz Path Name: S:\ACAD\Work\16825\Estimates File Name: Little Oso Flaco Lake Alternative.xls



Date: 10-Feb-06 Checked By: DSP

			ESTIMATED	UNIT	TOTAL
ITEM	DESCRIPTION	UNIT	QUANTITY	COST	COST
	AC ROAD				
1	Excavation				
	Rd. a. 32' wide Road (14000'x32'x1'depth)	CY	16592.6	12.00	\$199,111
	Rd. b. 32' wide Road (5100'x32'x2'depth)	CY	12088.9	12.00	\$145,067
	Rd. c. 32' wide Road (2250'x32'x3'depth)	CY	8000.0	12.00	\$96,000
	Rd. d. 32' wide Road (5500'x32'x3'depth)	CY	19555.6	12.00	\$234,667
	lot e. Parking Lot (25,000sf x 3' depth)	CY	2777.8	12.00	\$33,333
2	CLASS II Aggregate Base				
	Rd. a. 28' wide Road (14000'x28'x1'depth)	TON	29400.0	13.00	\$382,200
	Rd. b. 28' wide Road (5100'x28'x1'depth)	TON	10710.0	13.00	\$139,230
	Rd. c. 28' wide Road (2250'x28'x1'depth)	TON	4725.0	13.00	\$61,425
	Rd. d. 28' wide Road (5500'x28'x1'depth)	TON	11550.0	13.00	\$150,150
	lot e. Parking Lot (25,000sf x 1' depth)	TON	1875.0	13.00	\$24,375
3	0.2' AC Roadway				
	Rd. a. 28' wide Road (14000'x28'x0.2'depth)	TON	5880.0	70.00	\$411,600
	Rd. b. 28' wide Road (5100'x28'x0.2'depth)	TON	2142.0	70.00	\$149,940
	Rd. c. 28' wide Road (2250'x28'x.2'depth)	TON	945.0	70.00	\$66,150
	Rd. d. 28' wide Road (5500'x28'x.2'depth)	TON	2310.0	70.00	\$161,700
	lot e. Parking Lot (25,000sf x.2' depth)	TON	375.0	70.00	\$26,250
4	48" RCP Low Water crossing 6*(26' wide x 40')	LF	200.0	500.00	\$100,000
5	UPRR Crossing At-Grade Improvements	LS	1.0	115,000.00	\$115,000

**Estimated Construction Cost:** \$2,674,801

LS

LS

1.0

1.0

5,000.00

125,059.89

\$5,000

\$125,060

10% Contingency \$267,480 TOTAL \$2,942,281

Design/Administration (as a percentage of the estimated construction cost)

Design 10% \$294,228 Construction Engineering 8% \$235,382 Surveying 7% \$205,960 3% Testing \$88,268 **Total One Time Costs** \$3,766,119

Road a.:Oso Flaco Lake Road from HWY 1 to Little Oso Flaco Lake Alternative Cuttoff

Road b.: New little Oso Flaco Lake Road Cutoff from Oso Flaco Lake Road to Tosco Gate Road

Road c: Tosco Road from New little Oso Flaco Lake Road Cutoff to new parking lot at entrance to dunes (top of dunes)

Road. d.: New road from parking lot to the beach

Traffic Control

Mob./ Demob. (5% of bid items 1-6)

Bonds, Insurance (2% of bid items 1-6)

Parking Lot e.: Parking Lot at entrance to dunes

# PRELIMINARY CONSTRUCTION COST ESTIMATE

Project: OCEANO DUNES STATE VEHICULAR RECREATION AREA

Location: Beach Bridge Option 1
Client: OCEANO DUNES DISTRICT

File Name:

W.O. No.: 16825.01
Calc'd By: Doug Pike
Path Name: S:\ACAD\Work\16825\Estimates

Beach Bridge Option 1 Estimate





Date: 28-Aug-06 Checked By: DSP

			ESTIMATED	UNIT	TOTAL
ITEM	DESCRIPTION	UNIT	QUANTITY	COST	COST
	Structure				
1	Structural Steel & Fabrication	LBS	5000.0	12.00	\$60,000
2	Moving and Maneuvering Vehicle (Front End				
	Loader)	EA	1.0	115,000.00	\$115,000
4	Fabricator Tool-up (5% of bid items 1-5)	LS	1.0	8,750.00	\$8,750
5	Bonds, Insurance (2% of bid items 1-5)	LS	1.0	3,500.00	\$3,500

 Estimated Construction Cost:
 \$187,250

 10% Contingency
 \$18,725

 TOTAL
 \$205,975

**Design/Administration** (as a percentage of the estimated construction cost)

Design	10%	\$20,598
Construction Engineering	8%	\$16,478
Surveying	0%	\$0
Testing	3%	\$6,179
Total One Time Costs		\$249,230

# **Annual Operational Costs**

 Equipment Operator
 Hrs
 1040
 32.00
 \$33,280

 Flagger
 Hrs
 2080
 18.00
 \$37,440

 First Year Operation Cost
 \$70,720

20 year operation cost (with 3% annual escalation) \$1,900,273

<sup>\*</sup> In order to increase viability of this option, two of these bridges would be constructed. Therefore, the total estimated construction cost would be  $\$205,975 \times 2 = \$411,950$ . Design and Administration Costs are assumed to remain the same.

# PRELIMINARY CONSTRUCTION COST ESTIMATE

Project: OCEANO DUNES STATE VEHICULAR RECREATION AREA

Location: Beach Bridge Option 2
Client: OCEANO DUNES DISTRICT

W.O. No.: 16825.01 Calc'd By: Doug Pike

Path Name: S:\ACAD\Work\16825\Estimates
File Name: Beach Bridge Option 2 Estimate





ENGINEERS • SURVEYORS • PLANNERS

Date: 28-Aug-06 Checked By: DSP

			ESTIMATED	UNIT	TOTAL
ITEM	DESCRIPTION	UNIT	QUANTITY	COST	COST
	Structure				
1	Piles	EA	88.0	2,500.00	\$220,000
2	Pile Cross Braces	EA	44.0	3,800.00	\$167,200
3	Movable Bridge Sections	EA	8.0	30,000.00	\$240,000
4	Moving and Maneuvering Vehicle (Front End				
	Loader)	EA	1.0	115,000.00	\$115,000
5	Mobilization/Demob (5% of bid items 1-5)	LS	1.0	37,110.00	\$37,110
6	Bonds, Insurance (2% of bid items 1-5)	LS	1.0	14,844.00	\$14,844

 Estimated Construction Cost:
 \$794,154

 10% Contingency
 \$79,415

 TOTAL
 \$873,569

Design/Administration	(as a	percentage	of the	estimated	construction co	ost)
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Design	10%	\$87,357
Construction Engineering	8%	\$69,886
Surveying	0%	\$0
Testing	3%	\$26,207
Total One Time Costs		\$1,057,019

# **Annual Operational Costs**

Equipment Operator	Hrs 10	040 32.0	00 \$33,280

20 year operation cost (with 3% annual escalation) \$1,900,273

 $<sup>^*</sup>$  In order to increase viability of this option, two of these bridges would be constructed. Therefore, the total estimated construction cost would be  $\$873,569 \times 2 = \$1,747,138$ . Design and Administration Costs are assumed to remain the same.

# **MAINTENANCE COSTS**

Project: OCEANO DUNES STATE VEHICULAR RECREATION AREA

Location: All Alternatives

Client: OCEANO DUNES DISTRICT

W.O. No.: 16.825

Calc'd By: Douglas S. Pike

Path Name: S:\ACAD\Work\16825\Estimates

File Name: Access Route Maint Costs





File Name: Access Route Maint C	20818									
			SLURRY COST	PAVEMENT	SAND REMOVAL	SAND REMOVAL	CULVERT	PAVEMENT	20-YR	MAINTENANCE
	PAVEMENT	PAVEMENT	AT \$1.10/SY	LENGTH	(SWEEP) AT\$.05/SY	(GRADE) AT \$1/LF	OR BRIDGE	OVERLAY	MAINTENANCE	COST/YEAR
								(nearest 1,000)	(nearest 1,000)	(nearest 1,000)
ROUTE	LENGTH (FT)	AREA (SY)	(2 TREATMENTS)	IN DUNES (FT)	(120 TREATMENTS)	(ANNUAL)	MAINTENANCE	AT \$30/sy	TOTAL	AVG
1 Grand Avenue (Existing)	1,200	1,422	\$3,129	150	\$133	\$150	\$0	\$43,000	\$47,000	\$3,000
2 Pier Avenue (Existing)	1,000	1,185	\$2,607	150	\$133	\$150	\$0	\$36,000	\$39,000	\$2,000
3 Ocean Street Alternative	5,183	6,143	\$13,514	3295	\$2,929	\$3,295	\$25,000	\$185,000	\$230,000	\$12,000
4 Creek Road Alternative	7,096	8,410	\$18,502	3295	\$2,929	\$3,295	\$25,000	\$253,000	\$303,000	\$16,000
5 Silver Spur Place Alternative	5,130	6,080	\$13,376	3295	\$2,929	\$3,295	\$0	\$183,000	\$203,000	\$11,000
6 Conoco-Phillips Alternative	14,467	17,146	\$37,721	4500	\$4,000	\$4,500	\$0	\$515,000	\$562,000	\$29,000
7 Oso Flaco Lake Road Alt.	22,100	26,193	\$57,624	3800	\$3,378	\$3,800	\$25,000	\$786,000	\$876,000	\$44,000
8 Little Oso Flaco Alternative	25,150	29,807	\$65,576	4500	\$4,000	\$4,500	\$25,000	\$895,000	\$995,000	\$50,000

Date: February 10, 2006

Checked By: DSP

#### **ASSUMPTIONS**

- 1 State Parks will assume maintenance costs beginning at Hwy 1 for alternatives 6, 7 & 8.
- 2 Assume 20 year pavement life followed by new overlay, which will begin a new 20 year maintenance cycle.
- 3 Assume two slurry treatments in 20-year maintenance cycle.
- 4 Assume sweeping every other month on roads in the dunes.
- 5 Assume sand removal from road/shoulder (grade shoulders) once per year.
- 6 Assume bridge and culvert maintenance to include inspections, removal of debris from piers every other year, and some concrete repair
- 7 Maintenance of horse trails not included, as routes and nature of improvements unknown
- 8 This estimate assumes costs of maintaining all new road construction including some County roads. This is a conservative assumption that cannot be discounted until negotiations with the County and permitting is complete.

# Selected Water Quality Data Site: Arroyo Grande Creek Lagoon

Selected Pollutant	Maximum	Minimum	Mean	Acceptable Level	Reference
Selected Toxic Pollutants					
Cadmium in Sediment	4.516	4.516	4.516	9.6	NOAA
Copper in Sediment	22.6	22.6	22.6	270	NOAA
Lead in Sediment	8.387	8.387	8.387	218	NOAA
Mercury in Sediment	0.05	0.05	0.05	0.71	NOAA

units for metals= ppm (ug/g)

Conventional Pollutant information not available

Toxic Pollutant data sampled on March 1, 1998

Source: Central Coast Ambient Monitoring Program (www.ccamp.org) accessed January, 2006



# Selected Water Quality Data Site: Arroyo Grande Creek at 22nd Street

Selected Pollutant	Maximum	Minimum	Mean	Acceptable Level	Reference
Selected Conventional Pollut	ants				
Ammonia as N, Total	0.1	0.005	0.033	2.4	California Ocean Plan Daily Max
Ammonia as N, Unionized	0.006	0	0.001	0.025	Basin Plan General Objective
Fecal Coliform	2400	40	606	400	Basin Plan Water Body Contact Recreation
Coliform, Total	90,000	800	10,572	10,000	Basin Plan Marine Water Contact Recreation
Nitrate as N	7.8	0.074	2.176	10	Basin Municipal and Domestic Supply
Nitrate as NO3	34.7	0.3	9.7	45	Basin Municipal and Domestic Supply
Nitrite as N	0.066	0.005	0.021	1	EPA Primary Max Contaminant Level
Oxygen, Dissolved (DO)	16.1	3.3	10.6	7	Basin Plan Cold Water Fish Habitat
Phosphorus, Total	0.32	0.25	0.292	na	na
Suspended Solids, Total	14	0.5	4.4	na	na
pН	8.71	7.2	8.066	6.5	Basin Plan Cold Water Fish Habitat
Selected Toxic Pollutants					
Cadmium in Sediment	1.5	1.5	1.5	9.6	NOAA
Copper in Sediment	8.5	8.5	8.5	270	NOAA
Lead in Sediment	2	2	2	218	NOAA
Mercury in Sediment	0.029	0.029	0.029	0.71	NOAA

units for conventional pollutants= mg/l

units for metals= ppm (ug/g)

Data sampled:2001-2003

Toxic Pollutant data sampled June, 2000

Source: Central Coast Ambient Monitoring Program (www.ccamp.org) accessed January, 2006

Critical
Cautionary
Acceptable
na

# Selected Water Quality Data Site: Oso Flaco Creek

Selected Pollutant	Maximum	Minimum	Mean	Acceptable Level	Reference				
Selected Conventional Pollutants									
Ammonia as N, Total	75.6	0	7.5	2.4	California Ocean Plan Daily Max				
Ammonia as N, Unionized	2.117	0	0.344	0.025	Basin Plan General Objective				
Fecal Coliform	35,000	1	3,586	400	Basin Plan Water Body Contact Recreation				
Coliform, Total	190,000	199	61,425	10,000	Basin Plan Marine Water Contact Recreation				
Nitrate as N	70.2	23.8	37	10	Basin Municipal and Domestic Supply				
Nitrate as NO3	312	106	165	45	Basin Municipal and Domestic Supply				
Nitrite as N	0.54	0.005	0.118	1	EPA Primary Max Contaminant Level				
Oxygen, Dissolved (DO)	11.1	7.4	8.7	7	Basin Plan Cold Water Fish Habitat				
Phosphorus	1.42	0.29	0.724	na	na				
Suspended Solids, Total	2,900	10	306	na	na				
рН	8.43	7.45	7.836	6.5	Basin Plan Cold Water Fish Habitat				

units for conventional pollutants= mg/l

units for metals= ppm (ug/g)
Data sampled: 2000-2001

Source: Central Coast Ambient Monitoring Program (www.ccamp.org) accessed January, 2006

	Critical
	Cautionary
	Acceptable
	na

# **Selected Water Quality Data** Site: Little Oso Flaco Creek

Selected Pollutant	Maximum	Minimum	Mean	Acceptable Level	Reference
Selected Conventional Pollutant	s				
Ammonia as N, Total	0.15	0.01	0.069	2.4	California Ocean Plan Daily Maximum
Ammonia as N, Unionized	0.006	0	0.002	0.025	Basin Plan General Objective
Fecal Coliform	24,000	1	2,314	400	Basin Plan Water Body Contact Recreation
Coliform, Total	127,000	800	21,653	10,000	Basin Plan Marine Water Contact Recreation
Nitrate as N	48.8	26.5	34.5	10	Basin Municipal and Domestic Supply
Nitrate as NO3	217	118	154	45	Basin Municipal and Domestic Supply
Nitrite as N	0.144	0.005	0.06	1	EPA Primary Max Contaminant Level
Oxygen, Dissolved (DO)	13.6	5.6	9.2	7	Basin Plan Cold Water Fish Habitat
Phosphorus, Total	0.26	0.14	0.203	na	na
Suspended Solids, Total	374	5	51	na	na
рН	8.28	7.36	7.816	6.5	Basin Plan Cold Water Fish Habitat
Selected Toxic Pollutants	1				1 1
Cadmium in Sediment	0.1	0.1	0.1	9.6	NOAA
Copper in Sediment	33	33	33	270	NOAA
Lead in Sediment	20	20	20	218	NOAA
Mercury in Sediment	0.037	0.037	0.037	0.71	NOAA

units for conventional pollutants= mg/l units for metals= ppm (ug/g) Data sampled: 2000-2001 Toxic Pollutant data sampled on June 1, 2000

Source: Central Coast Ambient Monitoring Program (www.ccamp.org) accessed January, 2006



# STATE OF CALIFORNIA DEPARTMENT OF PARKS AND RECREATION OFF-HIGHWAY MOTOR VEHICLE RECREATION DIVISION OCEANO DUNES DISTRICT OCEANO DUNES STATE VEHICULAR RECREATION AREA AND PISMO STATE BEACH

# **ORDER NO. OHV-554-1-06**

# August 29, 2006

- 1. The following lands operated by the Oceano Dunes District have motor vehicle operation restrictions: Pismo State Beach, north from Grand Avenue, where posted, to the Pismo Beach Pier; That portion of Pismo State Beach operated as part of Oceano Dunes SVRA south from the vehicle prohibition posting at Grande Avenue to beach marker post #2; That portion of Pismo State Beach and Oceano Dunes SVRA south from beach marker post #2 to the southern boundary of the riding area; That portion of Oceano Dunes SVRA, known as the Oso Flaco Lake Natural Area, south from the southern boundary of the riding area to the southern boundary of the SVRA; Any area permanently or temporarily fenced or posted closed to vehicle operation within the allowed riding areas. The restrictions for each area are as follows:
- 2. <u>Pismo State Beach, north from Grand Avenue, where posted, to the Pismo Beach Pier</u>: Motor vehicle operation is prohibited.
- 3. That portion of Pismo State Beach operated as part of Oceano Dunes SVRA south from the vehicle prohibition posted at Grande Avenue to beach marker post #2: Only street legal vehicles may be operated in this area. It is prohibited to cross Arroyo Grande Creek in any other manner then by crossing the creek as close to the ocean waterline as possible and parallel to the ocean waterline. Driving upstream or downstream in the creek channel or in any other manner in the creek channel is prohibited. If the creek crossing is posted "closed", crossing the creek is prohibited.
- 4. That portion of Pismo State Beach and Oceano Dunes SVRA south from beach marker post #2 to the southern boundary of the riding area: Street legal and non-street legal vehicles, with appropriate off-highway motor vehicle registration, may be operated in this area.
- 5. That portion of Oceano Dunes SVRA, known as the Oso Flaco Lake Natural Area, south from the southern boundary of the riding area to the southern boundary of the SVRA: Motor vehicle operation is prohibited.

- 6. Any area permanently or temporarily fenced or posted closed to vehicle operation within the allowed riding areas: Motor vehicle operation is prohibited.
- 7. Exceptions to this order may only be given in writing by the District Superintendent of the Oceano Dunes District, 576 Camino Mercado, Arroyo Grande, CA 93420, (805) 473-7230.
- 8. Nothing herein shall affect any existing private contract, or property rights.
- 9. Nothing herein shall be construed in derogation of other provisions of law.

Andrew Zilke
District Superintendent

Authority: State of California Public Resources Code Section 5003 and Section 5003.5, California Code of Regulations, Title 14, Section 4326(a) and Section 4455.

State of California Department of Parks and Recreation

Oceano Dunes Alternative

Access Study

# **Comparative Ranking of Policy Consistency**

The table ranks the policy consistency of each of the alternatives from 1 to 5, with 1 being the most consistent with policy, and 5 being the least consistent with policy.

Topic	Policy Requirement					Consistency Rating				
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Coastal Access	LCP Shoreline Access Policy 1: Protection of Existing Access: Public prescriptive rights may exist in certain areas of the county. Development shall not interfere with the public's right of access to the sea where acquired through historic use or legislative authorization	1	1	1	1	1	1	1	1	1
Coastal Access	LCP Shoreline Access Policy 3: Access Acquisition: In implementing the above policies, purchase in fee (simple) is to be used only after all other less costly alternatives have been studied and rejected as inappropriate or infeasible	1	2	2	3	4	1	5	1	1
Coastal Access	LCP Shoreline Access Policy 4: Provision of Support Facilities and Improvements: Facilities necessary for public access shall be provided. This may include parking areas, restroom facilities, picnic tables or other such improvements	1	1	1	1	1	1	1	1	1
Coastal Access	LCP Shoreline Access Policy 6: Public Safety: The level and intensity of shoreline access is to be consistent with public safety concerns related to bluff stability, trail improvements as well as the provision of adequate facilities such as signs, fences and stairways.	1	1	1	1	1	1	1	1	1

Topic	Policy Requirement		Consistency Rating							
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Coastal Access	LCP Shoreline Access Policy 7: Development of Uniform Access Signs: A uniform signing program should be developed. Such signs would assist the public in locating and recognizing access points. Where agriculture and sensitive habitats are located, signs may be posted indicating the permitted level of access, the restrictions on access, and a description of the sensitive habitat resources.	1	1	1	1	1	1	1	1	1
Coastal Access	LCP Shoreline Access Policy 10: Protection of Property Rights and Privacy: The acquisition of rights for access and view purposes and other uses by the public should be consistent with the protection of the property and use rights of property owners	1	2	2	3	2	1	1	1	1
Coastal Access	SCLCP Rural Area Program 4: Dune and Beach Access: The County should work with the State to provide for improved access corridors to the dunes and beach areas.	1	1	1	1	1	1	1	1	1
Coastal Access	SCLCP Recreation Standard 5: Access Control: All access points to [ODSVRA] will be controlled. Primary access for off- road vehicles into the dunes will be as indicated in Coastal Development Permit No. 4-28- 30A.	1	1	1	1	1	1	1	1	1

Topic	Policy Requirement					Consistency Rating	ı			
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 1: Land Uses Within or Adjacent to Environmentally Sensitive Habitats: New development within or adjacent to locations of environmentally sensitive habitats (within 100 feet unless sites further removed would significantly disrupt the habitat) shall not significantly disrupt the resource. Within an existing resource, only those uses dependant on such resources shall be allowed within the area	1	3	3	3	4	5	5	3	3
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 2: Permit Requirement: As a condition of permit approval, the applicant is required to demonstrate that there will be no significant impact on sensitive habitats	1	5	5	5	5	5	5	2	3
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 7: Protection of Environmentally Sensitive Habitats: Coastal wetlands are recognized as environmentally sensitive habitat areas. The natural ecological functioning and productivity of wetlands and estuaries shall be protected, preserved, and where feasible, restored.	1	1	1	5	4	5	5	2	5

Topic	Policy Requirement					Consistency Rating	ı			
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 15: Vehicle Traffic in Wetlands: No vehicle traffic shall be permitted in wetlands. This shall not restrict local and state agencies or the property owner from completing the actions necessary to accomplish a permitted use within the wetland. Pedestrian traffic shall be regulated and incidental to permitted uses.	4	4	1	1	1	5	5	3	3
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 20: Coastal Streams and Riparian Vegetation: Coastal streams and adjoining riparian vegetation are environmentally sensitive habitat areas and the natural hydrological system and ecological function of coastal streams shall be protected and preserved.	3	3	3	3	1	1	1	3	2
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 21: Development in or Adjacent to a Coastal Stream: Development in or within the watershed (that portion within the coastal zone) shall be sited and designed to prevent impacts which would significantly degrade the coastal habitat and shall be compatible with the continuance of such habitat areas. This shall include evaluation of erosion and runoff concerns.	2	4	4	4	3	4	4	3	5

Topic	Policy Requirement		Consistency Rating								
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)	
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 26: Riparian Vegetation: Cutting or alteration of naturally occurring vegetation that protects riparian habitat is not permitted Minor incidental public works projects may also be permitted where no feasible alternative exists including but not limited to utility lines, pipelines, driveways and roads.	1	4	4	4	1	1	1	1	1	
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 29: Protection of Terrestrial Habitats: Designated plant and wildlife habitats are environmentally sensitive habitat areas and emphasis for protection should be placed on the entire ecological community.	2	3	3	3	5	5	5	3	3	
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 30: Protection of Native Vegetation: Native trees and plant cover shall be protected wherever possible. Native plants shall be used where vegetation is removed.	1	2	2	2	4	4	4	1	1	
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 35: Protection of Vegetation: Vegetation which is rare or endangered or serves as cover for endangered wildlife shall be protected against any significant disruption of habitat value.	1	5	5	5	5	5	5	1	1	

Topic	Policy Requirement					Consistency Rating				
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Environmentally Sensitive Habitats	DPROM 0306.4: Watershed and Stream Protection Policy: Achieve the protection of watershed and stream features primarily by avoiding adverse impacts to streambank and bed morophology, to floodplain features When conflicts between infrastructure and stream processes are unavoidable, first consider relocating or redesigning facilities, rather than modifying fluvial processes and manipulating streams	2	3	4	4	1	5	5	3	3
Environmentally Sensitive Habitats	DPROM 0306.7: Wetlands Management Policy. Prevent destruction, loss, or degradation of wetlands	1	1	1	1	4	5	5	3	2
Water Quality	DPROM 0306.91: Water Quality and Quantity Policy. Protect both surface water and groundwater quality and quantity by avoiding or eliminating unnatural degredation of waters in the State Park System	2	3	3	3	3	5	5	2	2
Environmentally Sensitive Habitats	DPROM 0310.1.1: Plant Management Policy. Acquire, preserve, and interpret outstanding examples of native California species The Department will preserve and restore the natural abundance, diversity, dynamics; Protect state and federally-listed threatenened, elndangered, rare, or otherwise sensitive species; Minimize negative human impacts on native plants, populations, communities	2	3	5	5	5	5	5	2	2

Topic	Policy Requirement											
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street		ConocoPhillips	Oso Flaco Lake					
Environmentally Sensitive Habitats	DPROM 0310.5.1: Plant Management Policy.Protect rare plants and their habitats	1	5	5	5	5	5	5	1	1		
Environmentally Sensitive Habitats	LCP Environmentally Sensitive Habitats Policy 36: Protection of Dune Vegetation: Disturbance or destruction of any dune vegetation shall be limited to those projects which are dependent upon such resources and where no feasible alternatives exist and then shall be limited to the smallest area possible.	1	5	5	5	5	5	5	1	1		
Environmentally Sensitive Habitats	DPROM 0311.2 Animal Management. In managing animals and animal habitats, the Department will preserve, protect and restore the natural abundance, diversity, dynamicsMaintain functional linkages to other natural areas, Minimize negative human impacts on native animals, populations, communities, and ecosystems	3	3	3	3	5	5	5	2	2		
Environmentally Sensitive Habitats	DPROM 0311.5.2.1. Special Animal Policy: The Department will conserve listed species and avoid detrimental effects	1	4	4	4	5	5	5	1	1		
Environmentally Sensitive Habitats	DPR0311.5.2.3. Park Projects and Animals of Special Concern:The Department will attempt to modify the project to avoid impacts to populations of sensitive animals	1	5	5	5	5	5	5	1	1		

Topic	Policy Requirement					Consistency Rating				
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Environmentally Sensitive Habitats	DPR0311.6.1.1. Anadromous Fish Policy: The Departmentwill support the goals of the Salmon, Steelhead Trout and Anadromous Fisheries Program Act To improve and protect conditions in anadromous streams. Anadromous streams on State Park System lands will be managed to restore or protect native anadromous fish and their habitat.	2	3	3	2	1	1	1	2	2
Environmentally Sensitive Habitats	DPR0311.6.2. Aquatic Habitat and Animal Restoration. Necessary in-stream structures in State Park waterways will not impede movements of native aquatic biota upstream or downstream	1	2	2	1	1	1	1	1	2
Environmentally Sensitive Habitats	SCLCP Combining Designations Program 8: Off- road Vehicle Use: The State Department of Parks and Recreation should prohibit ORV use in the area immediately adjoining the [Oso Flaco] lakes except on designated roads and trails.	1	1	1	1	1	5	5	1	1
Environmentally Sensitive Habitats	SCLCP Recreation Standard 6: Noise Control: Noise control measures shall be required for ORV use in proximity to natural preserve areas.	1	4	4	4	1	1	1	1	1

Topic	Policy Requirement		Consistency Rating								
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)	
Environmentally Sensitive Habitats	SCLCP Recreation Standard 8: Habitat Protection: Natural buffer areas for sensitive habitat areas shall be identified and fenced, consistent with the provisions of Coastal Development Permit No. 4-28-30A and the stabilized dune areas Fences or other appropriate techniques shall be maintained where needed to preclude vehicular access in such areas as the Dune Lakes, Oso Flaco Lake, and natural areas in the eastern portion of the park and lease area.	1	1	1	1	1	3	3	1	1	
Agriculture	LCP Agriculture Policy 1:  Maintaining Agricultural Lands: Prime agricultural land shall be maintained, in or available for, agricultural production unless: 1) agricultural use is already severely limited by conflicts with urban uses; or 2) adequate public services are available to serve the expanded urban uses; and 3) development on converted agricultural land will not diminish the productivity of adjacent prime agricultural land.	1	2	2	5	1	5	4	1	1	
Agriculture	Other lands (non-prime) suitable for agriculture shall be maintained in or available for agricultural production unless: 1) continued or renewed agricultural use is not feasible; or 2) conversion would preserve prime agricultural land; and 3) the permitted conversion will not adversely affect surrounding agricultural uses	1	2	2	5	1	5	4	1	1	

Topic	Policy Requirement									
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street		ConocoPhillips	Oso Flaco Lake			Beach Bridge 2 (on concrete piles)
Visual and Scenic Resources	LCP Visual and Scenic Resources Policy 10: Development on Beaches and Sand Dunes: Prohibit new development on open sandy beaches, except facilities required for public health and safety (e.g. beach erosion control structures). Limit development on dunes to only those uses which are identified as resource dependant in the LCP. Require permitted development to minimize visibility and alterations to the natural landform and minimize removal of dune stabilizing vegetation.	1	4	4	4	5	4	4	2	5
Visual and Scenic Resources	DPR0312.2. Scenic Values and Viewshed: The principal objective in the management of scenic areas is preservation of the quality of the visual environment Identify and protect scenic resources and qualities; Avoid or minimize modifications to scenic resources;	2	5	5	5	5	5	5	2	4
Visual and Scenic Resources	DPR0312.2.1 Secnic Protection Policy. It is the policy of the Department that in each State Park System unit, environmental quality will be such that visitors are aware of being in a place of special merit because of their surroundings	2	4	4	4	5	5	5	1	1

Topic	Policy Requirement	Consistency Rating								
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Visual and Scenic Resources	DPR 0312.3 Lightscape:The Department will protect natural darkness and other components of the natural lightscape in parks The Department will not use artificial lighting in sensitive locations where the presence of artificial light will disrupt dark-dependent natural resources components of a park.	1	5	5	5	5	5	5	1	1
Noise	DPR 0312.4.1. Soundscape Protection Policy: The Department will preserve, to the greatest extent possible, the natural soundscapes of parks from degredation due to noiseThe Department will take action to prevent or minimize all noise that adversely affects the natural soundscape or natural resources (e.g. loud motorized equipment during critical mating and rearing periods).	3	5	5	5	5	5	5	1	1
Hazards	LCP Hazards Policy 2: Erosion and Geologic Stability: New development shall ensure structural stability while not creating or contributing to erosion or geological instability.	1	1	1	1	5	4	4	2	4
Archaeology	OSP Standard 3: Runoff and Sediment Control:Install pollution control devices such as oil and water separators in parking lots and other areas where fuels and other pollutants accumulate	1	1	1	1	1	1	1	1	1

Topic	Policy Requirement			Consistency Rating						
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Archaeology	LCP Archaeology Policy 1: Protection of Archaeological Resources: The county shall provide for the protection of both known and potential archaeological resources	1	5	5	5	2	4	4	1	1
Archaeology	LCP Archaeology Policy 4: Preliminary Site Survey for Development within Archaeologically Sensitive Areas: Development shall require a preliminary site survey by a qualified archaeologist knowledgeable in Chumash culture prior to a determination of the potential environmental impacts of the project.	.1	1	1	1	1	1	1	1	1
Archaeology	SCLCP Recreation Standard 12: Archaeological Resource Preservation: To ensure archaeological resource protection, the State Department of Parks and Recreation should provide the fullest protection by fencing all known sites.	1	5	5	5	1	5	1	1	1

Topic	Policy Requirement	Consistency Rating								
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Camping	SCLCP Recreation Standard 7: Alternative Camping Areas: Alternative camping areas subject to the numerical limitations of Coastal Development Permit No. 4-28-30A may be appropriate in the dunes area and beach. These are dependant upon assurances that scattered sites will still allow for adequate environmental protection throughout the dunes.	1	1	1	1	1	1	1	1	1
Utilities	ALUP Utilities Condition 1: Power lines should be undergrounded if of sufficient height and placement as to cause a hazard to aircraft.	1	2	2	1	1	1	1	1	1
Natural Preserve Designation	PismoDunesGP: Natural Preserve: Pismo Dunes Natural Preserve is established to perpetuate in essentially natural condition a substantial tract of sand duneswhere they may easily be visited and enjoyed by interested persons. Full protection is also afforded to all archaeological sites located within the unit and to all natural vegetation and wildlife occurring within it It will be kept free not only of roads, structures, and other facilities, but also of dune stabilization projects of all kinds. Motorized vehicles of any type, except in cases of extreme emergency, are prohibited.	1	5	5	5	1	1	1	1	1

State of California Department of Parks and Recreation

Oceano Dunes Alternative

Access Study

Topic	Policy Requirement	Consistency Rating								
		Existing Entrances (Grand and Pier)	Creek Road	Ocean Street	Silver Spur Place	ConocoPhillips	Oso Flaco Lake	Little Oso Flaco Lake	Beach Bridge 1 (Movable)	Beach Bridge 2 (on concrete piles)
Natural Preserve Designation	DPROM 0304.2.5: Natural Preserves shall be managed to allow natural dynamics of ecological interaction to continue without interference.	1	5	5	5	1	1	1	1	1
Average rating		1.35	2.92	2.92	3.10	2.69	3.27	3.23	1.48	1.73

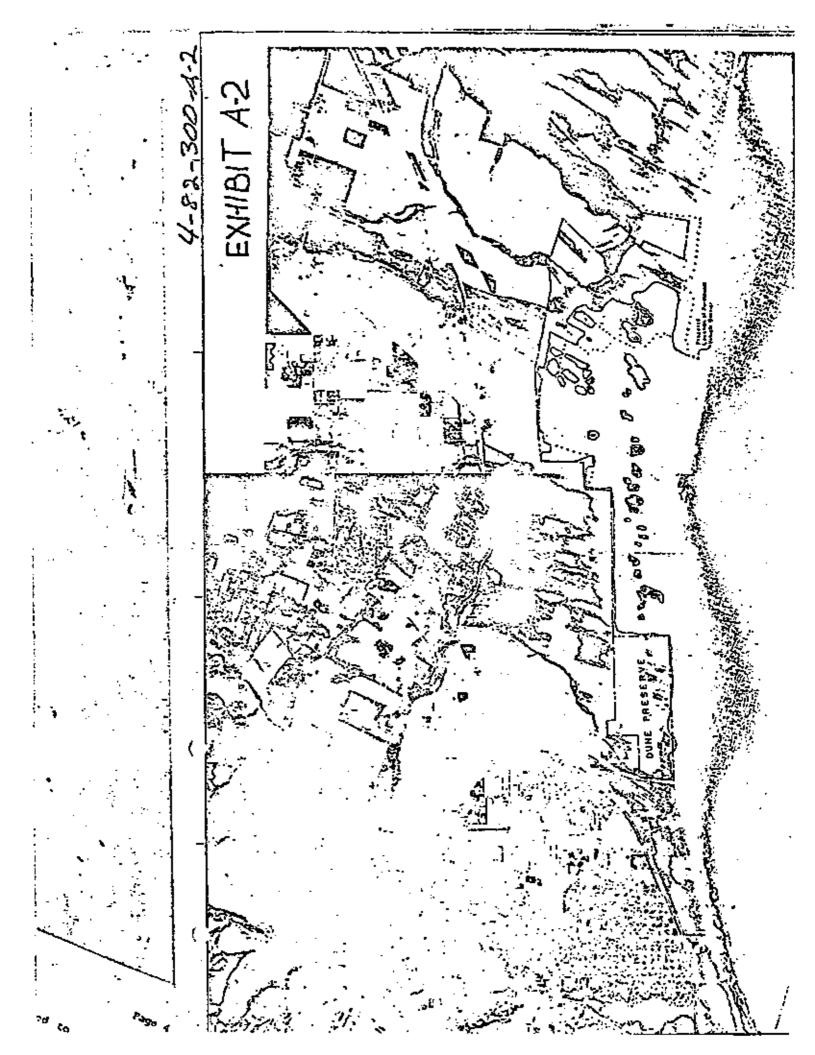
Abbreviations: Airport Land Use Plan (Oceano) = ALUP County of San Luis Obispo Coastal Plan Policies = LCP

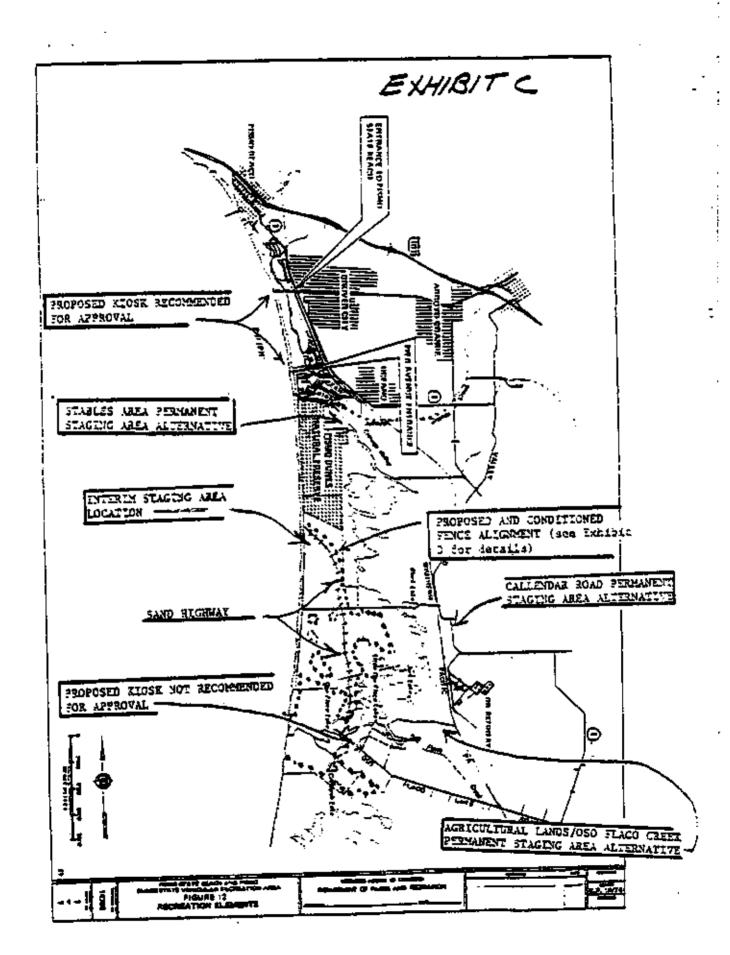
Oceano Specific Plan = OSP

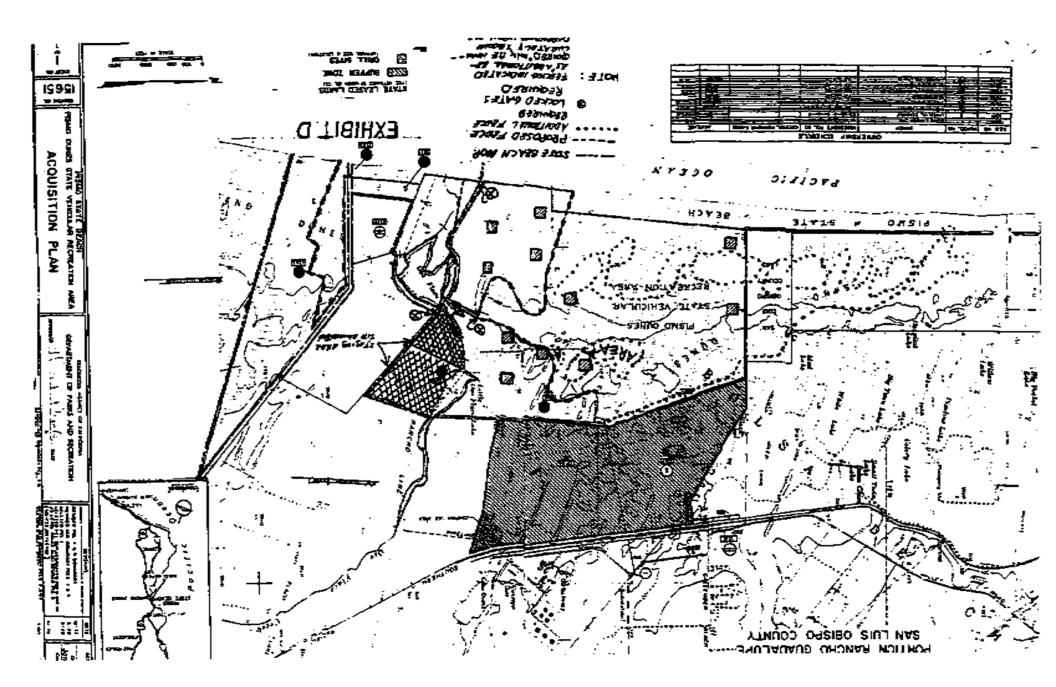
South County Planning Area Land Use Element and LCP = SCLCP

General Development Plan = GDP

Department of Park and Recreation Operations Manual Natural Resources Section = DPROM







# FIGURE 4 OFF-ROAD VEHICLE USE AREAS LEGEND LITTLE CORCOPSIS HILL OHY ACCESS CORRIDOR (Schematic) MAIDENFORM FLATS BOY SCOUT CAMP



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May 1, 2019

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Gary E. Willey Air Pollution Control Officer SLO APCD 3433 Roberto Court San Luis Obispo, CA 93401

Dan Canfield Acting Deputy Director, OHMVR Division California State Parks P.O. Box 942896 Sacramento, California 94296-0001

Subject: Response to and Comments on Revised Oceano Dunes SVRA Draft Particulate Matter Reduction Plan dated March 28, 2019 Draft Particulate Matter Reduction Plan (DPMRP)

FRIENDS OF OCEANO DUNES, INC. ("FRIENDS"), is a California not-for-profit corporation representing approximately 28,000 members and users of Oceano Dunes State Vehicular Recreation Area ("Oceano Dunes SVRA") located near Pismo Beach, California. According to its Articles of Incorporation, FRIENDS is formed for the express purpose of preserving and developing recreational uses in the Oceano Dunes area of San Luis Obispo County, California.

FRIENDS is deeply concerned about (1) the DPMRP; (2) the supporting information from the Scientific Advisory Group (SAG) letter dated February 25, 2019; and (3) the February 25, 2019 letter from Gary Willey (APCO) to Mr. Canfield (State Parks).

Based on these submissions, the regulatory agencies and their consultants are no closer to understanding the root cause of the dust, or the complete inventory of dust sources.

The regulatory agencies have no proven models or corrective measures to mitigate the dust on the Nipomo Mesa. All of the suggestions to date fail to abide by the California State

Parks Department of Parks and Recreation's (DPR) legislative mandate to provide off-road recreation and camping at the Oceano Dunes Stave Vehicular Recreational Area (ODSVRA). See California Resources Code sections 5090.02 and 5090.43 (shown below, emphasis added).

## PRC 5090.02

- (c) Accordingly, it is the intent of the Legislature that:
- (1) Existing off-highway motor vehicle recreational areas, facilities, and opportunities should be expanded and be managed in a manner consistent with this chapter, in particular to maintain sustained long-term use.
- (2) New off-highway motor vehicle recreational areas, facilities, and opportunities be provided and managed pursuant to this chapter in a manner that will sustain long-term use.

PRC 5090.43 (a) State vehicular recreation areas consist of areas selected, developed, and operated to provide off-highway vehicle recreation opportunities. State vehicular recreation areas shall be selected for acquisition on lands where the need to establish areas to protect natural and cultural resources is minimized, the terrain is capable of withstanding motorized vehicle impacts, and where there are quality recreational opportunities for off-highway motor vehicles. Areas shall be developed, managed, and operated for the purpose of providing the fullest appropriate public use of the vehicular recreational opportunities present, in accordance with the requirements of this chapter, while providing for the conservation of cultural resources and the conservation and improvement of natural resource values over time.

# FRIENDS will focus on the following 9 areas:

- 1. Model(s) accuracy is it timely, representative, complete and accurate (verified and validated)
- 2. PiSWERL Measurements
- 3. Dust Inventory collected near the ODSVRA
- 4. 1930s vegetation improperly used as the "gold standard"
- 5. Vegetation restoration
- 6. Deflation plane and wind erosion
- 7. SAG language to allow non-native vegetation
- 8. Results from vegetation versus meteorological effects?
- 9. DPR, APCD & SAG scope and focus
- 10. Disclosure statements for Nipomo Mesa

# 1. Model(s) Accuracy:

FRIENDS supports the use of a model for determining dust mitigation as long as the model is timely, representative, complete and accurate. The accuracy of the model must be verified and validated.

Currently there are two models being used to determine dust mitigation, the California Air Resources Board (CARB) model and the Desert Research Institute (DRI) model. Both of these models use the same base data from 2013.

The 2013 data is not representative of normal conditions from a meteorological perspective that we will discuss in the following section.

# Meteorological:

The data taken in 2013 from the PiSWERL measurements have never been updated or calibrated for metrological conditions such as rainfall and wind patterns, which are critical to its accuracy and usefulness. 2013 is one of the worst droughts in the past 143 years (Ref Fig. 1).



Fig. 1: 2013 - Lowest Rainfall in 143 years (CALCOASTNEWS.COM Oct 27, 2013).

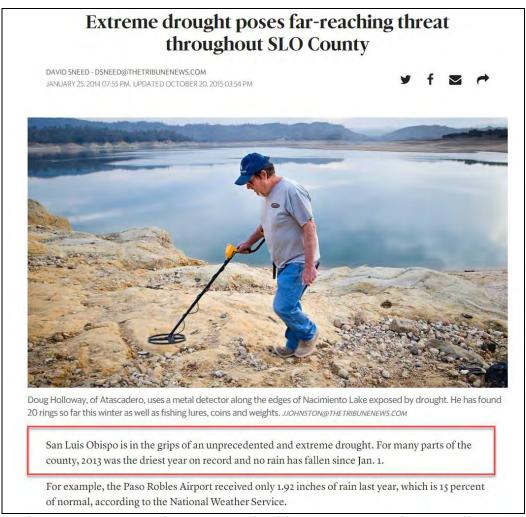


Fig. 2: Extreme Drought, 2013 was the driest year on record (SLO Tribune).

How does using 2013 data in the CARB or DRI model from the lowest rainfall in 143 years and viewed as "unprecedented and extreme drought" represent realistic and representative data? **Answer...it doesn't**.

Both the CARB and DRI model are based on an absolute worst case rainfall that does not represent current or normal conditions, and therefore it fails all tests for reasonableness.

The APCD even stated that the drought does have an impact on particulate matter (Fig. 3 and Fig. 4).

LUCAL

# SLO County gets failing grades for air quality, but officials say ratings are wrong

y f 2 0

By Monica Vaughan

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APRIL 20, 2017 06:56 PM, UPDATED APRIL 20, 2017 06:56 PM



Beachgoers at Oceano Dunes State Vehicular Recreation Area in 2016. DAVID MIDDLECAMP DMIDDLECAMP@THETRIBUNENEWS.COM

Air pollution in the Nipomo Mesa caused by dust blowing from dunes contributed to San Luis Obispo County receiving a failing grade for air quality from the American Lung Association, county air pollution control officials said.

The county again received an F for ozone pollution and failed for the first time with a D for particle pollution in the association's annual State of the Air report, which looked at air quality statewide for 2013-15.

But county air pollution control officials said the ratings are "not accurate" because the way the association compiles statistics paints a confusing picture. The increase in particle pollution during the years measured was small, and is not countywide.

Fig. 3 – APCD said American Lung Association ratings are "not accurate"

The American Lung Association said particle pollution — microscopic bits of material that can damage the lungs — spiked in the county in the years 2013 to 2015 to the highest levels ever measured in the 18 years the annual report has been issued. Analysts attributed the increase to the prolonged drought.

"We have seen higher particle pollution because of the drought, but they have not been exceeding state or federal levels except in the Nipomo Mesa area, downwind from where the problem is due to off-road vehicle activity on the Oceano Dunes," Allen said.

We have seen higher particle pollution because of the drought, but they have not been exceeding state or federal levels except in the Nipomo Mesa area.

Larry Allen, executive director of the San Luis Obispo County Air Pollution Control District

Fig. 4 – <u>APCD admits highest levels in 18 years recorded in 2013 and attributed it to the drought</u>, although the APCD fails to acknowledge the drought is likely impacting the ODSVRA.

A scientific paper published in 2018 examines the relationship between drought conditions and fine dust particulate matter (Fig. 5).

# Drought-sensitivity of fine dust in the US Southwest: Implications for air quality and public health under future climate change

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Keywords: air quality, climate impacts, mineral dust, particulate matter, droughts

Supplementary material for this article is available online

# Abstract

We investigate the present-day sensitivity of fine dust levels in the US Southwest to regional drought conditions and use the observed relationships to assess future changes in fine dust levels and associated health impacts under climate change. Empirical Orthogonal Function analysis reveals that the most dominant mode of fine dust interannual variability for each season consists of a pattern of large-scale co-variability across the Southwest. This mode is strongly correlated to the Standardized

Fig. 5. 2018 Research paper <a href="https://iopscience.iop.org/article/10.1088/1748-9326/aabf20/pdf">https://iopscience.iop.org/article/10.1088/1748-9326/aabf20/pdf</a>

This 2018 research paper concluded: (Fig. 6).

# Discussion and conclusions

This study quantifies the impacts of hydroclimate changes on airborne fine dust pollution and public health risks in the US Southwest during the late-21st century (2076–2095) under two climate change regimes. We demonstrate that the 2000–2015 interannual variability of monthly mean fine dust concentrations across the southwestern United States is influenced by drought conditions in local and surrounding areas, including large regions of the four North American deserts. Based on empirically-derived relationships between fine dust and the 2 month Standardized Precipitation

Fig. 6 – Monthly fine dust is influenced by drought conditions.

# The SAG stated:

Page 18: "Until now, the full suite of required observational data have only been collected during the period of May-July 2013. In order for the DRI dispersion model to serve as a useful tool for assessing the effectiveness of future dust mitigation activities at ODSVRA, the SAG recommends that a monitoring campaign to provide ongoing collection of observational data on meteorology, topography, dust emissivity, and PM10 mass concentrations be established immediately."

The SAG is expressing a similar concern – the models, whether CARB or DRI, only use one historic year as the basis, and in order for the models to be meaningful, they need to be updated.

# The SAG further states on page 18:

"The SAG recommends immediate redeployment and ongoing operation of a comparable network of these instrumented meteorological towers, to inform future DRI dispersion modeling scenarios."

If the model was complete and accurate, verified and validated...all the additional data would not be needed.

# The SAG continues on page 20:

"The SAG recommends that further studies be conducted to more accurately assess fractional emissions reductions associated with back dune planting, foredune restoration, and other dust control schemes. Such studies could include both localized deployments of Sensits and saltation traps and geomorphic change detection through repeat UAS surveys. These studies should consider not only the direct effect of mitigation schemes on vegetated areas, but also the emissivity response of downwind locations in the shadow of restored areas due to modifications to boundary layer airflows."

The SAG focuses on the need to improve the model by collecting more representative data, as stated later on page 20:

"Thus, the SAG recommends that further sensitivity studies of the kind described in PMRP Attachment 2 be performed to further refine our understanding of observational data

requirements for the DRI dispersion model. After initial sensitivity studies have been performed, the SAG suggests that the specific components of observational monitoring campaigns be reassessed. Such analyses could indicate the need for additional measurements, but they could also justify the cost-saving removal of redundant observational components. For example, further sensitivity studies may demonstrate that 3-meter meteorological towers (rather than full 10-meter towers) may provide sufficient observational data for assimilation into the DRI dispersion model (this is suggested by the analysis in PMRP Attachment 3."

The SAG then states at the bottom of page 20:

"The SAG notes that the DRI dispersion model will never provide a perfect representation of the Oceano dunes dust emission dynamics. Nonetheless, additional validation studies could help to improve confidence in use of the model. As new data are collected for assimilation into future DRI dispersion model runs, measured PM10 concentrations at the CDF, Mesa2, and Oso Flaco 21 monitoring stations should regularly be compared to model-predicted PM10 concentrations. Such comparisons could help to build confidence or to reveal flaws in the performance of the DRI dispersion model."

Therefore, the SAG has provided supporting evidence that the model being used is flawed and not representative of the current conditions. As a result, the model in its present form simply can't be used to determine the best methods for reducing the dust emissions.

The SAG continues to raise questions about using only 2013 data:

The SAG states on Page 22 (emphasis added):

"The SAG especially took note of the very small frequency with which wind speeds observed on May 22, 2013, occurred (0.5%) within a 10-year date record bracketing this peak PM10 concentration date. The SAG is interested in diving into this question further, but did not have time during this limited response period. As a result, the SAG recommends that further study of an appropriate baseline period be conducted and reported in each Annual Report for several reasons:

- The relationships between PM10 emissions and average 24-hour downwind concentrations are not linear, given the differential effects on downwind air quality of controls on different portions of open sand areas, and changes in these relationships need to be evaluated in light of each year's mitigation progress;
- The form of the state ambient air quality standard for PM10 is no exceedances of a 50  $\mu$ g/m3 24-hour average concentration, averaged over a minimum of 18 hours of data per midnight-to-midnight period over a calendar year, which is equivalent to an exceedance frequency of up to 0.2% (= 18 hr/8760 hr); and
- <u>The lack of extensive data collected during any other monitoring campaign against which to compare the 2013 database makes selection of this period as the baseline for emission reduction somewhat questionable."</u>

How can the agencies use a model to make predictions that will lead to closing hundreds of acres to riding and camping when the SAG recommends further study? This is the cart before the horse.

This concern of model accuracy and validity was also raised by the APCO.

Page 6 (emphasis added):

"Summary: The model does not capture changes in the wind field caused by mitigation elements, and therefore likely underestimates mitigation effectiveness.

A mitigation element such as a patch of vegetation or an array of fencing or straw bales reduces PM10 emissions by reducing wind shear. If wind shear is reduced within the mitigation element, then logically it must be reduced to some extent in the "shadow" of the element as well. In other words, surface wind speed is slowed over the mitigation element; after the element, the wind speed gradually increases to its original value—the transition is not instantaneous.

This effect is not captured in the model—and presumably it cannot be since the model uses a fixed set of meteorological inputs from 2013—but it likely causes a reduction in downwind PM10 concentrations, as open sand in the lee of mitigation elements experiences somewhat lower wind speeds. Thus, the model likely underestimates mitigation effectiveness. While this probably cannot be fixed, it should at least be noted in the PMRP."

Page 7, the APCO further states (emphasis added):

"A problem with designing mitigations for any one specific day is that if the target day is not representative of typical wind event days, then the resulting mitigations may not be effective on typical days. For example, if the wind direction on May 22 or 23, 2013, was atypical, then mitigations designed to for that wind pattern may not be in the correct locations to influence downwind PM10 levels during typical wind events. Therefore, the District supports the use of an aggregate baseline in place of a single-day baseline. This could be the top ten highest emission days, or even an average of all "wind event days" as defined by some reasonable metric. "

Page 8, the APCO acknowledges that the data set is incomplete (emphasis added): "Section 4.3: 24-Hour PM10 Baseline Concentration Analysis Summary: Characterize the uniqueness of the baseline period.

This section concludes by stating that "focusing dust remediation efforts within this corridor would most effectively result in a reduction of PM10 concentration at CDF, provided meteorological conditions are near-identical to those that occurred on May 22, 2013 [emphasis added]". The District agrees with this observation and suggests the addition of a brief analysis of the day's uniqueness. It is expected that that the wind speed was unusually high, perhaps among the highest recorded, but if wind direction or other parameters were atypical, then it would be important to know this. The analysis in section 4.4.1 notes that wind speeds this high are very unusual, but no information is given about

## the wind direction or other possibly important parameters (humidity, temperature, soil moisture, stability, etc.)

In a previous comment, we suggested using an aggregate of days for the baseline rather than a single day. If this is done, then the analysis could look at how typical or atypical the aggregate is."

DPR discussed the importance of using the model for making decisions regarding the dust control measures.

#### DPR stated on page 3-1:

"The purpose of the modeling is to provide the OHMVR Division, the SAG, and the SLOAPCD with estimates, or predictions, of key baseline and future performance metrics that can be tested, evaluated and compared to actual emissions and/or PM10 concentration measurements, and adjusted as the PMRP is implemented over time. The modeling also provides the means by which the OHMVR Division, the SAG, and the SLOAPCD will predict the ability of proposed dust control measures to successfully achieve the SOA objectives described in Chapter 2. These predictions would then be compared to direct observations, evaluated for performance, and improved as necessary and feasible."

#### DPR further states:

"Scientific experts from the DRI Division of Atmospheric Sciences, with input from the SAG, CARB, and SLOAPCD, developed the PMRP modeling methodology."

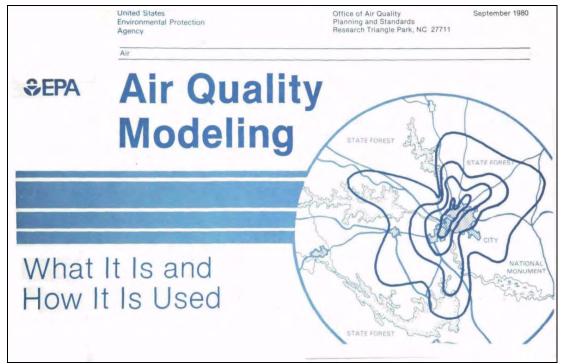
DPR also stated on page 3-12 (emphasis added):

"While air quality models are important tools that are used extensively in environmental impact and regulatory studies, it is important to recognize that <u>models are a simplified</u> representation of the environmental system of interest, which for the PMRP is the emission and dispersion of dust particles from Oceano Dunes SVRA. The veracity of model predictions is determined by how well the physics of the processes involved are captured by the mathematics of the model (i.e., the parameterization) and the quality and availability of the input data used by the model to generate predictions."

#### DPR further stated (emphasis added):

"The USEPA's Guideline on Air Quality Models states "the formulation and application of air quality models are accompanied by several sources of uncertainty." The Guideline describes two specific sources of uncertainty. "Irreducible" uncertainty stems from unknown conditions, which may not be explicitly accounted for in the model, and which are likely to lead to deviations from the actual, observed concentrations for any individual event. "Reducible" uncertainties are caused by uncertainties in the "known" input conditions (e.g., emission characteristics and meteorological data, errors in measured concentrations, and inadequate model physics and formulation."

The Environmental Protection Agency (EPA) has published guidelines on the use of Air Models to ensure "sound regulatory decisions".



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### **Foreword**

The purpose of this brochure is to acquaint the reader with the basic concepts of air quality modeling and its application in air quality management. It is directed to non-technical audiences to explain what models are, how they are used, and what their limitations are as a tool in the air pollution control process. Several publications are listed for those who desire further information.

It should be understood that models are mathematically derived tools. The reliability of predicted air quality estimates is directly dependent upon the detail and quality of the information used in applying the models. Their primary purpose is to serve as an aid in arriving at sound regulatory decisions.

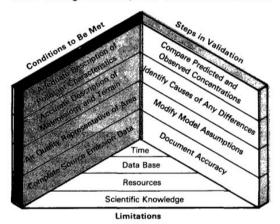
The foreword is pretty clear: "<u>The reliability of the predicted air quality estimates is directly dependent upon the detail and quality of the information used in applying models</u>". This is the main concern of both the CARB and DRI models, they are NOT using sufficient detail and the quality of the information is shown to be not representative.

## Accuracy of Air Quality Modeling, and Decision-Making

#### What determines the adequacy of a model?

A model is considered adequate if it predicts observed pollutant concentrations well. This usually occurs when the model incorporates all of the important physical processes which determine maximum pollutant concentrations.

For example, plumes from short, stubby stacks close to large buildings are known to downwash



at high wind speeds. (A plume caught in disturbed air flow patterns in the wake of a structure reaches the ground quickly and is said to "downwash.") If a model for such a plume does not include this process, it will fail to produce adequate predictions of pollutant concentrations close to the stack.

Modeling adequacy is more difficult to assess in complex situations. The physical processes which are most important may not be clear. If model adequacy is in doubt, validation or calibration studies are required to test the ability of the model to predict observed concentrations.

#### How is a model validated?

A model can be validated if its predictions are directly comparable to detailed air quality observations. When comparisons are made, the following conditions must be met:

- Terrain and meteorological conditions are described adequately in the model.
- Source data are complete and any significant variations are identified.

The EPA is accurate when it states that "a model is considered adequate if it predicts observed pollutant concentrations well. <u>This usually occurs when the model incorporates all of the important physical processes which determine maximum pollutant concentrations</u>".

The EPA also states that "if model adequacy is in doubt, validation or calibration studies are required to test the ability of the model to predict observed concentrations".

As shown above, the APCD, SAG and DPR each agree that more calibration and validation is required for the model....but again, that is the cart before the horse. You can't on one hand say the model is suggesting that DPR close off 500 acres of beach area and then state that the same model needs to collect more data to ensure it is accurate.

Studies and experiments should be undertaken to improve the model validity before closing any more of the ODSVRA.

18

- Pollutant characteristics are well known, including any important chemical reactions or removal processes.
- The pollutants to be addressed must have characteristics similar to those for which the model was developed.
- Air quality data are representative of the area and averaging times simulated, and are accurate and complete.

When these conditions are satisfied, validation of the model consists of the following steps:

- Simulated concentrations are compared with measured data.
- The causes of any differences are identified.
- · Data bases are corrected and improved.
- Inappropriate model assumptions are modified.
- The accuracy of predicted concentrations is documented.

If a statistical evaluation of the results of comparing predicted and observed concentrations indicates that predicted concentrations do not compare well with measured concentrations, then it is likely that one or both of the following problems exist: (1) the source data, meteorological data, or air quality data are not appropriate, reliable, and complete or (2) the model itself is inadequate. Due to limitations in data bases, scientific knowledge, time, and resources, a complete validation is not always possible.

#### What is the expected accuracy of models?

Realistic assumptions used in air quality models are in accordance with experience and scientific theory, but they are at best only approximations. When coupled with the inaccuracies inherent in the source data and the meteorological data used in the model, use of these approximations will sometimes cause a model to either overpredict or underpredict short-term concentrations. When specific meteorological events are considered, model predictions are generally within a factor of 2 of the observed concentrations.

The USEPA Guidelines on page 17 and 18 outline numerous conditions that must be met to allow for comparisons to be made. The following table takes these same conditions and answers if the model complies and why.

Conditions For Comparisons	CARB/DRI Model Comply? (Yes or No)
Terrain and meteorological conditions are described adequately in the model.	No – terrain is from limited data set and the meteorological data is not representative due to limited data set from 2013.
Source data are complete and any significant variations are identified.	No – Source data is not complete since it only uses a small data set from 2013 which is not representative due to severe drought.
<ul> <li>Pollutant characteristics are well known, including any important chemical reactions or removal processes.</li> </ul>	No – pollutant characteristics are not well known. The CDF samples cannot be broken down to what is normal background material, ODSVRA or other emitters like the ocean contribution. A full inventory is needed.
<ul> <li>The pollutants to be addressed must have characteristics similar to those for which the model was developed.</li> </ul>	Yes – the model is "similar to those for which the model was developed"
<ul> <li>Air quality data are representative of the area and averaging times simulated, and are accu- rate and complete.</li> </ul>	No – the data was gathered in 2013 and is not "representative" due to a severe drought in that year.

The model does not comply, and therefore it should not be used for comparison purposes.

The USEPA page 18 states that the conditions must be met prior to completing any validation.

When these conditions are satisfied, validation of the model consists of the following steps:

- Simulated concentrations are compared with measured data.
- The causes of any differences are identified.
- · Data bases are corrected and improved.
- Inappropriate model assumptions are modified.
- The accuracy of predicted concentrations is documented.

## How should air quality data be used to verify model-based decisions?

Air quality data are used to verify model-based decisions in a broad sense by indicating if the NAAQS are maintained, or if further progress is made toward attaining the standards in non-attainment areas. In a more specific sense, air quality data may also be used to test the applicability of the modeling, and thereby either lend support to the predictions of the model, or provide a basis for re-evaluating the modeling assumptions employed.

If a detailed emissions and meteorological data base is collected in conjunction with monitored air quality data, then a comparison of model predictions, using actual emission rates, with the observed pollutant concentrations is possible. Such a comparison may lead to a recommendation for the use of an alternate model. When it is evident that the model consistently underpredicts the highest of the observed concentrations, the decision to consider alternate modeling techniques is clear, provided the emissions or meteorological data bases are not at fault.

When the comparison shows that the model consistently overpredicts observed concentrations, the decision to recommend a different model may be considered.

Effective air quality decisions must be based on realistic modeling estimates. At times, selection of the most appropriate, realistic modeling technique is very difficult to make. Collection and use of high quality monitoring data are essential in evaluating decisions based on modeling data alone.

## When are air quality data more acceptable than models in decision-making?

Air quality modeling is a tool used to estimate maximum expected pollutant concentrations over a wide range of meteorological conditions with the expectation that pollutant emission rates will at times reach their maximum allowed limits. Air quality data, on the other hand, represent pollutant concentrations measured when emission rates are at their actual levels. These rates could be below maximum allowed rates for much of the time. If modeling shows that no violation

The USEPA is very clear, "<u>Effective air quality decisions must be based on realistic modeling estimates</u>".

The USEPA further states, "Collection and use of high quality monitoring data are essential in evaluating decisions based on modeling data alone".

#### **Model Conclusions:**

As shown in this section, in order for a model to be used for comparison purposes it must be based on accurate, timely data that is representative and then verified and validated. Both the CARB and DRI models are based on a small sample of data taken in 2013 that is not representative, not timely or accurate and the models have never been verified or validated. Even the key players trying to use the model for predicting mitigations (DPR, APCD and SAG) each agree that more needs to be done to improve the model.

Friends demands that the model be updated, verified and validated before it is used to close hundreds of acres of camping and recreational area....especially since there has been no suggestion that any mitigation can be reversed if it is deemed not working or not needed. Adaptive management needs to include reversal of closed areas when not warranted and expanding other areas to offset any mitigation.

#### 2. PiSWERL Measurements

The PiSWERL measurements taken in 2013 could not determine the original source of the particulate matter being recorded. The results concluded that the "*Riding area is more emissive than the non-riding area*." However, more study is needed for the following reasons.

#### Surface Roughness:

A new study shows that surface roughness needs to be considered when performing PiSWERL measurements.

Accounting for surface roughness on measurements conducted with PI-SWERL: Evaluation of a subjective visual approach and a photogrammetric technique

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Department of Geography, Indiana University, Bloomington, IN

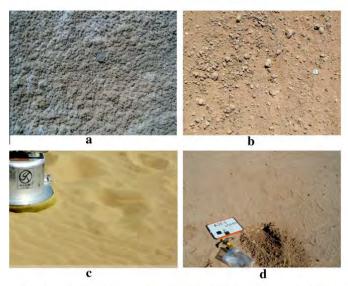


Fig. 8. Example surfaces encountered during field measurements. (a) Salt crusted playa (photo credit: Mark Sweeney); (b) Gravel covered loose soil (photo credit: Mark Sweeney); (c) Rippled dune surface (Photo credit: Vicken Etyemezian); and (d) Silt-crusted playa with cracks (Photo credit: Vicken Etyemezian).

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D. The surface shown in Fig. 8b more closely resembles LR1 and probably should be placed in category D. Fig. 8c depicts a rippled dune surface and can naturally be compared to Wave 2 or Wave 3 surfaces (borderline between Categories B and C). Categorization of Fig. 8d is less straightforward since none of the surfaces tested here resembles a cracked silt/clay crusted playa. However, here too, a researcher with reasonable experience with boundary layer properties would presume the surface is somewhat smooth (Category A or B).

<u>Please note</u>: Figure 8c is a typical sand dune surface, but is still confusing between Wave 2 or Wave 3 surfaces and even (borderline between Categories B and C). Calibration would therefore be required to compare the riding area (rougher surface) to the non-riding area and there is no real evidence that this was done back in 2013 since this report was published in 2018.

## 5. Practical applications and limitations of roughness correction

A useful application of the information gathered in this study is a more accurate relation of PI-SWERL RPM to equivalent  $u_{\star, \rm eff}$  using information about the surface roughness. To date, investigators have had to rely on the calibration of PI-SWERL RPM over a smooth surface (Etyemezian et al., 2007). Recognizing that this led to a source of error for their data, Sweeney et al. (2008) applied a single correction factor – estimated roughly by invoking similarities between the PI-SWERL flow regime and Couette flow – for the surfaces that were among the roughest they tested. A more systematic approach for applying a rough surface correction has not been available to date.

It can be seen from Fig. 6b that the error in using the smooth surface calibration regardless of surface roughness can lead to substantial underestimates of  $u_{*,eff}$ . Underestimating the  $u_{*}$  at which a measurement is being conducted has the effect of ascribing much higher dust emissions to a rough surface than would actually be occurring at that (underestimated) value of  $u_{*}$ .

The most direct method for correcting for roughness would be to use a reproduction of the surface of interest in the same types of laboratory tests that were conducted in this study. Recently, it has become possible to use LiDAR technology to obtain highly detailed, three-dimensional representations of real surfaces with resolutions on the order of one millimeter or less (Aguilar et al., 2009). Therefore in principal, a surface of interest can be scanned by lidar in the field and the surface reconstructed using a three-dimensional printer – also increasingly available. The reproduced surface can then be tested directly in a viscometer-type device similar to

Based on this study, improper calibration for surface roughness "has the effect of ascribing much higher dust emissions to a rough surface than would actually be occuring"

roughness of the surface. A series of measurements using a device similar to a viscometer indicated that the effect of surface roughness on this relationship could be embodied in a single parameter  $\alpha$ , which ranged between a high value of unity for smooth surfaces and a low value of 0.85 for the roughest surfaces tested. The same measurement technique was used to investigate the effect of small variations in the distance between the PI-SWERL annular blade and the test surface. Such variations may be encountered in field set-

<u>Please note</u>: "parameter  $\alpha$ , which ranged between a high value of unity for smoth surfaces and a low value of 0.85 for the roughest surfaces tested."

DRI letter to State Parks dated July 9, 2014 states:

"For all the surfaces tested as part of this project, it was assumed that  $\alpha$  was equal to unity."

Which implies all surfaces tested are smooth surfaces...when the surfaces in the study area are not all equal nor smooth. The camping area (aka riding area) has debris from campsites (charcoal bits, wood chips and other debris) not normally found in other areas. In addition to tire tracks that criss cross and are not "normal sand ripples" in non-riding areas.

Source: https://draeolus.files.wordpress.com/2015/09/etyemezian\_2014\_ar\_1-s2-0-s1875963714000214-main.pdf

#### Concerns of Particulate Sources Upwind of the Camping and Riding Area:

The roughness of the riding area due to tire tracks, debris etc., can cause much greater surface roughness which allows:

- Wind erosion to occur that establishes opportunity for the saltation process.
- Tire tracks to trap upwind particulate matter.

We do not have enough information to make a determination of the camping and riding area. Just because the camping and riding area is more emissive it does not mean that the particulate matter did not blow over or on top of the sand from an upwind source or that the increased surface roughness from debris in not causing small points for increased erosion.

The "riding area" is downwind of the highly emissive ocean and beach. There is ample evidence to show that the aerodynamic forces of the wind blowing in and around the RVs is causing erosion under the RVs. This wind erosion can also occur around debris in the sand that allows blowing sand for the saltation process to occur. In addition, there is documented evidence of the marine material blowing in land and across the riding area.



Picture of typical wind erosion under RV at the Oceano Dunes (picture from 1970s)

#### **PiSWERL Conclusion:**

More study is needed to correctly determine the source of the particulates being measured by the PiSWERL measurements and whether the PiSWERL measurements were done correctly. The current rush to judgment based on a small sampling does not fully explain the source of the particulates being monitored downwind in the riding area.

Mitigation methods other than planting hundreds of acres need to be evaluated.

#### 3. Dust Inventory collected near the ODSVRA

Monitors at CDF and the MESA have been collecting particulate samples for well over a decade, yet we still have no dust inventory that clearly establishes where these particulates originate.

The SLO APCD website (<a href="https://www.slocleanair.org/library/emissions-inventory.php">https://www.slocleanair.org/library/emissions-inventory.php</a>) states the following.

## **Emissions Inventory**

The San Luis Obispo County Air Pollution Control District maintains an air pollution emissions inventory for the County with some data collected from the California Air Resources Board (ARB). The air pollutants tracked by this inventory are known as 'criteria pollutants'. Criteria pollutants include: Total Organic Gases (TOG) including its more reactive subset volatile organic gases (VOC), oxides of nitrogen (NOx), carbon monoxide (CO), oxides of sulfur (SOx) and particulate matter (PM). Sources of air pollution are grouped into the major categories of: stationary, mobile, area-wide and natural sources.

Stationary sources include fixed facilities such as: power plants, waste water treatment plants, auto body shops, and landfills. Most stationary sources are required to obtain a Permit to Operate from the District, and these facilities submit annual activity reports that are used to estimate their emissions. Emission estimation methods come from: actual emission testing, from the Environmental Protection Agency's AP-42 Compilation of Emission Factors, and other evaluations.

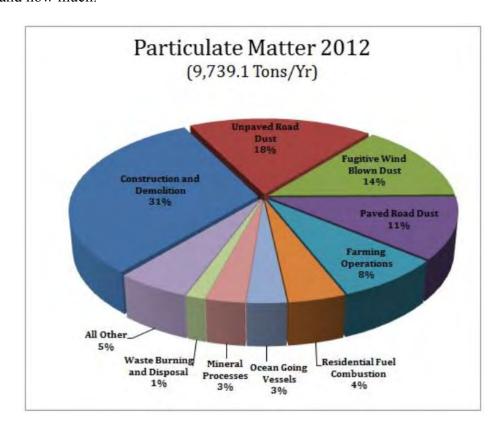
Examples of area sources are: residential water heating, consumer products, unpaved roads, and crop tilling. Area sources may be spread out throughout the county, and each of those point sources individually may not appear to be important, but the collective emissions from many of these categories are very significant. This illustrates how the individual choices that we all make are very important to our air quality. We would encourage consumers to select energy efficient home appliances, the use of low emitting paints, and solvents and other water

#### The APCD website further states:

#### PM

Particulate matter is comprised of various small particles. Of primary concern are particles that are 10 micrometers in diameter or smaller (PM10) and particles that are 2.5 micrometers in diameter or smaller PM (2.5). Particles that fall within that range can enter the lungs or blood and cause health problems. PM includes: mineral dust, acid droplets, organic chemicals, and metals. The PM data does not include a specific estimate of emissions from the Oceano Dunes State Vehicle Recreation Area; emission factors from that source are planned for development but are not currently available. Of note, CARB has recently updated their methodology for calculating fugitive road dust emissions which significantly lowered the PM emissions for this and all previous inventories. Previously posted inventories will need to be adjusted when comparing PM trends.

The APCD then provides the following stale data from 2012. The ODSVRA is not mentioned and is assumed to be in one of these percentages, but APCD has never stated where and how much.



Friends is concerned that the APCD, SAG and DPR do not have information distinguishing what particulates originated from the ODSVRA versus travel across the ODSVRA from outside sources. What percentage of the particles in the CDF and MESA monitors originate from the ODSVRA from natural emissions or outside polluters when compared with those caused by the use of the park for camping and OHV use? A particulate DNA needs to be performed to better understand where the particles are originating from.

The APCD, SAG and DPR must determine what percentage of the particulates being measured at the CDF and MESA monitors are:

- Originating from the ODSVRA
  - o Natural background emissions (not caused by camping and OHV)
  - O Particulates that originate from the ODSVRA due to effects from the state legislated camping and OHV use.
- Not originating from the ODSVRA, but originating elsewhere and traveling across the ODSVRA
  - o Particulates from the ocean
    - SCRIPS report on natural marine influence

- Particulate waste in the water from the Diablo Nuclear power plant out flow and the thermal plume deposited in front of the ODSVRA
- Other sources (dust from China as an example or elsewhere)
- Recirculated particulates that have been washed off streets, parking lots, roof tops and other locations that then get washed out to sea in the millions of gallons via the outflows in front of the ODSVRA
- Fine silt from the tributaries (Arroyo Grande Creek, Oso Flaco Creek, Santa Maria River)
- Particulates blown into the ODSVRA from adjacent sand sheets, then blown towards the CDF and MESA
- o Other outside sources
  - Dirt roads adjacent to monitors
  - Other roads and streets
  - Farming operations and agricultural fields
  - Industry in the local area, including oil, salvage yards, sand blasting and painting
  - Rail operations

The USEPA states the following (emphasis added) regarding emission inventories. (source: <a href="https://www.epa.gov/air-quality-management-process/managing-air-quality-emissions-inventories">https://www.epa.gov/air-quality-management-process/managing-air-quality-emissions-inventories</a>)

"Governments use emission inventories to help determine significant sources of air pollutants and to target regulatory actions. <u>Emissions inventories are an essential input to mathematical models that estimate air quality.</u> The effect on air quality of potential regulatory actions can be predicted by applying estimated emissions reductions to emissions inventory data in air quality models.

Emission trends over time can be established with periodic updates of the emissions inventory. Inventories also can be used to raise public awareness regarding sources of pollution.

An emissions inventory includes estimates of the emissions from various pollution sources in a geographical area. It should include all pollutants associated with the air quality problems in the area. For example, an emissions inventory to support the management of ground-level ozone should include sources of nitrogen oxides (NOx) and of volatile organic compounds (VOC)."

In conclusion, the APCD, SAG and DPR do not know to what extent the camping and OHV use (that has been legislated for use at the ODSVRA) contributes to the overall particulate emissions, but they are assuming nearly 100% which is in error and not fair. As the USEPA states "Emissions inventories are an essential input to mathematical models that estimate air quality."

#### **Dust Inventory Conclusion:**

So why is the APCD, SAG and DPR ignoring the vital asset of a dust inventory? It appears a rush to judgement has been made and it cannot continue!

#### 4. 1930s vegetation improperly used as the "gold standard"

DPR seeks to return the ODSVRA back to the vegetated levels of the 1930s in an attempt to mitigate the dust. But there is no scientific reason to choose the 1930s. The choice is arbitrary. Why not 1700, 1920, or 1940, or 1982 when the park was established?

In addition, there has been <u>no</u> study of whether the vegetation shown in the 1930s is natural vegetation or manmade or whether the vegetation is native on nonnative. Man has actively planted vegetation in an attempt to stop the sand migration during the many decades that the population developed around these open sand sheets. Much of the vegetation shown existing in the 1930s was planted by man, and was not naturally occurring. Yet, DPR assumes all vegetation is natural and all open sand sheets are caused by OHV and camping. But that is a false assumption that is not supported by any data.

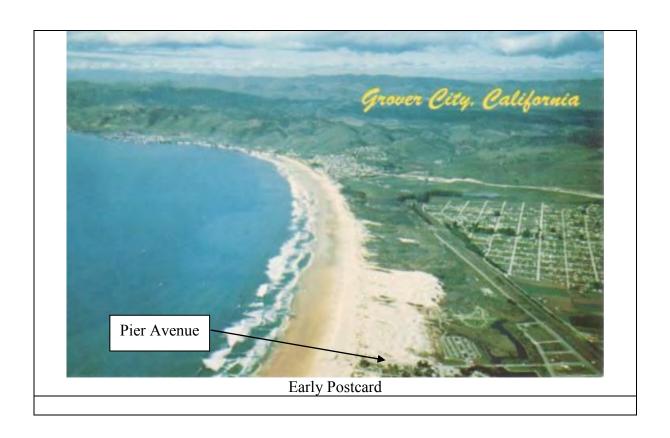
Further, DPR doesn't seek to remove surrounding vegetation in areas previously been shown by the same 1930s photos to lack vegetation. This pick and choose approach in deciding what vegetation needs to be planted or maintained is not balanced ... but rather wholly arbitrary, and indeed, <u>punitive to the public campers and OHV users for whom this park was established</u>.

It also is result-oriented, not science-driven. DPR has selected the 1930s as a standard but only follows that standard if it increases vegetation, not if it suggests vegetation should be removed. This one way approach is inconsistent with the legislative mandate to maximize this unique recreational opportunity and ensure the "fullest appropriate public use of the vehicular recreational opportunities present."

If DPR plans to return the ODSVRA back to the way it existed in the 1930s, then be fair about it and return ALL the acreage back to the way it was in the 1930s.

For example, the area to the North of Pier Avenue was clearly void of vegetation in the 1930s, but was planted by DPR...this area must be restored back to its 1930s vegetation level, i.e., no vegetation.





The area to the North of Pier Avenue was planted by DPR. This was documented in a 1970 Sunset Magazine article.

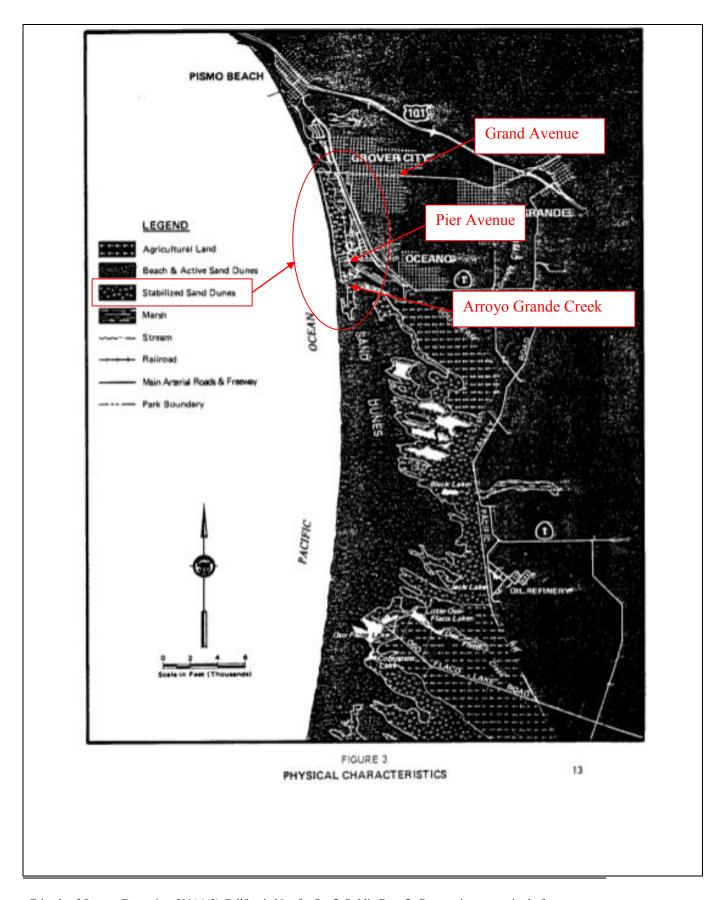




"Beach grass has been planted to anchor the dunes."

Also documented in the 1975 General Plan

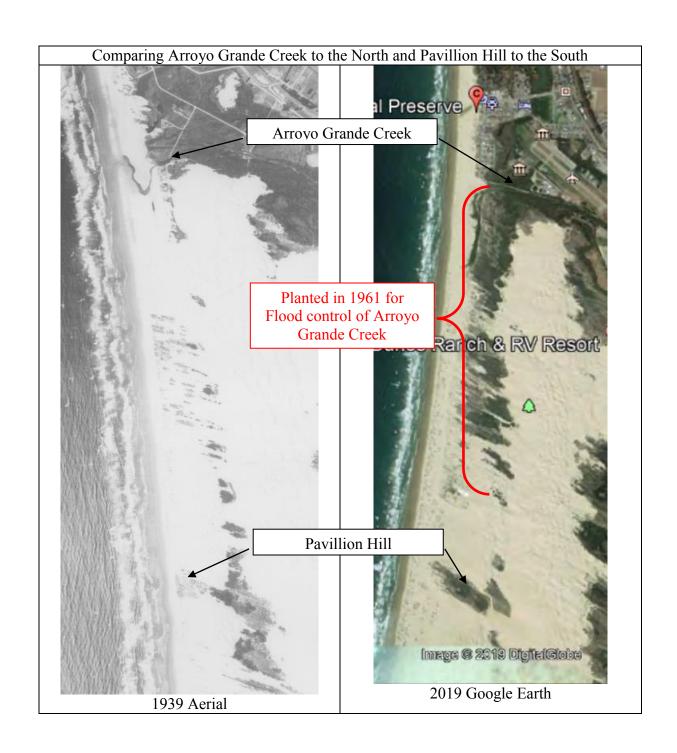
The low dunes north of Arroyo Grande Creek are not in their natural condition. They are occupied in many places by introduced plants and by developments of various types. It appears to be in the public interest to maintain these dunes in a condition controlled by vegetation.



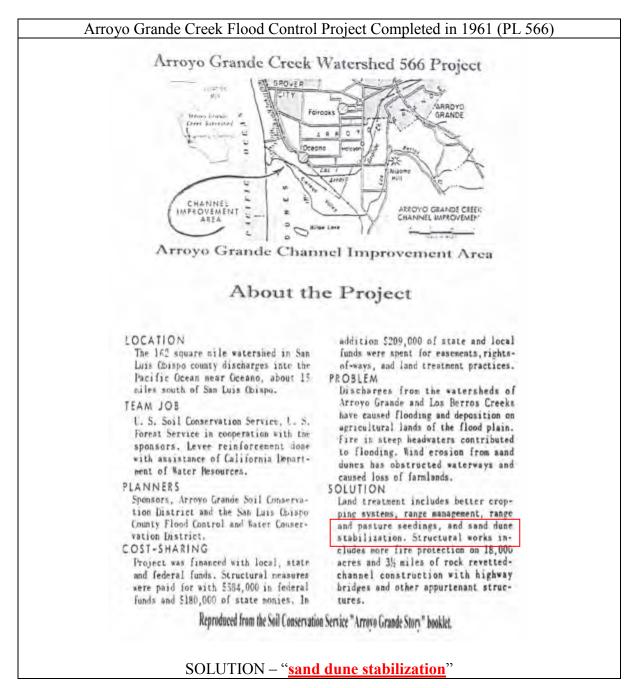
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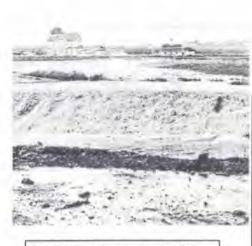
Pismo State Beach and Pismo Dunes State Vehicular Recreation Area

GENERAL DEVELOPMENT PLAN AND RESOURCE MANAGEMENT PLAN April 1975



The area immediately south of the Arroyo Grande Creek was planted by man to stabilize the dunes to protect the Arroyo Grande Creek.





Los Berros Creek storm overflow



Celebrating the completion of the AG PL 566 Project: Clark Moore, Keith Rapp, Lester Sullivan and Edwin Taylor.

Not pictured: Ed Campodonico, Manuel Silva and new AGSCD Directors J.O. Pence and George Dana.

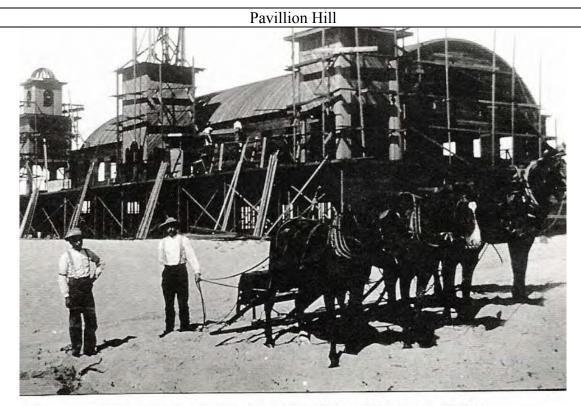
"Planting of beach grass to stabilize miles of sand dunes".

#### ARROYO GRANDE VALLEY FLOODING CONTROLS 1961

#### AG PL 566 Project Completed 1961

- A deepened and controlled stream bed
- for Arroyo Grande Creek,
- Diversion of Los Berros Creek into Arroyo Grande Creek. Control of Lopez Creek and Tar Creek.
- Tidal Gates in and working.
- Planting of beach grass to stabilize miles of sand dunes.
- Levees and water flowcontrols measures in and working.
- Land treatment-crop cover, range fertilization, and pasture and range seeding.
- Heliports, firebreaks, roads and fire protection in the upper watershed of the Los Padres National Forest.
- Awareness of the problem among the residents in the 161 square miles included in the watershed.

The Pavillion Hill was created by man and planted by man to stabilize the dunes.



Dance pavillion under construction at Pavillion Hill (circa 1900).



Dune stabilization — vegetation planting in front of Pavillion Hill (circa 1900).



Note: "White sand stretches away for twenty-one miles like a polished marble floor" It does not say vegetation had to be removed to enjoy the sand dunes.

The book, "The Duneites", was written by Norm Hammond and was published by the South County Historical Society in 1992. "The Duneites" gives considerable history for the dunes and surrounding area, while focusing on some early inhabitants of the dunes.

Page 12 of the Duneites reads: "Work began on a grand Pavillion at La Grande; the new Pavillion would be larger and more expensive than the one at Oceano. It would stand in the heart of La Grande Estates, on the highest dune in the five-mile stretch of sand between Oceano and Oso Flaco Lake. The Pavillion would face the ocean, just a few hundred yards from crashing surf."

Page 13 of the Duneites reads: "Succulent ice plant and European dune grass were planted in the huge dune at La Grande to stabilize the moving sand and prevent wind from cutting the foundations"

Page 13 of the Duneites reads: "The grand opening was scheduled for July 4, 1907. Local papers carried advertisements promoting a free barbecue, clambake, horse racing and dancing all day."

Page 14 of the Duneites reads: "The sea wind cut through the dune grass and iceplant. It cut a small notch next to the redwood foundation of the Pavillion and slowly widened until a man on horseback could ride beneath its northwest corner. The foundation weakened, and the northwest tower of the Pavillion began leaning over into the wind. It creaked and swayed for months, until the final grain of sand had been whisked away, letting the ornate tower collapse sadly in the night."

# INVASIVE SPECIES REPORT

Ammophila arenaria is in the Poaceae family. It is native to northern Europe and spread from plantings from the late 1800s to the late 1900s. Andrea Pickart has written that European beachgrass is the most pervasive exotic plant species currently threatening coastal dunes on the west coast of the U.S. and is invasive in every major dune system from Santa Barbara County to the northernmost dunes of Washington and has widely displaced a native dune grass, the circumboreal American dune grass (*Elymus mollis*).

In San Luis Obispo County, *Ammophila* arenaria was planted for sand stabilization and has spread throughout the Guadalupe-Nipomo Dunes and Morro Bay. It was planted to aid construction of the La Grande Dance Pavilion in the early 1900s south of Arroyo Grande Creek. It is a perennial grass 1 to 4 ft tall, with long, rigid, tough, waxy blades with sharp tips. European beachgrass spreads from rhizomes. Ammophila rhizomes may survive in the ocean and can be redeposited onshore to create new populations. Populations may extend inland to over half a mile.

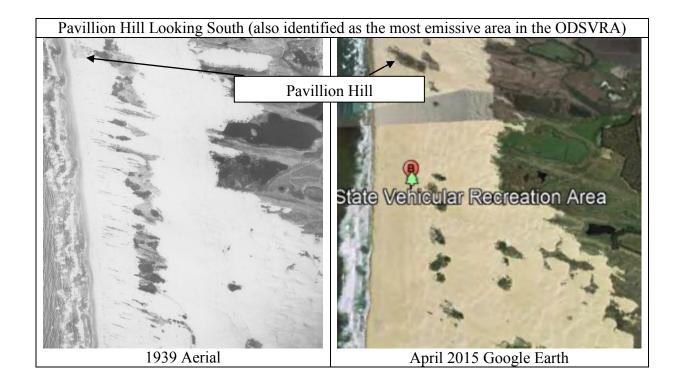




http://cnpsslo.org/topics/invasive-species/



Early 1970s picture at Sand Highway looking South showing Non-Native beach grass planted by man. Pavillion Hill would be right behind the person taking the picture.



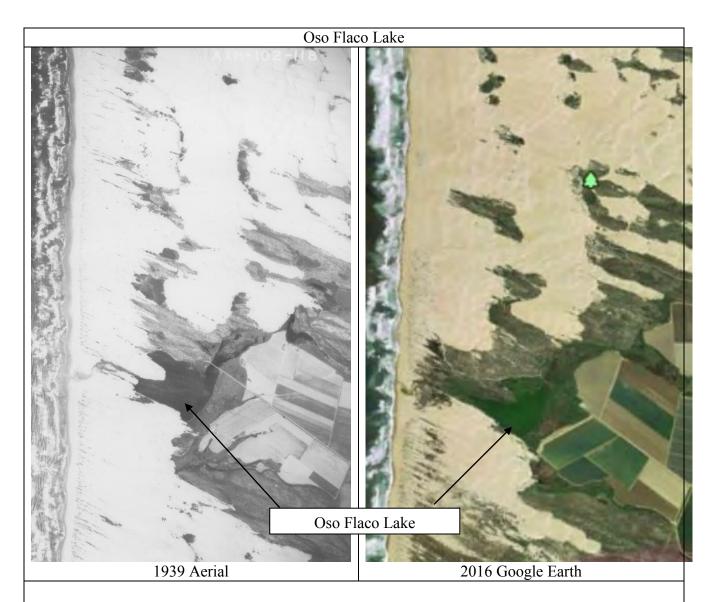
Pavillion Hill is man-made with non-native vegetation, yet it looks very similar to the other vegetation that is being claimed to be "natural" by DPR, APCD and the SAG.

The 1975 General Development Plan for the ODSVRA states the following: "Generally parallel to and 500 to 500 feet inland from the shoreline discontinuous fragments of stabilized Episode I dunes penetrate the active dune surface Traces of the older ridges at the coast foredune area can be matched with these Episode I dunes in the typical west northwest direction.

Various dune patterns are the result of (1) wind sand and water and (2) the previous elements and the <u>addition of vegetation</u>. One pattern of each of the above is found in the study area.

#### The addition of vegetation introduces irregularity and diversity to dune forms.

Soils. The dominant soil in the study area is coastal dune sand. The majority of the area is covered by actively drifting sand supplied by the ocean and blown inland by the wind **Substantial portions have been stabilized with vegetation**"



Please Note (emphasis added):

"In the past decade <u>more than 250 acres</u> of sand dunes in the Oceano Dunes SVRA, the <u>majority in</u> <u>the non-riding area around Oso Flaco</u>, have been successfully vegetated with native plant species."

Source: 2002 "Taking the High Road" published by DPR

#### 1930's Vegetation Conclusion:

Knowing that the <u>multiple areas have been vegetated by man to establish foredunes</u> as demonstrated above near Pier Avenue and Arroyo Grande Creek, or the establishment of the Pavillion Hill should provide enough concern as to whether other vegetation shown in the 1930s pictures is easily identified as "natural" with no additional proof.

#### 5. Vegetation restoration

The SAG stated on page 27 (emphasis added):

"The SAG also notes that the existing plover habitat situation in ODSVRA is somewhat artificial as destruction of the native foredune ecosystems has inadvertently created new habitat for these species that would not exist naturally."

"To meet the requirements of the SOA to reduce dust emissions from highly emissive surfaces, the SAG recommends a new area to be exclosed permanently for the benefit of **foredune restoration**."

Although the SAG thinks this area was solid foredunes, as shown in the previous section it was not.

Many uninformed are quick to think that all vegetation is normal and all areas not vegetated is due to OHV use...while some vegetation has been lost due to OHV impacts, much of the vegetation was not normal for these highly active dune sheets.

One must think about the history of the dunes going back 100s if not 1000s of years. If the dunes are to be naturally vegetated, why were they not vegetated before man settled in this area?

Why did Don Gaspar de Portola in 1769 traveled up the coast and after crossing the Santa Maria River they shot and killed a small bear "un oso flaco" which is where the Oso Flaco Lake gets its name.

The Pismo Beach region has an interesting history going back in time to 1769, when Don Gaspar de Portola and parties camped in the area.

According to the diary of Costanso, a member of the Portola party, "the party continued over the sand dunes (from Oso Flaco Lake) and then descended to the beach, along which they walked for several miles before camping for the night. Near their camping place was an Indian village of some forty people." Undoubtedly the beach walked upon by the Portola party was that known today as Pismo State Beach.

Source: 1975 State Parks General Plan

#### **Vegetation Restoration Conclusion:**

If the dunes are supposed to be naturally vegetated, surely they would have been fully vegetated by 1769...but as you can see from the diary of the Portola party, they were not easily passable sand dunes. Any discussion about "restoring vegetation" or implying "vegetation was destroyed" needs to be evaluated for truthfulness instead of wishful thinking.

#### 6. Deflation plane and wind erosion

DPR, SAG and APCD have not explained how adding more vegetation and foredunes will not cause excessive problems by creating a deflation plane.

Deflation planes are created by the wind effect going over the foredune and then eroding the sand on the downwind side. This erosion can be seen at the manmade "7.5 Reveg Island" where massive amounts of sand have been eroded on the eastern side (downwind) of the vegetated island. This erosion sent a lot of sand east towards the Mesa.



#### "Deflation plains"

The foredune separates the beach from inland areas. Winds strip away the sand east of the

<sup>&</sup>lt;sup>1</sup> Foredunes generally reach from the mean high tide on the sandy beach to the upper reach of storm waves. Northern foredunes occur along the coast where sandy beaches are present and rocky headlands are absent and may form a low ridge running parallel to the shoreline. Known occurrences are Cresent City, Fort Bragg, Point Arena, Bodega Bay, Dillon Beach, Point Reyes, San Francisco, Monterey Bay, Morro Bay and Nipomo Dunes (Holland 1986). Northern foredunes are characterized by open shifting sands with plant cover usually occupying less than 10 percent of the area (Barbour and Johnson 1988). Shorebirds commonly use beach and

Friends of Oceano Dunes is a 501(c)(3) California Not-for-Profit Public Benefit Corporation, comprised of over 28,000 supporters. We represent environmentalists, equestrians, campers, fishermen, families and off-road enthusiasts who enjoy the benefits of Public Access through Responsible Recreation at the Oceano Dunes State Vehicular Recreation Area (ODSVRA). We want to maintain Access For All!

foredune, deflating the area down to the permanently wet sand. This creates a deflation plain where water-loving vegetation thrives. As the dunes move eastward, the plants of the deflation plain also spread eastward."

https://www.fs.usda.gov/detailfull/siuslaw/learning/nature-science/?cid=fsbdev7 007155

Deflation planes can also create small standing water pools which can also attract predators which can cause serious harm to the visitors to the beach and the threatened and endangered shorebirds.

#### **Deflation Plane Conclusion**:

**DPR, SAG and APCD need to explain the secondary effects caused by planting vegetation and how those effects may be mitigated**. This is required by the Coastal Act.
See Pub. Res. Code section 30253 ("New development shall do all of the following: (a)
Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (b)
Assure stability and structural integrity, and **neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area**...")

#### 7. SAG language to allow non-native vegetation

The SAG make statements without any supporting evidence, such as on page 31 (emphasis added):

"The SAG notes that the <u>sea rocket is not a native species</u>, but it has been thoroughly naturalized in this area, and performs a valuable ecological role in the establishment of incipient dunes. It is very common in foredunes of the Central Coast, <u>and is not considered to be either invasive or a threat to any local habitats</u>."

The SAG asserts definitive proclamations with no proof or supporting evidence. This is very disappointing.

#### The SAG then continues to state:

"Language in the Coastal Permit that specifies that only native plants found at Oceano and its vicinity should be used should be clarified to include "naturalized plants that are non-invasive" and that "vicinity" should be broadly interpreted to be "regional"".

foredune areas for foraging. In particular, foredunes provide foraging and nesting habitat for the threatened western snowy plover along the Pacific Coast from Washington to the southern Baja Peninsula. Snowy plovers forage for invertebrates in beach sand, kelp wrack and within foredune vegetation. Nesting sites for these birds often occur in similar sandy beach and foredune areas above the high tide line (USFWS 2007).

#### References

Alpert, P. 2016. Coastal dunes. pp. 409-427 in Mooney, H. and Zavaleta, E. (eds). Ecosystems of California. University of California Press, Berkeley, California.

Seems odd that the SAG is suggesting making changes to allow "broadly interpreted language" when it supports closing and vegetating, but does not show any similar interpretation towards protecting the state legislated camping and OHV recreation. This is very one-sided.

#### **SAG Language on Non-Native Vegetation Conclusion:**

The SAG makes numerous suggestions to shortcut the system in order to allow more planting of vegetation. These deviations and suggestions are very disturbing and raise numerous procedural and ethical dilemmas.

#### 8. Results from vegetation versus meteorological effects?

The APCD stated on page 1 (emphasis added):

"The District believes that compliance is possible and that is <u>supported by last year's</u> measured PM10 reductions which greatly exceeded expected reductions from the fencing that occurred."

However the APCD cannot discern if the "PM10 reductions" are due to wind changes (speed, velocity, percentage in one direction) or increased rainfall contributions.

As discussed previously, the area has experienced unprecedented drought conditions followed by excessive rain.

## Rainfall totals thru late Thursday night



Atascadero by Patti Santoianni

Remember this system is a two day system.. so these new records are just for the 24 hour period today

A RECORD RAINFALL OF 0.71 INCH(ES) WAS SET AT SANTA MARIA AIRPORT CA TODAY. THIS BREAKS THE OLD RECORD OF 0.55 SET IN 1906.

Source: https://ksby.com/news/2018/11/29/59600

#### **Meteorological Conclusion:**

Record rainfall in the area is likely reducing ODSVRA dust emissions and to date no modeling or analysis has been performed to show the cumulative meteorological effect.

#### 9. DPR, APCD & SAG scope and focus

DPR stated in the DPMRP on page 2-8:

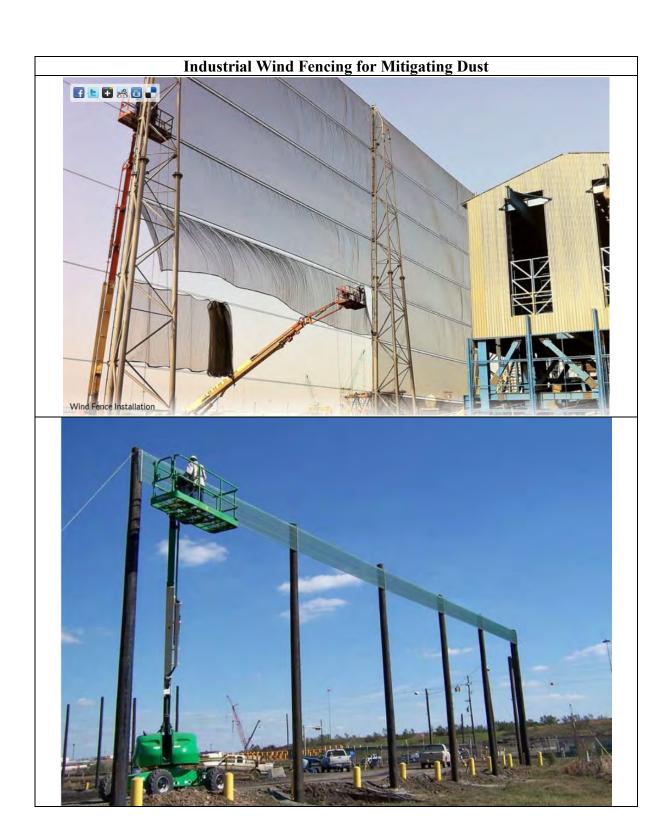
"Continued funding through the OHV Trust Fund for PMRP implementation is contingent upon the PMRP allowing for the continued operation of a beach camping and OHV recreation area pursuant to the OHMVR Act."

The OHMVR Act directs DPR to protect and expand camping and OHV recreation wherever possible.

Mitigation for agriculture land does not require the Ag land to be reduced by 30% or 50% and planted to reduce dust emissions, but allows for mitigation to take place on the exterior perimeters.

Similarly, freeway and road impacts are mitigated by adding perimeter fencing, not closing and planting the freeway.

DPR, SAG and APCD need to look at all mitigations, especially those that support continued use of the ODSVRA.



#### **DPR, APCD & SAG Scope Conclusion:**

Loss of riding and camping area could be minimized by installing high, industrial-type wind fencing in critical areas. This wind fencing can be up to 50 feet tall and span great distances which would reduce the total vegetation acreage needed.

#### 10. Disclosure statements for Nipomo Mesa

The residents on the Nipomo Mesa are very good at playing the "victim card" regarding any dust issues on the Mesa, but fail to recognize the primary person responsible for putting them in the dusty environment...**themselves**.

The following highlights that the developer informed all buyers of the dust on the Mesa, and residents have even stated that it was well documented when they purchased their homes.



3/21/18 – Shea Home Developer for Monarch Dunes Community, Andrew Deamude stated:

"we obviously, due to California law and so forth have to do all those <u>disclosures to every</u> person that buys a home that it is dusty on the Mesa"



2/7/18 – Mesa resident Joyce Southward stated:

"I live on the Nipomo Mesa in Cypress Ridge where I moved from the San Francisco Bay Area in April of 2016 and was shocked to discover the air pollution on the Mesa which was clearly identified in documents when I purchased my house"

The disclosure statements below are very clear and it is a shame that the residents of the Nipomo Mesa cannot take ownership for their investment choices.

51. Nipomo Mesa Airborne Particulate Matter. According to the San Luis Obispo County Air Pollution Control District (the "SLO APCD"), historic ambient air monitoring has shown that particulate concentrations on the Nipomo Mesa, an area of the County in which the Community is located, are significantly higher than other areas of the County and that the California health standard for PM10 (airborne particles with a mean aerodynamic diameter of 10 microns or less) is regularly exceeded in many locations on the Nipomo Mesa. According to a study by the SLO APCD titled "South County Phase 2 Particulate Study," dated February 2010 (the "APCD Report"), the airborne particulate matter on the Nipomo Mesa predominantly consists of fine sand material transported by high winds from coastal dune areas. The APCD Report suggests that off-road vehicle activity at the Oceano Dunes State Recreational Vehicle Area is a major contributing factor to the high PM10 levels.

An earlier study by the SLO APCD, titled "Nipomo Mesa Particulate Study 2007," advised that all fine airborne particulate matter, regardless of compositions, can cause respiratory distress when inhaled, especially to the very young, the elderly and those with compromised respiratory systems. Sand particles are high in crystalline silica and the International Agency for Research on Cancer (the "LARC"), a division of the World Health Organization, has classified inhaled crystalline silica from occupational sources as carcinogenic to humans. The IARC conclusions were based on occupational exposure and Seller is not aware of any quantitative risk assessment for low exposure (i.e. non-occupational exposure) to inhaled crystalline silica.

In September 2011 the SLO APCD approved a short-term air monitoring project to better understand the distribution and community impacts of the particulate emissions plume originating from Oceano Dunes. The project involves, among other actions, the placement of numerous air monitors throughout the Nipomo Mesa area. The monitors are intended to sample the air for particulate matter during March, April and May, the windiest time of the year. A report on the findings of the monitoring project were expected to be released in Fall 2012.

Seller is not qualified and has not undertaken to evaluate all aspects of this issue and makes no representation, express or implied, concerning the presence, absence or level of risk associated with PM10 and/or crystalline silica. Seller does not render an opinion or endorse any studies or findings regarding this issue, including the studies and findings cited above. For further information about PM10 in the Nipomo Mesa area or to obtain copies of the studies referenced above, Buyers should contact the San Luis Obispo County Air Pollution Control District, 3433 Roberto Court, San Luis Obispo, CA 93401, (805) 781-5912, info@slocleanair.org. The APCD currently Report is also available line http://www.slocleanair.org/pdf/PM2-final report.pdf.

487/021282-0009 19 of 42

Seller discloses to Buyer that PM10 and/or other particulates in and around the Community including, but not limited to, crystalline silica, may create health risks and may adversely affect the marketability, appreciation, value, insuring and financing of Buyer's Homesite. Buyer must investigate this matter to Buyer's satisfaction before purchasing a Homesite in the Community.

By signing this Disclosure Statement and/or by accepting a deed to a Homesite, Buyer acknowledges that (a) Buyer has reviewed the particular sections of this Disclosure Statement regarding PM10; (b) Seller is not responsible for and has no control over PM10 or its impacts, if any, on Buyer and Buyer's family, guests, invitees, tenants, agents or employees; and, (c) Buyer waives and releases Seller from any loss, damage, expenses, liability, claim or obligation of any kind arising out of or in any way related to exposure to PM10 or crystalline silica.

In conclusion, the <u>Mesa Residents were clearly warned</u> about dust issues on the Mesa, and <u>they signed these disclosure statements fully knowing about the dust</u> and any issues the dust might cause.

#### Final Conclusion:

Friends strongly objects using OHV dollars to close 500 or more acres for unproven dust mitigation based on a model using flawed data (2013 data) that is not representative and has not been verified and validated. DPR must demand that the model include meteorological data, be representative, verified and validated prior to the loss of anymore camping and recreation area. Friends insists on a "No Net Loss" approach—
If DPR takes an acre, then DPR should open an acre to ensure a guaranteed amount of acreage for the continued legislated camping and OHV use at the ODSVRA.

There will be substantial impacts if DPR decides to close the ODSVRA:

- SLO county would need to pay for any mitigation of the La Grande Tract for dust mitigation
- Loss of ~\$250M economic benefit to the surrounding Five Cities Area
- Immediate reduction of jobs via business closure (estimated at 3,300 jobs lost)
- If no OHV use, then no OHV dollars should be spent on:
  - o endangered species protection, which would cause significant impact to western snowy plovers and California least terns
  - o no in lieu funds provided to SLO county

#### At some point:

- <u>SLO county and APCD must take responsibility</u> for allowing a housing development project downwind of the ODSVRA when they knew there was dust blowing across the dunes.
- Residents need to own their decision to buy and live in property down wind of the ODSVRA. The residents were warned of dust issues before they purchased.
- <u>DPR must protect the use of this legislatively authorized park</u> that they were entrusted to manage.
- The users of the park have bent over backwards for endangered species protection and dust mitigation...but <u>our generosity and being a good neighbor must end</u> unless mitigation measures are more reasonable.

Sincerely,

Jim Suty

President – Friends of Oceano Dunes

CC: Tom Roth, Esq. FRIENDS Board of Directors

Cc: mlee@co.slo.ca.us; lvanfleet@co.slo.ca.us

Subject: Fw: Request Information on Buffer Map.

Date: Thursday, March 08, 2007 11:20:22 AM

Attachments: MJanssen letter 022507.pdf

Jim:

Below are our brief responses to your questions. Thanks for your patience.

Matt

- we, the Planning and Building Department are the author of Figure 4,
- circa 1978-79
- the purpose was to delineate an area of buffer between the sensitive habitats north and east of the riding area on county-owned land, while recognizing the sand highway entrance passes through this area into the active riding area and assumed buffers from the surrounding sensitive areas (nature preserve to the north and the lakes on private property to the east).
- the map was created prior to the 1980 adoption of the LUO/LUE, the 1984 approval of the coastal Land Use Plan, and the 1988 certification of the LCP, and the issue of uses within the buffer were never prohibited based upon the map as a buffer.
- Figure 4 is not necessarily in "error"...it is just inconsistent with the evolution of the permits issued by the Coastal Commission that are cross referenced in the language in the LCP and the areas of usage that have historically been allowed under these permits. The map should have been corrected long ago to more closely reflect the actions taken by the Coastal Commission; however since the permit was still evolving the county did not carry forward such an amendment.

```
Jim Suty
<jimsuty@earthlin
k.net> To
mjanssen@co.slo.ca.us
02/25/2007 01:12 cc
PM
Subject
Request Information on Buffer Map.
Please respond to
Jim Suty
<jimsuty@earthlin
k.net>
```

Mr. Janssen,

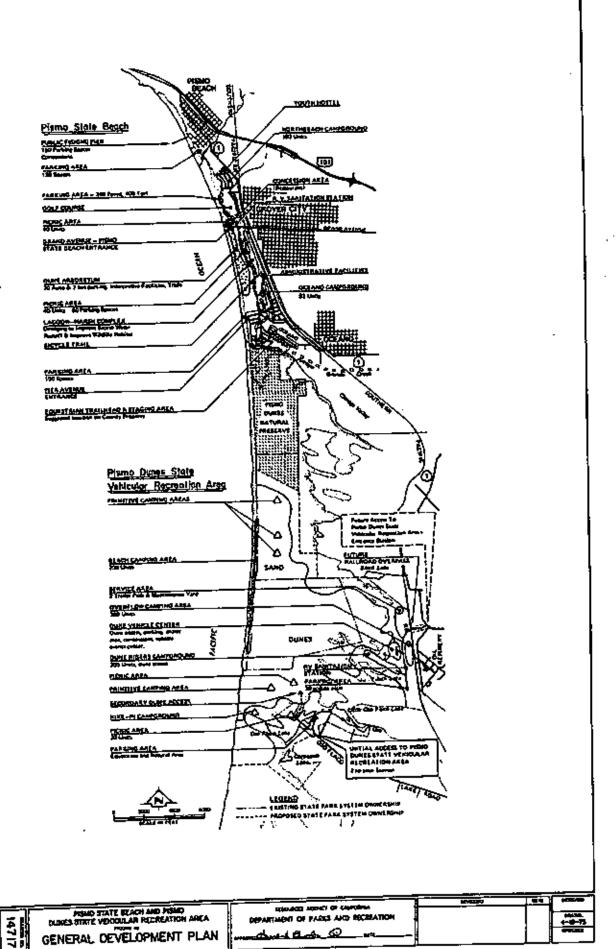
Please use the attached letter as a request to get more information on the now famous "buffer map" for the La Grande Tract land acquisition which is

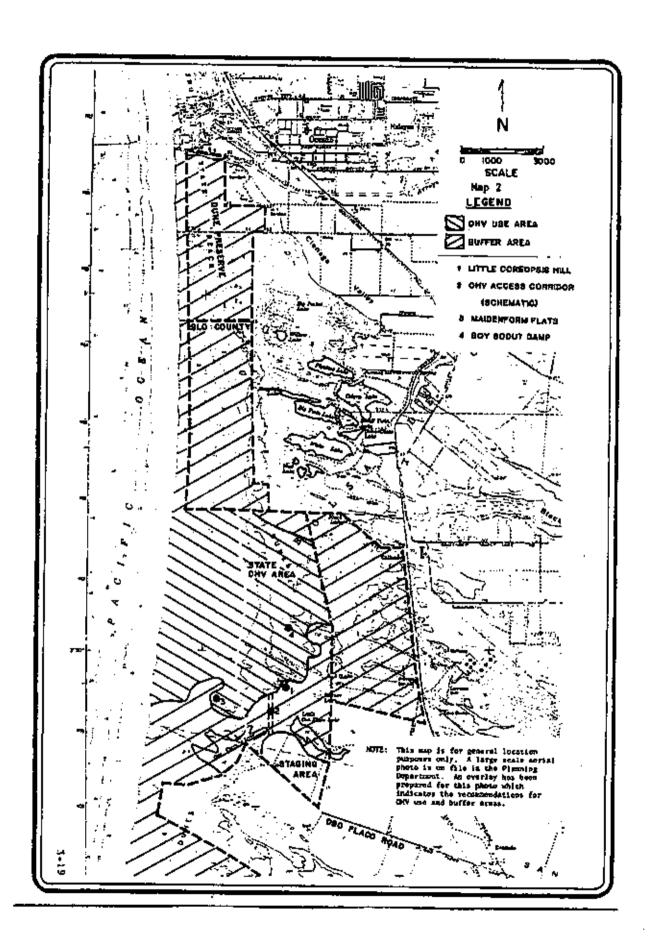
now being appealed.

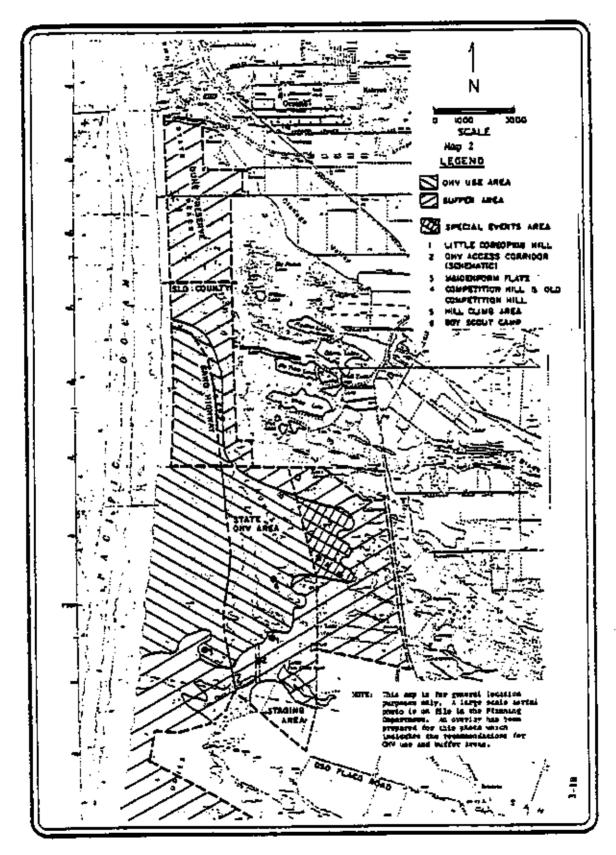
We know you are very busy, but would appreciate your efforts in getting a timely response to assist us in meeting the required deadline for providing our necessary background information for our appeal.

Thank you.

Jim Suty Cell 408-242-4445(See attached file: MJanssen\_letter\_022507.pdf)



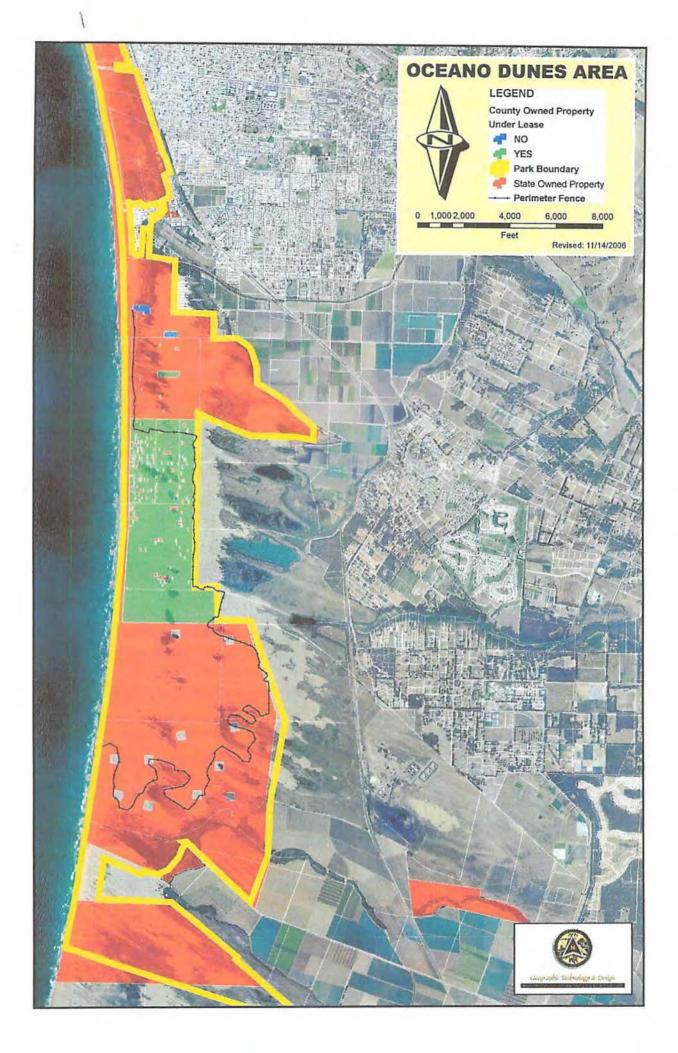




Planning Commission Recommendations (July 23, 1981)

# **ODSVRA** Oceano Markers CXT **Marker Post** Park Entrance Sand Hwy Marker Vegetation Islands Perimeter Fence 800 1600 Yards 0 0.5 0 MOYMELL WORMVALLEY PAVILLION HILL BBOFLATS BBGFLATS SO ACACIA HEATHER COTTONWOOD UCALYPTUS NORTH EUCALYPTUS TREE INDIAN MIDDEN SOUTH EUCALYPTUS SOUTH BOYSCOUT NORTH TABLETOP 7.5 REVEG PIPELINE

Miles





## Oceano Dunes SVRA Dust Control Program

## FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

State Clearinghouse # 2012121008

March 2017



### Oceano Dunes SVRA Dust Control Program

## FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

State Clearinghouse # 2012121008

March 2017

#### Prepared for:

State of California, Department of Parks and Recreation Off-Highway Motor Vehicle Recreation (OHMVR) Division 1725 23rd Street, Suite 200 Sacramento, CA 95816 (916) 324-4442 www.ohv.parks.ca.gov

#### Prepared by:

MIG | TRA Environmental Sciences, Inc. 2635 North First Street, Suite 149 San Jose, CA 95134 (650) 327-0429 www.traenviro.com | www.migcom.com



# OCEANO DUNES SVRA DUST CONTROL PROGRAM FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

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#### LIST OF ACRONYMS, ABBREVIATIONS, AND SYMBOLS

Acronym / Symbol	Full Phrase or Description
AB	Assembly Bill
ALUC	Airport Land Use Commission
ALUP	Airport Land Use Plan
APCO	Air Pollution Control Officer
CARB	California Air Resources Board
CCC	California Coastal Commission
CCR	California Code of Regulations
CDFG	California Department of Fish and Game (now CDFW)
CDFW <sup>1</sup>	California Department of Fish and Wildlife (formerly CDFG)
CDP	Coastal Development Permit
CDPR	California Department of Parks and Recreation
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CNDDB	California Natural Diversity Database
CNPPA	California Native Plant Protection Act
CNPS	California Native Plant Society
CRPR	California Rare Plant Ranking
CWA	Clean Water Act
dB	Decibel
EIR	Environmental Impact Report
ESHA	Environmentally Sensitive Habitat Area
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
GIS	Geographic Information System
НСР	Habitat Conservation Plan
HMS	Habitat Monitoring System
IS	Initial Study
LCP	Local Coastal Program/Plan
MBTA	Migratory Bird Treaty Act
m <sup>3</sup>	Cubic Meters
NAHC	Native American Heritage Commission
NCTC	Northern Chumash Tribal Council
NOP	Notice of Preparation

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<sup>&</sup>lt;sup>1</sup> Both CDFW and CDFG refer to the same agency.

#### LIST OF ACRONYMS, ABBREVIATIONS, AND SYMBOLS

Acronym / Symbol	Full Phrase or Description
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRP	Nipomo Regional Park
OHMVR	Off-Highway Motor Vehicle Recreation Division
OHV	Off-Highway Vehicle
PI-SWERL®	Portable In-Situ Wind Erosion Laboratory
PM	Particulate Matter
PMRP	Particulate Matter Reduction Plan
PM2.5	Fine Particulate Matter
PM10	Coarse Particulate Matter
PRC	Public Resources Code
PRE	Porous Roughness Element
SCH	State Clearinghouse
SLO	San Luis Obispo
SLOAPCD	San Luis Obispo County Air Pollution Control District
SPR	Standard and/or Specific Project Requirement
SPRP	Spill Prevention and Response Plan
SR	State Route
SVRA	State Vehicular Recreation Area
SWPPP	Storm Water Pollution Prevention Plan
US	United States
USACE	United States Army Corps of Engineers
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
WHPP	Wildlife Habitat Protection Plan
μg	Micrograms

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#### CHAPTER 1 INTRODUCTION

This document is the Final Program Environmental Impact Report (EIR) for the California Department of Parks and Recreation (CDPR), Off-Highway Motor Vehicle Recreation (OHMVR) Division's Oceano Dunes State Vehicular Recreation Area (SVRA) Dust Control Program (proposed Dust Control Program or proposed Program). Oceano Dunes SVRA is located in southwestern San Luis Obispo (SLO) County, approximately twelve miles south of the City of SLO, within the Coastal Zone established by the California Coastal Act. The SVRA borders and is contiguous with parts of Pismo State Beach. The Oceano Dunes District manages and oversees operation of both parks, which provide public access to beaches and coastal recreation opportunities, including off-highway vehicle (OHV) recreation in certain designated areas. In general, the OHMVR Division's proposed Dust Control Program would involve:

- Planting approximately 20 acres of native vegetation per year at Oceano Dunes SVRA. The OHMVR Division would plant this vegetation during the fall, when rains support the establishment of native dune vegetation. In total, the OHMVR Division could plant approximately 100 acres of native vegetation over the five-year period covered by this EIR.
- Deploying approximately 40 acres of seasonal dust control measures from approximately March to September at Oceano Dunes SVRA. The OHMVR Division would deploy dust control measures such as wind fencing, straw bales, porous roughness elements (PREs), and, potentially, non-toxic, environmentally friendly soil stabilizers to control and minimize dust on a seasonal basis. These seasonal measures could be installed as early as March 1 and removed as late as September 30. Seasonal dust control measures could also include pilot and/or demonstration projects as new control measures are identified by the OHMVR Division for implementation at Oceano Dunes SVRA.
- Potentially planting trees downwind of Oceano Dunes SVRA. The OHMVR
  Division may plant native, fast growing trees on private lands located downwind of
  the SVRA. Tree plantings would be unlikely to control or minimize dust emissions
  during the five-year period covered by this EIR, but could provide for the long-term
  control of dust emissions.
- **Dust and meteorological monitoring at Oceano Dunes SVRA.** The OHMVR Division would install, maintain, and operate scientific monitoring equipment to investigate and evaluate dust levels and control measure effectiveness.
- Preventing track-out of sand onto Grand Avenue in the City of Grover Beach and Pier Avenue in Oceano. The OHMVR Division would install, operate, and maintain grooved concrete at Pismo State Beach exits on Grand Avenue in the City of Grover Beach and Pier Avenue in the community of Oceano.

In addition to these activities, the proposed Dust Control Program would continue certain ongoing sand management, street sweeping, and track-out prevention activities currently taking place at Pismo State Beach and Oceano Dunes SVRA, such as the installation of wind fencing upwind of Pier Avenue, Grand Avenue, and Strand Way. These activities would not change as a result of the proposed Program and thus their continuation would not result in any new, physical environmental effects at either Pismo State Beach or Oceano Dunes SVRA.

Page 1-2 Introduction

Per California Environmental Quality Act (CEQA) Guidelines section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the draft
- Comments and recommendations on the Draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process
- Any other information added by the Lead Agency

#### 1.1 Environmental Review Process

The OHMVR Division determined the implementation of the proposed Dust Control Program would have the potential to have a significant impact on the environment and that an EIR would be prepared pursuant to CEQA. Accordingly, the OHMVR Division issued a Revised Notice of Preparation (NOP) and Public Scoping Meeting for an EIR for the proposed Program on February 6, 2015<sup>2</sup>.

The Revised NOP described the proposed Dust Control Program, its location, and probable environmental effects. The OHMVR Division distributed the Revised NOP to state agencies via the State Clearinghouse (SCH #2012121008) and directly distributed the Revised NOP (by either regular or electronic mail) to: the California Coastal Commission (CCC), California Department of Fish and Wildlife (CDFW), potential local responsible agencies such as SLO County, other interested agencies such as the U.S. Fish and Wildlife Service (USFWS) and the San Luis Obispo County Air Pollution Control District (SLOAPCD), Native American tribal representatives, and more than 50 other potentially interested organizations and individual members of the public. The OHMVR Division also posted the Revised NOP for review at the SLO County Clerk's Office, as well as adjacent county clerk's offices (e.g., Monterey County, Kern County, Santa Barbara County). A copy of the Revised NOP was also published in the SLO Tribune and Santa Maria Times and made available electronically via a weblink on the OHMVR Division's website. The OHMVR Division provided a public review period for the Revised NOP from February 6, 2015 to March 9, 2015. The OHMVR Division also held a public scoping meeting for the EIR on February 17, 2015. The OHMVR Division received written comments in response to the NOP from two state agencies, one local agency, and other interested organizations and members of the public. These comments were summarized in Draft Program EIR Section 3.2 and are presented in full in the Draft Program EIR Appendix A. The state and local agencies commenting on the NOP included the CCC, CDFW, and the SLOAPCD. The OHMVR Division received oral comments during the scoping meeting from interested members of the public. These comments are summarized in Section 3.2.2 of the Draft Program EIR. The OHMVR Division did not receive written comments at the EIR scoping meeting.

The preparation of the Draft Program EIR involved addressing comments received on the Revised NOP, reviewing the proposed Program's components and activities, conducting research

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<sup>&</sup>lt;sup>2</sup> The OHMVR Division had previously circulated an NOP and Initial Study for a Dust Control Program EIR for public review in December 2012. Subsequent to the release of the 2012 NOP, the OHMVR Division substantially revised the Dust Control Program area and activities and reduced the duration of the Program covered by the EIR. Accordingly, the OHMVR Division issued a Revised NOP in February 2015 so that agencies and the public could have the opportunity to provide meaningful comments on the currently proposed Dust Control Program.

Introduction Page 1-3

into the setting and potential impacts of the proposed Program, and evaluating potentially significant impacts pursuant to CEQA. The Draft Program EIR included an analysis of cumulative impacts and alternatives that could reasonably achieve most of the objectives set for the proposed Program and avoid or substantially lessen the significant environmental impacts associated with the Program.

The OHMVR Division issued a Notice of Completion (NOC) and a Notice of Availability (NOA) for the Draft Program EIR on August 1, 2016. The OHMVR Division distributed the NOC, NOA, and Draft Program EIR (on compact disc) to state agencies via the State Clearinghouse. The OHMVR Division directly distributed (by either regular or electronic mail) the NOA and/or the Draft Program EIR to the CCC, CDFW, potential local responsible agencies such as SLO County, interested agencies such as USFWS and the SLOAPCD, Native American tribal representatives, and more than 50 other interested organizations and members of the public. The OHMVR Division also posted the NOA for review at the SLO County Clerk's Office, as well as adjacent county clerk's offices (e.g., Monterey County, Kern County, Santa Barbara County), and published the NOA in the SLO Tribune and Santa Maria Times. Finally, the OHMVR Division made available electronic and hardcopies of the NOA and Draft Program EIR. Electronic copies were provided via a weblink on the OHMVR Division's website (<a href="http://ohv.parks.ca.gov/ohv-ceqa-notices">http://ohv.parks.ca.gov/ohv-ceqa-notices</a>), and hardcopies were made available for review at the Oceano Dunes District Office in Pismo Beach and the Oceano Dunes SVRA Ranger Station in Oceano.

The OHMVR Division initially provided a 45-day review period for the Draft Program EIR that was scheduled to run from August 2, 2016 to September 16, 2016. During this time period, the OHMVR Division received a request for an extended public review period for the Draft Program EIR from an interested organization. On August 30, 2016, the OHMVR Division issued a Notice of Extended Public Review that announced comment period for the Draft Program EIR, which was set to expire Friday, September 16, 2016, had been extended by 17 days to Monday, October 3, 2016, to allow the agencies and the public additional time to submit comments on the Draft Program EIR. The OHMVR Division distributed the Notice of Extended Public Review for the Draft Program EIR to the same agencies, organizations, and interested members of the public that received the NOA for the Draft Program EIR. The OHMVR Division directly distributed the Notice of Extended Public Review was not published in the SLO Tribune or the Santa Maria Times. Thus, in total, the OHMVR Division provided a 62-day public review period for the Draft Program EIR. The OHMVR Division also held an information meeting to discuss the contents of the Draft Program EIR on August 23, 2016.

The OHMVR Division received 23 written comment letters generally pertaining to the contents of the Draft Program EIR, including letters from three state agencies (CCC, CDFW, State Clearinghouse), one local agency (SLOAPCD), and other interested organizations and members of the public. The OHMVR Division also received oral comments at the EIR information meeting held in August 2016. Upon completion of the public review period, written responses to all significant comments raised with respect to the environment were prepared and incorporated into the Final Program EIR. Written responses to comments received from any public agency have been made available to those agencies at least 10 days before the OHMVR Division considers certification of the Final Program EIR. All comments and their responses will be considered by the OHMVR Division when deciding on whether or not certify the Final Program EIR and approve the proposed Dust Control Program.

Page 1-4 Introduction

#### 1.2 CHANGES TO DRAFT PROGRAM EIR

CEQA anticipates that the public review process will elicit information that can result in modification of the project design and refined impact analysis to reduce potential environmental effects of the project. As provided in CEQA Guidelines section 15088.5, when significant new information is added to the EIR after public noticing of the Draft EIR, the EIR must be recirculated to give the public a meaningful opportunity for review. Significant new information is defined as 1) a new significant environmental impact, 2) a substantial increase in the severity of an environmental impact requiring new mitigation, or 3) a feasible project alternative or mitigation measure considerably different from those previously analyzed that would clearly reduce environmental impacts. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

This Final Program EIR includes the following modifications to the Draft Program EIR:

- Additional information that provides more background and context for the EIR's setting and impact analyses.
- Revisions to the Standard and Specific Project Requirements (referred to as SPRs in the Draft Program EIR) incorporated into the planning, design, and implementation of the Dust Control Program. These revisions clarify and amplify the requirements that minimize and/or avoid potential adverse environmental effects that could occur with implementation of the proposed Dust Control Program.
- Revisions to Draft Program EIR Mitigation Measure REC-1. These revisions amplify
  and clarify the measures that could potentially minimize and/or avoid the significant
  recreation impact that could occur with implementation of the proposed Dust Control
  Program.
- Text changes throughout the document to provide clarity to the analysis, make minor text corrections, or fix grammatical or typographic errors.
- An updated Appendix B, Biological Resources Special-status Species Tables, which updated information replaces the appendix circulated with the Draft Program EIR.

These revisions do not constitute considerably different changes in the project description, environmental setting, conclusions of the environmental analysis, or in the mitigation requirements incorporated into the project or otherwise provide significant new information that would require recirculation of the Draft Program EIR pursuant to CEQA Guidelines section 15088.5.

#### 1.3 FINAL PROGRAM EIR ORGANIZATION

The Final Program EIR for the Oceano Dunes SVRA Dust Control Program is organized as follows:

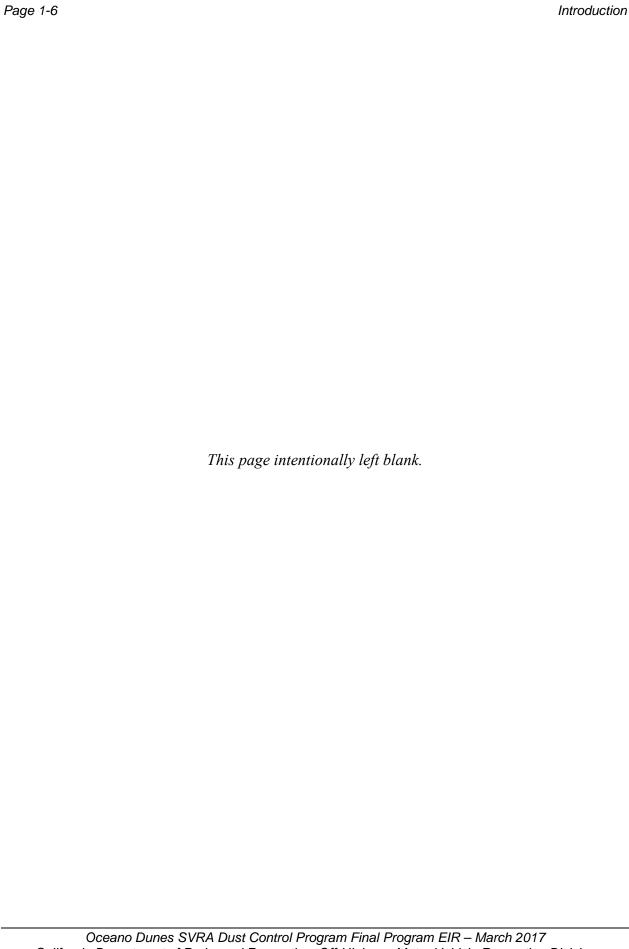
- Chapter 1, Introduction, explains the contents of a Final Program EIR and the environmental review process for the Oceano Dunes SVRA Dust Control Program.
- Chapter 2, Additional Information, describes and summarizes additional information related to the environmental analysis of the Oceano Dunes SVRA Dust Control Program and the effect this information has on the discussions contained in the Draft Program EIR.

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• Chapter 3, Errata and Revisions, includes the changes to the Draft Program EIR needed to address changes to the physical and regulatory setting, respond to comments, and clarify or amplify the information provided in the Draft Program EIR.

• Chapter 4, Responses to Comments on the Draft Program EIR, includes a copy and/or a summary of the written and oral comments received on the Draft Program EIR and the OHMVR Division's responses to significant environmental comments.

In accordance with section 15132 of the CEQA Guidelines, the Final Program EIR for the Oceano Dunes SVRA Dust Control Program consists of this document and the August 2, 2016 Draft Program EIR, Volumes 1 and 2.



Additional Information Page 2-1

#### CHAPTER 2 ADDITIONAL INFORMATION

This chapter presents additional information relevant to the environmental setting and analysis of the Oceano Dunes SVRA Dust Control Program. As discussed below, this new information clarifies and amplifies the information provided in the Draft Program EIR. The new information does not result in a new significant environmental impact, does not substantially increase the severity of any impact evaluated in the Draft Program EIR, and does not involve a feasible mitigation measure or project alternative that the OHMVR Division is electing not to implement. As such, this new information is not considered significant pursuant to CEQA Guidelines section 15088.5 and does not require recirculation of the Draft Program EIR.

#### 2.1 WESTERN SNOWY PLOVER AND CALIFORNIA LEAST TERN INFORMATION

Draft Program EIR Sections 2.2.6.2 and 7.2.2.2 provide information on habitat, species characteristics, and management of western snowy plover and California least tern at and near Pismo State Beach and Oceano Dunes SVRA. This Final Program EIR provides additional information regarding habitat for these species present at Pismo State Beach and Oceano Dunes SVRA and the activities the OHMVR Division undertakes to enhance these species' habitat and to protect their nesting sites.

#### 2.1.1 Western Snowy Plover

As explained in Draft Program EIR Section 7.2.2.2, western snowy plover is a federal-listed as threatened species and a California Species of Special Concern (CSSC). Pismo State Beach and Oceano Dunes SVRA, including the proposed Dust Control Program area, contain suitable breeding, foraging, and roosting habitat for western snowy plover; however, the proposed Program activities would avoid active western snowy plover nesting areas (Draft Program EIR page 7-15). The additional information below clarifies and amplifies the Draft Program EIR's discussion of suitable habitat features for western snowy plover breeding, foraging, and roosting.

#### 2.1.1.1 Suitable Habitat

Western snowy plovers winter and breed in the same habitats, consisting of mostly sandy, oceanfronting beaches, dry salt flats, and gravel bars (Page et al. 1995, Colwell et al. 2005, Brindock and Colwell 2011). Many beaches that support western snowy plover nesting, foraging, and wintering, are bordered to the east by dense stands of European beach grass (Ammophila arenaria), which often form an abrupt boundary that defines unsuitable habitat for western snowy plovers (Patrick and Colwell 2014). Western snowy plovers typically nest, forage, and winter on flat to gently sloping, wide beaches with plentiful food sources and sparse vegetation (Page et al. 1995, Colwell et al. 2005, MacDonald et al. 2010, Muir and Colwell 2010, Brindock and Colwell 2011). Selecting habitats that are open (or wide) and have less vegetative cover can facilitate early detection of predators and reduce predation risk (Muir and Colwell 2010, Brindock and Colwell 2011, Patrick and Colwell 2014). Western snowy plover nests have been found adjacent to small clumps of vegetation or other beach debris that likely provides additional cover making it more difficult for predators to spot (Page et al. 1985, Powell 2001). In addition, snowy plover broods have been observed hiding in vegetation clumps in response to adult alarm calls (Webber et al. 2013). As a result, variation in vegetation among and within breeding sites may influence the availability and selection of nest sites (Brusati et al. 2001).

#### 2.1.1.2 USFWS-Designated Critical Habitat

As explained in Draft Program EIR Section 7.2.2.2, the USFWS has designated a portion of the habitat suitable for western snowy plover present at Pismo State Beach and Oceano Dunes as

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"critical habitat." This Final Program EIR provides additional information regarding critical habitat for western snowy plover present at and near Pismo State Beach and Oceano Dunes SVRA.

As defined in the federal Endangered Species Act, critical habitat is a specific geographic area that contains features essential for the conservation of a listed species and that may require special management and protection. In determining critical habitat for listed species, the USFWS must identify the physical and biological features essential to the conservation of the species. Such features "support the life-history needs of the species, including but not limited to, water characteristics, soil type, geological features, sites, prey, vegetation, symbiotic species, or other features... Features may include habitat characteristics that support ephemeral or dynamic habitat conditions" (50 CFR § 424.02).

The USFWS finalized the current critical habitat designation for the Pacific Coast western snowy plover population in 2012 (USFWS 2012). The designation includes 24,527 acres in 60 units in Washington, Oregon, and California. The Pismo Beach/Nipomo Dunes unit (CA 31) contains 1,652 acres, of which 786 acres are located within Pismo State Beach and Oceano Dunes SVRA. The 786 acres of western snowy plover critical habitat present at Pismo State Beach and Oceano Dunes SVRA comprises 48 percent of the total critical habitat in the Pismo Beach / Nipomo Dunes unit (out of 1,652 acres), and 3 percent of the total critical habitat in Washington, Oregon, and California (out of 24,527 acres).

At Pismo State Beach and Oceano Dunes SVRA, the western snowy plover critical habitat area extends along the coast, beginning just north of Arroyo Grande Creek and extending through the southern end of Oceano Dunes SVRA. The entire Pismo Beach / Nipomo Dunes unit, including locations outside of Pismo State Beach and Oceano Dunes SVRA, extends about 12 miles along the coast from the north (upper) side of Arroyo Grande Creek just south of Strand Way to about 0.4 miles north of Mussel Point (USFWS 2011). The critical habitat unit includes portions of the Guadalupe-Nipomo Dunes National Wildlife Refuge, which is owned and managed by USFWS; the Guadalupe Oil Field, which is owned and managed by Chevron Corporation; Rancho Guadalupe County Park, which is owned and managed by the County of Santa Barbara; and private property, including Corralitos Ranch just north of Vandenberg Air Force Base.

The USFWS's critical habitat designation concluded the physical and biological features<sup>3</sup> essential to the conservation of western snowy plover included sandy beaches, dune systems immediately inland of an active beach face, salt flats, mud flats, seasonally exposed gravel bars, artificial salt ponds and adjoining levees, and dredge spoil sites, with:

- 1. Areas that are below heavily vegetated areas or developed areas and above the daily high tides:
- Shoreline habitat areas for feeding, with no or very sparse vegetation, that are between
  the annual low tide or low-water flow and annual high tide or high-water flow, subject to
  inundation but not constantly under water, that support small invertebrates, such as crabs,
  worms, flies, beetles, spiders, sand hoppers, clams, and ostracods, that are essential food
  sources;

At the time critical habitat was designated, the USFWS referred to the physical or biological features essential for the conservation of western snowy plover as "primary constituent elements"; however, this term is no longer included in federal Endangered Species Act regulations.

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3. Surf- or water-deposited organic debris, such as seaweed (including kelp and eelgrass) or driftwood located on open substrates that supports and attracts small invertebrates described in physical and biological features 2 (above) for food, and provides cover or shelter from predators and weather, and assists in avoidance of detection (crypsis) for nests, chicks, and incubating adults; and

4. Minimal disturbance from the presence of humans, pets, vehicles, or human-attracted predators, which provide relatively undisturbed areas for individual and population growth and for normal behavior (USFWS 2012).

In the final rule designating western snowy plover critical habitat in Pismo State Beach and the Oceano Dunes SVRA (USFWS 2012)), the USFWS acknowledged that portions of Oceano Dunes SVRA have been degraded by recreation activities. For example, past and ongoing motorized and pedestrian recreation in these areas disturb western snowy plover, particularly during the breeding season, when park visitation rates are high. However, this habitat degradation did not preclude the USFWS from designating these areas as critical habitat if the areas contain physical or biological features essential to the conservation of the western snowy plover and otherwise meet the definition of critical habitat. The USFWS noted use of an area for recreational activities does not preclude the use of the area by western snowy plover (USFWS 2012). The USFWS's critical habitat designation noted that Pismo State Beach and the Oceano Dunes SVRA include the following physical and biological features essential to western snowy plover: wind-blown sand dunes, areas of sandy beach above and below the high-tide line with occasional surf-cast wrack supporting small invertebrates, and generally barren to sparsely vegetated terrain (USFWS 2012).

As shown on Draft Program EIR Figure 2-5, western snowy plover critical habitat is located adjacent to, and contiguous with, the proposed Dust Control Program area's northwest corner; however, the proposed Program area does not contain any USFWS-designated critical habitat for western snowy plover. Chapter 3 of this Final Program EIR contains new Figure 7-2, which shows the relationship and proximity between the proposed Dust Control Program area and USFWS-designated critical habitat area for western snowy plover at a smaller scale (i.e., more zoomed in).

#### 2.1.2 California Least Tern

As explained in Draft Program EIR Section 7.2.2.2, California least tern is a state- and federal-endangered species and a California Fully Protected Species. Pismo State Beach and Oceano Dunes SVRA, including the proposed Dust Control Program area, contain suitable breeding, foraging, and roosting habitat for California least tern; however, the proposed Program activities would avoid active California least tern nesting areas (Draft Program EIR page 7-15). The additional information below clarifies and amplifies the Draft Program EIR's discussion of suitable habitat features for California least tern breeding.

#### 2.1.2.1 Suitable Habitat

California least tern often nest in habitats similar to those of western snowy plover, and there is often an overlap with the two species breeding on the same beach (Powell and Collier 2000, USFWS 2007). California least tern nesting colonies along the California coast are typically located on broad dune-backed sandy beaches or small sandspits where vegetation is either sparse or altogether absent (Page et al. 1995). Nests may be found from within several feet of the shore to more than a mile inland. Nests are normally located in open areas where aerial and terrestrial

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predators can be detected at a distance. When threatened, adult California least tern will leave the nest and aggressively harass an intruder by mobbing, defecating, and vocalizing.

## 2.1.3 Western Snowy Plover / California Least Tern Habitat and Predator Management Strategy

As stated above, Pismo State Beach and Oceano Dunes SVRA contain suitable breeding, foraging, and roosting habitat for western snowy plover and California least tern. As a result, OHMVR Division must fulfill its mission to balance recreation impacts with programs that conserve and protect these natural resources. Draft Program EIR Section 2.2.6.2 (page 2-11) briefly describes the management strategy within the Oceano Dunes District to enhance western snowy plover and California least tern habitat and protect these species from predators. The additional information below clarifies and amplifies the Draft Program EIR's discussion of this management strategy, which has been successful at protecting breeding and increasing overall population (i.e., number of breeding adults) and reproductive success (i.e., number of fledglings per nesting pair) for both western snowy plover and California least tern in the Oceano Dunes District.

#### 2.1.3.1 Seasonal Nest Exclosure and Other Nest Protection

Each year, from approximately March 1 to September 30, the OHMVR Division encloses approximately 300 acres of Oceano Dunes SVRA open riding area within a six-foot-tall seasonal exclosure (i.e., predator fence).

The seasonal nesting exclosure is intended to enhance western snowy plover and California least tern habitat by protecting nest sites from humans and predators. The public is prohibited from entering the seasonal exclosure area. The seasonal exclosure is made of a lower layer of 2-inch by 4-inch "non-climb fence" and an upper layer of mesh. The fence is buried in the sand up to 18 inches to discourage coyotes and other potential mammalian predators from digging into the nesting area and depredating a nest. In addition, bird spikes (e.g., Nixalite) are installed on some poles to discourage avian predators from roosting near the seasonal exclosures. The exclosure fencing is maintained a minimum of 100 meters (330 feet) from active California least tern nesting areas. The area of this additional buffer varies depending on the locations of nests, but in 2016 was about 12 acres, installed incrementally as nests were found. This additional buffer, if needed, is not erected for as long a period as the main exclosure fencing because least terns typically are only actively breeding from May through August, although they may arrive as early as April.

Additional areas where western snowy plover and California least tern are known to nest are also protected from public disturbance; however, instead of a seasonal exclosure, symbolic fencing and signs are used to keep the public out of nesting habitat. Symbolic fencing consists of rope strung between metal posts. Symbolic fencing does not exclude avian or mammalian predators.

OHMVR Division staff also selectively install smaller wire exclosures, including: 200-foot-diameter single-nest exclosures around western snowy plover and 330-foot-diameter) single-nest exclosures around California least tern nests found in the open riding area and outside the seasonal exclosure; smaller single-nest exclosures of varying sizes around western snowy plover found in non-vehicular areas outside the seasonal exclosure; and, much smaller (10 feet or less across) mini-exclosures around western snowy plover nests within larger seasonal exclosures to provide additional protection from human disturbance and mammalian predators. A mesh top is added to mini-exclosures, when necessary, to protect nests from avian predation.

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#### 2.1.3.2 Monitoring

Daily monitoring of western snowy plover and California least tern occurs from March 1 to September 30. At a minimum, three monitors are present during the morning and early afternoon hours. As the season progresses, monitoring increases to include the late afternoon and early evening hours. Monitoring breeding exclosures involves walking to assess or find new nests, as well as scanning nests and broods from vehicles parked outside the seasonal exclosure. Monitors check most western snowy plover and California least tern nests daily. Monitoring always occurs in a manner that minimizes disturbance or adverse effects to adult birds, nests, and chicks.

Monitoring of the open riding area also occurs daily. Monitoring of the open riding area involves driving a vehicle along defined transects looking for western snowy plover and California least tern nests and/or chicks. Areas along the transects with signs of nest activity (e.g., scraping or copulating birds) are checked more thoroughly on foot and with increased frequency using binoculars and/or a spotting scope. When monitors find chicks in the open riding area, the area is closed to vehicles and monitors are present to control traffic and ensure vehicles are kept from disturbing the chicks. Additional monitors are posted in vehicles at various distances from the chicks to track their movement. Chicks are slowly directed back into the protected seasonal exclosure by monitors who slowly and carefully walk near the chicks and encourage movement in the direction of a protected area. If necessary, additional monitors are also present to watch for potential avian predators, such as gulls, and flush them from the area. Monitors continue to watch chicks once directed back into the seasonal exclosure to confirm they remain in the protected area.

In addition, during the breeding season, California least tern may assemble in a night roost. Monitors record the night roost location and total numbers of individuals present as California least terns arrive at dusk. Night vision goggles are available and used for this task, but they have limited range for viewing from a distance. As a result, there are occasions when California least terns are heard vocalizing but not seen because they arrive after it is too dark to see. Therefore, the counts are minimum counts due to the limited visibility of night roosts.

Small freshwater lakes are also periodically surveyed for California least tern use. During the surveys, the monitors determine if the lakes provide additional appropriately-sized fish to feed chicks. Monitors also observe the direction of adult California least tern flight in order to determine the directions of other foraging sources.

#### 2.1.4 Predator Monitoring and Control

Predators and predation can be important factors for limiting California least tern and western snowy plover nest success by directly depredating eggs, chicks, juveniles, or adults or indirectly by increasing time spent by adults in vigilance of avoidance behavior and reducing incubating and/or brooding behavior. As a result, the Oceano Dunes District implements a predator monitoring and control program to protect nesting western snowy plover and California least tern.

Multiple methods are used for California least tern and western snowy plover protection from potential predators, including surveying, hazing, trapping, calling, shooting, and spotlighting. During the breeding season, monitors directly observe mammalian and avian predators and their sign (e.g., tracks, scat, regurgitated pellets, prey remains, depredated nests) each day on foot and from vehicles and record species, type of sign, behavior (if observed), duration of observation, direction of travel, and any characteristics that may identify an individual predator. Predator

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surveys are currently regularly conducted in the revegetation islands, seasonal exclosure, and the Oso Flaco area.

The most common predator management activities conducted in Oceano Dunes SVRA include the large seasonal exclosure, removing animal carcasses (which attract scavengers) in or adjacent to California least tern and western snowy plover nesting and brood-rearing habitat, and harassing predators (i.e., avian predators) to flush them from sensitive areas. Harassment of predators is conducted using hazing techniques, including firing a bird whistler and waving arms and making noise while approaching an avian predator on foot or by vehicle. A bird whistler is a handheld launcher that fires a projectile 250 to 300 feet and makes a loud "screech" sound, bright light, and trail of smoke when fired without harming the bird. The bird whistler can be fired from a vehicle, which can limit disturbance to western snowy plover and California least tern when it would otherwise be disruptive to approach a predator on foot in breeding habitat.

Predation is known to be an ongoing threat to western snowy plovers and California least terns in Oceano Dunes SVRA. As a result, the Oceano Dunes District implements direct predator controls within Oceano Dunes SVRA. Selective live-trapping, relocation, and lethal removal of avian predators is conducted by qualified avian control specialists, and selective live-trapping and lethal removal of mammalian predators is conducted by the U.S. Department of Agriculture's Wildlife Services program. From 2006 to 2016, these predator controls resulted in the relocation of between 2 and 20 avian predators per year, the lethal removal of 0 to 23 avian predators per year, and the lethal removal of 5 to 19 mammalian predators per year. These predator control methods have helped increase the overall population (i.e., number of breeding adults) and reproductive success (i.e., number of fledglings per nesting pair) for both western snowy plover and California least tern in the Oceano Dunes District.

#### 2.2 CARB AIR QUALITY MODELING

Draft Program EIR Section 2.3.1.1 provides the basis for the proposed Dust Control Program area. Subsequent to the release of the Draft Program EIR, the OHMVR Division, SLOAPCD, and California Air Resources Board (CARB) commenced development of a 3-dimensional atmospheric and terrain model of Ocean Dunes SVRA and downwind areas of the Mesa. The model, combined with data previously collected by the OHMVR Division (see Draft Program EIR Section 1.1.3), will be used by a joint technical committee of the OHMVR Division, the SLOAPCD, and CARB scientists to predict PM10 concentrations downwind of Oceano Dunes SVRA under meteorological scenarios. Accordingly, the model could allow the technical committee to determine the best locations, type and amount of dust reduction measures needed to meet the requirements of Rule 1001. The development of the model is in its preliminary stages, and there is no schedule established for its completion.

#### 2.3 SEA LEVEL RISE AND RECREATION OPPORTUNITIES

The Draft Program EIR notes that the Pacific Ocean shoreline and the areas surrounding the Dune Lakes region are in the FEMA 100-year floodplain, which means that in any given year, the risk of flooding in the designated area is 1%.

In the future, risks from flooding may increase as ocean levels rise as a result of climate change. But, in general, Pismo State Beach and Oceano Dunes SVRA would not be substantially impacted by sea level rise. The National Oceanic and Atmospheric Administration (NOAA) online Sea Level Rise and Coastal Flooding Impact Viewer shows that only low lying areas and areas near the existing mean higher high water mark would be subject to inundation with a five-foot rise in sea level (expected to occur sometime after the year 2050 but before the year 2100

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based on current projections). Similarly, the San Luis Obispo County Climate Action Plan identifies the County anticipates a 3.3 to 4.6 feet in sea level rise along the coast by 2100 (this rise is in addition to an eight-inch rise already observed). Chapter 3 of this Final Program EIR contains new Figure 9-1, which shows projected sea level rise in the vicinity of the Dust Control Program area.

As sea level rises, near-shore land that is currently open to recreation would become submerged, reducing the size of the recreation area below what it currently is available. This effect could combine with the significant and unavoidable cumulative impact on coastal vehicular recreation identified in Draft Program EIR CML-1; however, there is no guarantee that any change in recreation lands identified in the Draft Program EIR would persist into the future as seas rise (e.g., seasonal dust control measures are proposed for five years only). In addition, as described on Draft Program EIR page 2-4, as sea level rises, so do dune elevations, and it is possible the natural dune building process would overtake any vegetation planted as part of the proposed Dust Control Program, eliminating any potential cumulative impact. Thus, although the effects of sea level rise could combine with Draft Program EIR Impact CML-1, the extent of this combined impact is uncertain. Accordingly, this information does not result in a new or substantially more severe impact than that identified in the Draft Program EIR.

#### 2.4 ASSEMBLY BILL 2616

In September 2016 (after the OHMVR Division released the Draft Program EIR), Governor Brown signed into law Assembly Bill 2616, which: 1) amends the findings and declarations of the Coastal Act to advance the principles of environmental justice and equality; 2) modifies the CCC to require one commissioner to reside in, and work directly with, communities in the state that are disproportionately burdened by, and vulnerable to, high levels of pollution and issues of environmental justice; and 3) amends the development control provisions of the Coastal Act to specify that when acting on a coastal development permit, the issuing agency, or the commission on appeal, may consider environmental justice, or the equitable distribution of environmental benefits throughout the state. For the purposes of the Coastal Act, Assembly Bill 2616 defines "Environmental Justice" to mean "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." As a result of the passage of Assembly Bill 2616, the CCC, when processing the OHMVR Division's Dust Control Program CDP application, may consider environmental justice or the equitable distribution of environmental benefits throughout the state. Matters pertaining to the CCC's administrative authority and procedures for processing a CDP application are outside the scope of the OHMVR Division's CEQA review of the proposed Dust Control Program. Assembly Bill 2616 does not amend Chapter 3, Coastal Resources Planning and Management Policies, of the Coastal Act, which as explained in Draft Program EIR Chapter 5 is the standard of review for the Dust Control Program CDP permit. As such, Assembly Bill 2616 is not significant new information that changes the findings of the Draft Program EIR. Nonetheless, the proposed Dust Control Program would not alter visitor access levels and does not have the potential to result in the unfair treatment of any person.

#### 2.5 OSO FLACO / RULE 1001 CONTROL SITE MONITOR

The Draft Program EIR explains the OHMVR Division installed an air quality monitoring station, the Oso Flaco station, in the southeast corner of Oceano Dunes SVRA in June 2015. This monitor was intended to serve as the control site monitor required by Rule 1001. In December 2016, the OHMVR Division removed monitoring equipment from this site, although supporting infrastructure remains in place (e.g., platforms, solar posts). The OHMVR Division plans to re-

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install the Oso Flaco monitoring equipment in Spring or Summer 2017. The OHMVR Division would operate the Oso Flaco monitor until a new control site monitor location is approved by CARB and the SLOAPCD. If the Oso Flaco monitoring station equipment and infrastructure were to be permanently removed in the future, the OHMVR Division would restore the site to its previous conditions consistent with the CDP issued for the station.

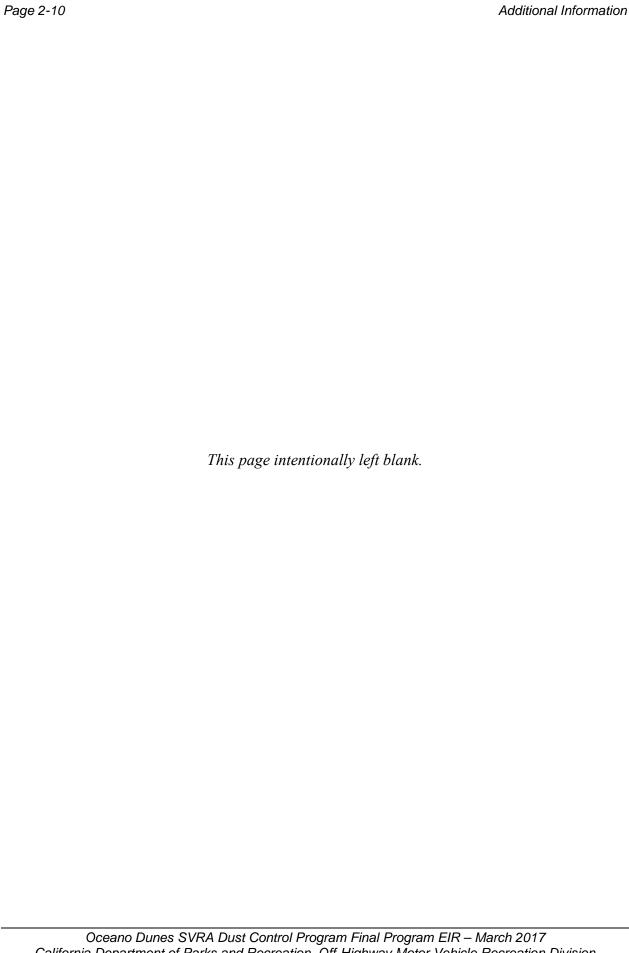
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#### CHAPTER 3 ERRATA AND REVISIONS

This chapter provides amended text and graphics for the Oceano Dunes SVRA Dust Control Program Draft Program EIR. Text revisions are organized by Draft Program EIR chapter. Additions to the Draft Program EIR text are shown with <u>underlining</u> and text removed from the Draft EIR is shown with <u>strikethrough</u>.

Revised and additional figures are provided at the end of this chapter. Draft Program EIR Figure 2-1 has been revised to more clearly show the SLO and Santa Barbara County line and Draft Program EIR Figure 2-4 has been revised to show ongoing and completed dust control projects at a larger scale. Draft Program EIR. New Figure 7-2 has been added to this Final Program EIR to graphically depict the proposed Dust Control Program area and western snowy plover critical habitat at a larger scale, and new Figure 9-2 has been added to this Final Program EIR to show projected sea level rise near the Program Area.

#### 3.1 EIR SUMMARY

On page S-4 of the Draft Program EIR, Mitigation Measure REC-1 has been revised as follows:

# Mitigation Measure REC-1: Minimize Loss of OHV Coastal Vehicular Recreation Opportunities

The OHMVR Division shall minimize the loss of OHV coastal vehicular recreational opportunities at Oceano Dunes SVRA by:

- Planting vegetation outside the Oceano Dunes SVRA open riding and camping area
- Planting vegetation and deploying seasonal dust control measures in a manner that does not interfere with the Oceano Dunes SVRA "Sand Highway" and other established paths of travel in the SVRA
- Deploying seasonal dust control measures from March 1st through September 30th only
- Considering potential hazards to public recreation from the seasonal deployment of dust control measures (e.g., ensuring that areas are safe for resumption of OHV recreation following removal of the project)
- Integrating recreation opportunities, including OHV recreation opportunities, into dust control measures. This could be achieved by:
  - Educational kiosks that highlight the progression of dune vegetation / ecosystems
  - Establishing and maintaining motorized and non-motorized trails through large, continuous blocks of planted vegetation
  - o Embedding OHV training or vendor areas in dust control measures large enough to support such areas
- Identifying areas to provide additional camping or OHV recreation opportunity and diligently pursue opening those areas to OHV recreation with existing staff levels and funding considerations. Any such expansion shall occur in a manner that is consistent with the Public Resources Code and other applicable laws and

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regulations and shall not impede achievement of the performance standard set by Rule 1001.

- The additional camping and/or OHV recreation opportunities to be pursued as part of this measure shall be, to the maximum extent feasible, similar to the type and amount of land affected as a result of the proposed Dust Control Program. Specifically, the OHMVR Division shall, if feasible, provide a 1:1 replacement of coastal vehicular recreation lands within the same regional geographic location as Oceano Dunes SVRA. For the purposes of this measure, inland OHV recreation opportunities are not considered similar to the opportunities provided by Oceano Dunes SVRA.
- O The OHMVR Division shall actively research and identify opportunities to provide additional camping and/or OHV recreation opportunities until three years after the completion of the propose Dust Control Program, or 2025, whichever is later. If additional opportunities are not identified by this time, they shall be considered to not be available to the OHMVR Division.

## 3.2 Introduction (Draft Program EIR Chapter 1)

On page 1-7 of the Draft Program EIR, the second bullet point describing the report entitled "Dust Control Project ODSVRA 2016" has been revised as follows:

Dust Control Project ODSVRA 2016 (DRI 2015c): This OHMVR Division study evaluated the effectiveness of seasonal dust control measures installed at Oceano Dunes SVRA. The study concluded that seasonal dust control measures installed in 2015 were more effective than measures installed in 2014 and showed quantifiable reductions in PM10 concentrations due to the controls. Overall, the OHMVR Division's 2015 wind fence array reduced sand transport within the array by 73 percent on average and up to 87% for areas in the interior of the array. In addition, over the three-month period the fencing was in place, the downwind concentration of PM10 at the trailing edge of the fence array was approximately 20% to 37% lower than the upwind PM10 concentration during moderate windy periods (approximately 10 to 12 miles per hour); during high wind conditions downwind concentrations were approximately 5% to 30% lower than concentrations upwind of the fence array. Despite reductions immediately downwind of the fencing array, a preliminary Subsequent SLOAPCD analysis has indicated that the 2015 seasonal dust control measures may not have been effective at reducing PM10 levels at the SLOAPCD's CDF station; however, this preliminary finding may due to anomalous meteorological conditions in 2015, particularly in May 2015 (SLOAPCD 2016a and Zeldin and Tupper 2015).

On Page 1-7 of the Draft Program EIR, the last paragraph has been revised as follows:

The OHMVR Division and the SLOAPCD collaborated on the development and analysis of most of the studies listed above. Although all of the specific findings and conclusions of each report have not been fully accepted by both agencies, the OHMVR Division and the SLOAPCD, together with CARB, have reached a general consensus on an approach to dust control at Oceano Dunes SVRA that is reflected in, and forms the basis for, the proposed Oceano Dunes Dust Control Program.

On Draft Program EIR page 1-9, the description of the Control Site Monitor in Table 1-2 has been revised as follows:

The Control Site Monitor is the OHMVR Division's FEM PM10 monitor installed south of Oso Flaco Lake (35°0'36.5" North latitude, 120°36'14.5" West longitude) unless and until a new control site monitor location is approved by CARB and the SLOAPCD.

On page 1-14 of the Draft Program EIR, the following reference has been added:

San Luis Obispo County Air Pollution Control District 2016a. 2015 Annual Air Quality Report. San Luis Obispo, CA. September 2016.

## 3.3 PROJECT DESCRIPTION (DRAFT PROGRAM EIR CHAPTER 2)

On page 2-5 of the Draft Program EIR, text describing the dune setting has been revised as follows:

At the time [Oceano Dunes SVRA] was established for OHV recreational use, [CDPR] adopted the policy that there would be no net loss of vegetation throughout the park. Numerous maintenance and revegetation efforts were initiated, including straw mulching and hydroseeding in the vicinity of 40-Acre Woods and Oso Flaco Lake in 1986/87 and the establishment of foredunes northwest and west of Oso Flaco Lake between 1989 and 1992.

On page 2-10 of the Draft Program EIR, the discussion of the camping limits has been revised as follows:

Amendment 5 to this CDP, approved in 2001, sets an interim limit of 1,000 overnight camping units at Oceano Dunes SVRA (defined as one street-legal vehicle that enters the park under its own power), although the permit limit does not apply on Memorial Day, July 4<sup>th</sup>, Labor Day, and Thanksgiving.

On page 2-15 of the Draft Program EIR, the discussion of the OHMVR Division's Oso Flaco monitoring station has been revised as follows:

In May June 2015, the OHMVR Division installed an air quality monitoring station, the Oso Flaco station, in the southeast corner of Oceano Dunes SVRA (see Figure 2-4). The approximately 0.4-acre site includes a PM10 BAM monitor enclosed in a small, weatherproof container, meteorological monitoring equipment (mounted on a 10-meter tower), and five solar panels with associated solar charging and battery-backup systems. The monitor is intended to serve as the control site monitor required by Rule 1001. The monitor was installed after the NOP for this EIR was issued and as such is not part of the baseline environmental conditions at Oceano Dunes SVRA. The OHMVR Division removed the Oso Flaco monitoring equipment in December 2016 (leaving infrastructure in place), but plans to re-install the equipment in Spring or Summer 2017. The Oso Flaco station would be operated until a new control site monitor location is approved by CARB and the SLOACPD. Accordingly, the combined impacts from the potential re-installation of equipment and /or relocation and operation of the Oso Flaco station and the proposed Dust Control Program are evaluated in Chapter 11 (Cumulative Impacts). Due to its nature as a control monitor, the Oso Flaco monitor would not be reinstalled in an area open to vehicular recreation and would not have the potential to combine with most of the proposed Program's impacts.

On page 2-16 of the Draft Program EIR, the discussion of the 2014 straw bale project has been revised as follows:

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In March 2014, the OHMVR Division installed approximately 5,000 straw bales on a 30acre area along the eastern boundary of Oceano Dunes SVRA, outside of the SVRA's open riding and camping area (see Figure 2-4). These straw bales were left in place and have become partially buried. The plans are to allow any straw bales that remain to provide ground cover for potential vegetation projects. For example, in 2014, approximately six acres of straw bales were incorporated into a restoration project and an additional five acres were vegetated in 2015. Some of the straw bales in these two restoration areas were broken up and incorporated as part of the vegetation planting. In addition, at the request of the CCC, the OHMVR Division intends to remove as many straw bales as feasible; however, since the 30-acre straw bale project was completed prior to the release of the NOP for this EIR, and remains in place, these straw bales are part of the baseline environmental conditions against which the EIR evaluates potential Dust Control Program impacts. The OHMVR Division anticipates that most straw bales would remain in place, and that there would be few, if any, straw bales removed due to logistical difficulties (e.g., not feasible to dig out buried straw bales, bales may break up when being removed, etc.).

On page 2-16 of the Draft Program EIR, the discussion of seasonal wind fencing arrays has been revised as follows:

The OHMVR Division has deployed three wind fencing arrays at Oceano Dunes SVRA. In 2014 (March to July), the OHMVR Division installed a 15-acre array approximately 1,850 feet southeast of marker post 5. In 2015 (March to July), the OHMVR Division installed a 40-acre array on the east side of Sand Highway (see Figure 2-4). In 2016 (March to July), the OHMVR Division installed an approximately 40-acre array in the same location as the 2015 array. These arrays consisted of four-foot-high, orange-colored wind fencing rows oriented perpendicular to the prevailing wind direction and spaced every 20 to 40 feet apart (or more, depending on topography). Several rows of fencing became buried over the course of the project. This wind fencing has been or will be removed the year it was installed and has no potential to result in impacts that could combine with the proposed Dust Control Program activities. Since the 2015 and 2016 arrays were not in place at the time the installed after the Notice of Preparation was issued for this EIR and subsequently removed in the same year they were each installed, these seasonal wind fencing projects are not part of the baseline environmental conditions at Oceano Dunes SVRA and thus have no potential to result in impacts that could combine with the proposed Dust Control Program activities.

On page 2-16 and 2-17 of the Draft Program EIR, the discussion of the April 2016 porous roughness element (PRE) array has been revised as follows:

In April 2016, the OHMVR Division installed an approximately 0.6-acre array of "porous roughness elements" (PREs, reminiscent of a dog crate) consisting of rectangular, approximately 3-feet-long by 2-feet-wide by 2 feet-high crates wrapped in mesh fencing material, each with a smaller crate, also wrapped in fencing material, nested inside of the larger crate. These nested, three dimensional PREs have increased aerodynamic drag and promote greater sand capture and deposition as compared to two-dimensional wind fencing and non-porous (i.e., solid) three-dimensional roughness elements such as straw bales. The PREs (approximately 150) were installed under an emergency permit from the CCC, which requireds the PRE's to be removed no later than August 31, 2016. Since the 2015 and 2016 PRE arrays waswere not in place at the time the Notice of Preparation was issued for this Draft EIR (February 2015, see Section 1.5.1), these this seasonal wind

fencing PRE projects is are not part of the baseline environmental conditions against which the EIR evaluates potential Program impacts.:. however Furthermore, this PRE array was removed in Fall 2016 and as such has no potential to result in impacts that could combine with the proposed Dust Control Program activities.

On page 2-16 of the Draft Program EIR, the discussion of the other pilot and demonstration projects has been revised as follows:

In Spring 2015, the SLOAPCD and the OHMVR Division proposed the use of soil stabilizers on an approximately two-acre area east of the northern end of Sand Highway (see Figure 2-4); however, this proposal was rejected by the CCC. Please refer to Section 2.3.2.34 for additional information on soil stabilizers.

On page 2-18 of the Draft Program EIR, the text describing the basis for the proposed Dust Control Program has been revised as follows:

The proposed Program area includes the portion of Oceano Dunes SVRA located between approximately 280 degrees to 315 degrees upwind of the SLOAPCD's CDF ambient air quality monitoring station (see Figure 2-5). The Program area includes most of the open sand areas in the central to northern portion of the Oceano Dunes SVRA open riding and camping area, commonly referred to as the "La Grande Tract." This part of Oceano Dunes SVRA is owned primarily by the County; however, the OHMVR Division has entered into an operating agreement with the County to operate this land. SLOAPCD and OHMVR Division studies have identified this area as the area most likely influencing air quality measurements at the CDF station and air quality conditions on the Nipomo Mesa (see Section 1.1.2). The proposed Program area also includes the areas where seasonal wind fencing and straw bale arrays were implemented in 2014, 2015, and 2016 by the OHMVR Division and SLOACPD, in consultation with CARB (see Sections 2.2.7.4). Finally, the proposed Program area is situated in the middle of the SLOAPCD's CDF air quality forecast zone, which is the zone that experiences the worst air quality conditions during high wind and dust events.

On page 2-18 of the Draft Program EIR, Footnote 5 describing the exact acreage of the proposed Dust Control Program area has been revised as follows:

On page 2-31 to 2-32 of the Draft Program EIR, Section 2.4 describing the proposed schedule of activities has been revised as follows:

## **2.4 SCHEDULE OF ACTIVITIES**

The OHMVR Division proposes to implement the Dust Control Program for an approximately five-year period, estimated to begin in spring 2017 and continue through late 2022 or 2023. In general, vegetation projects would be planted in the fall of each calendar year, beginning in the fall or early winter of 2017 and occurring each fall or winter until 2022. Seasonal dust control measures would be deployed from as early as March 1 and remain in place as late as September 30 of each calendar year. The OHMVR Division would remove all seasonal dust control measures as feasible; however, straw bales or other seasonal measures that become partially or fully buried and which cannot be reasonably removed could remain in place during and after the five-year period

<sup>&</sup>lt;sup>5</sup> The exact acreage of this primary Dust Control Program area is 688 acres. <u>Together</u> with the potential 295-acre tree planting area, the exact total acreage of the Dust Control Program area is 983 acres.

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considered by this EIR. Any structural, track-out solution would be a capital outlay project that requires the appropriation of funds by the State Legislature. The OHMVR Division would concurrently work to obtain proposals for professional services as well as agency approvals; however, an 18- to 24-month timeline from the appropriation of funds is anticipated before track-out prevention devices would be fully operational. Since funds have not yet been appropriated, the OHMVR Division would not be able to install track-out infrastructure until December 2018 at the earliest.

#### 2.4.1 Dust Control Program Annual Review

As described in Section 1.3, this EIR is a Program EIR, which requires the OHMVR Division to consider subsequent dust control activities against the scope and content of this EIR to determine if additional environmental review is required. In addition, as described in Section 1.4.2, the OHMVR Division has applied for a Master CDP from the CCC, which requires the CCC and other agencies to review specific dust control activities to ensure they are in compliance with the CDP issued for the project. In light of these review requirements, the OHMVR Division is proposing the following process for the annual review of dust control measures and activities:

## **Vegetation and Tree Planting Projects**

#### The OHMVR Division shall:

- By August 1 of each year (beginning in 2017), submit to the CCC, CDFW, and USFWS for review, a "Draft Oceano Dunes SVRA Dust Control Program Planting Plan" that:
  - o <u>Identifies the location (including any access routes)</u>, size, and species composition of the planned planting activities;
  - o <u>Describes the planting methods that would be employed by the OHMVR Division (e.g., hand planting, broadcast seed);</u>
  - O Describes the site-specific resources that are present or have the potential to be present at or near the planting areas and the measures that would be implemented to minimize and avoid potential adverse impacts from planting activities. As part of this description, the OHMVR Division shall summarize all biological and cultural resource evaluations that occurred for planned vegetation and tree planting activities, including all necessary records searches, Native American consultations, and site-specific survey results; and
  - Evaluates the proposed planting projects for consistency with the Dust Control Program EIR and any applicable CDP conditions.
  - Summarizes any Dust Control Program-related planting activities undertaken during the previous growing season. This summary shall:
    - Describe the status and success (e.g., photo monitoring results, air quality monitoring results, replanting efforts, invasive species issues) of the plantings;
    - Evaluate whether measures incorporated into the planned activities to avoid or minimize the adverse impacts of the activities were effective and successful (i.e., avoided impacts); and

 Evaluate whether planting activities have occurred in compliance with applicable conditions and requirements (i.e., CDP, EIR mitigation measures).

- By October 1 of each year (beginning in 2017), submit to the CCC, CDFW, and USFWS, and make available to the public, a "Final Oceano Dunes SVRA Dust Control Program Planting Plan" that addresses any comments received from the CCC, CDFW, and USFWS on the draft planting plan. The OHMVR Division may provide notice that a final planting plan is available via email or mail, and shall post the final planting plan on its website. The public may comment on the final planting plan, but the OHMVR Division would not be required to revise the final planting plan to reflect public comments.
- By November 15 of each year (beginning in 2017), obtain approval from all necessary agencies, and proceed with the planned planting activities. By November 15 of each year, the OHMVR Division shall also provide to the CCC evidence the OHMVR Division is authorized to proceed with planned planting activities on lands not operated by the state.

#### **Seasonal Dust Control Measures**

Given the proposed schedule of activities, the OHMVR Division would need to commence Spring 2017 seasonal dust control measures immediately following receipt of all project permits and approvals. For Spring 2017 seasonal dust control measures, the OHMVR Division shall submit to the CCC and make available for review a "2017 Oceano Dunes SVRA Seasonal Dust Control Plan" that identifies the location, size, and type of planned seasonal dust control measures, describes the installation, maintenance, and removal of these measures, and describes the site specific-resources that are present or have the potential to be present at or near the seasonal dust control measures and the measures the would be implemented to minimize and avoid potential adverse impacts from planting activities. As part of this plan, the OHMVR Division shall summarize all biological and cultural resource evaluations that occurred for planned seasonal dust control measures, including all necessary records searches, Native American consultations, and site-specific survey results. In addition, by December 1, 2017, the OHMVR Division shall submit a summary of the 2017 seasonal dust control measures to the CCC as described below.

For seasonal dust control measures planned for deployment after 2017, The OHMVR Division shall:

- By December 1 of each year (beginning in 2017), submit to the CCC, CDFW, and USFWS for review, a "Draft Oceano Dunes SVRA Seasonal Dust Control Plan" that:
  - Identifies the location (including any access routes), size, and type (e.g., fencing, PREs, pilot projects) of planned seasonal dust control measures;
  - Describes the methods that would be employed by the OHMVR Division to install, maintain, and remove seasonal dust control measures;
  - Describes the site specific-resources that are present or have the potential to be present at or near the seasonal dust control project areas and the measures that would be implemented to minimize and avoid potential adverse impacts

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- from seasonal dust control activities. As part of this description, the OHMVR Division shall summarize all biological and cultural resource evaluations that occurred for planned seasonal dust control measures, including all necessary records searches, Native American consultations, and site-specific survey results; and
- o Evaluates the proposed seasonal dust control measures for consistency with the Dust Control Program EIR and any applicable CDP conditions.
- o <u>Summarizes the seasonal dust control measures undertaken the previous spring.</u> This summary shall:
  - Describe the status and success (e.g., air quality monitoring results) of the seasonal dust control measures;
  - Evaluate whether measures incorporated into the planned activities to avoid or minimize the adverse impacts of the activities were effective and successful (i.e., avoided impacts); and
  - Evaluate whether seasonal dust control activities have occurred in compliance with applicable conditions and requirements (e.g., CDP, EIR mitigation measures).
- By February 1 of each year (beginning in 2018), submit to the CCC, CDFW, and USFWS, and make available to the public a "Final Oceano Dunes SVRA Seasonal Dust Control Plan" which addresses any comments received from the CCC, CDFW, and USFWS on the draft seasonal dust control plan. The OHMVR Division may provide notice that a final seasonal dust control plan is available via email or mail, and shall post the final plan on its website. The public may comment on the final seasonal dust control plan, but the OHMVR Division would not be required to revise the final plan to reflect public comments.
- By March 1 of each year (beginning in 2018), obtain approval from all necessary agencies, and proceed with the planned seasonal dust control activities.
- Planning: Starting June 1 of each year (beginning in 2017), the OHMVR Division shall develop a list of potential dust control and monitoring projects for implementation in the coming 12-month period, evaluate potential projects for consistency with the Dust Control Program EIR and any CDP conditions, and coordinate with the APCD on final planned activities. This planning phase would conclude by August 31 of the same year. As part of this planning process, the OHMVR Division shall identify whether activities would take place on stateleased lands and, if necessary, secure authorization to proceed with projects on leased lands.
- Resource Evaluation: By July 1 of each year, the OHMVR Division shall initiate
  biological and cultural resource evaluations for planned activities, including all
  necessary records searches, Native American consultations, and site-specific
  surveys. This resource evaluation phase would conclude by September 30 of the
  same year.
- Agency Reporting and Review: By October 1 of each year, the OHMVR
   Division shall submit to the CCC (Central Coast Office), a draft "Oceano Dunes
   SVRA Year-End Summary and Annual Work Plan" report that:

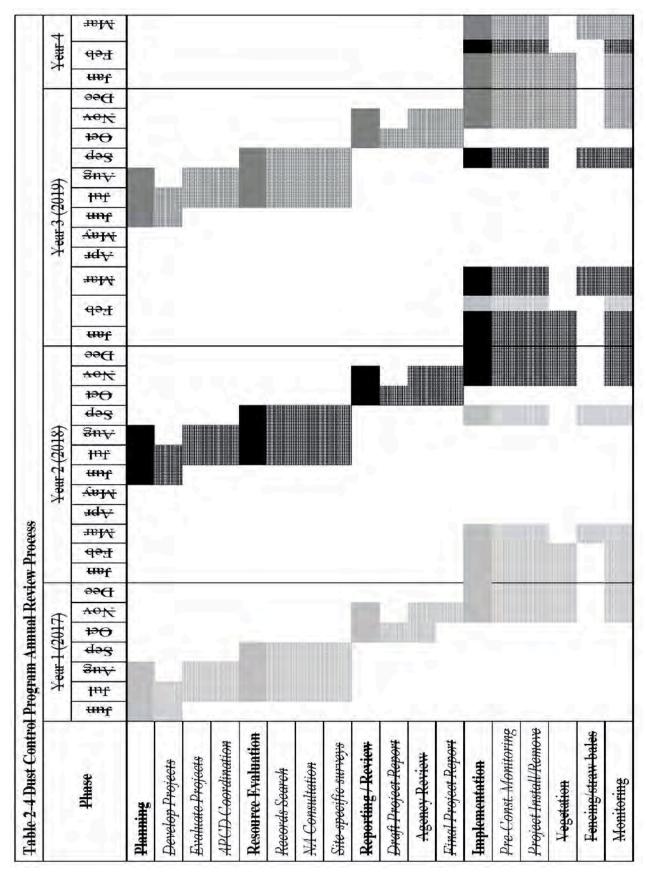
 Summarizes the status of all Dust Control Program-related activities (if data is available) performed the previous year (i.e., the 365 days before October 1), including:

- A description of the installation, maintenance, and decommissioning activities performed as part of the Dust Control Program; an analysis of whether measures incorporated into the planned activities to avoid or minimize the adverse impacts of the activities were effective and successful (i.e., avoided impacts); and a report on compliance with Master CDP and other applicable conditions / requirements (i.e., EIR mitigation measures)
- Describes the type, amount, and location of Dust Control Program-related activities the OHMVR Division would perform in the coming year (i.e., the 365 days after October 1), including:
  - Site specific-resources within work areas and potential impacts from installation, maintenance, and decommissioning
  - The measures incorporated into the planned activities to avoid or minimize the adverse impacts of the activities
  - An analysis of whether planned activities and their potential impacts are consistent with and within the scope of the Dust Control Program EIR, Master CDP, and other applicable regulatory conditions
- By November 15 of each year, the OHMVR shall, in coordination with the CCC, finalize the "Oceano Dunes SVRA Year-End Summary and Annual Work Plan," obtain approval from all necessary agencies, and proceed with the planned dust control activities
- Implementation: Starting November 16 of each year, the OHMVR Division shall proceed with the planned dust control activities.

The conceptual schedule for the Dust Control Program annual review process is shown in Table 2-4. The OHMVR Division would submit two annual work plans during the first year of project implementation to account for initial project start-up.

On Draft Program EIR page 2-33, Table 2-4 has been deleted (see following page):

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On pages 2-36 to 2-40 of the Draft Program EIR, the Standard and Specific Project Requirements pertaining to biological resources have been revised as follows:

# **Biological Resources (Chapter 7) Standard and Specific Project Requirements:**

- Minimize and/or Avoid Impacts to Special-Status Plants. The OHMVR Division would implement the following measures to minimize and/or avoid impacts to special-status plants:
  - o Prior to starting all work under the Dust Control Program, a qualified biologist shall survey for the presence of special-status plants in and within 100 feet of work areas (including new access routes). These surveys should be conducted prior to the commencement of Program activities, during the appropriate blooming period for species that are known to or have the potential to occur in work areas, and shall follow protocols established by the USFWS (USFWS 1996), CDFW (CDFG 2009), and CNPS (CNPS 2001), including the use of reference sites to confirm appropriate survey timing, if necessary.
  - o A qualified biologist shall map, flag, and protect special-status plants identified during surveys.
    - The qualified biologist shall establish clear avoidance areas around special status California and federal endangered or threatened plant locations. This avoidance area shall provide a minimum 25-foot buffer from all work activities (the biologist may establish a larger buffer if appropriate). Sturdy, visible fencing or other protective features shall be installed around all avoidance areas. Fencing shall be securely staked and installed in a manner that would be reasonably expected to withstand winds and sand transport levels typical of Oceano Dunes SVRA. Fencing and other protective features shall be removed upon completion of work activities.
    - If California or federal endangered or threatened plant species are observed in a work area or along an access path to a work area, the OHMVR Division shall prepare and submit a report detailing the find to the appropriate resource agency (i.e., USFWS, CDFW) prior to starting work. If a California or federal endangered or threatened plant species cannot be avoided during work activities, the USFWS and/or CDFW shall be consulted regarding the appropriate avoidance, minimization, and/or mitigation measures prior to conducting the work.
  - O Special-status plant species that are not California or federal listed shall be avoided to the extent feasible. If it is not feasible to avoid the loss of non-listed special-status plants that are not California or federal listed, the OHVMR OHMVR Division shall, if feasible, compensate for this loss by reseeding, replanting, and/or restoring the disturbed areas with locally collected seed stock from nearby plant locations.
- Qualified Biologist. A qualified biologist shall be an individual with a minimum
  of five years of academic training and professional experience in biological
  sciences and related resource management activities with a minimum of two
  seasonal years conducting surveys for special-status species that may be present

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- in the project area.
- Minimize and/or Avoid Impacts to Nesting and Special-Status Birds. The OHMVR Division would implement the following measures to minimize and/or avoid impacts to special-status birds:
  - Program implementation will avoid the avian breeding season (generally February 1 through September 15) to the extent feasible. If work occurs during the avian breeding season, Prior to starting all work under the Dust Control Program from February 1st to August 15th, a qualified biologist shall survey for nesting birds within the work area, along the access path to the work area, and in a sufficient area around the work area to identify nests that could be impacted by activities in the vicinity of work areas. These surveys shall be performed no more than seven (7) days prior to the start of work.
    - Identified active nests (i.e., a nest with eggs or chicks) shall be regularly surveyed by a qualified biologist for the first 24 hours prior to any Program-related activities to establish a behavioral baseline. Once work commences, all nests shall be regularly monitored to detect any behavioral changes as a result of the activities. If behavioral changes are observed, the work causing that change shall cease and USFWS and/or CDFW shall be consulted for additional avoidance and minimization measures. If regular monitoring of active nests by a qualified biologist is not feasible, the following measure shall be implemented.
    - If <u>active nests nesting birds</u> are found during surveys, the OHMVR Division shall establish a buffer zone around the nest until the <u>breeding season has ended</u>, or until a <u>qualified biologist has determined that young have fledged and are no longer reliant upon the nest or parental care for <u>survival</u>. The size of the buffer shall be determined by the qualified biologist, and shall depend on the species and topography, but would <u>generally be 250 feet around active non-listed small bird species nests and 500 feet around active non-listed raptor nests<del>generally be 300 feet for raptors and 50 feet for other bird species</del>. For the purposes of this measure only, non-listed shall refer to those species not listed under the federal or state Endangered Species Act and/or as state fully-protected species.</u></u>
  - O Prior to starting all work under the Dust Control Program in suitable burrowing owl habitat areas in the backdunes from September 1<sup>st</sup> through February 28<sup>th</sup>, a qualified biologist shall survey for potential burrows in the vicinity of the work area.
    - If small mammal burrows are detected, the biologist shall scan the area for burrowing owls and will search for signs of burrowing owls including feathers, whitewash, or pellets.
    - If any occupied burrows are detected, the OHMVR Division shall establish a minimum 100-foot buffer zone around the occupied burrow. A qualified biologist may increase the buffer area if it is determined that a larger buffer is necessary to reduce disturbance.
    - If no burrowing owls or signs of burrowing owls are detected, no further action is required.

The OHMVR Division has designed the project to avoid western snowy plover and California least tern habitat (generally flat, unvegetated, or sparsely vegetated sand near the shoreline); however, some activities may occur in the vicinity of these species. To the extent feasible, the OHMVR Division shall perform Dust Control Program work activities in the vicinity of western snowy plover and California least tern habitat from October 1 through February 28, which is outside of the nesting season for these species. If work activities must be conducted March 1 through September 30, the OHMVR Division would implement the following measures:

- No more than three days prior to starting work in the vicinity of western snowy plover and California least tern habitat from March 1<sup>st</sup> to September 30<sup>th</sup>, a qualified biologist shall survey for western snowy plover and California least tern nests. If nests are found during this survey, the OHMVR Division shall establish a minimum 300-foot buffer zone around the nest.
- If nesting activity is initiated within 300 feet of in-progress or installed project activities, the OHMVR Division shall stop all active work and install a additional fencing on the existing exclosure (i.e., large (200 foot diameter) fence bump-out) (if the nest it is near an existing exclosure) or install a circular single nest exclosure (200 foot diameter for snowy plovers and 330 foot diameter for least terns) (if the nest it is not near any existing exclosure.) The exclosure fence shall consisting of 2-inch by 4-inch mesh wire fencing with a height of 5 feet (8 inches buried) to protect the nest from people and predators. No additional dust control activities shall be performed within 300 feet of such exclosure until after the nest fate is determined.
- A biological monitor shall be available to monitor for the presence of nesting activity throughout the installation of all dust control measures. The on-site biological monitor shall have the authority to halt any action that might result in impacts to individual birds or nests. If work is stopped, the USFWS shall be notified immediately by the on-site biological monitor.
- O The OHMVR Division shall plan and design Dust Control Program activities to avoid changing breeding habitat in the vicinity of known or potential snowy plover and least tern nesting areas. Program activities that could facilitate predator movement into known or potential nesting areas for plover and tern shall be minimized. If avoidance is not feasible, additional predator control resources (e.g., enhanced monitoring and/or trapping) shall be secured to reduce predator presence and impacts to plover and tern adults, juveniles, chicks, and nests. In addition, if particular structures associated with the Program are confirmed to be used by avian predators for perching and contributing to western snowy plover or least tern predation, they will be removed and relocated immediately.
- o The OHMVR Division shall maintain 15 mile per hour vehicle speeds during all travel to and from dust control projects.
- Notification to the California Natural Diversity Database (CNDDB). If any listed, rare, or special-status species are detected during surveys or program

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activities, OHMVR Division shall submit notification to the CNDDB within 14 working days of the sightings.

On Draft Program EIR page 2-45, the following references have been added:

CDFW. 2009. Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Communities.

California Native Plant Society (CNPS). 2001. CNPS botanical survey guidelines. Pages 38-40 in California Native Plant Society's inventory of rare and endangered vascular plants of California (D.P. Tibor, editor). Sixth edition. Special Publication No. 1, California Native Plant Society, Sacramento, 387 pp.

U.S. Fish and Wildlife Service (USFWS). 1996. Guidelines for conducting and reporting botanical inventories for federally listed, proposed, and candidate plants. Sacramento, California. 2 pp.

## 3.4 RECREATION AND PUBLIC ACCESS (DRAFT PROGRAM EIR CHAPTER 4)

On Draft Program EIR page 4-11, the discussion of coastal-dependent development or use has been revised as follows:

The California Coastal Act defines "coastal-dependent development or use" to mean any development or use which requires a site on, or adjacent to, the sea to be able to function at all (PRC §30101). Thus, the OHMVR Division considers beach- and dune-oriented recreational opportunities to be coastal-dependent recreation activities. For the purposes of this EIR, coastal-dependent recreation activities at Pismo State Beach and Oceano Dunes SVRA could include:

- Non-vehicular recreational activities such as sand play, sun bathing, surf fishing, swimming (in the ocean), kite boarding and kayaking (in the ocean), marine wildlife viewing, and beach and coastal dune horseback riding
- Beach and coastal dune camping
- Beach and coastal dune vehicular recreation

Categorizing these activities as coastal-dependent would be appropriate because by the nature of their unit classification, Pismo State Beach and Oceano Dunes SVRA provide a unique place to enjoy OHV riding that is not available elsewhere; however, the CCC is the sole agency with primary jurisdiction over the Coastal Act and as such may or may not find the above activities to be coastal-dependent uses.

On pages 4-20 to 4-21 of the Draft Program EIR, the discussion of the thresholds of significance used to evaluate the significance of potential recreation impacts has been revised as follows:

In addition, the OHMVR Division has determined the project would have a significant environmental impact related to recreation and public access in the project area if it would:

• Substantially limit, reduce, or interfere with established coastal recreational opportunities at Oceano Dunes SVRA

The OHMVR Division arrived at the threshold of significance described above after conducting a search for CEQA thresholds of significance used by other CEQA lead agencies to consider and evaluate similar changes to recreational opportunities / recreation lands. This search revealed few thresholds of significance that were different

than those identified in Appendix G to the CEQA Guidelines, and none that set a bright line or numeric threshold for what was considered significant. Rather, in general, the significance of potential recreation impacts was based on variables like the potential to disrupt or interfere with recreation, and whether the lead agency felt the recreational resource being impacted, disrupted, interfered with, etc. was significant.

For example, the SLO County EIR prepared for the Phillips 66 Company Rail Spur Extension Project evaluated whether that project: 1) Would increase the use or demand for parks or other recreational opportunities; or 2) Affect the access to trails, parks, or other recreation opportunities (SLO County 2015). Similarly, the Santa Barbara County EIR prepared for the Goleta Beach 2.0 Project considered whether the project would "terminate or interfere with the established recreational uses of an area" and concluded that the potential conversion of approximately 2.6 acres of existing beach-front lawn area to dry sand or intertidal beach area was a significant and unavoidable impact of the project (Santa Barbara County 2014).

In addition, the OHMVR Division reviewed CCC agendas over an eight-year period (from January 2008 to March 2016) for potential development of a comparable nature that might contain potentially relevant staff recommendations or Commission determinations that could provide useful information and context for evaluating the significance of a change in recreational opportunities / recreational lands. None of these agenda items contained recommendations or decisions that identified a numeric threshold that CCC staff or the Commission itself used to evaluate potential recreational impacts. Rather, staff recommendations and Commission findings that a substantial issue exists (or not) with regard to recreation and public access policies and impacts was always contextualized by other factors related to recreation and access – such as the overall availability of recreational opportunities, regional importance of the resources, ability of the resources to provide low-cost recreational opportunities, consistency with the local LCP, etc. – and not the finite area or amount of recreational land being impacted. For example, in 2010, CCC staff found a substantial issue existed with the construction of an approximately 4,800 square-foot barn in a rural portion of SLO County because this development would remove an existing accessway in an area where recreational access opportunities are "extremely limited" (CCC 2010). In contrast, in 2011, the CCC found the closure of a 2.9-mile long portion of Coastal Drive in Redwood National Park would conform to California's Coastal Management Program because the closure took into account natural resource protection needs, and the closed area would remain available for public use and park-oriented recreation (CCC 2011). These CCC examples, which represent a minute sampling of CCC considerations, are not intended to imply or impart any finding regarding the proposed Program's consistency with the Coastal Act. Rather, these examples are only intended to highlight that the context in which a project occurs is an important factor that is considered and used by CCC staff and the Commission itself when reviewing a CDP application. According, the OHMVR Division's also considers context an important factor in evaluating the magnitude of the physical change to the recreation environment associated with the proposed Dust Control Program.

While the potential for the Dust Control Program to limit, reduce, and/or interfere with established recreational opportunities may be quantified in terms of potential acreage lost, visitors affected, etc., evaluating the effect of this potential change is largely a qualitative judgement. Specific individuals and agencies may react to changes in recreation

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conditions differently. Recreation impacts, therefore, depend, in part, on the specific stakeholder sensitivity to the type of recreational opportunity being affected.

In determining whether the Dust Control Program would substantially limit, reduce, or interfere with established recreational activities, the OHMVR Division has considered the following factors:

- The recreational history of Oceano Dunes SVRA
- The number of visitors that could be affected by a change in established recreational opportunities
- The extent to which changes to established recreational opportunities would be perceptible to visitors
- The ability of visitors to use similar facilities instead of Oceano Dunes SVRA
- The legislative mandate and mission of the OHMVR Division

The OHMVR Division considered the use of a specific value (e.g., 25 acres) to provide a numeric context for whether or not the potential change to established recreational opportunities is substantial; however, a single numeric value fails to account for the variety of factors that determine why, how, and where an individual chooses to recreate. Therefore, a numeric threshold of significance was not considered appropriate for the Dust Control Program.

On pages 4-24 to 4-25 of the Draft Program EIR, the discussion of, and specific requirements contained in, Mitigation Measure REC-1, have been revised as follows:

Given the SVRA's history, popularity, and unique, low-cost recreational opportunities, the OHMVR Division considers the temporary (43 acres annually) and permanent (up to 70 acres) closure of land inside the Oceano Dunes SVRA open riding and camping area to be a potentially significant impact on OHV recreation. To reduce the impact of the Dust Control Program on OHV recreation at Pismo State Beach and Oceano Dunes SVRA, the OHMVR Division would implement Mitigation Measure REC-1, Minimize Loss of Coastal Vehicular Recreation Opportunities

# Mitigation Measure REC-1: Minimize Loss of OHV Coastal Vehicular Recreation Opportunities

The OHMVR Division shall minimize the loss of OHV coastal vehicular recreational opportunities at Oceano Dunes SVRA by:

- Planting vegetation outside the Oceano Dunes SVRA open riding and camping area
- Planting vegetation and deploying seasonal dust control measures in a manner that does not interfere with the Oceano Dunes SVRA "Sand Highway" and other established paths of travel in the SVRA
- Deploying seasonal dust control measures from March  $1^{\rm st}$  through September  $30^{\rm th}$  only
- Considering potential hazards to public recreation from the seasonal deployment of dust control measures (e.g., ensuring that areas are safe for resumption of OHV recreation following removal of the project)

• Integrating recreation opportunities, including OHV recreation opportunities, into dust control measures. This could be achieved by:

- Educational kiosks that highlight the progression of dune vegetation / ecosystems
- Establishing and maintaining motorized and non-motorized trails through large, continuous blocks of planted vegetation
- o Embedding OHV training or vendor areas in dust control measures large enough to support such areas
- Identifying areas to provide additional camping or OHV recreation opportunity and diligently pursue opening those areas to OHV recreation with existing staff levels and funding considerations. Any such expansion shall occur in a manner that is consistent with the Public Resources Code and other applicable laws and regulations and shall not impede achievement of the performance standard set by Rule 1001.
  - The additional camping and/or OHV recreation opportunities to be pursued as part of this measure shall be, to the maximum extent feasible, similar to the type and amount of land affected as a result of the proposed Dust Control Program. Specifically, the OHMVR Division shall, if feasible, provide a 1:1 replacement of coastal vehicular recreation lands within the same regional geographic location as Oceano Dunes SVRA. For the purposes of this measure, inland OHV recreation opportunities are not considered similar to the opportunities provided by Oceano Dunes SVRA.
  - O The OHMVR Division shall actively research and attempt to identify feasible opportunities to provide additional camping and/or OHV recreation opportunities until three years after the completion of the proposed Dust Control Program, or 2025, whichever is later. If additional opportunities are not identified by this time, they shall be considered to not be available to the OHMVR Division.

Mitigation Measure REC-1 requires the OHMVR Division to implement measures that could reduce the potential for Dust Control Program components to limit and interfere with OHV recreation. Mitigation Measure REC-1 also directs the OHMVR Division to compensate for the loss (i.e., closure) of OHV recreation lands that could occur with implementation of the Dust Control Program; however, the ability of the OHMVR Division to do this is subject to other applicable laws and regulations and is, therefore, speculative. Furthermore, while technically feasible, the ability of the OHMVR Division to successfully identify, acquire, and develop potential additional camping and recreational opportunities in a timely manner is subject to certain factors outside the OHMVR Division's control. First, although the OHMVR Division has not completed an exhaustive evaluation of sites or areas inside or outside Oceano Dunes SVRA that could potentially offset the loss in camping or OHV recreation that could result from the proposed Program, it is worth noting: 1) Existing CDP 4-82-300 and the SVRA's General Development Plan, as amended, limit the areas where camping and OHV recreation can occur at Oceano Dunes SVRA and may need amending to allow for shifts in recreation distribution; 2) Most of the SVRA and adjacent coastal lands are within environmentally

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sensitive habitat area (ESHA), making expansion of the SVRA's open riding and camping area difficult; 3) No adjacent property owner has, to date, expressed interest in making land available to the State Parks system for the purposes of public recreational activity; and 4) If the OHMVR Division were to identify private lands for potential mitigation, their acquisition would likely be subject to detailed environmental review and require the appropriation of funds by the state legislature, which may or may not occur. The actual level of dust control measures to be installed at Oceano Dunes SVRA is unknown at this time, but would not reach maximum levels until approximately 2022 at the earliest. The OHMVR Division would initiate formal investigation of potential mitigation lands should the proposed Dust Control Program be approved, and several years would pass between the preparation of this EIR and the actual need for mitigation. In addition, since specific mitigation lands are not known at this time, it is not feasible for the OHMVR Division to speculate on the specific future conditions, standards, or guidelines that may or may not be relevant to acquisition and development of potential coastal recreational lands.

Mitigation Measure REC-1 outlines a reasonable plan for mitigating the proposed Dust Control Program's potential impacts to coastal vehicular recreation lands; however, as explained above, there are factors outside the OHMVR Division's control that may render the ability of the OHMVR Division to identify, acquire, and develop potential additional camping and recreational opportunities in a timely manner unsuccessful. Thus, even with the implementation of Mitigation Measure REC-1, the potential remains for the Dust Control Program (in Year 5) to temporarily (43 acres) and permanently (70 acres) limit and interfere with OHV coastal vehicular recreation at Oceano Dunes SVRA. Factors such as the SVRA's history of use, historical reduction in vehicle recreation lands in the area, current seasonal reduction in vehicle recreation lands, high visitor attendance levels, and the unique, low-cost nature of the coastal recreational opportunities provided by the SVRA make this loss of OHV lands a substantial and adverse change to OHV recreation at Oceano Dunes SVRA. Thus, Impact REC-1 would be a significant and unavoidable impact of the Dust Control Program. In addition, the proposed Dust Control Program would contribute to a significant and unavoidable cumulative impact on coastal vehicular recreation lands, as described in Chapter 11, Cumulative Impacts.

On Draft Program EIR page 4-28, the following references have been added:

- CCC 2010. Appeal Staff Report Substantial Issue and De Novo Hearing. A-3-SLO-06-043, SDS Family Trust. Santa Cruz, CA. July 2010.
- CCC 2011. Staff Recommendation on Consistency Determination. CD-045-11. San Francisco, CA. December 2011.
- Santa Barbara County 2014. Final Environmental Impact Report for the Goleta Beach
  County Park Managed Retreat Project 2.0. Santa Barbara, CA. March 2014. <a href="http://www.sbcountyplanning.org/projects/11DVP-00000-00016/FEIR.cfm">http://www.sbcountyplanning.org/projects/11DVP-00000-00016/FEIR.cfm</a>
- SLO County 2015. Phillips 66 Company Rail Spur Extension and Crude Unloading Project Final Environmental Impact Report and Vertical Coastal Access Project Assessment. Prepared for San Luis Obispo County. Prepared by Marine Research Specialists. San Luis Obispo, CA. December 2015.

#### 3.5 LAND USE AND PLANNING (DRAFT PROGRAM EIR CHAPTER 5)

On Draft Program EIR page 5-18, the first full sentence regarding the role of the CCC has been revised as follows:

The CCC is the sole agency with primary jurisdiction over the Coastal Act and as such is required to evaluate development projects for consistency with the Coastal Act. The CCC, when acting on the OHMVR Division's CDP application, may determine the Dust Control Program, as described in this EIR, is consistent with the Coastal Act and/or impose additional conditions on the Program as necessary to support its issuance of a CDP and the Program's conformance with the Coastal Act.

## 3.6 AESTHETICS (DRAFT PROGRAM EIR CHAPTER 6)

On Draft Program EIR page 6-33, the discussion of potential changes in the existing visual character and scenic qualities of Oceano Dunes SVRA and its surroundings as observed from public roads has been revised as follows:

As shown in Figure 6-21, Dust Control Program vegetation, wind fencing, and straw bales would not be visible from most public roadways in the vicinity of Oceano Dunes SVRA.

The OHMVR Division would install track-out prevention devices on or in the ground adjacent to entry and exit kiosks on West Grand Avenue in the City of Grover Beach and Pier Avenue in Oceano. This equipment would not degrade the existing visual character of Pismo State Beach or these public roadways because these are already developed areas and the new devices would blend in with the existing visual road setting.

Seasonal dust control measures could be slightly visible from small stretches and isolated points along US 101 (in the vicinity of Shell Beach), SR 1 (in the vicinity of Shell Beach and Oceano), and a few public roadways on the Nipomo Mesa (e.g., Hermosa Vista Way). In general, due to topography (see Figure 6-1 to Figure 6-3 and Figure 6-21), other vehicles, and/or intervening vegetation and buildings, only the portion of the seasonal dust control array installed on the highest dune crests would be visible, although some roadways on the Nipomo Mesa could also have views of seasonal dust control measures deployed in the very back of the dunes.

Based on a review of existing, publicly available aerial and street-level photography, the potential tree plantings would not significantly obstruct public views from SR 1. Vehicles travelling southbound on SR 1 in the vicinity of the proposed tree planting area would not view trees that could potentially be planted by the OHMVR Division because: 1) some of the proposed tree planting area is situated behind (west of) existing, large eucalyptus groves that already border SR1; 2) the part of southbound SR 1 that is not bordered by eucalyptus groves does not have a view of the ocean (rather, it has a view of the rail line adjacent to SR 1 and the Phillips 66 refinery, which are considered cultural modifications to the existing viewscape); and 3), SR 1 bends to the east, away from the proposed tree planting area (meaning southbound travelers would be facing away from proposed tree plantings). Vehicles travelling northbound on SR 1 near the proposed tree planting area would approach the tree planting area head-on in the vicinity of the Phillips 66 refinery (i.e., the trees could be directly in front of the traveler); however this stretch of SR 1 does not have ocean views, and eucalyptus trees are a common sight adjacent to the road. Past the Phillips 66 refinery, vehicles travelling northbound view the refinery, the rail line, and large groves of eucalyptus trees. Thus, due to existing topography and landforms,

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eucalyptus groves, and development between SR 1 and the proposed tree planting area, the OHMVR Division's proposed tree planting activities, if they occur, would not block or obstruct scenic views of the dunes or ocean from SR 1.

Travelers on public roadways in the vicinity of Oceano Dunes SVRA are not considered to be particularly sensitive viewers because they are surrounded by other vehicles and roadside developments. In addition, travelers on roadways would not be impacted for long durations or periods of time (because they would be travelling at speeds of approximately 25 to 50 miles per hour). For these reasons, the Oceano Dunes Dust Control Program would not constitute a substantial and adverse change to the visual character and quality of Oceano Dunes SVRA as observed from public roadways in the vicinity of the SVRA.

## 3.7 BIOLOGICAL RESOURCES (DRAFT PROGRAM EIR CHAPTER 7)

On Draft Program EIR page 7-3, the following language has been added to the end of Section 7.1.4 to address California Fish and Game Code Section 3513:

Section 3513 essentially overlaps with the MBTA, prohibiting the take or possession of any migratory non-game bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by CDFW.

On Draft Program EIR page 7-9, second paragraph, the last sentence has been revised as follows: Common plant species are described by habitat type in Section 6.2.1 7.2.1.

On Draft Program EIR page 7-14, the discussion of white-tailed kite has been revised as follows:

White-tailed kite has occasionally been observed in the Program area. Its continued <u>presencet</u> (foraging) is assumed in the Program area; however, no suitable nesting habitat exists within the Program area.

On Draft Program EIR page 7-14, the discussion of western snowy plover has been revised as follows:

The USFWS originally designated critical habitat for the Pacific coast population in 1999, but that designation was withdrawn pending the results of an economic analysis. The economic analysis led to the redesignation of critical habitat for the Pacific coast population in September 2005 (USFWS 2005). In June 2012, the USFWS issued a revised critical habitat designation (USFWS 2012). Overall, 39 new units, and 16,116 acres are being proposed that were not designated in 2005, for a total of 28,261 acres in 68 units in Washington, Oregon, and California. The proposed unit "CA 31 Pismo Beach/Nipomo Dunes" totals 1,652 acres, and includes the western portion of SLO County, including Pismo State Beach and Oceano Dunes SVRA. This critical habitat area extends approximately 1,300 1,100 feet inland from the Pismo State Beach western boundarymean high tide line, but does not overlap with the proposed Dust Control Program area.

On Draft Program EIR page 7-15, the discussion of California least tern has been revised as follows:

California least tern (*Sternula antillarum browni*), federal and state <u>endangered</u> threatened and a California Fully Protected species, is a colonial nesting seabird that historically nested along the Pacific coast from Baja California to Monterey Bay, California (USFWS 2006, Grinnell 1928). Loss of California least tern habitat to

development and recreation along with disturbance of nesting and feeding grounds has resulted in substantial declines in this subspecies following World War II (Atwood and Minsky 1983). From 1973 to 1975, the California breeding population was estimated at around 600 pairs (Bender 1974a, 1974b, Massey 1975). The subspecies *Sternula* antillarum browni has been designated as endangered under both CESA and FESA since 1976.

On Draft Program EIR Page 7-17 and 7-18, the Standard and Specific Project Requirements incorporated into the planning, design, and implementation of the Dust Control Program to avoid or minimize potential impacts to special-status plants have been revised as follows:

- Minimize and/or Avoid Impacts to Special-Status Plants. The OHMVR Division would implement the following measures to minimize and/or avoid impacts to special-status plants:
  - O Prior to starting all work under the Dust Control Program, a qualified biologist shall survey for the presence of special-status plants in and within 100 feet of work areas (including new access routes). These surveys should be conducted prior to the commencement of Program activities, during the appropriate blooming period for species that are known to or have the potential to occur in work areas, and shall follow protocols established by the USFWS (USFWS 1996), CDFW (CDFG 2009), and CNPS (CNPS 2001), including the use of reference sites to confirm appropriate survey timing, if necessary.
  - A qualified biologist shall map, flag, and protect special-status plants identified during surveys.
    - The qualified biologist shall establish clear avoidance areas around specialstatus California and federal endangered or threatened plant locations. This
      avoidance area shall provide a minimum 25-foot buffer from all work
      activities (the biologist may establish a larger buffer if appropriate). Sturdy,
      visible fencing or other protective features shall be installed around all
      avoidance areas. Fencing shall be securely staked and installed in a manner
      that would be reasonably expected to withstand winds and sand transport
      levels typical of Oceano Dunes SVRA. Fencing and other protective features
      shall be removed upon completion of work activities. If a California or federal
      endangered or threatened plant species cannot be avoided during work
      activities, the USFWS and/or CDFW shall be consulted regarding the
      appropriate avoidance, minimization, and/or mitigation measures prior to
      conducting the work.
    - If California or federal endangered or threatened plant species are observed during surveys, the OHMVR Division shall prepare and submit a report detailing the find to the appropriate resource agency (i.e., USFWS, CDFW) prior to starting work.
  - O Special-status plant species that are not California or federal listed shall be avoided to the extent feasible. If it is not feasible to avoid the loss of non-listed special-status plants that are not California or federal listed, the OHVMR OHMVR Division shall, if feasible, compensate for this loss by reseeding, replanting, and/or restoring the disturbed areas with locally collected seed stock from nearby plant locations.

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On Draft Program EIR page 7-18, the following Specific Project Requirement has been incorporated into the proposed Dust Control Program:

• Qualified Biologist. A qualified biologist shall be an individual with a minimum of five years of academic training and professional experience in biological sciences and related resource management activities with a minimum of two seasonal years conducting surveys for special-status species that may be present in the project area.

On Draft Program EIR page 7-19, the Standard and Specific Project Requirements incorporated into the planning, design, and implementation of the Dust Control Program to avoid or minimize potential impacts to nesting and special-status birds have been revised as follows:

- Minimize and/or Avoid Impacts to Nesting and Special-Status Birds. The OHMVR Division would implement the following measures to minimize and/or avoid impacts to special-status birds:
  - O Program implementation will avoid the avian breeding season (generally February 1 through September 15) to the extent feasible. If work occurs during the avian breeding season, Prior to starting all work under the Dust Control Program from February 1st to August 15th, a qualified biologist shall survey for nesting birds within the work area and in a sufficient area around the work area to identify nests that could be impacted by activities in the vicinity of work areas. These surveys shall be performed no more than seven (7) days prior to the start of work.
    - Identified active nests (i.e., a nest with eggs or chicks) shall be regularly surveyed by a qualified biologist for the first 24 hours prior to any Program related activities to establish a behavioral baseline. Once work commences, all nests shall be regularly monitored to detect any behavioral changes as a result of the Project. If behavioral changes are observed, the work causing that change shall cease and USFWS and/or CDFW shall be consulted for additional avoidance and minimization measures. If regular monitoring of active nests by a qualified biologist is not feasible, the following measure shall be implemented.
    - If <u>active nests nesting birds</u> are found during surveys, the OHMVR Division shall establish a buffer zone around the nest until the <u>breeding season has ended</u>, or until a qualified biologist has determined that young have fledged and are no longer reliant upon the nest or parental care for survival. The size of the buffer shall be determined by the qualified biologist, and shall depend on the species and topography, but would <u>generally be 250 feet around active non-listed small bird species nests and 500 feet around active non-listed raptor nestsgenerally be 300 feet for raptors and 50 feet for other bird species. For the purposes of this measure only, non-listed shall refer to those species not listed on the federal or state Endangered Species Act and/or as state fully-protected species.</u>
  - o Prior to starting all work under the Dust Control Program in suitable burrowing owl habitat areas in the backdunes from September 1<sup>st</sup> through February 28<sup>th</sup>, a qualified biologist shall survey for potential burrows in the vicinity of the work area.

 If small mammal burrows are detected, the biologist shall scan the area for burrowing owls and will search for signs of burrowing owls including feathers, whitewash, or pellets.

- If any occupied burrows are detected, the OHMVR Division shall establish a minimum 100-foot buffer zone around the occupied burrow. A qualified biologist may increase the buffer area if it is determined that a larger buffer is necessary to reduce disturbance.
- If no burrowing owls or signs of burrowing owls are detected, no further action is required.
- The OHMVR Division has designed the project to avoid western snowy plover and California least tern habitat (generally flat, unvegetated, or sparsely vegetated sand near the shoreline); however, some activities may occur in the vicinity of these species. To the extent feasible, the OHMVR Division shall perform Dust Control Program work activities in the vicinity of western snowy plover and California least tern habitat from October 1 through February 28, which is outside of the nesting season for these species. If work activities must be conducted March 1 through September 30, the OHMVR Division would implement the following measures:
  - No more than three days prior to starting work in the vicinity of western snowy plover and California least tern habitat from March 1<sup>st</sup> to September 30<sup>th</sup>, a qualified biologist shall survey for western snowy plover and California least tern nests. If nests are found during this survey, the OHMVR Division shall establish a minimum 300-foot buffer zone around the nest.
  - If nesting activity is initiated within 300 feet of in-progress or installed project activities, the OHMVR Division shall stop all active work and install a additional fencing on the existing exclosure (i.e., large (200-foot diameter) fence bump-out) (if the nest it is near an existing exclosure) or install a circular single nest exclosure (200-foot diameter for snowy plovers and 330-foot diameter for least terns) (if the nest it is not near any existing exclosure.) The exclosure fence shall consisting of 2-inch by 4-inch mesh wire fencing with a height of 5 feet (8 inches buried) to protect the nest from people and predators. No additional dust control activities shall be performed within 300 feet of such exclosure until after the nest fate is determined.
  - A biologist shall be available to monitor for the presence of nesting activity throughout the installation of all dust control measures. The on-site biological monitor shall have the authority to halt any action that might result in impacts to individual birds or nests. If work is stopped, the USFWS shall be notified immediately by the on-site biological monitor.
- O The OHMVR Division shall plan and design Dust Control Program activities to avoid changing breeding habitat in the vicinity of known or potential snowy plover and least tern nesting areas. Program activities that could facilitate predator movement into known or potential nesting areas for plover and tern shall be minimized. If avoidance is not feasible, additional predator control resources (e.g., enhanced monitoring and/or trapping) shall be secured to reduce predator presence and impacts to plover and tern adults, juveniles, chicks, and nests. In

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- addition, if particular structures associated with the Program are confirmed to be used by avian predators for perching and contributing to western snowy plover or least tern predation, they will be removed and relocated immediately.
- o The OHMVR Division shall maintain 15 mile per hour vehicle speeds during all travel to and from dust control projects.

On Draft Program EIR page 7-21, the following Standard Project Requirement has been added to the end of Section 7.3.2:

Notification to the California Natural Diversity Database (CNDDB). If any listed, rare, or special-status species are detected during surveys or program activities, OHMVR Division shall submit notification to the CNDDB within 14 working days of the sightings.

On Draft Program EIR page 7-22, the discussion under Impact BIO-1 has been revised as follows:

Work activities, in particular the deployment of temporary monitoring sites upwind, downwind, and adjacent to Dust Control Program vegetation, wind fencing, and straw bales, could slightly overlap vegetation islands and vegetated areas and result in the removal of a minor amount (less than 0.5 acres in the Program area) of common, native dune vegetation (e.g., silver dune lupine). In addition, planting activities in the potential tree planting area could result in trampling or removal of Nipomo Mesa lupine.

Non-native and exotic vegetation that may begin to grow in newly vegetated areas would primarily be removed using hand tools, but if necessary herbicide would be used. A Licensed Qualified Applicator with knowledge of native riparian plant species performs all chemical treatment for exotic species control at Oceano Dunes SVRA. Herbicides to control invasive species are applied consistently in accordance to the directions found on the product label and the Pest Control Advisor recommendation. Any herbicide that is sprayed within 100 feet of ponded water is approved for aquatic use (Rodeo or other approved herbicide). To prevent drift, no spraying occurs when wind speed is over five miles per hour. Herbicides are always stored, applied, and disposed of in accordance with label instructions, and in compliance with state and local laws. With these precautions, any potential use of herbicide during implementation of the Dust Control Program, or continued use after the term of the EIR, would not result in adverse environmental effects.

The OHMVR Division does not anticipate and is not proposing to impact listed special-status plant species. Standard and Specific Project Requirements incorporated into the Program include pre-work surveys for all special-status plants, flagging and protection for all special-status plants, establishment of 25-foot avoidance areas around all special-status plants, and restoration of disturbed, non-listed special-status plant areas. These requirements would be performed by a qualified biologist, and would render Impact BIO-1 less than significant.

On Draft Program EIR page 7-23, the discussion of nesting and special-status bird impacts has been revised as follows:

• Nesting and special-status birds may forage and/or breed throughout the Program area.

In general, nesting birds (excepting western snowy plover, and California least tern) would most likely be encountered in or near vegetated areas. In addition to the special-status birds that could breed in or near the project areas, many other common species of native birds also have the potential to breed in and near the Program area; all native birds and their nests are protected by the MBTA and the California Fish and Game Code.

Burrowing owls have been known to winter in Oceano Dunes SVRA, but have not been observed nesting in the Program area or other parts of Oceano Dunes SVRA (Iwanicha 2016). Burrowing owls occupy small mammal burrows, particularly ground squirrel burrows, year-round and not just during the breeding season. Such burrows are most likely to be present in the Program area in vegetation islands or in the eastern part of the Program area, in the Phillips 66 leasehold.

Planting vegetation within western snowy plover and California least tern breeding and/or wintering (snowy plover only) habitat would reduce available suitable western snowy plover and California least tern breeding and/or wintering habitat by decreasing the amount of open, wide sandy acreage. Previous studies have found that western snowy plovers and California least terns select habitats that are open (or wide) and have less vegetative cover in order to facilitate early detection of predators and reduce predation risk (Muir and Colwell 2010, Brindock and Colwell 2011, Patrick and Colwell 2014). Planting vegetation in suitable habitat for these species would reduce the open (or wide), sparsely vegetated acreages and could, thus, increase predation on adults, chicks, and/or eggs if western snowy plovers and California least terns are not able to detect predators moving towards the nest location. However, the OHMVR Division has designed Program activities to avoid western snowy plover critical habitat and active western snowy plover and California least tern nesting areas; therefore, this impact would be avoided.

Currently, western snowy plover and California least tern breed primarily breed directly west of the Program area. However, Iit is possible foraging, breeding, and/or roosting western snowy plover and California least tern, would be encountered in the western part of the Program area. Although unlikely, western snowy plovers could possibly be encountered throughout the Program area during foraging and wintering activities. California least terns forage over open water and do not winter in Oceano Dunes SVRA; therefore, impacts to California least tern would not occur during the winter or while foraging within the Program Area.

Although the OHMVR Division has developed the Dust Control Program area to avoid critical habitat and seasonal nesting exclosure areas, vegetation – and to a lesser degree wind fencing – that is planted on the western part of the Dust Control Program area could impact active nests by providing habitat for predators to hide and stalk nesting western snowy plovers and California least terns. In addition, protective perimeter fence posts, wind fencing, and some temporary dust and meteorological monitoring equipment would be tall and sturdy enough to provide perching habitat for common ravens, gull species, raptors, or other avian species that could prey on western snowy plover and/or California least tern nests; however, the OHMVR Division has operated the S1 meteorological tower approximately 350 feet west of Oceano Dunes SVRA's seasonal plover exclosure since the 2010/11 breeding season without documented incident of increased predation.

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Chemical soil stabilizers would solidify sand surfaces and could potentially prevent nesting; however, as mentioned previously the OHMVR Division has developed the Program area to avoid critical habitat and the seasonal nesting exclosure. Soil stabilizers, therefore, are not anticipated to impact nesting birds.

Given their listed status, impacts to California red-legged frog, western snowy plover, and California least-tern would likely be of the greatest magnitude; however, all impacts to special-status wildlife species and their habitat could be potentially significant. Standard and Specific Project Requirements incorporated into the Program include prework surveys for all special-status wildlife, removal of species from work areas, and avoidance of nesting birds, including a 300-foot buffer from nesting plovers and terns. In addition, the OHMVR Division is also incorporating requirements to avoid changing habitat in the vicinity of known or potential snowy plover and least tern nesting areas and to provide additional predator controls for projects that could facilitate predator movement and impacts to ployer and tern adults, juveniles, chicks, and nests. These requirements would be performed by a qualified biologist, and would render Impact BIO-2 less than significant. It is also noted that planting approximately 100 acres of native dune vegetation may provide new habitat for some special-status wildlife species, such as American badger and California red-legged frog, especially if most Dust Control Program vegetation is planted outside the SVRA's open riding and camping area, in the Phillips 66 leasehold.

On Draft Program EIR Page 7-27, the following references have been added:

Brindock, K.M. and M.A. Colwell. 2011. Habitat Selection by Western Snowy Plovers During the Nonbreeding Season. The Journal of Wildlife Management 75 (4): 786-793.

CDFW. 2009. Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Communities.

California Native Plant Society (CNPS). 2001. CNPS botanical survey guidelines. Pages 38-40 in California Native Plant Society's inventory of rare and endangered vascular plants of California (D.P. Tibor, editor). Sixth edition. Special Publication No. 1, California Native Plant Society, Sacramento, 387 pp.

Muir, J. J., and M. A. Colwell. 2010. Snowy Plover Select Open Habitats for Courtship Scrapes and Nests. The Condor 112:507–510.

Patrick, A.M. and M.A. Colwell. 2014. Snowy Plovers Select Wide Beaches for Nesting. Wader Study Group Bulletin 121(2): 17-20.

<u>U.S. Fish and Wildlife Service (USFWS)</u>. 1996. Guidelines for conducting and reporting botanical inventories for federally listed, proposed, and candidate plants. Sacramento, California. 2 pp.

## 3.8 ALTERNATIVES (DRAFT PROGRAM EIR CHAPTER 12)

On Draft Program EIR pages 12-5 to 12-7, the discussion of the Reduced OHV Use Area Alternative (Draft Program EIR Section 12.2.3 has been revised as follows:

#### 12.2.3 Reduced OHV Use Area

Under this alternative, the OHMVR Division would voluntarily implement restrictions on the acreage within Oceano Dunes SVRA open to vehicular recreation (but would not reduce existing camping or visitor limits). These restrictions could either be in lieu of, or in

addition to, the vegetation and seasonal dust control measures proposed under the Dust Control Program, and could be short-term (e.g., hourly restrictions during high wind days), intermediate (weekly or monthly restrictions), or long-term (e.g., seasonal or longer duration restrictions) in nature. The OHMVR Division notes that this alternative has not been scientifically proven to be more effective at reducing saltation and associated dust production at Oceano Dunes SVRA than the proposed Dust Control Program Activities. The OHMVR Division notes it has not tested this alternative at Oceano Dunes SVRA. Therefore, it is not known how effective OHV use restrictions would be at reducing saltation and associated dust production. OHV use restrictions would not directly cover the ground surface, break the flow of wind across the landscape, or otherwise stabilize or hold sand in place. Accordingly, OHV use restrictions are not likely to be as effective as vegetation (up 90 -99 percent effective once established) or wind fencing and straw bales (40 – 70 percent effective) at reducing sand transport and controlling and minimizing dust emissions. The OHMVR Division also notes that there is uncertainty over the location of the restrictions considered under this alternative; however, for the purposes of this EIR's analysis, OHV use restrictions would, at a minimum, be in effect for the part of the proposed Dust Control Program area where OHV recreation is allowed (approximately 425 acres). At maximum, OHV use restrictions would be enforced throughout all areas of Pismo State Beach and Oceano Dunes SVRA where OHV recreation is allowed (approximately 1,450 acres; see Table 4-6). Park access and visitor limits, street-legal vehicle access, camping activities, and non-vehicular recreation activities would not be restricted under this alternative.

#### 12.2.3.1 OHV Use Restrictions in-Lieu of Dust Control Program Measures

Under this alternative, instead of occupying open sand areas with vegetation and seasonal dust control measures, the OHMVR Division would restrict the use of OHVs on a short, intermediate, or long-term basis. close an equivalent area (143 acres) to all OHV recreation. In addition, the OHMVR Division would still proceed with the installation of track-out prevention devices at entrance kiosks on Grand Avenue in Grover Beach and Pier Avenue in Oceano.

OHV use restrictions on a short-term basis may or may not reduce the proposed Dust Control Program's significant recreation impact. Short-term restrictions would not be in place 24-hours per day (as vegetation and wind fencing would be) and, therefore, would not completely remove an area from OHV recreation for an extended period of time. In addition, if the restrictions were implemented during high wind events (particularly during mid-week periods) when visitation and vehicular recreation on the dunes is generally at its lowest level, such restrictions may only affect a small number of people. Conversely, a weekend closure during a holiday period, or a high number of short-term closures, could impact a greater number of visitors than the proposed Program, albeit on a shorter term than the proposed Program. Short-term OHV use restrictions would not result in the seasonal and/or permanent loss of coastal vehicular recreation lands (which would occur with the proposed fencing and vegetation plantings). Therefore, would likely reduce and possibly avoid the proposed Program's significant land use impact, although it is noted that certain day users would be denied their coastal vehicular recreation opportunity if they visit the park on a high wind day. In addition, short-term OHV use restrictions would not reduce the proposed Program's potentially significant noise impact. Finally, although unlikely, short-term OHV use restrictions in-lieu of vegetation and seasonal dust control

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measures might obtain most of the basic objectives of the proposed Program. While short-term OHV restrictions would not directly control and minimize saltation-generated dust and PM produced during strong persistent winds, they would, in a broad sense, maintain existing coastal OHV recreational opportunities as part of a balanced, comprehensive dust control program. But as noted, this alternative has not been tested and therefore, it is uncertain whether OHV use restrictions would make ongoing and/or best possible progress towards compliance with Rule 1001.

OHV use restrictions on an intermediate or long-term basis would not reduce the proposed Program's significant recreation impact. This is because such restrictions would at minimum, affect a larger area (up to approximately 1,450 acres of restrictions versus 143 acres of vegetation and seasonal dust control measures), for a longer, continuous period of time (e.g., weeks, months, seasons). Similarly, intermediate- or long-term or long-term OHV use restrictions would not reduce the proposed Program's significant land use impact because such restrictions would continue to result in the seasonal and/or long-term closure of coastal vehicular recreation land and thus would not perpetuate and enhance recreational use of OHVs at Oceano Dunes SVRA. In addition, because this alternative would not affect visitation, park access, and non-vehicular recreation activities, it would not avoid or substantially lessen the proposed Program's potentially significant noise impacts from track-out control.

OHV use restrictions in-lieu of the proposed vegetation and seasonal dust control measures would not avoid or substantially lessen the proposed Dust Control Program's significant recreation impact because, at a minimum, it would result in more loss of coastal vehicular recreation lands (143 acres) than the proposed Dust Control Program. In addition, because OHV use restrictions would not directly cover the ground surface, break the flow of wind across the landscape, or otherwise stabilize or hold sand in place, it is reasonable to presume that OHV use restrictions would not be as effective as vegetation (up 90 -99 percent effective once established) or wind fencing and straw bales (40 - 70 percent effective) at reducing sand transport and controlling and minimizing dust emissions. Therefore, in order to achieve the same level of effectiveness as the proposed Dust Control Program, OHV use restrictions could be required on a much larger area at Oceano Dunes SVRA, resulting in a greater loss of OHV recreation lands than the proposed Dust Control Program. Although the exact amount of acreage is uncertain, if it was found to be substantial enough (e.g., hundreds of acres), to increase vehicle density in the remaining open riding and camping area to an unsafe level, such a closure may lead to a reduction in the amount of OHV vehicles allowed at Oceano Dunes SVRA at any one time.

Thus, OHV use restrictions in-lieu of the proposed vegetation planting and seasonal dust control measures would not maximize the preservation of low-cost, coastal OHV recreation opportunities, and could result in a lower public safety benefit than the proposed Dust Control Program. Therefore, this alternative would be inconsistent with the Pismo State Beach and Pismo Dunes SVRA General Development and Resource Management Plan and the California Coastal Act, which both contain policies intended to provide maximum access and recreational opportunities consistent with visitor and public safety needs. This alternative would also be inconsistent with the OHMVR Division's legislative mandate. With passage of the

OHV Recreation Act of 2003, it was the intent of the legislature that existing OHV recreation areas, facilities, and opportunities should be expanded and managed in a manner consistent with Chapter 1.25 of the Public Resources Code, in particular to maintain sustained, long term use of recreational opportunities. Public Resources Code Chapter 1.25 sets forth that the protection of public safety, the appropriate utilization of lands, and the conservation of land resources are the highest priority for the OHMVR Division in its management of an SVRA. Public Resources Code Chapter 1.25 also sets forth that SVRAs shall be managed and operated for the purpose of making the fullest public use of the outdoor recreational opportunities present, and that the natural and cultural elements of the environment may be managed or modified to enhance the recreational experience (PRC §5090.43) consistent with the requirements of Public Resources Code Section 5090.35. Vehicle restrictions that do not maximize recreational activities consistent with public safety and environmental protection needs would change the context of the Program and its compatibility with the applicable plans and policies, resulting in a significant land use impact.

Finally, OHV use restrictions (of any duration) in-lieu of vegetation and seasonal dust control measures would not obtain be unlikely to obtain most of the basic objectives of the Program. As described above, OHV useSuch restrictions would not directly control and minimize saltation-generated dust and PM produced during strong persistent winds or maintain existing coastal OHV recreational opportunities, and it is uncertain whether such restrictions would make ongoing and/or best possible progress towards compliance with Rule 1001. es be as effective at controlling and minimizing dust emissions during strong, persistent winds, would not be as effective at improving downwind air quality, would slow progress towards compliance with the SLOAPCD Rule 1001 performance standard, and would not maintain existing coastal recreation opportunities at Oceano Dunes SVRA to the maximum extent feasible and consistent with legislative mandates. This alternative also may not maintain existing visitor levels if the in-lieu closure of lands led to public safety concerns due to increased vehicle density in the open riding and camping area.

Accordingly, the OHMVR Division has rejected this alternative because it would not be unlikely to obtain most of the basic objectives of the proposed Dust Control Program norand would not avoid or substantially lessen the proposed Program's significant and unavoidable impacts (rather it would substantially increase the severity of these impacts).

#### 12.2.3.2 OHV Use Restrictions in Addition to Dust Control Program Measures

Under this alternative, the OHMVR Division would implement the proposed Dust Control Program (approximately 100 acres of vegetation and 40 acres of seasonal dust control measures) and implement OHV use restrictions close additional acreage to motorized recreation. As described above (see Section 12.2.3.1), there is uncertainty over the level, timing, duration, and efficacy of such restrictions, vehicular use restrictions which have not been tested at Oceano Dunes SVRA are not scientifically proven to be effective at reducing saltation and dust production and, therefore, may not provide additional dust control above that provided by the proposed Dust Control Program.

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This alternative would increase the magnitude of the proposed Dust Control Program's significant and unavoidable recreation and land use impacts because it would result in the additional closure of coastal vehicular recreation lands.

This alternative would achieve most of the basic objectives of the proposed Dust Control Program because it would still involve planting vegetation (approximately 100 acres) and deploying seasonal dust control measures (approximately 40 acres) that are effective at minimizing dust and PM10 emissions during wind events; however, this alternative would not maintain existing coastal recreation opportunities provided by Oceano Dunes SVRA. In addition, this alternative may not maintain existing visitor levels if the in-lieu closure of lands led to public safety concerns due to increased vehicle density in the open riding and camping area.

While this alternative would obtain most of the objectives of the proposed Dust Control Program, the OHMVR Division has rejected this alternative because it clearly would not reduce or substantially lessen the significant recreation and land use impacts of the Program; rather, it would increase the severity of these impacts by resulting in the additional closure of coastal vehicular recreation lands at Oceano Dunes SVRA.

On Draft Program EIR page 12-10, the discussion of the No Comprehensive Dust Program Alternative's ability to obtain Program objectives has been revised as follows:

The No Comprehensive Dust Program Alternative would obtain most some of the basic objectives of the Dust Control Program to a certain degree. Deploying approximately 40 acres of seasonal dust control measures would control and minimize dust emissions during strong winds; however, it is uncertain whether this level of activity would reduce concentrations of PM10 as measured at the SLOAPCD's CDF air quality monitoring station and thus make progress towards compliance with the Rule 1001 performance standard. The No Comprehensive Dust Program Alternative would maintain existing public access routes and coastal recreation opportunities; however, it would not result in the development of a comprehensive dust control Program, including the deployment of temporary monitoring equipment and the installation and operation of a track-out prevention device at the Grand Avenue and Pier Avenue sand ramps.

On Draft Program EIR page 12-11, the discussion of the alternate dust control program alternative has been revised as follows:

The alternate dust control program could also result in direct and/or indirect impacts on biological resources because the emphasis on planting vegetation in near-shore areas would likely modify, to some degree, USFWS-designated critical habitat for the western snowy plover (federal-listed as threatened). Planting vegetation in this critical habitat area could impact active nests by providing habitat for predators to hide and stalk nesting western snowy plovers and California least terns (federal- and state-listed as endangeredthreatened).

On Draft Program EIR page 12-12, existing Section 12.5 has been replaced with a new discussion of artificial wind breaks as an alternative to the proposed Dust Control Program and re-structured to be Section 12.6 as follows:

## 12.5 Environmentally Superior Alternative Artificial Windbreaks

Under this alternative, the OHMVR Division would use artificial windbreaks as a potential dust control measure. These windbreaks would consist of industrial dust control products, the design of which typically involves a fine mesh screen stretched laterally across a grid or array of cables and /or poles installed directly into the ground approximately every 100 feet; however, heavy-duty applications can consist of concrete foundations, more closely-spaced steel lattice towers, and steel windbreak panels. These systems are usually designed to be between 50- to 100-feet high, and could be installed at or immediately downwind of Pismo State Beach and Oceano Dunes SVRA, on public and/or private lands. The artificial windbreaks could either be in-lieu of, or in addition to, the vegetation and seasonal dust control measures proposed as part of the proposed Dust Control Program. Given the level of effort needed to design and install such systems (e.g., engineering design and use of heavy equipment for pole installation and/or foundation construction), artificial windbreaks are considered a permanent form of dust control. Usually, industrial windbreaks are designed as a single row that runs the length or perimeter of a facility or control area; due to their height and foundation requirements, they are not a dense array similar to wind fencing. For the purposes of this EIR's analysis, it is presumed that each individual artificial wind break would need to be several hundred feet long to be viable, and would range between a minimum of approximately 0.75 miles (3,960 feet) to a maximum of 1.5 miles (7,920 feet) in total length (the approximate perimeter and vertical distance of the proposed Dust Control Program area).

#### 12.5.1 Artificial Windbreaks in-Lieu of Dust Control Program Measures

Artificial windbreaks would likely avoid the proposed Dust Control Program's significant recreation impacts because these structures are usually installed at the edge or perimeter of the area being controlled, which in the case of the Dust Control Program, would be outside the open riding and camping area. This alternative could also lessen the proposed Program's land use impacts since recreation impacts would be avoided; however, 50-foot high artificial wind breaks on private lands would exceed the height limitations set by SLO County Coastal Zone Land Use Ordinance (Section 23.04.124). In addition, artificial windbreaks are likely not consistent with the Coastal Act's provisions protecting visual resources, as windbreaks would result in a new, significant and unavoidable aesthetic impact. Although the color of heavy industrial wind breaks can be customized. 0.75 mile-long, permanent, 50 to 100-foot tall steel structure would be an unprecedented development at Oceano Dunes SVRA that would be visible from most, if not all, sensitive receptor locations within Oceano Dunes SVRA, as well as some points up and down the coast, and along some public roadways. In addition, such structures are likely to trap and collect debris and refuse. Windbreaks would also result in substantially more severe impacts on biological resources and, potentially, geology and soils, due to grading and installation of poles and/or foundations that, presumably, would need to be installed and anchored deep into the ground to be stable and withstand shifting sand conditions. A perimeter wind break would provide substantial perching opportunities for birds of prey, could trap and/or otherwise harm birds that collide with or are blown into the structure, including western snowy ployers and California least terns, and could pose a barrier to wildlife movement from the back dunes area to mid-dune and near shore areas, although a gap is typically provided between the ground and the bottom of the wind break. Furthermore, a perimeter wind break may cause deposition of particles immediately

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downwind in the dune lakes region, which could impact water quality and require maintenance or removal of sand deposited both upwind and downwind of the windbreak.

Artificial windbreaks would not control and minimize saltation-generated dust and PM, but would likely reduce concentrations of PM10 measured at the CDF air quality station and make progress towards compliance with the Rule 1001 performance standard. Artificial windbreaks would also maintain existing public access routes and coastal recreation opportunities, but would not be a comprehensive dust control program that balances cultural, natural, and recreation resources (a single industrial dust control solution is not considered a comprehensive approach that involves vegetation and seasonal dust control measures in a manner that balances park resources). This alternative would achieve the proposed Program's monitoring and ongoing dust control objectives, but would not achieve the proposed Program's track-out control objective.

#### 12.5.2 Artificial Windbreaks in Addition to Dust Control Program Measures

Under this alternative, the OHMVR Division would implement the proposed Dust Control Program and proceed with the installation of industrial wind breaks. The installation of industrial wind breaks could reduce the amount of dust control measures implemented under the proposed Program; however, given windbreaks would be a permanent form of dust control, the OHMVR Division would likely install windbreaks towards the end of the five-year dust control program. This would provide the time and information necessary to further develop scientific information that supports the placement of a windbreak in a permanent location.

Artificial windbreaks in addition to the proposed vegetation and seasonal dust control measures would not avoid or substantially lessen any of the proposed Dust Control Program's impacts. The OHMVR Division would still deploy seasonal dust control measures and proceed with planting vegetation while permanent sites for industrial windbreaks are evaluated and identified. In addition, as explained in Section 12.5.1, once installed, industrial windbreaks could increase the magnitude of the proposed Program's land use impacts, and would result in a new significant and unavoidable aesthetic impact, as well as result in potentially significant impacts on biological resources, geology and soils, and hydrology and water quality. This alternative would obtain all the objectives for the proposed Dust Control Program, because it would still involve planting vegetation and deploying seasonal dust control measures that are effective at minimizing dust and PM10 emissions during wind events.

## 12.6 Environmentally Superior Alternative

A comparison of the proposed Program against the <u>five</u>three alternatives discussed in detail above is presented in Table 12-2.

Table 12-2 Comparison of Proposed Program Impacts against Program Alternatives						
		No Project Alternatives		Project Alternatives		
Resource	Proposed Program	No Action	No Comprehensive Dust Program	Alternate Dust Control Program	Artificial Windbreaks (In-Lieu)	Artificial Windbreaks (In-Addition)
Aesthetics	LTS	Lessened	Lessened	Substantially More Severe PS/SU	Substantially More Severe / SU	Substantially More Severe / SU
Agriculture	No Impact	Same	Same	Same	<u>Same</u>	<u>Same</u>
Air Quality	Benefit	Benefit Lessened	Benefit Lessened	Same or Increased Benefit	Benefit Lessened	Same or Increased Benefit
Biology	LTS	Lessened	Lessened	More Severe / PS/ <u>or</u> SU	Substantially More Severe / PS or SU	Substantially More Severe / PS or SU
Cultural	LTS	Lessened	Lessened	Same	Same	Same
Geology	LTS	Lessened	Lessened	Same	More Severe / PS	More Severe / PS
GHG	LTS	Lessened	Lessened	Same	Same	Same
Hazards	LTS	Lessened	Lessened	Same	<u>Same</u>	<u>Same</u>
Hydrology	LTS	Lessened	Lessened	Same	More Severe / PS	More Severe / PS
Land Use	SU	Avoided / LTS	Substantially Reduced/LTS	Substantially More Severe / SU	Potentially Lessened / PS	Potentially More Severe / SU
Minerals	No Impact	Same	Same	Same	Same	Same
Noise	LTSM	Lessened	Avoided	Same	<u>Same</u>	<u>Same</u>
Public Services	No Impact	Same	Same	Same	<u>Same</u>	Same
Recreation	SU	Avoided / LTS	Substantially Reduced / PS or SU	Substantially More Severe / SU	Avoided / LTS	<u>Same</u>
Traffic	LTS	Lessened	Lessened	Same	<u>Same</u>	<u>Same</u>
Utilities	No Impact	Same	Same	Same	<u>Same</u>	<u>Same</u>
Meets Project Objectives?	All	Few	Some	Most	Most	<u>All</u>

Table Legend: LTS = Less than significant impact; LTSM = Less than significant impact with mitigation; PS = Potentially significant impact: SU = Significant and unavoidable impact

As shown in Table 12-2, the No Action Alternative is the least environmentally damaging alternative because it avoids or lessens many of the impacts that would occur with implementation of the Oceano Dunes SVRA Dust Control Program; however, it only achieves a few of the objectives for the proposed Program. Similarly, the No Comprehensive Dust Control Program would avoid, substantially reduce, or lessen most of the impacts that would occur with the proposed Program. But it, too, only achieves some of the objectives for the proposed Program. The alternate dust control program would obtain most of the proposed Program's objectives, but would also result in substantially more severe aesthetics and recreation impacts and substantially more severe impacts on biological resources. The artificial windbreak in-lieu of the proposed Program alternative would avoid some of the proposed Program's significant environmental impacts and

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achieve most of the proposed Program's objectives, but would result in greater overall environmental effects. The artificial windbreak in addition to the proposed Program alternative would obtain all of the objectives set for the proposed Program, but would not avoid the proposed Program's significant environmental impacts and would add a significant, unavoidable impact (aesthetics). As a result, the proposed Program is considered the environmentally superior alternative.

## 3.9 OTHER CEQA CONSIDERATIONS (DRAFT PROGRAM EIR CHAPTER 13)

On Draft Program EIR page 13-1, the following text describing the potentially unavoidable significant impacts of the proposed Dust Control Program has been revised as follows:

All potentially significant impacts of the project are identified in Chapters 4 – 11 of this EIR, along with Standard and Specific Project Requirements (SPRs) and, where necessary, mitigation measures, to reduce or avoid these impacts. Even with the incorporation of SPRs and feasible mitigation measures, the proposed Dust Control Program, if implemented, would result in twothree unavoidable, significant impacts:

On Draft Program EIR pages 13-1 to 13-2, the following text describing the significant and unavoidable impacts of the proposed Dust Control Program have been revised as follows:

# Impact REC-1: The Dust Control Program would limit and interfere with coastal vehicular recreation opportunities at Oceano Dunes SVRA.

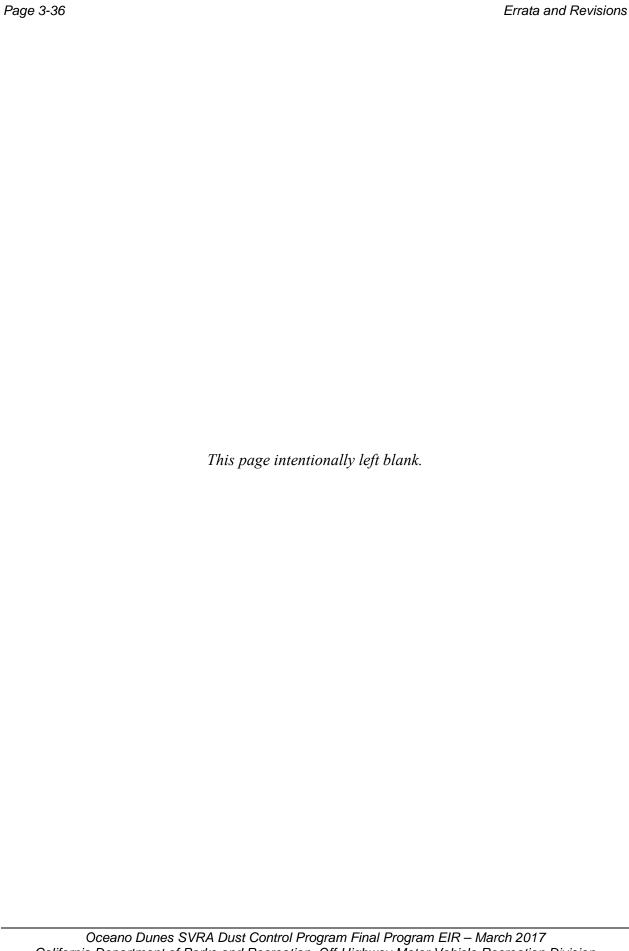
Dust Control Program activities could result in the temporary (up to 43 acres) and permanent (between 35 and 70 acres) closure of land inside the Oceano Dunes SVRA open riding and camping area (in Year 5), which would constitute an approximately 5.3 to 7.7 percent loss in OHV recreation lands at Oceano Dunes SVRA (out of 1,453 acres). Mitigation Measure REC-1 requires the OHMVR Division to minimize the loss of OHV coastal vehicular recreation opportunities at Oceano Dunes SVRA by planting vegetation outside the SVRA's open riding and camping area as much as feasible, planting vegetation and deploying seasonal dust control measures in a manner that does not interfere with Sand Highway and other established paths of travel, integrating recreation opportunities (including OHV recreation) into dust control measures, and identifying areas to add camping and OHV recreation opportunities. Any expansion of OHV recreation opportunities shall occur in a manner that is consistent with the Public Resources Code and other applicable laws and regulations and shall not impede achievement of the performance standard set by Rule 1001. Mitigation Measure REC-1 could minimize some of the loss in coastal vehicular recreational opportunities at Oceano Dunes SVRA that would occur under the Dust Control Program; however, the potential would remain for the Dust Control Program (in Year 5) to temporarily (43 acres) and permanently (70 acres) limit and interfere with OHV coastal vehicular recreation at Oceano Dunes SVRA. Factors such as the SVRA's history of use, historical reduction in vehicle recreation lands in the area, current seasonal reduction in vehicle recreation lands, high visitor attendance levels, and the unique, low-cost nature of the coastal recreational opportunities provided by the SVRA make this loss of OHV coastal vehicular lands a substantial and adverse change to OHV recreation at Oceano Dunes SVRA, and a significant and unavoidable impact of the Dust Control Program.

Impact LUP-1: The Dust Control Program would conflict with the Pismo Dunes SVRA (now Oceano Dunes SVRA) General Development Plan and Resource Management Plan.

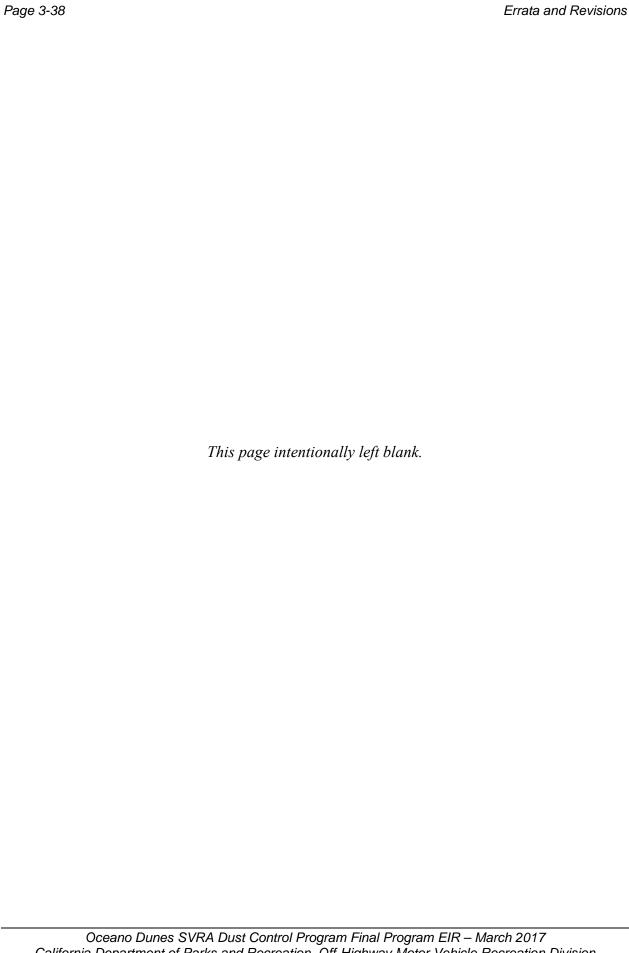
Impact LUP-1 identifies that the loss of up to approximately 78 to 113 acres of land inside the Oceano Dunes SVRA is considered a significant and unavoidable recreational impact that would also not be consistenteenflict with the Oceano Dunes SVRA General Development Plan and Resource Management Plan because it would not perpetuate and enhance recreational use of OHVs in the SVRA. Mitigation Measure REC-1 requires the OHMVR Division to implement measures that could reduce the potential for Dust Control Program components to limit and interfere with OHV recreation. Mitigation Measure REC-1 also directs the OHMVR Division to compensate for the loss (i.e., closure) of OHV recreation lands that could occur with implementation of the Dust Control Program; however, the ability of the OHMVR to do this is subject to other applicable laws and regulations and is, therefore, speculative. Thus, even with the implementation of Mitigation Measure REC-1, the potential remains for the Dust Control Program (in Year 5) to temporarily (43 acres) and permanently (70 acres) limit and interfere with OHV recreation at Oceano Dunes SVRA. This loss is considered a significant conflict with the stated management policy of the General Development Plan and Resource Management Plan. Thus, Impact LUP-1 would be a significant and unavoidable impact of the proposed Dust Control Program.

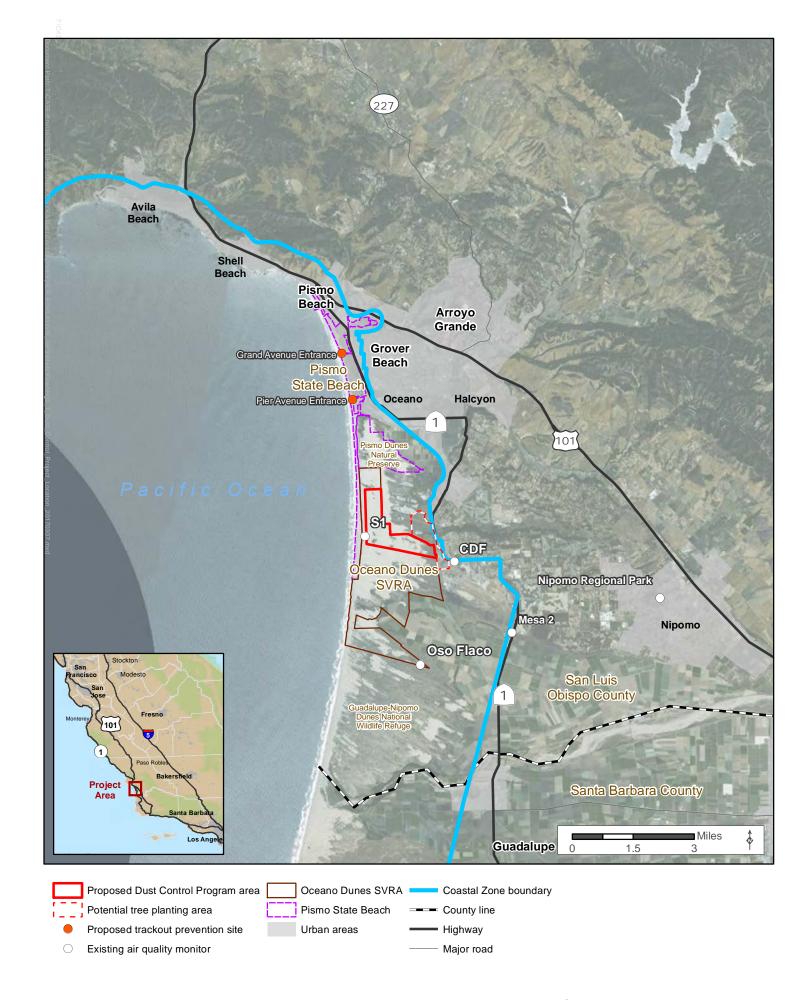
## Impact LUP-2: The Dust Control Program could conflict with the California Coastal Act.

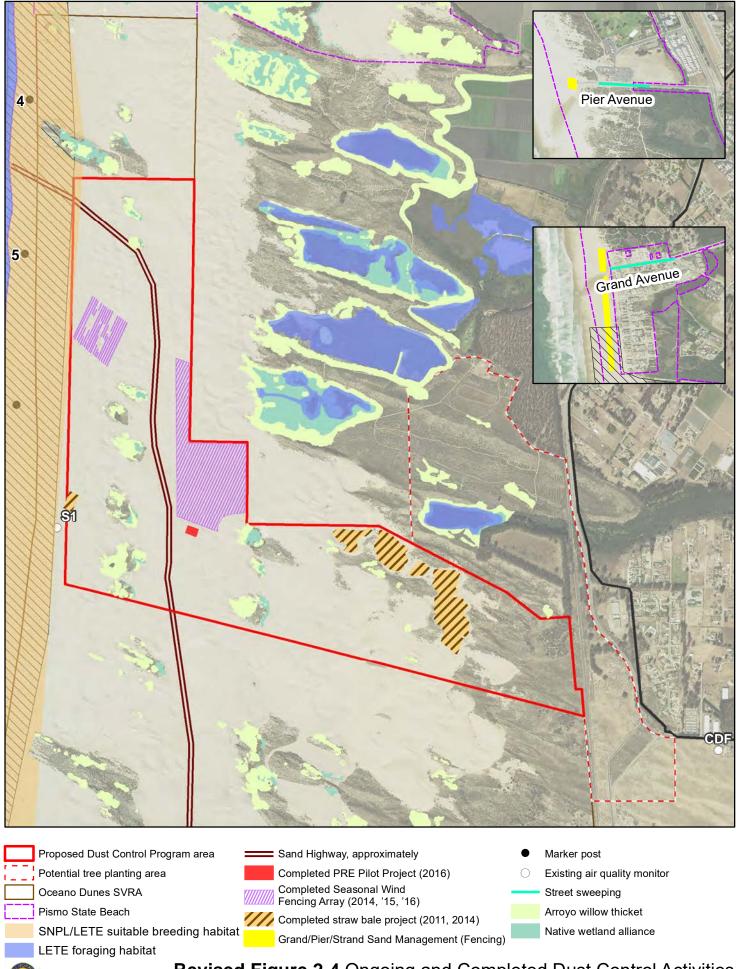
Impact LUP-2 identifies the proposed Dust Control Program could conflict with the California Coastal Act because the preferred Dust Control Program scenario would impact 78 acres of coastal OHV recreation lands and the alternate program scenario does not maximize existing, historical, and traditional coastal OHV recreational opportunities at Oceano Dunes SVRA. This significant impact would occur even with design and mitigation measures (REC-1) incorporated into the project. Thus, impact LUP-2 would be a significant and unavoidable impact of the proposed Dust Control Program. It is noted the CCC is the sole agency with primary jurisdiction over the Coastal Act and as such is required to evaluate development projects for consistency with the Coastal Act. The CCC, when acting on the OHMVR Division's CDP application, may determine the Dust Control Program, as described in this EIR, is consistent with the Coastal Act and/or impose additional conditions on the Program as necessary to support its issuance of a CDP and the Program's conformance with the Coastal Act.



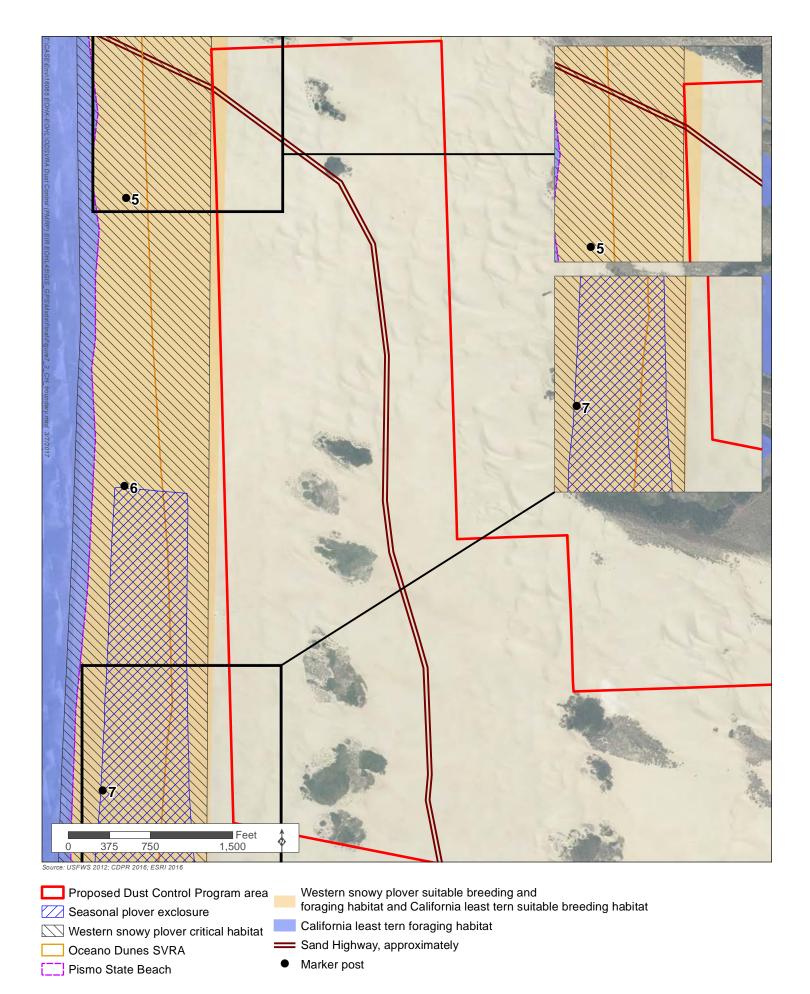






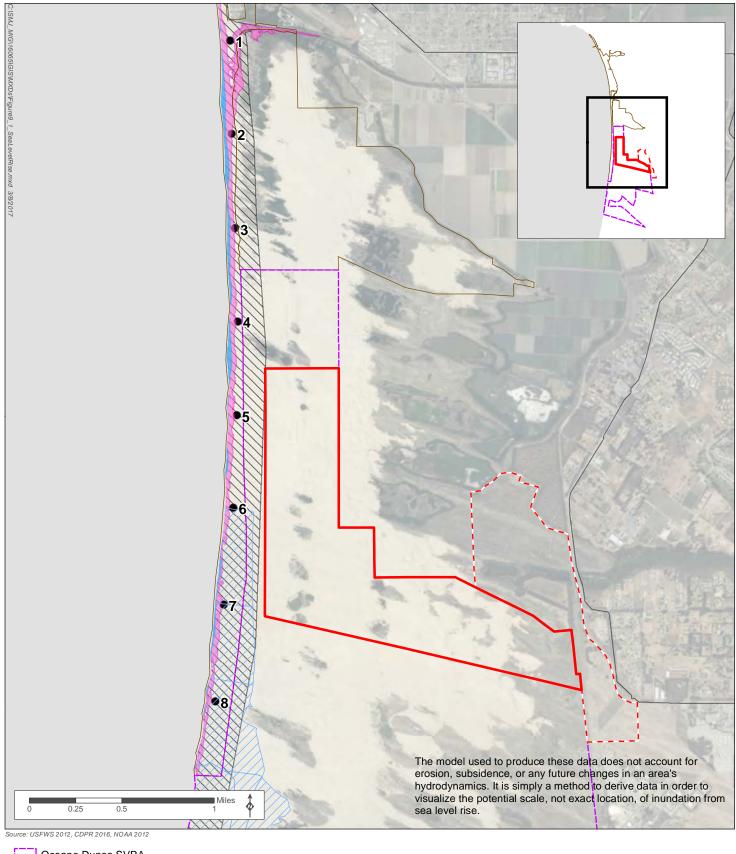












Oceano Dunes SVRA

Pismo State Beach

Proposed Dust Control Program area

Potential inundation from current Mean Higher High Water

Potential sea level rise inundation ranging from 1 to 6 feet above current Mean Higher High Water

Western snowy plover critical habitat

Seasonal exclosure

# CHAPTER 4 RESPONSES TO DRAFT EIR COMMENTS

This chapter contains a summary of the written comments received on or related to the Draft Program EIR during the public review period from August 2, 2016 through October 3, 2016. This chapter also provides a written response by the OHMVR Division, as the CEQA Lead Agency for the project, to each comment raising a significant environmental issue submitted on the Draft Program EIR.

The OHMVR Division received 23 comment letters during the Draft EIR review period, including three letters from a state agency (the California State Clearinghouse, California Department of Fish and Wildlife, and the California Coastal Commission), one letter from a regional agency (San Luis Obispo County Air Pollution Control District), eight letters from organizations, and 11 letters from members of the public. In addition, the OHMVR Division received approximately 41 oral comments from members of the public at the August 23, 2016 public meeting held on the Draft Program EIR. Each commenter was assigned a letter (i.e., "A", "B", etc.) and each specific comment was assigned an alpha-numeric identification number, as summarized in Table 4-1.

Table	Table 4-1 Summary of Public Comments Received on the Draft Program EIR					
ID	Commenter (Agency / Organization)	Comments				
Writte	Written Comments Received on the Draft Program EIR					
A	Scott Morgan (California State Clearinghouse)	A1 – A3				
В	Julie Vance (California Department of Fish and Wildlife, Central Region)	B1 – B16				
C	Yair Chaver (California Coastal Commission, Central Coast District)	C1 – C16				
D	Gary Willey (San Luis Obispo County Air Pollution Control District)	D1 -D14				
Е	Tom Roth (Law Offices of Thomas D. Roth)	E1 – E2				
F	Debbie Peterson (Peterson Team Realty)	F1 – F4				
G	Nick Lalanne (Pismo Dune Riders)	G1 – G2				
Н	Lucia Casalinuovo (Safe Beach Now)	H1 – H4				
Ι	Andrew Christie (Sierra Club, Santa Lucia Chapter)	I1 – I5				
J	Jeff Blewett (California 4 Wheel Drive Association, Inc.)	J1 – J2				
K	Jim Suty (Friends of Oceano Dunes)	K1 – K136				
L	Una Skadden (Interested Individual)	L1 – L2				
M	Bill Denneen (Citizens for a Vehicle Free Nipomo Dunes)	M1 – M3				
N	Dorothy Modafferi (Interested Individual)	N1 – N3				
О	Linda Reynolds (Interested Individual)	O1 – O2				
P	Joan Rice (Interested Individual)	P1				
Q	Rachelle Toti (Interested Individual)	Q1				
R	Michael Young (Interested Individual)	R1 – R3				
S	Norma and Ron Van Meeteren (Interested Individual)	S1 – S2				
T	Arlene Versaw (Interested Individual)	T1 – T10				

# Page 4-2

U	U Betty Cary (Interested Individual)			
V	Jeff Edwards (Interested Individual)	V1 – V12		
W	Rachelle Toti (Interested Individual)	W1 – W37		
Oral Comments Received on the Draft Program EIR				
OC	Unidentified Members of the Public	OC1 – OC41		

# **COMMENT LETTER "A"**



GOVERNOR

#### STATE OF CALIFORNIA

# GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



October 4, 2016

Ronnie Glock California Department of Parks and Recreation 340 James Way, Ste. 270 Pismo Beach, CA 93449

Subject: Oceano Dunes State Vehicular Recreation Area (SVRA) Dust Control Program

SCH#: 2012121008

Dear Ronnie Glock:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 3, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Director, State Clearinghouse

Enclosures

Scott Worgan

cc: Resources Agency

**A1** 

## Document Details Report State Clearinghouse Data Base

SCH# 2012121008

Project Title Oceano Dunes State Vehicular Recreation Area (SVRA) Dust Control Program

Lead Agency Parks and Recreation, Department of

Type EIR Draft EIR

Description Note: Extended Per Lead

CDPR, Off-Highway Motor Vehicle Recreation (OHMVR) Division proposes to implement a dust control program at Pismo State Beach and Oceano Dunes SVRA, in southwestern San Luis Obispo County. The project would involve the following OHMVR Division activities: 1) Planting up to approx. 20 acres of native vegetation per year at Oceano Dunes SVRA; 2) Temporarily deploying up to approx. 40 acres of wind fencing and/or straw bales per year at Oceano Dunes SVRA; 3) Potentially applying non-toxic soil stabilizers at Oceano Dunes SVRA; 4) Preventing track-out of sand onto Grand Avenue in the City of Grover Beach and Pier Avenue in Oceano; and 5) Dust and meteorological monitoring at Oceano Dunes SVRA

## Lead Agency Contact

Name Ronnie Glock

Agency California Department of Parks and Recreation

Phone 805-773-7180 Fax

email

Address 340 James Way, Ste. 270

City Pismo Beach State CA Zip 93449

#### **Project Location**

County San Luis Obispo, Santa Barbara

City Grover Beach, Pismo Beach

Region

Lat / Long 35° 03' 21" N / 120° 37' 3" W

Cross Streets Grand Ave, Pier Ave, Oso Flaco Road.

Parcel No. Project Covers Many Parcels

Township Range Section Base

#### Proximity to:

Highways SR 1; US Highway 101

Airports Oceano County Airport

Railways Amtrak

Waterways Pismo/Meadow/Oso Flaco Creeks; Black Lake Canyon

Schools Lopez HS, Mesa MS

Land Use Various including Ag, Recreation, and Open space/Resource conservation

#### Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Geologic/Seismic; Noise;

Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Landuse; Cumulative Effects; Aesthetic/Visual; Flood Plain/Flooding;

Forest Land/Fire Hazard; Public Services; Population/Housing Balance; Minerals; Solid Waste

#### Reviewing Agencies

Date Received 08/02/2016

Resources Agency; Department of Fish and Wildlife, Region 4; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol;

Caltrans, District 5; Regional Water Quality Control Board, Region 3; Native American Heritage

Commission; Public Utilities Commission

## 4.1 RESPONSE TO COMMENTS FROM THE STATE CLEARINGHOUSE

The OHMVR Division received three comments from Scott Morgan, Director, Office of Planning and Research, State Clearinghouse and Planning Unit. In general, these comments pertain to State Clearinghouse review requirements for the Oceano Dunes SVRA Draft Program EIR.

**Comment A1:** The State Clearinghouse notes it submitted the Oceano Dunes SVRA Draft Program EIR to selected state agencies for review. The Draft EIR public review period closed on October 3, 2016, and only one state agency submitted comments by that date – CDFW.

Response to Comment A1: Comment noted. Please refer to page 4-7 for a copy of comments submitted on the Draft Program EIR by CDFW and Section 4.2 of this Final Program EIR for the response to these comments.

**Comment A2:** The State Clearinghouse notes that Section 21104(c) of the California Public Resources Code states that "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Response to Comment A2: Comment noted.

**Comment A3:** The State Clearinghouse notes the OHMVR Division has complied with State Clearinghouse review requirements for draft environmental documents pursuant to CEQA.

Response to Comment A3: Comment noted.

ponses to Draft EIR Comments	Page 4
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EDMUND G. BROWN JR., Governor CHARLTON H. BONHAM, Director



1234 East Shaw Avenue Fresno, CA 93710 (559) 243-4005 www.wildlife.ca.gov

# COMMENT LETTER "B"

September 28, 2016

Ronnie Glick Senior Environmental Scientist California Department of Parks and Recreation Oceano Dunes District 340 James Way, Suite 270 Pismo Beach, California 93449

Subject: Oceano Dunes State Vehicular Recreation Area Dust Control Program (Program) Draft Program Environmental Impact Report (DPEIR) SCH# 2012121008

Dear Mr. Glick:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DPEIR from the California Department of Parks and Recreation (CDPR) for the Program pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines. CDFW previously submitted comments in response to the Notice of Preparation of an EIR dated March 6, 2015 and are enclosed and incorporated by reference.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Program that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Program that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts,

**B2** 

<sup>&</sup>lt;sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

**B2** 

## PROJECT DESCRIPTION SUMMARY

Proponent: CDPR, Off-Highway Motor Vehicle Recreation (OHMVR) Division

**Objective:** The objective is to implement a five-year Program to control and minimize emissions of dust and particulate matter (PM) that are generated at Oceano Dunes State Vehicular Recreation Area (SVRA) during periods of strong, persistent winds and subsequently blown downwind of the SVRA and onto the Nipomo Mesa. Primary Project activities include (1) planting approximately 20 acres of native vegetation per year at Oceano Dunes SVRA, (2) deploying approximately 40 acres of seasonal dust control measures from approximately March to September at Oceano Dunes SVRA, (3) potentially planting trees downwind of Oceano Dunes SVRA, (4) deploying dust and meteorological monitoring equipment at Oceano Dunes SVRA, and (5) preventing track-out of sand onto Grand Avenue in the City of Grover Beach and Pier Avenue in Oceano.

**B3** 

**Location:** Oceano Dunes SVRA is located in southwestern San Luis Obispo (SLO) County, approximately twelve miles south of the City of SLO, within the Coastal Zone established by the California Coastal Act and adjacent to the Cities of Grover Beach and Oceano. The SVRA borders and is contiguous with parts of Pismo State Beach. The proposed Dust Control Program area primarily consists of approximately 690 acres of state owned and -operated lands at Oceano Dunes SVRA, as well as some private lands downwind of the SVRA where trees may potentially be planted.

**Timeframe:** The OHMVR Division proposes to implement the Dust Control Program for an approximately 5-year period, beginning in spring 2017 and continuing through late 2022.

#### COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist the CDPR OHMVR Division in adequately identifying and/or mitigating the Program's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the potential for the Program to have a significant impact on biological resources, CDFW concludes that a Program Environmental Impact Report is appropriate for the Project. However, to appropriately address Program related impacts on biological resources, Project specific locations and biological resources must be identified through site

**B4** 

specific surveys and potentially evaluated through subsequent environmental review prior to specific Project implementation (CEQA Guidelines Section 15168(c)).

**B**4

CDFW is aware that the Program area may include potential habitat for the State and federally threatened State fully protected California least tern (*Sterna antillarum browni*); State and federally endangered Nipomo Mesa lupine (*Lupinus nipomensis*); State threatened and federally endangered La Graciosa thistle (*Cirsium scariosum var. loncholepis*); the State Fully Protected white-tailed kite (*Elanus leucurus*); the State Species of Special Concern (SSC) and federally threatened California red legged frog (*Rana draytonii*, CRLF) and Western snowy plover (*Charadrius nivosus nivosus*). Other sensitive species have the potential to occur within the Project area as well including sensitive plants, reptiles, amphibians, and birds. Additionally, the Project area supports habitat features such as central dune scrub, central foredunes and potentially other habitats which are considered sensitive by CDFW.

**B5** 

CDFW has concerns about the Program-related impacts to these sensitive habitats that are adjacent to or within the Program area, as well as the associated impacts to species that utilize these habitat types. CDFW recommends that biological surveys be conducted by a qualified wildlife biologist and botanist during the appropriate season(s) and that the results of these surveys are used to inform the analysis of impacts to resources and to potentially provision suitable avoidance, minimization, and mitigation measures to reduce impacts to less than significant levels in subsequent environmental review.

**B6** 

State Fully Protected Species: CDFW has jurisdiction over Fully Protected Species of birds, mammals, amphibians and reptiles, and fish pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Take of any Fully Protected Species is prohibited and CDFW cannot authorize their take. The following Fully Protected species may occur in the Project area: California least tern and white-tailed kite, (FGC §3511). The DPEIR is advised to address any impacts that may occur to fully protected species and is advised to include measures to preclude take of Fully Protected species on the Project site during construction, operations and maintenance of the Project. More information regarding Fully Protected species can be found on CDFW's website: https://www.dfg.ca.gov/wildlife/nongame/t e spp/fully pro.html.

B7

Permit Streamlining: Issuance of a Lake or Streambed Alteration Agreement (LSAA) and/or an Incidental Take Permit (ITP) by CDFW is considered a "project" (CEQA Guidelines Section15378) and is subject to CEQA. CDFW typically relies on the Lead Agency's CEQA compliance to make our own findings. For the Lead Agency's CEQA document to suffice for permit/agreement issuance, it must commit to fully describing the potential Project related impacts to stream/riparian resources and listed species, as well as measures to avoid, minimize, and mitigate impacts to these resources. Take of State listed species must be "fully mitigated" in order to comply with CESA (California Fish and Game Code Section 2081(b)(2)). If the CEQA document issued by the CDPR for this Program does not adequately analyze impacts to resources that require permits issued by CDFW, CDFW may need to act as a Lead CEQA Agency and complete a subsequent CEQA document. This could significantly delay permit issuance and, subsequently, Project implementation. For that reason, it is very important that the EIR reflect suitable and

feasible avoidance, minimization, and compensatory mitigation, such that we are able to make findings per CEQA necessary for ITP issuance. In addition, CEQA grants Responsible Agencies authority to require changes in a Project to lessen or avoid effects of that part of the Project which the Responsible Agency will be called on to approve (CEQA Guidelines Section 15041).

**B7** 

**Bird Protection:** CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Sections of the Fish and Game Code that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

**B8** 

Biological Information: CEQA requires a CEQA document and any subsequent environmental review to clearly identify resources in the Project area and their potential to be impacted by the proposed Project; analyze potential impacts as to their significance; and identify measures to reduce all potentially significant impacts to a level of less-than-significant. CDFW recommends surveys be conducted at the appropriate time of year to determine the presence/absence, location, and abundance of sensitive plant and animal species and natural communities which may occur on the specific Project site to support a complete impact analysis. Generally, CDFW supports measures and alternatives that would avoid and minimize potential impacts to resources of concern, as well as on-site conservation measures be considered prior to measures and alternatives that would provide for compensatory resources on- or off-site.

**B9** 

Botanical Inventory: As provided in the DPEIR, there is the potential for sensitive plant species to occur within the Program area. CDFW acknowledges that Standard and Specific Project Requirements to Minimize and/or Avoid Impacts to Special-Status Plants have been identified in the DPEIR. Botanical surveys are recommended to be conducted prior to specific Project activities and be performed in accordance with protocols and guidelines developed by CDFW (DFG, 2009) and the United States Fish and Wildlife Service (USFWS) (USFWS, 2000) to maximize the opportunity to detect special status plant species. Botanical surveys are floristic in nature and must be timed appropriately and cover the entire project and may require multiple surveys in order to detect all species which could potentially be present on the property before impact analysis occurs. The above referenced guidelines instruct the use of reference sites to confirm appropriate survey timing, particularly for seasonably variable, often difficult to detect species. Please note that environmental conditions have not been favorable for some plant species in the last few years and therefore special status plant populations may not express themselves adequately for detection and identification during surveys if environmental conditions are not adequate.

**B10** 

The DPEIR states under Section 2.4.1 (Dust Control Program Annual Review) that resources evaluations will be initiated by July 1 of each year. CDFW recommends that Project planning and Botanical surveys begin by early spring to maximize detection of all species that may occur on specific Project sites. The typical blooming period for Nipomo

Mesa lupine is between December and May. The typical blooming period for La Graciosa thistle is between May and August.

B10

Nesting Birds: The habitat within and in the vicinity of the Program area likely provides nesting habitat for shorebirds, songbirds and raptors. CDFW encourages Project implementation to occur during the non-nesting bird season. However, if ground-disturbing activities must occur during the breeding season (February through mid-September). Project applicant is responsible for ensuring that implementation of the Project does not result in any violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above. Prior to work commencing; including staging, clearing, and grubbing; CDFW recommends surveys for active nests be conducted by a qualified wildlife biologist no more than 10 days prior to the start of the Project commencing and that the surveys be conducted in a sufficient area around the work site to identify any nests that are present and to determine their status. A sufficient area means any nest within an area that could potentially be affected by the Project. In addition to direct impacts, such as nest destruction, nests might be affected by noise, vibration, odors, and movement of workers or equipment. Identified nests should be continuously surveyed for the first 24 hours prior to any construction related activities to establish a behavioral baseline. Once work commences, all nests should be continuously monitored to detect any behavioral changes as a result of the Project. If behavioral changes are observed, the work causing that change should cease and CDFW consulted for additional avoidance and minimization measures.

**B11** 

If continuous monitoring of identified nests by a qualified wildlife biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500 foot no-disturbance buffer around the nests of unlisted raptors until the breeding season has ended, or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Variance from these no-disturbance buffers may be implemented when there is compelling biological or ecological reason to do so, such as when the Project area would be concealed from a nest site by topography. Any variance from these buffers is advised to be supported by a qualified wildlife biologist and it is recommended CDFW be notified in advance of implementation of a no-disturbance buffer variance.

California Least Tern and Western Snowy Plover: As stated in the DPEIR, there is the potential for California least tern and western snowy plover to occur in portions of the Program area. CDFW notes that the DPEIR generally proposes activities which will avoid impacts to nesting least terns and snowy plovers by restricting dust control activities in these areas outside of the nesting period for these species (March – September). In addition, the DPEIR adheres to CDFW's prior guidance that a minimum 300 foot buffer be maintained around least tern and snowy plover nest sites if the seasonal restriction cannot be maintained. However, the DPEIR also states that the construction of protective perimeter fence posts, wind fencing, and some temporary dust and meteorological monitoring equipment could provide perching habitat for predatory avian species that could prey on California least tern and/or western snowy plovers and their nests. CDFW is concerned that the State fully protected California least tern and SSC western snowy plover may be impacted as a result of increased predation pressure from the installation of

**B12** 

Program structures and monitoring equipment. CDFW recommends that a specific Dust Control Program related monitoring effort be developed and implemented to identify potential impacts of Program related structures. If particular structures are identified as contributing to California least tern and western snowy plover predation, CDFW recommends that they immediately be removed and relocated if needed.

**B12** 

#### **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: <a href="http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB">http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB</a> FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: <a href="mailto:CNDDB@wildlife.ca.gov">CNDDB@wildlife.ca.gov</a>. The types of information reported to CNDDB can be found at the following link: <a href="http://www.dfg.ca.gov/biogeodata/cnddb/plants">http://www.dfg.ca.gov/biogeodata/cnddb/plants</a> and animals.asp.

**B13** 

#### **FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

B14

Conclusions: Biological studies are recommended to be conducted once specific project locations are identified and to include, but not be limited to, rare plants and nesting birds. Surveys are advised to be comprehensive, appropriately timed, and address the subsequent impact assessment of all special status species that are found to occur or are likely to occur on or near the specific Project site. If surveys identify the potential for special status species impacts or other potentially significant biological impacts, we recommend that subsequent environmental review be required for such projects and activities prior to project implementation. CDFW recommends that CDPR begin Project planning and resources evaluations earlier in the season to appropriately detect potential impacts to sensitive botanical species. Proposed measures to mitigate Project impacts are recommended to emphasize avoidance and minimization over translocation of resources or provision of compensatory resources on- or off-site. CDFW encourages Program implementation to occur during the non-nesting bird season. However, if ground-disturbing activities must occur during the breeding season. CDPR is responsible for ensuring that implementation of the Program does not result in any violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes. CDFW recommends that a specific Dust Control Program related monitoring effort be developed and implemented to identify potential impacts of increased predation pressures from Program related structures.

**B15** 

Thank you for the opportunity to comment on the DPEIR for the Oceano Dunes SVRA Dust Control Program. CDFW is available to consult with the CDPR regarding potential effects to biological resources, as well as specific measures which would mitigate potential effects of the project. Depending upon the results of the described biological surveys, actual Project site configuration, and other details which should be identified in specific Project biological reports, we may have additional comments and recommendations regarding avoidance, minimization, and mitigation of Project impacts to habitat and special status species. If you have any questions regarding these comments, please contact Brandon Sanderson, Environmental Scientist, at 3196 Higuera Street, Suite A, San Luis Obispo, California 93401, by telephone at (805) 594-6141, or by email at <a href="mailto:birandon.sanderson@wildlife.ca.gov">birandon.sanderson@wildlife.ca.gov</a>. You may also contact Craig Bailey, Senior Environmental Scientist, by telephone at (559) 243-4014, or by email at <a href="mailto:craig.sailey@wildlife.ca.gov">craig.sailey@wildlife.ca.gov</a>.

B16

Sincerely,

Julie A. Vance Regional Manager

Enclosure: March 2015, letter CDFW to CDPR

cc: Office of Planning and Research, State Clearinghouse, Sacramento

ec: Bill Standley

United States Fish and Wildlife Service

bill standley@fws.gov

Craig Bailey (CDFW)
Bob Stafford (CDFW)

Brandon Sanderson (CDFW)

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## 4.2 RESPONSE TO COMMENTS FROM CDFW

The OHMVR Division received 16 comments from Julie Vance, Regional Manager, California Department of Fish and Wildlife (CDFW), Central Region. In general, these comments pertain to the Draft Program EIR's analysis of biological impacts.

**Comment B1:** CDFW notes it previously submitted comments on the OHMVR Division's February 2015 Revised NOP of an EIR and incorporates those comments by reference.

Response to Comment B1: Comment noted. Draft Program EIR Sections 1.5.1 and 3.2.1 summarize the NOP process and comments received on the NOP, respectively. Specifically, Draft Program EIR page 3-3 notes CDFW commented on the NOP with regard to special-status species and biological resources impacts, and that these comments were addressed in Chapter 7, Biological Resources, of the Draft Program EIR. The OHMVR Division also notes Draft Program EIR Appendix A includes CDFW's comments submitted on the NOP. CDFW does not raise any additional, specific remarks regarding the comments it submitted on the February 2015 NOP that warrant response.

**Comment B2:** CDFW notes it is submitting comments as a Trustee Agency for fish and wildlife resources and as a Responsible Agency under CEQA because the proposed Dust Control Program may be subject to CDFW's lake and streambed alteration regulatory authority and/or may result in "take" of species listed pursuant to the California Endangered Species Act.

Response to Comment B2: Comment noted. Draft Program EIR Section 1.4.1 identifies that CDFW is a trustee agency with jurisdiction over the resources potentially affected by the proposed Dust Control Program, as well as a potential responsible agency under CEQA. The OHMVR Division has designed the proposed Dust Control Program to avoid "take" of species protected by the California Fish and Game Code and California Endangered Species Act (see the responses to Comments B6 and B7). The proposed Program is also designed to avoid impacts to jurisdictional waters and would, thus, not be subject to CDFW's Lake and Streambed Alteration regulatory authority (see the response to Comment B7).

**Comment B3:** CDFW summarizes the proposed Dust Control Program objectives, location, and timeframe.

Response to Comment B3: Comment noted. CDFW's summary of the proposed Program's objectives, location, and timeframe is generally accurate and consistent with the information presented in the Draft Program EIR.

**Comment B4:** CDFW states a Program EIR is appropriate for the Dust Control Program and notes that specific impacts on biological resources must be identified through site-specific surveys and potentially evaluated through subsequent environmental review prior to the implementation of specific dust control projects.

Response to Comment B4: Comment noted. The OHMVR Division directs CDFW to pages 1-11 and 2-11 of the Draft Program EIR, which explain the OHMVR Division is required (pursuant to CEQA) to consider subsequent dust control activities against the scope and content of the Program EIR. As described in Draft Program EIR Section 2.4.1, as revised in Section 3.3 of this Final Program EIR, the OHMVR Division is proposing an annual review process for dust control measures and activities that consists of planning, resource evaluation, agency coordination and review, and implementation phases. Specifically, the OHMVR Division will annually prepare draft and final planting

and seasonal dust control plans that identifies and describes the location of planned projects, describes the methods used to install, maintain, and remove (if necessary) these projects, evaluates the site-specific resources present in each project area, and each project's consistency with the Dust Control Program EIR and any applicable CDP conditions. Furthermore, Draft Program EIR Section 2.5, as modified by Section 3.3 of this Final Program EIR, describes the Standard and Specific Project Requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on potential biological resources that could be present in and near the Program area. These requirements include, but are not limited to, site-specific surveys for biological resources prior to implementing specific dust control activities (see also the response to Comment B5).

**Comment B5:** CDFW notes the Program area may include potential habitat for several special-status wildlife and plant species, as well as habitat that supports sensitive species, and recommends biological surveys be conducted by a qualified wildlife biologist and botanist during the appropriate season. CDFW also recommends site-specific surveys be used to inform subsequent environmental reviews.

Response to Comment B5: The Draft Program EIR: 1) adequately identifies the habitat types and special-status species that have the potential to occur in and near the proposed Dust Control Program area; and 2) includes site-specific surveys that would be used to inform the subsequent environmental review of Dust Control Program activities. The OHMVR Division directs CDFW to Draft Program EIR Section 7.2.1, which describes the different habitat types in and near the Dust Control Program area, and Section 7.2.2, which describes the special-status plant and wildlife species that are known to or that have a moderate to high potential to occur in the Dust Control Program area. In addition, Draft Program EIR Section 7.3.2, as revised by this Final Program EIR, describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on biological resources that could be present in and near the Program area. Specifically, these requirements specify that a qualified biologist shall conduct site-specific surveys prior to the start of dust control activities for special-status plants, amphibians and reptiles (including California red-legged frog), nesting birds, burrowing owls, western snowy plovers, California least terns, and American badger dens. Furthermore, the annual review process described in the response to Comment B4 requires the OHMVR Division to prepare a draft and final plans describing proposed and recently completed planting and dust control measures, including an analysis of whether measures incorporated into Program activities to avoid or minimize adverse impacts were effective and successful. Thus, as recommended by CDFW, the OHMVR Division would use the results of site-specific surveys conducted by qualified biologists to inform subsequent environmental review of Program activities.

**Comment B6:** CDFW notes it has jurisdiction over Fully Protected Species, that take of such species is prohibited, and that California least tern and white-tailed kite are Fully Protected Species that may occur in the Program area. CDFW notes the Program EIR should include measures that preclude take of Fully Protected Species during construction, operation, and maintenance of the Dust Control Program.

Response to Comment B6: The Draft Program EIR contains information and measures consistent with CDFW's comments. The OHMVR Division directs CDFW to Draft Program EIR Section 7.1.4, which discusses the California Fish and Game Code, including provisions related to Fully Protected Species. The OHMVR Division also

directs CDFW to Draft Program EIR Section 7.2.2.2, which identifies white-tailed kite (page 7-13) and California least tern (page 7-15) as Fully Protected Species.

As explained in the Draft Program EIR (pages 7-12 to 7-13), white-tailed kite is known to forage in the Dust Control Program area; however, no suitable nesting habitat for this fully protected species is present in the Program area. As are result, no "take" or other significant impacts to white-tailed kite are expected to since they do not nest in the Program area.

As explained in the Draft Program EIR (page 7-15) California least tern are known to nest west of the Program area, but the Program area will avoid any active California least tern nest areas in order to ensure no "take" of California least tern occurs. In addition, Draft Program EIR Section 7.3.2, as revised by this Final EIR, describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on California least tern. Specifically, in the vicinity of California least tern habitat, these requirements stipulate the OHMVR Division perform work activities outside the nesting season for these species, if feasible. If it is not feasible to avoid work activities during the California least tern nesting season, a qualified biologist would survey for nests prior to the start of work activities and, if nests are found during the survey, establish a minimum 300-foot buffer zone around the nest. In addition, a qualified biologist would also be available to monitor for the presence of nesting activity and have the authority to halt all work activities that might result in impacts to least tern. Thus, these measures would preclude take of California least tern as recommended by CDFW.

Comment B7: CDFW notes that the issuance of a Lake or Streambed Alteration Agreement (LSAA) and/or an Incidental Take Permit (ITP) by CDFW is considered a project subject to CEQA review. In addition, CDFW notes a CEQA document must fully described potential project impacts on biological resources. Finally, CDFW notes CEQA grants responsible agencies the authority to require changes in a project to lessen or avoid effects of that part of the project which the responsible agency will be called on to approve.

Response to Comment B7: Comment noted. CDFW does not make any specific recommendations regarding the Draft Program EIR, its analysis of biological resources, or measures included in the EIR to avoid and minimize potential impacts on biological resources. Draft Program EIR Chapter 7, as revised by this Final Program EIR (see Section 3.7), adequately described and evaluates the proposed Dust Control Program's potential impacts on biological resources. In addition, Draft Program EIR Section 7.3.2, as revised by this Final EIR (see Section 3.7), describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on potential biological resources that could be present in and near the Program area. These include requirements to conduct surveys and implement buffers and/or monitoring in coordination with the USFWS and/or CDFW, as appropriate and necessary, to ensure no listed species are harmed or killed due to Program activities. Since no mortality or harm to listed species would occur as a result of the proposed Program, an ITP would not be required. Please also see the OHMVR Divisions response to CDFW Comment B5 and CDFW Comment B6.

Similarly, as described in Draft Program EIR Section 7.3, the Dust Control Program would not impact riparian habitat because the Program area does not contain any riparian habitat. In addition, as described in Draft Program EIR Section 7.3.4, the proposed Dust

Control Program is unlikely to impact wetlands or other waters because most Program components would be installed in areas where these features are not present. Furthermore, Draft Program EIR Section 7.3.2, as revised by this Final EIR (see Section 3.7), describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on potential jurisdictional waters in areas where they are present. Therefore, an LSAA is not required for the proposed Program.

**Comment B8:** CDFW notes that it has jurisdiction over actions that may result in disturbance or destruction of active nest sites or the unauthorized take of birds (i.e., Fish and Game Code Section 3503, 3503.5, and 3513).

Response to Comment B8: Comment noted. CDFW does not make any specific recommendations regarding the Draft Program EIR, its analysis of biological resources, or measures included in the EIR to avoid and minimize potential impacts on biological resources. The Draft Program EIR contains information consistent with CDFW's comments. The OHMVR Division directs CDFW to Draft Program EIR Section 7.1.4, which discusses code provisions pertaining to the protection of birds and bird's nests, and notes it has revised the Draft Program EIR to include a discussion of Fish and Game Code Section 3513 (see Final Program EIR Section 3.7). In addition, as a point of clarification, the OHMVR Division is not proposing the disturbance or destruction of active nest sites or the unauthorized take of birds as part of the proposed Dust Control Program. Rather, Draft Program EIR Section 7.3.2, as revised by this Final EIR, describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on birds and nests that could be present in and near the Program area.

**Comment B9:** CDFW notes that a CEQA document and subsequent environmental review should clearly identify resources in the project area and their potential to be impacted by the proposed project, analyze potential impacts as to their significance, and identify measures to reduce all potentially significant impacts to less-than-significant. CDFW recommends surveys be conducted at the appropriate time of year to determine the presence/absence, location, and abundance of sensitive plant and animal species and natural communities which may occur on the specific project site to support a complete impact analysis.

Response to Comment B9: Comment noted. CDFW does not make any species-specific recommendations regarding the Draft Program EIR, its analysis of biological resources, or measures included in the EIR to avoid and minimize potential impacts on biological resources. The Draft Program EIR contains information and measures that are consistent with CDFW Comment B9. The Draft Program EIR provides a thorough description of the biological resources present in and near the proposed Dust Control Program area (Draft Program EIR in Section 7.2) and the proposed Program's potential to impact these resources (Draft Program EIR Sections 7.3.3 to 7.3.5). Furthermore, as described in the response to CDFW Comment B4 and Comment B5, the OHMVR Division is also proposing an annual review process as part of the EIR that consists of planning, resource evaluation, agency reporting and review, and implementation phases (Draft Program EIR Section 2.4.1). The resource evaluation phase of the review process includes a requirement to conduct biological and cultural resource evaluations for specific project locations at appropriate time periods (e.g., blooming seasons), which would ensure that impacts to species at specific dust control project locations are identified and addressed

prior to implementing the project. Please refer to the response to CDFW Comment B10 for additional information on special-status plant surveys.

**Comment B10:** CDFW notes the Draft Program EIR identifies there is the potential for sensitive plant species to occur within the Program area and recommends botanical surveys be conducted prior to specific program activities and in accordance with protocols and guidelines developed by CDFW and USFWS.

Response to Comment B10: The Draft Program EIR contains information and measures that are consistent with CDFW Comment B10. The OHMVR Division directs CDFW to Draft Program EIR Section 7.3.2, which includes a Specific Project Requirement to minimize and/or avoid impacts to special-status plants. As part of this requirement, the OHMVR Division would perform pre-construction surveys for special-status plants. Specifically, Draft Program EIR page 7-18 states, "These surveys should be conducted during the appropriate blooming period for species that are known to or have the potential to occur in work areas, and shall follow protocols established by the USFWS, CDFW, and CNPS." In addition, Draft Program EIR Section 7.2.2.1 summarizes information on Nipomo Mesa lupine and La Graciosa thistle, and Draft Program EIR Appendix B, Table B1 lists these species' blooming periods consistent with the information provided by CDFW. CDFW is correct that the annual review process described in Draft Program EIR Section 2.4.1 requires the OHMVR Division to conduct resource evaluations by July 1 of each year; however, the OHMVR Division has generally revised the annual review process to provide for more flexible planning, design, and implementation stages that do not preclude surveys for special-status plants during appropriate blooming periods (see Final Program EIR Section 3.3). Nonetheless, as shown in Section 3.7 of this Final EIR, the OHMVR Division has revised the Draft Program EIR's requirements pertaining to special-status plants to clarify when surveys should occur.

Comment B11: CDFW notes the habitat within and in the vicinity of the Program likely provides nesting habitat for shorebirds, songbirds, and raptors. CDFW encourages Program implementation to occur outside the nesting bird season, but notes that if ground-disturbing activities must occur during the breeding season the OHMVR Division is responsible for ensuring activities do not violate the Migratory Bird Treaty Act or Fish and Game Code. CDFW also recommends actions that can be taken to comply with regulations during the nesting bird season, including site-specific surveys, nest monitoring, and nest buffers.

Response to Comment B11: The Draft Program EIR contains information and measures generally consistent with CDFW's comments. The OHMVR Division directs CDFW to Draft Program EIR Section 7.1.4, which discusses the Migratory Bird Treaty Act and Fish and Game Code provisions pertaining to the protection of birds and bird's nests, and notes it has revised the Draft Program EIR to include a discussion of Fish and Game Code Section 3513 (see Final Program EIR Section 3.7). In addition, Draft Program EIR Section 7.3.2, as revised by this Final EIR, describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on birds and nests that could be present in and near the Program area. These requirements included nest surveys, monitoring, and buffers that are similar, but not identical to those, recommended by CDFW. As shown in Section 3.7 of this Final Program EIR, the OHMVR Division has revised these measures to be consistent with CDFW's recommendations for nest surveys, monitoring, and buffer sizes.

Comment B12: CDFW notes the Draft Program EIR identifies there is the potential for California least tern and western snowy plover to occur within the Program area. CDFW states the Draft Program EIR contains measures that will avoid impacts to nesting least terns and snowy plovers and adheres to CDFW's prior guidance regarding a minimum 300-foot-buffer be maintained around least tern and snowy plover nest sites. But CDFW also expresses concern certain Dust Control Program components such as monitoring equipment could provide perching habitat for predatory avian species that could prey on California least tern and/or western snowy plover. CDFW recommends a specific monitoring effort be developed and implemented to address potential impact and recommends immediately removing or relocating structures that are found to contribute to California least tern and western snowy plover predation.

Response to Comment B12: The Draft Program EIR contains information and measures similar in nature to CDFW's comments. Draft Program EIR Impact BIO-2 (page 7-23) includes a discussion of how monitoring equipment, including protective perimeter fence posts, wind fencing, and meteorological monitoring equipment, would provide perching habitat for predatory avian species that could prey on western snowy plover and California least tern. In addition, Draft Program EIR Section 7.3.2, as revised by this Final EIR, describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on birds and nests that could be present in and near the Program area. These requirements included buffers and measures to minimize predation pressure on California least tern and western snowy plover. As shown in Section 3.7 of this Final Program EIR, the OHMVR Division has revised these measures to include the removal and/or relocation of any specific structures found to contribute to California least tern and western snowy plover predation pressure immediately, as recommended by CDFW.

**Comment B13:** CDFW requests the OHMVR Division report any special-status species and natural communities detected during project surveys to the California Natural Diversity Database (CNDDB).

Response to Comment B13: Comment noted. As shown in Section 3.7 of this Final Program EIR, the OHMVR Division has added this reporting requirement to the Standard and Specific Project Requirements incorporated into the Dust Control Program to avoid and minimize impacts on potential biological resources that could be present in and near the Program area.

**Comment B14:** CDFW notes that a filing fee is necessary for the project.

Response to Comment B14: Comment noted. The OHMVR Division would provide all necessary filing fees if and when the OHMVR Division files a Notice of Determination with the State Clearinghouse.

**Comment B15:** CDFW provides concluding remarks that reiterate the information and recommendations provided in CDFW comments B4 to B13.

Response to Comment B15: Comment noted. Please see the response to CDFW Comments B4 to B13.

**Comment B16:** CDFW notes that they may have additional comments and recommendations regarding avoidance, minimization, and mitigation of Program impacts to habitat and special-status species depending on the results of surveys and other information collected by the OHMVR Division during implementation of the proposed Dust Control Program.

Response to Comment B16: Comment noted. As shown in Section 3.3 of this Final Program EIR, the OHMVR Division has modified the annual review process described in Draft Program EIR Section 2.4.1 to include submittal of draft and final planting and seasonal dust control plans to CDFW. This will ensure that CDFW has an opportunity to comment on potential effects of specific dust control activities.

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# CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE 725 FRONT STREET, SLITE 180 SANTA CRUZ, CA 95860 PILONE: (83.) 427-4861 FAX: (83.) 427-4877 WKB; WWW COASTAL, CA GOV

# **COMMENT LETTER "C"**



October 4, 2016

Ronnie Glick Senior Environmental Scientist California Department of Parks and Recreation Oceano Dunes District 340 James Way, Suite 270 Pismo Beach, CA 93449

Subject: Oceano Dunes State Vehicular Recreation Area Dust Control Program Draft Program Environmental Impact Report (August 2016)

Dear Mr. Glick:

Thank you for the opportunity to provide input on the above-referenced Draft Program Environmental Impact Report (DEIR). As described in the DEIR, State Parks' Off-Highway Motor Vehicle Recreation Division (Parks) is proposing a five-year dust control program at the Oceano Dunes State Vehicular Recreation Area (ODSVRA) to address particulate matter (specifically PM10) emissions associated with activities at ODSVRA in order to comply with San Luis Obispo County Air Pollution Control District's (APCD) Rule 1001. The DEIR includes analyses of the impacts of a proposed dust control project that consists of:

- Planting approximately 20 acres of native vegetation per year at ODSVRA.
- 2. Deploying approximately 40 acres of seasonal dust control measures including wind fencing, straw bales, porous roughness elements and possibly non-toxic soil stabilizers, from approximately March to September at ODSVRA.
- 3. Potentially planting trees downwind (i.e., inland) of ODSVRA.
- Deploying dust and meteorological monitoring equipment at ODSVRA.
- Preventing track-out of sand onto Grand Avenue in the City of Grover Beach and Pier Avenue in Oceano.

At the onset, we want to make it clear that we very much understand the crucial need to reduce PM10 concentrations inland of ODSVRA, and particularly in the Nipomo Mesa, to protect the health and safety of residents and visitors. As you know, we have worked very closely with Parks, the APCD, the California Air Resources Board (CARB), and other interested groups and individuals for many years to help Parks in its efforts to deal with wind-borne and other dust associated with ODSVRA, and we continue to support aggressive efforts to address this significant public health issue. We hope that these comments help to frame the debate and to move forward protective measures as much as possible in that regard. At the same time, we are

**C1** 

also in a position to evaluate Parks' proposed dust control program pursuant to the Coastal Act because the measures proposed require a coastal development permit (CDP) application. As you are aware, that CDP application is currently waiting for materials necessary to file it as complete, including critically completing this EIR process. As part of that CDP process, the Commission will need to evaluate the impact of the proposed dust control measures on coastal resources and ensure consistency with the policies of Chapter 3 of the Coastal Act. The data, analysis, and conclusions offered in this DEIR thus provide critically important information for our future review of the CDP for the proposed project, and these comments must be understood in that regard as well.

C<sub>2</sub>

We previously provided both EIR Notice of Preparation (NOP) comments (dated January 29, 2013, see attached) and Administrative DEIR (ADEIR) comments (dated December 22, 2015, see attached). Our previous comments included a number of observations relating to important coastal resource protection issues, intended as suggestions for the framing and structure of the DEIR. We note that the DEIR addressed a few of our previous comments, but on the whole the DEIR is substantially the same as the ADEIR, and so most of our comments and observations are as relevant today as they were last December. Please see our previous attached comment letters is that regard, which are provided here as comments on this DEIR as well.

C3

Below are our comments on the DEIR.

# 1. Dust Control Program Objectives and APCD-approved Particulate Matter Reduction Plan (PMRP)

APCD Rule 1001 requires ODSVRA to prepare and implement an APCD-approved Particulate Matter Reduction Plan (PMRP) in order to reduce PM10 emissions consistent with the rule. On pages 1-8 the DEIR states that "In July 2013, the APCD conditionally approved the OHMVR Division's PMRP." However, it is our understanding that APCD did not approve a PMRP, but rather APCD approved the steps Parks would need to take in order to **develop** a PMRP. Thus, it is unclear whether the proposed particulate reduction measures meet APCD's requirements as specified in the Rule. As such, it is unclear if the proposed project will actually meet APCD requirements.

C4

As we indicated in our January 29, 2013 NOP comments and in our December 22, 2015 ADEIR comments, it is critical that a CEQA document correctly frame the project description and objectives, as well as the thresholds of significance. While there may be secondary objectives, it has always been our understanding that the primary objective of the project is intended to be Rule 1001 compliance. It is not clear to us whether the proposed project meets APCD's Rule 1001 requirements. The DEIR should thus revise its project description and objectives to state that Rule 1001 compliance is the primary objective, and explain how the proposed measures do or do not meet those requirements.

#### 2. Dust Control Measures and Alternatives

The DEIR describes dust control measures to be used for reducing PM10 emissions. The DEIR proposes to plant up to 20 acres of vegetation every year over a period of five years, deploy seasonal measures (i.e., wind fencing and straw bales) over a 40-acre area, with the possibility of planting trees outside ODSVRA boundaries. The preferred program proposes to plant the majority of the vegetation outside the riding area.

We disagree with many of the DEIR's assumptions and conclusions for selecting the preferred program. The DEIR supports the preferred program because it indicates that it will result in less area being closed off to off highway vehicle (OHV) riding, not because it is scientifically best suited for compliance with Rule 1001. In fact, and as discussed further below, it has been shown that the open riding areas produce higher levels of PM10. The DEIR does not provide sufficient support for a conclusion that the preferred scenario creates the least environmental impact or is the best way to achieve compliance with Rule 1001.

The DEIR dismisses other alternatives based on a variety of reasons, including economic and logistic uncertainty, failure to reduce significant recreation impacts due to OHV riding area reduction, and due to impacts on aesthetics or biological resources. We disagree that additional planting of dune vegetation is an adverse visual impact. We are also concerned that the wind fencing and straw bale measures will be of only limited effectiveness to meet project objectives. As you are aware, our staff biologist, Dr. Laurie Koteen, has been actively engaged with Parks and its consultants and other parties (like APCD and CARB) regarding applicability and utility of various dust control measures at ODSVRA, including with respect to monitoring their efficacy over time. The wind fencing and straw bale measures proposed in the DEIR program are the same as measures that Parks has already undertaken over the years, and these measures have been shown to only have moderate efficacy in preventing sand saltation inside the array, and a rapidly diminishing efficacy on PM10 control outside the arrays. In fact, their effect appears negligible, particularly as it relates to the significant problems on the Nipomo Mesa has been shown to be non-detectable. It is not clear to us that these measures will be enough to meet project objectives (see also alternatives analysis discussion below).

Furthermore, the DEIR calls for only 40 acres of these seasonal wind fencing and straw bale measures. Parks has deployed these same seasonal measures at ODSVRA each of the last three years (i.e., 2014, 2015, and 2016). Past experience indicates that deploying straw bales in non-riding areas at ODVRA has led to ESHA impacts, including with respect to the difficulty of removing the straw bales seasonally. And wind fencing within the riding area has led to other concerns being expressed, including from riding enthusiasts. And, as indicated above, neither appears to have provided significant dust control relief that might help to explain how and why those types of impacts might be allowed consistent with the Coastal Act. Therefore, absent a clear showing in the DEIR that these measures have had a measurable impact on PM10 emissions, deploying these same measures at this same scale going forward does not seem likely to us to lead to meaningful PM10 reductions, particularly as it relates to the Nipomo Mesa area.

**C5** 

**C6** 

We would strongly suggest that alternative measures and combinations of measures be evaluated in the EIR. We agree with Parks that the proposed native vegetation planting is a measure that should be pursued, including as data from previous years has indicated that such planting is likely to provide the best dust control results overall. And we would also suggest that such planting areas be chosen based on their predicted ability to reduce dust problems associated with ODSVRA. That may mean that select riding areas need to be vegetated and allowed to provide a natural dust barrier. And these measures need to be coordinated directly with any tree planting areas that are proposed as well.

**C7** 

Furthermore, it has been shown that the riding areas are the most emissive locations at ODSVRA, and that vegetation may well be the best method to capture such dust within ODSVRA. The DEIR states "Foredunes in the Dust Control Program area support mostly herbaceous vegetation adapted to blowing sand. Dune mat is the predominant native vegetation alliance in the foredunes. Dune mat is dominated by sand verbena (*Abronia* sp.) and/or beach bur (*Ambrosia chamissonis*) mixing with other perennial herbs, grasses, and low shrubs to form a low canopy." However the DEIR goes on to state "The Dust Control Program boundary avoids the majority of the foredune habitat in the vicinity of the Program; however, this is a common habitat to the north, south and west of the Program area." However, the DEIR does not evaluate an alternative where vegetation is planted in the foredunes as a means of compliance with Rule 1001's mandate to reduce PM10 levels as required. In fact, it is our understanding that dune vegetation planting in the fore dune area may well result in the most effective way of reducing PM10 emissions at ODSVRA

**C8** 

We therefore suggest that Parks evaluate an alternative in the DEIR whereby dust control measures would include planting out the foredune areas in ODSVRA as a means of developing a natural barrier/'catch' for wind-blown sand and dust. The evaluation should be considered across the same set of evaluation criteria and assumptions applied to other alternatives, including that all such alternatives need to be evaluated in terms of their ability to reduce PM10 emissions, as well as the way in which they might modify the environment, including with respect to OHV use. We think it will be important to understand options like this as we evaluate whatever becomes Parks proposed CDP application project in the future.

TC9

## 3. Dust and Meteorological Monitoring

Section 2.3.2.5 states that Parks would monitor the efficacy of the dust control measures. The section goes on to state "The OHMVR Division would perform monitoring on an as-needed basis during the five-year period covered by this EIR to support siting vegetation, wind fencing, and straw bale projects and evaluating the effectiveness of such projects." However, it is not clear what Parks is proposing to do in case the data show that the dust control measures are ineffective at reducing dust or meeting Rule 1001 requirements. As we have long discussed, a major component of any successful project is going to be the ability for adaptation, and the project needs to be defend well enough that triggers for adaptation can be explicitly identified. Such triggers are going to need to be a major component of any CDP here, and we would

C<sub>10</sub>

strongly suggest that the DEIR be supplemented with an entire adaptation strategy, complete with specific triggers for adaptation related to monitoring data..

C10

# 4. Recreational Impacts Analysis

The DEIR identifies a threshold of significance where a significant impact would occur if the project would "Substantially limit, reduce, or interfere with established coastal recreational opportunities at Oceano Dunes SVRA." The DEIR indicates that the proposed dust control measures will permanently or temporarily close off between 5.3 to 7.7 percent of the available riding area. The DEIR goes on to state that whether this amount of loss is significant or not is a subjective measure, stating "While these percentage values may not seem large in and of themselves, any permanent or temporary loss of OHV recreation lands at Oceano Dunes SVRA is important given the site's history, popularity, and unique coastal recreational opportunities, plus the lack of similar facilities in the state." Further, the DEIR finds that the project may not be consistent with the Coastal Act (PRC sections 30210, 30213, and 30223) since "the proposed Dust Control Program could conflict with the

California Coastal Act because the preferred Dust Control Program scenario would impact 78 acres of coastal OHV recreation lands, and the alternate program scenario does not maximize existing, historical, and traditional coastal OHV recreational opportunities at Oceano Dunes SVRA."

C11

As you are aware, we are strong supporters of coastal recreation, and can clearly understand Parks intent in this regard. However, it is premature to draw Coastal Act conclusions, even preliminary conclusions, and it is not the DEIR's role to draw them. The DEIR needs to identify the impacts associated with the proposed project and alternatives to it. That is its purpose. It is the Coastal Commission's role to draw Coastal Act conclusions regarding that data. We would strongly suggest that such Coastal Act conclusions be eliminated, particularly any that rely on a threshold of significance designed to disallow any reduction of OHV riding area. Yes, any such reduction has its own impacts that must be understood, and it is the role of the DEIR to identify such impacts, but the evaluation of the appropriate balance between sometime competing coastal resource values associated with a CDP application under the Coastal Act is the Commission's role. This DEIR needs to provide clear identification of such impacts for analysis, and then the Commission will evaluate them in the CDP application. Please modify the DEIR accordingly. In addition, the DEIR calls out OHV riding as a coastal dependent activity. As we previously indicated in our comments to you (see attached), OHV riding is not coastal dependent. The definition of a "Coastal-dependent development or use" includes any development or use which requires a site on, or adjacent to, the sea to be able to function at all" (Coastal Act Section 30101). While there are some recreational activities that could constitute coastal-dependent activities at ODSVRA (e.g., surfing, surf fishing, ocean swimming, kite boarding, kayaking, etc.), OHV use and camping are not two of them. OHV riding is not dependent on a site near the ocean, nor is camping. In fact, many OHV areas and campgrounds exist inland, negating them being able to be called coastal-dependent. The fact the ODSVRA currently provides for such uses does not mean that the uses are coastal-dependent as that term is defined and understood per

C12

the Coastal Act. It would be inaccurate for the DEIR to represent as much, and all references and analyses in the DEIR need to be corrected in that respect.

C12

#### 5. Dust Control Measure Siting Considerations

Parks cites a number of factors that influence the project's proposed dust control siting. These factors include Rule 1001 compliance, and resource and recreation management considerations. The project envelope and location of proposed dust control measures is shown in DEIR figures 2-8 and 2-9.

The DEIR proposes to exclude vegetation planting within approximately 1,100 feet (in the vicinity of marker posts 4 and 5) to 1,500 feet (in the vicinity of marker post 7) of the mean high tide line, in part because that is where snowy plover and California least tern nesting activity takes place. The DEIR cites Stanzel at al. 1981 in support of the project vis-à-vis western snowy plover nesting locations. In the study the researchers found that nests are usually found within 100 feet of the water. However the DEIR points out that within ODSVRA snowy plover nesting occurs hundreds of feet away from the water. None the less, the program's western boundary is over 1,000 feet eastward of the water. It's not clear planting vegetation in a portion of the foredunes would interfere with plover nesting sites. Please supplement the DEIR analysis with additional information on nesting needs, particularly in relation to the effect of potential vegetation planting as it relates to the foredune areas (see also above).

C<sub>13</sub>

## 6. Program Description.

The DEIR describes the program area as a 690 acre tract of land where dust control measures would be deployed. However, the DEIR then ascribes almost 113-acres for dust control. It seems misleading to us to describe the proposed program this way. Please refine and update the acreage description to account for the various types of uses within the park (e.g., riding and non-riding areas) and their relation to the proposed project.

C14

In sum, we believe that the DEIR needs to be significantly updated to serve the needs of the Commission related to Parks pending CDP application. As an overall matter, we believe that the project description and objectives need to be clarified and refined specific to Rule 1001 requirements, and the chosen dust control measures and adaptation program for them more clearly defined. Furthermore, we strongly suggest alternatives that lead to a reestablishment of the vegetated foredunes be evaluated in the DEIR. Our attached ADEIR comments provide additional definition on these points and should be consulted as you move forward with the DIER and the CEQA process.

C15

Stenzel, L.E., Peaslee, S.C., Page, G.W., 1981. The Breeding Status of the Snowy Plover in California. II. Mainland Coast. Western Birds 12, 6–16.

As you are aware, we have long worked very closely with Parks on their dust control efforts over the years, and we hope to continue to do so moving forward. In particular, we very much want to do what we can to help you complete this DEIR process so as to allow for the Commission to review and decide on the required CDP application to implement the program. In addition, we also want these efforts to dovetail as much as possible with the schedule re-review of the ODSVRA CDP. Mostly, though, we want to help Parks as it deals with this significant public health issue at ODSVRA. The sooner we can provide effective tools to abate wind-borne and other dust associated with ODSVRA the better. We know Parks shares this sentiment, and we stand ready to help. Please do not hesitate to contact me if you have any questions or would like to discuss the DEIR, the upcoming re-review, the CDP application, or all of the above.

C16

Sincerely,

Yair Chaver Coastal Planner Central Coast District Office



- Dust Control Project NOP conuments dated January 29, 2013
- Dust Control Project ADEIR comments dated December 22, 2015

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## 4.3 RESPONSE TO COMMENTS FROM THE CALIFORNIA COASTAL COMMISSION

The OHMVR Division received 16 comments from Yair Chaver, Coastal Planner, California Coastal Commission, Central Coast District. In general, these comments pertain to the Draft Program EIR's project description, objectives, discussion of consistency with the Coastal Act, and alternatives analysis.

**Comment C1:** The CCC summarizes the proposed Program and notes it understands the crucial need to reduce PM10 concentrations inland of Oceano Dunes SVRA and supports aggressive efforts to address this issue.

Response to Comment C1: The CCC's summary of the proposed Dust Control Program is accurate.

**Comment C2:** The CCC notes the OHMVR Division's Coastal Development Permit application submitted for the proposed Dust Control Program is incomplete, and that as part of the CDP process, the CCC will need to evaluate the impact of the proposed Program on coastal resources and ensure consistency with the policies of Chapter 3 of the California Coastal Act.

Response to Comment C2: Section 1.4.2 of the Draft Program EIR identifies that the OHMVR Division has applied for a Master CDP from the CCC, Central Coast District (CDP Application #3-12-050). In addition, Section 2.6 of the Draft Program EIR indicates a CDP is required for the Program to be implemented and identifies the CCC as a responsible agency under CEQA. Furthermore, the Draft Program EIR explains (page 5-1) the proposed Program is subject to a consolidated CDP process by which the CCC will act upon the OHMVR Division's CDP application. Under this process, the standard of review is Chapter 3, Coastal Resources Planning and Management Policies, of the Coastal Act. The OHMVR Division directs the CCC to the Draft EIR's discussion of the Program's consistency with the Coastal Act's planning and management policies on pages 5-4 to 5-11 (Draft EIR Table 5-1) and pages 5-15 to 5-18 (Draft EIR Impact LUP-2). The OHMVR Division's CDP application and the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC. Accordingly, the Draft EIR states (page 5-18), "the CCC may determine the Dust Control Program, as described in this EIR, is consistent with the Coastal Act and/or impose additional conformance on the Program as necessary to support its issuance of a CDP and the Program's conformance with the Coastal Act." Refer also to the response to CCC Comment C9 and C11 below for additional information on this issue.

Comment C3: The CCC notes it previously provided comments on the OHMVR Division's February 2015 Revised Notice of Preparation of an EIR, as well as a December 2015 Administrative Draft version of the EIR. The CCC indicates the 2016 Draft Program EIR addressed only a few of the CCC's previous comments pertaining to important coastal resource protection issues, and provides the same comment letters again for the OHMVR Division's consideration.

Response to Comment C3: The CCC does not specifically identify which of its previously submitted comments pertaining to important coastal resource protection issues were not addressed in the EIR. The OHMVR Division, therefore, cannot provide a specific, detailed response to Comment C3. Nonetheless, the OHMVR Division notes:

• The CCC has re-submitted comments dated January 29, 2013. The CCC originally submitted these January 2013 comments on the OHMVR Division's

December 2012 NOP for an EIR that was being prepared for an earlier iteration of the proposed Dust Control Program. The prior Dust Control Program, as described in 2012, was much broader (both in terms of scope and duration) than the current Dust Control Program described and evaluated in the OHMVR Division's February 2015 Revised NOP and August 2016 Draft Program EIR. Thus, the OHMVR Division does not consider comments submitted on the 2012 NOP germane to the current Draft Program EIR.

The CCC, in its March 2015 comment letter on the OHMVR Division's Revised NOP, requested the Draft EIR clearly articulate Program objectives and evaluate a robust and full range of alternatives, including restrictions on OHV use and vegetating foredunes. These comments were briefly summarized and included in full in Draft Program EIR Section 3.2.1 and Appendix A, respectively. The Draft Program EIR adequately addressed all EIR scoping comments. Specifically, Section 2.1 of the Draft Program EIR clearly articulates the OHMVR Division's objectives for the proposed Dust Control Program. In addition, Draft Program EIR Chapter 12 addresses a range of reasonable alternatives to the proposed Dust Control Program, including OHV use restrictions and planting vegetation closer to shore in the form of foredunes.

The CCC has also re-submitted comments dated December 22, 2015. These comments were submitted on an Administrative Draft version of the Draft Program EIR that was not made available for general public review<sup>4</sup>. In its comments, the CCC stated, "Importantly, we are not here commenting per se on the [Administrative Draft EIR] and its analyses; rather, we are trying to provide some input on its framing and structure as you finalize the [Administrative Draft EIR] . . . " The CCC generally noted that the Administrative Draft EIR's project description, objectives, thresholds of significance, and alternatives would benefit from detail and refinement, including analysis of costs and benefits of the proposed Program and clarification that OHV use and camping is not a use dependent on a site near the ocean. These comments are similar in nature to the comments the CCC submitted on the Draft Program EIR. The OHMVR Division did consider the comments provided by the CCC in December 2015 in the preparation of the Draft Program EIR, and has addressed comments regarding the EIR's project description, thresholds of significance, impact analyses, and alternatives in the responses to CCC Comments C4 through C15 below. As a point of clarification, the proposed Program applies to indirect sources of dust at Oceano Dunes SVRA only, it does not address any direct emissions sources.

Comment C4: The CCC notes that SLOAPCD Rule 1001 requires the OHMVR Division to prepare a Particulate Matter Reduction Plan (PMRP) and asserts the Draft Program EIR page 1-8 incorrectly identifies the approval status of this PMRP. The CCC also states that it is unclear if the proposed Dust Control Program will meet SLOAPCD Rule 1001 requirements, and that the Draft Program EIR should be revised to indicate Rule 1001 compliance is the primary objective of the proposed Program.

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<sup>&</sup>lt;sup>4</sup> In addition to the CCC, the OHMVR Division provided this same Administrative Draft version of the Dust Control Program EIR to the CARB and SLOAPCD for review and comment.

Response to Comment C4: The CCC is incorrect when it states that the SLOAPCD did not approve a PMRP. As noted on page 1-8 of the Draft EIR, the APCO approved the OHMVR Division's PMRP in July 2013. The letter approving the PMRP states "... we conditionally approve the March 29, 2013 version of the [Oceano Dunes SVRA] Rule 1001 Draft PMRP, with the following exceptions and conditions: 1) Comply with the conditionally approved Monitoring Site Selection Plan. 2) Obtain Air Pollution Control Officer approval of the PM10 monitoring network required by Rule 1001.C.2.a. 3) Install and begin operation of the PM10 monitoring network by July 31, 2014" (SLOAPCD 2013). The OHMVR Division has installed the PM10 monitoring network required by Rule 1001 (see Draft EIR Table 1-2), although as shown in Section 3.3 of this Final Program EIR, the Oso Flaco Station is currently inactive. Nonetheless, the APCO's letter does, in fact, approve the OHMVR Division's PMRP.

The CCC is correct the Draft EIR does not explicitly state whether or not the proposed Dust Control Program would meet the Rule 1001 performance standard<sup>5</sup>. In regards to this comment, the OHMVR Division notes:

- Both the February 2015 Revised NOP (page 3) and the August 2016 Draft Program EIR (pages 1-1, 2-1, 5-11, and 12-4), describe the proposed Program is intended, in part: 1) to control and minimize dust and particulate matter emissions produced at Oceano Dunes SVRA during strong wind conditions; and 2) to improve air quality on the Nipomo Mesa. These specific purposes are set forth in three of the nine objectives the OHMVR Division has set for the proposed Program (Draft EIR page 2-1, see objective nos. 1-3). As of the writing of this Final EIR (March 2017), it is not possible for the OHMVR Division, the SLOAPCD, CARB, or any other agency to definitively and conclusively identify what magnitude of dust control is necessary to achieve compliance with the Rule 1001 performance standard. The OHMVR Division directs the CCC to Section 1.1.3 of the Draft Program EIR, which summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA and which helped to form the basis for the proposed Dust Control Program. None of these studies describe the level of dust control necessary to achieve compliance with the Rule 1001 performance standard. Even the SLOAPCD, in its comments on the Draft Program EIR, acknowledges that the magnitude of emissions reductions, as well as the areas where mitigation will be most effective, is still being evaluated (see response to Comment D2).
- The uncertainty surrounding the magnitude of dust control measures needed to comply with the Rule 1001 performance standard is a major reason why the OHMVR Division has set forth clear *and* flexible objectives for the proposed Program (e.g., see Draft EIR page 2-1, objective 3, to "make ongoing and best possible progress toward compliance with SLOAPCD Rule 1001 performance standard"). Importantly, the clear and flexible objectives set for the proposed

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<sup>&</sup>lt;sup>5</sup> The Rule 1001 performance standard is described on Draft Program EIR page 1-8: "Compliance with a performance standard that requires PM10 concentrations at the APCO-approved CDVAA [Coastal Dunes Vehicle Activity Area] Monitor to be no more than 20% higher than the PM10 concentrations at the APCO-approved control site monitor. The performance standard applies only when the 24-hour average PM10 concentrations at the approved CDVAA Monitor exceeds 55 micrograms per cubic meter." See also Draft Program EIR Table 2-1 (on Draft Program EIR page 1-9).

- Program do not preclude achieving compliance with the Rule 1001 performance standard. Furthermore, the clear and flexible objectives set for the proposed Program enable the OHMVR Division to consider a range of reasonable alternatives to the proposed Program that also make progress towards achieving compliance with the Rule 1001 performance standard. Since the level of dust control necessary to achieve compliance with the Rule 1001 performance standard is not known at this time, explicitly setting this as a Program objective may render both the proposed Program and any alternative "infeasible" from a technological, legal, and / or economic standpoint.
- The uncertainty surrounding the magnitude of dust control measures needed to comply with the Rule 1001 performance standard is also a major reason why the OHMVR Division prepared a Draft Program EIR that evaluates the environmental effects of installing *one or more* temporary or permanent dust control measures *somewhere* within an approximately 1,000-acre area (or more than one square mile) over a *multi-year time period*. As noted on page 2-1 of the Draft Program EIR (emphasis added), "In general, the proposed Dust Control Program, as called for in Rule 1001, would involve an *iterative series of dust control activities that would be evaluated and revised as necessary to meet goals set by the OHMVR Division, SLOAPCD, and CARB* which, as outlined in the Rule 1001 settlement agreement, are to 'achieve an immediate goal of meeting the Federal PM10 standard at the monitor located on the Nipomo Mesa known as CDF and to provide ongoing progress toward achieving the State PM10 standards and meet the standards set forth in Rule 1001."
- As a point of clarification, the OHMVR Division has not set forth "primary" and "secondary" objectives for the proposed Dust Control Program, nor does CEQA require the OHMVR Division to do so. Although Section 2.1 of the Draft Program EIR does set forth objectives related to dust control, PM10 concentrations, and compliance with air quality standards and Rule 1001 compliance requirements first, the OHMVR Division, as CEQA lead agency, has developed objectives for the proposed Program that balance a variety of factors. The need for a CEQA lead agency to balance a variety of public objectives is expressly noted in CEQA Guidelines section 15021(d), which states, "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian." The objectives the OHMVR Division has set forth for the proposed Program consider the various public safety, recreation, and natural resource objectives the OHMVR Division must balance when considering whether to approve the proposed Program.

As explained above, the OHMVR Division has set forth clear and flexible objectives for the proposed Program that enable consideration of a reasonable range of alternatives, balance public safety, recreation, and natural resources considerations, and do not preclude compliance with Rule 1001. For these reasons, the Draft Program EIR's project description and list of objectives do not require revision.

**Comment C5:** The CCC expresses disagreement with the Draft Program EIR's assumptions and conclusions for "selecting" the preferred program and states that open riding areas produce higher levels of PM10.

Response to Comment C5: The CCC incorrectly characterizes the information presented in the Draft Program EIR. The OHMVR directs the CCC to Section 2.3.4 of the Draft Program EIR, which summarizes the amount of land that the proposed Dust Control Program could occupy at Oceano Dunes SVRA. This section states (emphasis added), "The OHMVR Division would configure the proposed activities to maximize dust reduction upwind of CDF and minimize permanent loss of recreation opportunities at Oceano Dunes SVRA. The actual implementation of dust control measures and vegetation schemes would depend on several factors, including the future PM10 concentrations at the CDF monitoring station, the results of dust control monitoring from within Oceano Dunes SVRA, existing environmental resource constraints (e.g., biological and cultural resources), and logistical issues such as seed availability and growing space; however, the OHMVR Division has identified *conceptually* preferred and alternate scenarios for *possible* implementation." Thus, the OHMVR Division has not "selected" any implementation scenario as the CCC purports. Rather, the EIR identifies two possible scenarios for implementing the proposed Dust Control Program and notes that the actual implementation would depend on air quality conditions, resource constraints, and logistical factors.

The identification and graphical presentation (see Draft Program EIR Figures 2-8 and 2-9) of preferred and alternate Dust Control Program scenarios is intended to facilitate public understanding of the proposed Program and the OHMVR Division's evaluation of potential environmental effects associated with the implementation of the proposed Program. As a point of clarification, Draft Program EIR Section 2.3.4 does not state the preferred scenario creates the "least environmental impact" as the CCC purports. While it is true Draft Program EIR Section 2.3.4 does state, "The alternate [Dust Control Program] scenario represents the worst-case impact to public recreation lands at Oceano Dunes SVRA," the Draft Program EIR evaluates both the preferred (up to 78 acres) and alternate (up to 113 acres) scenarios and concludes both scenarios would result in a significant impact on coastal vehicular recreation lands.

Finally, the Draft Program EIR discloses the most current scientific information regarding the areas at Oceano Dunes SVRA that have the highest potential to generate dust and PM10 emissions and influence air quality measurements at the SLOAPCD's CDF monitoring station. The OHMVR Division directs the CCC to Draft Program EIR pages 1-6 to 1-7, which state, "In general, the study found that potential PM10 emissions were highest within the La Grande tract. Although the study could not explain why PM10 emissivity within the La Grande tract was the highest, it did note that factors such as sand grain size, meteorology, and topography all influence PM10 emissions (both potential and actual)." The OHMVR Division also directs the CCC to Draft Program EIR page 1-7, which states, "considering all data, i.e., temporary monitoring, PI-SWERL, and particle size data, [a] picture has emerged that generally describes the spatial variability of the PM10 emissions. The PM10 emissions measured with the PI-SWERL show a pattern that is corroborated by the temporary monitoring networks, with higher PM10 measurements [in the central to northern part of the open riding and camping area], being associated with areas that the PI-SWERL measurements have identified as having higher emission potential." Finally, the OHMVR Division directs the CCC to Draft Program EIR Section

2.3.1.1, which provides a discussion on the basis for selecting the proposed Dust Control Program area, stating, "The Program area includes most of the open sand areas in the central to northern portion of the Oceano Dunes SVRA open riding and camping area, commonly referred to as the "La Grande Tract." SLOAPCD and OHMVR Division studies have identified this area as the area most likely influencing air quality measurements at the CDF station and air quality conditions on the Nipomo Mesa."

**Comment C6:** The CCC summarizes why the Draft Program EIR "dismisses" certain alternatives, expresses disagreement that planting dune vegetation is an adverse visual impact, and expresses concern with the effectiveness and ability of the proposed dust control measures to meet program objectives.

Response to Comment C6: First, as a point of clarification, the Draft Program EIR does not simply "dismiss" certain Program alternatives. Draft Program EIR Chapter 12 includes a robust evaluation of alternatives to the proposed Program, consistent with the requirements of CEQA and the CEQA Guidelines. Section 12.1 of the Draft Program EIR provides information on how the OHMVR Division selected alternatives for consideration and evaluation in the Draft Program EIR. Section 12.2 identifies alternatives considered but rejected and, as required by CEQA, provides a brief explanation of why the alternative was rejected from further consideration. Section 12.3 of the Draft Program EIR considers two different versions of the "No Project Alternative" required by CEQA, and Section 12.4 considers an Alternate Dust Control Program recommended by the SLOAPCD. In addition, as shown in Section 3.8 of this Final Program EIR, the OHMVR Division has added an evaluation of the use of artificial wind breaks as an alternative to the proposed Dust Control Program.

Second, the CCC is correct that the Draft Program EIR concludes several alternatives are either infeasible or fail to substantially reduce and/or avoid the proposed Program's significant recreation and land use impacts; however, the CCC is incorrect that the Draft Program EIR identifies the planting of dune vegetation as an adverse visual impact. The OHMVR Division directs the CCC to the Draft Program EIR's discussion of Impact AES-1, which concludes the proposed Dust Control Program would not constitute a substantial and adverse change to the visual character and quality of Oceano Dunes SVRA. The OHMVR Division also directs the CCC to Draft Program EIR Chapter 12. The discussion of the SLOAPCD-recommended Alternate Dust Control Program (Draft Program EIR page 12-11) does state this alternative could result in new, potentially significant or significant and unavoidable impacts on aesthetics. But this is because the SLOAPCD-recommended alternative could more than double the amount of wind fencing installed at Oceano Dunes SVRA as compared to the proposed Program. Importantly, there is no alternative discussed in Draft Program EIR Chapter 12 in which the planting of dune vegetation is identified as an adverse visual impact.

Third, in regards to the CCC's comments expressing concern that wind fencing and straw bales will be of "limited effectiveness" to meet project objectives, the OHMVR Division notes:

• Draft Program EIR Section 1.1.3 summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA, including an evaluation of the effectiveness of seasonal dust control measures installed at Oceano Dunes SVRA in 2015. The study found (Draft Program EIR page 1-7), "Overall, the OHMVR Division's 2015 wind fence array reduced sand transport

within the array by 73% on average and up to 87% for areas in the interior of the array. In addition, over the three-month period the fencing was in place, the downwind concentration of PM10 at the trailing edge of the fence array was approximately 20% to 37% lower than the upwind PM10 concentration during moderate windy periods (approximately 10 to 12 miles per hour); during high wind conditions downwind concentrations were approximately 5% to 30% lower than concentrations upwind of the fence array." Thus, the OHMVR Division disagrees with the CCC that a 73% to 87% reduction in sand transport inside the fencing array is of "moderate efficacy." Furthermore, the studies showed up to a 37% reduction in PM10 concentrations immediately downwind of the fencing array (as compared to upwind concentrations), which is a substantial reduction when compared to open sand areas.

The CCC characterizes wind fencing and straw bales as having a "rapidly diminishing efficacy on PM10 control outside the arrays. In fact, their effect appears negligible, particularly as it relates to the significant problems on the Nipomo Mesa . . . . " This is not new information that changes the findings of the Draft Program EIR. The CCC is directed to Draft Program EIR Section 1.1.3, as revised by Section 3.2 of this Final Program EIR, which identifies that the 2015 dust control projects may not have reduced PM10 concentrations at the SLOAPCD CDF monitoring station<sup>6</sup>. The OHMVR Division also notes it disagrees with this broad characterization for several reasons. First, the CCC does not provide specific evidence to support its claim; however, presuming the CCC is referring to a comparison of PM10 concentrations between the downwind edge of the 2015 fencing array and the SLOACPD's CDF station, these two monitoring locations are separated by approximately 1.75 miles. In other words, there are large amounts of bare sand dunes under both private and public ownership that were located between the 2015 fencing array and the SLOAPCD CDF station. Second, the CCC's comments ignore the fact that the 2015 dust control projects achieved a 37% reduction in PM10 concentrations immediately downwind of the array, as well as the broader landscape and dune setting in which Oceano Dunes SVRA and the 2015 fencing array are located. Third, the CCC's concerns regarding whether the 40 acres of seasonal dust control measures proposed as part of the OHMVR Division's dust control program would be effective do not take into account the fact that these seasonal dust control measures are just one part of the proposed Dust Control Program – the OHMVR Division is also proposing to plant native dune vegetation (approximately 20 acres per year), which would also serve to reduce dust and PM10 downwind of Oceano Dunes SVRA.

Fourth, in regards to the CCC's comments that the installation of straw bales and fencing has led to impacts in ESHA and other concerns including from riding enthusiasts, the OHMVR Division notes these observations are not new information that change the findings of the Draft Program EIR. The CCC is directed to Draft Program EIR Section 3.2.1, which explains the OHMVR Division received written EIR scoping comments

As discussed in the response to SLOAPCD Comment D5, meteorological conditions in 2015 were anomalous. Thus, although no measurable effect on PM10 concentrations at the SLOACPD CDF station were observed, the anomalous meteorological conditions that occurred at the time limit the ability to make conclusive determinations on the effectiveness of the 2015 dust control projects.

regarding potential impacts on biological resources and OHV recreation opportunities. In addition, Draft Program EIR Section 7.3.5 acknowledges Oceano Dunes SVRA is designated ESHA by the SLO County Local Coastal Program, and the location and continued presence of dust control straw bales at Oceano Dunes SVRA are described on Draft Program EIR page 2-16 (including a passing reference to a CCC's request to remove the straw bales). The OHMVR Division notes that most straw bales installed in March 2014 have subsequently become buried or broken up and used to provide cover and support the establishment of vegetation planted in the straw bale area. Thus, the removal of straw bales is unlikely. The OHMVR Division also notes Draft Program EIR Impact BIO-4 identifies that the planting of vegetation under the Dust Control Program could result in a beneficial impact to existing dune systems, which would likely offset any impacts from removal of straw bales.

Finally, the CCC states that the proposed seasonal dust control measures would not appear to "provide significant dust control relief that might help to explain how and why those types of impacts might be allowed consistent with the Coastal Act." The proposed Dust Control Program, as described in the Draft Program EIR, represents the OHMVR Division's best approach to dust control. The proposed Program is based on the latest scientific information that has been investigated and agreed upon by the OHMVR Division and CARB and can be feasibly implemented in a reasonable timeframe with available funding, staffing, and environmental, logistical, and technical resource constraints. The OHMVR Division disagrees with the CCC that that the proposed Dust Control Program would not provide significant dust relief. The proposed Program includes dust control measures that could reduce sand transport in treatment areas by 90 percent or more, as well as reduce PM10 concentrations downwind of treatment areas by up to 37%; however, the implementation of dust control measures would have significant, adverse environmental effects. The OHMVR Division, as CEOA Lead Agency, is required to balance the proposed Program's economic, legal, social, technological, and other benefits and determine if these benefits outweigh the proposed Program's adverse environmental effects. As explained in the response to CCC Comment C2, regardless of the OHMVR Division's CEQA determination, the OHMVR Division's CDP application and the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC.

**Comment C7:** The CCC suggests the EIR consider alternative measures and combinations of measures, including vegetation planting, in select riding areas that have a predicted ability to reduce dust problems.

Response to Comment C7: Comment noted. As discussed in response to Comment C6, Draft Program EIR Chapter 12 includes a robust evaluation of alternatives to the proposed Program, including: a different dust control program location (Draft Program EIR Section 12.2.1); an accelerated Dust Control Program schedule (Draft Program EIR Section 12.2.2); OHV use restrictions (Draft Program EIR Sections 12.2.3.1 and 12.2.3.2); off-site residential filtration systems (Draft Program EIR Sections 12.2.4.1 and 12.2.4.2); two versions of the No Project Alternative (Draft Program EIR Sections 12.3.1 and 12.3.2); and an alternate dust control program recommended by the SLOAPCD. In addition, as shown in Section 3.8 of this Final Program EIR, the OHMVR Division has added an evaluation of the use of artificial wind breaks as an alternative to the proposed Dust Control Program.

The CCC does not provide any specific additional alternatives for the OHMVR Division to consider, but does agree the proposed native vegetation planting is a measure that the OHMVR Division should pursue. The OHMVR Division directs the CCC to Draft Program EIR Section 2.3.2.1, which describes the proposed vegetation plantings, and Draft Program EIR Section 2.3.4, which describes that the location of the vegetation plantings would be subject to several factors, but would ultimately occur in select areas both inside and outside of the Oceano Dunes SVRA riding area.

**Comment C8:** The CCC states riding areas are the most emissive locations at Oceano Dunes SVRA, the Draft Program EIR does not evaluate an alternative were vegetation is planted in foredunes (i.e., closer to the ocean), and the Draft Program EIR should evaluate such an alternative.

Response to Comment C8: The CCC's comments are incorrect.

First, the CCC oversimplifies and misrepresents the dynamics of dust generation at Oceano Dunes SVRA when it states "riding areas are the most emissive locations at Oceano Dunes SVRA." This characterization ignores two significant points: 1) emissions vary throughout the dune system (both riding and non-riding areas); and 2) not all parts of the dunes have been sampled. It is true that some important tests and studies have generally concluded the highest levels of dust emission potential and PM10 concentrations occur in the central to northern portion of the Oceano Dunes SVRA open riding and camping area (i.e., the La Grande tract). The Draft Program EIR (pages 1-6 and 1-7) discloses this information (see also response to Comment C-5). But, importantly, the studies conducted to date are based largely on point estimates of emissions that have varied throughout Oceano Dunes SVRA (both in time and space). The very fact that emissivity is not constant throughout the riding and camping area, nor constantly higher in riding areas than in non-riding areas<sup>7</sup>, indicates other variables besides or in addition to OHV activity are influencing dust generation at Oceano Dunes SVRA.

Second, the Draft Program EIR does evaluate an alternative where vegetation is planted in foredunes. The OHMVR Division directs the CCC to the Draft Program EIR's discussion of the SLOAPCD-recommended alternate dust control program (Draft Program EIR Section 12.4). Specifically, on Draft Program EIR pages 12-10 to 12-11, the EIR states, "The alternate dust control program would still involve planting approximately 20 acres of native dune vegetation per year; however, the planting would be emphasized in areas closer to the shore and where foredunes would be expected in the

<sup>&</sup>lt;sup>7</sup> For example, Table 2 from the Desert Research Institute's July 2015 report, "2013 Intensive Wind Erodibility Measurements at and near Oceano Dunes State Vehicular Recreation Area: Preliminary Report of Findings" shows the eastern part of the Oceano Dunes SVRA open riding and camping area has an emissions potential that is similar to and in some cases lower than the Dune Preserve. Furthermore, this report notes that factors such as topography and wind gradient must be considered, and states (page 7), "For example, there appears to be a gradient in wind strength (e.g., gusts or short-term averages during high wind events) from the North to the South (Gillies and Etyemezian, 2014). This may be one of the reasons that although the potential for PM10 emissions in the riding areas is several fold (see Table 2) the potential from non-riding areas, concentrations of PM10 at Oso Flaco during high wind events are comparable to or even higher than concentrations along the La Grande riding area for the same wind storms (Gillies and Etyemezian, 2014). Refer also to the response to SLOAPCD Comment D5 (see Section 4.4 of this Final Program EIR).

absence of vehicular recreation." The Draft Program EIR then goes on to conclude (page 12-11), "The alternate dust control program could also result in direct and/or indirect impacts on biological resources because the emphasis on planting vegetation in near-shore areas would likely modify, to some degree, USFWS-designated critical habitat for the western snowy plover (federal-listed as threatened). Planting vegetation in this critical habitat area could impact active nests by providing habitat for predators to hide and stalk nesting western snowy plovers and California least terns (federal- and state-listed as threatened). The proposed Dust Control Program largely avoids this impact by setting back the Program area at least 1,100 feet from the mean high tide line and avoiding USFWS critical habitat areas." Thus, the Draft Program EIR has already evaluated planting vegetation closer to the ocean and no additional evaluation is necessary.

**Comment C9:** The CCC states it is important to understand dust control options as it evaluates "whatever becomes Parks' proposed CDP application project in the future."

Response to Comment C9: This comment does not pertain to a specific part of the Draft Program EIR; however, the OHMVR Division submitted a CDP application to the CCC, Central Coast District, in November 2012. The CCC has indicated the Dust Control Program EIR is an important component of that application. This Final Program EIR does not substantially revise the proposed Dust Control Program as described in the Draft Program EIR. Thus, while the OHMVR Division looks forward to continued coordination with the CCC, it does not anticipate changing its proposed Dust Control Program and CDP application at this time. Accordingly, the CCC will be considering the Dust Control Program as described in this EIR and the OHMVR Division's CDP application.

**Comment C10:** The CCC states it is not clear what the OHMVR Division proposes to do if the monitoring activities show the Dust Control Program does not meet Rule 1001 requirements and suggests the Draft Program EIR include an adaptation strategy for such a scenario, complete with triggers related to monitoring data.

Response to Comment C10: While the CCC is correct that the Draft Program EIR does not outline a full and complete "adaptation strategy," the OHMVR Division notes:

- As described in response to Comment C-4, there is uncertainty surrounding the magnitude of dust control measures needed to comply with the Rule 1001 performance standard. This uncertainty is a major reason why the OHMVR Division established clear, yet flexible objectives for the proposed Program that do not preclude achieving compliance with the rule performance standards. This uncertainty is also a major reason why the OHMVR Division prepared a Program EIR that evaluates several different types of dust control measures throughout more than one square mile of land at and near Oceano Dunes SVRA.
- The Draft Program EIR describes the proposed Dust Control Program, in part, as an "iterative series of dust control activities that would be evaluated and revised as necessary to meet goals set by the OHMVR Division, SLOAPCD, and CARB ... (Draft Program EIR page 2-1)." Thus, the Draft Program EIR does anticipate that the relative success of the proposed Dust Control Program would be evaluated and, if necessary, revised and improved over time. Initially, the OHMVR Division anticipates such revisions would consist of changing the location of seasonal dust control measures or vegetation plantings and identifying the most effective patterns for seasonal dust control arrays (e.g., increased

density of fencing, combined porous roughness elements and fencing arrays, etc.). Thus, the proposed Program implements controls, measures success, and adapts methods based on measured results, which is the standard adaptive management approach.

• Draft Program EIR Section 2.4.1, as revised by Section 3.3 of this Final Program EIR, describes an annual review process consisting of planning, resource evaluation, agency reporting and review, and implementation steps. As part of this process, the OHMVR Division would evaluate potential projects for consistency with the Dust Control Program EIR and CDP conditions, and coordinate with the APCD on final planned activities. Thus, the annual review process allows for the OHMVR Division and other agencies to adapt the previous year's dust control strategies if and when such adaption is determined necessary.

As explained above, the proposed dust control measures include an iterative series of activities, subject to annual review, that would involve expanded vegetation planting activities as necessary to continue to make best possible progress towards the Rule 1001 performance standard. Thus, although the Draft Program EIR does not explicitly describe an adaptation strategy, many strategies common to the adaptive management process (e.g., iterative progress, annual review) are inherently part of the proposed Program.

Comment C11: The CCC summarizes Draft Program EIR information on potential recreation impacts, states they are "strong supporters" of coastal recreation, and comments it is premature for the Draft Program EIR to draw even preliminary Coastal Act conclusions. The CCC goes on to state the Draft Program EIR needs to identify the impacts associated with the proposed program and alternatives to it, and strongly suggests the Draft Program EIR's conclusions regarding the California Coastal Act be eliminated, particularly any conclusions that rely on a threshold of significant "designed to disallow any reduction of OHV riding area."

Response to Comment C11: The CCC's summary of Draft Program EIR information on potential recreation impacts is generally accurate; however, the CCC's comments ignore the OHMVR Division's obligation under CEQA to evaluate all potentially significant direct, indirect, and cumulative impacts of the proposed program and misinterpret the significance threshold the OHMVR Division has used to evaluate potential recreation impacts.

The OHMVR Division disagrees that it is premature for the Draft Program EIR to draw preliminary conclusions on the proposed Dust Control Program's consistency with the Coastal Act. As described on page 1-1 of the Draft Program EIR, the OHMVR Division prepared the Draft Program EIR "to evaluate the potentially significant environmental impacts that may result from the Oceano Dunes SVRA Dust Control Program." Accordingly, the Draft Program EIR was prepared in accordance with CEQA and the CEQA Guidelines (Draft Program EIR page 1-10), informs decision makers of the proposed Program's potential for significant effects, including possible ways to minimize those effects, and describes reasonable alternatives to the proposed Program (see also response to Comment C2, C6, and C7). The Draft Program EIR, therefore, discloses the OHMVR Division has applied for a Master CDP from the CCC, Central Coast District (page 1-12), identifies the CCC as a CEQA responsible agency (page 2-43), and summarizes information pertaining to the legislative findings and declarations, goals, definitions, and specific development policies of the Coastal Act (Section 5.2.1). Furthermore, Draft Program EIR Section 5.3.1 clearly identifies that, according to

Appendix G of the CEQA Guidelines, the proposed program would have a significant effect on land use if it would "conflict with any plan, policy, or regulation of an agency with jurisdiction over the project . . . adopted for the purposes of avoiding or mitigating an environmental impact." Thus, under CEQA, the OHMVR Division is required to consider the proposed Program's consistency with the Coastal Act. This is no different than analyzing a non-coastal development project for consistency with a local general plan. While the Draft Program EIR does present the OHMVR Division's evaluation (as CEQA Lead Agency) on the proposed Program's consistency with the Coastal Act, the Draft Program EIR is clear that the CCC has the final determination regarding the proposed Program's consistency with the Coastal Act. The OHMVR directs the CCC to Draft Program EIR page 5-18, which states, "The CCC may determine the Dust Control Program, as described in this EIR, is consistent with the Coastal Act and/or impose additional conditions on the Program as necessary to support its issuance of a CDP and the Program's conformance with the Coastal Act."

In addition, as a point of clarification, the Draft Program EIR's evaluation of potential recreation impacts is not based on a significance threshold that is designed to "disallow any" reduction in riding area. The OHMVR Division directs the CCC to Draft Program EIR page 4-20, which states, the OHMVR Division has determined the proposed Program would have a significant impact related to recreation and public access if it would (emphasis added) "Substantially limit, reduce, or interfere with established coastal recreational opportunities at Oceano Dunes SVRA." This significance threshold does not imply "any" loss or reduction in riding area is significant. Rather, it implies the loss must be substantial within the parameters defined on Draft Program EIR pages 4-20 to 4-21.

Comment C12: The CCC reiterates previous remarks that OHV riding is not coastal dependent, cites the definition of "coastal-dependent development or use" contained in Public Resources Code Section 30101, and states (emphasis added), "While there are some recreational activities that could constitute coastal dependent activities at [Oceano Dunes SVRA] (e.g., surfing, *surf* fishing, *ocean* swimming, kite boarding, kayaking, etc.), OHV use and camping are not two of them.

Response to Comment C12: The CCC is correct that the Draft Program EIR (page 4-11) states that the OHMVR Division considers beach and dune-oriented recreational opportunities to be coastal-dependent recreation activities within the context of the California Coastal Act. The OHMVR Division did not consider the Coastal Act status (i.e., coastal-dependent, coastal-related, or no status at all) of the recreational opportunities available at Pismo State Beach and Oceano Dunes SVRA as a factor in determining the significance of Draft Program EIR Impacts REC-1 and REC-2. This is because the OHMVR Division does not have jurisdiction with regards to the Coastal Act and only the CCC can determine the proposed Dust Control Program's consistency with the Coastal Act (see also response to Comment C2). Rather, the OHMVR Division evaluated the significance of Impact REC-1 and Impact REC-2 using a combination of factors including, but not limited to, the site's history, visitation, and ability to find similar recreational opportunities (see Draft Program EIR Section 4.3.1). The OHMVR Division also directs the CCC to Draft Program EIR page 5-18, as revised by this Final Program EIR (see Section 3.5), which acknowledges the CCC is the entity responsible for determining consistency with the Coastal Act.

As shown in Section 3.4 of this Final Program EIR, the OHMVR Division has revised the discussion on page 4-11 of the Draft EIR to indicate camping and OHV recreation at

Pismo State Beach and Oceano Dunes SVRA may not be considered coastal-dependent development by the CCC. Nonetheless, the OHMVR Division notes:

- Public Resources Code (PRC) section 5019.56 states "State recreation units consist of areas selected, developed, and operated to provide outdoor recreational opportunities . . . state recreation units may be established in the terrestrial or nonmarine aquatic (lake or stream) environments of the state . . . ." In addition, pursuant to PRC Section 5019.56(a), state recreation areas consist of areas "selected and developed to provide multiple recreational opportunities to meet other than purely local needs. The areas shall be selected for their having terrain capable of withstanding extensive human impact and for their proximity to large population centers, major routes of travel, or proven recreational resources such as manmade or natural bodies of water." Furthermore, PRC Section 5019.56(c) defines a state beach as (emphasis added), "areas with frontage on the ocean, or bays designed to provide swimming, boating, fishing, and other beach-oriented recreational activities." Thus, as explained on Draft Program EIR page 4-11, categorizing beach and coastal dune camping and vehicular recreation at Pismo State Beach and Oceano Dunes SVRA as coastal-dependent would seem appropriate since, by definition, these parks provide a unique place to camp and recreate with vehicles that is not available elsewhere. In other words, beach camping requires a beach and coastal dune vehicular recreation requires a coastal dune system to be able to occur at all.
- In its comments, CCC staff provide several examples of activities that could constitute coastal-dependent recreation. The examples provided by CCC staff appear to make a clear distinction between "surf fishing" and non-surf fishing and "ocean swimming" and non-ocean swimming. This would indicate it could also be appropriate to distinguish beach camping from inland camping opportunities and coastal dune vehicular recreation from inland vehicular recreation opportunities. CCC staff also list kite boarding and kayaking as examples of coastal-dependent recreation. Both of these activities are known to occur on rivers (e.g., the Sacramento River delta) and lakes (e.g., Lake Tahoe) throughout California. Thus, it is not clear to the OHMVR Division how CCC staff consider these descriptive examples to "require a site on or adjacent to the sea to be able to function at all."

Comment C13: The CCC summarizes Draft Program EIR information on the factors that would generally guide where the OHMVR Division could potentially plant vegetation and deploy seasonal dust control measure, notes the Draft Program EIR cites Stenzel et al. 1981 as a reference regarding western snowy plover nesting locations, and states it is not clear that planting vegetation in a portion of the foredunes would interfere with plover nesting sites. The CCC also requests the Draft Program EIR be supplemented with additional information on nesting needs, particularly as it relates to the effect of potential vegetation planting.

Response to Comment C13: Comment noted. Section 2.1 of this Final EIR provides additional information on western snowy plover and California least tern nesting requirements, including as it relates to the effect of potential vegetation planting. As stated in the Draft Program EIR Section 7.2.2.2 (pages 7-14 and 7-15), the Program area would avoid any active western snowy plover and California least tern nesting areas. See also the response to Friends of Oceano Dunes Comment K65 in Section 4.11 of this Final Program EIR.

Comment C14: The CCC notes the Draft Program EIR describes the proposed Dust Control Program area as a 690-acre tract of land, of which 113 acres is "ascribed" for dust control. The CCC states it is "misleading" to describe the proposed Dust Control Program this way and requests the OHMVR Division refine and update the acreage description to account for various types of uses within the park, such as riding and non-riding areas, and their relation to the proposed Program.

Response to Comment C14: Comment noted. The CCC does not specifically state what is "misleading" about the Draft Program EIR's project description (Draft Program EIR Chapter 2). The Draft Program EIR clearly articulates the proposed Dust Control Program area, features, and implementation scenarios. The OHMVR directs the CCC to Draft Program EIR Section 2.2, which provides an overview of Oceano Dunes SVRA and Pismo State Beach. Specifically, information on recreational opportunities, including the size (in acres) and location of riding and non-riding areas is discussed in Draft Program EIR Section 2.2.4, presented in Draft Program EIR Table 2-1, and depicted graphically in Draft Program EIR Figures 2-2 and 2-5. Furthermore, Draft Program EIR Section 2.3.1 describes the proposed Dust Control Program area (845 acres total), and Draft Program EIR Section 2.3.4 and Table 2-3 discuss the potential changes in land use / land occupancy within the Dust Control Program area that could under the proposed Program.

**Comment C15:** The CCC states it believes the Draft Program EIR needs to be significantly updated to serve the needs of the CCC related to the OHMVR Division's pending CDP application, specifically the Draft Program EIR's project description, objectives, and alternatives.

Response to Comment C15: Comment noted. The OHMVR Division has previously responded to the CCC's comments regarding the Draft Program EIR's project description (see response to Comment C4, C5, C10, and C14), objectives (see response to Comment C4, C5, and C10), and alternatives (see response to Comment C6, C7, and C8). Comment C15 does not raise any additional, specific comments that warrant a response from the OHMVR Division.

Comment C16: The CCC notes it has worked closely with the OHMVR Division on dust control efforts and expresses a desire to continue to work with the OHMVR Division on the review of the OHMVR Division's CDP application and to "abate wind-borne and other dust" associated with Oceano Dunes SVRA.

Response to Comment C16: Comment noted. The OHMVR Division appreciates CCC staff efforts to facilitate effective dust control projects at Oceano Dunes SVRA and looks forward to continuing to work with CCC staff on the proposed Dust Control Program's CDP application. As a point of clarification, the proposed Program applies to indirect sources of dust at Oceano Dunes SVRA only; it does not address other dust emissions sources.



## **COMMENT LETTER "D"**

October 3, 2016

Ronnie Glick, Senior Environmental Scientist
California Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division, Oceano Dunes District
340 James Way, Suite 270
Pismo Beach, CA 93449

SUBJECT: Comments on the Draft Program Environmental Impact Report (State

Clearinghouse #2012121008) for the Oceano Dunes State Vehicular Recreation

Area Dust Control Program

Dear Mr. Glick:

This letter provides our comments on the August 2016 Draft Program Environmental Impact Report (DEIR) for the proposed Oceano Dunes State Vehicular Recreation Area (ODSVRA) Dust Control Program. Please note that most of the comments from our last letter on the February 6, 2015 Notice of Preparation (NOP) have not been addressed in this DEIR. That letter is attached for your reference and should be included and responded to as part of our current comments on this DEIR.

D1

Of most importance, the EIR does not quantify the emission reductions needed to meet the requirements of San Luis Obispo County Air Pollution Control District (APCD) Rule 1001 Particulate Matter Reduction Plan (PMRP), nor does it quantify the emission reductions the proposed measures will achieve. We realize that the modeling to quantify the emission reductions needed to meet Rule 1001 and help precisely locate the areas where mitigation will be most effective is currently being prepared with the help of the Air Resources Board. We also realize that litigation has created pressure to prepare an EIR for the temporary projects that have been occurring seasonally. With these things in mind, it is the District's position the EIR will need to be substantially revised or a subsequent EIR prepared in the near future to address the new Plan that must be developed and adopted to meet the requirements of Rule 1001 based on the modeling results. Creation of the new plan and associated environmental review must occur as soon as the modeling is completed.

D2

For this current EIR, the following issues should be addressed:

 The purpose of the project as stated on Page 1-1 is: "to control and minimize dust and particulate matter (PM) emissions that are generated under strong wind conditions and subsequently transported downwind of Oceano Dunes SVRA". This is inconsistent with the requirements of Rule 1001, which is the primary driver for all dust mitigation projects proposed at the ODSVRA. Thus, the primary purpose of this project should be to comply with the emission reduction requirements of APCD Rule 1001. The Rule requires preparing and implementing an APCD-approved PMRP that ensures anytime the 24-hour average PM10 concentration measured downwind of the riding area exceeds 55 ug/m³, it is no more than 20% above the 24-hour average PM10 concentration measured downwind of a comparable non-riding area. The proposed 5-year project plan described in this EIR does not meet that requirement and cannot be approved by APCD.

D3

**D4** 

D5

D6

D7

- The proposed setback of 1,100 to 1,500 feet from the shoreline in the La Grande tract should be eliminated because it excludes from dust controls some of the highest particulate emission zones identified in the OHMVR Division studies listed on Page 1-6. (See Attachment 1, below)
- On page 1-7 under the Dust Control Project ODSVRA 2016 (DRI 2015c) heading, the following statement is made: "Despite reductions immediately downwind of the fencing array, a preliminary SLOAPCD analysis has indicated that the 2015 seasonal dust control measures may not have been effective at reducing PM10 levels at the SLOAPCD's CDF station; however, this preliminary finding may due to anomalous meteorological conditions in 2015, particularly in May 2015 (Zeldin and Tupper 2015)." e. Our findings indicated that an anomalous meteorological year with much lower wind speeds than normal was likely responsible for reducing PM10 levels at our CDF site and elsewhere on the Mesa. That finding is no longer preliminary and is documented in our 2015 Annual Air Quality Report available on our website. Please make this correction in the Final EIR.
- On page 1-7 the following statement is made: ".... the OHMVR Division and the SLOAPCD, together with CARB, have reached a general consensus on an approach to dust control at Oceano Dunes SVRA that is reflected in, and forms the basis for, the proposed Oceano Dunes Dust Control Program." This statement should be deleted from the Final EIR. The OHMVR Division developed this proposed project independently as part of the NOP process, with no input from APCD or ARB. The APCD expressed its strong concerns regarding the inadequacy of this proposal in its comments on the NOP (See Attachment 2). As a result, OHMVR suggested that APCD present an alternative project for analysis in the EIR. The APCD-recommended project is described and minimally evaluated in Section 12.4 of this document.
- On Page 2-1, OHMVR has misinterpreted the stated goals of the Consent Decree Agreement, as defined in the phrase: "... to achieve an immediate goal of meeting the Federal PM10 standard at the monitor located on the Nipoma Mesa known as CDF and to provide ongoing progress toward achieving the State PM10 standards and meet the standards set forth in Rule 1001." This statement consists of 3 separate and independent clauses: to immediately attain the Federal PM10 standard; to make ongoing progress toward attaining the State PM10 standards; and meet the standards set forth in Rule 1001. Meeting the standards set forth

Oceano Dunes State Vehicular Recreation Area Dust Control Program August 2016 Draft EIR October 3, 2016 Page 3 of 5

in Rule 1001 will not achieve the State PM10 standards, which are substantially more stringent than the performance standard in the Rule. As such, the consent decree agreement defines compliance as "...meet(ing) the standards set forth in Rule 1001", not as "ongoing and best possible progress towards compliance with SLOAPCD Rule 1001 performance standard", as OHMVR states in Section 2.1. Thus, the goals of this project need to be redefined to describe how the project will actually comply with Rule 1001, not "ongoing progress towards compliance".

D7

 The DEIR identifies three potentially unavoidable significant impacts from the proposed project, each of which is based on subjective interpretation of CEQA and the California Coastal Act, as described below.

D8

o Impact REC 1: The Dust Control Program would limit and interfere with coastal vehicular recreation opportunities at Oceana Dunes SVRA. This identified impact is based on OHMVR's creation of their own significance threshold for impacts to Recreation that is found only in this document and goes beyond what is defined in the CEQA guidelines. As stated on Page 4-20, Section 4.3.1, OHMVR has created the following criterion for defining a significant impact: "In addition, the OHMVR Division." has determined the project would have a significant environmental impact related to recreation and public access in the project area if it would: Substantially limit, reduce, or interfere with established coastal recreational opportunities at Oceano Dunes SVRA". This self-defined "qualitative threshold" is then used as the basis for determining the proposed project would create a significant impact to Recreation that must be mitigated because it would temporarily or permanently reduce the size of the riding area by 78 to 113 acres (a 5.3 to 7.7% loss of riding acreage). The proposed mitigation is to move the most effective dust control measure available, the planting of vegetation, to outside the open riding and camping areas in the least emissive areas of park.

**D**9

This mitigation is inconsistent with the goals of the project and the requirements of Rule 1001 and should be eliminated from consideration. No area should be excluded from consideration of dust controls without clear scientific justification that conclusively demonstrates controls in that area are not necessary to achieve the performance standard in Rule 1001.

D10

Impact LUP-1: The Dust Control Program would conflict with the Pismo Dunes SVRA (now Oceano Dunes SVRA) General Development Plan and Resource Management Plan. Impact LUP-1 identifies the loss of up to 78 to 113 acres of land inside the ODSVRA as a significant conflict with the Oceano Dunes SVRA General Development Plan and Resource Management Plan because "it would not perpetuate and enhance recreational use of OHVs in the SVRA", one of the stated goals in that plan. This subjective determination and resulting mitigation recommendation has no quantitative basis and results in focusing dust controls away from areas where they

Oceano Dunes State Vehicular Recreation Area Dust Control Program August 2016 Draft EIR October 3, 2016 Page 4 of 5

can be most effective; this is inconsistent with the requirements of Rule 1001. This creates a conflict between the legal requirement to protect public health through compliance with Rule 1001 and the stated goal in your Plan. Thus, if the 5.3 to 7.7% reduction in riding area acreage is deemed inconsistent with your Plan, it may be necessary to update the plan to reflect the requirements of Rule 1001.

**D10** 

Impact LUP-2: The Dust Control Program could conflict with the California Coastal Act. The California Coastal Act defines "coastal-dependent development or use" to mean any development or use which requires a site on, or adjacent to, the sea to be able to function at all (PRC §30101). OHMVR has modified that definition in this EIR to include off-highway vehicle recreation at the ODSVRA as a coastal dependent use. This expansion of the Coastal Act definition is then used as the basis for several determinations in Chapter 5, Table 5-1 identifying the dust control project as inconsistent with Coastal Act Planning and Management Policies because it would interfere with OHV activity on the dunes. The California Coastal Commission should be asked to make a determination as to the appropriateness and applicability of OHMVR's new interpretation and expansion of the Coastal Act definition of a coastal-dependent use.

D11

• In section 12.2.3, the EIR discusses the potential voluntarily implementation of restrictions on the acreage within Oceano Dunes SVRA open to vehicular recreation and concludes this alternative would not be as effective as vegetation or wind fencing and straw bales. While we agree that vegetation is the most effective dust control measure available by far, temporary or permanent restriction of some areas to riding has been documented in OHMVRs own studies to significantly reduce sand transport within those areas. The 2013 Intensive Wind Erodibility Measurements at and Near the Oceano Dunes State Vehicular Recreation Area: Report of Findings (DRI 2015a) conducted by OHMVR showed that sand transport within the snowy plover exclosure during the period closed to riding was comparable to that measured in the permanent nonriding areas, which measured 5 to 8 times less emissive for PM10 than measured in the riding areas.

D12

• In the APCD proposed Alternate Control Program discussed in Section 12.4, the same potentially significant impacts are identified as for the Proposed Project. One additional potential impact identified for the APCD proposal is the potential modification of USPWS-designated critical habitat for the western snowy plover due to recommended reestablishment of vegetated foredunes in the near shore areas of the La Grande tract. However, this same near shore area is currently subject to high density camping and significant OHV activity throughout the year. Please explain how a series of vegetated foredunes in this area would have a more significant impact on snowy plover habitat than the current use of that area.

**D13** 

In conclusion, the proposed Project cannot be unconditionally approved by APCD as meeting the PMRP because the EIR does not show how the proposed measures are adequate to meet Rule 1001.

D14

Oceano Dunes State Vehicular Recreation Area Dust Control Program August 2016 Draft EIR October 3, 2016 Page 5 of 5

Because a revised or subsequent project description and EIR will need to be drafted after the modeling is completed, we have limited the current scope of our comments to the larger issues listed above that will also need to be addressed in the new EIR.

Thank you for the opportunity to provide input to this important process. Please feel free to contact me if you have any questions or need additional clarification on these comments.

Respectfully,

Gary E. Willey

M 5 Willey Manager, Engineering and Compliance Division

GEW/lmg

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## 4.4 RESPONSE TO COMMENTS FROM THE SLOAPCD

The OHMVR Division received 14 comments from Gary Willey, Manager, Engineering Division, San Luis Obispo County Air Pollution Control District (SLOAPCD). In general, these comments pertain to the Draft Program EIR's project description, objectives, thresholds of significance, impact analyses, and alternatives.

**Comment D1:** The SLOAPCD notes it previously provided comments on the OHMVR Division's February 2015 Revised Notice of Preparation (NOP). The SLOAPCD indicates the Draft Program EIR did not address most of the SLOAPCD comments submitted on the Revised NOP, and provides the same comment letter on the Draft Program EIR.

Response to Comment D1: The SLOAPCD has re-submitted its comments on the Revised NOP prepared for the EIR dated March 9, 2015. In its comments, the SLOAPCD generally recommended: the intent of the proposed Program should be to comply with Rule 1001; the proposed Program area should not be limited unless there is scientific evidence or document for doing so; the proposed Program's dust control measures should be sufficient to achieve compliance with the Rule 1001 performance standard; the EIR should be clear on whether planting activities would be specific to dust control; the EIR should include an analysis of reestablishing vegetated foredunes at Oceano Dunes SVRA; and the EIR should evaluate the use of soil binders in near shore high emissive areas.

The SLOAPCD does not specifically identify which of its previously submitted comments were not addressed in the EIR. The OHMVR Division, therefore, cannot provide a specific, detailed response to Comment D1. Nonetheless, the OHMVR Division notes:

- The proposed Program objectives are described in Draft Program EIR Section 2.1 and include, but are not limited to, making ongoing and best possible progress towards compliance with Rule 1001. As explained in the response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), it is currently not possible for the OHMVR Division or any other agency, including the SLOAPCD, to definitively and conclusively identify what magnitude of dust control is necessary to achieve compliance with the Rule 1001 performance standard. The uncertainty surrounding the magnitude of dust control measures needed to comply with the Rule 1001 performance standard is a major reason why the OHMVR Division set forth clear and flexible objectives for the proposed Program that do not preclude compliance with Rule 1001, enable consideration of a reasonable range of alternatives, and balance public safety, recreation, and natural resources considerations. Please refer to the response to SLOAPCD Comments D2 and D3 for additional information regarding this topic.
- The basis for the proposed Program area is described in Draft Program EIR Sections 1.1.3 and 2.3.1. As explained in the response to CCC Comment C5 (see Section 4.3 of this Final Program EIR), the Draft Program EIR discloses the most current scientific information regarding dust emission potential at Oceano Dunes SVRA and provides a discussion of scientific and environmental factors that provide the basis for the proposed Dust Control Program area. Please refer to the response to SLOAPCD Comments D2, D3, D4, D9, D12, and D13 for additional information regarding this topic.

- Rule 1001 is described in Draft Program EIR Section 1.1.4. As explained in the
  response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), as
  well as the first bullet point above, it is currently not possible for the OHMVR
  Division or any other agency, including the SLOAPCD, to definitively and
  conclusively identify what magnitude of dust control is necessary to achieve
  compliance with the Rule 1001 performance standard.
- The proposed Program's planting activities are described in Draft Program EIR Section 2.3.2.1 and are in addition to ongoing planting activities conducted by OHMVR Division staff (which are described in Draft Program EIR Section 2.2.6.1) The OHMVR Division directs the SLOAPCD to the Draft Program EIR's discussion of cumulative impacts on page 11-4, which states, "The Dust Control Program-related activities are in addition to ongoing cultural and biological resource management at Oceano Dunes SVRA (e.g., seasonal plover exclosure, planting 15 acres of vegetation per year, expansion of cultural resources protection areas), as well other projects in the vicinity of Pismo State Beach and Oceano Dunes SVRA."
- The establishment of foredune vegetation is evaluated in the Draft Program EIR. The OHMVR Division directs the SLOAPCD to the Draft Program EIR's discussion of the SLOAPCD-recommended alternate dust control program (Draft Program EIR Section 12.4). Specifically, on Draft Program EIR pages 12-10 to 12-11, the EIR states, "The alternate dust control program would still involve planting approximately 20 acres of native dune vegetation per year; however, the planting would be emphasized in areas closer to the shore and where foredunes would be expected in the absence of vehicular recreation." Please refer to also the response to SLOAPCD Comments D4, D12, and D13 for additional information on this topic.
- Soil binders are described in Draft Program EIR Section 2.3.2.4 and evaluated as necessary in Chapters 4 through 11 of the Draft Program EIR.

**Comment D2:** The SLOAPCD notes the EIR does not quantify the level of emission reductions needed to meet the requirements of SLOAPCD Rule 1001, nor does it quantify the emission reductions the proposed measures will achieve. The SLOAPCD states that modeling to quantify the emission reductions needed to meet Rule 1001 and help precisely located the areas where dust control measures would be most effectives is "currently being prepared" with the help of CARB. Finally, the SLOAPCD notes it is the SLOAPCD's position that the Draft Program EIR will need to be substantially revised or a subsequent EIR prepared to address the results of the modeling.

Response to Comment D2: Comment noted. The SLOAPCD is correct that the Draft Program EIR does not quantify the level of emission reductions needed to meet the requirements of SLOAPCD Rule 1001, nor does it quantify the emission reductions the proposed dust control measures would achieve. As explained in the response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), it is currently not possible for the OHMVR Division or any other agency, including the SLOAPCD, to definitively and conclusively identify what magnitude of dust control is necessary to achieve compliance with the Rule 1001 performance standard. The SLOAPCD acknowledges that the OHMVR Division, the SLOAPCD, and CARB are currently in the preliminary stages of undertaking a modeling exercise that may inform the location and magnitude of dust

control measures installed at Oceano Dunes SVRA; however, as described in Section 2.2 of this Final Program EIR, this exercise is still only in its preliminary stages.

The OHMVR Division directs the SLOAPCD to page 1-11 of the Draft Program EIR, which explains the OHMVR Division is required (pursuant to CEQA) to consider subsequent dust control activities against the scope and content of the Program EIR. Specifically, page 1-11 states, "In accordance with CEQA Guidelines Section 15168(c), if dust control activities implemented later under this Program EIR are within the scope of this Program EIR, no further CEOA review is necessary. If the OHMVR Division determines the later activity would have effects that were not examined in this Program EIR, it would evaluate potential impacts under PRC Section 21166, which only requires subsequent CEQA review in certain circumstances. Any feasible mitigation measures or alternatives developed in this Program EIR must also be included in the subsequent activity." While the OHMVR Division acknowledges that subsequent environmental review of dust control projects is required under CEQA, it is premature to speculate on the type and level of additional CEQA review that would be required to address the results of the modeling program. The OHMVR Division would review and evaluate the results of this modeling program to see if they fit within the scope of the Dust Control Program EIR when it is appropriate to do so (e.g., when the modeling is complete to the satisfaction of the OHMVR Division, SLOAPCD, and CARB).

**Comment D3:** The SLOAPCD cites introductory text from the Draft Program EIR and states the text is inconsistent with the requirements of Rule 1001. The SLOAPCD also states the proposed Dust Control Program does not meet the requirements of Rule 1001 and cannot be approved by the SLOAPCD.

Response to Comment D3: The OHMVR Division disagrees with the SLOAPCD's remarks. First, the text from page 1-1 of the Draft Program EIR provides an introductory explanation of the proposed Dust Control Program that is consistent with Rule 1001. Specifically, Draft Program EIR page 1-1 states the proposed Dust Control Program "is intended to control and minimize dust and particulate matter (PM) emissions that are generated under strong wind conditions and subsequently transported down wind of Oceano Dunes SVRA . . . ." This description is consistent with SLOAPCD Regulation X, Fugitive Dust Emission Standards, Limitations and Prohibitions, Rule 1001, Coastal Dunes Dust Control Requirements Section C.2 , which requires the OHMVR Division to "minimize PM10 emissions for the area under the control" of the OHMVR Division.

Second, the SLOAPCD does not provide any specific facts to support its assertion that the proposed Dust Control Program does not meet the requirements of Rule 1001. As the OHMVR Division has previously noted, it is true the Draft Program EIR does not explicitly state whether or not the proposed Dust Control Program would meet the performance standard established by Rule 1001 (see the responses to CCC Comment C4 in Section 4.3 of this Final Program EIR and SLOAPCD Comment D2 above). But this is because it is not possible for the OHMVR Division or any other agency, including the SLOAPCD, to definitively and conclusively identify what magnitude of dust control is necessary to achieve compliance with the Rule 1001 performance standard. The uncertainty surrounding the magnitude of dust control measures needed to comply with the Rule 1001 performance standard is a major reason why the OHMVR Division has set forth clear and flexible objectives for the proposed Program (e.g., see Draft EIR page 2-1, objective 3, to "make ongoing and best possible progress toward compliance with SLOAPCD Rule 1001 performance standard"). Importantly, the clear and flexible

objectives set for the proposed Program do not preclude achieving compliance with the Rule 1001 performance standard, and it is possible that the planting of approximately 100 acres of vegetation and the deployment of 40 acres of wind fencing could achieve compliance with the Rule 1001 performance standard.

Finally, as a point of clarification, the Draft Program EIR does not identify the SLOAPCD as a Responsible Agency under CEQA, and the SLOAPCD has no authority to "approve" or deny the proposed Dust Control Program as described in the OHMVR Division's EIR.

**Comment D4:** The SLOAPCD states the OHMVR Division's proposed setback from the shoreline should be eliminated because it excludes some of the highest particulate emission zones identified in studies to date.

*Response to Comment D4:* Comment noted. The OHMVR Division, however, disagrees with the SLOAPCD for the following reasons:

- The SLOAPCD has attached Figure 5 from the report titled "2013 Intensive Wind Erodibility Measurements at and near Oceano Dunes State Vehicular Recreation Area: Preliminary Report of Findings." This report does not constitute new information. The OHMVR Division directs the SLOAPCD to Draft Program EIR Section 1.1.3, which contains a summary of this report. Specifically, in regards to this report, the Draft Program EIR states (pages 1-6 to 1-7), "This OHMVR Division study evaluated differences in emissivity throughout Oceano Dunes SVRA and Pismo State Beach by utilizing a small, portable device that simulates wind shear on the dune surface (the Portable In-Situ Wind Erosion Lab, or PI-SWERL®). In general, the study found that potential PM10 emissions were highest within the La Grande tract. Although the study could not explain why PM10 emissivity within the La Grande tract was the highest, it did note that factors such as sand grain size, meteorology, and topography all influence PM10 emissions (both potential and actual)."
- The figure referenced by the SLOAPCD shows potential emissions at specific points (not areas) throughout Oceano Dunes SVRA when shear stress levels on the dune surface are equal to wind conditions of approximately 23 miles per hour. In general, brown and yellow points are less emissive and green and blue points are more emissive. The referenced figure clearly shows most, but not all, of the green and blue dots are present in the central and northern part of the SVRA. This is consistent with the information presented on page 1-7 of the Draft Program EIR, which states, "considering all data, i.e., temporary monitoring, PI-SWERL, and particle size data, [a] picture has emerged that generally describes the spatial variability of the PM10 emissions. The PM10 emissions measured with the PI-SWERL show a pattern that is corroborated by the temporary monitoring networks, with higher PM10 measurements [in the central to northern part of the open riding and camping area], being associated with areas that the PI-SWERL measurements have identified as having higher emission potential."
- The Draft Program EIR is clear that the western boundary of the proposed Dust Control Program area is setback from the Pacific Ocean's mean high tide line because this is the area where most beach-front recreation occurs, as well as where most western snowy plover habitat exists. As explained in more detail in Section 2.1 of this Final Program EIR, the USFWS has determined this area

contains the physical and biological features essential for the conservation of western snowy plover. Modification of this habitat could result in significant impacts to this federally-listed species and the need to obtain a permit from the USFWS.

Thus, as explained above, the OHMVR Division's proposed Dust Control Program area captures most of the area that studies have identified as having a higher emission potential and which lack known special-status species and other resources which, if impacted by the project, could require additional permitting and review requirements that would substantially delay implementation of the proposed Program. The SLOAPCD does not provide any new, specific information that requires the OHMVR Division to change the proposed Dust Control Program area.

**Comment D5:** The SLOAPCD requests the OHMVR Division revise text on Draft Program EIR page 1-7 to reflect findings presented in its 2015 Annual Air Quality Report.

Response to Comment D5: The SLOAPCD released its 2015 Annual Air Quality Report in September 2016, after the OHMVR Division released the Draft Program EIR (August 2016). As shown in Section 3.2 of this Final Program EIR, the OHMVR Division has revised the text on Draft Program EIR page 1-7 pertaining to the SLOAPCD analysis of 2015 meteorological conditions.

**Comment D6:** The SLOAPCD requests the OHMVR Division revise text on Draft Program EIR page 1-7 to reflect that the OHMVR Division developed the proposed Dust Control Program independently.

Response to Comment D6: As shown in Section 3.2 of this Final Program EIR, the OHMVR Division has revised the text on Draft Program EIR page 1-7 to reflect the SLOAPCD's request and notes:

- This comment does not raise a significant environmental point regarding the Draft Program EIR's description or evaluation of the proposed Dust Control Program.
- As a point of clarification, the text referenced by the SLOAPCD does indicate that the OHMVR Division and SLOAPCD have only reached a "general consensus" on dust control at Oceano Dunes SVRA. The SLOAPCD's recommended alternative described in Draft Program EIR Section 12.4 includes similar dust control measures (i.e., vegetation and fencing) as that proposed by the OHMVR Division, albeit in slightly different locations. Thus, there would appear to be a general consensus on the approach to dust control at Oceano Dunes SVRA regardless of whether or not the proposed Dust Control Program was developed independently by the OHMVR Division.
- The SLOAPCD states the OHMVR Division developed the proposed Dust Control Program "independently as part of the NOP process, with no input from the SLOAPCD or ARB." This statement is inaccurate. The SLOAPCD itself has noted it submitted comments on the proposed Dust Control Program during the NOP process (see Draft Program EIR Section 1.5.1, as well as the response to SLOAPCD Comment D1). In addition, as a point of clarification, the OHMVR Division provided both administrative and public draft copies of the Draft Program EIR to CARB for review, and CARB did provide comments on the administrative draft copy that are reflected in the Draft Program EIR.

**Comment D7:** The SLOAPCD states the OHMVR Division has misinterpreted the stated goals of the Consent Decree Agreement and states the OHMVR Division needs to redefine its goals for the proposed Dust Control Program.

Response to Comment D7: Comment noted. This comment does not raise a significant environmental point regarding the Draft Program EIR's description or evaluation of the proposed Dust Control Program.

It is not clear why the SLOAPCD states the OHMVR Division has "misinterpreted" the goals of the consent decree, which are quoted directly (i.e., not paraphrased or interpreted) on Draft Program EIR page 2-1. As a point of fact, the Rule 1001 performance standard established by the SLOAPCD (55 micrograms per cubic meter) is less stringent than the state standard (50 micrograms per cubic meter), and the Draft Program EIR does not state or contain any language that suggests compliance with the Rule 1001 performance standard would achieve state standards. In addition, the SLOAPCD states the settlement agreement "defines compliance as "... meeting the standards set forth in Rule 1001." As a point of clarification, the settlement agreement uses the word compliance only once (Paragraph 3, subparagraph .iv), and only in reference to an annual meeting to review the status of "compliance with Federal and State PM10 standards and associated planning requirements." Thus, the settlement agreement does not define compliance as meeting the standards set forth in Rule 1001.

The SLOAPCD states the OHMVR Division needs to redefine the goals of the proposed Dust Control Program to reflect compliance with Rule 1001. The OHMVR Division has previously addressed this issue (see the responses to CCC Comment C4 in Section 4.3 of this Final Program EIR and SLOAPCD Comments D2 and D3 above). The SLOAPCD does not provide any specific facts to support its assertion that the proposed Dust Control Program does not meet the requirements of Rule 1001. It is true the Draft Program EIR does not explicitly state whether or not the proposed Dust Control Program would meet the performance standard established by Rule 1001. This is because it is not possible for the OHMVR Division or any other agency, including the SLOAPCD, to definitively and conclusively identify what magnitude of dust control is necessary to achieve compliance with the Rule 1001 performance standard. The clear and flexible objectives set for the proposed Program do not preclude achieving compliance with the Rule 1001 performance standard, and it is possible that the planting of approximately 100 acres of vegetation and the deployment of 40 acres of wind fencing would achieve compliance with the Rule 1001 performance standard. In addition, the OHMVR Division notes CARB suggested, and the OHMVR Division incorporated, that the Draft Program EIR identify making "ongoing and best possible progress" toward compliance with Rule 1001 as an objective of the proposed Program. Thus, this goal was developed in coordination with CARB.

**Comment D8:** The SLOAPCD states the Draft Program EIR identifies three potentially significant and unavoidable impacts based on subjective interpretation of CEQA and the California Coastal Act.

Response to Comment D8: The SLOAPCD asserts the OHMVR Division based the Draft Program EIR's significance conclusions on "subjective interpretation"; however, Comment D8 fails to define this phrase or provide any specific evidence or remarks to support this assertion. Thus, no response is warranted. Nonetheless, the OHMVR Division does direct the SLOAPCD to Draft Program EIR Section 1.2, which identifies

the OHMVR Division as CEQA Lead Agency for the Dust Control Program and notes the OHMVR Division prepared the Draft Program EIR in accordance with CEQA and the CEQA Guidelines. In addition, as a general concept, the CEQA Guidelines explain that CEQA applies to "discretionary actions," which are situations (emphasis added) "where a governmental agency can use its *judgement* in deciding whether and how to carry out or approve a project" (CEQA Guidelines Section 15002(i)). The CEQA Guidelines further define the term "discretionary project" to mean "a project which requires the exercise of judgement or deliberation when the public agency or body decides to approve or disapprove a particular activity . . ." (CEQA Guidelines Section 15357). Thus, CEQA anticipates a lead agency will exercise its objective, independent judgement during the CEQA review process.

Comment D9: The SLOAPCD states the OHMVR Division has created its own qualitative significance threshold that goes beyond what is defined in the CEQA guidelines and results in a significant recreation impact. The SLOAPCD also states the "proposed mitigation" for Draft Program EIR Impact REC-1 is to move vegetation plantings outside the open riding and camping areas to the "least emissive areas of the park," which is inconsistent with the goals of the proposed Program and the requirements of Rule 1001. Finally, the SLOAPCD states the OHMVR Division should not exclude any area from consideration for dust control without clear scientific justification.

Response to Comment D9: Draft Program EIR Section 4.3.1, as revised by this Final Program EIR (see Section 3.4), describes the thresholds of significance used by the OHMVR Division to evaluate whether the proposed Dust Control Program would have a significant environmental impact related to recreation and public access. The first threshold of significance is typically seen in CEQA documents because it is contained in CEQA Guidelines Appendix G (Environmental Checklist Form). The threshold is related to the increase in use of existing recreational facilities such that deterioration of the facilities would occur. As explained on page 4-19 to 4-20 of the Draft Program EIR, the Dust Control Program does not have the potential to accelerate the deterioration of existing recreational facilities because the OHMVR Division is not proposing changes to camping or visitor limits and would not induce or generate population growth.

The OHMVR Division also considered whether the proposed Dust Control Program would have a significant impact related to recreation if it would "Substantially limit, reduce, or interfere with established coastal recreational opportunities (Draft Program EIR page 4-20)." The SLOAPCD is correct this second threshold of significance was "self-defined" by the OHMVR Division for the proposed Dust Control Program. The SLOAPCD purports this threshold "goes beyond what is defined in the CEQA guidelines." This statement is incorrect for two reasons.

• First, CEQA Guidelines Appendix G does not establish a definitive or exhaustive list of resources, impacts, or thresholds of significance that require evaluation and/or consideration under CEQA. For example, CEQA Guidelines Section 15063 (f) states (emphasis added), "Sample forms for an applicant's project description and a review form for use by the lead agency are contained in Appendix G and H . . . . These forms are only suggested, and public agencies are free to devise their own format for an initial study. In addition, CEQA Guidelines Section 15064 states, in part (emphasis added), "The determination of whether a project may have a significant effect on the environment calls for careful judgement on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of

significant effect is not always possible because the significance of an activity may vary with the setting." Finally, the Environmental Checklist Form contained in Appendix G to the CEQA Guidelines states (emphasis added), "NOTE: The following is a sample form and may be tailored to satisfy individual agencies needs and project circumstances... The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance."

• Second, the OHMVR Division determined that the temporary and / or permanent change in the allowable form (i.e., vehicular and non-vehicular activities), availability, and location of coastal recreation opportunities at Oceano Dunes SVRA that could occur with implementation of the proposed Program constituted a physical change to the recreation environment that *required* evaluation under CEQA. Accordingly, the OHMVR Division defined a project-specific threshold for the Draft Program EIR. This threshold of significance was defined after conducting research into the thresholds of significance used by other local agencies and the California Coastal Commission, and the OHMVR Division has revised the text in Draft Program EIR Section 4.3.1 to reflect this fact (see Section 3.4 of this Final Program EIR).

The SLOAPCD also purports that Mitigation Measure REC-1, specifically the requirement to plant vegetation outside the Oceano Dunes SVRA open riding and camping area "in the least emissive areas of the park," is inconsistent with "the goals of project and the requirements of Rule 1001." This statement is also not true for several reasons.

- First, it is not clear what "goals" the SLOAPCD references in its remarks. If this is a reference to the goals set by the Rule 1001 settlement agreement, which are quoted on page 2-1 of the Draft Program EIR, the OHMVR Division has previously responded to this topic (see the response to Comment D7 above). The proposed Program does not preclude achieving compliance with the settlement agreement or the Rule 1001 performance standard, and the SLOAPCD is directed to the responses to CCC Comment C4 in Section 4.3 of this Final Program EIR and SLOAPCD Comments D2, D3, and D7 above. If the SLOAPCD is referring to the proposed Program objectives set forth in Draft Program EIR Section 2.1, planting vegetation outside the SVRA's open riding and camping area is entirely consistent with Program objectives.
- Second, Rule 1001 requires the OHMVR Division to "minimize PM10 emissions for
  the area under the control" such that compliance with the rule's performance standard
  is achieved. Importantly, the rule does not prescribe where the OHMVR Division
  must implement any specific dust control measure and, therefore, it is inaccurate to
  describe the planting of vegetation outside the open riding and camping area as
  inconsistent with Rule 1001 requirements.

<sup>&</sup>lt;sup>8</sup> The State Courts of Appeal, Second Appellate District, in *Save Cayuma Valley v. County of Santa Barbara. (2013, Case No. B233318)* reinforced the right of a lead agency to define project-specific thresholds of significance without a formal adoption process, stating, "Although an agency must determine whether "any of the *possible* significant environmental impacts of [a] project will, in fact, be significant" (*Protect The Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109), CEQA grants agencies discretion to develop their own thresholds of significance (CEQA Guidelines, § 15064, subd. (d)). More to the point, CEQA only requires that a threshold be formally adopted if it is for "general use"—that is, for use in evaluating significance in all future projects. (*Id.* at subd. (b).)."

• Third, it is not accurate to categorically describe the area outside the SVRA's open riding and camping area as "the least emissive areas of the park." The figure referenced in SLOAPCD Comment D4 clearly shows the southern portion of the SVRA's open riding and camping area having the same emissions potential as areas outside the open riding and camping area. In addition, the Pismo Dunes Natural Preserve is depicted as having a moderate emissions potential. Furthermore, the figure shows that most of the areas evaluated were inside the open riding and camping area; areas outside the open riding and camping area, including private lands adjacent to the northern part of the La Grande tract, have not been subject to the same level of study and analysis.

Finally, the SLOAPCD states no area should be excluded from consideration of dust controls without clear scientific justification that conclusively demonstrates controls in that area are not necessary. The SLOAPCD does not provide any specific evidence in its remarks that demonstrates those areas the OHMVR Division has excluded from the Dust Control Program area are necessary to achieve compliance with Rule 1001. In contrast, Draft Program EIR Section 1.1.3 summarizes approximately 10 studies issued since 2007 that have examined dust and PM generation at Oceano Dunes SVRA, culminating in a general understanding of the spatial variability of PM10 emissions at Oceano Dunes SVRA that shows higher PM10 measurements in the central to northern part of the SVRA's open riding and camping area. Accordingly, the OHMVR Division has developed the proposed Dust Control Program area to include "most of the open sand areas in the central to northern portion of the Oceano Dunes SVRA open riding and camping area . . . studies have identified this area as the area most likely influencing air quality measurements at the CDF station and air quality conditions on the Nipomo Mesa. . . the proposed Program area is situated in the middle of the SLOAPCD's CDF air quality forecast zone, which is the zone that experiences the worst air quality conditions during high wind and dust events" (Draft Program EIR page 2-18). Thus, the OHMVR Division has developed the proposed Program area using a robust scientific and factual data set collected over a nearly 10-year period. The OHMVR Division also notes that both its conditionally-approved PMRP and Draft Program EIR Section 2.3.3 described there are several environmental, technical, and logistical factors that guide where the OHMVR Division would plant vegetation and deploy seasonal dust control measures within the Dust Control Program area.

**Comment D10:** The SLOAPCD summarizes Draft Program EIR Impact LUP-1 and notes it may be necessary for the OHMVR Division to update the Oceano Dunes SVRA General Development Plan and Resource Management Plan to accommodate compliance with Rule 1001.

Response to Comment D10: Comment noted. The OHMVR Division has previously addressed the consistency of Mitigation Measure REC-1 and the proposed Dust Control Program with Rule 1001. The proposed Program does not preclude achieving compliance with the settlement agreement or the Rule 1001 performance standard, and the SLOAPCD is directed to the responses to CCC Comment C4 in Section 4.3 of this Final Program EIR and SLOAPCD Comments D2, D3, D7, and D9 above. In addition, CEQA Guidelines Section 15086(c) specifies that a public agency shall only make substantive comments regarding those activities involved in the project that are within an area of expertise of the agency (see also State Clearinghouse Comment A2). The SLOAPCD does not have expertise in matters regarding consistency with SVRA General Development and Resources Management Plans. But, as a point of clarification, the Draft

Program EIR's conclusions regarding both recreation and land use impacts are supported by a factual analysis that evaluates the loss of coastal vehicular recreation opportunities in the context of factors such as the recreational history of the SVRA, the number of visitors that could be affected by the loss in recreation opportunity, the extent to which changes in recreation opportunity would be perceptible to visitors, the availability of similar recreational opportunities, and the legislative mandate and mission of the OHMVR Division (see Draft Program EIR Section 4.3.1).

**Comment D11:** The SLOAPCD states the OHMVR Division has "modified" the Coastal Act definition of coastal-dependent development and notes the Coastal Commission should be asked to make a determination regarding the OHMVR's Division's interpretation of coastal dependent use.

Response to Comment D11: Comment noted. As discussed in the response to SLOAPCD Comment D10, the CEQA Guidelines specify that a public agency shall only make substantive comments regarding those activities involved in the project that are within an area of expertise of the agency. The SLOAPCD is not an agency with expertise in the interpretation of the Coastal Act. Nonetheless, for information purposes, the OHMVR Division is providing the following response to Comment D11.

As shown in Section 3.4 of this Final Program EIR, the OHMVR Division has revised the discussion on page 4-11 of the Draft EIR to indicate camping and OHV recreation at Pismo State Beach and Oceano Dunes SVRA may not be considered coastal-dependent development by the CCC. In addition, the OHMVR Division also directs the SLOAPCD to Draft Program EIR page 5-18, which acknowledges the CCC is the entity responsible for determining consistency with the Coastal Act. Please also see the response to CCC Comment C4 for additional information regarding this issue.

**Comment D12:** The SLOAPCD notes the Draft Program EIR concludes vehicle activity restrictions would not be as effective as vegetation or wind fencing. The SLOAPCD also states that areas subject to temporary or permanent vehicle activity restrictions have been documented to "significantly reduce sand transport" and are 5 to 8 times less emissive for PM10 than riding areas.

Response to Comment D12: Draft Program EIR Section 12.2.3, as revised by Section 3.8 of this Final Program EIR, evaluates the Reduced OHV Use Alternative, in which the OHMVR Division would voluntarily restrict the size of the area open to vehicular recreation at Oceano Dunes SVRA. The EIR, as revised, concludes this alternative would not obtain most of the basic objectives set for the proposed Program nor avoid or substantially lessen the proposed Program's significant and unavoidable impacts. Accordingly, the OHMVR Division has rejected this alternative from more detailed consideration.

The SLOAPCD does not provide a specific revision to the Draft Program EIR for the OHMVR Division to consider, nor dispute the conclusion of the EIR regarding the OHV Use Restriction Alternative. Rather, the SLOAPCD provides information regarding differences in potential PM10 emissions measured in riding and non-riding areas. Specifically the SLOAPCD references a report titled "2013 Intensive Wind Erodibility Measurements at and near Oceano Dunes State Vehicular Recreation Area: Report of Findings." As explained in the OHMVR Divisions response to SLOAPCD Comment D4, this report does not constitute new information pertaining to scientifically conclusive findings that change the information or findings presented in the Draft Program EIR. The

OHMVR Division directs the SLOAPCD to Draft Program EIR Section 1.1.3, which contains a summary of this report. Specifically, in regards to this report, the Draft Program EIR states (page 1-7), "In general, the study found that potential PM10 emissions were highest within the La Grande tract. Although the study could not explain why PM10 emissivity within the La Grande tract was the highest, it did note that factors such as sand grain size, meteorology, and topography all influence PM10 emissions (both potential and actual)." Nonetheless, as points of clarification:

- The SLOAPCD's remarks in Comment D12 imply that the only difference between the riding and non-riding areas studies in this report is vehicle activity when in fact this is not the case. The SLOAPCD's remarks do not accurately describe the report's findings. In its discussion, the report states (emphasis added), "PI-SWERL measurements have made it clear that the La Grande and South West riding areas, and to a lesser extent the East riding area, are exhibiting the potential for windblown PM10 emissions that is higher than the non-riding areas that were tested. What these measurements do not elucidate is the cause for this elevated potential for emissions in the riding areas." The report also goes onto identify that actual ambient wind conditions and topography are important factors to consider in evaluating potential emissions from any particular area of the dunes
- The SLOAPCD states "sand transport within the snowy plover exclosure during the period closed to riding was comparable to that measured in permanent nonriding areas." The SLOAPCD is generally correct that the referenced report does indicate potential PM10 emissions within the snowy plover exclosure are similar to other non-riding areas "; however, the referenced report and the SLOAPCD fail to acknowledge and consider the potential effect that the OHMVR Division's nesting management protocols have on potential PM10 emissions from the plover exclosure. As described in Section 2.1 of this Final Program EIR, the OHMVR Division emplaces woody debris and other shore wrack like materials that covers sand surfaces, absorbs wind energy, and may change surface emissivity. Thus, the reason for the lower potential PM10 emissions within the nesting exclosure is still being evaluated and has not been conclusively identified.

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than measured in the Oso Flaco region.

**Comment D13:** The SLOAPCD notes the Draft Program EIR concludes the SLOAPCD's recommended dust control program would modify USFWS-designated critical habitat for the western snowy plover and requests an explanation of how vegetated foredunes would have a more significant impact on snowy plover habitat than the current use of the area.

Response to Comment D13: As discussed in the response to SLOAPCD Comment D10, the CEQA Guidelines specify that a public agency shall only make substantive comments regarding those activities involved in the project that are within an area of expertise of the

The referenced report evaluated two areas where vehicle activity is permanently prohibited - the Pismo Dunes Natural Preserve (north of Oceano Dunes SVRA) and the SVRA's Oso Flaco region (south of the SVRA's open riding and camping area) - as well as one area where vehicle activity is temporarily restricted (the seasonal nesting exclosure in the central to southern part of the SVRA's open riding and camping area). The potential PM10 emissions within the nesting exclosure were found to be lower than measured in the Dunes Preserve and higher

agency. The SLOAPCD is not an agency with expertise in biological resources. Nonetheless, for information purposes, the OHMVR Division is providing the following response to Comment D13.

A basic purpose of CEQA is to inform governmental decision makers and the public about the potential significant environmental effects of a proposed activity (CEQA Guidelines Section 15002(a)(1). The CEQA Guidelines define the term "significant effect on the environment" to mean "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project . . . (CEQA Guidelines Section 15382)." CEQA specifies that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, and that this environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant (CEQA Guidelines Section 15125).

With this context in mind, the Draft Program EIR, as required by CEQA, describes the physical environmental conditions at and in the vicinity of the Dust Control Program area as they existed in February 2015, which was when the OHMVR Division issued the Notice of Preparation for the EIR. These descriptions are provided generally in Chapter 2 of the Draft Program EIR, and more specifically in the individual EIR chapters that address specific resource topics, such as recreation and biological resources. As described in Draft Program EIR Section 4.2 and Section 7.2, Pismo State Beach and Oceano Dunes SVRA are very popular destinations that also happen to support several special-status species, including western snowy plover and California least tern. In particular, the parks provide nesting and breeding habitat for these two species (See Draft Program EIR Figures 2-5, 2-8, and 2-9), some of which is designated by the USFWS as critical habitat for western snowy plover.

The OHMVR Division notes that human activity at Pismo State Beach and Oceano Dunes SVRA, including vehicular and non-vehicular recreation, is part of the physical environmental conditions that constitute the EIR's baseline. This does not mean these existing activities do not have the potential to influence the environment. But, importantly, the OHMVR Division actively manages the SVRA to enhance western snowy plover habitat and protect this species' nest sites. For example, the Draft Program EIR explains that the OHMVR Division enhances critical habitat and installs a seasonal nesting exclosure from March 1 to September 30 each year.

The OHMVR Division has added information to the EIR that describes the USFWS designated critical habitat in near shore areas at Pismo State Beach and Oceano Dunes SVRA because, in their existing condition, they contain the physical and biological features essential to western snowy plover (see Section 2.1 of this Final Program EIR). This includes, but is not limited to, areas of sandy beach above and below the high-tide line with occasional surf-cast wrack and generally barren to sparsely vegetated terrain. The OHMVR Division has also added information to the EIR that describes the western snowy plover requirement for open (or wide) sandy beaches with sparse vegetation to facilitate early detection of predators (see Section 2.1 of this Final Program EIR). Planting vegetation in critical habitat areas would alter these essential physical and biological features. In addition, vegetation in near shore areas would reduce the amount of open areas and increase the amount of vegetation, which could increase the risk of western snowy plover predation during nesting, foraging, and/or roosting if plovers are not able to detect approaching predators. As a result, planting vegetation in the near shore

areas could result in a significant impact to western snowy plover as evaluated under CEQA.

**Comment D14:** The SLOAPCD notes it cannot "unconditionally approve" the proposed Dust Control Program as described in the Draft Program EIR because it does not meet the PMRP or Rule 1001. The SLOAPCD states a revised or subsequent project description and EIR will need to be prepared soon.

Response to Comment D14: Comment noted. As a point of clarification, Draft Program EIR Section 1.2 notes CEQA and the CEQA Guidelines clearly establish the OHMVR Division as the Lead Agency for the proposed Dust Control Program EIR. The SLOAPCD does not have an approval role in the OHMVR Division's CEQA process. In addition, the SLOAPCD conditionally approved the OHMVR Division's PMRP in July 2013, and the Draft Program EIR indicates this approved PMRP forms the basis for the proposed Dust Control Program (see Draft Program EIR Table 1-2). The SLOAPCD does not provide any specific reason in its concluding remarks why the proposed Dust Control Program does not "meet" the PMRP. Finally, the OHMVR Division has addressed the issue of subsequent environmental review in its response to SLOAPCD Comment D2. While the OHMVR Division acknowledges that subsequent environmental review of dust control projects is required under CEQA, it is premature to speculate on the type and level of additional CEQA review that would be required to address the results of the modeling program described in Section 2.2 of this Final Program EIR. The OHMVR Division would review and evaluate the results of this modeling program to see if they fit within the scope of the Dust Control Program EIR when it is appropriate to do so (e.g., when the modeling is complete to the satisfaction of the OHMVR Division, SLOAPCD, and CARB).

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## COMMENT LETTER "E"

LAW OFFICES OF THOMAS D. ROTH ONE MARKET, SPEAR TOWER, SUITE 3600 SAN FRANCISCO, CALIFORNIA 94105 (415) 293-7684 (415) 276-2376 (Fax) Rothlaw1@comcast.net

August 2, 2016

By e-mail: OHVinfo@parks.ca.gov

California Department of Parks and Recreation Ronnie Glick, Senior Environmental Scientist Oceano Dunes District CDPR, OHMVR Division 340 James Way, Suite 270 Pismo Beach, CA 93449 (805) 773-7180

RE: Request for Extension of Comment Period for Oceano Dunes SVRA Dust Control Draft Program EIR

Dear Mr. Glick:

This letter is a request for a 90-day extension of the public comment period for the *Oceano Dunes SVRA Dust Control Draft Program EIR* (Draft Program EIR) so that the public may exercise its right to provide meaningful comments on this important, complex, two-volume Draft Program EIR that is over 400 pages. The Notice of Availability for this Draft Program EIR was released to the public on August 2, 2016. However, it provides only 45 days for the public to read, review, analyze, and digest a Draft Program EIR that State Parks has been preparing since it issued its Notice of Preparation and Initial Study back in 2012.

This firm represents Friends of Oceano Dunes ("Friends"), a non-profit corporation, representing approximately 28,000 members and users of the Oceano Dunes State Vehicular Recreation Area ("SVRA") located near Pismo Beach, California.

Since 2001, Friends, as a public watchdog association, has actively reviewed and participated in agency processes concerning the oversight and development of rules, policies, plans, programs and/or proposals regarding management, critical habitat, recovery, predator management, environmental resources and issues, and conservation of species that might affect Oceano Dunes

F1

**E2** 

SVRA. Friends' members are interested participants because they live near, use, recreate, visit and personally enjoy the aesthetic, wildlife and recreational resources of the dunes area, including hiking, exploring and observing wildlife and vehicular recreational opportunities. Friends has participated in management and protection of species, environmental and recreational resources, and habitat for the SVRA, and thus has both the experience and personal interest in the Draft Program EIR.

Friends requests an extension of the comment period to enable it sufficient time to read, digest and analyze the over 400-page Draft Program EIR so that it may exercise its right to a meaningful participation in this process. This is particularly important because the Notice of Availability states that the "anticipated significant environmental effects" include potentially significant impacts "related to recreation (limit and interfere with coastal vehicular recreation opportunities) and two potentially significant impacts related to land use (conflict with ... Oceano Dunes SVRA General Development Plan and Resource Management Plan and conflict with the California Coastal Act). Mitigation is proposed but impacts to recreation and land use would remain significant and unavoidable on both a program- and cumulative-level."

Thank you in advance for your attention and consideration of this matter.

Sincerely, /s/ Tom Roth Legal Counsel for Friends of Oceano Dunes

Cc: Jim Suty, President, Friends of Oceano Dunes

F2

#### 4.5 RESPONSE TO COMMENTS FROM THE LAW OFFICES OF TOM ROTH

The OHMVR Division received two comments from the Law Offices of Tom Roth, representing Friends of Oceano Dunes. These comments requested an extension of the 45-day commenting period for the Draft Program EIR.

**Comment E1:** Mr. Roth requests a 90-day extension of the 45-day public comment period provided for the Draft Program EIR.

Response to Comment E1: Comment noted. As explained in Section 1.1 of this Final Program EIR, on August 30, 2016, the OHMVR Division issued a Notice of Extended Public Review announcing the 45-day comment period on the Draft Program EIR, which was set to expire Friday, September 16, 2016, was extended by 17 days until October 3, 2016. This extension was intended to allow the agencies and the public additional time to submit comments on the Draft Program EIR. The OHMVR Division could not provide a 90-day extension of the public review period due to concerns regarding the EIR schedule and the need to implement dust control measures as early in the Spring 2017 windy season as feasible.

In addition, the commenter states the OHMVR Division has been preparing the Draft Program EIR since it issued a NOP and Initial Study in 2012. As explained in Section 1.1 of this Final Program EIR, the 2012 NOP and Initial Study were prepared for an earlier iteration of the Dust Control Program. Subsequent to the release of the 2012 NOP, the OHMVR Division substantially revised the Dust Control Program area and activities and reduced the duration of the Program covered by the EIR. Accordingly, the OHMVR Division issued a Revised NOP in February 2015 so that agencies and the public could have the opportunity to provide meaningful comments on the currently proposed Dust Control Program. The Revised NOP described the proposed dust control program, its location, and probable environmental effects and formed the basis for scoping comments related to the Draft Program EIR.

Comment E2: Mr. Roth states his firm represents Friends of Oceano Dunes, a large non-profit corporation representing approximately 28,0000 members and users of Oceano Dunes SVRA, notes the organization's interest and involvement in matters involving the SVRA, and reiterates the request for a 90-day extension of the Draft Program EIR's public review period. The comment period is not sufficient time "to read, digest and analyze a Draft Program EIR that State Parks has been preparing since it issued its Notice of Preparation and Initial Study back in 2012."

Response to Comment E2: Comment noted. As explained in the response to Comment E1, the public review period for the Draft Program EIR was extended by 17 days in partial accommodation of the request for extended public review.

sponses to Draft EIR Comments	Page 4-
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# California State Parks Off-Highway Motor Vehicle Recreation Division

# COMMENT LETTER "F"

# Oceano Dunes SVRA Dust Control Project August 23, 2016 EIR Scoping Meeting

# **Comment Card**

Debore Peterson NAME	280 W Grand Ave#B
Peterson Team Realty ORGANIZATION /AFFILIATION	Grover Beach
Peterson Teame charter net E-MAIL ADDRESS	
Comment: 1 speak as a business	
resident who lives t works w	ithin a block of the beach.
) I support the planting of tree	es inland as they are a proven
buffer against high winds & pai	
of the county + APCD'S lack	
their FIR mitigations in the 19	98 Woodlands EIR - by allowing
hundreds of trees to be	removed.
2) While it may be helpful to	
	onk there, I am rurious about F2
incorporating it as a dist	late control measure. My understanding
from the APCD'S zone map	
particulate in Grove Beach	*
3) I am opposed to the ora	nge ferres - they are a tot permanent
24/7 blight on the landscape	be whereas vehicles are only =3
there during part of the day	and not such an eyespre as
they are transient - Impact to	aeothetics
Phase direct the APCD + Co. of	Sio to be diligent in
Thank You enforcement of KNO OHMVR Division and identified	mutigations they put F4
in place in the 2: 1998 &	EIR - construction especially

ponses to Draft EIR Comments	Page 4
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## 4.6 RESPONSE TO COMMENTS FROM PETERSON TEAM REALTY

The OHMVR Division received four comments from Debbie Peterson of Peterson Team Realty. In general, these comments pertain to proposed Dust Control Program area and activities.

**Comment F1:** Ms. Peterson supports the planting of trees inland of Oceano Dunes SVRA.

Response to Comment F1: Comment noted. Potential tree plantings are described in Draft Program EIR Section 2.3.2.3; however, as noted in this section "tree planting would be unlikely to control or minimize dust emissions during the five-year period covered by this EIR." Draft Program EIR page 2-20 also notes the exact amount of tress that could be planted downwind of Oceano Dunes SVRA, if any, is unknown at this time.

**Comment F2:** Ms. Peterson requests clarification why the City of Grover Beach is included in the Dust Control Program area since the SLOAPCD has not identified Grover Beach as an area impacted by dust or PM10.

Response to Comment F2: Ms. Peterson is correct that the SLOAPCD has not identified the City of Grover Beach as an area with high dust and PM10 levels. As explained in Draft Program EIR Section 2.3.1.2, the proposed Dust Control Program area includes a small portion of Grand Avenue in the City of Grover Beach for the installation, operation, and maintenance of a track-out prevention device required by SLOAPCD Rule 1001.

**Comment F3:** Ms. Peterson expresses opposition to orange fencing, stating it is a permanent blight on the landscape whereas vehicles are only present part of the time.

Response to Comment F3: Comment noted. Ms. Peterson expresses an opinion that was anticipated in the Draft Program EIR's evaluation of potential aesthetic impacts. See the discussion under Draft Program EIR Impact AES-1, which states, in part "Thus, a brightly-colored, large seasonal dust control array (such as orange wind fencing) against the dune landscape is presumed to be at least partially visible to most visitors from most areas of the SVRA for approximately seven months out of the year (March 1 to September 30) . . . The size, rectilinear design, and potential to contrast with natural dune landscape colors would make seasonal dust control measures a noticeable and distinct change to the visual character and quality of Oceano Dunes SVRA and its surroundings. much more so than Dust Control Program vegetation . . . Park visitors may or may not be highly sensitive to the visual change resulting from the deployment of seasonal dust control measures such as wind fencing and straw bales (Draft Program EIR pages 6-21 to 6-22." Comment F3, therefore, does not represent new information that changes the findings of the Draft Program EIR. The Draft Program EIR concluded the proposed Dust Control Program's seasonal dust control measures, including wind fencing, would not result in a substantial adverse change to the visual character and quality of Oceano Dunes SVRA due to the inclusion of Standard and Specific Project Requirements and other factors such as topography, the temporary nature of seasonal dust control measures, and the ability to take in other views.

**Comment F4:** Ms. Peterson requests the OHMVR Division direct SLO County and the SLOAPCD to enforce mitigation from the 1998 Woodlands Specific Plan EIR.

Response to Comment F4: The enforcement of any mitigation measures contained in the 1998 Woodlands Specific Plan EIR is outside the scope of the CEQA review of the proposed Dust Control Program and the OHMVR Division's jurisdictional authority.

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Oceano Dunes SV	/RA Dust Control Program Final Program El	R – March 2017

# California State Parks Off-Highway Motor Vehicle Recreation Division

# COMMENT LETTER "G"

# Oceano Dunes SVRA Dust Control Project August 23, 2016 EIR Scoping Meeting

## **Comment Card**

Nick Lalaune	1329 Atlantic city Ave
NAME	ADDRESS Grover Beach
Pismo Dune Riders President	Lower Beach
ORGANIZATION /AFFILIATION	<u></u>
E-MAIL ADDRESS	
Comment: Sand is naturally presen	nt And so is wind
unless you are God you	cannot control either.
Any Area that Is closed of	f for Oust control
measures another area of equal	Size should be opened G2
That was previously Closed, A	u inch closed should equal
an inch opened.	
	<del></del>
Thank You	(Continue on back if necessary)

**OHMVR Division** 

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Oceano Dunes SVRA Dust Control Program Final Progra	

#### 4.7 RESPONSE TO COMMENTS FROM PISMO DUNE RIDERS

The OHMVR Division received two comments from the Nick Lalanne, President of the Pismo Dune Riders. In general, these comments pertain to the OHMVR Division's overall approach to implementing dust control measures at Oceano Dunes SVRA.

**Comment G1:** Mr. Lalanne states sand and wind are natural features of the environment and thus cannot be controlled.

Response to Comment G1: Draft Program EIR Section 1.1.1 and 3.4.3 provides a brief discussion of the natural geologic and atmospheric processes that have shaped the Guadalupe-Nipomo Dune Complex.

**Comment G2:** Mr. Lalanne states if any area is closed off for dust control activities there should be another area equal in size that is opened.

Response to Comment G2: Mr. Lalanne does not state explicitly state that the area opened should be opened for OHV recreation. Presuming that is the case (given the commenters role as President of the Pismo Dune Riders), the OHMVR Division notes it has revised Mitigation Measure REC-1 to specify a 1:1 replacement ratio for the loss of OHV recreation lands (see Section 3.4 of this Final Program EIR). Please refer also to the OHMVR Division's response to Friends of Oceano Dunes Comment K9 for additional information on this topic.

ponses to Draft EIR Comments	Page
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# COMMENT LETTER "H"

From: <u>Glick, Ronnie@Parks</u>

To: <u>Dugan Christopher (cdugan@migcom.com)</u>

**Subject:** FW: public comment dust study

Date: Thursday, September 29, 2016 2:40:53 PM

From: Lucia Casalinuovo [mailto:luciagalore@gmail.com]

**Sent:** Tuesday, September 27, 2016 9:21 PM **To:** Glick, Ronnie@Parks; safebeachnow@gmail.com

Subject: public comment dust study

# Hello Ronnie,

Here is our comment to the dust study. Please make sure it gets published. Thank you.

The Air Pollution Control District (APCD) studies and observance of the dust plum show that the cause of the toxic dust that is a health hazard to citizens downwind of the Oceano Dunes State Vehicle Recreation Area (ODSVRA) is motor vehicles driving on and grinding the sand on the beach and dunes.

To allow the Off Highway Motor Vehicular Recreation Division (OHMVR) of California State Parks to "study" the dust issue and propose control measures is asking the fox to make sure the chicken pen is fox proof. State Parks and its OHMVR division have a monetary interest in the operation of the ODSVRA beyond our comprehension. They will do anything to keep receiving a cut of our gas tax dollars. Little wonder that this study is biased and misleading. It is a scam.

The costs of operating the ODSVRA include the health impacts on the Nipomo Mesa and Oceano beach community. Add to that the noise, the traffic, the trash left behind, and the destruction of the ecosystem of the beach, Arroyo Grande Creek, and dunes. We are paying with our health and the quality of our lives and ecosystem so that some can seek injurious and deadly thrills.

Most of the measures the study suggests have been in place for years and yet there is no evidence that they have been effective. The only new measure included is the installation of grooved concrete panels at the park's two entrances to reduce the amount of sand tracked out of the park. One is proposed for Pier Avenue, already too noisy without the noise of thousands of vehicles crossing a loud cattle guard. To suggest anything other than the closure of Pier Avenue to ODSVRA access except for emergency vehicles is ludicrous. Emergency vehicles which serve the ODSVRA and the Oceano

**H1** 

H2

H3

beach community are greatly impeded by traffic that is routinely backed up for the entire length of Pier Avenue. The Pier Avenue ramp is a funnel for rogue waves and tempestuous high tides. The ramp has been wiped out more than once in the past. Making it wider and deeper is a threat to the Oceano beach community as global warming and sea level rise continue.

**H3** 

There is only one effective measure to control the dust blown over the Nipomo Mesa and the Oceano beach community generated by motor vehicles driving on and grinding the sand of the beach and dunes: shut down the Oceano Dunes State Vehicle Recreation Area (ODSVRA).

H4

Lucia Casalinuovo per Safe Beach Now 9/27/2016

#### 4.8 RESPONSE TO COMMENTS FROM SAFE BEACH NOW

The OHMVR Division received four comments from Lucia Casalinuovo, representing Safe Beach Now. In general, these comments pertain to the health effects of dust on surrounding areas and degradation of the environment from the proposed Dust Control Program and ongoing activities at Oceano Dunes SVRA.

**Comment H1:** Safe Beach Now remarks SLOAPCD studies have documented Oceano Dunes SVRA is the source of dust that it is a health hazard to citizens downwind of Oceano Dunes SVRA and that the OHMVR Division has prepared a biased study.

Response to Comment H1: This comment suggests information that is consistent with the information presented in the Draft Program EIR. The OHMVR Division directs Safe Beach Now to Draft Program EIR Section 1.1.3, which summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA and which helped to form the basis for the proposed Dust Control Program, including the SLOAPCD's Phase 1, Phase 2, and Community Monitoring reports. In addition, the OHMVR Division directs Safe Beach Now to Draft Program EIR Section 1.2, which explains that CEQA and the CEQA Guidelines establish the OHMVR Division as the CEQA Lead Agency for the proposed Dust Control Program. Finally, the OHMVR Division directs Safe Beach Now to Draft Program EIR Section 1.4, which explains that the OHMVR Division has prepared an objective, informational document that contains a sufficient degree of analysis to inform decision makers about the proposed Dust Control Program's potential direct and indirect physical, environmental effects.

**Comment H2:** Safe Beach Now provides general remarks regarding the effects Oceano Dunes SVRA has on surrounding communities.

Response to Comment H2: Comment H2 refers to existing conditions and does not raise any specific points on the Draft Program EIR's evaluation of the proposed Dust Control Program's potential environmental impacts.

**Comment H3:** Safe Beach Now states the Draft Program EIR mostly proposes measures that have been previously undertaken and which have not been effective. Safe Beach Now also suggests the OHMVR Division should close Pier Avenue instead of installing grooved concrete panels, because traffic using the Pier Avenue entrance impedes emergency vehicle access and the ramp itself is a funnel for rogue waves which could worsen as sea level rises.

Response to Comment H3: First, Safe Beach Now is incorrect regarding its statement that vegetation and seasonal dust control measures are not effective. The OHMVR Division directs Safe Beach Now to Draft Program EIR Section 1.1.3, as well as Draft Program EIR Sections 2.3.2.1 and 2.3.2.2, which provide information on the demonstrated effectiveness of vegetation (90% to 99% effective) and seasonal dust control measures (40% to 70% effective on average). Second, the OHMVR Division is not proposing to close Pier Avenue, and changes in access to Pismo State Beach and Oceano Dunes SVRA are outside the scope of the Draft Program EIR. Third, Comment H3 refers to existing conditions on Pier Avenue, which the proposed Program does not change. The OHMVR Division directs Safe Beach Now to Draft Program EIR Section 4.3, which explains that the proposed Dust Control Program would have a less than significant impact on public access. Fourth, as stated on Draft Program EIR Section 2.3.2.6 and shown in Draft Program EIR Figures 2-6 and 2-7, the proposed track-out prevention

device on Pier Avenue would consist of grooved concrete panels that "would be between 50 to 125 feet in length, and would be located in the Grand Avenue and Pier Avenue roadways, potentially extending down the entrances' sand ramps." Thus, the installation of these panels would not substantially change the road topography or prism or exacerbate any existing or future conditions related to flooding. Finally, Safe Beach Now uses the phrase "cattle guard" to describe the track-out prevention device. This is incorrect. The OHMVR Division is not proposing the use of a cattle guard, which is typically a metal grate structure situate above a void built into the road to deter the movement of livestock across it. As explained above, the OHMVR Division is proposing the use of grooved concrete panels.

**Comment H4:** Safe Beach Now states the only effective measure to control dust is to shut down the Oceano Dunes SVRA.

Response to Comment H4: Comment noted. The OHMVR Division directs Safe Beach Now to Draft Program EIR Chapter 12, which includes a robust evaluation of alternatives to the proposed Program, consistent with the requirements of CEQA and the CEQA Guidelines. Specifically, Section 12.2.3 addresses alternatives that considered reduced OHV use areas, similar to that suggested by Safe Beach Now. The Draft Program EIR concludes these alternatives would not obtain the objectives the OHMVR Division has set for the proposed Dust Control Program and /or would not reduce the proposed Program's significant environmental effects.



# COMMENT LETTER "I"

Sept. 30, 2016

Ronnie Glick, Sr. Environmental Scientist Oceano Dunes District CDPR, OHMVR Division 340 James Way, Suite 270 Pismo Beach, CA 93449

Dear Mr. Glick,

We submit the following comments on the Draft Program EIR for the Oceano Dunes SVRA Dust Control Program on behalf of the 2,000 members of the Santa Lucia Chapter of the Sierra Club in San Luis Obispo County. The Sierra Club is the nation's oldest and largest grassroots environmental organization.

We will restrict our comments on the Draft EIR to its fatal flaw: a misreading of a single clause in the CEQA Guidelines which has resulted in an attempt to stand CEQA on its head and produced a Draft EIR that impermissibly shifts and narrows its focus, primarily identifying the project's impacts on OHV recreational opportunities rather than potential impacts on the environment, then attempting to elevate alleged recreational impacts to the level of "significant and unavoidable" (REC-1, LUP-1, LUP-2, CML-1, CML-2, et al). The DEIR also frequently veers from a discussion of impacts under CEQA to alleged conflicts with the Oceano Dunes SVRA General Development Plan and Resource Management Plan and attempts to create a new CEQA category of "significant conflict" (Impact LUP-1), the fact that the project does not "perpetuate and enhance recreational use of OHVs in the SVRA" is a violation of CEQA.

### What CEQA says

The Draft EIR's theory of significant impacts to recreational opportunities resulting from the dust control program rests on two sentences found in the Environmental Checklist in Appendix G of the CEQA Guidelines – in which all items are listed under the notation "The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance."

The two sentences read, in their entirety:

11

12

13

#### XV. RECREATION.

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?
  - CEQA Guidelines, Appendix G, Environmental Checklist Form

It is clear from the context of these sample questions and those surrounding them that the intent was to ensure analysis of potential impacts arising from increased use of parks as a result of project that would attract additional residents or visitors, thereby increasing traffic and the use of surrounding park facilities due to enhanced spill-over impacts. The Project, as the DEIR repeatedly notes, will not have such an impact. The type of "recreational impact" asserted by the DEIR — an impact from the reduction of the acreage available for recreational vehicle use within an existing recreational area, considered to be an impact on that recreational area — is not contemplated in CEQA.

### The Program does not conflict with the California Coastal Act

The DEIR attempts to base claims of impacts on vague statement that vegetating the dunes would not "maximize coastal recreation opportunities, as generally required by the Coastal Act" (CML-2), without reference to the fact that the Coastal Act also generally requires the protection of coastal resources. California Coastal Commission staff has recommended to DPR that "Expansion of the enclosure area, in conjunction with strong predator management, is the best way to maximize protection of plovers and their habitat at Oceano." When the Coastal Commission announced its Feb. 11, 2015, review of the SVRA's Coastal Development Permit, the most recent occasion on which the Commission has weighed in on issues at the SVRA, it was announced as a meeting to "assess the overall effectiveness of methods being used to manage vehicle impacts in relation to coastal resources at ODSVRA." Commissioners at that meeting told DPR representatives: "Using our beaches as a highway is not okay. Crossing creeks like that, which have two kinds of listed species in them, is not okay," and told the APCD "The idea of continuing to put more and more hay bales into our dunes, and then they get covered up, and then we have to put in more.... I just hope you will continue to work with something which is more environmentally sensitive to the dunes."

Per the arbiters of the California Coastal Act, the DEIR appears to distort the purpose and intent of the Coastal Act in order to make its desired argument that <u>limiting and reducing an environmental impact</u> would somehow result in conflict with the Coastal Act (LUP-2).

The SLO County Air Pollution Control Officer has made clear the most efficient measure for the reduction of dust emissions from the SVRA: "Reestablishing vegetated foredunes in the areas where they have been destroyed by vehicle activity would appear to be the most effective strategy, followed by establishing additional vegetation islands in the inland riding areas. Studies performed by [Desert Research Institute] as described in their Oceano Dunes Pilot Projects report show vegetated areas to be nearly 100% effective in reducing sand movement and would provide year-round, permanent reductions; wind fencing is less than half as effective at best, and provides only a temporary solution." (APCD Letter to California Coastal Commission, Jan. 27, 2015.) Sand fencing and soil binders, he wrote, "are not adequate without significant revegetation."

In attempting to dismiss the Alternate Dust Control Program (S.1.3.3.), the DEIR floats the notion that "the emphasis on planting vegetation in the near-shore areas would likely modify, to some degree, USFWS-designated critical habitat for the western snowy plover" and "the vegetation planting may change the dune ecosystem in a manner that adversely affects the environment for two breeding listed species, which is inconsistent with the OHMVR Division's need to manage and protect these natural resources." Rather than engage in vague speculation in order to allege impacts, if the DEIR wishes to raise this as an issue it must first analyze the modification of habitat that occurred when recreational vehicle use stripped the foredunes of their original vegetation.

The Draft EIR is in need of revision and recirculation. But even if it should go forward with its unique and unsupported concept of "recreational impacts" intact, the Overriding Considerations to accompany certification of the EIR are simple: Long-term exposure to PM10 pollution can cause decreased lung function, chronic bronchitis, pulmonary disorders, premature death in people with heart or lung disease, and increase the risk of cancer by 50 percent.

Thank you for your attention to these issues,

Andrew Christie, Director Santa Lucia Chapter of the Sierra Club P.O. Box 15755 San Luis Obispo, CA 93406 (805) 543-8717

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## 4.9 RESPONSE TO COMMENTS FROM THE SIERRA CLUB

The OHMVR Division received five comments from Andrew Christie, Director of the Santa Lucia Chapter of the Sierra Club. In general, these comments are related to the Draft Program EIR's evaluation of recreation impacts, land use impacts, and alternatives.

**Comment I1:** The Sierra Club provides introductory remarks that state the OHMVR Division has "misread" the CEQA Guidelines with regard to the Draft Program EIR's evaluation of potential recreation and land use impacts.

Response to Comment II: The Sierra Club's opinion does not present any specific information or evidence regarding how the OHMVR Division has "misread" the CEQA Guidelines. As described on page 1-1 of the Draft Program EIR, the OHMVR Division prepared the Draft Program EIR "to evaluate the potentially significant environmental impacts that may result from implementation of Oceano Dunes SVRA Dust Control Program." The OHMVR Division also directs the Sierra Club to Draft Program EIR Section 1.2, which identifies the OHMVR Division as CEQA Lead Agency for the Dust Control Program and notes the OHMVR Division prepared the Draft Program EIR in accordance with CEQA and the CEQA Guidelines. In addition, as explained in the OHMVR Division's response to SLOAPCD Comments D8 and D9, CEQA anticipates a lead agency will exercise its objective, independent judgement during the CEQA review process, and CEQA does not establish a definitive or exhaustive list of resources, impacts, or thresholds of significance for evaluation and/or consideration by a lead agency.

**Comment I2:** The Sierra Club references Appendix G to the CEQA Guidelines and purports the Draft Program EIR's evaluation of the loss of acreage available for vehicular recreation is not an impact contemplated by CEQA.

Response to Comment 12: The Sierra Club asserts the Draft EIR identifies a type of impact that is not contemplated by CEQA but does not provide any specific evidence or information to support its assertion. In contrast, as explained in the OHMVR Division's response to SLOAPCD Comments D8, D9, and D14 (see Section 4.4 of this Final Program EIR), CEQA requires a lead agency to exercise its objective, independent judgement so that governmental decision makers and the public may be informed about the potential significant environmental effects of a proposed activity. Draft Program EIR Section 4.3.1, as revised by Section 3.4 of this Final Program EIR, describes the thresholds of significance use by the OHMVR Division to evaluate whether the proposed Dust Control Program would have a significant environmental impact related to recreation and public access. CEQA Guidelines Appendix G does not establish a definitive or exhaustive list of resources, impacts, or thresholds of significance that require evaluation and/or consideration under CEQA. The OHMVR Division determined that the temporary and / or permanent change in the allowable form (i.e., vehicular and non-vehicular activities), availability, and location of coastal recreation opportunities at Oceano Dunes SVRA that could occur with implementation of the proposed Program constituted a physical change to the recreation environment that required evaluation under CEQA.

**Comment I3:** The Sierra Club states the Draft Program EIR does not reference the fact that the Coastal Act "generally requires" the protection of coastal resources, references CCC staff and Commissioner discussions that took place with regards to Oceano Dunes SVRA CDP 4-82-300,

and concludes the OHMVR Division has distorted the purposes and intent of the Coastal Act to support its "desired" argument that the proposed Program conflicts with the Coastal Act.

*Response to Comment 13*: The OHMVR Division disagrees with the Sierra Club's remarks for several reasons.

First, as a point of clarification, the Draft Program EIR does state the Coastal Act requires the protection of coastal resources. The OHMVR Division directs the Sierra Club to Draft Program EIR Section 5.1.2, which states, in part (emphasis added), "The California Coastal Act (PRC §30000 et seq.) identifies the Coastal Zone as a valuable natural resource which should be protected from deterioration and destruction to promote public safety, health, welfare, and to protect public and private property, wildlife, marine fisheries and other ocean resources and natural environment . . . The Coastal Act ensures that existing developed uses and future developments are carefully planned and developed consistent with the policies of the Coastal Act . . . Relevant goals of the Coastal Act include protecting the overall quality of the Coastal Zone environment, assuring orderly balanced utilization and conservation of Coastal Zone resources, maximizing public access and recreational opportunities consistent with resource conservation, and giving priority to coastal-dependent and coastal-related developments over other development on the coast. To achieve these goals, the Coastal Act sets forth specific policies that address issues including, but not limited to, shoreline public access and recreation, lower cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works." In addition to protecting natural resources, the Coastal Act also calls for maximizing public access and recreational opportunities consistent with resource conservation needs. As explained in Section 2.1 of this Final Program EIR, the OHMVR Division undertakes a robust western snowy plover management program to enhance western snowy plover habitat and reduce predation on western snowy ployer nests. Since the implementation of this management program, the OHMVR Division has observed an increase in western snowy plover individuals (i.e., number of birds) and reproductive success (i.e., fledglings per breeding male).

Second, the Sierra Club's reference to CCC staff recommendations and Coastal Commissioner discussions in regards to CDP 4-82-300 (as amended) are not germane to the scope of the OHMVR Division's CEQA review of the proposed Dust Control Program, and the Sierra Club does not make any specific recommendation or request pertaining to this information. Nonetheless, this is not new information that changes the Draft Program EIR. The OHMVR Division directs the Sierra Club to Draft Program EIR Section 2.2.4.2, which includes a description of CDP 4-82-300 and notes the OHMVR Division submitted its 15<sup>th</sup> annual Technical Review Team (TRT) report to the CCC in March 2016.

Finally, the Draft Program EIR does not "distort" the purpose and intent of the Coastal Act for the purposes of making a "desired argument." As explained in the response to CCC Comments C2 and C11, the OHMVR Division is obligated under CEQA to evaluate all potentially significant direct, indirect, and cumulative impacts of the proposed program, and the OHMVR Division has exercised its objective, independent judgement in doing so. Draft Program EIR Section 5.3.1 clearly identifies that, according to Appendix G of the CEQA Guidelines, the proposed program would have a significant

effect on land use if it would "conflict with any plan, policy, or regulation of an agency with jurisdiction over the project . . . adopted for the purposes of avoiding or mitigating an environmental impact." Thus, under CEQA, the OHMVR Division is required to consider the proposed Program's consistency with the Coastal Act. As noted in the discussion for Draft EIR Impact LUP-2, the OHMVR Division, acting as the CEQA Lead Agency, has determined the proposed Dust Control Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA. Regardless of this CEQA determination, the OHMVR Division's CDP application and the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC. Accordingly, the Draft EIR also notes (page 5-18), "the CCC may determine the Dust Control Program, as described in this EIR, is consistent with the Coastal Act and/or impose additional conformance on the Program as necessary to support its issuance of a CDP and the Program's conformance with the Coastal Act."

Comment I4: The Sierra Club references a letter from the SLOAPCD Air Pollution Control Officer to the California Coastal Commission and implies that vegetation is the most efficient measure for reducing dust emissions. The Sierra Club then asserts the Draft Program EIR engages in "vague speculation" regarding impact to USFWS-designated critical habitat, and states the OHMVR Division must analyze habitat modification that occurred due to recreational vehicle use.

Response to Comment 14: Comment noted. As described in the response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the Draft Program EIR describes the physical environmental conditions as they existed in February 2015, which was when the OHMVR Division issued the Notice of Preparation for the EIR. These descriptions are provided generally in Chapter 2 of the Draft Program EIR, and more specifically in the individual EIR chapters that address specific resource topics, such as recreation and biological resources. Recreational vehicle use at Pismo State Beach and Oceano Dunes SVRA is part of the existing environmental conditions and does not need to be analyzed in the Draft Program EIR. In addition, the OHMVR Division has added information to the EIR that describes the USFWS designated critical habitat in near shore areas at Pismo State Beach and Oceano Dunes SVRA because, in their existing condition, they contain the physical and biological features essential to western snowy plover (see Section 2.1 of this Final Program EIR). OHMVR Division has also added information to the EIR that describes impacts from planting vegetation within western snowy plover and California least tern habitat, including western snowy plover critical habitat (see Section 3.7 of this Final EIR). Planting vegetation in critical habitat/near shore areas would alter essential physical and biological features. In addition, vegetation in near shore areas would reduce the amount of open areas and increase the amount of vegetation, which could increase the risk of western snowy ployer and/or California least tern predation during nesting, foraging, and/or roosting if birds are not able to detect approaching predators. As a result, planting vegetation in the near shore areas could result in a significant impact to western snowy plover and/or California least tern as evaluated under CEOA.

**Comment I5:** The Sierra Club states the Draft Program EIR is in need of revision and recirculation but suggests there are overriding considerations that would warrant certification of the EIR even if it is not revised.

Response to Comment 15: Comment noted. The Sierra Club does not provide a specific reason why the Draft Program EIR should be revised and / or recirculated. As explained in the responses to Sierra Club Comments I1 to I4 above, the OHMVR Division has evaluated the proposed Dust Control Program's potential recreational and land use impacts, as well as a range of reasonable alternatives to the proposed Program, in accordance with and as required by CEQA. The Draft Program EIR does not need to be recirculated. The Sierra Club correctly notes that, should the OHMVR Division decide to certify the EIR for the Dust Control Program, a statement of overriding considerations would be required because the Draft Program EIR identifies the proposed Program would result in several significant and unavoidable impacts that cannot be avoided or substantially reduced via mitigation measures or Program alternatives. Thus, the OHMVR Division would prepare and adopt a statement of overriding consideration at the time it considers certifying this Program EIR.

# Cal4 Wheel

# **COMMENT LETTER "J"**

#### California Four Wheel Drive Association, Inc.

Over 55 years advocating for recreation

The California 4 Wheel Drive Association Inc. was founded in 1959 and we are a non-profit organization that has actively promoted the advancement of vehicle oriented outdoor recreation for over 55 years.

C4WDA is a volunteer-based organization of enthusiasts who promote responsible family recreation and exercise environmental conservation for the purpose of protecting access to public lands.

C4WDA represents over 8,000 members and 160 member clubs. We are the largest organization of this type in California and represent owners of all makes and models of 4WD vehicles, as well as non-owners who support responsible vehicle-oriented recreation.

C4WDA's goal is to work with the land managers for responsible OHV access and recreation opportunities. We support the concept of managed recreation and strategies for the building and maintenance of sustainable and quality OHV recreation.

C4WDA has many members that are recreational visitors to the Oceano Dunes SVRA and are very concerned about actions that deal with the OHV recreation opportunity at Oceano Dunes SVRA.

C4WDA has read the draft EIR and is in full support of the Oceano Dunes SVRA and OHMVR Divisions plan to implement a five-year program to control and minimize emissions of dust and particulate matter that are generated at Oceano Dunes SVRA during periods of persistent winds.

C4WDA would also request that during this 5-year program the Oceano Dunes SVRA try to reduce the possible impacts to vehicular recreation opportunities caused by the implementation of the dust control measures.

C4WDA is a statewide organization with many clubs in the region around the Oceano Dunes SVRA and we ready and willing to volunteer our time and energy to help keep this important SVRA open.

C4WDA appreciates this opportunity to be involved in the public planning process on behalf of its members who enjoy recreation in the Oceano Dunes SVRA. Please contact me if you have questions or wish to discuss any aspect of these comments.

#### **Jeff Blewett**

Northern Natural Resource Consultant ndnrc@cal4wheel.com

J1

J2

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# 4.10 RESPONSE TO COMMENTS FROM THE CALIFORNIA 4 WHEEL DRIVE ASSOCIATION

The OHMVR Division received two comments from Jeff Blewett, Northern Natural Resource Consultant, California 4 Wheel Drive Association, Inc. In general, these comments were in support of the proposed Dust Control Program.

**Comment J1:** The California 4 Wheel Drive Association Inc. provides background information on the organization and expresses support for the proposed Dust Control Program.

*Response to Comment J1:* Comment noted. The OHMVR Division appreciates the California 4 Wheel Drive Association's support for the proposed Program.

**Comment J2:** The California 4 Wheel Drive Association Inc. requests the OHMVR Division reduce possible impacts to vehicular recreation opportunities caused by the proposed Dust Control Program and states a willingness to volunteer to keep Oceano Dunes SVRA open.

Response to Comment J1: The Draft Program EIR includes feasible mitigation measures to minimize the proposed Dust Control Program's potential impacts on OHV recreation opportunities. The OHMVR Division directs the California 4 Wheel Drive Association to Draft Program EIR, Mitigation Measure REC-1, as revised by this Final Program EIR (see Section 3.4), which requires the OHMVR Division to: minimize the loss of OHV recreation opportunities by planting vegetation outside of the open riding and camping area; employ dust control measures in a manner that doesn't interfere with Sand Highway and other established paths of travel; deploy seasonal dust control measures for only part of the year; consider OHV safety in the placement of dust control measures; integrate recreational opportunities (such as educational kiosks, maintaining motorized and non-motorized trails through large blocks of continuous vegetation and embedding OHV training or vendors in dust control measures large enough to support such areas); and, identify areas to provide additional camping or OHV recreation opportunity and diligently pursue opening those areas to OHV recreation. The OHMVR appreciates the California 4 Wheel Drive Association's support for Oceano Dunes SVRA.

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Jim Suty, President 15131 Garcal Drive San Jose, CA 95127 805-994-9309

E-mail: <u>jim@occanodunes.org</u> www.occanodunes.org

## By Hand Delivery

# COMMENT LETTER "K"

October 3, 2016

Ronnie Glick Senior Environmental Scientist Oceano Dunes District CDPR, OHMVR Division 340 James Way, Suite 270 Pismo Beach, CA 93449

> RE: Comments of Friends of Oceano Dunes on State Parks' draft Program Environmental Impact Report for the Oceano Dunes SVRA Dust Control Project

Dear Mr. Glick:

Please find below comments of Friends of Oceano Dunes (Friends) on State Parks' draft Program Environmental Impact Report for the Oceano Dunes SVRA Dust Control Program. Friends submits these comments with the disadvantage that Parks has not yet provided documentation in response to Friends' Public Records Act request. See Ex. 1. This impedes Friends ability to submit all comments.

- K1
- 1. In Section S.1.1, the EIR indicates that the Program Area consists of approximately 690 acres at Oceano Dunes SVRA. The EIR provides different acreages at different places in the document. Please clarify the exact acreage of the Program Area. Also in Section S.1.1, State Parks indicates that the dust program measures avoid U.S. Fish and Wildlife Service (FWS) designated critical habitat for the western snowy plover. However, FWS' plover critical habitat maps show that the habitat area extends inland from the mean high tideline approximately 1,372 feet. Ex. 2 and Ex. 3. This indicates that the Program Area falls within the plover critical habitat area. Please provide detailed maps to scale showing the relationship between the Program Area and the plover critical habitat area.
- K3
- Please clarify whether the area where additional trees may be planted downwind
  of Oceano Dunes SVRA falls within the Program Area.

**TK4** 

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3.	In Section S.1, State Parks indicates that it has applied for a Master Coastal Development Permit (CDP) from the California Coastal Commission (CCC) for the dust control program/project. It does not appear that the Coastal Act grants the CCC jurisdictional authority over this type of project, given that there is a certified LCP adopted by San Luis Obispo County. "After certification of its local coastal program or pursuant to the provisions of Section 30600.5, a coastal development permit shall be obtained from the local government as provided for in Section 30519 or section 30600.5." (PRC § 30600, subd. (d).) Please state all specific statutory authority that State Parks is relying on for submitting its Master CDP application to the CCC. Please also clarify what is meant by the term "master" CDP.	K5
4.	The EIR fails to inform the public if State Parks has had any discussions with private landowners regarding the planting of buffer trees on their property, the likelihood of reaching an agreement or the environmental consequences of such an agreement, if reached.	K6
5.	In Section S.1.1.4, the EIR fails to advise the public which "other agencies" must review the specific dust control activities to ensure compliance with the anticipated CDP. That section also fails to identify specific standards that State Parks would be required to comply with in the "annual review process."	[K7
6.	On page S-4 of the EIR, State Parks fails to identify specifically "other established paths of travel in the SVRA."	]K8
7.	On page S-4 of the EIR, State Parks fails to identify specific areas to provide additional camping or OHV recreational opportunities in order to offset the loss of OHV recreational opportunities caused by the program/project. State Parks also fails to identify a mitigation ratio, standard or guideline for offsetting the loss of OHV recreational areas caused by the program/project.	K9
8.	The EIR does not consider the combined impact on recreational opportunities of adding 100 acres of vegetation and the reduction of beach and foredunes due to long-term sea level rise.	[K10
9.	The EIR does not consider the combined impact on critical habitat of the western snowy plover and on habitat for the California least term of adding 100 acres of vegetation and the reduction of beach and foredunes due to long-term sea level rise.	[K11
10.	On page S-5 of the EIR, State Parks calculates the anticipated percentage loss in OHV recreation lands at Oceano Dunes SVRA based on an assumption that the current riding area amounts to 1,453 acres. However, in the EIR and in numerous other planning documents. State Parks calculates wildly different acreages for the	K12

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current OHV recreation area. As a result, it appears that State Parks has

other planning documents, State Parks calculates wildly different acreages for the

underestimated the percentage loss in OHV recreation lands at Oceano Dunes
SVRA that will result from the project/program.

- TK12
- On page S-5 of the EIR, State Parks admits that the loss of OHV recreation area anticipated to be caused by the project/program significantly conflicts with the policies in the SVRA's General Development Plan and Resource Management Plan. Therefore, the program/project may not proceed without an amendment to the General Development Plan and Resource Management Plan. The EIR provides no evidence that either plan has been amended or that the amendment process has commenced. On pages S-5 and S-6 of the EIR, State Parks states that the dust control program "could conflict" with the Coastal Act because recreation lands would be significantly impacted. It is not sufficient for the EIR to conclude that the dust control program "could conflict" with the Coastal Act. Rather, State Parks must make a determination as part of its duties under CEQA to determine whether its proposed dust control program either conflicts or does not conflict with the Coastal Act and/or the certified LCP. This is especially true since on page S-6 of the ETR, State Parks concludes that the program's impact to recreational opportunities will occur even with the implementation of design and mitigation measures proposed in the EIR.
- K13

K12

12. On page S-6 of the EIR, State Parks again asserts that the current riding area is 1,453 acres. Because other State Parks' planning documents use different current riding area acreage numbers, the EIR's analysis of the program's cumulative, seasonal and permanent impacts is flawed.

K15

13. On page S-6 of the EIR, State Parks admits that the magnitude of the loss of coastal recreation lands caused by the project/program does not enhance the recreational use at Oceano Dunes SVRA and therefore conflicts with the policies and the SVRA's General Development Plan and Resource Management Plan. Therefore, the project may not proceed without formal amendments to those plans. However, it does not appear that they can be amended in a way that is consistent with the SVRA Act.

K16

14. State Parks fails to consider the reasonable range of alternatives to the project/program. For instance, Friends submits herewith as Ex. 4 a report by an air quality consultant that concludes that the implementation of a series of staggered 50-foot-high fences with special netting would substantially reduce dust emissions from Oceano Dunes SVRA. The staggered fences could be located in an area closed to all public use and identified in yellow on figure 2-2 of the EIR. Such an alternative could eliminate the need to close any area currently available to OHV recreation or, at least, substantially reduce the area needed to be closed. The EIR considers simply reducing the OHV recreation area being closed, but does not do so in conjunction with the staggered fencing proposal described above. The proposal described above would eliminate or minimize the adverse impacts of the project/program to OHV recreation at Oceano Dunes SVRA, while still achieving the program/project's objectives. Variations on this proposal could

K17

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include expanded seasonal measures that are currently being employed by State Parks and as described in section S-1.3.2 of the EIR.

**⊺K17** 

Friends strongly objects to the alternative dust control program described in section S.I.3.3 of the EIR. Closing all QHV recreation lands within Occano Dunes SVRA would have a dramatic impact on the park's use and would be flatly inconsistent with the General Development Plan, the Resource Management Plan, the SVRA statute, PRC section 5090 et seq., and the Coastal Act. In its analysis of this alternative plan, State Parks erroneously presumes that it is feasible. To the contrary, in order to comply with CEQA, State Parks must evaluate whether such an alternative program is feasible. The alternative program would have significant impacts to biological resources including listed and sensitive species and their habitats. The EIR acknowledges this on page S-9 and this should be considered as part of the feasibility analysis. Selecting the alternative program also would violate PRC § 30007.5, since it would not be the most protective of significant coastal resources. ["The Legislature further finds and recognizes that conflicts may occur between one or more policies of the division. The Legislature therefore declares that in carrying out the provisions of this division such conflicts be resolved in a manner which on balance is the most protective of significant coastal resources."]

**K18** 

16. An additional alternative would be to use only temporary dust control mitigation measures. In other words, State Parks could climinate any expansion of vegetation islands. The advantage of this alternative, which was not examined in the EIR, is that it would not permanently affect recreational opportunities at Oceano Dunes. By contrast, planting more than 100 acres of permanent vegetation islands would forever prevent OHV recreation within those areas, contrary to the policies set forth in the General Development Plan, the Resource Management Plan, and in the organic statutes establishing SVRAs. Section 2.3.2.2 admits that seasonal, temporary dust control measures such as wind fencing and straw bales substantially reduce sand transport. Using temporary measures also would allow State Parks greater flexibility in responding to changing winds, changing environmental conditions, and on-the-ground success or failure.

K10

17. The EIR erroneously concludes that the No Action and the No Comprehensive Dust Alternative are the least environmentally damaging alternatives. In fact, the alternative suggested above by Friends would be the environmentally superior alternative. Therefore, the EIR fails to consider the least environmentally damaging alternative or the environmentally superior alternative.

**K2**0

18. In section S-1.4 of the EIR, State Parks fails to indicate whether the proposed annual review process would include measures to ensure public notice and participation in the process. Since the review process may result in changes to the program or project, the public should be given an opportunity to participate in that review and give input.

K21

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19. In section 1.3 of the EIR, State Parks identifies this EIR as a program EIR. It does so on the basis that it includes a series of actions that can be characterized as one large project and that are related geographically or in connection with the issuance of rules, regulations or plans. Under this definition, it is clear that State Parks' previous dust control activities dating back to the year 2010 are also part of the same series of actions that are related geographically, part of the chain in the contemplated action, and under the auspices of the same rules and regulations for stanutory authority. Therefore the EIR should analyze those related activities as well. It fails to do so. Because those activities are part of a series of actions, they would not be exempt from CEQA.

K22

20. In section 1.4.1 of the EIR, State Parks fails to identify San Luis Obispo County as a responsible agency for the proposed dust control program. San Luis Obispo County owns the La Grande Tract within Oceano Dunes SVRA. Much of the Program Area is on the La Grande Tract. The County, as the owner, therefore should be considered a responsible agency. The EIR is also unclear by indicating that the CCC, the San Luis Obispo County Air Pollution Control District (SLO APCD) and the California Department of Fish and Wildlife (CDFW) "may" be responsible agencies. State Parks needs to determine whether the CCC, the SLO APCD or CDFW are "responsible agencies" under CEQA. It cannot avoid the question by asserting that they "may" be responsible agencies.

K23

21. In section 1.4.2 of the EIR, State Parks fails to define what it means by the term "Master CDP." That term is not defined by the Coastal Act or Coastal Act regulations. Please state what provisions of the Coastal Act, or associated regulations, authorize "master" CDPs. The EIR also states that State Parks has applied for a CDP from the CCC "because the project involves development in the Coastal Zone." However, once there is a certified LCP, the CCC's jurisdiction appears to be limited to appellate jurisdiction. The EIR fails to state any provision in the Coastal Act that would grant the CCC original permit jurisdiction.

K24

22. In section 2.1 of the BIR, State Parks fails to define the term "maximum extent feasible" or the term "consistent with public safety environmental protection needs."

K25

23. In figure 2-1, the map fails to clearly delineate the County's boundaries.

TK26

24. Section 2.2.2 of the EIR indicates that vegetated dune areas slow the rate of dune advancement from a range of 6 to 18 feet per year down to a range of 1 to 7 feet per year. It also states that the slowing of the advancement is a naturally occurring process. Logically, because the proposed program/project would expand the vegetative dune areas by 100 acres or more, the program/project necessarily impedes, impacts and interferes with the natural dune formation process. The EIR fails to note that such interference is inconsistent with the Coastal Act, by interfering with the natural geological processes. See Public Resources Code section 30214.

**K27** 

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2		"no net loss of vegetation" at Oceano Dunes SVRA. The policy appears to be an illegal underground regulation, since State Parks did not adopt it in accordance with the Administrative Procedure Act. The policy also appears to be inconsistent with the policies adopted in the General Development Plan, the Resource Management Plan and other planning measures implemented at Oceano Dunes SVRA, as well as the SVRA Act, PRC section 5090 et seq.	K28
2	:6.	Table 2-1 of the EIR indicates that OHV recreation is allowed on approximately 1,450 acres. This figure is inconsistent with the recreational acreage identified elsewhere in the EIR.	<b></b> [K29
2	.7.	Please amend figure 2-2 to show the proximity of plover critical habitat to the proposed dust control Program Area. Please also indicate why the potential tree planting area is not considered part of the dust control Program Area. The Program EIR states that the tree planting may be part of the program and thus it should be included in the Program Area. Likewise, the environmental impacts should be evaluated at a program level.	K30
2	28.	Section 2.2.5 of the EIR indicates that visitation to the park is highest from late May through early September. Therefore, the program/project temporary measures are implemented and employed during the season of highest park visitation. As such, the FIR does not accurately or adequately discuss the constant impact of the dust control measures on OHV recreational access.	K31
2	29.	Please indicate on figure 2-3 the precise location of plover critical habitat to show the proximity of that habitat to the Program Area. Also please indicate areas of known least term habitat.	[K32
12	30.	In section 2.2.7 of the EIR, State Parks indicates that some of its previous dust control activities are considered to be part of the baseline environmental condition. By illegally exempting these activities from CEQA review, State Parks has illegally shifted the environmental baseline at the SVRA, and distorted the true environmental impacts of the dust control program/project.	K33
:	31.	In section 2.2.7.1 of the EIR, State Parks erroneously concludes that the seasonal installation of approximately 1,700 linear feet of wind fencing is an "ongoing activity" and thus considers it as part of the environmental baseline. This is an error. Because the wind fencing is installed anew each year it cannot legally be considered part of the environmental baseline under CEQA. The EIR fails to consider this and fails to consider the direct, indirect and cumulative impacts of this additional activity.	K34
	32.	Figure 2-4 of the EIR should be modified to a scale that allows the public to more clearly see where previous dust control measures have been installed or	K35

25. On page 2-5 of the EIR, State Parks fails to identify the specific policy regarding

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implemented at Oceano Dunes SVRA. The current scale is too small to analyze. Please also indicate in Figure 2-4 the plover critical habitat area and any areas of habitat for the California least tern so that the public can see the proximity of those areas both to the Program Area and the prior dust control measure areas. Please also indicate on Figure 2-4 any areas within the Program Area or within 500 feet of the Program Area that are considered to be wetlands (by the federal government or the Coastal Commission) or otherwise under the jurisdiction of the U.S. Army Corps of Engineers.

K35

 Section 2.2.7.4 of the EIR incorrectly concludes that the dust control measures implemented since 2010 at the SVRA are part of the environmental baseline. These projects have been incorrectly excluded from this EIR analysis. In addition, State Parks states on page 2-16 that it plans to retnove "as many straw bales as feasible" within a 30-acre straw bale area. However, State Parks fails to analyze this activity in the EIR. State Parks states that the 30-acre straw bale project was completed prior to the Notice of Preparation (NOP) for this EIR but clearly the removal of the straw bales was not completed prior to this EIR. State Parks further states in the EIR on page 2-16 that the removal of wind fencing over a 15acre area "has no potential to result in impacts." The EIR provides no basis or evidence for such a conclusion. Accordingly, such removal should be evaluated in this EIR and considered in the cumulative impacts analysis. State Parks also states that it used certain soil stabilizers on a two-acre area within the SVRA. The EIR notes that the CCC has rejected the use of soil stabilizers. Presumably, this is because their use results in significant environmental impacts. Yet, State Parks considers this adverse impact to be part of the environmental baseline rather than including that prior project as part of the series of dust control measures analyzed in this program EIR. That violates CEQA. Also, the use of soil stabilizers should be analyzed as the materials or chemicals may be harmful to visitors or sensitive species.

**K36** 

**K37** 

34. The EIR fails to consider the cumulative impacts of the previous dust control activities dating back to 2012. 2013: 12 information monitoring sites, see Emergency CDP G-3-13-0213 (ODSVRA Temporary Monitoring Program), p. 1; 2014: 45 acres of dust control measures - 15 acres of wind fencing and 30 acres of straw bales; 2015: 65 acres of dust control measures - 40 acres of wind fencing and 25 acres refreshing 2014 straw bales site. 2016: 61. 5 acres of dust control measures proposed - 1.5 acres porous roughness material, 40 acres wind fencing, and 20 acres straw bales.

**K**20

35. In section 2.3 of the EJR, State Parks states that it would plant new vegetation under this program during the fall "when rains support the establishment of native vegetation." However, this area of the state has been in a severe drought for at least the last five years and there has been little or no rain during the fall. Please provide annual rainfall figures at this location for the past 10 years. The EJR ignores the drought and ignores the likely need for substantial water transport or irrigation during the drought to support the establishment of new vegetation areas

K30

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on open sand dunes. (See Ex. 10.) Friends has retained an expert consultant who has submitted a report (attached as Ex. 5) that concludes that the amount of vegetation proposed by this program would require nearly five million gallons of water. State Parks has failed to identify any water source for such needed irrigation. State Parks has failed to identify the impacts to local water sources from such a heavy use of water during a drought. This fails to comply with CEQA. State Parks must show that future water supplies are reasonably likely to be available, and, if not likely to be available, what replacement sources are available. The EIR does not address or evaluate the reasonably foreseeable impacts of providing water to the project. Also, the introduction of that much water would likely attract additional species which will likely include more predators of listed and protected species.

K39

36. In figure 2-5, the plover critical habitat seems to overlap with the Program Area. Please provide a revised map based on a scale that shows more clearly the interaction or proximity between plover critical habitat, least term habitat and the Program Area. Please confirm that the critical habitat depicted on figure 2-5 is to scale and is based on official FWS maps.

K40

37. Page 2-20 of the EIR states that the Program Area avoids designated plover critical habitat. But the measurements identified in the FWS critical habitat designation maps indicate that there is some overlap between plover critical habitat and the Program Area. The EIR measurements confirm this.

K41

38. Please explain why in section 2.3.1.3 the lands for the tree planting area are not included in the proposed Program Area.

TK42

39. Section 2.3.2.1 admits that vegetation reduces sand movement. The EIR fails to consider whether this reduction in the sand movement adversely affects the natural geologic process of sand dune formation and therefore is inconsistent with the Coastal Act. That same section indicates that State Parks does not know whether "seedling" vegetation projects would be effective. Combined with the EIR's failure to consider drought conditions or adequate sources of water, it seems unlikely that the proposed vegetation seedling approach would be effective. That same section states that newly planted vegetation would primarily be in areas near or adjacent to where vegetation exists. It also states that vegetation in areas where no vegetation exists is less likely. However, since the EIR keeps both approaches open, the EIR must evaluate both approaches. It fails to do so adequately. In that same section, the EIR fails to evaluate the potential adverse impacts from using herbicide to remove non-native or exotic plants from the newly vegetated areas. See also Public Resources Code sections 5090.2, 5090.35, 5090.53 and 30214.

K43

40. In section 2.3.2.4, State Parks identifies additional soil stabilizers as an additional component of its dust control program. This seems inconsistent with the CCC's

K44

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- **⊺K44**
- 41. In section 2.3.3 of the EIR, State Parks states that it would give preference to locations most supportive of compliance with Rule 1001, "if all other factors are equal." State Parks does not indicate what it means by "if all other factors are equal." State Parks does not adequately describe how it would balance the demands of Rule 1001 and State Parks' other obligations under applicable land use laws and environmental laws. State Parks states that it "would emphasize projects that would avoid adverse effects on other... biological resources." State Parks does not adequately explain what it means to "emphasize projects that would avoid adverse effects." In fact, by stating that it would emphasize such projects indicates that it would not exclusively use such projects. In turn, that would mean certain projects would not avoid adverse effects on biological resources. Accordingly, such projects may have adverse impacts, including take, of listed species and/or their respective critical habitats. State Parks admits that vegetation projects would be a permanent form of dust control. State Parks asserts that it would avoid planting vegetation as much as possible in the open riding area. This statement is inconsistent with its statement just two paragraphs earlier in which it stated it would give preference to projects that are in compliance with Rule 1001. The EIR fails to explain or provide any meaningful criteria for determining whether State Parks intends to choose locations most supportive of compliance with Rule 1001 or locations that completely avoid and are most supportive of biological resources. Likewise, the EIR fails to explain or provide any meaningful criteria for determining whether State Parks intends to choose locations most supportive of compliance with Rule 1001 or whether State Parks intends to maximize and enhance OHV recreational opportunities as required by its organic statutes and land use planning documents.

K45

42. Figure 2-8 fails to clearly show the area designated as plover critical habitat. If the area designated as "high biological sensitivity" is the plover critical habitat area, please state whether a depiction is based on official FWS maps. The EIR should also indicate the distance between the critical habitat boundary and the Program Area boundary. Figure 2-8 is misleading to the public in that it attempts to show "conceptual" vegetation areas and seasonal control areas that may be quite different from where those areas ultimately are placed. As a result, there may be substantially greater impacts to biological resources and to OHV recreational areas than suggested by this program EIR. All of these same concerns also exist in figure 2-9. The EIR would be more accurate in assuming the entire Program Area may be covered with vegetation since vegetation could be placed anywhere in the Program Area.

K46

43. In section 2.3.4.1, State Parks states that it would plant vegetation outside of the open riding and camping area "to the maximum extent feasible." The EIR does not define what "to the maximum extent feasible" means in this context. This is particularly confusing given the many conflicting obligations and goals, i.e.,

K47

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conflicts between the organic SVRA statute, land use plans, land use laws, environmental laws, and Rule 1001. State Parks has failed to articulate which of the conflicting laws takes priority. Will ESA compliance trump Rule 1001 needs? Will SVRA Act requirements trump Rule 1001 requirements? Do land use plans trump Rule 1001 requirements?

K47

44. Friends strongly objects to the alternate dust control program scenario identified in section 2.3.4.2. In addition, it is inappropriate for the EIR to identify this scenario as the "worst-case" scenario given that this is only a Program EIR and the specifics have yet to be determined. Thus, the EIR should strike any reference to this being the "worst-case" scenario.

K48

45. Section 2.4 of the EIR makes clear that taken together, the seasonal dust control measures and the permanent dust control measures will ensure there are expansive dust control measures throughout the year. Specifically, the EIR states that vegetation projects will be planted in the fall, and seasonal measures would be deployed beginning in March and remain in place until September 30. Thus, at the very time that State Parks is removing seasonal dust control measures it will be implementing new permanent control measures. OHV riding activity will be impacted every month of the year. The EIR does not adequately discuss this or consider this impact to OHV recreation.

K49

46. Friends objects to section 2.4.1 of the EIR in that the proposed dust control annual review process does not provide for public notice, review or input. It is essentially a hidden, behind-the-scenes review process, with no public hearings. Since this is a public project subject to CEQA, there should be opportunities for greater public oversight and input in a process expressly designed to change the project during operation.

K50

47. The EIR appears to designate State Parks as both a lead agency and a trustee agency under CEQA. Please clarify the significance of State Parks assuming this dual role and any conflicts on the roles.

K51

48. State Parks appears to be proposing "standard project requirements" in its mitigation program as noted in section 2.5. State Parks states in section 2.5 that as a trustee agency, it has the responsibility to ensure that actions that protect both the cultural and natural resources "of the State Parks' system" are "always taken on all projects." State Parks also indicates that the mitigation included here is "based on" State Parks' "standard requirements," which may or may not be modified. State Parks then appears to incorporate certain Standard Project Requirements, or SPRs, into the mitigation for this project. To the extent that these SPRs include standard requirements used in all similar situations, State Parks needs to identify which specific elements are "standard requirements." With respect to "standard requirements," State Parks needs to state the source of the "standard requirement." In other words, is it a regulation, policy, guidance, custom, practice or protocol? What is the specific citation?

K52

49. To the extent that any standard project requirements are of general applicability to the State Parks' system, they are therefore a regulation under the Administrative Procedure Act. All regulations under the APA most be adopted in accordance with APA notice and procedures. If not, they are void. Thus any standard project requirements incorporated into this EIR which have not been adopted as regulations through the APA procedures are void and should not be considered or adopted as part of this EIR.

K53

50. Table 2-5 indicates one of the standard project requirements is to design the dust control program "to disturb and occupy as little land as possible." Again, the EIR is not clear on how State Parks intends to comply simultaneously with its obligations under the SVRA Act, land use law and plans, environmental law and Rule 1001. These taws appear rife with conflict.

K54

51. Table 2-5 on page 2.36 also discusses standard project requirements for biological resources. One such SPR is to "restore all disturbed areas to the maximum extent feasible." State Parks fails to define what it means by "the maximum extent feasible." Also, if State Parks disturbs areas that are habitat or critical habitat of a sensitive or listed species, restoring the area "to the maximum extent feasible" may nonetheless result in a take of the species, which is contrary to the California Endangered Species Act (CESA) and the federal Endangered Species Act (ESA). This SPR therefore is inconsistent with the avoidance requirements and principles in both the state and federal Endangered Species Acts.

K55

52. In table 2-5, State Parks also proposes as an SPR that a qualified biologist survey for the presence of special-status plants within 100 feet of work areas. The EIR fails to discuss or analyze typical, customary or applicable FWS or CDFW protocols in terms of buffer areas around special-status and listed plants. The EIR is devoid of substantial evidence to establish that a 100-foot buffer is adequate. In addition, State Parks includes an SPR that the qualified biologist "map, flag and protect" special-status plants during surveys. The SPR fails to define what it means for a qualified biologist to "protect" a plant. No measurable or definable criteria are provided. In addition, table 2-5 provides an SPR that the qualified biologist shall establish a clear avoidance area around a special-status plant of a minimum of 25 feet from all work activities. The EIR is devoid of substantial evidence to establish that a 25-foot avoidance area is adequate.

K56

53. Table 2-5 also appears to establish an SPR for the replanting or restoration of disturbed areas where it is not feasible to avoid the loss of special-status plants. The SPR fails to identify any standard for compensating this loss or any criteria for determining such a standard.

K57

54. Table 2-5 also attempts to establish SPRs for special-status amphibians and reptiles. The same deficiencies that were identified in the plant SPRs also appear in the amphibian and reptile SPRs, i.e., inadequate and unsupported buffer areas.

K58

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- 55. In table 2-5, State Parks also attempts to establish SPRs for impacts to the California red-legged frog. Here, the standard purports to leave the determination of the appropriate size buffer entirely within the hands of an unspecified biologist, without any requirement that the biologist follow FWS or CDFW protocols, guidelines, requirements or standards. Further, the frog SPR makes no effort to establish any specific standard itself.
  56. In table 2-5, State Parks purports to create SPRs for special-status birds. Under this SPR, State Parks itself establishes a buffer zone of nests of special-status
- 56. In table 2-5, State Parks purports to create SPRs for special-status birds. Under this SPR, State Parks itself establishes a buffer zone of nests of special-status birds but leaves the size of the buffer in the hands of an unspecified biologist, without any requirement to follow FWS or CDFW protocols, standards, guidelines or criteria. It also purports to conclude that a 50-foot buffer around bird species is adequate, which is contrary to FWS protocols for many listed and special status birds.
- 57. In table 2-5, State Parks also purports to create SPRs for impacts to wetlands. The SPR is devoid of substantial evidence supporting the minimum buffer areas and setback areas created and the buffers proposed appear contrary to state and federal laws protecting wetlands.
- 58. State Parks' SPRs for special-status birds does not appear to distinguish between sensitive birds, birds listed as endangered or threatened under state or federal Endangered Species Acts or fully-protected birds under state law. For that reason, the proposed SPRs violate both state and federal endangered species and other species laws.
- 59. Table 2-5 also describes the proposed SPRs in a way that appears to allow dust control activities in the close vicinity of special-status birds, which may interfere with their normal breeding activity, resulting in harm and a take of the species. The SPRs also acknowledge that the dust control program activities "could facilitate predator movement" into known nesting areas for the plover and tern. Yet, the SPRs simply require that the facilitation of predator movement be "minimized." Minimization virtually ensures that additional predator take will result from the dust control activities. This in turn demonstrates that the dust control activities will in fact result in the take of listed species such as plover and least tern. Further, the SPR admits that avoidance may not be feasible. For this reason, the SPR and the dust control program are not consistent with the federal Endangered Species Act or the California Endangered Species Act. Also, the California brown pelican remains a fully protected species under state law and the EIR contains no analysis of the potential take of that species from the dust control measures or resulting increase in predator movement into sensitive areas.
- 60. State Parks neglects to create any SPR to control likely increased predation by red foxes, coyotes, skunk and opossum that will use the additional 100 acres of vegetation as cover for their predation of plover and term. Friends submits

K64

K63

K60

K65

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	herewith a biological analysis as Ex. 6. It shows that there will be increased predation from mammals as a result of 100 acres of additional vegetation that will provide excellent cover for red foxes, coyotes and other predators.	K65
61.	Section 2.6 of the EIR admits that the proposed project is within the jurisdiction of Grover Beach and San Luis Obispo County, and that those entities have LCPs that have been certified by the CCC. To promote efficiency and goodwill between agencies, and prevent injurious reliance by property owners, State Parks and the Commission should consider the contents and findings of the certified land use plan.	K66
62.	Section 3.1 of the EIR illegally incorporates the SPRs even though many of the SPRs are underground regulations in violation of the APA.	[K67
63.	The proposed dust control program is inconsistent with State Parks' mandate to expand long-term OHV recreational opportunities in areas. Public Resources Code section 5090.02(e)(1).	
64.	Oceano Dunes SVRA was established in an area that is uniquely suited for OHV recreation. It cannot be replicated or replaced. Thus, permanently removing portions of that area through the planting of vegetation islands conflicts with Public Resources Code section 5090.02(c)(1).	K68
65.	The dust control program conflicts with Public Resources Code sections 30001.5 and 30210 because it fails to maximize access and recreational opportunities on the coast. Removing more than 100 acres of prime recreational coastal lands through the planting of large and impermeable vegetation islands fails to maximize access and recreational opportunities at the SVRA.	K69
66.	The dust control program conflicts with the California Constitution's right of public access to the beach by imposing barriers in the form of 100 acres of new vegetation islands. (Art. 10, section 4.)	[K70
67.	Planting of more than 100 acres of permanent and impermeable vegetation islands is development that interferes with the right of access to the sea, contrary to Public Resources Code section 30211. A primary focus of the Coastal Act's public access and recreational policies is the direct physical impedance of access.	K71
68.	The dust control program is inconsistent with Public Resources Code section 30214 in that it creates obstacles and barriers to public access by changing topographic and geologic site characteristics of the SVRA. See Public Resources Code Section 30255.	K72
69.	The dust control program is contrary to Public Resources Code section 30223 in that it fails to reserve coastal upland areas necessary to support recreational uses	K73

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	highlands.	<sup>⊥</sup> K73
70.	The dust control program is inconsistent with the Coastal Act by allowing additional development in and adjacent to environmentally sensitive habitat areas as defined in the Coastal Act and defined and designated in the applicable certified LCP. The EIR provides no reasoning or basis for ignoring, disregarding, or refusing to follow the LCP's designation and mapping of ESHA. Jonna Engel, PhD, is a staff ecologist for the California Coastal Commission. She gave a presentation on September 22, 2016 in Los Angeles on ESHA and wetlands. During her presentation, she stated that "bare sand can be ESHA because it is so rare." (Ex. 3.) She also stated "most ESHA is disturbed." The EIR ignores this. Also, PRC section 30240 does not permit a process by which the habitat values of an ESHA can be isolated and then recreated in another location. The statute protects the area of an ESHA from uses which threaten the habitat values which exist in the ESHA. Importantly, while the obvious goal of section 30240 is to protect habitat values, the express terms of the statute do not provide that protection by treating those values as intangibles which can be moved from place to place to suit the needs of development. Rather, the terms of the statute protect habitat values by placing strict limits on the uses which may occur in an ESHA.	K74
71.	While the EIR notes that Oceano Dunes SVRA is more frequently used than any SVRA in the state park system, it inappropriately discounts the impact on those users by further reducing the lands available for OHV recreation within Oceano Dunes SVRA. Oceano Dunes SVRA is already the third smallest SVRA in the state, in terms of acreage, even though it is by far the most visited in the state. The dust control program will further exacerbate this condition. As table 4-3 acknowledges, the lands available at Oceano Dunes SVRA for OHV recreation have already been reduced from 3,497 acres to 1,224 acres. See also Figure 4-1.	K75
72.	The EIR fails to identify the location of lands within the SVRA that are owned by Phillips 66.	∐ K76
73.	On page 4-11 of the EIR, State Parks acknowledges that the beach and dune oriented recreational opportunities at Oceano Dunes SVRA are coastal dependent recreational activities that fall within the definition of coastal dependent development or use as that term is used in Public Resources Code section 30101. As such, these uses should be protected and given priority under the Coastal Act.	K77
74.	Section 4.2.3.1 indicates that there are 1,530 acres open to vehicular recreation, an acreage that's inconsistent with similar statements elsewhere in the EIR.	∐ K78
75.	Oceano Dunes SVRA also provides more than 1,000 campsites on the beach, which is a unique resource in California. The camping fees are low cost compared to other facilities in the state, and thus are consistent with Public Resources Code	K79

by planting more than 100 acres of permanent and impenetrable vegetation

section 30213, which states that lower-cost visitor and recreation facilities shall be protected, encouraged, and provided.

|K79

In section 4.3.2, the EIR admits that the dust control program and project elements "would occupy open sand areas in the SVRA where OHV recreation currently occurs." The EIR further acknowledges that the areas covered by the program would expand each year. The EIR further acknowledges that the area covered may be even greater if the alternative program is implemented. See EIR, p. 4-22. However, State Parks miscalculates and misrepresents the percentage of lost acreage due to the program, which causes the EIR to underestimate the impact on OHV recreation. The EIR does acknowledge other factors that need to be considered, such as the site's history, popularity, and unique coastal recreational opportunity, plus the tack of similar facilities in the state. The EIR also acknowledges that this experience has been substantially limited and reduced over time. In order to address these impacts, the EIR proposes certain mitigation measures, such as planting vegetation outside the open riding and camping areas, planting vegetation outside of the "Sand Highway," employing seasonal dust control measures, and identifying other areas to provide camping and OHV recreation. State Parks fails to either identify specific areas to provide additional camping or OHV recreational opportunities in order to offset the loss of OHV recreational opportunities caused by the program/project. State Parks also fails to identify a mitigation ratio, standard or guideline for offsetting the loss of OHV recreational areas caused by the program/project.

K80

77. On page 5-1, the EIR is unclear whether it is applying the standards from the certified LCP to its analysis.

K81

78. If the CCC has jurisdiction over this project, Friends previously requested evidence from State Parks and the CCC that it had complied with Public Resources Code section 30601.5 by inviting all persons and entities with a property interest to be co-applicants in any such permit. Under State Parks' theory, this would include San Luis Obispo County, Phillips 66 and an array of private property owners who own parcels within the defined Program Arca. (See Ex. 7.) Even assuming that the CCC has jurisdiction to process this CDP, it still could not do so without first complying with Public Resources Code 30601.5.

K82

79. The proposed dust control program is inconsistent with the Pismo State Beach and Pismo Dunes SVRA General Development Plan and Resource Management Plan. For instance, the General Development Plan identifies the dunes as "ideal for off-road vehicle operation." It also states that the SVRA was established "to make available to the people opportunities for recreational use of off-road vehicles in a large area of unstabilized sand dunes exceptionally adapted to this recreational activity..." (p. 43) In addition, the General Development Plan states that State Parks will manage the SVRA "in ways that perpetuate and enhance the uses and values enumerated in the Declaration of Purpose," i.e., making the area available for off-road vehicle use. The General Development Plan does provide for the

**K83** 

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	preservation of vegetation islands that existed at the time that the SVRA was formed. (p. 43) The General Development Plan also emphasizes the continuation of beach camping. In 1994, the General Development Plan was amended and updated. The dust control program must also comply with the standards adopted in the General Development Plan amendment.	K83
80.	The EIR admits in section 5.1.2 that after the CCC certifies a LCP, the CCC's permitting authority is delegated to the local government. The EIR agrees that the CCC has appeal authority, not original permit authority, except for original permit jurisdiction over development on tidelands and public trust lands in the Coastal Zone. However, the EIR ignores this finding in the balance of its analysis. It appears to assert that the CCC has jurisdiction over the CDP permitting process. The EIR is internally inconsistent on this point.	K84
81.	In table 5-1, the EIR repeatedly determines that the dust control program "may not be consistent" with various provisions of the Coastal Act. State Parks has an obligation to determine through the EIR process and otherwise whether the dust control program complies with the Coastal Act or not. It cannot simply determine that the project "may not be consistent." It needs to make a determination as to whether it believes it is consistent or not consistent. The information and analysis in the EIR clearly demonstrates that the dust control program is not consistent with numerous provisions of the Coastal Act, including Public Resources Code sections 30210, 30213, 30214, 30223, 30240, 30251, 30253 and 30255. Thus, State Parks should include that finding in order to comply with CEQA. Further, State Parks ignores PRC § 30007.5 ["The Legislature further finds and recognizes that conflicts may occur between one or more policies of the division. The Legislature therefore declares that in carrying out the provisions of this division such conflicts be resolved in a manner which on balance is the <i>most protective of significant coastal resources.</i> "]	K85
82.	The dust control program violates Public Resources Code 30213 because it does not maximize recreational opportunities and low-cost visitor and recreation facilities; nor does it protect, encourage, or provide them.	[K86
83.	The dust control program violates Public Resources Code 30214 because it impedes the natural dune formation process, which would substantially adversely impact the SVRA topography and geologic site characteristics.	_K86 _K87
84.	The dust control program violates Public Resources Code 30223 by permanently removing upland areas necessary to support coastal recreational uses.	[K88

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85. The dust control program violates Public Resources Code section 30240 by

vectors for increased predator activity and predation of listed species.

creating 100 acres of additional vegetation islands that will serve as cover and

- 86. The dust control program violates Public Resources Code section 30240 by purporting to authorize dust control activity, measures, equipment and development in ESHA even though the dust control program is not a "use dependent on those resources." The Program Area is entirely ESHA. (See Ex. 8.)
- 87. The dust control program violates Public Resources Code section 30240 by purporting to authorize dust control activity, measures, equipment and development in ESHA even though it would create a significant disruption of habitat values as explained herein.

K90

- 88. State Parks and the CCC have de facto illegally amended the County LCP by purporting to authorize unlawful development within ESHA.
- 89. The dust control program violates Public Resources code section 30251 by introducing artificial dust control measures including wind fencing and other similar measures that are visually inconsistent with the natural dune environment, substantially impeding scenic and visual resources in the coastal area in the SVRA.

K91

 The dust control program violates Public Resources code section 30255 by supplanting coastal dependent uses with 100 acres of vegetation islands where those uses currently exist.

K92

91. The dust control program is inconsistent with the Oceano County Airport Land Use Plan.

TK93

State Parks has violated the Oceano County Airport Land Use Plan (ALUP) by failing to submit a dust program to the Airport Land Use Commission (ALUC) to make a consistency determination. Page 3 of the ALUP reads as follows: "Review of Specific Proposed Development Projects - Review of proposed individual development projects is not a responsibility mandated to the ALUC by the Public Utilities Code when such projects do not require adoption of or amendments to a general or specific plan, zoning ordinance, or building code. The ALUC may, however, review individual development projects when they have been referred by a local agency or under the terms of an agreement with a local agency. In San Luis Obispo County, the General Plan and supporting planning instruments do not incorporate detailed provisions for land use or development in the vicinity of the Oceano County Airport, but rather state that such development must be consistent with the ALUP. Since no body other than an ALUC is empowered by state law to make a determination of consistency with respect to an adopted ALUP, all individual projects within the Airport Planning Area require review by the ALUC. This has, in fact, been the historical practice in this County." Page 15 of the ALUP reads, in part: "Policy G-1 ALUP right of review - No project or land use may be established within the Airport Planning Area nor may any building or use permit be issued for a proposed development unless the proposed project or land use has been reviewed by the ALUC of San Luis Obispo

**K**94

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County and has been determined by that Commission to be consistent with this
ALUP. If a project has been determined by the ALUC to be inconsistent, the
project or land use may not be established and no building or use permit may be
issued for such project or land use unless and until"

K94

93. For many years, State Parks has been negotiating a Habitat Conservation Plan for Oceano Dunes SVRA. The EIR should discuss potential requirements of that plan as they may interact with the dust control program and the mitigation measures proposed in this EIR.

K95

94. On page 5-15, the EIR admits that the dust control program conflicts with the General Development Plan and the Resource Management Plan for Oceano Dunes SVRA. Because the EIR identifies this as a significant and unavoidable impact, State Parks is required to amend the General Development Plan and Resource Management Plan prior to commencement of this project.

K96

95. On pages 5-16 through 5-18, the EIR continues to avoid finding that the dust control program conflicts with the Coastal Act even though its analysis shows that it does. By taking this ambiguous position, the EIR inadequately alerts the public to the consequences of the dust control program and therefore violates CEQA. In addition, because the EIR clearly establishes that the dust control program, even with mitigation, is not consistent with multiple divisions of the Coastal Act, neither the local jurisdiction nor the CCC may approve this project.

K97

96. On page 5-18, State Parks purports to make determinations regarding conformity or consistency with the applicable airport land use plan when this determination is expressly reserved to the appropriate ALUC. Ironically, State Parks refuses to make a determination on Coastal Act consistency when it should, but then makes an Airport Land Use Plan consistency determination when it shouldn't.

K98

97. State Parks' proposal to color the wind fencing green is insufficient to make the wind fencing "visually compatible" with the character of the surrounding area, as required by Public Resources Code section 30251. For instance, if this fencing were proposed as part of a housing development, the CCC would never approve such fencing simply because it was colored green. By way of example, recently the CCC staff rejected in discussions much less visually intrusive fencing on a hotel resort project in Sand City, California.

K99

98. State Parks' visual quality analysis is inadequate. The analysis provides only a handful of viewpoints for a 690-acre Program Area. By contrast, the CCC in other projects located on less than a 40-acre parcel has required substantially more viewpoints. Ex. 3. To be consistent with the CCC's usual practice (on an acreage basis), a 690-acre site should have a viewpoint analysis that includes between 60 and 120 viewpoints.

K100

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99. Figure 6-10 and 6-11 show that the proposed temporary measures would have a substantial visual impact on the site and is not visually compatible with the surrounding environment. This is also shown in figure 6-12. The EIR acknowledges on page 6-21 that the proposed seasonal dust control measures are neither native nor common to the natural dune landscape. It is also inappropriate for State Parks to speculate without substantial—evidence, whether certain park visitors may or may not be sensitive to visual changes caused by the dust control measures. That is not the standard under the Coastal Act. Another example of the dramatic impact of the dust control measures on visual resources is reflected in figure 6-13. Figure 6-14 shows the expanded vegetation and makes clear how this would provide additional protection to predators.

K101

100. Figure 6-15 shows that merely coloring the artificial wind fencing does not remedy the significant impact on visual resources so that it is compliant with the Coastal Act.

K102

101. The EIR fails to specify which fully protected species under the California Fish and Game Code may be adversely affected by the dust control program.

K103

102. The EIR indicates that there are wetlands within the Program Area. However, the EIR does not indicate that State Parks in any way consulted the U.S. Army Corps of Engineers in determining whether any waters of the U.S. or areas under the jurisdiction of the U.S. Army Corps of Engineers may be affected by the dust control program. It doesn't appear that there has been any wetlands delineation under federal protocols (3 parameter) or Coastal Commission (one parameter) protocols. State Parks needs to do both to comply with federal and state law, Have soil pits been dug? The EIR does not provide adequate information either in narrative or graphic form to show where within the Program Area the wetlands exist, or may exist. Furthermore, because State Parks does not presently know precisely where either the permanent or seasonal dust control measures will be placed, it cannot conclude whether the wetlands will be affected. Similarly, it cannot now conclude whether a Section 404 permit will be required. And finally, the EIR fails to indicate whether compliance with NEPA is necessary given the potential impact to wetlands. If wetlands are affected, then NEPA compliance will be required. Also, a consistency determination will be required to comply with the Coastal Zone Management Act, 16 USC sections 1451-1464, and its implementing regulations. Also, Pub. Res. Code section 30233(a) limits impacts to wetlands. The project does not appear to comply with section 30233(a) since it is quite possible that the project will result in discharge or fill of those areas. In addition, CCC policies require wetland buffers of up to 200 feet. Finally, the EIR fails to take analyze whether the drought has concealed wetlands that will reemerge once the drought ends. The Army Corps and FWS have protocols to address this. Annual precipitation shifts can impact accurate delineation. Modifications to the area can also impact defineation. The EIR fails to consider these factors, or discuss them.

K104

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103.	FWS has determined that critical habitat for La Graciosa Thistle within Oceano Dunes SVRA (Unit 1) is occupied. 74 Fed. Reg. 56978-57046 ["Unit 1 was occupied at the time of listing, is currently occupied, and contains the physical and biological features essential to the conservation of the species" [["best available science at that time indicated that Cirsium lonchologis [is] still extant at a number of locations throughout its range."] This EIR conflicts with this finding. See p. 7-10.	K105
104.	La Graciosa thistle is listed as threatened by the state of California, which means that killing or possessing the plant is prohibited by the California Endangered Species Act (CESA).	[K106
105.	On page 7-14, the EIR fails to adequately disclose, analyze and address the impact of predation on the western snowy plover. Because of this failure, the EIR underestimates the impact of expanding vegetation by 100 acres on predation of the western snowy plover. This same flaw exists with respect to the California least tern analysis.	K107
106.	The EIR contains no significant analysis of predators or predation of the western snowy plover and the California least tern. It fails to acknowledge that significant predation has occurred due to red foxes, coyotes, skunk and opossum. It fails to consider that adding 100 acres of vegetation will provide substantial ground cover that will allow red foxes, coyotes, skunk and opossum to hide and prey on existing species such as the western snowy plover and the California least tern. See Ex. 6.	K108
107.	In section 7.3.2, State Parks again seeks to create standard project requirements, which would appear to apply to projects within the state park system generally. As such, these SPRs violate the APA and are illegal underground regulations, as described previously.	K109
108.	One of the SPRs is to disturb and occupy as little land as possible. The EIR does not explain how this can be implemented in light of Rule 1001 requirements. It also proposes a SPR of restoring all disturbed areas to the "maximum extent feasible" and fails to define what "maximum extent feasible" means. It also ensures that disturbed areas within critical habitat will not be restored to their original condition, which may result in harm to listed species.	K110
109.	Since there is the potential for the tree planting to be included in the Program Area, State Parks and the CCC should invite the landowners to be project applicants.	[K111
170	In continue 0.0 A die DID describes die Describe Aus en 0.05 auch 70 is Cours in	Τ.

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110. In section 8.2.4, the EIR describes the Program Area as 985 acres. This figure is

inconsistent with previous statements that the Program Area is 690 acres.

[K112

- 111. On page 9-9, the EIR concludes that State Parks is not proposing to place fill in regulated waters. However, because wetlands exist within the Program Area and because the Program Area may yet expand due to tree planting, the EIR has no reasonable basis to conclude that fill would never be placed in a wetland.
- K113
- 112. The EIR attaches a March 6, 2015 letter from CDFW. The comment letter fails to provide a comprehensive list of sensitive and listed species that may be affected by the dust control program. The proposed mitigation measures articulated by CDFW are virtually nonexistent and provide little or no guidance to State Parks. They amount to little more than suggesting that a biologist conduct surveys prior to implementation of a dust control program. If this were a housing development project, one could not imagine CDFW having so few comments, given the level of impacts already identified by State Parks. CDFW failed to protect La Graciosa thistle, a threatened species under state law, or the brown pelican, a fully protected species. CDFW has completely failed in its responsibilities as a trustee under CEQA. In addition, CDFW has exceeded its jurisdiction by "encouraging" State Parks to implement the dust control program. CDFW's authority is limited to recommendations regarding impacts to biological resources. It has no standing or authority to encourage another agency to move forward or not to move forward with something that has nothing to do with biological resources and has no impact on biological resources. CDFW should spend less time being a cheerleader and more time doing its statutorily required job.

K114

113. The EIR includes also a March 9, 2015 letter from the CCC. The CCC opines, in agreement with Friends, that State Parks has failed to develop or consider a full range of potential project alternatives.

K115

114. Page 7-14 of the EIR states that the plover critical habitat extends more than 1,300 feet inland. Elsewhere in the EIR the document states that the program area boundary is between 1,000 and 1,500 feet inland. This strongly suggests that there are locations where the program area extends into the plover critical habitat designated by FWS.

K116

115. Page 7-5 of the EIR states that "the western boundary of the Program Atea is set back from the Pacific Ocean by approximately 1,000 feet in the vicinity of marker post four and five to 1,500 feet in the vicinity of marker post seven to avoid western snowy plover critical habitat." This is misleading. The Pacific Ocean is not the boundary of critical habitat for the plover. In fact, the plover critical habitat reaches very far inland because the FWS wanted to take into account alleged seal level rise 100 years from now.

K117

116. The EIR does not evaluate how adding 100 acres of vegetation would affect emergency access for first responders. The dust control program violates Public Resources Code section 5090.3 subsection c by establishing what is effectively a natural preserve or wilderness area within the SVRA.

K118

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117. The dust control program violates Public Resources Code section 5019.62 by including new improvements within the SVRA, which do not directly enhance the public enjoyment of the natural scenic cultural, ecologic values of the seashore.

K119

118. The dust control program violates Public Resources Code section 5090.02(c) by failing to expand opportunities for OHV recreational activity within the SVRA.

K120

119. The dust control program violates the Coastal Act and the applicable certified LCP by de facto removing the environmentally sensitive habitat area determination contained in the LCP when analyzing the consistency of this program/project with the Sau Luis Obispo County LCP. To promote efficiency and goodwill between agencies, State Parks and the Commission should consider the contents and findings of the certified LCP. To the extent that there is a conflict between the LCP and the Coastal Act; the Coastal Act should prevail.

K121

120. The dust control projects are inconsistent with the LCP policies and standards. For instance, Policy 29 protects terrestrial environments in SLO County's coastal zone, which includes unique plant habitats and rare and endangered animal habitats: "Designated plant and wildlife habitats are environmentally sensitive habitat areas and emphasis for protection should be placed on the entire ecological community. Only uses dependent on the resource shall be pennitted within the identified sensitive habitat portion of the site." (LCP, at 6-16 to 6-17.) Even development adjacent to ESHA areas and "holdings of the State Department of Parks and Recreation shall be sited and designed to prevent impacts that would significantly degrade such areas and shall be compatible with the continuance of such habitat areas." (Id. at 6-17.)

K122

 The dust control program violates and is inconsistent with the San Luis Obispo County General Plan. K123

122. The EIR failed to consider substantial new information and data as described in this comment letter, thus triggering the need to recirculate the draft EIR as required by Public Resources Code section 21092.1. All of the information included in this letter and not adequately discussed or not at all discussed in this EIR lead to new or greater impacts compared to what's described in this draft EIR. In addition, as set forth in this letter, the EIR failed to consider a feasible alternative that would reduce impacts, and therefore recirculation is required.

K124

123. CDFW has exceeded its authority in its comments. CEQA establishes specific limitations on the scope of EJR comments by public agencies. Any public agency may comment on a draft EIR for a project that will affect resources within the agency's expertise, 14 Cal Code Regs section 15209. A reviewing agency must, however, limit its comments to project activities that are within its area of expertise, PRC 21104 (c); 14 Cal Code Regs sections 15086(c), 15204(d). Also, comments must be supported by documentation – CDFW did not. Pub. Resources Code section 21104 (c) 21153, 14 Cal Code Regs section 15086(c).

K125

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124.	The EIR is internally inconsistent. On the one hand, it says that the dust control program conflicts with many Coastal Act policies but then concludes that the CCC might find it consistent with the Coastal Act.	K126
125.	Friends request that State Parks include as appendices all relevant plans and policies.	[K127
126.	species.	∐K128
127.	The provisions of Public Resources Code section 30601 apply only to those cases where there is not a certified LCP.	[K129
128.	Under Public Resources Code section 30601.5, a CDP applicant must "demonstrate a legal right, interest, or other entitlement to use the property." The EIR fails to disclose on what legal basis State Parks has jurisdiction over the La Grande Tract, i.e., is there a lease or some other interest in the property. Friends requests that State Parks include a copy of that document in the EIR.	K130
129.	A program EIR should contain a sufficient degree of analysis, in the light of what is reasonably feasible, to provide decision makers with information that enables them to make a decision which intelligently takes account of environmental consequences. Center for Biological Diversity v. Department of Fish and Wildlife (2015) 234 Cal.App.4th 214, 234. For the foregoing reasons, this Program EIR does not meet that standard.	K131
130.	Given the extent of noncompliance with the Coastal Act and the certified LCP, no set of terms and conditions imposed on any permit could ensure that the development will be in accordance with the Coastal Act and LCP. The Commission may only grant coastal development permits in compliance with the Coastal Act.	K132
131.	The EIR indicates there will be multiple 33-foot towers with monitoring equipment. (p. 2-24.) The Federal Aviation Administration requires that it be notified if a person plans to erect a structure that may affect navigable airspace. Such notification extends to structures that "may cause electromagnetic interference to aircraft" or "may cause transmitted signals to be reflected upon ground-based or airborne air navigation communications equipment, or affect instrument procedures." Even temporary equipment falls within this requirement. Also, if any towers have lighting, FAA review is necessary. State Parks has not indicated whether it has notified the FAA or consulted with that agency regarding the monitoring equipment. Oceano Dunes SVRA falls within areas assessed for	K133

Friends of Occaso Dunes is a 501(a)(3) California Not-for-Profit Public Benefit Corporation, comprised of over 28,000 supporters. We represent environmentalists, equestrians, campers, fishermen, families and off-road enthusiasts who enjoy the benefits of Public Access through Responsible Recreation at the Oceano Dunes State Vehicular Recreation Area (ODSVRA). We want to maintain Access For All!

airport safety. Civil penalties may be imposed for failure to notify the FAA.

132. The EIR does not discuss whether the monitoring equipment or the placement towers require approval of the Federal Communications Commission, or whether the structure is subject to FCC licensing requirements.

K134

133. State Parks has violated CEQA by engaging in unlawful "segmentation" of the project by dividing up the overall dust control program into separate annual subprojects even though those actions are an integral part of the overall program and located in the same program area.

K135

134. Noncompliance with law renders EIR invalid. State Parks cannot use an unlawful EIR to approve a project that violates the law. The dust control program is not lawful because it violates the Coastal Act, the federal Endangered Species Act, the California Endangered Species Act, the SVRA Act and the San Luis Obispo County General Plan and LCP, as well as State Parks governing General Development Plan and Resource Management Plan (as described herein).

K136

Sincerely

Jim Sutv

President - Friends of Oceano Dunes

CC: Tom Roth, Esq. FR1ENDS Board of Directors

## 4.11 RESPONSE TO COMMENTS FROM FRIENDS OF OCEANO DUNES

The OHMVR Division received 136 comments from Friends of Oceano Dunes (FOOD) on a wide variety of topics and issues contained in the Draft Program EIR. Friends of Oceano Dunes also submitted Exhibits 1 – 10 with their comment letter. These exhibits, which comprised more than 340 pages of material, contained information and evidence referenced in Friends of Oceano Dunes main comments on the Draft Program EIR. The OHMVR Division has reviewed these exhibits and concluded they do not constitute significant new information, nor do they substantially change the EIR's analysis and conclusions regarding the potential impacts of the proposed Dust Control Program. Friends of Oceano Dunes' Exhibits 1 – 10 are not reproduced in this Final Program EIR, but are available for review at the Oceano Dunes District Office (340 James Way, Suite 270, Pismo Beach, CA 93449), Oceano Dunes SVRA Ranger Station (928 Pacific Boulevard, Oceano, CA 93445), and OHMVR Division Headquarters 1725 23<sup>rd</sup> Street, Sacramento, CA 95816) during normal business hours.

Comment K1: Friends of Oceano Dunes notes it has submitted its comments on the Draft Program EIR at a disadvantage because the OHMVR Division has not yet provided documentation in response to Friends' September 2, 2016 Public Records Act request for information related to operating policies, agency coordination, and land ownership within the SVRA.

*Response to Comment K1:* Comment noted.

**Comment K2:** Friends of Oceano Dunes states the Draft Program EIR provides different acreages for the proposed Dust Control Program area at different places in the document and requires clarification on the exact acreage of the proposed Program's area.

Response to Comment K2: Comment noted. Friends of Oceano Dunes does not provide specific examples or page numbers in the Draft Program EIR that can be addressed in the response. Nonetheless, as a general clarification, the proposed Program area totals 983 acres (also referred to in the Draft Program EIR as approximately 985 acres). The OHMVR Division directs Friend of Oceano Dunes to Draft Program EIR Section 2.3.1, which indicates the proposed Program area consists of: 1) a primary, 688-acre area at Oceano Dunes SVRA where vegetation plantings, seasonal dust control measure deployment, and monitoring would occur; and 2) a 295-acre area downwind of Oceano Dunes SVRA where tree plantings could occur. The Draft Program EIR is consistent in its identification of the proposed Program area. Nonetheless, the OHMVR Division has clarified Draft Program EIR Section 2.3.1 to provide the exact total acreage of the proposed Dust Control Program (see Section 3.3 of this Final Program EIR).

Comment K3: Friends of Oceano Dunes notes the Draft Program EIR indicates the proposed Dust Control Program area avoids USFWS-designated critical habitat area for western snowy plover. Friends asserts the proposed Dust Control Program area encompasses critical habitat for western snowy plover because USFWS maps indicate the critical habitat area extends inland from the mean high tide line approximately 1,372 feet. Friends of Oceano Dunes requests the OHMVR Division provide detailed maps showing the relationship between the Dust Control Program area and critical habitat for the western snowy plover.

Response to Comment K3: Friends of Oceano Dunes is correct the Draft Program EIR indicates the proposed Dust Control Program area avoids critical habitat for western snowy plover. The Draft Program EIR acknowledges the proposed Dust Control Program

area is bordered on the west by the critical habitat area (Draft Program EIR pages S-1, 2-20, 7-14), which is graphically depicted in Draft Program EIR Figure 2-5. The Draft Program also clearly identifies the proposed Program area is setback from the Pacific Ocean by approximately 1,100 feet (in the vicinity of marker posts 4 and 5) to 1,500 feet (in the vicinity of marker post 7) to avoid western snowy plover critical habitat and the seasonal nesting exclosure (Draft Program EIR pages 2-25 and 7-5).

Friends of Oceano Dunes' assertion that the proposed Dust Control Program area encompasses critical habitat for western snowy plover is incorrect. The location of the critical habitat area depicted on Draft Program EIR Figure 2-5 and new Figure 7-2 (see Chapter 3 of this Final Program EIR) consists of Geographic Information System (GIS) data provided by the USFWS via its critical habitat portal (USFWS 2012, 2016<sup>10</sup>). This data indicates the critical habitat area borders the northern extent of the proposed Dust Control Program area (between marker posts 4 and 5), but is approximately 240 feet west of the southern extent of the proposed Program area (near marker post 7).

In addition, the western snowy plover 2012 final critical habitat designation is not accurately depicted in the Friends of Oceano Dunes Exhibit 2 and does not appear to be rendered with GIS. The final designation (USFWS 2012) does not discuss the western boundary of the western snowy plover critical habitat except to say that:

"Establishing a western boundary is difficult, but the "water's edge" is a boundary that is easily determined on the ground...and will change with seasonal and daily tides, storm events, beach configuration, etc. Our maps and the inclusion of the intertidal zone are an attempt to address the water's edge issue and include the full range of habitat available to the Pacific Coast WSP."

This indicates that the western boundary of the final designated western snowy plover is not the mean high tide line as asserted by Friends of Oceano Dunes, but rather farther west encompassing more of the intertidal zone (see new Figure 7-2). The western boundary of Pismo State Beach is periodically adjusted to coincide with the mean high tide line. Draft Program EIR page 7-14, as revised by this Final EIR (see Section 3.7), states that the western boundary of the western snowy plover critical habitat is farther west than the Pismo State Beach boundary. Thus, Friends of Oceano Dunes is incorrect when they assert that the critical habitat area extends inland from the mean high tide line approximately 1,372 feet.

**Comment K4:** Friends of Oceano Dunes requests the OHMVR Division clarify whether the area where additional trees may be planted falls within the proposed Program area.

Response to Comment K4: Yes, the potential tree planting area is in included in the Dust Control Program area. The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR page 2-18, which states, "The proposed Dust Control Program area also includes an approximately 295-acre area of privately-owned lands located immediately downwind and adjacent to Oceano Dunes SVRA (see Figure 2-5). All potential tree plantings would occur within this area." See also the response to Friends of Oceano Dunes Comment K2.

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<sup>&</sup>lt;sup>10</sup> USFWS. 2016. Environmental Conservation Online System < <a href="https://ecos.fws.gov/ecp/report/table/critical-habitat.html">https://ecos.fws.gov/ecp/report/table/critical-habitat.html</a>>. Accessed December 10, 2016.

**Comment K5:** Friends of Oceano Dunes asserts the California Coastal Act does not grant the California Coastal Commission jurisdictional authority for the proposed Dust Control Program CDP and requests clarification of what is meant by the term "master" CDP.

Response to Comment K5: The OHMVR Division has coordinated with staff from CCC, as well as the City of Grover Beach and San Luis Obispo County, regarding the appropriate and most efficient jurisdictional authority for the OHMVR Division's Dust Control Program CDP. Draft Program EIR Section 5.1.2 provides a description of the California Coastal Act, including permitting authority and directs Friends of Oceano Dunes to Draft Program EIR page 5-1, which states, "For the proposed Dust Control Program, the OHMVR Division, SLO County, the City of Grover Beach, and the CCC have consented to a consolidated CDP process (pursuant to California Public Resource Code Section 30601.3) by which the CCC will process and act upon the OHMVR Division's CDP application."

The Coastal Act does not specifically define or include the term "Master CDP." Nonetheless, CCC staff recommended the OHMVR Division use this term when submitting its CDP application because the permit is intended to address the review and approval of subsequent Dust Control Program activities over a multi-year period that could otherwise require a project-specific CDP each year.

**Comment K6:** Friends of Oceano Dunes states the EIR fails to inform the public if the OHMVR Division has had discussions with private landowners regarding activities on private lands.

Response to Comment K6: Comment noted. The Draft Program EIR acknowledges that tree plantings "would only occur if the OHMVR Division could successfully negotiate with private landowners to plant trees (Draft Program EIR page 2-22)." As of the writing of this Final Program EIR (March 2017), the OHMVR Division has not initiated discussions with any private landowners. The annual review process described in Draft Program EIR Section 2.4.1, as revised by Section 3.3 of this Final Program EIR, includes a requirement for the OHMVR Division to secure authorization prior to starting dust control projects on private or state-leased lands.

**Comment K7:** Friends of Oceano Dunes states Draft Program EIR Section S.1.1.4 fails to advise the public which other agencies would review Dust Control Program activities and what standards the OHMVR Division would be required to comply with as part of the annual review process.

Response to Comment K7: Friends of Oceano Dunes references summary text from the Draft Program EIR that is not intended to be exhaustive. The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 2.4.1, which describes the proposed annual review process in detail. Since the exact location of potential Dust Control Program activities is not yet known (see Draft Program EIR Sections 1.3 and 2.3.3), the annual review process requires the OHMVR Division to develop a list of annual projects, evaluate their consistency with the Program EIR and any CDP conditions, and obtain approval from all necessary agencies. As shown in Section 3.3 of this Final Program EIR, the OHMVR Division has revised the text on Draft Program EIR page 2-32 to indicate which potential agency approvals may be required (e.g., USFWS, CDFW). In regards to standards, proposed Dust Control Program activities would be subject to the requirements incorporated into the Dust Control Program (see Draft Program EIR Table 2-5) as well as mitigation measures included in the Program EIR;

however, conditions related to the CDP or other potential future approval are not known at this time and therefore cannot be described.

**Comment K8:** Friends of Oceano Dunes states the Draft Program EIR fails to identify specifically "other established paths of travel."

Response to Comment K8: Comment noted. Friends of Oceano Dunes' remarks do not provide a specific recommendation or request for a change to the Draft Program EIR. Nonetheless, the phrase "established paths of travel" is intended to describe those routes at Oceano Dunes SVRA that are demarcated by posts, such as Sand Highway and emergency response vehicle routes, and fencing, such the maintained travel lanes that provide access from the beach to the interior of the dunes. Outside of the riding area, established paths of travel are considered to be the least damaging path to get to a project area, which would typically consist of open, unvegetated sand away from sensitive resource areas.

**Comment K9:** Friends of Oceano Dunes states the Draft Program EIR fails to identify an area, mitigation ratio, and standards or guidelines for replacing the loss of camping and OHV recreational opportunities caused by the Dust Control Program.

Response to Comment K9: As shown in Section 3.4 of this Final Program EIR, the OHMVR Division has augmented and clarified Draft Program EIR Mitigation Measure REC-1 and the discussion pertaining to this measure to address mitigation ratios, areas, and standards.

**Comment K10:** Friends of Oceano Dunes states that the Draft Program EIR does not consider the combined impact on recreational opportunities from the proposed Dust Control Program and long-term sea level rise.

Response to Comment K10: Comment noted. Friends of Oceano Dunes' remarks do not provide specific evidence that this effect would be potentially significant or a specific recommendation or request for a change to the Draft Program EIR. Nonetheless, the OHMVR Division is providing the following response for information purposes.

Friends of Oceano Dunes is correct that the Draft Program EIR does not discuss the combined recreational impact from Dust Control Program activities and potential long-term sea level rise. As shown in Section 2.3 of this Final Program EIR, the OHMVR Division has added information on predicted sea level rise at and near Oceano Dunes SVRA to the EIR. This additional information indicates the potential for sea level rise at Pismo State Beach would not result in a new or more severe impact on recreation than that identified in the Draft Program EIR.

**Comment K11:** Friends of Oceano Dunes states that the Draft Program EIR does not consider the combined impact on western snowy plover critical habitat and California least tern habitat from the proposed Dust Control Program and long-term sea level rise.

*Response to Comment K11:* Comment noted. Friends of Oceano Dunes' remarks do not provide specific evidence that this effect would be potentially significant or a specific recommendation or request for a change to the Draft Program EIR. Nonetheless, the OHMVR Division is providing the following response for information purposes.

Friends of Oceano Dunes is correct that the Draft Program EIR does not discuss the combined impact on critical habitat from Dust Control Program activities and potential long-term sea level rise. As shown in Section 2.3 of this Final Program EIR, the OHMVR

Division has added information on predicted sea level rise at and near Oceano Dunes SVRA to the EIR, including new Figure 9-1, which shows the projected flooding impacts from sea level rise in the Program area based on a 1.4 m (4.6 ft) sea level rise by 2100. If loss of beach occurs due to sea level rise as expected, the beach and dunes will migrate east and if this occurs, it is expected that western snowy plovers and California least terms could move east as well. But, as discussed in the response to Friends of Ocean Dunes' Comment K3, the western boundary of the final designated western snowy plover critical habitat encompasses much of the intertidal zone. Thus, sea level rise may not necessarily impact critical habitat for western snowy ployer. In fact, the USFWS' final critical habitat designation "expanded critical habitat to the east from past designations to help ensure there will be adequate potential for habitat in the future as sea-level rise occurs" (USFWS 2012). Finally, the OHMVR Division has incorporated Standard and Specific Project Requirements into the planning, design, and implementation of the proposed Dust Control Program that would avoid and minimize impacts on western snowy plover, thus rendering any potential cumulative impact from the Dust Control Program and sea level rise less than significant.

**Comment K12:** Friends of Oceano Dunes notes Draft Program EIR page S-5 states the current open riding and camping area is 1,453 acres, which is different than the acreage presented in other planning documents, and asserts the OHMVR Division has underestimated the percentage loss in recreation lands that would occur with the proposed Dust Control Program.

Response to Comment K12: The Draft Program EIR is based upon the most recent information available to the OHMVR Division and consistently identifies the amount of acres open to OHV use as 1,453 acres or approximately 1,450 acres (see, for example, Draft Program EIR Tables 2-1, 4-6, 4-8, and 4-9). Friends of Oceano Dunes does not provide any specific examples from the Draft Program EIR where "wildly" different acreages for current OHV recreation are reported, nor does Friends of Oceano Dunes provide any specific examples of wildly different acreages from other planning documents. There are a number of factors that could lead to perceived inconsistencies with stated acreages. For example, information could be limited to specific park units (e.g., limited to Pismo State Beach), limited to specific recreational activities (e.g., area open to street legal vehicles versus the area open to OHVs), limited by season and /or time of year when some areas of the SVRA are subject to temporary closure or, if from sources other than the Program EIR, out of date. The OHMVR Division does acknowledge that Oceano Dunes District staff were recently (the last several years) reporting the size of the SVRA's open riding and camping area as 1,490 acres; however, this is no longer the case. The size of the SVRA's open riding and camping area has been updated to reflect the recent expansion of cultural resources protection measures (16) acres, see Draft Program EIR 11-5) and a 2016 land survey of the SVRA's eastern boundary.

**Comment K13:** Friends of Oceano Dunes notes the Draft Program EIR identifies a significant conflict with the Oceano Dunes SVRA General Development Plan and Resource Management Plan. Friends of Oceano Dunes states the proposed Program may not proceed without an amendment to the SVRA's General Development Plan and Resource Management Plan.

Response to Comment K13: Comment noted. Friends of Oceano Dunes SVRA is correct that Draft Program EIR Impact LUP-1 identifies that the implementation of the proposed Dust Control Program would result in a significant and unavoidable conflict with the Oceano Dunes SVRA General Development Plan and Resource Management Plan

because the proposed Program's potential loss in OHV recreational lands is considered a significant recreational impact due to the SVRA's history, popularity, unique coastal recreational opportunities, and the lack of similar facilities in the state. Friends of Oceano Dunes Comment K13 does not provide a specific reason why the proposed Dust Control Program may not proceed without an amendment to these plans, or present any new information that changes the findings of the EIR.

**Comment K14:** Friends of Oceano Dunes notes the Draft Program EIR indicates the proposed Dust Control Program "could" significantly conflict with the California Coastal Act, and states the OHMVR Division must make a determination under CEQA whether the proposed Program conflicts with the Coastal Act or not.

Response to Comment K14: The OHMVR Division disagrees with Friends of Oceano Dunes. As explained in the responses to CCC Comments C3 and C11 (see Section 4.3 of this Final Program EIR), the OHMVR Division, acting as the CEQA Lead Agency, is required to consider the proposed Program's consistency with the Coastal Act. Accordingly, the OHMVR Division has determined the proposed Dust Control Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA (see Draft Program EIR Impact LUP-2). The OHMVR Division cannot make a determination with certainty regarding the proposed Program's consistency with the Coastal Act because the OHMVR Division's CDP application and the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC. Accordingly, the Draft EIR also notes (page 5-18), "the CCC may determine the Dust Control Program, as described in this EIR, is consistent with the Coastal Act and/or impose additional conformance on the Program as necessary to support its issuance of a CDP and the Program's conformance with the Coastal Act."

**Comment K15:** Friends of Oceano Dunes reiterates the size of the current riding area is not consistent with other planning documents and asserts that this inconsistency renders the Draft Program EIR's cumulative impact analysis flawed.

Response to Comment K15: As explained in the response to Friends of Oceano Dunes Comment K12 above, there are several reasons why different documents may report different sizes for the Oceano Dunes SVRA open riding and camping area. Comment K15 does not provide any specific examples from other planning documents that can be responded to at this time. The Draft Program EIR was prepared using the most recent information available to the OHMVR Division and consistently identifies the amount of acres open to OHV use as 1,453 acres or approximately 1,450 acres (see, for example, Draft Program EIR Table 2-1, 4-6, 4-8, and 4-9). The cumulative impact analysis is not flawed because it also incorporated the use of the most recent information available to the OHMVR Division.

**Comment K16:** Friends of Oceano Dunes reiterates the project may not proceed without formal amendments to the Oceano Dunes SVRA General Development Plan and Resource Management Plan, and notes that it does not appear these plans can be amended in a way that is consistent with the SVRA Act.

*Response to Comment K16:* Comment noted. Refer to the response to Comment K13 for an explanation of why an amendment to the General Development Plan is not necessary at this time.

**Comment K17:** Friends of Oceano Dunes states the OHMVR Division did not consider a reasonable range of alternatives and submits information on an alternative consisting of 50-foothigh fences that could be implemented in-lieu of and /or in combination with seasonal dust control measures.

Response to CCC Comment K17: As explained in the response to CCC Comments C6, C7, and C8 (see Section 4.3 of this Final Program EIR), Draft Program EIR Chapter 12 includes a robust evaluation of alternatives to the proposed Program, including: a different dust control program location (Draft Program EIR Section 12.2.1); an accelerated Dust Control Program schedule (Draft Program EIR Section 12.2.2); OHV use restrictions (Draft Program EIR Sections 12.2.3.1 and 12.2.3.2); off-site residential filtration systems (Draft Program EIR Sections 12.2.4.1 and 12.2.4.2); two versions of the No Project Alternative (Draft Program EIR Sections 12.3.1 and 12.3.2); and, an alternate dust control program recommended by the SLOAPCD. As a point of clarification, the PMRP the OHMVR Division prepared to comply with SLOAPCD Rule 1001 (see Draft Program EIR Section 1.1.4) eliminated the use of wind breaks from further consideration as a dust control measure. As shown in Section 3.8 of this Final Program EIR, the OHMVR Division has revised the Draft Program EIR's discussion of alternatives to include an evaluation of artificial windbreaks both in-lieu of or in combination with seasonal dust control measures. This evaluation concludes the use of artificial wind breaks is not feasible for technical reasons involving pole foundations and material breakdown. In addition, while this alternative could reduce (but not substantially lessen) the proposed Program's significant recreation impacts, it would result in new, significant and unavoidable aesthetic and biological resources impacts.

**Comment K18:** Friends of Oceano Dunes states it strongly objects to the SLOAPCD-recommended alternate dust control program evaluated in the Draft Program EIR and notes the Draft Program EIR erroneously presumes that this alternative is feasible. Friends of Oceano Dunes also states this alternative would not be the most protective of significant coastal resources.

Response to Comment K18: Comment noted. The OHMVR Division directs Friends of Oceano Dunes to the discussion on pages 12-10 and 12-11 of the Draft Program EIR, which briefly explains the OHMVR Division's rational for discussing this alternative (not potentially limiting the OHMVR Division's ability to comply with Rule 1001) and the economic and logistical uncertainty regarding the feasibility of the alternative. The Draft EIR does presume the alternate dust control program is feasible for analysis and discussion purposes; however, after considering this alternative in appropriate detail, the Draft Program EIR concludes this alternative would not avoid or substantially lessen the proposed Program's significant recreation and land use impacts, and could result in new, significant and unavoidable aesthetic and biological resources impacts. Accordingly, the Draft Program EIR does not identify this alternative as the environmentally superior alternative. The OHMVR Division also notes that the Coastal Commission has jurisdiction with regards to PRC Section 30007.5. Refer also to the response to Comments C2 and C11 for additional information on this issue (see Section 4.3 of this Final Program EIR).

**Comment K19:** Friends of Oceano Dunes suggests the Draft Program EIR consider an alternative that consists of only temporary dust control measures (i.e., no vegetation expansion).

Response to Comment K19: The Draft Program EIR considers an alternative involving only the use of temporary dust control measures. The OHMVR Division directs Friends of Oceano Dunes to the discussion of the No Comprehensive Dust Program Alternative in Draft Program EIR Section 12.3.2. As described in the Draft Program EIR (page 12-9), this alternative consists of "an interim series of dust control projects, which, for the purposes of this alternatives analysis, would consist of approximately 40 acres of seasonal dust control measures such as wind fencing, straw bales, or PREs." The Draft Program EIR concludes the No Comprehensive Dust Program Alternative would substantially reduce and/or avoid most of the proposed Program's significant impacts but obtain only some of the basic objectives set for the Program to a degree. Comment K19 does not provide any specific suggestion or recommendation that warrants the evaluation of an additional alternative in the EIR at this time.

**Comment K20:** Friends of Oceano Dunes states the EIR erroneously concludes that the No Action Alternative and the No Comprehensive Dust Program Alternative are the least environmentally damaging alternatives and suggests the alternative described in Friends of Oceano Dunes Comment K19 is the environmentally superior alternative.

Response to Comment K20: The Draft Program EIR accurately concludes the No Action Alternative and the No Comprehensive Dust Program Alternative are the least environmentally damaging alternatives. The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 12.3.1, which explains the No Action Alternative would result in minimal changes to the environment, thereby avoiding the proposed Program's significant recreation, land use, and noise impacts. Similarly, the OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 12.3.2, which explains the No Comprehensive Dust Program Alternative would not result in the planting of 100 acres of vegetation, nor track-out prevention devices. Thus, this alternative would substantially reduce or avoid the proposed Program's significant recreation, land use, and noise impacts. The OHMVR Division also notes Draft Program EIR Table 12-2 compares the proposed Program's impacts against the impacts of the alternatives evaluated in detail in the Draft Program EIR. Finally, as a point of clarification, CEQA Guidelines section 15126.6(e)(2) specifies that if the environmental analysis indicates the no project alternative is environmentally superior, the EIR shall also identify an environmentally superior alternative among the other alternatives considered in the EIR. Accordingly, the Draft Program EIR identifies the proposed Program as the environmentally superior alternative because it obtains all of the objectives the OHMVR Division has set for the proposed program and results in lower magnitude impacts than the other alternatives considered in detail in the Draft Program EIR.

**Comment K21:** Friends of Oceano Dunes states Draft Program EIR Section S.1.4 does not indicate if the proposed annual review process would include measures to ensure public notice and participation in the process. In addition, Friends of Oceano Dunes notes that since the review process may result in changes to the proposed Program, the public should be given an opportunity to participate in the review.

Response to Comment K21: The proposed annual review process referenced in Comment K21 is described in detail in Draft Program EIR Section 2.4.1. This process is the mechanism by which the CCC and other potential agencies would evaluate the proposed Dust Control Program' compliance with applicable CDP conditions (if the CCC issues a CDP for the proposed Program). This review process did not include public notice and

participation measures because the proposed Dust Control Program is subject to public review, comment, and revision as part of the OHMVR Division's CEQA review process. Similarly, the CCC's review and issuance of a CDP is subject to a public review process. Thus, the public has now and will continue to have an opportunity to participate in the review of the proposed Program.

The annual review process also provides an opportunity for the OHMVR Division to review subsequent dust control activities and determine if they are within the scope of the Program EIR that is this subject of this public CEOA review process. Draft Program EIR Section 1.3 explains the OHMVR Division is required (pursuant to CEQA) to consider subsequent dust control activities against the scope and content of the Program EIR. Specifically, page 1-11 states, "In accordance with CEQA Guidelines Section 15168(c), if dust control activities implemented later under this Program EIR are within the scope of this Program EIR, no further CEQA review is necessary. If the OHMVR Division determines the later activity would have effects that were not examined in this Program EIR, it would evaluate potential impacts under PRC Section 21166, which only requires subsequent CEOA review in certain circumstances. Any feasible mitigation measures or alternatives developed in this Program EIR must also be included in the subsequent activity." Thus, should the proposed Program change in a manner such that it would result in effects that were not examined in the Program EIR, the OHMVR Division would need to prepare a new Initial Study or EIR, which may include public noticing and participation requirements.

Nonetheless, as shown in Section 3.3 of this Final Program EIR, the OHMVR Division has revised the annual review process to make the final documents pertaining to the annual review process available for public review.

**Comment K22:** Friends of Oceano Dunes states that previous dust control activities dating back to 2010 are part of the same series of actions pertaining to the proposed Dust Control Program, are not exempt from CEQA, and should be analyzed in the EIR.

Response to Comment K22: The Draft Program EIR describes the physical environmental conditions at and in the vicinity of the Dust Control Program area as they existed in February 2015, which was when the OHMVR Division issued the Revised NOP for the EIR (see response to SLOAPCD Comment D13 in Section 4.4 of this Final Program EIR). Draft Program EIR Section 2.2.7.4 describes ongoing and completed dust control activities implemented at Oceano Dunes SVRA and Pismo State Beach, noting (page 2-13), "some of these ongoing and completed activities are part of the baseline environmental conditions and some are not." As explained in Draft Program EIR Section 2.2.7.4, as revised by Section 3.3 of this Final Program EIR, the ongoing and recently completed dust control activities that are not part of baseline conditions include the 2015 and 2016 wind fencing arrays, the 2016 PRE array, and the 2015 and 2016 dust and meteorological monitoring projects. (See CEQA Guidelines Section 15125(a) [the baseline physical conditions are those "as they exist at the time the notice of preparation is published"]; North Coast Rivers Alliance v. Westlands Water Dist. (2014) 227 Cal.App.4th 832, 872.)

In general, ongoing and recently completed dust control projects described in the Draft Program EIR are related to, but independent from, the proposed Dust Control Program. These past projects were intended to inform development of a potential comprehensive dust control program at Oceano Dunes SVRA. Specifically, Draft Program EIR pages 2-

15 to 2-16 state, "Since 2011, the OHMVR Division has undertaken an iterative series of dust control projects at Oceano Dunes SVRA. The purpose of these projects was threefold: 1) To test how effective different dust control measures are at controlling and minimizing dust emissions; 2) To test the ability of different dust control measures and monitoring equipment to withstand harsh dune conditions (e.g., salt, sand blasting); and 3) To test the ability of different dust control measures to be feasibly installed at Oceano Dunes SVRA, given dune topography, equipment and staffing resources, and other factors." Each ongoing and recently completed dust control project described in Draft Program EIR Section 2.2.7.4 was subject to an independent CEQA review that concluded the projects were exempt from CEQA, was noticed as necessary pursuant to CEQA, and for which the statute of limitations period set forth under CEQA Guidelines Section 15112 has expired in most cases 11. Furthermore, nearly all of these projects are complete (with the dust control measures and monitoring equipment removed) and thus do not have the potential to result in impacts that could combine with the proposed Dust Control Program activities. The exception to this is 2014 straw bale array (which remains partially in place) and ongoing meteorological monitoring projects, both of which are properly evaluated in Draft Program EIR Chapter 11, Cumulative Impacts.

Thus, for the reasons described above, the Draft Program EIR adequately evaluates ongoing and recently completed dust control projects under CEQA. These projects are related to, but independent of, the Dust Control Program, exempt from CEQA, and are properly evaluated for their potential to result in impacts that could combine with the proposed Dust Control Program activities.

**Comment K23:** Friends of Oceano Dunes states the Draft EIR should identify SLO County as a responsible agency because the County owns the La Grande Tract within Oceano Dune SVRA where dust control activities could occur. Friends of Oceano Dunes also states the OHMVR Division needs to determine which agencies are CEQA responsible agencies.

Response to Comment K23: Draft Program EIR section 1.4.1 explains that the state CEQA Guidelines define a responsible agency as a public agency which proposes to carry out or approve a project for which a Lead Agency has prepared an EIR. SLO County is not proposing to carry out any portion of the OHMVR Division's Dust Control Program. In addition, the OHMVR Division operates the part of the SVRA within the County's La Grande Tract under an existing operating agreement. This operating agreement provides the OHMVR Division with the authority to implement the proposed Dust Control Program. Thus, SLO County is not a responsible agency under CEQA for the proposed Dust Control Program EIR.

In general, CEQA and the state CEQA Guidelines require a lead agency to consult with and notify all responsible and trustee agencies, which the OHMVR Division has done (see Draft Program EIR Section 1.5 and Section 1.1 of this Final Program EIR). Neither CEQA nor the state CEQA Guidelines explicitly require an EIR to conclusively determine whether a public agency will act as responsible agency. The OHMVR Division has, therefore, distributed the NOP and Draft EIR to *potential* responsible agencies. These agencies may subsequently rely upon the OHMVR Division's EIR should the

The OHMVR Division's CEQA review of its Spring 2016 Dust Control Project is the subject of ongoing litigation regarding whether those activities are in fact exempt from CEQA (Friends of Oceano Dunes, Inc. v. California Department of Parks and Recreation, San Luis Obispo Superior Court Case No. 16-CV-0113).

proposed Program require approval from one or more of these potential responsible agencies in the future.

**Comment K24:** Friends of Oceano Dunes states the Draft Program EIR fails to define the term "Master CDP" and describe the provisions of the Coastal Act that authorize such a permit. Friends of Oceano Dunes also states the Draft Program EIR fails to describe the provisions of the Coastal Act that grant the CCC original permit jurisdiction for the proposed Dust Control Program.

*Response to Comment K24:* Comment noted. Matters pertaining to the CCC's administrative authority and procedures for processing a CDP application are outside the scope of the OHMVR Division's CEQA review of the proposed Dust Control Program. Nonetheless, for information purposes, the OHMVR Division notes:

- CCC staff recommended the OHMVR Division use the term "Master CPD" because the CDP is intended to address the programmatic review and approval of subsequent Dust Control Program activities over a multi-year period that could otherwise require a project-specific CDP each year.
- Draft Program EIR Section 5.1.2 provides a description of the California Coastal Act, including provisions pertaining to CDP permitting authority, and specifically states (page 5-1), "For the proposed Dust Control Program, the OHMVR Division, SLO County, the City of Grover Beach, and the CCC have consented to a consolidated CDP process (pursuant to California Public Resource Code Section 30601.3) by which the CCC will process and act upon the OHMVR Division's CDP application."

Refer to response to Comment K5 for additional information regarding this topic.

**Comment K25:** Friends of Oceano Dunes states Draft Program EIR section 2.1 does not define the terms "maximum extent feasible" and "consistent with public safety and environmental protection needs."

Response to Comment K25: Comment noted. The term "maximum extent feasible" is used within the context of CEQA and the state CEQA guidelines, which define "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (PRC Section 15364)." "Consistent with public safety and environmental protection needs" is a plain language phrase meant to qualify the text immediately preceding this clause. Thus, as a point of clarification, in the context of Draft Program EIR Section 2.1, the OHMVR Division would maintain existing public access routes to the extent the continued use of these routes is consistent with public safety considerations (e.g., visitor health and safety) and environmental protection needs (e.g., natural resources management considerations, dust control considerations).

**Comment K26:** Friends of Oceano Dunes states that Draft Program EIR Figure 2-1 fails to clearly delineate the County's boundaries.

Response to comment K26: Comment noted. As shown in Chapter 2 of this Final Program EIR, the OHMVR Division has revised Draft Program EIR Figure 2-1 to more clearly show the SLO and Santa Barbara County line.

**Comment K27:** Friends of Oceano Dunes summarizes information from Draft Program EIR Section 2.2.2 on dune advancement and states planting 100 acres of vegetation would impede,

impact, and interfere with the natural dune formation process. Friends of Oceano Dunes also states the Draft Program EIR fails to note such interference is inconsistent with the Coastal Act (PRC Section 30214).

Response to Comment K27: Comment noted. Friends of Oceano Dunes' summary of Draft Program EIR Section 2.2.2 is partially accurate. Draft Program EIR Section 2.2.2 does not state "the slowing of [dune] advancement is a naturally occurring process" as Friends of Oceano Dunes indicates. Rather, the Draft Program EIR states (page 2-4), "The slow movement of sand dunes over time is a naturally occurring process, but can disturb resources and infrastructure in and near the beach and dunes." Thus, the Draft Program EIR does not conclude that a reduction in the rate of dune advancement is a naturally occurring process. As described in Draft Program EIR Section 3.4.3, the proposed Dust Control Program would not significantly impede, impact, or interfere with natural dune formation processes. Accordingly, Draft Program EIR Table 5-1 identifies the proposed Program would not conflict with the Coastal Act provisions contained in PRC Section 30214.

**Comment K28:** Friends of Oceano Dunes states the Draft Program EIR fails to identify the specific policy regarding "no net loss of vegetation" at Oceano Dunes SVRA. Friends of Oceano Dunes states such a policy appears to be an underground regulation that is inconsistent with the SVRA's General Development Plan and other regulations.

Response to Comment K28: Draft Program EIR page 2-5 incorrectly references a "no net loss of vegetation" policy at Oceano Dunes SVRA. As shown in Section 3.3 of this Final Program EIR, the OHVMR Division has deleted this text from the EIR.

**Comment K29:** Friends of Oceano Dunes notes Draft Program EIR Table 2-1 indicates OHV Recreation is allowed on approximately 1,450 acres and states this figure is inconsistent with the recreational acreage listed elsewhere in the EIR.

Response to Comment K29: Friends of Oceano Dunes is correct that Draft Program EIR Table 2-1, Table Note (D), states that OHV recreation is allowed on approximately 1,450 acres of land at Pismo State Beach and Oceano Dunes SVRA. Friends of Oceano Dunes does not provide a specific inconsistency in the EIR that can be addressed by the OHMVR Division at this time. Nonetheless, as explained in more detail in response to Comment K12, the Draft Program EIR is based upon the most recent information available to the OHMVR Division and consistently identifies the amount of acres open to OHV use as 1,453 acres or approximately 1,450 acres (see, for example, Draft Program EIR Table 2-1, 4-6, 4-8, and 4-9).

**Comment K30:** Friends of Oceano Dunes requests the OHMVR Division amend Draft Program EIR Figure 2-2 to show the proximity of the proposed Dust Control Program area to western snowy plover critical habitat. Friends of Oceano Dunes also requests an explanation regarding why the potential tree planting area is not considered part of the Program area and states the Draft Program EIR should evaluate impacts from potential tree plantings.

Response to Comment K30: Comment noted. As explained in more detail in response to Comment K3, the location of the western snowy plover critical habitat area is depicted on Draft Program EIR Figure 2-5 and new Figure 7-2 (see Chapter 3 of this Final Program EIR) and therefore there is no need to revise Draft Program EIR Figure 2-2. In addition, as explained in more detail in response to Comment K2, the proposed Program area consists of: 1) a primary, 688-acre area at Oceano Dunes SVRA where vegetation

plantings, seasonal dust control measure deployment, and monitoring would occur; and 2) a 295-acre area downwind of Oceano Dunes SVRA where tree plantings could occur. Thus, the potential tree planting area is considered part of the overall Program area (see Draft Program EIR Figure 2-2 through 2-5, 2-8, and 2-9). Accordingly, the Draft Program EIR does evaluate the potential impacts of this activity where necessary and appropriate (see Draft Program EIR Sections 3.4.1, 4.3.2, Draft Program EIR Table 5-1, and Draft Program EIR Impacts AES-1, BIO-1, BIO-2, and BIO-3).

**Comment K31:** Friends of Oceano Dunes notes that the Draft Program EIR identifies that visitation to the SVRA is highest from late May through early September, when seasonal dust control measures would be in place, and states the Draft Program EIR does not accurately or adequately discuss the "constant" impact of dust control measures on OHV recreation access.

Response to Comment K31: Comment noted. It is not clear what Friends of Oceano Dunes refers to in regards to the "constant" impact of dust control measures on OHV recreation access. But, the OHMVR Division does note Draft Program EIR Sections 2.2.5, 4.2, and 4.2.3.4 contain detailed visitor information, and Draft Program EIR 4.3.2 does describe the amount of land that could be temporarily and permanently occupied by the proposed dust control measures. Furthermore, Draft Program EIR Impact REC-1 and CML-1 factor the park's popularity into consideration, as well as the fact that seasonal dust control measures would be in place during periods of high visitation such as holidays and summer break for the traditional school year. The Draft Program EIR concludes the proposed Program's impacts on coastal vehicular recreation opportunities would be significant and unavoidable impacts of the proposed Program. Friends of Oceano Dunes does not provide any clear, specific evidence or reason why the Draft Program EIR's evaluation of potential impacts to OHV recreation is inaccurate and/or inadequate.

**Comment K32:** Friends of Oceano Dunes requests the OHMVR Division revise Draft Program EIR Figure 2-3 to show the precise location of western snowy plover critical habitat in relation to the proposed Program area, as well as areas of known least tern habitat.

Response to comment K32: Comment noted. As explained in more detail in response to Comment K3, the location of the western snowy plover critical habitat area is depicted on Draft Program EIR Figure 2-5 and new Figure 7-2 (see Chapter 3 of this Final Program EIR) and, therefore, there is no need to revise Draft Program EIR Figure 2-3. In addition, as explained in Draft Program EIR Section 7.2.2.2 and Section 2.1 of this Final Program EIR, the Program area contains suitable breeding, foraging, and roosting habitat for California least tern, which is known to nest in habitat that is also suitable for western snowy plover, including western snowy plover critical habitat areas.

**Comment K33:** Friends of Oceano Dunes notes Draft Program EIR Section 2.2.7 indicates some previous dust control activities are considered part of the baseline environmental conditions and states these previous activities were illegally exempt from CEQA.

Response to comment K33: As explained in more detail in response to Comment K22, each ongoing and recently completed dust control project described in Draft Program EIR Section 2.2.7.4 was subject to an independent CEQA review that concluded the projects were exempt from CEQA, was noticed as necessary pursuant to CEQA, and for which the statute of limitations period set forth under CEQA Guidelines Section 15112 has expired in most cases.

**Comment K34:** Friends of Oceano Dunes states the Draft Program EIR erroneously concludes the seasonal installation of 1,700 feet of wind fencing is an ongoing activity that is part of the environmental baseline conditions because this activity is installed anew each year and thus cannot legally be considered part of the baseline.

Response to comment K34: As explained in more detail to response to Comment K22 above and SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the Draft Program EIR describes the physical environmental conditions at and in the vicinity of the Dust Control Program area as they existed in February 2015, which was when the OHMVR Division issued the Revised NOP for the EIR. These conditions constitute the baseline conditions against which the effects of the proposed Dust Control Program are evaluated. Draft Program EIR Section 2.2.7.1 describes the installation of fencing upwind of Grand Avenue, Pier Avenue, and Strand Way as a recurring activity that occurs from March to July of each year. Thus, the Draft Program EIR appropriately concludes this activity is part of the baseline environmental conditions at Oceano Dunes SVRA. In addition, as a point of clarification, the OHMVR Division notes this activity is included in the OHMVR Division's CDP application and is therefore part of the proposed Dust Control Program; however, since the proposed Program would merely continue a baseline activity, there is no new change to the physical environment that requires detailed analysis in the EIR.

**Comment K35:** Friends of Oceano Dunes states the OHMVR Division should revise Draft Program EIR Figure 2-4 to a scale that allows the public to more clearly see the location of the ongoing and recently completed dust control activities. Friends of Oceano Dunes also requests the OHMVR Division add western snowy plover critical habitat, California least tern habitat, and jurisdictional wetland habitat to Draft Program EIR Figure 2-4.

Response to comment K35: The OHMVR Division directs Friends of Oceano Dunes to Chapter 3 of this Final Program EIR, which contains a revised version of Figure 2-4 presented at a larger scale, and inclusive of western snowy plover critical habitat, California least tern habitat, and wetland habitat. Draft Program EIR Section 7.2.1.3 discusses wetlands in and near the proposed Program Area, and native wetland alliance vegetation communities are depicted on Draft Program EIR Figure 7-1. A wetland delineation has not been performed within the Dust Control Program area so jurisdictional wetland habitat cannot be shown; however, vegetation that is known to be facultative wetland vegetation (Lichvar et al. 2016) is shown on revised Figure 2-4 (specifically, arroyo willow and the native wetland alliance are shown). These areas have the potential to be considered wetland habitat according to the CCC. Facultative wetland vegetation usually occurs in wetlands, but may occur in non-wetlands as well.

Comment K36: Friends of Oceano Dunes states the Draft Program EIR incorrectly concludes that dust control measures implemented since 2010 are part of the baseline conditions and have therefore been incorrectly excluded from the EIR's analysis. Friends of Oceano identifies that Draft Program EIR page 2-16 states the OHMVR Division planned removal of straw bales is an activity that would occur after the NOP for the EIR was issued and as such should be considered in the Draft Program EIR's cumulative impact analysis.

Response to Comment K36: As explained in more detail to response to Comment K22 above and SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), ongoing and recently completed dust control projects described Draft Program EIR Section 2.2.7 are related to, but independent from, the proposed Dust Control Program.

These past projects were intended to inform development of a potential comprehensive dust control program at Oceano Dunes SVRA, and the Draft Program EIR appropriately and clearly identifies which activities are and are not part of the baseline environmental conditions at Oceano Dunes SVRA. As points of clarification, the OHMVR Division notes:

- Friends of Oceano Dunes SVRA is correct that the Draft Program EIR page 2-16identifies that the OHMVR Division, at the request of the CCC, planned to remove straw bales installed in 2014. As shown in Section 3.3 of this Final Program EIR, the OHMVR Division has revised this text to indicate that few, if any straw bales would be removed due to logistical concerns. In addition, the OHMVR Division also notes that, as of March 2017, approximately 25 acres of the 30-acre straw bale array installed in 2014 have been part of vegetation restoration projects undertaken by the OHMVR Division (see Draft Program EIR Section 2.2.6.1). The potential removal of any remaining straw bales could occur at the same time as the proposed Dust Control Program activities; however, each project would be subject to requirements for avoiding and minimizing potential impacts to sensitive resources, rendering any cumulative effect less than significant.
- The 2014, 2015, and 2016 temporary wind fencing arrays described on Draft Program EIR page 2-16 are no longer in place. Thus, any potential impact from these arrays has ceased and cannot combine with future Dust Control Program activities. Accordingly, the Draft Program EIR correctly concludes on page 2-16 that these activities "have no potential to result in activities that could combine with the proposed Dust Control Program activities." Friends of Oceano Dunes does not provide any specific evidence or reason to suggest why potential impacts from previous wind fence arrays and future Dust Control Program activities have the potential to combine and result in significant cumulative impacts that the OHMVR Division can respond to at this point.

**Comment K37:** Friends of Oceano Dunes states the Draft Program EIR considers the use of soil stabilizers to be part of the environmental baseline and notes the use of soil stabilizers should be analyzed by the Draft Program EIR.

Response to comment K37: Friends of Oceano Dunes is mistaken. The OHMVR Division has not used soil stabilizers at Oceano Dunes SVRA for dust control purposes, and their use is therefore not part of the baseline environmental conditions described in the Draft Program EIR. Specifically, Draft Program EIR states (page 2-16, emphasis added), "In Spring 2015, the SLOAPCD and the OHMVR Division proposed the use of soil stabilizers on an approximately two-acre area east of the northern end of Sand Highway (see Figure 2-4); however, this proposal was rejected by the CCC." Draft Program EIR page 2-23 provides a description regarding the potential use of soil stabilizers as part of the proposed Dust Control Program, Accordingly, the Draft Program EIR does evaluate the potential impacts of this activity where necessary and appropriate (see Draft Program EIR Sections 6.3.3 and 9.3.2, Draft Program EIR Tables 2-5 and 12-1, and Draft Program EIR Impacts BIO-2 and HYD-1). In addition, Draft Program EIR Table 2-5 and Section 9.3.2 describes the requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts from the use of soil stabilizers. These requirements include, but are not limited to, the selection and use of a non-toxic, environmentally friendly stabilizer in consultation with the CCC and in consideration of

factors such as surface runoff, breakdown of products, ingestion of product by animals and humans, and downwind drift of any potential stabilizer product.

**Comment K38:** Friends of Oceano Dunes states the Draft Program EIR fails to consider the cumulative impacts of previous dust control activities.

Response to comment K38: As explained in more detail to response to Comment K22 and K36 above and SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the ongoing and recently completed dust control projects described Draft Program EIR Section 2.2.7 are related to, but independent from, the proposed Dust Control Program. These past projects were intended to inform development of a potential comprehensive dust control program at Oceano Dunes SVRA, and the Draft Program EIR appropriately and clearly identifies which activities are and are not part of the baseline environmental conditions at Oceano Dunes SVRA. Activities such as the 2013 monitoring sites and 2014 to 2014 temporary wind fencing arrays are completed and no longer in place. Thus, any potential impact from these arrays has ceased and cannot combine with future Dust Control Program activities. Friends of Oceano Dunes does not provide any specific evidence or reason to suggest why potential impacts from previous wind fence arrays and future Dust Control Program activities have the potential to combine and result in significant cumulative impacts that the OHMVR Division can respond to at this point.

Comment K39: Friends of Oceano Dunes notes SLO County has been in a severe drought for the last five years, requests information on annual rainfall for the last 10 years, and states the Draft Program EIR "ignores" drought conditions and the "likely need" for substantial water transport or irrigation to support vegetation plantings. In addition, Friends of Oceano Dunes submits an analysis as evidentiary support for its estimate of the proposed Program's potential water transport and/or irrigation needs, and states that the OHMVR Division must show that future water supplies are reasonably likely to be available for the proposed Program.

Response to comment K39: First, the Draft Program EIR does not "ignore" the drought and already contains similar rainfall information as that requested by Comment K39. The Draft Program clearly identifies that proposed vegetation projects "could be hampered by environmental factors such as a short growing season, drought, hardiness of individual plants, etc. (Draft Program EIR page 2-21)", and that the lack of available on-site water is one reason why an accelerated schedule is not a feasible Program alternative (see Draft Program EIR Section 12.2.2). In addition, Draft Program EIR Section 9.2.1 presents information on annual rainfall amounts for 2004 to 2015, stating (page 9-5), "Average annual precipitation varied from 19.3 to 28.2 inches and average temperature varies from 57.7 and 58.6 degrees Fahrenheit from 2004 to 2010. More recent precipitation data from 2011-2015 reflects the recent drought suffered by all of California. Annual precipitation from 2011 to 2015 was approximately 15.7 inches, 8.5 inches, 6.0 inches, 14.1 inches, and 8.3 inches, respectively (CIMIS 2016)."

Second, as a point of clarification, water transport and/or irrigation of newly planted dune vegetation is <u>not</u> part of the OHMVR Division's ongoing restoration program described in Draft Program EIR Section 2.2.6.1 or the proposed Dust Control Program. In addition, the OHMVR Division would plant Dust Control Program vegetation during the rainy season and would not use irrigation or other supplemental water supplies to support vegetation planted under the proposed Program. The OHMVR Division grows existing seedlings and container plants in an existing nursery that would also be used to grow seedlings and container plants for the proposed Program. The nursery is served by an

existing hose and irrigation system intended to establish seedlings and maintain container stock, and water use would remain substantially the same with or without the proposed Program because the OHMVR Division is not proposing to expand or modify the nursery at this time. Water use fluctuates according to planting volume and annual rainfall volumes, but, as explained on Draft Program EIR page 3-11 the proposed Dust Control Program would not require new or expanded water use entitlements.

**Comment K40:** Friends of Oceano Dunes notes USFWS-designated critical habitat for western snowy plover seems to overlap with the proposed Program area and requests the OHMVR Division provide a revised map at a scale that more clearly shows the location of critical habitat in relationship to the proposed Program area. Friends of Oceano Dunes also requests the OHMVR Division confirm the critical habitat depicted on Draft Program EIR Figure 2-2 is to scale and based on official USFWS maps.

Response to comment K40: As discussed in more detail in response to Comment K3 above, the OHMVR Division directs Friends of Oceano Dunes to Chapter 3 of this Final Program EIR, which contains new Figure 7-2 that graphically depicts the proposed Program area and western snowy plover critical habitat at a larger scale. The OHMVR Division confirms the location of the critical habitat area depicted on new Figure 7-2 consists of Geographic Information System (GIS) data provided by the USFWS (USFWS 2012, 2016). This data indicates the critical habitat area borders the northern extent of the proposed Dust Control Program area (between marker posts 4 and 5), but is approximately 240 feet west of the southern extent of the proposed Program area (near marker post 7). As shown on new Figure 7-2, the proposed Dust Control Program area borders, but does not overlap with or otherwise include, western snowy plover critical habitat.

**Comment K41:** Friends of Oceano Dunes states the USFWS critical habitat maps indicate there is some overlap between western snowy plover critical habitat and the proposed Dust Control Program Area.

Response to comment K41: Friends of Oceano Dunes is incorrect. The OHMVR Division directs Friends of Oceano Dunes to Chapter 3 of this Final Program EIR, which contains new Figure 7-2 that graphically depicts the proposed Program area and western snowy plover critical habitat at a larger scale. As explained in more detail in response to Comments K3, K30, K32, K35, and K40 above, USFWS-designated western snowy plover critical habitat borders the northern extent of the proposed Dust Control Program area (between marker posts 4 and 5), but is approximately 240 feet west of the southern extent of the proposed Program area (near marker post 7). As shown on new Figure 7-2, the proposed Dust Control Program area borders, but does not overlap with or otherwise include, western snowy plover critical habitat.

**Comment K42:** Friends of Oceano Dunes requests the OHMVR Division explain why the potential tree planting area is not included in the description of the proposed Program area included in Draft Program EIR Section 2.3.1.3.

Response to comment K42: Friends of Oceano Dunes is incorrect that the potential tree planting area is not included in the Draft Program EIR's description of the proposed Dust Control Program area. As discussed in more detail in response to Comment K4, the potential tree planting area is in included in the Dust Control Program area and Draft Program EIR Section 2.3.1.3 specifically states (emphasis added), "The proposed Program's potential tree planting area includes privately-owned lands downwind of

Oceano Dunes SVRA. This area is south of the community of Oceano and west of the Nipomo Mesa and is approximately 295 acres in size. The area consists of private agricultural, open space, and recreational lands and includes older sand dune and dune lake ecosystems. The area is accessible via SR 1 and private access roads. The OHMVR Division would not plant trees on 295 acres of land; rather the identified area reflects the location where trees could be planted. The exact amount of trees that could be planted (if any) is unknown at this time."

Comment K43: Friends of Oceano Dunes states the Draft Program EIR identifies that vegetation reduces sand movement but fails to consider whether this reduction in sand movement adversely affects natural dune processes and is inconsistent with the Coastal Act. In addition, Friends of Oceano Dunes states the Draft Program EIR "does not know whether 'seedling' projects would be effective." Finally, Friends of Oceano Dunes states the EIR does not adequately evaluate planting vegetation both adjacent to existing vegetation and in areas where no vegetation exists, and fails to evaluate potential adverse impacts from using herbicide to remove non-native or exotic plants.

Response to comment K43: In regards to Comment K43, the OHMVR Division notes:

- Friends of Oceano Dunes is incorrect when it states the Draft Program EIR fails to consider potential impacts on dune geology. As explained in more detail in response to Comment K27, Draft Program EIR Section 3.4.3 identifies why the proposed Dust Control Program would not significantly impede, impact, or interfere with natural dune formation processes and Draft Program EIR Table 5-1 identifies why the proposed Program would not conflict with the Coastal Act provisions contained in PRC Section 30214.
- Friends of Oceano Dunes misquotes the Draft Program EIR's discussion of vegetation seedling projects. The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR page 2-21, which states (emphasis added), "A 2011 pilot project study conducted at Oceano Dunes SVRA concluded vegetation reduced sand transport by as much as 90% to 95% within the first 165 feet (50 meters) from the upwind boundary of the vegetated area, and 90% to 99% farther downwind (DRI 2011). The effectiveness of seedling vegetation projects is uncertain, but presumably lower than mature, established vegetation." This sentence does not mean that seedling vegetation is ineffective; it means the use of seedling vegetation is likely, at first, to be less effective at reducing sand movement when compared with mature, well-established vegetation. This is one reason why the OHMVR Division is proposing to "monitor vegetation growth to ensure vegetation projects become established and meet their design control efficiency (Draft Program EIR page 2-21). It is also a reason why the OHMVR Division is proposing the use of seasonal dust control projects, which as noted on Draft Program EIR page 2-22, "can be designed to provide a specific control efficiency, can be deployed over a large area rapidly and, once installed, begin to provide immediate sand transport and dust control ...". Refer also to response to Comment K39 above for additional information regarding the factors that could limit the successful establishment of Dust Control Program vegetation projects.
- Friends of Oceano Dunes states the Draft Program EIR does not adequately evaluate planting vegetation both adjacent to existing vegetation and in areas where no vegetation exists. Friends of Oceano Dunes does not provide any

specific evidence for why the Draft Program EIR does not adequately evaluate vegetation planting options that can be responded to by the OHMVR Division. Nonetheless, for information purposes, the OHMVR Division notes Draft Program EIR Section 2.3.2.1 clearly identifies both planting options, and the Draft Program EIR adequately evaluates these planting options where appropriate and necessary (see, for example, Draft Program EIR Sections 3.4.3 and 6.3.1 and Draft Program EIR Impacts AES-1, BIO-1, and BIO-4).

• Friends of Oceano Dunes is correct the Draft Program EIR did not analyze the potential use of herbicide when removing non-native and exotic plans from newly planted Dust Control Program vegetation. As shown in Section 3.7 of this Final Program EIR, the OHMVR Division has revised the discussion under Draft Program EIR Impact BIO-1 to include an evaluation of this activity. This revision does not change the significance findings contained in the Draft Program EIR or otherwise constitute significant new information that would require recirculation of the Draft Program EIR.

**Comment K44:** Friends of Oceano Dunes states the Draft Program EIR's inclusion of soil stabilizers as part of the proposed Program seems inconsistent with the CCC's previous determination that the use of soil stabilizers was inappropriate for use in a sensitive coastal environment,

Response to comment K44: Comment noted. As explained in more detail in response to Comment K37 above, the use of soil stabilizers is described in Draft Program EIR Section 2.3.2.4 and evaluated under Draft Program EIR Impacts BIO-2 and HYD-1. The use of non-toxic soil stabilizers would require approval by the CCC prior to use.

**Comment K45:** Friends of Oceano Dunes states Draft Program EIR Section 2.3.3 does not define the factors it would consider when siting dust control measures, provide meaningful criteria for determine what projects the OHMVR Division would implement, or describe how the OHMVR Division would balance its obligations under various laws, plans, etc. Friends of Oceano Dunes also states Draft Program EIR Section 2.3.3 implies the proposed Dust Control Program could result in adverse impacts including take of listed species.

*Response to comment K45:* Friends of Oceano Dunes is incorrect and misinterprets the Draft Program EIR.

First, Draft Program EIR clearly identifies the factors the OHMVR Division would consider when siting individual dust control project. Specifically, Draft Program EIR page 2-25 states (emphasis added), "Although the precise location of vegetation plantings and seasonal dust control deployment is not known at this time, there are several environmental, technical, and logistical factors that would generally guide where the OHMVR Division could potentially plant vegetation and deploy seasonal dust control measures. These include Rule 1001 compliance, resource and recreation management considerations, and material availability and cost factors." The Draft Program EIR then proceeds to generally define these factors and provide examples of how the OHMVR Division would evaluate and consider these factors. As a point of clarification, the phrase "if all other factors are equal" refers to the environmental, technical, and logistical factors defined in Draft Program EIR Section 2.3.3.

Second, as explained in the response to Comment C4 (see Section 4.3 of this Final Program EIR), the Draft Program EIR does provide a general description of how the

OHMVR Division would apply the environmental, technical, and logistical factors described in Draft Program EIR Section 2.3.3 to balance a variety of public objectives under CEQA. The Draft Program EIR is clear that if all factors are equal the OHMVR Division would give preference and priority to projects that most support compliance with Rule 1001 (Draft Program EIR page 2-25). All factors may not be equal, however, in which the case the Draft Program EIR explains the OHMVR Division would emphasize projects that avoid adverse effects on natural and other park resources over projects that do not avoid adverse effects on natural and other park resources. For example, the Draft Program EIR identifies a significant and unavoidable impact to coastal vehicular recreation opportunities, meaning a project located within the open riding and camping area would be consistent with the findings of this Program EIR and would likely be approved without further CEQA review. In contrast, the Draft Program EIR does not identify a significant and unavoidable impact on biological or cultural resources, meaning a project that results in such an impact would not be within the scope of this Program EIR. While such a project (i.e., a project that significantly impacts biological or cultural resources) would not be preferred, it would also not be precluded; however, the project would be subject to additional environmental review in the form of a new Initial Study or EIR. Furthermore, factors such as material availability and costs would also inform the selection of specific dust control projects. Thus, the Draft EIR does provide sufficient information on how the OHMVR Division would give preference and priority to potential Dust Control Projects. As a point of clarification, it is not possible for the OHMVR Division at this time to provide a definite explanation of how these factors would affect the siting of individual, future dust control projects because each project would be subject to site-specific conditions that are not known at this time.

Finally, Comment 45 does not provide any specific evidence or example to support its statement that the proposed Program would result in adverse effects on biological resources such as take of listed species. Draft Program EIR Section 7.3.2, as revised by this Final EIR, describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on potential biological resources that could be present in and near the Program area. With these requirements, the proposed Program would not result in significant adverse impacts on biological resources and/or take of listed species.

**Comment K46:** Friends of Oceano Dunes states Draft Program EIR Figures 2-8 and 2-9 of the fail to clearly show western snowy plover critical habitat and are not clear what is meant by "high biological sensitivity." Friends of Oceano Dunes also states the Draft Program EIR should also provide the distance between critical habitat and the proposed Program area. Finally, Friends of Oceano Dunes states Figures 2-8 and 2-9 are misleading because they show "conceptual" vegetation areas that may be different than actual planting projects (resulting in substantially greater impacts to biological and recreation resources) and that it would be "more" accurate to assume the entire Program area may be covered with vegetation.

Response to comment K46: Friends of Oceano Dunes is correct - Figure 2-8 and Figure 2-9 do not show the western snowy plover final designated critical habitat As discussed in more detail in response to Comment K3 above, the OHMVR Division directs Friends of Oceano Dunes to Chapter 3 of this Final Program EIR, which contains new Figure 7-2 that graphically depicts the proposed Program area and western snowy plover critical habitat at a larger scale. The western snowy plover critical habitat and the Dust Control Program area are adjacent, but they do not overlap. The area depicted as a "high

biological sensitivity" area along the shoreline is more than just western snowy plover critical habitat but rather indicates suitable breeding habitat for western snowy plover and California least tern.

The OHMVR Division disagrees with Friends of Oceano Dunes characterization that Figures 2-8 and 2-9 are misleading. As the Draft Program EIR discusses in Section 1.3, page 1-12, a Program EIR is intended to provide information with a general level of detail because the subsequent, specific activities of the Program are yet to be defined in detail. Page 2-29 of the Draft Program EIR explains that Figures 2-8 and 2-9 show concept locations and that actual locations may vary. The Draft Program EIR is adequate because it does presume vegetation installation or seasonal dust control measures could be installed anywhere within the 690-acre primary Program area. See, for example, the Draft Program EIR's discussion of vegetation and seasonal dust control measures and their potential location in Draft Program EIR Impact BIO-1 and Draft Program EIR Impact CUL-1.

**Comment K47:** Friends of Oceano Dunes states Draft Program EIR Section 2.3.4.1 does not define the term "maximum extent feasible" or articulate which of the statutes, laws, and plans, etc. would take priority.

Response to comment K47: Comment noted. As explained in response to Comment K25 above, the term "maximum extent feasible" is used within the context of CEQA and the state CEQA guidelines, which define "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (PRC Section 15364)."

With regards to the priority of various statutes, laws, and plans, the OHMVR Division has, as explained in more detail in response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), prepared a Program EIR with clear and flexible Program objectives that balance a variety of factors and public objectives. A major reason for the preparation of a Program EIR with clear and flexible objectives is the uncertainty surrounding the magnitude of the dust control measures needed to comply with Rule 1001. The OHMVR Division would implement Program activities in compliance with all applicable plans, statutes, etc., and no one provision of any plan, policy, or statute would necessarily take priority over another. As noted in response to Comment C4, the OHMVR Division, as CEQA Lead Agency, is required to balance the proposed Program's economic, legal, social, technological, and other benefits and determine if these benefits outweigh the proposed Program's adverse environmental effects.

**Comment K48:** Friends of Oceano Dunes states it strongly objects to the alternate dust control program scenario described in Section 2.3.4.2 and that is inappropriate for the EIR to identify this scenario as the "worst-case" scenario.

Response to comment K48: As explained in more detail in response to CCC Comment C5 (see Section 4.3 of this Final Program EIR), the discussion of the preferred and alternate Dust Control Program scenarios provided in Draft Program EIR Section 2.3.4 is intended to facilitate public understanding of the proposed Program and the OHMVR Division's evaluation of potential environmental effects associated with the implementation of the proposed Program. As a point of clarification, Draft Program EIR Section 2.3.4 does not state the alternate scenario is the "worst-case scenario" as Friends of Oceano Dunes states. While it is true Draft Program EIR Section 2.3.4 does state, "The alternate [Dust Control Program] scenario represents the worst-case impact to public recreation lands at

Oceano Dunes SVRA," the Draft Program EIR evaluates both the preferred (up to 78 acres) and alternate (up to 113 acres) scenarios and concludes both scenarios would result in a significant impact on coastal vehicular recreation lands.

**Comment K49:** Friends of Oceano Dunes states the Draft EIR does not adequately discuss that OHV riding activity will be impacted every month.

Response to Comment K49: Friends of Oceano Dunes is incorrect. The Draft EIR discusses and considers both temporary (or seasonal) and permanent impacts on OHV recreation. The OHMVR Division directs Friends of Oceano Dunes to the discussion under Draft Program EIR Impact REC-1, which states (page 4-22 to 4-23, emphasis added), "As shown in Table 4-8 and Table 4-9, the proposed Dust Control Program could occupy between 78 and 113 acres of land at Oceano Dunes SVRA where vehicle activity is permitted (i.e., the SVRA's open riding and camping area). *Under the OHMVR* Division's preferred scenario, approximately 35 acres of land inside the Oceano Dunes SVRA open riding and camping area would be vegetated, protected, and permanently closed to OHV recreation. Under the alternate scenario, approximately 70 acres of land in the Oceano Dunes SVRA open riding and camping area would be vegetated, protected, and permanently closed to OHV recreation. In addition, under both scenarios, the OHMVR Division would protect and close, on a seasonal basis (March 1 to September 30), approximately 43 acres of land inside the open riding and camping area due to the installation of wind fencing or other seasonal dust control measures and associated monitoring equipment that pose a safety risk to OHV riders." The discussion under Impact REC-1 goes on to acknowledges that Oceano Dunes SVRA provides a unique opportunity for recreation that has been substantially limited and reduced over time, and that the loss of between 78 to 113 acres of OHV recreation lands would constitute an approximately 5.3 to 7.7 percent loss in OHV recreation lands at the SVRA. This is considered a significant impact of the proposed Dust Control Program.

**Comment K50:** Friends of Oceano Dunes reiterates the proposed dust control annual review process does not provide for public notice, review, or input.

*Response to Comment K50:* Refer to the response to comment K21.

**Comment K51:** Friends of Oceano Dunes states the Draft Program EIR designates State Parks as both a lead agency and trustee agency under CEQA and requests clarification on the significance of, and any potential conflicts with, these dual roles.

Response to Comment K51: The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Sections 1.2 and 1.4.1. Draft Program EIR explains defines Lead Agency and explains that CEQA and the CEQA Guidelines establish the OHMVR Division as the Lead Agency for the proposed Program. Draft Program EIR Section 1.4.1 explains that the OHMVR Division of CDPR is also considered a Trustee Agency because it is a state agency with jurisdiction by law over the natural resources held in trust for the people of the State of California. There is no "significance" associated with these dual roles, except to that extent that the OHMVR Division has the responsibility to ensure its actions protect the resources of State Parks system. In addition, there is no conflict associated with the OHMVR Division's role as both a Lead Agency and Trustee Agency.

**Comment K52:** Friends of Oceano Dunes states the OHMVR Division appears to propose Standard and Specific Project Requirements and notes the OHMVR Division needs to identify the source of such requirements, such as a regulation, policy, or other specific citation.

Response to Comment K52: The Standard and Specific Project Requirements listed in Draft Program EIR Table 2-5 consist of measures that are known to minimize and reduce potential adverse environmental effects, such as survey requirements, buffer areas, and design features. The standard project requirements reflect generic measures, whereas the specific project requirements have been tailored to the resources at Oceano Dunes SVRA and the proposed Program activities. The requirements are not contained in any specific regulation, policy, or guidance document, but reflect typical best management practices implemented by environmental professionals in general and that the OHMVR Division has adopted specifically for the proposed Program.

**Comment K53:** Friends of Oceano Dunes states that to the extent the standard project requirements identified in the Draft Program EIR are of general applicability, they are therefore a regulation under the Administrative Procedure Act and must be adopted in accordance with this act's notice and procedure.

Response to Comment K53: Comment noted. The Administrative Procedure Act prohibits a state agency from issuing a regulation unless it has been adopted and filed with the Secretary of State. The Act defines the term regulation to mean "every rule, regulation, order, or standard of general application or the amendment, supplement, or revision of any rule, regulations, order, or standard adopted by any state agency to implement, interpret, or make specific the law enforced or administered by it, or to govern its procedure (California Government Code Section 11342.600)." As noted on Draft Program EIR page 3-1, "The EIR incorporates SPRs into the proposed Program activities and components that are designed to minimize impacts to the existing environmental setting. The application of SPRs is presumed and therefore they are not considered mitigation measures but rather resource protection measures that are part of the proposed project." As such, these requirements apply to the proposed Dust Control Program only and are note of "general applicability." They also are not relevant to any law or procedure of law enforced or administered by the OHMVR Division and as such are not subject to the California Administrative Procedure Act.

**Comment K54:** Friends of Oceano Dunes states it is not clear how the OHMVR Division will "disturb and occupy as little land as possible" or simultaneously comply with the SVRA Act, land use law and plans, environmental law, and Rule 1001.

Response to Comment K54: The OHMVR Division has incorporated a requirement to minimize ground disturbance and land occupancy into the proposed Program. As specified in this requirement (see Draft Program EIR Table 4-5), the OHMVR Division would accomplish this by identifying the minimum area required to complete planned work activities, designating this minimum area, using existing paths of travel to access work areas, and restoring all disturbed areas to the maximum extent feasible. In addition, as discussed in more detail in response to Comment K47 above, the OHMVR Division would implement Program activities in compliance with all applicable plans, statutes, etc. and no one provision of any plan, policy, or statute would necessarily take priority over another.

**Comment K55:** Friends of Oceano Dunes states the EIR includes a requirement for the OHMVR Division to restore all disturbed areas to the maximum extent feasible but does not

define the phrase "maximum extent feasible." Friends of Oceano Dunes also states that if the OHMVR Division disturbs areas that support sensitive or listed species, restoring the area to the maximum extent feasible may nonetheless result in "take" of the species, which is inconsistent with the Federal and California Endangered Species Acts.

Response to Comment K55: CEQA and the state CEQA Guidelines define "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (PRC Section 15364)." The Draft Program EIR included a requirement to restore all disturbed areas to the maximum extent feasible because it may not possible to restore disturbed areas to the exact same pre-project conditions. For example, restored sensitive dune vegetation is subject to growing season conditions that may reduce the efficacy of the restoration project. Friends of Oceano Dunes does not provide specific evidence why restoring disturbed areas to the maximum extent feasible would result in take of listed sensitive or listed plant or wildlife species. But, as a point of clarification, the OHMVR Division notes that even if restoration projects are hampered by environmental or other technological factors, the proposed Program would not result in take or other significant effects on sensitive or listed species. As explained in more detail in the response to CDFW Comments B4 and B5, the Draft Program EIR includes detailed information on the biological resources present at and in the vicinity of the Program area, the regulations that govern these resources (including CESA and FESA), and the potential impacts associated with proposed Program activities. In addition, Draft Program EIR Section 7.3.2, as revised by this Final EIR, describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on potential biological resources that could be present in and near the Program area. These requirements include, but are not limited to, site-specific surveys for biological resources prior to implementing specific dust control activities. Furthermore, the annual review process involves reporting (to the CCC and appropriate wildlife agencies) on measures incorporated into the planned activities to avoid or minimize potential adverse impacts on sensitive biological resources. Thus, the proposed Program would not be inconsistent with CESA or FESA.

**Comment K56:** Friends of Oceano Dunes states the Draft Program EIR fails to discuss, analyze, and/or provide substantial evidence to document that the requirements the OHMVR Division has incorporated into the Dust Control Program to minimize and /or avoid impacts on special-status plant species are adequate and sufficient for doing so.

Response to Comment K56: Comment noted. The OHMVR Division disagrees with Friends of Oceano Dunes and notes Comment K56 does not provide any specific evidence explaining why the special-status plant requirements incorporated into the proposed Program are insufficient and/or inadequate, nor provide any specific recommendation for alternative avoidance protocols, buffer sizes, etc. The special-status plant requirements incorporated into the proposed Program are adequate for the following reasons:

• First, USFWS and CDFW protocols for special-status plant species do not define what an appropriate survey area is and instead require that the surveys are comprehensive over the entire site, including areas that will be directly or indirectly impacted by the project. As described in Draft Program EIR Section 7.3.2, as revised by Section 3.7 of this Final Program EIR, the OHMVR Division is proposing to survey for the presence of special-status plants during the

appropriate blooming period in and within 100 feet of work areas and access paths. The OHMVR Division would use a 100-foot survey area because no impacts from Program activities (e.g., planting vegetation, installing wind fencing or straw bales, planting trees, installing meteorological monitoring equipment) are expected to occur greater than 100 feet from the work area or access path. In addition, the Standard and Specific Project Requirements for special-status plants in Draft Program EIR Section 7.3.2 (page 7-18) establish that surveys follow protocols established by the USFWS, CDFW, and CNPS for special-status plants. Therefore, the surveys for special-status plants proposed in the Draft EIR are consistent with state and federal regulations for special-status plants.

- Second, Friends of Oceano Dunes is incorrect when it states the Draft Program EIR fails to define what it means to "protect" a plant. The Draft Program EIR special-status plant requirement first states (page 7-18), "A qualified biologist shall map, flag, and protect special-status plants identified during surveys." Then, importantly, the requirement defines (in sub-bullets) how special-status plants shall be protected. Specifically, the Draft Program EIR special-status plant requirement states (page 7-18), "The qualified biologist shall establish clear avoidance areas around special-status plant locations. This avoidance area shall provide a minimum 25-foot buffer from all work activities (the biologist may establish a larger buffer if appropriate). Sturdy, visible fencing or other protective features shall be installed around all avoidance areas. Fencing shall be securely staked and installed in a manner that would be reasonably expected to withstand winds and sand transport levels typical of Oceano Dunes SVRA. Fencing and other protective features shall be removed upon completion of work activities." Thus, the Draft Program does define how the OHMVR Division shall protect special-status plant species.
- Finally, Friends of Oceano Dunes notes the Draft Program EIR lacks substantial evidence to establish that a 25-foot buffer is adequate to avoid impacts on specialstatus plants. As a point of clarification, the 25-foot buffer requirement is a minimum requirement. Specifically, the Draft Program EIR special-status plant requirement states (page 7-18, emphasis added), "The qualified biologist shall establish clear avoidance areas around special-status plant locations. This avoidance area shall provide a minimum 25-foot buffer from all work activities (the biologist may establish a larger buffer if appropriate)." This buffer is based on the OHMVR Division's field experience with the special-status species known to occur in the Program area, as well as the Program activities proposed, and would minimize and avoid Program impacts for most of the special-status plants with the potential to occur in the Program area. As stated above, a larger buffer would be established if warranted by species- and site-specific conditions. For example, a larger buffer may be necessary to ensure associated species, canopy, or other cover is not removed during work activities. In sum, this standard and specific project requirement was created with the flexibility to ensure that specialstatus plants are protected from impacts by establishing the appropriate buffer to ensure that no direct or indirect impacts occur.

Thus, for the reasons described above, the requirements the OHMVR Division has incorporated into the proposed Dust Control Program to avoid and/or minimize potential

adverse impacts on special-status plants are sufficient and do not require substantial revision.

**Comment K57:** Friends of Oceano Dunes reiterates the Draft Program EIR's requirement for replanting and restoration of disturbed areas fails to identify any standard for compensating for the loss of special-status plants or any criteria for determining such a standard.

*Response to Comment K57:* Refer to the response to Comments K54, K55, K56, K74, K80, K105, and K106.

**Comment K58:** Friends of Oceano Dunes states the Draft Program EIR fails to discuss, analyze, and/or provide substantial evidence to document that the requirements the OHMVR Division has incorporated into the Dust Control Program to minimize and /or avoid impacts on special-status amphibian and reptile species are adequate and sufficient for doing so.

Response to Comment K58: Comment noted. The OHMVR Division disagrees with Friends of Oceano Dunes and notes Comment K58 does not provide any specific evidence explaining why the special-status amphibian and reptile requirements incorporated into the proposed Program are insufficient and/or inadequate, nor provide any specific recommendation for alternative avoidance protocols, buffer sizes, etc. The Draft Program EIR's requirements to minimize and/or avoid impacts to special-status amphibians and reptiles include: pre-construction surveys within 100 feet of work areas to determine if special-status amphibian and reptile species are present; coordination with and approval from CDFW to capture and relocate special-status amphibians and reptiles found during the pre-construction surveys; site management measures to avoid attracting animals to work areas (e.g., preventing trash and open trenches); and employee education to ensure workers can properly identify and avoid special-status amphibians and reptiles impacts. These measures would minimize and avoid impacts to special-status amphibian and reptile species. Furthermore, as described in the response to CDFW Comment B4 and Comment B5, the OHMVR Division is also proposing an annual review process as part of the EIR that consists of planning, resource evaluation, agency reporting and review, and implementation phases (Draft Program EIR Section 2.4.1). The OHMVR Division notes that the resource evaluation phase of the review process includes a requirement to conduct biological resource evaluations for specific project locations at appropriate time periods (e.g., blooming seasons), which would ensure that impacts to species at specific dust control project locations are identified and addressed prior to implementing the project.

**Comment K59:** Friends of Oceano Dunes states the Draft Program EIR purports to leave the EIR's requirements pertaining to minimizing and avoiding impacts on California red-legged frog to an "unspecified" biologist without any requirement for the biologist to follow appropriate protocols. Friends of Oceano Dunes also states the requirement makes no effort to establish any specific standard.

Response to Comment K59: Friends of Oceano Dunes has misinterpreted the Draft Program EIR. First, the Draft Program EIR does not identify that an "unspecified" biologist is responsible for implementing California red-legged frog avoidance and minimization requirements. Nor does the Draft Program EIR omit requirements to follow protocols recommended by appropriate wildlife agencies such as the USFWS. Rather, the Draft Program EIR California red-legged frog requirement states (page 7-18, emphasis added), "Immediately prior to starting all work under the Dust Control Program, a qualified biologist shall survey the work site for California red-legged frogs. If found, the

biologist shall delineate and maintain an appropriate sized buffer and *contact the USFWS* to determine if moving the animal(s) is appropriate. As shown in Section 3.7 of this Final Program EIR, the OHMVR Division has revised the Draft Program EIR to include a definition of qualified biologist. In addition, the Draft Program EIR's California redlegged frog requirement specifies (emphasis added) "Only USFWS-approved biologists shall participate in activities associated with the capture and handling of California redlegged frogs." Thus, all relocations of California redlegged frog would be conducted in consultation with the USFWS and follow their guidance and standards. The OHMVR Division notes that CDFW does not have a separate protocol for California red-legged frog from the USFWS.

Second, the Draft Program EIR's California red-legged frog requirement establishes a clear standard: minimizing and avoiding impacts to this special-status species. The Draft Program EIR's requirements to minimize and/or avoid impacts to California red-legged frog, as revised by Section 3.7 of this Final Program EIR, include: pre-construction surveys to determine if California red-legged frog is present; establishment of an appropriate-sized avoidance buffer and/or coordination with and approval from USFWS to capture and relocate any California red-legged frogs found during the pre-construction surveys; site management measures to avoid attracting animals to work areas (e.g., preventing trash and open trenches); and employee education to ensure workers can properly identify and avoid California red-legged frog.

**Comment K60:** Friends of Oceano Dunes states the Draft Program EIR purports to leave the EIR's requirements pertaining to minimizing and avoiding impacts on special-status birds to an "unspecified" biologist without any requirement for the biologist to follow appropriate protocols established by the USFWS or CDFW. Friends of Oceano Dunes also states the Draft EIR's requirement to provide a 50-foot buffer around bird species is contrary to USFWS protocols for listed and special-status birds.

Response to Comment K60: Draft Program EIR Section 7.3.2 describes the requirements the OHMVR Division has incorporated into the Dust Control Program to minimize and avoid impacts on nesting and special-status birds that could be present in and near the Program area. These requirements include, but are not limited to, pre-construction nest surveys and the establishment of buffer zones around active nests. As shown in Section 3.7 of this Final Program EIR, the OHMVR Division has revised these requirements to state that the size of the buffer for non-listed nesting birds shall be determined by a qualified biologist and shall depend on the species and topography. The qualified biologist will evaluate Dust Control Program activities, the nesting bird species, and topography/visibility of the nest to determine the appropriate avoidance buffer size to ensure that nesting birds nearby the activities are not disturbed. The revisions shown in Section 3.7 of this Final Program EIR include a definition for qualified biologist and also modify and increase the minimum nest buffer requirements for non-listed raptors (from 300 feet to 500 feet) and other non-listed bird species (from 50 feet to 250 feet). These buffer zones are similar to those recommended in CDFW Comment B11 (see Section 4.2) in this Final Program EIR).

As a point of clarification, nesting and special-status bird requirements described in the Draft Program EIR include separate measures for non-listed nesting birds and special-status nesting birds (e.g., burrowing owl, western snowy plover, California least tern). As a result, the general nesting bird measure does not apply to special-status nesting birds.

**Comment K61:** Friends of Oceano Dunes states the Draft Program EIR does not include appropriate buffers for impacts to wetlands. Friends of Oceano Dunes also state that the minimum buffer areas and setback areas appear "contrary" to state and federal laws protecting wetlands.

Response to Comment K61: The OHMVR Division disagrees with Friends of Oceano Dunes and notes Comment K61 does not provide any specific evidence explaining why the wetland habitat requirements incorporated into the proposed Program are inadequate and "contrary" to state and federal law, nor provide any specific recommendations or regulatory requirements for wetland habitat buffers. The OHMVR Division notes the wetland habitat requirements incorporated into the proposed Program are adequate for the following reasons:

- The Federal Clean Water Act requires the U.S. Army Corps of Engineers (USACE) Regional Water Quality Control Board to permit projects that place any dredged or fill material below the ordinary high water mark or mean high tide line of any water of the U.S. As explained in Draft Program EIR Section 7.3.4 and Impact BIO-4, the proposed Program will not place any dredged or fill material below the ordinary high water mark or mean high tide line of waters of the U.S.; therefore, the Program complies with the Federal Clean Water Act.
- California Fish and Game Code Section 1600 regulates activities that affect the
  flow, bed, channel, or banks of rivers, streams, and lakes. The Draft Program
  EIR's wetland habitat requirements prohibit the installation of any project feature
  within wetlands or other jurisdictional waters and establish a 150-foot setback
  from such areas. These requirements would ensure that no impacts to the flow,
  bed, channel, or banks of rivers, streams, and lakes would occur. Therefore, the
  proposed Program complies with California Fish and Game Code Section 1600 et
  seq.
- The California Coastal Act regulates impacts to wetlands within the coastal zone and recommends a minimum buffer width of 100 feet around wetlands. The Draft Program EIR's wetland habitat requirement establishes a 150-foot setback from wetlands and other jurisdictional waters. As a result, the proposed Program complies with the California Coastal Act.

**Comment K62:** Friends of Oceano Dunes states the Draft Program EIR's requirements for minimizing and avoiding impacts to nesting and special-status birds do not appear to distinguish between sensitive birds, birds listed as endangered or threatened under state or federal ESAs, or fully protected species.

Response to Comment K62: Friends of Oceano Dunes is incorrect. The OHMVR Division directs Friends of Oceano Dunes to pages 7-13 to 7-16 of the Draft Program EIR, which discusses special-status birds that have a moderate to high potential to occur in the Program Area. The OHMVR Division also directs Friends of Oceano Dunes to updated EIR Appendix B, which provides a full list special-status bird species that could occur near the Program area, their listing status, and likelihood of occurrence. Finally, the OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 7.3.2, as revised by Section 3.7 of this Final Program EIR, which includes the requirements the OHMVR Division has incorporated into the proposed Program to minimize and avoid impacts to migratory bird species, as well as threatened, endangered, and/or fully protected birds that are presumed present in the Program area, including California

burrowing owl, California least tern, and western snowy plover. The OHMVR Division notes requirements for burrowing owl avoidance generally follow the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012<sup>12</sup>). The Draft Program EIR establishes a minimum 100-foot buffer around occupied burrows since Program activities are expected to have a low disturbance level. The OHMVR Division recognizes that buffers around burrowing owl burrows are important to protect the burrowing owls from potential disturbance from nearby Program activities. The establishment of a 100-foot buffer is based on past field experience with the burrowing owl in the Program area, the Program activities proposed, as well as the knowledge that burrowing owl do not breed in the Program area. Therefore, a minimum 100-foot buffer would provide a suitable level of protection from Program impacts in most instances. The OHMVR Division has revised this requirement such that a qualified biologist would increase the buffer area if it was determined that a larger buffer was necessary to reduce disturbance (see Section 3.7 of this Final Program EIR. See also the response to Comment K60.

**Comment K63:** Friends of Oceano Dunes states the Draft Program EIR's requirements to "minimize" the facilitation of predator movement into known nesting areas for western snowy plover and California least tern virtually ensures take will occur as a result of Dust Control Program activities and notes the EIR identifies that it may not be not feasible to avoid predator movement. As such, Friends of Oceano Dunes states the proposed Program is inconsistent with the federal and state Endangered Species Acts.

Response to Comment K63: The OHMVR Division disagrees with Friends of Oceano Dunes. Draft Program EIR Impact BIO-2 (page 7-23), as revised by Section 3.7 of this Final Program EIR, identifies that predation on western snowy plover and/or California least tern as a result of Program implementation would not be significant with the implementation of Standard and Specific Project Requirements. Program activities would avoid planting vegetation within western snowy plover critical habitat or active nest areas. As a result, western snowy plover and California least tern nesting habitat would remain open (or wide) and sparsely vegetated, which would allow western snowy plover and California least tern to detect predators moving towards the nest location early enough to escape.

Furthermore, Draft Program EIR Section 7.3.2, as revised by Section 3.7 of this Final Program EIR, specifically includes requirements pertaining to predator management and control related to Program activities. As explained in Section 2.1.3 of this Final Program EIR, the OHMVR Division's predator management strategy and methods have been successful at protecting breeding western snowy plover and California least tern. The methods implemented have increased the overall population (i.e., number of breeding adults) and reproductive success (i.e., number of fledglings per nesting pair) for both western snowy plover and California least tern in the Oceano Dunes District. Given the experience and results with existing predator management and control at Oceano Dunes SVRA, the Draft Program EIR appropriately concludes that the implementation of similar predator management strategies for the proposed Dust Control Program would render any impacts to western snowy plover and California least tern from planting 100 acres of vegetation in the Program area less than significant.

<sup>&</sup>lt;sup>12</sup> CDFW. 2012. Staff Report on Burrowing Owl Mitigation. Sacramento, California.

Refer also to response to Comment K65 below for more information on this issue.

**Comment K64:** Friends of Oceano Dunes notes California brown pelican is a Fully Protected Species and states the Draft Program EIR contains no analysis of the potential for take of this species as a result of Program activities.

Response to Comment K64: California brown pelican nesting colonies and communal roosts are fully protected in California (CDFW 2016). The OHMVR Division directs Friends of Oceano Dunes to updated EIR Appendix B, which addresses the California brown pelican and concludes that no breeding or communal roosting habitat for this species is present in proposed Program area, although some foraging habitat is present. California brown pelican nest colonies are located from the Channel Islands in the Southern California Bight (approximately 100 miles south of the Program area) to the islands off Nayarit, Mexico. Brown pelicans have not nested north of the Channel Islands since the late 1950s. The OHMVR Division has however, observed some individual and/or small groups of California brown pelicans resting on the shoreline near the proposed Program area. These resting individuals or groups of pelicans could be temporarily disturbed during travel to/from seasonal dust control areas). Although only nesting colonies and communal roosts of California brown pelican are fully protected, the OHMVR Division has incorporated Standard and Specific Project Requirements into the Dust Control Program to avoid and minimize disturbance to California brown pelican and other special-status species. Specifically, for California brown pelican, these would include a requirement for OHMVR Division staff to scan ahead while driving to avoid special status birds and limiting vehicle speeds to 15 miles per hour. With these requirements, the proposed program would not result in any direct or indirect impacts to this species.

**Comment K65:** Friends of Oceano Dunes states the Draft Program EIR's requirements for minimizing and avoiding impacts to nesting and special-status birds neglect to control for the likely increased predation by red foxes, coyotes, skunks, and opossums that will use the additional 100 acres of vegetation as cover. In addition, Friends of Oceano Dunes submits a biological analysis as evidentiary support for its statement.

Response to Comment K65: First, as points of clarification regarding the Draft Program EIR's analysis of potential impacts to western snowy plover and California least tern, the OHMVR Division notes:

• Friends of Oceano Dunes' statement that the Draft Program EIR "neglects to create any" requirement to control increased predation of western snowy plover and California least tern is incorrect. The OHMVR Division directs Friends of Oceano Dunes to the Draft Program EIR's discussion under Impact BIO-2 (page 7-23), which specifically states, "Although the OHMVR Division has developed the Dust Control Program area to avoid critical habitat and seasonal nesting exclosure areas, vegetation – and to a lesser degree wind fencing – that is planted on the western part of the Dust Control Program area could impact active nests by providing habitat for predators to hide and stalk nesting western snowy plovers and California least terns. In addition, protective perimeter fence posts, wind fencing, and some temporary dust and meteorological monitoring equipment would be tall and sturdy enough to provide perching habitat for common ravens, gull species, raptors, or other avian species that could prey on western snowy plover and/or California least tern nests . . . ." In addition, Draft Program EIR

Section 7.3.2, as revised by Section 3.7 of this Final Program EIR, specifically includes requirements pertaining to predator management and control related to Program activities. As explained in Section 2.1.3 of this Final Program EIR, although predation is an ongoing factor affecting snowy plover and least tern nesting, the OHMVR Division's predator management strategy and methods have been successful at protecting breeding western snowy plover and California least tern populations, which together have increased in terms of both overall numbers of breeding adults and reproductive success at the Oceano Dunes District. Given the experience and results with existing predator management and control at Oceano Dunes SVRA, the Draft Program EIR appropriately concludes that the implementation of similar predator management strategies for the proposed Dust Control Program would render any impacts to California least tern and western snowy plover from planting 100 acres of vegetation less than significant.

As clarified and described in Section 3.7of this Final Program EIR, the more significant concern with planting additional vegetation in the proposed Program area is that the vegetation could reduce available western snowy plover and California least tern breeding and/or wintering habitat by decreasing the amount of open, wide beaches. Previous studies have found that western snowy plover and California least tern select habitats that are open (or wide) and have less vegetative cover in order to facilitate early detection of predators and reduce predation risk (Muir and Colwell 2010, Brindock and Colwell 2011, Patrick and Colwell 2014). Reducing western snowy plover and California least tern habitat by planting vegetation in suitable habitat for these species could lead to less open (or wide), sparsely vegetated beaches and could, thus, increase predation on adults, chicks, and/or eggs if western snowy plover and California least tern are not able to detect predators moving towards the nest location. The Draft Program EIR (Chapter 7) sufficiently addresses this impact and ensures it is reduced to a less than significant level by avoiding suitable western snowy plover and California least tern habitat in the Program Area (i.e., western snowy plover critical habitat, active nesting areas, and near-shore areas).

Second, as explained in more detail below, the OHMVR Division has reviewed the evidentiary support provided by Friends of Oceano Dunes (attached as Exhibit 6 to Friends of Oceano Dunes comments) and concluded the biological analysis does not constitute significant new information, nor does it substantially change the EIR's analysis and conclusions regarding potential impacts on western snowy plover and California least tern. In addition, as explained in more detail below, the OHMVR Division disagrees with several of the specific points raised by the biological analysis.

• The biological analysis states the Draft Program EIR "misrepresents" the proximity of the proposed project to western snowy plover habitat. The OHMVR Division disagrees with this characterization. As explained in more detail in the response to Comment K3, the final designation of western snowy plover critical habitat does not discuss the western boundary of the critical habitat; however, the description of habitat indicates that the western boundary is not the mean high tide line, but rather farther west encompassing more of the intertidal zone. In addition, as explained in more detail in response to Comment K3, the location of the western snowy plover critical habitat area depicted on Draft Program EIR Figure 2-5 and new Figure 7-2 (see Chapter 3 of this Final Program EIR) consists

- of GIS data provided by the USFWS via its critical habitat portal (USFWS 2016). This data indicates the critical habitat area extends approximately 1,100 feet inland from the Pismo State Beach western boundary and borders the northern extent of the proposed Dust Control Program area (between marker posts 4 and 5), but is approximately 240 feet west of the southern extent of the proposed Program area (near marker post 7). Thus, the proposed Dust Control Program area borders, but does not overlap with or otherwise include, USFWS-designated critical habitat for western snowy plover. No vegetation will be planted within critical habitat as part of the Program activities.
- The biological analysis states that the Oceano Dunes SVRA Technical Review Team (TRT), as illustrated by discussions at its December 11, 2015, meeting, recognized the problems associated with the overgrowth and spread of vegetated islands and hummocks in plover and tern nesting habitat. The biological analysis indicates that the TRT's concerns are related to predators denning, resting, or hunting in these vegetated areas. The OHMVR Division disagrees with this interpretation of the TRT concerns raised in the TRT meeting. As described the December 11, 2015, meeting notes, the TRT discussed concerns related to the reduction in suitable habitat for western snowy plover and California least tern. Specifically, the TRT was concerned that the vegetated islands and hummocks were reducing the amount of available open habitat with sparse vegetation for western snowy plover and least tern nesting, foraging, and roosting. The meeting notes do not address concerns about the habitat the vegetation islands and hummocks are providing for potential mammalian predators.
- The biological analysis states the proposed Dust Control Program will increase predation on western snowy plovers and California least terns. Although the biological analysis does not explicitly state why this is true, the basis for this statement appears to located on page 4 of the analysis, which states, "It is readily apparent from Figure C.1 from the 2015 plover and tern nesting report that these species avoid nesting near vegetated areas. And, figures C2 to C10 show that, virtually all depredated nests are in or adjacent to vegetated areas." While the OHMVR Division concurs that predators and predation can, in general, be an important factor limiting California least tern and western snowy plover reproductive success, it does not agree that the proposed Program's specific activities would increase predation on western snowy plovers and California least terns for the following reasons. First, the proposed Program avoids planting vegetation within critical habitat area entirely, and most of the proposed Program area is set back 50 feet or more from critical habitat area. Thus, the proposed Program would not result in the establishment of vegetation that could support a den or otherwise provide cover for predators within critical habitat area. Second, the OHMVR Division has conducted a literature review to determine if a relationship between vegetation near shorebird nesting sites and predation on shorebird eggs, chicks, and adults has been identified. But no studies were found that conclusively documented a direct relationship between predation on shorebirds, including western snowy plover and California least tern, and vegetation near the nest sites. In addition, as described in Section 2.1.1.2 of this Final Program EIR, many beaches that support western snowy plover nesting, foraging, and wintering are already bordered to the east by dense stands of European beach grass (Ammophila arenaria) (Patrick and Colwell 2014), which

can provide suitable cover habitat for mammalian predators. Thus, the mere presence of adjacent vegetation does not preclude nesting activity nor guarantee predation would occur. Third, as shown in Section 2.1.4 of this Final Program EIR and presented in the biological analysis submitted by Friends of Oceano Dunes, predation of western snowy plovers and California least terns by coyote is well documented at Oceano Dunes SVRA and part of the existing environmental conditions, regardless of the proposed Program. Thus, in order to result in a significant, adverse change on the environment, the proposed Program would need to increase the likelihood of predation. This would not occur as a result of the proposed Program activities. Planting 100 acres of vegetation could provide some additional cover habitat for potential mammalian predators, but this vegetation would be outside the critical habitat areas (meaning predators would have to traverse open sand areas) and would not significantly increase the number of potential predators in the Program Area or the amount of predation on California least tern and western snowy plover. Furthermore, as described in Section 2.1.3.1 of this Final Program EIR, species known to be predators of California least tern and western snowy ployer are monitored, documented, and relocated or lethally removed, further reducing the likelihood that the proposed Program activities would increase predation of western snowy plover and California least tern.

**Comment K66:** Friends of Oceano Dunes notes the Draft Program EIR identifies that the proposed Program is within the jurisdiction of the City of Grover Beach and SLO County, which have Local Coastal Programs (LCP) certified by the CCC. Friends of Oceano Dunes states the OHMVR Division should consider the contents and findings of these LCP's "to promote efficiency and goodwill" between agencies.

Response to Comment K66: Comment noted. The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Chapter 5, page 5-1, which states (emphasis added), "The proposed Dust Control Program would be located on state-owned and stateoperated land that, with the exception of coastal development permitting usually conducted through local agencies, is not subject to local land use restrictions and zoning regulations. For the proposed Dust Control Program, the OHMVR Division, SLO County, the City of Grover Beach, and the CCC have consented to a consolidated CDP process (pursuant to California Public Resource Code Section 30601.3) by which the CCC will process and act upon the OHMVR Division's CDP application. Under this process, the standard of review will follow Chapter 3, Coastal Resources Planning and Management Policies, of the California Coastal Act, and the CCC will use the appropriate LCPs as a reference and guidance document when acting upon the consolidated CDP. Accordingly, this chapter focuses on the Program's conformance with Chapter 3 of the Coastal Act." Thus, there is no need for the OHMVR Division to consider the content and findings of the Grover Beach and SLO County LCPs in the Draft Program EIR.

**Comment K67:** Friends of Oceano Dunes states the Draft Program EIR illegally incorporates Standard and Specific Project Requirements that are "underground regulations" in violation of the Administrative Procedures Act.

Response to Comment K67: Comment noted. As explained in more detail in response to Comments K52 and K53 above, the Standard and Specific Project Requirements the OHMVR Division has incorporated into the proposed Program to minimize and avoid

potential adverse impacts apply to the proposed Dust Control Program activities only. They are not relevant to any law or procedure of law enforced or administered by the OHMVR Division and as such are not subject to the California Administrative Procedure Act.

**Comment K68:** Friends of Oceano Dunes states Oceano Dunes SVRA is established in an area that is uniquely suited for OHV recreation that cannot be replicated or replaced and that permanently removing portions of the SVRA by planting vegetation conflicts with PRC Section 5090.02(c)(1).

Response to Comment K68: The Draft Program EIR acknowledges the SVRA is situated in a unique location (see, for example, Draft Program EIR pages 2-4 and 4-23). In addition, the OHMVR Division considered both the ability of visitors to use similar facilities instead of Oceano Dunes SVRA and the legislative mandate and mission of the OHMVR Division in evaluating the proposed Program's recreation impacts (see Draft Program EIR pages 4-20 to 4-21). Friends of Oceano Dunes does not provide any specific evidence for why planting vegetation conflicts with Public Resources Code Section 5090.02(c)(1) that the OHMVR Division can respond to at this time; however, Draft Program EIR REC-1 is considered a significant and unavoidable impact of the proposed Program.

**Comment K69:** Friends of Oceano Dunes states the proposed Dust Control Program conflicts with PRC Sections 30001.5 and 30210 because it fails to maximize access and coastal recreational opportunities.

Response to Comment K69: This comment is consistent with information and findings in the Draft Program EIR. As explained in more detail in response to CCC Comments C6, C11, and C12 (see Section 4.3 of this Final Program EIR), response to Sierra Club Comment I3 (see Section 4.9 of this Final Program EIR), and response to Comments K5, K14, and K18 above, Draft Program EIR Impact LUP-2 concludes the proposed Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA. The OHMVR Division notes the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC.

**Comment K70:** Friends of Oceano Dunes states the proposed Dust Control Program conflicts with the California Constitution's right of public access to the beach by imposing barriers in the form of 100 acres of new vegetation islands.

Response to Comment K70: The proposed Dust Control Program does not conflict with the California Constitution. Draft Program EIR page 4-20 identifies that the proposed Program would not alter public access to Oceano Dunes SVRA and Pismo State Beach. In addition, Draft Program EIR Mitigation Measure REC-1 requires the OHMVR Division to integrate recreational opportunities into dust control measures, such as motorized and non-motorized trails through large, continuous blocks of planted vegetation. Thus, the public would continue to be able to ride or walk around, or walk through, any dust control measures installed as part of the proposed Program.

**Comment K71:** Friends of Oceano Dunes states planting more than 100 acres of "permanent and impermeable" vegetation is development that interferes with access to the sea in conflict with PRC Section 30211.

Response to Comment K71: The OHMVR Division disagrees with Friends of Oceano Dunes assertion that Program vegetation would be "impermeable." Visitor's would continue to be able to ride or walk around, or walk through, any new vegetation planted as part of the Dust Control Program. In addition, Draft Program EIR Mitigation Measure REC-1 requires the OHMVR Division to integrate recreational opportunities into dust control measures, such as motorized and non-motorized trails through large, continuous blocks of planted vegetation. Accordingly, the Draft Program EIR (page 4-20, Table 5-1) appropriately concludes the proposed Program would not alter existing public access to Pismo State Beach or Oceano Dunes SVRA. Refer also to response to Comment K70 above for more information on this issue.

**Comment K72:** Friends of Oceano Dunes states the proposed Dust Control Program creates obstacles and barriers that change topographic and geologic site characteristics and are inconsistent with PRC Section 30214 and 30255.

Response to Comment K72: Comment noted. As explained in more detail in response to Comments K27 and K43 above, the proposed Dust Control Program would not significantly impede, impact, or interfere with natural dune formation processes. Accordingly, Draft Program EIR Table 5-1 identifies that the proposed Program would not conflict with the Coastal Act provisions contained in PRC Section 30214 or 30255. Nonetheless, Draft Program EIR Impact LUP-2 concludes the proposed Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA. The OHMVR Division also notes the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC. Refer to response to CCC Comments C2, C6, and C11 (see Section 4.3 of this Final Program EIR) and response to Sierra Club Comment I3 (see Section 4.9 of this Final Program EIR), and response to Comments K5, K14, and K18 above for more information on this issue.

**Comment K73:** Friends of Oceano Dunes states planting more than 100 acres of "permanent and impermeable vegetation highlands" conflicts with PRC Section 30223 because it fails to reserve coastal upland areas necessary to support recreational uses.

Response to Comment K73: This comment is consistent with the information and findings in the Draft Program EIR. Draft Program EIR Table 5-1 notes the proposed Program could conflict with PRC Section 30223, and Draft Program EIR Impact LUP-2 concludes the proposed Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA. The OHMVR Division also notes the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC. Refer to the response to CCC Comments C6, C11, and C12 (see Section 4.3 of this Final Program EIR), response to Sierra Club Comment I3 (see Section 4.9 of this Final Program EIR), and response to Comments K5, K14, and K18 above for more information on this issue.

In addition, as explained in the response to Comment K71 above, the proposed Program vegetation would not be "impermeable" because visitors would continue to have access through and around any new vegetation planted as part of the Dust Control Program.

**Comment K74:** Friends of Oceano Dunes states the proposed Dust Control Program is inconsistent with the Coastal Act (PRC Section 30240) because it allows development in and

adjacent to ESHA. Friends of Oceano Dunes also states the Draft Program EIR provides no explanation for not following the applicable LCP and submits evidence that a CCC staff ecologist has publically commented that bare sand can be ESHA. The comment also notes PRC Section 30240 does not permit recreating ESHA habitat values in another location.

Response to Comment K74: First, as a point of clarification, the Draft Program EIR does not claim that any EHSA values will be recreated in a different location. Second, as described in Draft Program EIR Table 5-1, PRC Section 30240 protects ESHA from significant disruption of habitat values, limits development within ESHA to only uses dependent on the ESHA resources, and limits development adjacent to ESHA to uses that are compatible with the continuance of the ESHA. Accordingly, Draft Program EIR Table 5-1 explains the OHMVR Division has incorporated requirements into the proposed Dust Control Program that protect against significant disruption of habitat values, such as avoiding special-status species habitat, and that the proposed activities are dependent on the resources present at Oceano Dunes SVRA. Third, as explained in more detail in the response to Comment K66 above, the Draft Program EIR explains (page 5-1) the proposed Program is subject to a consolidated CDP process by which the CCC will act upon the OHMVR Division's CDP application. Under this process, the standard of review is Chapter 3, Coastal Resources Planning and Management Policies, of the Coastal Act, and not the applicable LCP (although the CCC may use the LCP as a guide when acting upon the CDP). Thus, there is no need for the OHMVR Division to consider the content and findings of the Grover Beach and SLO County LCPs in the Draft Program EIR. Finally, the Draft Program EIR contains information on ESHA similar to that provided by Comment K74. Specifically, Draft Program EIR Section 7.1.6 provides the Coastal Act definition of ESHA. In addition, Draft Program EIR page 7-24 states, "California's coastal dunes and the vegetation communities they support are generally considered to be sensitive because they support a number of special-status plant and wildlife species, such as those described in Section 8.3, because there are only 27 dune fields remaining in California (CCC 1987), and because they continue to be threatened by a number of factors. In addition, Oceano Dunes SVRA is considered ESHA by the SLO County Local Coastal Program."

**Comment K75:** Friends of Oceano Dunes notes the Draft Program EIR "inappropriately discounts" the impact on SVRA users by reducing the lands available for OHV recreation despite the fact the SVRA is already the third smallest SVRA in the state in terms of acreage.

Response to Comment K75: The c comment's information about Oceano Dunes SVRA's size and usage is consistent with the information in the Draft Program EIR; however, the Draft Program EIR does not discount the Dust Control Program's impact on recreational opportunity. The discussion under Draft Program EIR Impact REC-1 identifies that Oceano Dunes SVRA is a unique, popular destination that provides low-cost coastal OHV recreational opportunities that have been subject to historical reductions in acreage. Draft Program EIR REC-1 is considered a significant and unavoidable impact of the proposed Program.

**Comment K76:** Friends of Oceano Dunes states the Draft Program EIR fails to identify the location of lands within the SVRA that are owned by Phillips 66.

Response to Comment K76: Friends of Oceano Dunes is incorrect. The Draft Program EIR does describe the location of Phillips 66 lands located within Oceano Dunes SVRA. See, for example:

- Draft Program EIR Section 4.2.3 (page 4-10), which states "Approximately 845 acres of the SVRA is closed to all public access and recreation. This area is located in the eastern portion of Oceano Dunes SVRA (see Figure 2-2). This part of Oceano Dunes SVRA includes lands operated by the OHMVR Division but owned by Phillips 66 and lands leased from the OHMVR Division for agricultural purposes."
- Draft Program EIR Section 7.2 (page 7-5), which states "The southern border of the Program area is situated north of Oso Flaco and Little Oso Flaco lakes, and on the east are the Phillips 66 Leasehold. A small portion of the Program area overlaps with the Phillips 66 leasehold at the extreme southeast portion."
- Draft Program EIR Section 7.2.2.1 (page 7-11), which states "A portion of the habitat also occurs with a California Department of Transportation right-of-way and within the eastern portion of the Oceano Dunes SVRA on lands leased from Phillips 66, outside the riding area."

**Comment K77:** Friends of Oceano Dunes notes Draft Program EIR page 4-11 identifies beach and dune recreational opportunities at Oceano Dunes SVRA are coastal dependent recreational activities pursuant to the Coastal Act and should be protected and given priority under the Coastal Act.

Response to Comment K77: Comment noted. As explained in more detail in the response to Comment C12 (see Section 4.3 of this Final Program EIR), the OHMVR Division, at the request of the CCC, has revised the discussion on page 4-11 of the Draft EIR to indicate camping and OHV recreation at Pismo State Beach and Oceano Dunes SVRA may not be considered coastal-dependent development by the CCC. This revision does not change any of the Draft Program EIR's findings regarding the proposed Dust Control Program's potential impacts on recreation.

**Comment K78:** Friends of Oceano Dunes states that Draft Program EIR Section 4.2.3.1 indicates there are 1,530 acres open to vehicular recreation, which is inconsistent with similar statements elsewhere in the Draft Program EIR.

Response to Comment K78: As explained in the response to Comment K12 above, the Draft Program EIR was prepared using the most recent information available to the OHMVR Division. The Draft Program EIR consistently identifies the amount of acres open to OHV use as 1,453 acres, or approximately 1,450 acres (see, for example, Draft Program EIR Table 2-1, 4-6, 4-8, and 4-9), and the amount of acres open to all vehicular recreation (i.e., street legal and OHV use) as 1,531 acres or approximately 1,530 acres (see, for example, Draft Program EIR Table 2-1, 4-6, 4-8, and 4-9). Thus, the Draft Program EIR is consistent in its reporting of the OHV and total vehicular recreation lands at Oceano Dunes SVRA.

**Comment K79:** Friends of Oceano Dunes states Oceano Dunes SVRA provides more than 1,000 campsites on the beach with low-cost fees that are consistent with PRC Section 30213.

Response to Comment K79: Draft Program EIR Section 4.1.4 (page 4-3) described PRC 30213 and Draft Program EIR Section 4.2 (page 4-6, Table 4-2) discussed the number of beach campsites (exactly, but not more than,1,000) at Oceano Dunes SVRA. In addition, Draft Program EIR Section 4.2.3.3 states that these campsites represent a low-cost camping and recreation opportunity. Thus, the OHMVR Division concurs that Oceano Dunes SVRA provides low-cost camping opportunities; however, Draft Program EIR

Impact LUP-2 concludes the proposed Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA.

**Comment K80:** Friends of Oceano Dunes summarizes information from Draft Program EIR Section 4.3.2. Friends of Oceano Dunes reiterates the Draft Program EIR has miscalculated and misrepresented the percent of OHV recreation lands lost due to the proposed Dust Control Program and fails to identify an area, mitigation ratio, and standards or guidelines for replacing the loss of camping and OHV recreational opportunities caused by the proposed Program.

Response to Comment K80: Friends of Oceano Dunes' summary of Draft Program EIR Section 4.3.2 is accurate. Refer to the response to Comments K9 and K12 above for more information on OHV acreage and Mitigation Measure REC-1.

**Comment K81:** Friends of Oceano Dunes states the Draft Program EIR is not clear whether the standards from the certified LCP apply to the EIR's analysis.

Response to Comment K81: As explained in more detail in the response to Comment K66 above, the Draft Program EIR explains (page 5-1) the proposed Program is subject to a consolidated CDP process by which the CCC will act upon the OHMVR Division's CDP application. Under this process, the standard of review is Chapter 3, Coastal Resources Planning and Management Policies, of the Coastal Act, and not the applicable LCP (although the CCC may use the LCP as a guide when acting upon the CDP). Thus, there is no need for the OHMVR Division to consider the content and findings of the Grover Beach and SLO County LCPs in the Draft Program EIR.

**Comment K82:** Friends of Oceano Dunes notes it has previously requested evidence from the OHMVR Division and the CCC that the OHMVR Division has complied with PRC Section 30601.5 by inviting all persons and entities with a property interest to be co-applicants in the proposed Dust Control Program CDP permit. Friends of Oceano Dunes also notes the CCC cannot process the proposed Dust Control Program CDP without first complying with Public Resource Code Section 30601.5.

Response to Comment K82: Comment noted. As described in the response to Comment K24, matters pertaining to the CCC's administrative authority and procedures for processing a CDP application are outside the scope of the OHMVR Division's CEQA review of the proposed Dust Control Program.

**Comment K83:** Friends of Oceano Dunes again states the proposed Dust Control Program is inconsistent with the Pismo State Beach and Pismo Dunes SVRA General Development Plan and Resource Management Plan.

Response to Comment K83: The Draft Program EIR contains information consistent with Comment K83. As explained in the response to SLOAPCD Comment D10 (see Section 4.4 of this Final Program EIR) and Comments K13 and K16 above, Draft Program EIR Impact LUP-1 identifies that the proposed Dust Control Program would conflict with the General Development Plan.

**Comment K84:** Friends of Oceano Dunes summarizes information in Draft Program EIR Section 5.1.2 and states the Draft Program EIR is inconsistent regarding jurisdiction for the proposed Dust Control Program CDP.

Response to Comment K84: The Draft Program EIR is consistent regarding jurisdiction for the proposed Dust Control Program CDP. Draft Program EIR Section 5.1.2, explains

that CDP permitting authority is typically delegated to the local government following certification of an LCP; however, the section also describes situations where the CCC retains original permit authority, including development on public trust lands in the Coastal Zone. Furthermore, as described in more detail in the response to Comment K66 above, the Draft Program EIR explains (page 5-1) the proposed Program is subject to a consolidated CDP process by which the CCC will act upon the OHMVR Division's CDP application. Under this process, the standard of review is Chapter 3, Coastal Resources Planning and Management Policies, of the Coastal Act, and not the applicable LCP.

**Comment K85:** Friends of Oceano Dunes reiterates the Draft Program EIR, in various places, determines the proposed Dust Control Program "may not be consistent" with the Coastal Act. Friends of Oceano Dunes reiterates the OHMVR Division needs to make a determination regarding the proposed Program's consistency with the Coastal Act.

Response to Comment K85: Refer to the response to Comment K14 above.

**Comment K86:** Friends of Oceano Dunes states the proposed Dust Control Program violates PRC Section 30213 because it does not maximize, protect, or encourage recreational opportunities and low-cost visitor and recreational facilities.

Response to Comment K86: This comment is generally consistent with the information and findings in the Draft Program EIR. Draft Program EIR Table 5-1 describes the proposed Program could conflict with PRC Section 30213, and Draft Program EIR Impact LUP-2 concludes the proposed Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA. The OHMVR Division also notes the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC. Refer to the response to CCC Comments C6, C11, and C12 (see Section 4.3 of this Final Program EIR), response to Sierra Club Comment I3 (see Section 4.9 of this Final Program EIR), and response to Comments K5, K14, and K18 above for more information on this issue.

**Comment K87:** Friends of Oceano Dunes states the proposed Dust Control Program violates PRC Section 30214 because it impedes the natural dune formation process, which would substantially and adversely impact topography and geologic site characteristics.

Response to Comment K87: As explained in more detail in response to Comment K27, Draft Program EIR Section 3.4.3 identifies why the proposed Dust Control Program would not significantly impede, impact, or interfere with natural dune formation processes, and Draft Program EIR Table 5-1 identifies why the proposed Program would not conflict with the Coastal Act provisions contained in PRC Section 30214.

Nonetheless, Draft Program EIR Impact LUP-2 concludes the proposed Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA. The OHMVR Division also notes the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC. Refer to response to CCC Comments C2, C6, and C11 (see Section 4.3 of this Final Program EIR), response to Sierra Club Comment I3 (see Section 4.9 of this Final Program EIR), and response to Comments K5, K14, and K18 above for more information on this issue.

**Comment K88:** Friends of Oceano Dunes again states the proposed Dust Control Program violates PRC Section 30223 by permanently removing upland areas necessary to support coastal recreational uses.

*Response to Comment K88:* Refer to the response to Comment K73.

**Comment K89:** Friends of Oceano Dunes again states the proposed Dust Control Program violates PRC Section 30240 by creating 100 acres of additional vegetation that will serve as cover and vectors for increased predator activity and predation of listed species.

Response to Comment K89: Refer to the response to Comment K74.

**Comment K90:** Friends of Oceano Dunes again states the proposed Dust Control Program violates PRC Section 30240 by authorizing activities that are not depending on ESHA resources and would significantly disrupt habitat values.

*Response to Comment K90:* Refer to the response to Comment K74. In addition, as a point of clarification, the OHMVR Division is not proposing and does not have the authority to amend the SLO County LCP.

**Comment K91:** Friends of Oceano Dunes states the proposed Dust Control Program violates PRC Section 30251 by introducing wind fencing and other similar measures that are visually inconsistent with the natural dune environment, substantially impeding scenic and visual resources.

Response to Comment K91: Draft Program EIR Table 5-1 assesses the Dust Control Program's consistency with PRC Section 30251. Comment K91 does not provide specific evidence changing that analysis Additionally, Draft Program EIR Section 6.2 includes a text description and graphics depicting the existing scenic and visual resources setting of Oceano Dunes SVRA. As stated on page 6-4, "In addition to views of the ocean, beach, open sand areas, and vegetated dunes (i.e., landscapes and landforms), Pismo State Beach and Oceano Dunes SVRA are active recreation areas in which fishing, camping, streetlegal and OHVs, equestrian and other recreational activities regularly occur (i.e., cultural modifications). Visitor vehicles and campers may be brightly colored and have flags elevated above the vehicle (particularly parked campers); some campers also install wood or fencing around the camper to reduce sand blasting and erosion during high winds. Pismo State Beach and Oceano Dunes SVRA also include visitor-serving facilities such as marker posts, restrooms, garbage receptacles, and vendors; fencing that protects vegetation, biological and cultural resources, and generally defines where OHV activity is permitted. Furthermore, there are several ongoing and completed dust control activities at Oceano Dunes SVRA that contribute to the baseline scenic quality of the park, including brightly-colored, seasonal wind fencing at Grand Avenue, Pier Avenue, and Strand Way, dust and meteorological monitoring equipment (e.g. the S1 meteorological tower), and remnant straw bales from a 2014 seasonal dust control project."

Draft Program EIR Impact AES-1 evaluates the potential for the proposed Dust Control Program to impact the existing visual character and scenic qualities of Oceano Dunes SVRA and its surroundings. The discussion under Draft Program EIR Impact AES-1 specifically states, in part (page 6-21 to 6-22), "Vegetation and seasonal dust control measures would both occupy open sand areas; however, as shown in Figure 6-13 to Figure 6-15 (pages 6-24 to 6-26), the visual change resulting from vegetation would be less pronounced than that resulting from a seasonal array of fencing, straw bales, or other artificial materials . . . seasonal dust control measures such as wind fencing and straw

bales are not native or common to the natural dune landscape. . . the size, rectilinear design, and potential to contrast with natural dune landscape colors would make seasonal dust control measures a noticeable and distinct change to the visual character and quality of Oceano Dunes SVRA and its surroundings, much more so than Dust Control Program vegetation. But noticeable and distinct objects or landscape features do not necessarily imply significant and adverse impacts to the visual character and quality of an area or landscape. Factors such as the individual visitor's visual context and sensitivity to materials such as fencing, straw bales, etc., the ability of the visitor to still enjoy unmodified views, and whether the potential change would be temporary or permanent influence whether a noticeable and distinct visual change is substantial and adverse. Park visitors may or may not be highly sensitive to the visual change resulting from the deployment of seasonal dust control measures such as wind fencing and straw bales. While it is not possible to know each individual visitor's sensitivity to such objects and features, the general visual context in which the typical visitor would view these objects and features may be considered . . ."

The Draft Program EIR then proceeds to discuss a visitor's potential visual context and sensitivity to seasonal dust control measures, but concludes (page 6-23). "Regardless of whether the individual visitor is sensitive or indifferent to seasonal dust control measures being deployed on the dunes, the seasonal dust control measures would occupy a small part of the overall landscape and would not obstruct or detract from the landscape as a whole . . . the proposed seasonal dust control measures, though noticeable and distinct, would not constitute a substantial and adverse change to the visual character and quality of Oceano Dunes SVRA and its surroundings for park visitors."

Thus, the Draft Program EIR adequately evaluated the potential aesthetic impact of wind fencing and other similar measures and provides a fact-based justification for why this impact would be less than significant. See also response to Peterson Team Realty Comment F3 in Section 4.6 of this Final Program EIR.

**Comment K92:** Friends of Oceano Dunes again states the proposed Dust Control Program violates PRC Section 30255 by supplanting coastal dependent uses with 100 acres of vegetation where those uses currently exist.

*Response to Comment K92:* Refer to the response to Comment K27, K43, and K72. Refer also to the response to CCC Comment C12 (see Section 4.3 of this Final Program EIR) for more information on this issue.

**Comment K93:** Friends of Oceano Dunes states the proposed Dust Control Program is inconsistent with the Oceano County Airport Land Use Plan (ALUP).

Response to Comment K93: Comment noted. Friends of Oceano Dunes does not provide any specific reason or evidence for this assertion that the OHMVR Division can respond to at this time. Refer also to the response to Comment K94 below for more information on this issue.

**Comment K94:** Friends of Oceano Dunes states the OHMVR Division has violated the Oceano County ALUP by failing to submit the proposed Dust Control Program to the Airport Land Use Commission (ALUC) for a consistency determination.

Response to Comment K94: The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 5.1.3, which describes the ALUP policy referenced by Friends of Oceano Dunes (Policy G-1) and states (page 5-12, emphasis added), "In

regards to Policy G-1, the Oceano County ALUP identifies that no entity other than an ALUC is empowered by state law to make a determination of consistency with respect to an adopted ALUP, but that the review of individual development projects such as the proposed Dust Control Program is not a responsibility mandated to the ALUC when such projects do not require adoption or amendment of a general plan, zoning ordinance, etc." Thus, while it may be common and /or historical practice for proposed, individual development projects within Oceano County Airport Planning Areas to be subject to review by the ALUC, there is no requirement to do so. The OHMVR Division, therefore, has not violated the Oceano County ALUP.

**Comment K95:** Friends of Oceano Dunes notes the OHMVR Division is negotiating a Habitat Conservation Plan (HCP) for Oceano Dunes SVRA and states the Draft Program EIR should discuss the potential requirements of the HCP that may interact with the proposed Dust Control Program.

Response to Comment K95: The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 7.3, which states, "The Dust Control Program does not have the potential to conflict with the provisions of an adopted Habitat Conservation Plan. Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan because no such plan is in effect that covers the Dust Control Program area. An HCP that would cover the Oceano Dunes SVRA and Pismo State Beach is currently being prepared, but has not yet been published. The proposed Dust Control Program would be a Covered Activity under the HCP and is not expected to conflict with the provisions of the HCP, once it is approved." As of the time of publishing this Final Program EIR (March 2017), there is no draft HCP available for public review. A discussion of potential policies in this future plan, therefore, would be purely speculative and have no bearing on the setting or impact discussions presented in the Draft Program EIR. Furthermore, the future HCP would be subject to a separate, independent review pursuant to CEQA, as well as the National Environmental Policy Act, which would include an evaluation of all covered HCP activities, including activities related to the proposed Dust Control Program.

**Comment K96:** Friends of Oceano Dunes again states the OHMVR Division is required to amend the SVRA's General Development Plan and Resource Management Plan.

Response to Comment K96: Refer to the response to Comment K13.

**Comment K97:** Friends of Oceano Dunes again states the proposed Dust Control Program is not consistent with the Coastal Act and cannot be approved by the CCC.

Response to Comment K97: Refer to the response to Comments K5, K14, K24, K27, K43, K66, K72, K74, K77, K79, K81, and K86 through K92 above.

**Comment K98:** Friends of Oceano Dunes again states the OHMVR Division and Draft Program EIR have made incorrect conclusions regarding the proposed Dust Control Program's consistency with the Coastal Act and the Oceano County ALUP.

*Response to Comment K97:* Refer to the response to CCC Comments C2, C6, and C11 (see Section 4.3 of this Final Program EIR), response to SLOAPCD Comment D11 (see Section 4.4 of this Final Program EIR), response to Sierra Club Comment I3 (see Section 4.9 of this Final Program EIR), and response to Comments K14, K93, and K94 above.

**Comment K99:** Friends of Oceano Dunes states that the OHMVR Division's proposal to use green wind fencing is insufficient to make such fencing visually compatible with the visual

character of the surrounding area as required by PRC Section 30251. In addition, Friends of Oceano Dunes notes CCC staff rejected "in discussions" much less visually intrusive fencing for a hotel resort project in Sand City, California.

Response to Comment K99: First, as explained in the response to Comment K91, the Draft Program EIR adequately evaluates the potential aesthetic impact of wind fencing and other similar measures and provides a fact-based justification for why this impact would be less than significant. In addition, Draft Program EIR page 6-21 states, "Thus, a brightly-colored, large seasonal dust control array (such as orange wind fencing) against the dune landscape is presumed to be at least partially visible to most visitors from most areas of the SVRA for approximately seven months out of the year (March 1 to September 30). Even green- or neutral-colored fencing would be visible from close proximity (see Figure 6-15), although green-colored fencing would better integrate with landscape level views of Oceano Dunes SVRA (see Figure 6-20)." Thus, as a point of clarification, the Draft Program EIR concludes the potential visual impact from wind fencing would be less than significant regardless of whether orange or green fencing is used (see discussion under Draft Program EIR Impact AES-1). In other words, the Draft Program EIR does not require the use of green fencing to make the use of potential wind fencing visually compatible with the visual character and quality of Oceano Dunes SVRA.

Second, Friends of Oceano Dunes does not provide a specific document or citation for the CCC staff discussions referenced in Comment K99 for the OHMVR Division to consider, and it is speculative to state what CCC staff "would never" approve. Nonetheless, for information purposes, the OHMVR Division notes it conducted a general internet search for hotel projects in Sand City, California, which identified a CCC staff report and CDP Application (A-3-SNC-98-114) for the Monterey Bay Shores Resort in Sand City, California (CCC 2014). Presuming this is the project referenced in Comment K99, this is not a meaningful comparison to the proposed Dust Control Program. The Monterey Bay Shores Resort project involved a multi-story hotel resort with active grading and re-contouring of dune habitat near an officially designated State Scenic Highway (State Route 1). In addition, any discussion regarding the Monterey Bay Shores Resort would have occurred in the context of the jurisdiction- and geographic-specific LCP policies against which the project was evaluated (the City of Sand City LCP). The proposed Dust Control Program involves a different type of development entirely, in a different area, and is not subject to LCP policies.

**Comment K100:** Friends of Oceano Dunes states the Draft Program EIR's visual quality analysis is inadequate because it provides only a handful of viewpoints for the Program area. Friends of Oceano Dunes also notes the CCC has, for other projects, required substantially more viewpoints, and that the OHMVR Division should prepare viewpoint analysis for 60 to 120 viewpoints.

Response to Comment K100: Comment K100 purports that the Draft Program EIR's visual resource analysis is inadequate solely because the CCC has required more view points for other projects. The CCC, in its comments on the Draft Program EIR, did not comment on the Draft Program EIR's visual resource analysis or the number of viewpoints identified in the Draft Program EIR. Furthermore, Comment K100 does not provide a reason or evidence specific to the Draft Program EIR explaining why the EIR's visual resource analysis is inadequate, nor does it suggest any specific viewpoint for additional consideration. Therefore, no further response is necessary at this time. Refer

also to the OHVMR Division's response to Comment K91 above and Comments K101 and 102 below for additional information on this issue.

Comment K101: Friends of Oceano Dunes states Draft Program EIR Figures 6-10 to 6-13 show that the proposed Dust Control Program's seasonal dust control measures would have a substantial visual impact. Friends of Oceano Dunes also states it is inappropriate to "speculate without substantial evidence" whether visitors may or may not be sensitive to visual changes at Oceano Dunes SVRA. Finally, Friends of Oceano Dunes states Draft Program EIR Figure 6-14 "makes clear" how expanded vegetation would provide protection to predators.

Response to Comment K101: Comment K101 asserts Draft Program EIR Figures 6-10 to 6-13 "show" the proposed Dust Control Program would have a substantial visual impact, but does not provide a reason or evidence specific to the Draft Program EIR explaining why the change shown on these figures is substantial nor significant and adverse. In contrast, Draft Program EIR Chapter 6 provides a detailed regulatory and environmental setting, complete with a description of the scenic quality and sensitivity of the Program area and surroundings and accompanying graphics, as well as an objective, fact-based analysis of the proposed Program's potential visual impact, complete with visual simulations for sensitive receptor points. As part of this analysis, the Draft Program EIR indicates some components of the proposed Dust Control Program would be noticeable and distinct, but not represent a substantial adverse change to the visual character and quality of the site. Thus, the Draft Program EIR has adequately evaluated the potential aesthetic impact of wind fencing and other similar measures and provided a fact-based justification for why this impact would be less than significant. Refer also to the response to Comment K91 for additional information on this issue.

The OHMVR Division has not speculated on whether or not visitors would be sensitive to the visual change resulting from the proposed Dust Control Program. The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 3.2.1, which summarizes written comments received on the Revised NOP prepared for the Draft Program EIR and notes that commenters expressed a concern for a less intrusive approach to dust control, particularly as it related to diminished aesthetics for OHV riders. In addition, aesthetic appeal is generally a subjective determination made by the individual view, and Draft Program EIR page 6-4 describes factors that affect the public's sensitivity or concern for the scenic qualities of an area that are based on the U.S. Bureau of Land Management's Visual Resource Inventory Manual. Accordingly, the discussion under Draft Program EIR Section 6.4.3 describes the factors that the OHMVR Division considered when evaluating the proposed Program's potential visual impacts. Specifically, Draft Program EIR page 6-21 states, "The size, rectilinear design, and potential to contrast with natural dune landscape colors would make seasonal dust control measures a noticeable and distinct change to the visual character and quality of Oceano Dunes SVRA and its surroundings, much more so than Dust Control Program vegetation. But noticeable and distinct objects or landscape features do not necessarily imply significant and adverse impacts to the visual character and quality of an area or landscape. Factors such as the individual visitor's visual context and sensitivity to materials such as fencing, straw bales, etc., the ability of the visitor to still enjoy unmodified views, and whether the potential change would be temporary or permanent influence whether a noticeable and distinct visual change is substantial and adverse."

Furthermore, the Draft Program EIR is clear that the individual sensitivity of a viewer was not the determinate factor in determining whether the visual change resulting from

the proposed Program significant. For example, the discussion under Draft Program EIR Impact AES-1 states, in various places, "Park visitors may or may not be highly sensitive to the visual change resulting from the deployment of seasonal dust control measures such as wind fencing and straw bales. While it is not possible to know each individual visitor's sensitivity to such objects and features, the general visual context in which the typical visitor would view these objects and features may be considered (page 6-22) . . . although it is not possible to know the individual sensitivity of each individual receptor, the visual context in which the proposed seasonal dust control measures would be located is considered to lower the typical viewer's sensitivity somewhat, although it is possible the opposite may be true for some individual viewers (page 6-23) . . . Regardless of whether the individual visitor is sensitive or indifferent to seasonal dust control measures being deployed on the dunes, the seasonal dust control measures would occupy a small part of the overall landscape and would not obstruct or detract from the landscape as a whole (page 6-23." Thus, the visual context of the project, the remaining ability to take in unobstructed views of dune landscapes, and the temporary nature of the proposed Program's seasonal dust control measures were the key factors in the Draft Program EIR's finding of significance.

Finally, as explained in the response to Comment K65 above, the proposed Program would not increase predation of western snowy plover and California least tern.

Comment K102: Friends of Oceano Dunes again states that coloring the artificial wind fencing does not remedy the significant impact to visual resources such that it complies with the Coastal Act.

Response to Comment K102: Refer to the response to Comment K99.

**Comment K103:** Friends of Oceano Dunes states the Draft Program EIR fails to specify which fully protected species may be adversely affected by the proposed Dust Control Program.

Response to Comment K103: Friends of Oceano Dunes is mistaken. The OHMVR Division directs Friends of Oceano Dunes to updated EIR Appendix B, which provides a list of all special-status species with potential to occur in the Program area and their associated listing status. This table eliminates some fully protected species (e.g., bald eagle) from the analysis because they are unlikely to occur in the proposed Program area. See response to Comment K64 regarding impacts to California brown pelican. In addition, the OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 7.2.2.2, which describes special-status wildlife species, including fully protected species such as the white-tailed kite and California least tern, that are known to be present or have a moderate to high potential to occur in the proposed Program area and thus may be affected by the project. This section states that although white-tailed kite is present (foraging) in the Program area, it is not likely to nest in the Program area. As a result, no significant impacts to white-tailed kite are expected to occur. Impacts to California least tern are discussed in Draft Program EIR Impact BIO-2, as revised by Section 3.7 of this Final Program EIR, and the Draft Program EIR incorporates requirements to minimize and/or avoid impacts to nesting and special-status birds, including the fully protected California least tern (see Draft Program EIR Section 7.3.2, as revised by Section 3.7 of this Final Program EIR).

Comment K104: Friends of Oceano Dunes states: 1) the Draft Program EIR does not indicate if the OHMVR Division consulted with the USACE regarding the proposed Dust Control Program or conducted any wetland delineation for the proposed Program; 2) the Draft Program EIR fails

to provide adequate information regarding whether there are wetlands in the proposed Program area; 3) the OHMVR Division cannot conclude the proposed Program will not affect wetland resources or require a Section 404 permit or review under the National Environmental Policy Act (NEPA); 4) the proposed Program requires a consistency determination with the Coastal Zone Management Act; 5) the proposed Program does not appear to comply with PRC Section 30233(a) because it will result in discharge of fill to wetlands; 6) the CCC requires wetland buffers up to 200 feet; and 7) the Draft Program EIR fails to consider the impact of drought on the OHMVR Division's ability to identity present day wetlands.

Response to Comment K104: First, as a point of clarification, the OHMVR Division did not consult with the USACE or conduct a wetland delineation because the proposed Program activities are not anticipated to result in impact to federally-protected wetlands (see Draft Program EIR Section 7.3.4).

Second, Draft Program EIR Section 7.2.1.3 and Figure 7-1 textually and graphically depict the location and type of wetlands present within the proposed Program area. Thus, the Draft Program EIR does provide adequate information regarding potential wetlands in the proposed Program area. In addition, as explained in the response to Comment K35, the OHMVR Division has revised Draft Program EIR Figure 2-4 to show areas that have the potential to be considered wetland habitat at a larger scale (see Chapter 3 of this Final Program EIR).

Third, Draft Program EIR Section 7.1.5.1 explains that a Federal Clean Water Act Section 404 permit is required by the USACE if a project would place any dredged or fill material below the ordinary high water mark or mean high tide line of any water of the U.S. But, as explained in Draft Program EIR Section 7.3.4, the OHMVR Division is not proposing to place any dredged or fill material below the ordinary high water mark or mean high tide line of waters of the U.S. Therefore, the proposed Program would not require a Section 404 permit or NEPA review by the USACE.

Fourth, the proposed Program does not require a consistency determination with the Federal Coastal Zone Management Act because it does not involve actions undertaken or permitted by a federal agency.

Fifth, the proposed Dust Control Program would not dike, fill, or dredge open coastal waters, wetlands, estuaries, or lakes and thus would not conflict with PRC Section 30233(a). Furthermore, Draft Program EIR Section 7.3.2, as revised by this Final EIR (see Section 3.7), and Draft Program EIR Section 9.3.2 describes the requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on potential jurisdictional waters in areas where they are present. As part of these requirements, the OHMVR Division would establish a 150-foot setback from wetlands and other jurisdictional waters for all Program components. Accordingly, the Draft Program EIR evaluates the proposed Dust Control Program's potential impacts on regulated waters, including changes in water quality, in Impacts BIO-3 and HYD-1 and finds these impacts to be less than significant.

Sixth, Friends of Oceano Dunes does not provide a specific CCC policy mandating a 200-foot wetlands buffer. The California Coastal Act regulates impacts to wetlands within the coastal zone and recommends a minimum buffer width of 100 feet around wetlands. The Draft Program EIR's wetland habitat requirement establishes a 150-foot setback from wetlands and other jurisdictional waters, which is consistent with the Coastal Act.

Finally, as explained in the response to Comment K39 above, the Draft Program EIR identifies current drought conditions in SLO County. While these drought conditions may hinder the identification of present day wetlands, this is unlikely the case within the proposed Program area, which consists primarily of well drained, upland sandy soils that do not support large wetlands. In addition, the OHMVR Division's management of Oceano Dunes SVRA predates the current drought conditions, and staff are not aware of any local wetland or water feature within the identified Program area disappearing due to the recent drought conditions.

Comment K105: Friends of Oceano Dunes states the Draft Program EIR conflicts with the USFWS' finding that critical habitat Unit 1 for La Graciosa thistle, which lies within Oceano Dunes SVRA, is occupied.

Response to comment K105: The Draft Program EIR does not conflict with the USFWS finding that La Graciosa thistle is still extant at several locations throughout its range. Draft Program EIR page 7-10, states, "There is approximately 300 acres of La Graciosa thistle critical habitat within the Dust Control Program area. Since federal listing, populations of this species have severely declined. At the time of listing there were 11 extant occurrences distributed among 7 populations. Currently, La Graciosa thistle is considered to be extant at seven occurrences that are distributed among four populations (USFWS 2008). There is suitable dune habitat within the Program area but this species is not known to occur within the Program area. It was recently observed nearby approximately two miles southeast of Oso Flaco Lake during CDPR surveys (CDPR 2015a), and has a moderate potential to occur in the Program area."

**Comment K106:** Friends of Oceano Dunes states La Graciosa thistle is listed as threatened by the state of California and that killing or possessing the plant is prohibited by the California Endangered Species Act.

Response to Comment K106: This comment is consistent with the information presented in the Draft Program EIR. The OHMVR Division directs Friends of Oceano Dunes to the description of La Graciosa thistle on Draft Program EIR page 7-10, which identifies this species is federal and state listed as threatened. The OHMVR Division also directs Friends of Oceano Dunes to the discussion under Draft Program EIR Impact BIO-1, as revised by Section 3.7 of this Final Program EIR, which identifies that the OHMVR Division is not proposing to nor anticipating that the proposed Dust Control Program would impact listed plant species. Finally, as explained in more detail in the response to Comments K56 and 57 above, the OHMVR Division has incorporated requirements into the proposed Dust Control Program that would avoid and/or minimize potential adverse impacts on special-status plants and ensure the proposed Program complies with the California Endangered Species Act.

**Comment K107:** Friends of Oceano Dunes again states the Draft Program EIR fails to adequately disclose, analyze and address the impact of predation on the western snowy plover and California least tern.

*Response to Comment K107:* Refer to the response to Comment K65.

**Comment K108:** Friends of Oceano Dunes again states the Draft Program EIR does not contain the appropriate level of analysis of predators and predation on the western snowy plover and California least tern, specifically predation by red foxes, coyotes, skunk, and opossum.

*Response to Comment K108:* Refer to the response to Comment K65.

**Comment K109:** Friends of Oceano Dunes states the OHMVR Division has created standard project requirements that would appear to apply to projects within the State Parks system generally, making them illegal underground regulations.

Response to Comment K109: Comment noted. As explained in more detail in response to Comments 52 and 53 above, the Standard and Specific Project Requirements the OHMVR Division has incorporated into the proposed Program to minimize and avoid potential adverse impacts apply to the proposed Dust Control Program activities only. They are not relevant to any law or procedure of law enforced or administered by the OHMVR Division and as such are not subject to the California Administrative Procedure Act, nor or they illegal underground regulations.

**Comment K110:** Friends of Oceano Dunes states the Draft Program EIR does not define the phrase "maximum extent feasible," fails to explain how the OHMVR Division can disturb and occupy as little land as possible in light of Rule 1001 requirements, and "ensures" that disturbed areas within critical habitat will be restored to their original condition.

Response to Comment K110: First, as explained in the response to Comment K25, the term "maximum extent feasible" is used within the context of CEQA and the state CEQA guidelines and means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Second, Friends of Oceano Dunes misinterprets the Draft Program EIR. As explained in the response to Comment K54 above, the OHMVR Division would disturb and occupy as little land as possible by identifying the minimum area required to complete planned work activities, designating this minimum area, using existing paths of travel to access work areas, and restoring all disturbed areas to the maximum extent feasible; however, this requirement does not limit proposed dust control measures nor preclude compliance with Rule 1001. In addition, the only critical habitat that would potentially be affected is La Graciosa thistle; however, Program components avoid La Graciosa thistle wetland habitat, and Standard and Specific Project Requirements incorporated into the Program discussed in Section 7.3.3 render any impact less than significant.

**Comment K111:** Friends of Oceano Dunes states since there is the potential for tree planting to be included in the proposed Dust Control Program the OHMVR Division and the CCC should invite landowners to be project applicants.

Response to Comment K110: Comment noted. As explained in more detail in the response to Comment K6 and K24 above, the OHMVR Division has not initiated discussions with any private landowners yet; however, the annual review process described in Draft Program EIR Section 2.4.1, as revised by Section 3.3 of this Final Program EIR, includes a requirement for the OHMVR Division to secure authorization prior to planting vegetation on lands not operated by the state. In addition, matters pertaining to the CCC's administrative authority and procedures for processing a CDP application are outside the scope of the OHMVR Division's CEQA review of the proposed Dust Control Program.

**Comment K112:** Friends of Oceano Dunes states Draft Program EIR Section 8.2.4 describes the proposed Dust Control Program area as 985 acres which is inconsistent with other parts of the EIR that identify the proposed Program area as 690 acres.

Response to Comment K112: Friends of Oceano Dunes is mistaken. Footnote 16 in Draft Program EIR Section 8.2.4 (page 8-11) states, "The 985-acre area includes the primary 690-acre Program area where most activities would occur and the 295-acre potential tree planting area." This description is consistent with description of the proposed Program area in Draft Program EIR Section 2.3.1. Refer also to the response to Comment K2 above.

**Comment K113:** Friends of Oceano Dunes cites Draft Program EIR page 9-9, which concludes the OHMVR Division is not proposing to place fill in regulated waters, and notes that since the proposed Program area "may yet expand due to tree planting" the Draft Program EIR has no reasonable basis to conclude that fill would never be placed in a wetland.

Response to Comment K113: Draft Program EIR Section 7.2.1.3 discusses wetlands in and near the proposed Program Area, and native wetland alliance vegetation communities are depicted on Draft Program EIR Figure 7-1. As explained in the response to Comment K35, the OHMVR Division has revised Draft Program EIR Figure 2-4 to show areas that have the potential to be considered wetland habitat (see Chapter 3 of this Final Program EIR), including within the potential tree planting area. Furthermore, Draft Program EIR Section 7.3.2, as revised by this Final EIR (see Section 3.7), and Draft Program EIR Section 9.3.2 describes the requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on potential jurisdictional waters in areas where they are present. As part of these requirements, the OHMVR Division would establish a 150-foot setback from wetlands and other jurisdictional waters for all Program components. Accordingly, the Draft Program EIR evaluates the proposed Dust Control Program' potential impacts on regulated waters, including changes in water quality, in Impacts BIO-3 and HYD-1 and finds these impacts to be less than significant. Friends of Oceano Dunes does not provide specific evidence to the contrary that the OHMVR Division can address at this time. Refer also to the response to CDFW Comment B7 (see Section 4.2 of this Final Program EIR) and Comments K35, K61, and K104 above.

Comment K114: Friends of Oceano Dunes summarizes the CDFW comment letter submitted on the Revised NOP the OHMVR Division prepared for the Draft Program EIR and states CDFW has failed in its responsibilities as a Trustee Agency, including by failing to protect La Graciosa thistle and brown pelican, and exceeded its jurisdictional authority. Friends of Oceano Dunes also states CDFW has no standing or authority regarding the proposed Dust Control Program because it is something "that has nothing to do with biological resources and has no impact on biological resources."

Response to Comment K114: Comment noted. First, speculation on the intent of CDFW's comment letter and its role as a Trustee Agency is outside the scope of the Draft Program EIR. Second, as explained in the OHMVR Divisions response to CDFW Comment B10 (see Section 4.2 of this Final Program EIR) and Comments K64, K103, K105, K106, K110 above, the Draft Program EIR does provide an adequate level of information and analyses regarding potential impacts on La Graciosa thistle and the California brown pelican. Finally, Friends of Oceano Dunes' statement that the proposed Program would not have a significant impact on biological resources is consistent with the findings of the Draft Program EIR.

Comment K115: Friends of Oceano Dunes states the CCC is in agreement with Friends of Oceano Dunes that the Draft Program EIR failed to develop or consider a full range of potential project alternatives.

Response to Comment K115: Comment 115 does not provide or suggest any reason why the Draft Program EIR's alternatives analysis in inadequate nor suggest any specific additional alternatives for the OHMVR Division to consider. Nonetheless, for information purposes, as explained in the response to CCC Comments C6 and C7 (see 4.3) of this Final Program EIR), Draft Program EIR Chapter 12 includes a robust evaluation of alternatives to the proposed Program, consistent with the requirements of CEOA and the CEQA Guidelines. Section 12.1 of the Draft Program EIR provides information on how the OHMVR Division selected alternatives for consideration and evaluation in the Draft Program EIR. Section 12.2 identifies alternatives considered but rejected and, as required by CEQA, provides a brief explanation of why the alternative was rejected from further consideration. Section 12.3 of the Draft Program EIR considers two different versions of the "No Project Alternative" required by CEQA. In addition, the Draft EIR evaluated the following alternatives: a different dust control program location (Draft Program EIR Section 12.2.1); an accelerated Dust Control Program schedule (Draft Program EIR Section 12.2.2); OHV use restrictions (Draft Program EIR Sections 12.2.3.1 and 12.2.3.2); off-site residential filtration systems (Draft Program EIR Sections 12.2.4.1 and 12.2.4.2); two versions of the No Project Alternative (Draft Program EIR Sections 12.3.1 and 12.3.2); and, an alternate dust control program recommended by the SLOAPCD (Draft Program EIR Section 12.3.4). Finally, as shown in Section 3.8 of this Final Program EIR, the OHMVR Division has added an evaluation of artificial wind breaks as an alternative to the proposed Program that concludes the use of wind breaks reduce (but not substantially lessen) the proposed Program's significant recreation impacts while resulting in new, significant and unavoidable aesthetic and biological resources impacts.

**Comment K116:** Friends of Oceano Dunes states Draft Program EIR page 7-14 identifies that USFWS-designated critical habitat for western snowy plover extends 1,300 feet inland. Friends of Oceano Dunes notes the Draft Program EIR states, at various points, that the proposed Program area is set back between 1,000 and 1,500 feet inland, which strongly suggests that there area locations where the proposed Program Area extends into critical habitat.

Response to Comment K116: The OHMVR Division directs Friends of Oceano Dunes to Chapter 3 of this Final Program EIR, which contains new Figure 7-2 that graphically depicts the proposed Program area and western snowy plover critical habitat at a larger scale. As explained in more detail in response to Comment K3, the location of the western snowy plover critical habitat area depicted on Draft Program EIR Figure 2-5 and new Figure 7-2 consists of GIS data provided by the USFWS via its critical habitat portal (USFWS 2012, 2016). This data indicates the critical habitat area extends approximately 1,100 feet inland from the Pismo State Beach western boundary and borders the northern extent of the proposed Dust Control Program area (between marker posts 4 and 5), but is approximately 240 feet west of the southern extent of the proposed Program area (near marker post 7). Thus, the proposed Dust Control Program area borders, but does not overlap with or otherwise include, USFWS-designated critical habitat for western snowy plover. Refer also to the response to Comments K3, K30, K32, K35, K40, K41, and K65 for additional information on this issue.

**Comment K117:** Friends of Oceano Dunes states that Draft Program EIR page 7-5 is misleading because it identifies that the proposedDust Control Program's western boundary is set back between 1,000 and 1,500 feet from the Pacific Ocean to avoid western snowy plover critical

habitat. Friends of Oceano Dunes notes the Pacific Ocean is not the boundary for the critical habitat, which reaches "very far inland."

Response to comment K117: As explained in more detail in response to Comment K3, the location of the western snowy plover critical habitat area depicted on Draft Program EIR Figure 2-5 and new Figure 7-2 (see Chapter 3 of this Final Program EIR) consists of GIS data provided by the USFWS via its critical habitat portal (USFWS 2012, 2016). This data indicates the critical habitat area extends approximately 1,100 feet inland from the Pismo State Beach western boundary and borders the northern extent of the proposed Dust Control Program area (between marker posts 4 and 5), but is approximately 240 feet west of the southern extent of the proposed Program area (near marker post 7). Thus, the proposed Dust Control Program area borders, but does not overlap with or otherwise include, USFWS-designated critical habitat for western snowy plover. Refer also to the response to Comments K3, K30, K32, K35, K40, K41, and K65 for additional information on this issue.

**Comment K118:** Friends of Oceano Dunes states the Draft Program EIR does not evaluate how adding 100 acres of vegetation would affect emergency access for first responders and notes the proposed Program violates PRC Section 5090.03 (c) by establishing a natural preserve or wilderness area within Oceano Dunes SVRA.

Response to Comment K118: Draft Program EIR Mitigation Measure REC-1 requires the OHMVR Division to plant vegetation and deploy seasonal dust control measures in a manner that does not interfere with established paths of travel, which as described in the response to Comment K8 above, includes emergency response vehicle routes located inside Oceano Dunes SVRA. In addition, presuming Friends of Oceano Dunes is referring to PRC 5090.43(c), the OHMVR Division notes cultural preserves, natural preserves, and wilderness areas are officially designated units of the State Parks system. The proposed Program does not include the establishment of such a State Park unit and thus does not conflict with PRC Section 5090.43(c).

**Comment K119:** Friends of Oceano Dunes asserts that the Dust Control Program violates PRC Section 5019.62 by including new improvements within the SVRA that do not directly enhance the public enjoyment of the natural scenic cultural, ecologic values of the seashore.

Response to K119: PRC Section 5019.62 specifies that improvements undertaken within the state seashore shall be for the purpose of making the areas available for public enjoyment, recreation, and education in a manner consistent with the perpetuation of their natural, scenic, cultural, ecological, and recreational value. The code specifies that improvements that do not directly enhance these values shall not be undertaken.

The proposed Dust Control Program does not conflict with PRC Section 5019.62. While the proposed Program activities would limit and interfere with coastal vehicular recreational opportunities at Oceano Dunes SVRA, the Draft Program EIR states (page 2-20), "newly planted vegetation would primarily enhance areas where vegetation already exists (e.g., adjacent to an existing vegetation island)" and (page 7-25) "The planting of 100 acres of native dune vegetation could result in a beneficial impact to the unique Guadalupe Nipomo Dunes Complex." In addition, this newly planted vegetation would also provide non-motorized recreational opportunities.

Furthermore, Mitigation Measure REC-1 requires the OHMVR Division to integrate recreation opportunities into the proposed dust control measures by: 1) providing

educational kiosks that provide information on dune (i.e., seashore) ecosystems; 2) establishing and maintaining motorized and non-motorized trails through large, continuous blocks of planted vegetation; and 3) embedding OHV training or vendor areas within large dust control projects. The proposed Program would also minimize and avoid potential impacts to biological and cultural resources.

Thus, for the reasons outlined above, the proposed Program activities would provide for and enhance various portions of the natural, scenic, cultural, ecological, and recreational values present at Oceano Dunes SVRA, Pismo State Beach, and the San Luis Obispo State Seashore.

**Comment K120:** Friends of Oceano Dunes states that the proposed Dust Control Program violates PRC Section 5090.02(c) by failing to expand OHV recreational activity at Oceano Dunes SVRA.

Response to K120: PRC Section 5090.02 generally sets forth legislative findings, declarations and intent for OHV recreation. The section referenced by Comment K120 sets forth that it is the intent of the Legislature that existing off-highway motor vehicle recreational areas, facilities, and opportunities should be expanded and managed in a manner consistent with the full provisions of the Off-Highway Motor Vehicle Recreation Act. Addressing potential off-site effects such as particulate emissions is consistent with the Legislative intent expressed in PRC Section 5090.02(c)(1) that existing OHV areas be managed in a manner that sustains long-term use. The OHMVR Division notes that, per PRC Section 5090.02(c)(3), the Legislature has found that off-highway recreation includes both motorized recreation and motorized off-highway access to nonmotorized recreation activities, such as exploring a vegetation island. In addition, PRC Section 5035 lists management priorities for SVRA, including protection of public safety and the appropriate utilization and conservation of lands. While the proposed Dust Control Program would result in a significant and unavoidable impact on coastal OHV recreational opportunities at Oceano Dunes SVRA, it would not violate PRC Section 5090.02(c).

**Comment K121:** Friends of Oceano Dunes again states the proposed Dust Control Program violates the Coastal Act and applicable LCPs, and that the OHMVR Division should consider the content findings of applicable LCPs to promote efficiency and goodwill between agencies.

Response to comment K121: Refer to the response to Comments K5, K14, K24, K27, K43, K66, K72, K74, K77, K79, K81, and K86 through K92 above.

**Comment K122:** Friends of Oceano Dunes states the proposed Dust Control Program is inconsistent with SLO County LCP policies and standards, citing Policy 29 which protects terrestrial environmental in SLO County's coastal zone.

Response to comment K122: As explained in more detail in the response to Comment K66 above, the Draft Program EIR explains (page 5-1) the proposed Program is subject to a consolidated CDP process by which the CCC will act upon the OHMVR Division's CDP application. Under this process, the standard of review is Chapter 3, Coastal Resources Planning and Management Policies, of the Coastal Act, and not the applicable LCP (although the CCC may use the LCP as a guide when acting upon the CDP). Thus, there is no need for the OHMVR Division to consider the content and findings of the Grover Beach and SLO County LCPs in the Draft Program EIR. In addition, response to Comment K74 above describes that PRC Section 30240 protects ESHA from significant

disruption of habitat values, limits development within ESHA to only uses dependent on the ESHA resources, and limits development adjacent to ESHA to uses that are compatible with the continuance of the ESHA. Accordingly, Draft Program EIR Table 5-1 explains the OHMVR Division has incorporated requirements into the proposed Dust Control Program that protect against significant disruption of habitat values, such as avoiding special-status species habitat, and that the proposed activities are dependent on the resources present at Oceano Dunes SVRA.

**Comment K123:** Friends of Oceano Dunes states the proposed Dust Control Program violates and is inconsistent with the SLO County General Plan.

Response to comment K123: Comment K123 does not provide specific evidence identifying how the proposed Dust Control Program is inconsistent with the SLO County General Plan. Regardless, the OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR page 5-1, which states, "The proposed Dust Control Program would be located on state-owned and state-operated land that, with the exception of coastal development permitting usually conducted through local agencies, is not subject to local land use restrictions and zoning regulations." Thus, the SLO County General Plan is not applicable to the proposed Program.

**Comment K124:** Friends of Oceano Dunes states it has provided substantial new information and data that has led to new or greater impacts compared to what is described in the Draft Program EIR, as well as a new feasible alternative that would reduce impacts.

Response to comment K124: As explained in Section 1.2 of this Final Program EIR, CEQA Guidelines section 15088.5 sets forth that when significant new information is added to an EIR after public noticing of the Draft EIR, the EIR must be recirculated to give the public a meaningful opportunity for review. Significant new information is defined as 1) a new significant environmental impact, 2) a substantial increase in the severity of an environmental impact requiring new mitigation, or 3) a feasible project alternative or mitigation measure considerably different from those previously analyzed that would clearly reduce environmental impacts. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. As explained in the responses to the comments submitted by Friends of Oceano Dunes (Comments K1 to K136), the OHMVR Division has reviewed the materials submitted by Friends of Oceano Dunes and determined these materials do not significant new information that requires recirculation of the Draft Program EIR.

**Comment K125:** Friends of Oceano Dunes again states that CDFW has exceeded its authority as a reviewing agency under CEQA.

Response to Comment K125: Comment noted. Refer to the responses to State Clearinghouse Comment A2 (see Section 4.1 of this Final Program EIR), CDFW Comment B2 (see Section 4.2 of this Final Program EIR), and K114 above.

Comment K126: Friends of Oceano Dunes states the Draft Program EIR is internally inconsistent because it finds the proposed Dust Control Program could conflict with the Coastal Act but concludes the CCC might find the proposed Dust Control Program consistent with the Coastal Act.

Response to Comment K125: The Draft Program EIR is internally consistent regarding the proposed Dust Control Program's consistency with the Coastal Act. As explained in

the response to Comment C2, the OHMVR Division, acting as the CEQA Lead Agency, has determined the proposed Dust Control Program could result in a significant and unavoidable conflict with the Coastal Act because it does not maximize existing, historical, and traditional coastal OHV recreation opportunities at Oceano Dunes SVRA. Regardless of this CEQA determination, the OHMVR Division's CDP application and the proposed Program's consistency with the Coastal Act is ultimately subject to the jurisdiction and authority of the CCC. Accordingly, the Draft EIR also notes (page 5-18), "the CCC may determine the Dust Control Program, as described in this EIR, is consistent with the Coastal Act and/or impose additional conformance on the Program as necessary to support its issuance of a CDP and the Program's conformance with the Coastal Act." Refer also to the response to CCC Comments C6 and C11 (see Section 4.3 of this Final Program EIR), response to SLOAPCD Comment D11 (see Section 4.4 of this Final Program EIR) response to Sierra Club Comment I3 (see Section 4.9 of this Final Program EIR), and responses to Comments K14, K93, and K94 above for additional information on this issue.

**Comment K127:** Friends of Oceano Dunes requests that the OHMVR Division include as appendices all relevant plans and policies.

Response to Comment K127: Comment K127 does not provide context for its request. The Draft Program EIR was prepared using the general knowledge and expertise of the OHMVR Division and its consultants. The Draft Program EIR's regulatory setting section also lists and discusses the plans, regulations, statutes relevant to the proposed Dust Control Program. In addition, each Draft Program EIR Chapter includes a list of references and sources of information used to prepare the Draft Program EIR. As such, these are considered incorporated into the EIR by reference and do not need to be included separately as appendices.

**Comment K128:** Friends of Oceano Dunes states that the Draft Program EIR fails to propose mitigation that shows there will be no take of listed species.

Response to Comment K128: Comment K128 does not provide specific evidence explaining why the requirements the OHMVR Division has incorporated into the Draft Program EIR would not prevent take of listed species. Nonetheless, as explained in more detail in the response to CDFW Comments B4 and B5 (see Section 4.2 of this Final Program EIR), the Draft Program EIR includes detailed information on the biological resources present at and in the vicinity of the Program area, the regulations that govern these resources (including CESA and FESA), and the potential impacts associated with proposed Program activities. In addition, Draft Program EIR Section 7.3.2, as revised by this Final EIR, describes the standard and project specific requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts on potential biological resources that could be present in and near the Program area. These requirements include, but are not limited to, site-specific surveys for biological resources prior to implementing specific dust control activities. Furthermore, the annual review process involves reporting (to the CCC and appropriate wildlife agencies) on measures incorporated into the planned activities to avoid or minimize potential adverse impacts on sensitive biological resources. Thus, the proposed Program would not result in take of listed species.

**Comment K129:** Friends of Oceano Dunes states the provisions of PRC Section 30601 apply only to those cases where there is no certified LCP.

Response to Comment K129: As explained in more detail in the response to Comment K66 above, the Draft Program EIR explains (page 5-1) the OHMVR Division, SLO County, the City of Grover Beach, and the CCC have consented to a consolidated CDP process by which the CCC will act upon the OHMVR Division's CDP application.

**Comment K130:** Friends of Oceano Dunes requests the OHMVR Division provide a copy of the document that, pursuant to PRC Section 30601.5, provides the OHMVR Division with a legal right, interest, or other entitlement to the La Grande tract.

Response to Comment K130: As explained in the response to Comment K23 above, the OHMVR Division operates the part of the SVRA within the County's La Grande Tract under an existing operating agreement. This operating agreement provides the OHMVR Division with the authority to implement the proposed Dust Control Program.

Comment K131: Friends of Oceano Dunes states the Draft Program EIR does not contain a sufficient degree of analysis to provide decision makers the ability to intelligently consider the proposed Dust Control Program's environmental consequences.

*Response to Comment K131:* Comment noted. The Draft Program EIR was prepared in accordance with CEQA and the CEQA Guidelines. The OHMVR Division disagrees with Friends of Oceano Dunes and notes Comment K131 does not provide any specific evidence explaining why the Draft Program EIR lacks a sufficient degree of analysis.

**Comment K132:** Friends of Oceano Dunes states no set of terms and conditions could ensure the proposed Program would be in compliance with the Coastal Act.

Response to Comment K132: Comment noted. Matters pertaining to the CCC's administrative authority and procedures for processing and issuing a CDP are outside the scope of the OHMVR Division's CEQA review of the proposed Dust Control Program.

**Comment K133:** Friends of Oceano Dunes states the Draft Program EIR does not indicate whether it has notified the Federal Avian Administration (FAA) regarding the proposed meteorological monitoring equipment.

Response to Comment K133: Friends of Oceano Dunes is mistaken. The OHMVR Division directs Friends of Oceano Dunes to Draft Program EIR Section 5.1.3, which discusses the Oceano County ALUP, including policies related to FAA regulations. Friends of Oceano Dunes also directs Friends of Oceano Dunes to the discussion under Draft Program EIR Impact LUP-3, which states, "The proposed Dust Control Program would not significantly increase airport-related risks for park visitors or interfere with takeoff, landing, or maneuvering of pilots, nor would it exceed the height of any FAA civil airport surface." Since the proposed Program would not exceed any FAA civil airport surface areas, it would not require FAA notification.

**Comment K134:** Friends of Oceano Dunes states the Draft Program EIR does not discuss whether the monitoring equipment or the placement of towers requires Federal Communications Commission (FCC) approval or licensing.

Response to Comment K134: The proposed 10-meter meteorological towers would not require an FCC license because they are below the height (200 feet) needed to obtain a license from the FCC and the FAA and the week cellular data connection that would be used retrieve data from the meteorological monitoring equipment would not interfere with broadcast communications.

**Comment K135:** Friends of Oceano Dunes states the OHMVR Division has engaged in unlawful segmentation by dividing up the proposed Dust Control Program into separate annual subprojects.

Response to Comment K135: The OHMVR Division has not engaged in unlawful segmentation of the proposed Dust Control Program. As explained in Draft Program EIR Section 1.3, "the proposed Dust Control Program constitutes a series of related activities that would occur regularly, in approximately the same geographic area, and result in generally similar environmental effects that can be mitigated in similar ways. Thus, the OHMVR Division has determined a Program EIR is the appropriate type of EIR for the project." The OHMVR Division has properly planned and implemented previous dust control-related activities at Oceano Dunes SVRA, and the Draft Program EIR thoroughly describes and captures baseline environmental conditions to adequately evaluate the potential impacts of the proposed Dust Control Program on an individual and cumulative basis.

**Comment K136:** Friends of Oceano Dunes states noncompliance with law renders an EIR invalid. Friends of Oceano Dunes states the proposed Dust Control Program violates the Coastal Act, FESA, CESA, the SVRA Act, the SLO County General Plan and LCP, and the Oceano Dunes SVRA General Development Plan and Resource Management Plan.

Response to Comment K136: Comment K136 does not provide any specific evidence to support its claim that the proposed Dust Control Program violates the listed regulations, statutes, and plans. As explained in the responses to comments K1 to K135, the proposed Program activities would proceed in a manner consistent with all applicable laws, regulations, and plans, with the exception of the General Development Plan. Regarding the General Development Plan, see response to Comment K13.

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## NOTICE OF AVAILABILITY DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE OCEANO DUNES SVRA DUST CONTROL PROGRAM

TO:

County Clerks; State Clearinghouse; Responsible Agencies; Trustee Agencies; Federal Agencies with potential approval authority; Interested Parties

SUBJECT:

Notice of Availability of a Draft Program Environmental Impact Report (EIR) for the Oceano Dunes State Vehicular Recreation Area (SVRA) Dust Control Program, State Clearinghouse No. 2012121008

LEAD AGENCY:

California Department of Parks and Recreation (CDPR)
Off-Highway Motor Vehicle Recreation (OHMVR) Division
1725-23rd Street, Suite 200
Sacramento, CA 95816

5/200/ de 8-1-16

Contact: Ronnie Glick, Senior Environmental Scientist

Oceano Dunes District CDPR, OHMVR Division 340 James Way, Suite 270 Pismo Beach, CA 93449 (805) 773-7180

Notice is hereby given that the OHMVR Division has prepared a Draft Program EIR for the Program identified above and is requesting comments on the content of this Draft Program EIR.

PROJECT LOCATION: Southwest San Luis Obispo (SLO) County - Oceano Dunes SVRA

PROJECT DESCRIPTION: The OHMVR Division of CDPR proposes to implement a five-year program (Program) to control and minimize emissions of dust and particulate matter (PM) that are generated at Oceano Dunes SVRA during periods of strong, persistent winds and subsequently blown downwind of the SVRA and onto the Nipomo Mesa. Oceano Dunes SVRA is located in southwestern SLO County, approximately twelve miles south of the City of SLO, within the Coastal Zone established by the California Coastal Act. The SVRA borders and is contiguous with parts of Pismo State Beach. The two parks provide public access to beaches and other coastal recreation opportunities, including off-highway motor vehicle (OHV) recreation in certain designated areas. The OHMVR Division has applied for a Master Coastal Development Permit from the California Coastal Commission, Central Coast District, for the Program because it involves development in the Coastal Zone.

The OHMVR Division would accomplish this Program by planting vegetation and deploying seasonal dust control measures such as wind fencing (or equivalent control measures) at Oceano Dunes SVRA. Planting vegetation and deploying seasonal dust control measures would occur annually. The OHMVR Division would plant approximately 20 acres of native dune vegetation, and deploy approximately 40 acres of seasonal dust control measures per year for a period of five years (seasonal measures could be installed as early as March 1 and removed as tate as September 30). These activities would take place on approximately 690 acres of land within Oceano Dunes SVRA that are located upwind of the Nipomo Mesa. The SLO County Air Pollution Control District and OHMVR Division studies have identified this area as the area most likely area influencing air quality downwind of Oceano Dunes SVRA. Dust and meteorological monitoring to support these activities would occur as part of the Program. The OHMVR Division

Honorable Darrell Steinberg California State Senator

#### Dear Senator:

How is it that the Off Highway Vehicle (OHV) industry has such influence in Sacramento? We are told that the legislature supports this type of recreation, and has mandated that it take precedence over non motorized recreation on our public beach in Oceano. We are told that the legislature demands that it continue, even if the pollution from it threatens public health.

Perhaps the attached link to Oral History of Chappie will help clarify how the off highway vehicle industry got its grip. It tells what happened in Sacramento starting fifty years ago at the hand of assembly representative Eugene Chappie, known as "the father of the OHV" (The document can be advanced easily if you download it).

Chappie talks about his involvement with off-roaders and their industry and how his power, influence, and connections led to the diversion of the fuel tax ( S65 million dollars last year) to OHV (when it should be going to counties, cities, and for road maintenance). Surely this has to be the biggest coup to benefit corporate lobbyists in the California legislature's history, and the most regretable for the environment and local government budgets. Your Senate Bill 742 did nothing to curb this runaway give-away.

Chappie, who died at age 72, left us his oral history. At page 145 he begins to tell how he fed the OHV industry with bill after bill; and and at page 156 how thousands of dollars in cash gifts from the oil companies fed him.

Times have changed, hopefully. We must stop the off highway vehicle industry's fuel tax rip off that Chappie and the off highway vehicle industry (and the related oil industry) managed to get past the public fifty years ago. The funding should be stopped. The off highway vehicle industry (and not counties and cities) should pay for the places for their products to be used, and the consequences of that use.

A recent study by the San Luis Obispo Air Pollution Control District found that off roading on the Oceano Dunes State Vehicular Recreation causes health threatening concentrations of particulate matter to us in nearby neighborhoods. See the study at <u>slocleanair.org</u>.

For this and other impacts caused by the Chappie Z'berg law and your extension of it with SB 742, see our documentaries at <u>safebeachanddunes.org</u>.

Sincerely,

Nell Langford, Ph.D. P.O. Box 27 Pismo Beach, CA 93448 805 773 4771

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The beaches above The high tide market?

#### 4.12 RESPONSE TO COMMENTS FROM UNA SKADDEN

The OHMVR Division received two comments from Una Skadden. In general, these comments relayed information in the form of newspaper articles, correspondence with government officials regarding air pollution, and other documents pertaining to dust and air quality in communities downwind of Oceano Dunes SVRA.

Comment L1: Mrs. Skadden indicates she is transmitting information regarding existing air quality conditions, including the NOA for the Draft Program EIR for the Dust Control Program, letters to elected officials from herself, Nell Langford, Ph. D., Sunny Bode and articles from The Adobe Press and The Tribune. This information is generally from the years 2010 and 2011, although not all information submitted contains a date of publication, transmittal, etc.

Response to Comment L1: Comment L1 refers to existing conditions and does not raise any specific points on the Draft Program EIR's evaluation of the proposed Dust Control Program's potential environmental impacts. In addition, Comment L1 generally provides information that is consistent with that contained in the Draft Program EIR. The OHMVR Division directs the commenter to Draft Program EIR Section 1.1.1, which discusses saltation and dust generation at Oceano Dunes SVRA, and Section 1.1.3, which discusses the various dust and particulate matter studies that have been conducted at the site.

**Comment L2:** Mrs. Skadden reiterates she has transmitted information, states she is having health problems, and asks if the public owns the beaches above the high tide mark.

Response to Comment L1: Comment noted. The OHMVR Division appreciates the time Mrs. Skadden has taken to participate in dust control issues and to provide comments on the Draft Program EIR; however, Comment L2 does not provide a specific comment or raise any significant, new information regarding the contents and findings of the Draft Program EIR. As a point of clarification, the California Department of Parks and Recreation does hold certain lands at Pismo State Beach and Oceano Dunes SVRA above the high tide line in trust for all the people of the State of California; however, other agencies and property owners also have a public or private interest in lands above the high tide line, such as the SLO County.

ponses to Draft EIR Comments	Page 4
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# **COMMENT LETTER "M"**

Citizens For A Vehicle Free Nipomo Dunes



INSPIRATIONAL CHAIRMAN IEM MOMBON EXECUTIVE DESCRIPTION BILL DESCRIPTION

Anna Milwe Loe Cerber Seray Scheder Itye Setz ,, то орси Whitersy Michylenb Jay Валасто! Mare Barre Devic G. Bandoro, M. Mary Creig Bud Laurent E. Creig Cunninghem m. W.D. B.I Engele deen Crusen Poly Cooper Ransa Spenne Fred Bleeter Pog Pnand Ann Hydek Xenneth Heggard Patri Maletenn Orve: Claborne Bruce Raisy Arica Hurley Sandy Bohweger Careta MuNicen Anică Judo Standar D. Adm Dick Colefeto Lian North Oar Stee Jareld (J. Musen Trecy Flockwei Conne Miller Steve O'Neir Suzy Frakon I.W. Boxen Dens Long Morgores Brown Posticio Van Reyn Naucargiora John Bascia Stave Derness area Muzen Corete MeM#sn Ciga Howard Milery Whee

Earl England. Jami<del>llet von Re</del>d Bruce Servet Moende Forses Softh Schrede: Lineary Herroton Alben F. Shere Charles J. Gulyse Nancy Hodosa иа тер III. \$\$поиd John M. Group Kerry Dayle Services Single Services Single Services Single Character Johnnie Yion de Woodel Cervi Kreude Gery Roleman Eng Bahwa Bonnie Weltere Lanne Husson Cene LePoso Sary Prenealowski John Gustafson Mario Van Balen August Ven Der Stad Nancy Koron Nathan Koron Per Garnoly Ann Battorson Justin A. Whemon Asacha Barwanga Lauria Borovo John Keisian Don Ward Nathan Karen jerny zakili. Vena Van Sak Orly Halpern Kato Connech Buden Gledek Nancy Frey Angole Fluker When Penry Shuser Albrid nucktary Ingina Chalanay

P.O. Box 73 · Nipomo, California 93444-0073 Our group represents about 400 members - most unable to attend meeting aug. 23, 6-8PM. Complements on your efforts of Dust control as the air coming from the SVRA to Nipomo Maso is often unfit to breathe. Complements on reducing This dust with vegetation, wind forcing, growed concrete panels, planted trees etc. etc. Many of us live in. Nipomo o many of us have lung congestion (like me) and feel the sand coming from your area is the cause. We usge that when this dust gets excessive all vehicle activity in the Mysomo Dines is 570PPE-0. Bill Denneen Executive Director CFAVEND

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Steve Sume Maye Andig Denede Hoffman Rica Comp Cième Madon Cayre Misson Ting Opiciety Gayri Magan Januaro Ces Vinca Bully Andres Perker Economic Char Laurel Scophane Tenya Palez China Semoto Dans Wright Carol Bergar Mehad Možma Las Welenzar State Wilder Laure' Greece Buzarro Lord See Feater Viciente Von Gurn Melan Ella Enc Greening Vvancy Vvacakar Jenene Heddox Nancy Henry Knen Dev Kinen Dav Many Art Foster Keurence Leurens Jly Stresser Leoie Best Isaaly Contre NotMillen history Whose SevSeaua Steve Dauser Cindy Keppher Delyd Robech Judge Arne:a Kitaer Schwyn Keley foresmen Mongarez Trusie Hilde Zagenes Keren Kawazynek William Amerika

\*Perhaps the time has come to re-evaluate the desirability of aff-road vehicle use on state-owned property\*

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Oceano Dunes SVRA	Dust Control Program Final Program	m EIR – March 2017	

#### 4.13 RESPONSE TO COMMENTS FROM BILL DENNEEN

The OHMVR Division received three comments from Bill Denneen, Executive Director of Citizens for a Vehicle Free Nipomo Dunes. In general, these comments addressed this organization's background and the OHMVR Division's approach to dust control at Oceano Dunes SVRA.

**Comment M1:** Citizens for a Vehicle Free Nipomo Dunes provides organizational information and states most members were unable to attend the OHMVR Division's August 23, 2016 public meeting regarding the Draft Program EIR.

Response to Comment M1: Comment noted. The August 23, 2016 meeting reviewed the contents and findings of the Draft Program EIR. As explained in Section 1.1 of this Final Program EIR, the OHMVR Division made available electronic and hardcopies of the NOA and Draft Program EIR for the public's review.

**Comment M2:** Citizens for a Vehicle Free Nipomo Dunes expresses compliments for the OHMVR Division's efforts to control dust at Oceano Dunes SVRA.

Response to Comment M2: Comment noted. The OHMVR Division appreciates the time Mr. Denneen has taken to participate in dust control issues and to provide his organization's comments on the Draft Program EIR.

**Comment M3:** Citizens for a Vehicle Free Nipomo Dunes urges that all vehicle activity in the Nipomo Dunes to be stopped when dust levels get excessive.

Response to Comment M3: Comment noted. The OHMVR Division directs Citizens for a Vehicle Free Nipomo Dunes to Draft Program EIR Chapter 12, which includes a robust evaluation of alternatives to the proposed Dust Control Program, consistent with the requirements of CEQA and the CEQA Guidelines. Specifically, Section 12.2.3 addresses alternatives that considered reduced OHV use areas, similar to that suggested by Citizens for a Vehicle Free Nipomo Dunes. The Draft Program EIR concludes these alternatives would not obtain the objectives the OHMVR Division has set for the proposed Dust Control Program and /or would not reduce the proposed Program's significant environmental effects.

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pg	

# California State Parks Off-Highway Motor Vehicle Recreation Division

# COMMENT LETTER "N"

## Oceano Dunes SVRA Dust Control Project EIR August 23, 2016 Scoping Meeting Comment Card

NAME  DOROTHY MODAPPER!  NAME  1418 VICKI LANG  ADDRESS  NI POMO, CA 93444	
ORGANIZATION /AFFILIATION	
E-MAIL ADDRESS	
Comment: 1) Effectiveness of trees to file PM 2.5 x PM 10 -	Γ
Comment: (1) Effectiveness of trees to files PM 2.5 & PM 10 - EPA Official stated that garticulate matter is too fine to te feltored by trees	N1
Effectiveness of Lencis as opposed to	[
Seffectiveness of fences as opposed to  Negetation: Cost of placing fences + removing (Continue on back if necessary)  Thank You OHMVR Division	N2
as opposed to cost of planting vegetation	   
3 Monitoring vehicle drivers going over new vegetation	N3
new vegetation	

oonses to Draft EIR Comments	Page 4-18
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#### 4.14 RESPONSE TO COMMENTS FROM DOROTHY MODAFFERI

The OHMVR Division received three comments from Dorothy Modafferi. In general, these comments were related to the effectiveness of the Draft Program EIR's proposed dust control measures.

**Comment N1:** Ms. Modafferi states the U.S. Environmental Protection Agency has stated that particulate matter is too fine to be filtered by trees.

Response to Comment N1: Comment noted. Trees reduce wind speed and provide a surface for the deposition of airborne particles. Trees may also absorb a small amount of airborne particulates; however, particles deposited on leaf surfaces may subsequently become re-suspended as leaf litter deteriorates. The potential effectiveness of tree plantings cannot be estimated without knowing the density and species of tree planted. Regardless, the Draft Program EIR does not attempt to take any credit or identify any target effectiveness for potential Program tree plantings. Specifically, Draft Program EIR page 2-17 states, "Tree plantings would be unlikely to control or minimize dust emissions during the five-year period covered by this EIR, but could provide for the long term control of dust emissions."

**Comment N2:** Ms. Modafferi generally questions the effectiveness and costs of installing and removing wind fencing as compared to vegetation.

Response to Comment N2: The Draft Program EIR provides information on the effectiveness of both wind fencing and vegetation.

The OHMVR Division directs the commenter to Draft Program EIR Section 1.1.3, as well as Draft Program EIR Sections 2.3.2.1 and 2.3.2.2, which provide information on the demonstrated effectiveness of vegetation (90% to 99% effective) and seasonal dust control measures (40% to 70% effective on average). Although vegetation is generally accepted to be more effective than wind fencing and other seasonal dust control measures, both types of dust control projects have benefits and disadvantages. With regards to vegetation, the Draft Program EIR states (page 2-21), "The OHMVR Division anticipates that vegetation projects, once established, could cover from 25 to 100 percent of any particular area under control and reach a height of 3 to 5 feet at full growth. Although vegetation would take time to become established and could be hampered by environmental factors such as a short growing season, drought, hardiness of individual plants, etc., it has the inherent ability to respond and potentially stabilize dynamic dune conditions and reduce the need for regular and routine maintenance once the vegetation is established." In contrast, with regards to seasonal dust control measures, the Draft Program EIR states (page 2-22), "Wind fencing and straw bale arrays can be designed to provide a specific control efficiency, can be deployed over a large area rapidly and, once installed, begin to provide immediate sand transport and dust control; however, the effectiveness of these measures decreases with time, and they do not have the ability to respond to dynamic dune conditions and thus can become buried over time (and subsequently later exposed)."

The Draft Program EIR also provides information pertaining to costs associated with potential dust control measures. Draft Program EIR Section 2.3.3 identifies that material availability and project costs are both factors that could affect implementation of specific dust control projects, and Draft Program EIR Section 12.2 identifies that the proposed

Dust Control Program would require a substantial amount of staff and contracted labor (up to 2,000 hours of staff time and 7,000 hours of contracted labor), as well as a substantial investment in equipment and other resources, in order to be successfully implemented.

Comment N3: Ms. Modafferi states, "Monitoring vehicle drivers going over new vegetation."

Response to Comment N3: Comment N3 is not clear; however, presuming the commenter is suggesting the OHMVR Division should monitor vegetation for OHV disturbance, the Draft Program EIR explains that the OHMVR Division would protect and monitor vegetation planted as part of the proposed Dust Control Program. Draft Program EIR Section 2.3.2 states, "The OHMVR Division notes that any dust control measure installed within the Oceano Dunes SVRA open riding and camping area would be surrounded by a perimeter fence for safety reasons." In addition, Draft Program EIR Section 2.3.2.1 states, "The OHMVR Division would monitor vegetation growth by surveying and photomonitoring control areas to ensure vegetation projects become established and meet their design control efficiency."

# California State Parks Off-Highway Motor Vehicle Recreation Division

## Oceano Dunes SVRA Dust Control Project August 23, 2016 EIR Scoping Meeting

# COMMENT LETTER "O"

Comment Card

LINDA Reynolds	
NAME	
resident	
ORGANIZATION /AFFILIATION	
LR BYNOLDS 15/ @gmail. Con	
E-MAIL ADDRESS	
Comment: (presently)	т
Deens that the presentation was lackeng	
on indomations alot a vagueness.	
Seened slasted towards the of road	`
whicles.	Ī
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(Continue on back if necessary)	
Thank You	

**OHMVR Division** 

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#### 4.15 RESPONSE TO COMMENTS FROM LINDA REYNOLDS

The OHMVR Division received two comments from Linda Reynolds. In general, these comments were in regards to the content of the OHMVR Division's August 23, 2016 public meeting presentation on the Draft Program EIR.

**Comment O1:** Ms. Reynolds states the presentation was lacking in information, vague, and biased in favor of OHVs.

Response to Comment O1: Comment noted. As explained during the presentation, the public meeting was intended to provide an overview of the proposed Dust Control Program's background, purpose, and key elements, explain why the OHMVR Division prepared a Program EIR, highlight the key findings of the Draft Program EIR, and explain the OHMVR Division's EIR process, including ways to comment on the Draft Program EIR. Due to the volume of information contained in the Draft EIR, the public meeting was focused primarily on the major components of the proposed Dust Control Program and their potential environmental impacts associated with it. Comment O1 does provide any specific reason or explanation for why the commenter states the presentation was "slanted towards off-road vehicles." As a point of clarification, the Draft Program EIR does identify significant and unavoidable impacts to coastal OHV recreational opportunities, which is a key finding of the Draft Program EIR that required explanation in the public meeting. But, as explained in Draft Program EIR Section 1.4, the Draft Program EIR itself is an objective, informational document that contains a sufficient degree of analysis to inform decision makers about the proposed Dust Control Program's potential direct and indirect physical, environmental effects. The Draft Program EIR does explain the mission and role of the OHMVR Division, and the OHMVR Division is obligated to consider its actions within this context, but the information and findings of the Draft Program EIR are objective and not biased towards any one particular form of recreation.

**Comment O2:** Ms. Reynolds comments that there is a desire to "push this issue down the road" and that the health issue is serious and was not described as not part of CEQA.

Response to Comment O2: The public meeting presentation explained the proposed Dust Control Program is a near-term program that would be implemented as early as 2017. The presentation did not convey any desire to delay the proposed Program in any way. Regarding health issues, the public meeting presentation summarized information contained in Draft Program EIR Sections 1.1.1 and 1.1.2 regarding the health effects of PM10 and the existing air quality conditions downwind of Oceano Dunes SVRA; however, the commenter has misinterpreted the presentation and the Draft Program EIR. As explained in more detail in the response to SLOAPCD Comment D13 (see Section 4.4) of this Final Program EIR), the Draft Program EIR describes the physical environmental conditions at and in the vicinity of the Dust Control Program area at the time the OHMVR Division issued the Revised NOP for the EIR (February 2015). The proposed Dust Control Program would not exacerbate any existing air quality conditions. Rather, as explained in Draft Program EIR Section 3.4.2, the proposed Program activities would "block the flow of wind across the dune landscape, slow or stop sand movement and corresponding dust generation at Oceano Dunes SVRA, and improve downwind air quality." Thus, the proposed Program would not have an adverse impact on air quality conditions that requires discussion in the Draft Program EIR.

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Oceano Dunes SVRA Dust Control Program Final Prog	

# **COMMENT LETTER "P"**

# California State Parks Off-Highway Motor Vehicle Recreation Division

Oceano Dunes SVRA Dust Control Project EIR August 23, 2016 Scoping Meeting Comment Card

Joan Rice	722 Avocet Way
NAME	ADDRESS
	Arroyo Grande, CA 93420
ORGANIZATION /AFFILIATION	
Joan@ joanrice. us	
E-MAIL ADDRESS	
Comment: I am very concerned about	the air quality on the mesa
affecting all residents living there.	hurting their health.
Particulate Matter 10 is harmful	to the health of Californians. P
a compromise can be reached &	ith the off road wellicular
traffic and the health of the onea	
1)	(Continue on back if necessary)
Thank You	
OHMVR Division	

ponses to Draft EIR Comments	Page 4-19
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#### 4.16 RESPONSE TO COMMENTS FROM JOAN RICE

The OHMVR Division received one comment from Joan Rice. This comment pertains to unhealthy air quality conditions on the Nipomo Mesa.

**Comment P1:** Ms. Rice expresses concern for existing air quality conditions on the Nipomo Mesa and the effect these conditions are having on the health of the Mesa's residents.

Response to Comment P1: Comment noted. The OHMVR Division appreciates the time the commenter has taken to participate in dust control issues and to provide comments on the Draft Program EIR; however, Comment P1 does not provide a specific comment or raise any significant, new information regarding the contents and findings of the Draft Program EIR. Draft Program EIR Sections 1.1.1 and 1.1.2 provide information regarding the health effects of PM10 and the existing air quality conditions downwind of Oceano Dunes SVRA. As explained in the response to Comment O2 (see Section 4.15 of this Final Program EIR), the proposed Program would improve air quality conditions on the Nipomo Mesa.

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Oceano Dunes SVRA Dust Control Program Final Prog	

# **COMMENT LETTER "Q"**

## California State Parks Off-Highway Motor Vehicle Recreation Division

Oceano Dunes SVRA Dust Control Project EIR August 23, 2016 Scoping Meeting Comment Card

NAME	ADDRESS
ORGANIZATION /AFFILIATION	
rachelletotioyahoo.com	
	tion did not cover
the plans or to	meline only the
development proc.	ess and way to
Submit comment	8.
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Thank You **OHMVR** Division

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#### 4.17 RESPONSE TO COMMENTS FROM RACHELLE TOTI (AUGUST 23, 2016)

The OHMVR Division received one comment from Rachelle Toti. This comment pertains to the content of the OHMVR Division's August 23, 2016 public meeting presentation on the Draft Program EIR.

**Comment Q1:** Ms. Toti states the August 23, 2016 public meeting presentation did not cover the plans or timeline for the Dust Control EIR, only the development process and way to submit comments.

Response to Comment Q1: Comment noted. As explained in the response to Comment O1 (see Section 4.15 of this Final Program EIR), the public meeting was intended to provide an overview of the proposed Dust Control Program, highlight the key findings of the Draft Program EIR, and explain the OHMVR Division's EIR process, including ways to comment on the Draft Program EIR. The public meeting was not intended to provide an exhaustive summary of the EIR's content or findings. As a point of clarification, the public meeting presentation did explain and summarize information from Draft Program EIR Section 2.3 regarding the initial, five-year scope of the proposed activities that is anticipated to begin in 2017. In addition, Draft Program EIR Section 2.4 describes the proposed schedule of activities for the proposed Dust Control Program.

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### California State Parks Off-Highway Motor Vehicle Recreation Division

# COMMENT LETTER "R"

## Oceano Dunes SVRA Dust Control Project August 23, 2016 EIR Scoping Meeting

#### Comment Card

MUNAME YOUNG 1928 EUGALYPTUS READ  ADDRESS  NIPOHO, GA 93444	
ORGANIZATION /AFFILIATION  MIKBRO 1 e MAC. COM  E-MAIL ADDRESS	
Comment: WHONCE DOES STATE PARKS DOPINE ITS AUTHORITY  TO DO ANY ACTIVITY ON THE LABORAND TRACT OWNED BY  SAN LUIS OBISTO COUNTY? IS CONSENT FROM THE COUNTY  FOUND IN ANY WRITTEN DOCUMENT?	R
HAS THERE BOTH ANY ECONOMIC ANALYSIS OF THE ADJERSS IMPACT OF THE AIRBORNE DUST ON HEALTH, SAFETY, WELFARE, OR PROPORTY VALUES OF PROPLE OR PROPORTY AFFECTED? IF SO, WHORE IS IT? IF NOT, WHY HAS IT NOT BEEN DONG?	R
WAAT ABOUT THE ABSTHETICS OF DUDIE VEHICLES TRESSPESSING ON LAND OWNED BY S.L.O. COUNTY?	R
(Continue on back if necessary)	

Thank You **OHMVR Division** 

Responses to Draft EIR Comments	Page 4-198
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Oceano Dunes SVRA Dust Control Program	n Final Program EIR – March 2017

#### 4.18 RESPONSE TO COMMENTS FROM MICHAEL YOUNG

The OHMVR Division received three comments from Michael Young. In general, these comments are related to the OHMVR Division's authority to implement the proposed Dust Control Program in the proposed Program area and the proposed Program's potential economic and aesthetic impacts.

**Comment R1:** Mr. Young asks where the OHMVR Division's authority to implement the proposed Dust Control Program on the Le Grande Tract is derived from.

Response to Comment R1: As explained in the response to Comment K23 (see Section 4.11 of this Final Program EIR), the OHMVR Division operates the part of the SVRA within the County's La Grande Tract under an existing operating agreement that provides the OHMVR Division with the authority to implement the proposed Dust Control Program.

**Comment R2:** Mr. Young asks if the OHMVR Division has conducted an economic analysis of the adverse impact of dust on the health, safety, welfare or property values of people and property affected.

Response to Comment R2: The OHMVR Division has not conducted an economic analysis of the potential adverse health, safety, welfare, or property value impacts associated with existing air quality conditions. Such a study is not a necessary part of CEQA review of the proposed Dust Control Program. Draft Program EIR Sections 1.1.1 and 1.1.2 provide information regarding the health effects of PM10 and the existing air quality conditions downwind of Oceano Dunes SVRA. As explained in more detail in the response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the Draft Program EIR describes the existing environmental conditions at and in the vicinity of the Dust Control Program area the time the OHMVR Division issued the Revised NOP for the EIR (February 2015). As explained in the response to Comment O2 (see Section 4.15 of this Final Program EIR), the proposed Program would improve air quality conditions on the Nipomo Mesa and thus is not anticipated to result in the adverse impacts raised by Comment R2.

**Comment R3:** Mr. Young asks what about the aesthetics of dune vehicles trespassing on land owned by SLO County.

Response to Comment R3: As explained in more detail in the OHMVR Division's response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the Draft Program EIR describes the existing environmental conditions at and in the vicinity of the Dust Control Program area the time the OHMVR Division issued the Revised NOP for the EIR (February 2015). Specifically, Draft Program EIR Section 6.2 describes the existing visual resource setting of the proposed Dust Control Program and states (page 6-4), "In addition to views of the ocean, beach, open sand areas, and vegetated dunes (i.e., landscapes and landforms), Pismo State Beach and Oceano Dunes SVRA are active recreation areas in which fishing, camping, street-legal and OHVs, equestrian and other recreational activities regularly occur (i.e., cultural modifications). Visitor vehicles and campers may be brightly colored and have flags elevated above the vehicle (particularly parked campers); some campers also install wood or fencing around the camper to reduce sand blasting and erosion during high winds. Pismo State Beach and Oceano Dunes SVRA also include visitor-serving facilities such as marker posts, restrooms, garbage

receptacles, and vendors; fencing that protects vegetation, biological and cultural resources, and generally defines where OHV activity is permitted, is a common sight throughout the park." The proposed Dust Control Program would not alter the aesthetics of OHV recreation at Oceano Dunes SVRA. In addition, as a point of clarification, Oceano Dunes SVRA provides legally authorized recreation opportunities, and the OHMVR Division maintains fencing and other barricades to ensure trespassing onto private and other lands closed to public recreation does not occur.

## **COMMENT LETTER "S"**

#### **Phillip Gleason**

From: Chris Dugan

Sent: Sunday, September 11, 2016 11:25 AM

**To:** Phillip Gleason

**Subject:** FW: Oceano Dunes SVRA Dust Control Draft Program EIR

From: Glick, Ronnie@Parks [mailto:Ronnie.Glick@parks.ca.gov]

**Sent:** Wednesday, August 24, 2016 3:23 PM **To:** Dugan Christopher (<u>cdugan@migcom.com</u>)

Subject: FW: Oceano Dunes SVRA Dust Control Draft Program EIR

From: Davis, Jennifer @Parks On Behalf Of OHV, OHVINFO@Parks

Sent: Wednesday, August 24, 2016 7:53 AM

To: Glick, Ronnie@Parks

Subject: FW: Oceano Dunes SVRA Dust Control Draft Program EIR

Jennifer Davis Grant Administrator

California State Parks
Off-Highway Motor Vehicle Recreation Division
1725 23<sup>rd</sup> Street, Suite 200
Sacramento, California 95816
916-324-3788
jennifer.davis@parks.ca.gov



From: sellps@aol.com [mailto:sellps@aol.com]

Sent: Tuesday, August 23, 2016 3:35 PM

**To:** OHV, OHVINFO@Parks < OHVINFO.OHV@parks.ca.gov > Subject: Oceano Dunes SVRA Dust Control Draft Program EIR

Attention Ronnie Glick, Senior Environmental Specialist

My husband and I own one of five units at 1256 Strand Way in Oceano. This is located right next to the Pier Avenue entrance to Pismo State Beach, where the draft EIR is recommending installation of grooved concrete panels to reduce

the amount of sand tracked off the beach. I'm the President of this Homeowners Association, and I know our neighbors here are just as upset as we are over what is already too much noise pollution at this entrance.

We would like to go on record as strongly opposing installation of these grooved concrete panels at the Pier Avenue entrance, due to increased noise. There is so much noise at this entrance already, with heavy equipment loading and unloading the dumpsters off the beach, right next to our condo complex. Please don't add to what is already unacceptable noise levels, 24/7.

**S**1

15 mph driving on and off the beach is one thing, but speed limits don't matter much to some after that gate closes at night. These are homes right by this gate. For the sand you might not track off the beach, how much more noise pollution will we be subjected to?

Do you have any information on decibel levels at various speed limits, and various types of tires, especially with the number of RV's and ATV haulers that go on and off this beach, that might now be going over grooved concrete panels? And, will you now need more heavy equipment to clean out those grooved tracks that you know will inevitably be constantly filled with sand?

S<sub>2</sub>

At least the street sweepers you have now are much quieter than the ones you used to have, so thank you for that. It would probably be more cost effective in the long run, and less noise considerations, to just continue with your current system of sand removal.

Sincerely,

Norma and Ron Van Meeteren, Owners 1256 Strand Way, #3 Oceano, CA 93445

#### 4.19 RESPONSE TO COMMENTS FROM NORMA AND RON VAN MEETEREN

The OHMVR Division received two comments from Norma and Ron Van Meeteren. In general, these comments were related to the proposed Dust Control Program's potential noise impacts on Pier Avenue.

**Comment S1:** The Van Meeterens explain they own property next to the Pier Avenue entrance to Pismo State Beach and state they are strongly opposed to the installation of grooved concrete panels at this entrance due to potential increase noise impacts.

Response to Comment S1: The commenter's opposition to the installation of grooved concrete panels is noted. Draft Program EIR Impact NOI-2 evaluates the potential increases in noise from vehicle passing over the proposed Pier Avenue track-out prevention device. The evaluation describes existing noise levels, potential changes in noise sources / and noise levels with the proposed concrete panels, and notes that the increase in noise levels could be annoying and / or represent a significant increase in noise levels depending on the device's final design and the specific vehicle mix passing over the device. Accordingly, the OHVMR Division has incorporated Mitigation Measure NOI-1 into the Draft Program EIR, which requires the OHMVR Division to implement design features that are estimated to reduce the potential increase in noise above existing conditions to approximately 1 decibel and thus render Draft Program EIR Impact NOI-1 a less than significant impact.

**Comment S2:** The Van Meeterens ask if the OHMVR Division has information on decibel levels at various speed limits and various types of tires that might go over the proposed grooved concrete panels and whether more heavy equipment operation would be necessary to clean-out the grooved concrete panels.

Response to Comment S2: The OHMVR Division does not have information on decibel levels at various speed limits for various vehicle of types because the use of grooved concrete panels as track-out prevention devices has not been implemented at any other SVRA or other unit of the State Parks system. Grooved concrete panels are used to provide traction at boat launch ramps, but this application is not the same as this typically involves a few trailers moving at very low speeds over wet grooved concrete. Draft Program EIR Section 10.4 does describe the grooved concrete panels would produce an intermittent but recurring noise, the level of which would depend on the device material and the speed, size, and weight of the vehicle passing over the device. Draft Program EIR Section 10.4 also summarizes the results of a Caltrans' investigation of traffic noise generated by rumble strips (primarily permanent rumble strips used in the center or on the side of highways) which found that milled rumble strips increase external noise levels by 5 to 19 decibels, and that sinusoidal rumble strips are 3 to 7 decibels quieter than rectangular strips and increase noise levels by only 0.5 to 1.0 decibels.

In addition, Draft Program EIR Impact NOI-1 discusses the proposed project's potential for temporary and intermittent increases in noise as a result of heavy equipment operation, such as bulldozers and backhoes. Draft Program EIR page 10-8 states, "These vehicles and equipment already operate at and in the vicinity of Pismo State Beach and Oceano Dunes SVRA; under the proposed Program, the use of this equipment could temporarily increase slightly as a result of new dust control measures that would occur in the Program area, and as a result of maintenance of the proposed track-out prevention devices. This increase in equipment operation could result in intermittent increases in

ambient noise levels both in and adjacent to the Program area." The Draft Program EIR concludes noise generated by maintenance of the track-out devices would not be significant because maintenance activities would to take no more than a few hours every one to three weeks, which would not represent a substantial temporary increase in noise levels.

**To:** OHV, OHVINFO@Parks < OHVINFO.OHV@parks.ca.gov > Subject: Oceano Dunes SVRA Dust Control Draft Program EIR

To Whom It May Concern: COMMENT LETTER "T"

I attended your public meeting on the draft EIR and am providing these comments. Since your public meeting failed to discuss the particulars of the program, it is left to the public to wade through 282 pages, which is a huge time commitment. Perhaps that was the point.

- 1) Although I am no expert on EIRs, this one strikes me as being especially problemmatic as its primary focus is not on impact to the environment, or to the real related environmental issue in question- dust air pollution. The impact is focused on impact to recreational riding. The only reference I could find in CEQA related to recreation follows:
- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

If this is your substantiation, I submit it is an incredibly tortured interpretation. So my point: This EIR does not focus on environmental impacts but on recreational impacts.

- 2) There is no evidence that the controls you propose have been scientifically analyzed to prove their effectiveness. Contrary to your comments at the public meeting, the APCD has NOT determined that your measures to date have reduced the dust pollution to any real extent.
- 3) On page 1-7, you indicate that the agencies involved in resolving this health hazard have reached a consensus on your proposed approach. If so, why would the APCD propose an alternative, which you reject.
- 4) Why do you say you want to reduce the dust to meet federal air quality standards but only make ongoing progress on meeting state standards? State standards protect public health and that should be your goal. S-9 is the first time there is reference to making progress toward Rule 1001 performance standards. It would seem THAT should be the focus of this EIR.
- 5) You have excluded from the program all of the area that is most emissive.
- 6) You fail to consult with representatives of the Chumash on this program. There is also no mention of fencing off native sites to protect them, if identified.
- 7) You fail to mention the County as owner of the LaGrande Tract in the project description
- 8) What constitutes a 'significant impact' is not defined.
- 9) You mention potential trails through planted vegetation. Given the track record of the riders and photos I have demonstrating their lack of respect for fencing and Chumash middens, any such suggestion should be moot.

Arlene Versaw Nipomo Mesa .

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Oceano Dunes SVRA Dust Control Program Final Pro	

#### 4.20 RESPONSE TO COMMENTS FROM ARLENE VERSAW

The OHMVR Division received nine comments from Arlene Versaw. In general, these comments were related to the adequacy of the Draft Program EIR.

**Comment T1:** Ms. Versaw states that the Draft Program EIR is problematic and is not focused on impacts to the environment or dust air pollution. Ms. Versaw states that the Draft Program EIR is focused on impacts to recreational riding.

Response to Comment T1: Comment T1 does not present any specific information or evidence explaining why the Draft Program EIR does not address environmental impacts, including air pollution. Draft Program EIR Chapter 1 explains the OHMVR Division prepared the Draft Program EIR "to evaluate the potentially significant environmental impacts that may result from Oceano Dunes SVRA Dust Control Program (page 1-1)" and that the Draft Program EIR was prepared in accordance with CEQA and the CEQA Guidelines. In addition, Draft Program EIR Section 1.5.5 states, "In accordance with CEQA Guidelines Section 15126, this EIR identifies and focuses on the potentially significant environmental effects of the proposed project, as determined based on the project description contained in this EIR, oral comments received at the public scoping meeting for the EIR on February 17, 2015, and written comments received during the public review period for the NOP (February 6, 2015 to March 9, 2015). Accordingly, this EIR focuses on one or more significant impacts to the following resource areas identified in Appendix G to the State CEQA Guidelines: Recreation, Land Use and Planning, Aesthetics, Biological Resources, Cultural Resources, Hydrology and Water Quality, and Noise." Finally, as explained in the OHMVR Division's response to Sierra Club Comment I2 (see Section 4.9 of this Final Program EIR), the OHMVR Division, as CEQA Lead Agency, determined that the temporary and / or permanent change in the allowable form (i.e., vehicular and non-vehicular activities), availability, and location of coastal recreation opportunities at Oceano Dunes SVRA that could occur with implementation of the proposed Program constituted a physical change to the recreation environment that required evaluation under CEQA.

**Comment T2:** Ms. Versaw states the Draft Program EIR does not contain evidence that the proposed dust control measures have been scientifically analyzed to prove their effectiveness. Ms. Versaw states the SLOAPCD has not determined that dust control measures implemented to date have reduced dust pollution.

Response to Comment T2: The commenter is mistaken regarding available scientific evidence. As explained in the OHMVR Division's response to Comment N2 (see Section 4.14 of this Final Program EIR), the Draft Program EIR provides information on the demonstrated effectiveness of vegetation (90% to 99% effective) and seasonal dust control measures (40% to 70% effective on average). In addition, Draft Program EIR Section 1.1.3 summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA and which helped to form the basis for the proposed Dust Control Program. None of these studies describe the level of dust control necessary to achieve compliance with the Rule 1001 performance standard. Even the SLOAPCD, in its comments on the Draft Program EIR, acknowledges that the magnitude of emissions reductions, as well as the areas where mitigation will be most effective, is still being evaluated (see response to Comment D2 in Section 4.4 of this Final EIR).

The commenter is partly correct the SLOAPCD has not conclusively determined dust control measures installed at Oceano Dunes SVRA in the past have not reduced dust pollution – as measured at the SLOAPCD's CDF station. Draft Program EIR Section 1.1.3, as revised by this Final Program EIR (see Section 3.2), clearly states, "SLOAPCD analysis have indicated that the 2015 seasonal dust control measures may not have been effective at reducing PM10 levels at the SLOAPCD's CDF station due to anomalous meteorological conditions in 2015 . . . ." But, as described above, several studies have documented the effectiveness of vegetation and seasonal dust control measures within and immediately downwind of the treatment area.

**Comment T3:** Ms. Versaw states Draft Program EIR page 1-7 is incorrect when it states agencies have reached a consensus on the proposed Dust Control Program.

*Response to Comment T3:* As shown in Section 3.2 of this Final Program EIR, the OHMVR Division has revised the text on Draft Program EIR page 1-7 to reflect that only the OHMVR Division and CARB have reached consensus on the proposed Dust Control Program.

**Comment T4:** Ms. Versaw states the goal and focus of the Draft Program EIR should be to make progress toward the state ambient air quality standard and Rule 1001 performance standard.

Response to Comment T4: As explained in the OHMVR Division's response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), the uncertainty surrounding the magnitude of dust control measures needed to comply with the Rule 1001 performance standard is a major reason why the OHMVR Division has set forth clear and flexible objectives for the proposed Program (e.g., see Draft EIR page 2-1, objective 3, to "make ongoing and best possible progress toward compliance with SLOAPCD Rule 1001 performance standard"). Importantly, the clear and flexible objectives set for the proposed Program do not preclude achieving compliance with the Rule 1001 performance standard or the state's PM10 ambient air quality standard.

**Comment T5:** Ms. Versaw states the proposed Dust Control Program area excludes all of the area that is most emissive.

Response to Comment T5: Comment T5 does not define what is meant by the "area that is most emissive." Presuming the commenter is referring to the La Grande Tract, the OHMVR directs the commenter to Draft Program EIR Section 2.3.1.1, which provides a discussion on the basis for selecting the proposed Dust Control Program area, stating, "The Program area includes most of the open sand areas in the central to northern portion of the Oceano Dunes SVRA open riding and camping area, commonly referred to as the "La Grande Tract." SLOAPCD and OHMVR Division studies have identified this area as the area most likely influencing air quality measurements at the CDF station and air quality conditions on the Nipomo Mesa."

**Comment T6:** Ms. Versaw states the OHMVR Division has failed to consult with representatives of the Chumash regarding the proposed Dust Control Program and that Draft Program EIR does not mention fencing native sites to protect them.

*Response to Comment T6:* The commenter is incorrect. Draft Program EIR Sections 3.3 and 8.2.4 describe the Native American consultation that has occurred for the proposed Dust Control Program, including communication with the Northern Chumash Tribe. In addition, Draft Program EIR Section 8.3.2 describes the requirements the OHMVR

Division has incorporated into the proposed Dust Control Program to minimize and avoid potential adverse effects on cultural resources, including a requirements to inventory, monitor, and avoid resources with the use of flagging or fencing as deemed necessary by a qualified cultural resource specialist.

**Comment T7:** Ms. Versaw states the Draft Program EIR fails to mention the County as the owner of the La Grande Tract.

Response to Comment T7: The commenter is correct. Portions of Oceano Dunes SVRA and the proposed Dust Control Program area are owned by SLO County. The OHMVR Division operates the part of the SVRA within the County's La Grande Tract under an existing operating agreement. This existing operating agreement provides the OHMVR Division with the existing authority to implement the proposed Dust Control Program. As a point of clarification, Draft Program EIR Section 2.3.1 does state that the primary Dust Control Program area consist of "state-owned" and "state-operated" lands. This information does not change any of the findings or conclusions of the Draft Program EIR.

**Comment T8:** Ms. Versaw states that the Draft EIR does not define what constitutes a significant impact.

Response to Comment T8: The commenter is incorrect. The Draft Program EIR evaluates the proposed Dust Control Program's potential impacts against thresholds of significance specific to the resource being evaluated. See, for example, Draft Program EIR Sections 4.3.1, 5.3.1, etc. The significance criteria are based primarily on Appendix G to the CEQA Guidelines; however, thresholds from other sources, such as the SLOAPCD's CEQA significance thresholds, were considered and used where appropriate. Refer also to the OHMVR Division's response to SLOAPCD Comment D9 (see Section 4.4 of this Final Program EIR) and Sierra Club Comment I2 (see Section 4.9 of this Final Program EIR) for more information on this issue.

**Comment T9:** Ms. Versaw implies that trails through planted vegetation is not a good idea. Ms. Versaw refers to photographic evidence that OHV activity impacts vegetation and cultural resources but does not provide the referenced evidence.

Response to Comment T9: The Draft Program EIR explains that the OHMVR Division would protect and monitor vegetation planted as part of the proposed Dust Control Program. Draft Program EIR Section 2.3.2 states, "The OHMVR Division notes that any dust control measure installed within the Oceano Dunes SVRA open riding and camping area would be surrounded by a perimeter fence for safety reasons." In addition, Draft Program EIR Section 2.3.2.1 states, "The OHMVR Division would monitor vegetation growth by surveying and photo-monitoring control areas to ensure vegetation projects become established and meet their design control efficiency."

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Oceano Dunes SVRA Dust Control Program Final Prog	

# September 5, 2016

# COMMENT LETTER "U"

Mr. Ronnie Glick, Senior Environmental Scientist Oceano Dunes District CDPR, OHMVR Division 340 James Way, Suite 270 Pismo Beach, CA 93449

SUBJECT: Oceano Dunes SVRA Dust Control Draft Program EIR

Dear Mr. Glick:

The ODSVRA is a relatively small public area and is unique for our state by providing the only public vehicle access on our beaches. The off-highway vehicle (OHV) recreational opportunity consists of ~1,500 acres, and these coastal dunes are recognized worldwide. Closing the dunes to off-roaders and closing the beach to vehicles are not options or solutions in my opinion. With courtesy, cooperation, patience, teamwork, and communication by all who have an interest, acceptable resolutions should be forthcoming.

The wind, sand and ATV riders came before homes were built on the mesa (the wind and sand in fact are what created the mesa). Dune buggies have been on the dunes since the 1930s and vehicles have been on the beach since the early 1900s. The homeowners on the mesa have a responsibility to check out the area before buying; not unlike building or buying a home in a known flood plain.

Instead of the mesa homeowners complaining and demanding the state take action to solve their health concerns for them, I suggest they take the initiative and make a concerted effort to resolve the problem themselves first. This can be done in various ways utilizing wind fences or planting trees/vegetation around their property perimeters to block or shield against the blowing dust particles into their homes, and provide privacy.

I have questions regarding the subject program:

- 1) What happens to this program after the five-year period? If the program produces desired and measured results (what are the results criteria?), then will it be implemented permanently? What if these measures do not produce significant impacts (what's Plan B)?
- 2) Is it possible or would it be feasible to provide another vehicle access closer to the dunes than from Pier Avenue in Oceano? Perhaps from Oso Flaco Road? The Pier Avenue access requires vehicles driving past the protected Snowy Plover area and crossing Arroyo Grande Creek to get to the dunes. I'm thinking that if there was a shorter and more-direct route to the dunes from the other end of the riding area, it might reduce the amount of particulates in the air? I may be over-reaching but it's an idea that the experts might consider.
- 3) How many homes on the mesa are within the air currents and affected by the air pollution from the dunes? Is it a large area or relatively small? I would think this information would help to determine what measures need to be taken and where.

U3

I have concerns and suggestions regarding the subject program:

1) I have environmental safety concerns about using a soil stabilizer and any effects it may have in the future. I think it can be a viable option if a product can be found that is safe for the environment, humans, native vegetation, and wildlife. I did some Internet surfing and found this product for your consideration: <a href="http://www.soilworks.com/media/101960/sgs1507021-gorilla-snot-safety-data-sheet.pdf">http://www.soilworks.com/media/101960/sgs1507021-gorilla-snot-safety-data-sheet.pdf</a>. Despite the name "Gorilla-Snot", it appears to be a reputable product.

U5

U6

**U7** 

IJ8

U9

- 2) I'm concerned that the annual planting of 20 acres of native dune vegetation will not be cost-effective as it will require initial care and watering to establish the plants. Also, it will require closing off this planting area to off-roaders which in turn further decreases the off-road recreating area.
- 3) My concern with the track-out prevention devices is how to keep the sand buildup cleaned out; unless they will be installed into the sloped asphalt ramps at both locations? Even if this is the case, I envision sand still accumulating below the tracks which would require some sort of vacuum system for the sand removal? I'm assuming a product such as the Grizzly Trackout Control Device is being considered: <a href="http://www.trackoutcontrol.com/about\_page.htm">http://www.trackoutcontrol.com/about\_page.htm</a>
- 4) Wind fencing requires constant maintenance to keep them taut, stable and the sand away. This is evidenced by the yearly fencing installed near the access ramps at Grover Beach and Pier Avenue. It does not take long for the sand accumulation to break down the fencing and support posts. I think this would be even more prevalent within the dune area requiring constant maintenance.
- 5) As indicated on Page 2-18 of Volume 1 of the subject EIR, I think the downwind tree planting is a good idea but I suggest planting on government-owned lands in lieu of privately-owned lands where permissions will have to be obtained which will lead to some in agreement and others against; or stipulations demanded. Homeowners can plant trees/vegetation on their own property (see the third paragraph of this letter on page 1 above). The planting on government-owned land gives the state more control of what to plant and where and provide an aesthetic boundary for the area. It would drastically reduce the air pollution for mesa residents and still allow off-roaders a place to recreate; thus retaining the much-needed and unique source of income for our local communities, county, and state that the off-roaders provide. I would also suggest planting non-native Eucalyptus trees as the climate is suited to them, they grow fast and tall and they require little water. If there is a native tree that fits these criteria, all the better. The trees will provide a dust screen located downwind and within air currents between the dunes and the mesa. The tree planting can be a community event and I bet the off-roaders would even be willing and happy to pitch in as well.

Thank you for the opportunity to respond to the subject EIR.

Sincerely,

Ms. Betty Cary
2531 Cienaga Street, Space 25
Oceano, CA 93445-8920
(805) 474-1087
bty8boop@att.net

# 4.21 RESPONSE TO COMMENTS FROM BETTY CARY

The OHMVR Division received nine comments from Betty Cary. In general, these comments were related to existing conditions, proposed dust control measures, and alternatives evaluated in the Draft Program EIR.

**Comment U1:** Ms. Cary summarizes information on Oceano Dunes SVRA, notes Oceano Dunes SVRA predates homes on the Nipomo Mesa, and argues private homeowners should plant trees around their properties to block dust particles.

Response to Comment U1: Comment noted. The information provided by the commenter is consistent with the information contained in Draft Program EIR Section 2.2.3 and Chapter 4. Comments on the actions of private landowners are outside the scope of the OHMVR Division's environmental review; however, Draft Program EIR Section 2.3.2.3 does describe that the OHMVR Division may plant trees as part of a longer-term dust control process on private lands immediately located immediately east of Oceano Dunes SVRA.

**Comment U2:** Ms. Cary asks whether the proposed Dust Control Program would be permanently implemented if it is successful and whether there is a back-up plan if the measures are not successful.

Response to Comment U2: Draft Program EIR Chapter 2 describes that the OHMVR Division is proposing to implement the Oceano Dunes SVRA Dust Control Program for a period of five years, although some specific components, such as planting vegetation and track-out devices would be permanent components that would remain in place for longer than five years. The OHMVR Division would, after the fifth year of implementation of the proposed Program, evaluate to what degree the proposed Dust Control Program has met the objectives it has set forth for the proposed Program in Draft Program EIR Section 2.1 and whether changes in the proposed Dust Control Program area necessary and /or required. As described in Draft Program EIR Section 1.3, if the OHMVR Division determines the later activities would have effects that were not examined in this Program EIR, it would evaluate potential impacts under PRC Section 21166, which only requires subsequent CEQA review in certain circumstances. At this time, there is no back-up plan, or "Plan B," only the proposed Dust Control Program described and analyzed in the Draft Program EIR.

**Comment U3:** Ms. Cary asks whether it is possible or feasible to provide another vehicle access point besides Pier Avenue, such as an access point from Oso Flaco Road

Response to Comment U3: Changes to public access points to Pismo State Beach and Oceano Dunes SVRA are not part of the proposed Dust Control Program and are therefore outside the scope of the OHMVR Division's environmental review of the proposed Program. Establishing a southerly entrance to Oceano Dunes SVRA would be very unlikely to change the Oceano Dunes SVRA open riding and camping area or the requirements of SLOAPCD Rule 1001 and need for the OHMVR Division to develop a dust control program at Oceano Dunes SVRA pursuant to Rule 1001.

**Comment U4:** Ms. Cary asks how many homes on the Nipomo Mesa are affected by air pollution from the dunes and states this information would help determine what measures need to be taken and where.

Response to Comment U4: No SLOAPCD study identifies the number of homes located on the Nipomo Mesa, or more specifically the number of homes within the SLOAPCD's CDF air quality forecast zone, which is the zone that experiences the worst air quality conditions during high wind and dust events. Draft Program EIR page 2-6 does state, "In December 1998, SLO County approved the Woodlands Specific Plan, which permits up to 1,320 total residential units on approximately 300 acres of land southeast of the SVRA. plus other recreational (e.g., golf course) and commercial land uses." But, regardless of the exact number of homes on the Nipomo Mesa, the Draft Program EIR discloses the most current scientific information regarding the areas at Oceano Dunes SVRA that have the highest potential to generate dust and PM10 emissions. The OHMVR directs the commenter to Draft Program EIR Section 2.3.1.1, which provides a discussion on the basis for selecting the proposed Dust Control Program area, stating, "The Program area includes most of the open sand areas in the central to northern portion of the Oceano Dunes SVRA open riding and camping area, commonly referred to as the 'La Grande Tract." SLOAPCD and OHMVR Division studies have identified this area as the area most likely influencing air quality measurements at the CDF station and air quality conditions on the Nipomo Mesa."

**Comment U5:** Ms. Cary expresses concern about potential effects of using a soil stabilizer and suggests the use of a product named Gorilla Snot.

Response to Comment U5: The OHMVR Division appreciates the commenter's time and effort to research soil stabilizers. Draft Program EIR page 2-23 provides a description regarding the potential use of soil stabilizers as part of the proposed Dust Control Program. Accordingly, the Draft Program EIR does evaluate the potential impacts of this activity where necessary and appropriate (see Draft Program EIR Sections 6.3.3 and 9.3.2, Draft Program EIR Tables 2-5 and 12-1, and Draft Program EIR Impacts BIO-2 and HYD-1). In addition, Draft Program EIR Table 2-5 and Section 9.3.2 describes the requirements the OHMVR Division has incorporated into the Dust Control Program to avoid and minimize impacts from the use of soil stabilizers. These requirements include, but are not limited to, the selection and use of a non-toxic, environmentally friendly stabilizer in consultation with the CCC and in consideration of factors such as surface runoff, breakdown of products, ingestion of product by animals and humans, and downwind drift of any potential stabilizer product. The commenter's proposed product may be considered for use if it meets these conditions.

**Comment U6:** Ms. Cary expresses concern that planting 20 acres of vegetation will not be cost-effective and will require initial care and watering, as well as decrease the area open to OHV recreation.

Response to Comment U6: Comment U6 is consistent with the information presented in the Draft Program EIR. Draft Program EIR page 2-28 states, "The OHMVR Division would consider the capital and recurring costs associated with Dust Control Program activities, with preference to projects that are most cost-effective." In addition, as explained in more detail in the response to Comment N2 (see Section 4.14 of this Final Program EIR), vegetation and seasonal dust control projects have benefits and disadvantages, and Draft Program EIR page 2-21 identifies that vegetation would take time to become established and could be hampered by environmental factors such as a short growing season, drought, hardiness of individual plants, etc. Finally, Draft Program EIR Impact REC-1 evaluates the potential for the proposed Dust Control Program to limit and interfere with coastal vehicular recreation areas and concludes the proposed Program

would result in a significant and unavoidable impact to vehicle recreation at Oceano Dunes SVRA.

**Comment U7:** Ms. Cary expresses concern regarding keeping sand out of the proposed track-out prevention devices.

Response to Comment U7: Comment noted. Draft Program EIR page 10-8 describes that maintenance of the track-out devices would to take no more than a few hours every one to three weeks.

**Comment U8:** Ms. Cary expresses concern that wind fencing requires constant maintenance.

Response to Comment U8: Comment U8 is consistent with the information presented in the Draft Program EIR. As explained in more detail in the response to Comment N2 (see Section 4.14 of this Final Program EIR), both vegetation and seasonal dust control projects have benefits and disadvantages. With regards to seasonal dust control measures, the Draft Program EIR states (page 2-22) "Wind fencing and straw bale arrays can be designed to provide a specific control efficiency, can be deployed over a large area rapidly and, once installed, begin to provide immediate sand transport and dust control; however, the effectiveness of these measures decreases with time, and they do not have the ability to respond to dynamic dune conditions and thus can become buried over time (and subsequently later exposed)."

**Comment U9:** Ms. Cary supports the proposed Dust Control Program's tree plantings, but suggests the OHMVR Division focus on planting trees on public lands, not private lands where the OHMVR Division would have to receive permission.

Response to Comment U9: Comment noted. Draft Program EIR page 2-22 states, "... the area under the control of the OHMVR Division does not contain, and is not conducive to the growth of, large groves of trees ..." Thus, the OHMVR Division identified private lands adjacent to SR 1 and which contain non-native eucalyptus stands as an area for potential tree plantings. Furthermore, as explained on Draft Program EIR page 2-22, the planting of trees would only occur if the OHMVR Division could successfully negotiate with private landowners to plant trees.

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Oceano Dunes SVRA Dust Control Program Final Prog	gram EID - March 2017

# COMMENT LETTER "V"

October 3, 2016

Ronnie Glick, Senior Environmental Scientist Oceano Dunes District CDPR, OHMVR Division 340 James Way, Suite 270 Pismo Beach, CA 93449

RE: Draft Program Environmental Impact Report (EIR) for the Oceano Dunes State Vehicle Recreation Area (SVRA) Dust Control Program, State Clearinghouse No. 2012121008

Dear Mr. Glick,

In light of comments made by Air Pollution Control Officer, Larry Allen, at the September 28, 2016 meeting of the SLO County Air Pollution Control District, it appears premature to move forward with any significant dust control project or environmental review at this time. Mr. Allen specifically stated upon completion of additional computer modeling and the compilation of additional data an appropriate suite of mitigation measures would be identified. Mr. Allen went on to say, that based on this new information State Parks would duplicate their environmental review process and Coastal Development Permits for the new project description. Perhaps that is why the EIR is programmatic.

V1

It appears the current suite of options for particulate matter reduction include many of the same strategies used since 2011 when emergency permits were obtained for projects deployed by State Parks. It also appears the current term is for just 5 years. Additionally, the program area should not include any private property or consider any tree planting scheme.

V2

I object to seasonal dust control measures such as wind fencing, straw bales, and porous roughness elements because they are labor intensive, expensive and marginally effective. Non-toxic environmentally friendly soil stabilizers on this large scale project do not pass the "laugh test" for deployment.

V3

The new track out prevention device to be constructed at Pier Avenue is too little too late. What about all of the other adverse impacts of SVRA activity such as noise, traffic congestion and pedestrian conflicts, dust, creek crossing which adversely affect coastal resources, just to name a few. None of the projects contemplated in the EIR provide any added measure of mitigation for impacts imposed upon the community of Oceano and its residents. The SVRA should follow 1982 CDP and relocated the Pier Ave. entrance to the south.

V4

The La Grande Tract owned by the county of San Luis Obispo is one of the most emissive areas for particulate matter. Coincidently a portion (approximately 2 miles) of the Sand Highway traverses the La Grande Tract. It would appear a substantial source of dust emissions is resulting from off highway vehicle traffic on the Sand Highway and from the La Grande Tract in general. However, it appears the project will not interfere with traffic along this highway by placing hay bales, wind fencing or plantings. Much of the traffic using the Sand Highway is destined for the primary riding area south of the La Grande Tract.

**V5** 

An alternative to the proposed project is to establish a southerly entrance to the SVRA as required by the 1982 Coastal Development Permit. A new southerly location would have the result of reducing Vehicle Miles Traveled (VMT) by approximately 1,400,000 miles as an example, (2 miles x 2 for ingress and egress (350,000 vehicles) per year. Please see the letter from J.H. Edwards to Ryan Hostetter dated September 29, 2016 regarding the County of San Luis Obispo Planning Commission consideration of the Phillips 66 Rail Spur Extension project sent to you under separate cover. New access should be considered as an alternative to the proposed project.

V6

Installation of new enhanced filtration systems for existing residential heating and cooling (HVAC) units for homes on the Mesa and elsewhere downwind of the SVRA is more laughable than soil binders.

/7

Please consider the seasonal closure of the entire ODSVRA from mid-February to just before Memorial Day for a period of three years. While this alternative may not meet State Parks objectives for the provision of recreational lands, it could be an important precedent with regard to ruling out the SVRA as a primary contributing source to dust emissions.

V8

The No Comprehensive Dust Control Program (NCDCP) appears to be the best immediate option because it conserves resources until the APCD and CARB buy in to the best mitigation programs, if any.

**V**9

On a miscellaneous note, the project likely must comply with Assembly Bill 2616. Please add a section to the DEIR to discuss the new law in the context of the proposed project.

V10

# Known Areas of Controversy:

Pursuant to CEQA Guidelines please identify the potential violation of the permit conditions by State Parks of the Coastal Development Permit No. 4-82-300 as amended which requires under Special Condition 1.B. (part of the original 1982 CDO) a relocation of the current SVRA entrance at Pier Avenue to a southerly location as a known area of controversy.

V11

On balance, the projects proposed represent form over substance. To date, over \$5 million has been spent by State Parks on remedial efforts with limited results. A better use of resources in the short term is the NCDCP with the additional provision of monitoring equipment. However, it appears a viable long term approach is the processing of a CDP amendment to relocate the entrance to the SVRA at the Phillips 66 Santa Maria Refinery on land dedicated by Phillips 66.

Please feel free to contact me with any questions you may have.

Sincerely,

Jeff Edwards

Jeff Edwards

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# 4.22 RESPONSE TO COMMENTS FROM JEFF EDWARDS

The OHMVR Division received twelve comments from Jeff Edwards. In general, these comments are related to existing conditions and operations at Oceano Dunes SVRA and the Draft Program EIR's description of seasonal dust control measures and alternatives analysis.

**Comment V1:** Mr. Edwards references comments made by the SLOACPD Air Pollution Control Officer at the September 28, 2016 SLOAPCD Board meeting.

Response to Comment V1: Comment noted. As explained in the response to CCC Comment C4 (see Section 4.3 of this Final Program EIR) and SLOAPCD Comment D2 (see Section 4.4 of this Final Program EIR), it is currently not possible for the OHMVR Division or any other agency, including the SLOAPCD, to definitively and conclusively identify what magnitude of dust control is necessary to achieve compliance with the Rule 1001 performance standard. The SLOAPCD acknowledges that the OHMVR Division, the SLOAPCD, and CARB are currently in the preliminary stages of undertaking a modeling exercise that may inform the location and magnitude of dust control measures installed at Oceano Dunes SVRA; however, as described in Section 2.1.3.1 of this Final Program EIR, this exercise is still only in its preliminary stages. The commenter is correct that this fact is one of the reasons why the OHMVR Division decided to prepare a Program EIR for the proposed Dust Control Program.

**Comment V2:** Mr. Edwards states that it appears the Draft Program EIR includes similar dust control strategies as that previously implemented at Oceano Dunes SVRA. Mr. Edwards states the proposed Dust Control Program area should not include any private property or consider any tree planting scheme.

Response to Comment V2: The commenter is correct that the proposed Dust Control Program includes planting vegetation and the deployment of seasonal dust control measures, both of which have occurred previously at Oceano Dunes SVRA. The commenter is correct that the OHMVR Division is proposing to implement these dust control strategies for a period of five years. The commenter does not provide any specific reason why the proposed Dust Control Program area should not include private property or consider tree plantings that warrants a response.

**Comment V3:** Mr. Edwards objects to the proposed seasonal dust control measures because they are labor intensive, expensive, and marginally effective. Mr. Edwards also implies the use of non-toxic soil stabilizers on a large scale is not feasible.

Response to Comment V3: Comment noted. As explained in the response to Comment N2 (see Section 4.14 of this Final Program EIR), the Draft Program EIR provides information on demonstrated effectiveness of vegetation (90% to 99% effective) and seasonal dust control measures (40% to 70% effective on average). Although vegetation is generally accepted to be more effective than wind fencing and other seasonal dust control measures, both types of dust control projects have benefits and disadvantages. With regards to seasonal dust control measures, Draft Program EIR page 2-22 explains that seasonal dust control measures can be designed to provide a specific control efficiency, can be deployed over a large area rapidly and, once installed, begin to provide immediate sand transport and dust control.

With regard to soil stabilizers, the OHMVR Division is not proposing the large scale application of these products at this time. Draft Program EIR Section 2.3.2.4 describes

that soil stabilizers, if used, would be a type of pilot or demonstration project deployed on a small scale. Specifically, Draft Program EIR page 2-23 states, "The proposed Dust Control Program incorporates feasible, scientifically-documented dust control methods available to the OHMVR Division as of the time of the writing of this EIR (June 2016). In the future, additional dust control methods may be tested and/or implemented at Oceano Dunes SVRA. In general, the OHMVR Division would initially test new dust control methods on a small scale. These one- to two-acre pilot and demonstration projects would be located adjacent to the seasonal dust control measures established by the OHMVR Division. Although the exact information and details of such projects are uncertain, the OHMVR Division anticipates that pilot projects may include taller or more narrowly-spaced wind fencing, different-sized PREs, soil stabilizers, or other artificial materials that would block the flow of wind and reduce sand transport and dust generation at Oceano Dunes SVRA."

**Comment V4:** Mr. Edwards asks about adverse impacts from existing activities and operations at Oceano Dunes SVRA, such as noise, traffic, and creek crossings. Mr. Edwards notes the Draft Program EIR does not identify any measures that improve impacts on the community of Oceano and states the OHMVR Division should follow the 1982 CDP and relocate the Pier Avenue entrance to the south.

Response to Comment V3: As explained in more detail in the response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the existing physical environmental conditions in the vicinity of the project constitute the baseline conditions by which a lead agency determines whether an impact is significant (CEQA Guidelines Section 15125). As described Draft Program EIR Section 10.3, Pismo State Beach and Oceano Dunes SVRA are very popular destinations, with millions of visitors passing through the park entrance kiosks on Pier Avenue and Grand Avenue, as well as other park access points. As such, community effects from noise and traffic queues associated with daily park operations are part of the baseline environmental conditions presented in the Draft Program EIR Comment V4 does not provide a specific comment or raise any significant, new information regarding the contents and findings of the Draft Program EIR. Rather, Comment V4 primarily refers to existing access through the Pier Avenue entrance, which the proposed Program does not change. But, as a point of clarification and as explained in the response to Comment O2 (see Section 4.15 of this Final Program EIR), the proposed Program would improve air quality conditions on the Nipomo Mesa. The proposed grooved concrete panels would also control track-out onto Pier Avenue, which does benefit the community of Oceano.

The OHMVR Division is not proposing to close Pier Avenue, and changes in access to Pismo State Beach and Oceano Dunes SVRA are outside the scope of the OHMVR Division's review of the proposed Dust Control Program. Similarly, Draft Program EIR Section 2.2.4.2 states, "The OHMVR Division is not proposing to perform any activities that would change compliance with existing CDP 4-82-300 conditions, as amended."

**Comment V5:** Mr. Edwards states OHVs driving on the Sand Highway and the La Grande Tract in general area are a substantial source of particulate matter. Mr. Edwards states the proposed Dust Control Program would not interfere with the Sand Highway.

Response to Comment V5: Comment V5 is generally consistent with the information presented in the Draft Program EIR. Draft Program EIR Sections 1.1 and 2.3.1.1 note the primary Program area includes the La Grande Tract, which studies have identified as the

area most likely influencing air quality measurements at the SLOAPCD CDF station and the air quality conditions on the Nipomo Mesa. In addition, Draft Program EIR Figures 2-2 to 2-5 graphically depict the location of the Sand Highway at Oceano Dunes SVRA. The commenter is correct that the proposed Dust Control Program would not interfere with the Sand Highway. Specifically, Mitigation Measure REC-1 requires the OHMVR Division to plant vegetation and deploy seasonal dust control measures in a manner that does not interfere with the Sand Highway and other established paths of travel.

**Comment V6:** Mr. Edwards states that an alternative to the proposed Dust Control Program is to establish a southerly entrance to Oceano Dunes SVRA, possibly as part of the Phillips 66 Refinery Rail Spur Project.

Response to Comment V6: Comment noted. Changes to public access points to Pismo State Beach and Oceano Dunes SVRA are not part of the proposed Dust Control Program and are therefore outside the scope of the OHMVR Division's environmental review of the proposed Program. Furthermore, establishing a southerly entrance to Oceano Dunes SVRA would not eliminate SLOAPCD Rule 1001 or the need for the OHMVR Division to develop a dust control program at Oceano Dunes SVRA.

**Comment V7:** Mr. Edwards implies the use of enhanced filtration systems is less feasible and desirable than the use soil stabilizers on a large scale.

Response to Comment V7: Comment noted. Draft Program EIR Section 12.2.4 evaluates off-site mitigation in the form of enhanced filtration systems for residential heating and cooling systems and concludes this alternative is infeasible and would not achieve most of the proposed Program's objectives or reduce or substantially lessen the proposed Program's significant environmental effects.

**Comment V8:** Mr. Edwards asks the OHMVR Division to consider closing Oceano Dunes SVRA from mid-February to just before Memorial Day for a period of three years. Mr. Edwards acknowledges that this may not meet the OHMVR Division's objectives to provide recreational lands, but notes it could provide information on whether or not Oceano Dunes SVRA is a primary contributor to dust emissions.

Response to Comment V8: The OHMVR Division appreciates the commenter's careful review of the objectives the OHMVR Division has set for the proposed Dust Control Program; however, Draft Program EIR Section 12.2.3, as revised by Section 3.8 of this Final Program EIR, evaluates a Reduced OHV Use Alternative in which the OHMVR Division would voluntarily restrict the size of the area open to vehicular recreation at Oceano Dunes SVRA. The text indicates vehicle use restrictions are not likely to be as effective at reducing saltation and associated dust production at Oceano Dunes SVRA as the proposed Dust Control Program activities and further concludes the alternative would not obtain most of the basic objectives set for the proposed Program nor avoid or substantially lessen the proposed Program's significant and unavoidable impacts. Accordingly, the OHMVR Division has rejected this alternative from more detailed consideration. Refer also to the response to Comment D12 (see Section 4.4 of this Final Program EIR) for additional information on this issue.

**Comment V9:** Mr. Edwards states the No Comprehensive Dust Control Program appears to be the best immediate option because it conserves resources until the SLOAPCD and CARB buy into the best mitigation programs.

Response to Comment V9: Draft Program EIR Section 12.3.2 describes the No Comprehensive Dust Program Alternative referenced in Comment V9. As described in the Draft Program EIR (page 12-9), this alternative consists of "an interim series of dust control projects, which, for the purposes of this alternatives analysis, would consist of approximately 40 acres of seasonal dust control measures such as wind fencing, straw bales, or PREs." The Draft Program EIR concludes the No Comprehensive Dust Program Alternative would substantially reduce and/or avoid most of the proposed Program's significant impacts but would only obtain some of the basic objectives set for the Program.

**Comment V10:** Mr. Edwards states the proposed Dust Control Program likely must comply with Assembly Bill 2616 and requests the OHMVR Division add a section to the Draft Program EIR to discuss the new law.

Response to Comment V10: As described in Section 2.4 of this Final Program EIR, Assembly Bill 2616 does not amend Chapter 3, Coastal Resources Planning and Management Policies, of the Coastal Act, which as explained in Draft Program EIR Chapter 5 is the standard of review for the Dust Control Program CDP permit. As such, Assembly Bill 2616 is not significant new information that changes the findings of the Draft Program EIR. Nonetheless, the proposed Dust Control Program would not alter visitor access levels and does not have the potential to result in the unfair treatment of any person.

**Comment V11:** Mr. Edwards requests the OHMVR Division identify potential violations of CDP 4-82-300, as amended, at Oceano Dunes SVRA.

Response to Comment V10: The OHMVR Division directs the commenter to Draft Program EIR Section 2.2.4.2, which describes CDP 4-82-300 (as amended), explains how the OHMVR Division continues to manage Oceano Dunes SVRA in compliance with this permit (i.e., is not in violation of this permit as the commenter suggests), and states, "The OHMVR Division is not proposing to perform any activities that would change compliance with existing CDP 4-82-300 conditions, as amended."

**Comment V12:** Mr. Edwards reiterates that past dust control measures have had limited results, the No Comprehensive Dust Control Program is a better use of resources, and the entrance to Oceano Dunes SVRA should be relocated to the Phillips 66 refinery.

Response to Comment V10: Refer to the responses to V3, V9, and V6 above.

# COMMENT LETTER "W"

Mr. Ronnie Glick, Sr. Environmental Scientist Oceano Dunes SVRA

Re: Comments on Oceano Dunes SVRA Draft Environmental Impact Report

Dear Mr. Glick,

I would like to submit the following comments on the Draft Environmental Impact Report released August 1, 2016. I will deliver a hard copy to your office today.

# 1. S. 1 Project Description

The Project Description does not include any information about the size of the problem the proposed activities are supposed to address. The decision makers would be better informed and able to better assess the potential effectiveness of these measures if the actual PM10 dust plume were described. To my knowledge, the plume is more than 2 miles wide and travels inland up to 12 miles. See attached diagram from the 2012 Community Monitoring Project. Further, the project description does not mention Dust Rule 1001 which is the impetus for this program.

W1

#### 2. S.1.1 Program Area

The Program Area does not include the dimensions of the La Grande tract, and the fact that it is County owned land, identified as a non-riding "buffer area" in the county Local Coastal Plan. See attached Figure 4. Using the ½ mile post markers as a guide, La Grande tract is approximately 1 1/2 miles long and 1/2 mile wide. In order to judge the potential for actual mitigation of the emissions, a reasonable person would need to consider the area emitting (approx... 3/4 sq. miles) and the measures being proposed (approx. 100 acres over five years). One square mile equals about 640 acres. The proposed mitigation is a) mostly in non-emitting areas and b) equals less than 20% of the source of the dust plume.

W2

3. S. 1.1 Targeting the CDF monitor should not be the purpose of the project. Bringing down the dust level over the entire range of the plume to the background level should be the purpose. Your consultants, did not appear to understand that thousands of people are affected by the crystalline silica particles produced by the recreation in the OHV Park.

W3

4. S.1.1 Avoiding U.S. Fish and Wildlife Service designated critical habitat for the western snowy plover is given as the reason for not mitigating within 1500 feet of the high tide mark. This is misleading and erroneous because as the seasonal least tern and snowy plover exclosure

demonstrates, these birds nest and live much closer to the shore. Further, the attached OHV handout titled "Protect These Birds and your Recreational Opportunities" states in paragraph 2, "These birds are sensitive to disturbances by people and dogs". And "Young chicks roam the beach in search of food and travel to and from the surf line both day and night." So, reducing the number of campers and vehicles would actually help the birds survive.

W4

# 5. S.1.1.1. Proposed activities in the Program Area

public's exposure to crystalline silica year around.

The proposed activities omits the least expensive and least disruptive alternative which would be to discontinue disturbance on all or a significant portion of La Grande tract. If this is "critical habitat" for a threatened species, eliminating the over use of this area, and allowing the natural vegetation to return naturally is the logical approach. Installing and removing fencing during the breeding season most likely affects the birds as there are big machines involved.

W5

- Planting approx... 20 acres of native vegetation This is too little and non-specific as to the location.
- 40 acres of seasonal dust control measures The effectiveness of this method is
  questionable and the fact that it is not permanent defeats the purpose of reducing the

W6

• Potentially planting trees downwind – No previous study has validated any usefulness in planting trees downwind. Obviously, as the planting location is right in front of the CDF monitor, the object is to further interfere with the monitor by planting something tall enough and dense enough to affect the readings. Anecdotal comments that the dust increased when local eucalyptus trees were removed, fail to consider that over the same time period, vegetation was destroyed in the La Grande tract as OHV riding activity increased dramatically. Tree planting downwind of the SVRA will not control or minimize dust emissions, as the trees are not in the emissive area. This activity is misleading in many ways not the least of which is the proposed location.

\//7

 Deploying dust and meteorological monitoring equipment - This has been done for the past four years and has not resulted in any significant change to the OHMVR division's approach of targeting the monitor. Further, the OHV Park is required to monitor the dust emissions under the 2008 Soil Conservation Standards and their own Strategic Plan, page 50, Goal 1.5 By 2014, implement a dust monitoring and management program with the aim of reducing the amount of dust generated by OHVs.

M8

• Preventing track out of sand onto Grand Ave - These notched concrete receptacles should be installed in the asphalt roadway, not in the sand slope leading down to the beach. The diagram seems to show them in the sand, which would be 1) hard to keep free of sand washed in with a high tide, 2) might be a traffic hazard, if vehicles are caught in soft sand waiting for the vehicle in front of it to move onto the grates 3) will cause sound and vibration which might disturb the wildlife and residents.

WS

### **Chapter 2 Project Description**

"Recreation in the SVRA produces PM 10 emissions by disturbing surface sands in the dune "play area" according to the 1994 ODSVRA General Plan Amendment. The first sentence of the description, gives no indication that this pollution is caused by the recreation in the SVRA, which has been known for more than 20 years and further validated by recent studies. That sentence should be changed to accurately describe the source of the dust problem so it may be addressed effectively.

W10

## 2.1 Dust Control Program Objectives

Item #1 again, fails to identify the actual cause of the dust generation and instead blames it on "saltation".

Item #3 should be Item #1, and read "Control and Reduce the PM generated by the recreation in the SVRA to no more than 20% above the background or "natural" levels as measured at the control monitor site (Oso Flaco) in compliance with San Luis Obispo County Air Pollution Control District Rule 1001.

W11

Items #4 and #5 do not pertain to the dust control project. Maintaining public access routes and OHV recreation opportunities do not belong in the list of "Control Program Objectives". Vehicle impacts on the natural vegetation and dune structure has been identified as the major cause of the dust problem. OHV management of the riding area and non-riding areas does not protect the resources and does not comply with the Coastal Commission permit as well as other laws and regulations pertaining to management of an OHV park, such as the OHMVR Act. And 2008 Soil Conservation Standards.

#### 2.2.1 Location and Access

Figure 2.1 incorrectly identifies the La Grande tract as part of the Oceano Dunes SVRA. The rectangular northern most portion of the figure, is San Luis Obispo County owned land, which could be returned to non-riding area at any time. See attached Figure 4 from the South County Coastal Plan.

W12

#### 2.2.2 Dune Setting

This description again fails to identify the loss of the fore dunes and back dunes on the La Grande tract as the cause of the PM 10 emissions. The attached map Fig. 8 shows (in grey) the vegetation lost. Per the CDP, "Vegetation whether fenced or unfenced is off limits to riding". Most of the vegetation gains were in non-riding areas like the Pismo Dune Preserve and around Oso Flaco Lakes or inside a fenced island. The notion of "no net loss of vegetation" was always in conflict with the Coastal Commission provisions and the Calif. Code of Regulations, section 4306, prohibition on destruction of vegetation. See the attached photos of natural dunes compared to riding area dunes.

#### 2.2.3 Page 2-6

The first paragraph again fails to describe the size of the dust plume, which reaches 12 miles inland. It is misleading in that it implies that wind generated dust and the loss of eucalyptus trees are the problem rather than denuding of the dunes. See the attached photos of natural dunes compared to riding area dunes.

W14

#### 2.2.4 Table 2-1, Figures 2-2, 2-3, 2-4, 2-5

The La Grande Tract, intended to be non-riding "buffer area" is again incorrectly included in the Oceano Dunes SVRA. The actual Oceano Dunes SVRA riding area is about 850 acres. All of these figures, misidentify the County owned land as part of the SVRA. Further, the top 30% approximately of the tract is not included in the project, when it is the most emissive area.

W15

#### 2.2.4.4 pg. 2-10

In paragraph 2, it reads, "Amendment 5 to this CDP, approved in 2001, sets an interim limit of 1,000 overnight camping units at Oceano Dunes SVRA (defined as one street-legal vehicle that enters the park under its own power), although the permit limit does not apply on Memorial Day, July 4th, Labor Day, and Thanksgiving. This is incorrect, in 2005, the Sierra Club and the State Parks Dept. entered into a Consent Decree which eliminated these "bump days", so that the permit limit is in effect 365 days per year. See exhibit 9.

W16

## 2.3.1.1 Basis for Dust Control Program Area

Page 2-20 first paragraph explains why the northern portion of the La Grande tract was not included "because they were considered substantially more north of the optimum trajectory for the wind path to CDF." As previously mentioned, mitigating only in areas, targeting the CDF monitor is inappropriate. Further, the schools noted did in fact show elevated levels of particulate matter, which corresponded to the levels at the Mesa 2 monitor. As there are no "safe" levels for particulate matter, and as children are considered especially affected by it because they run around and breathe faster and weigh less than adults, this cavalier attitude toward public health is certainly callous and irresponsible. By the way, there is a child care center at Lopez High School.

W17

#### 2.3.2.1 Vegetation Planting

Paragraph 2 states the establishment of vegetation in areas where no vegetation presently exists is less likely because it is more difficult due to wind exposure. In the 2007 Calif. Geological Survey report commissioned by the ODSVRA, State Parks was told, 1) establishing fore dunes first, then planting inland was recommended. 2) On pgs 90 -94, it describes how in 1989-93, in the Oso Flaco lake area, State Parks, did build fore dunes, and replant the area to stop sand from filling up the lakes. 3) the report recommended rotating riding areas. 4) On page 10, the report described the fore dunes in the Western Snowy Plover exclosure beginning to self- restore as soon as the protective fence was erected; then being destroyed by vehicles after Oct. 1<sup>st</sup> when the fence is removed. See attached pages .

## 2.3.3 Dust Control Siting Considerations

Resource Management – The protection of the Least Tern and Snowy Plover was non-existent, prior to 2005 when that Consent Decree mentioned earlier was enforced. Park Management continues to show a callous disregard for these species by not following the Scientific Sub-Committee's repeated requests for a year around study of the exclosure. Annually, the plants and wrack in the nesting exclosure are destroyed by vehicle traffic in Oct, Nov, Dec., Jan., and Feb. when it is open to the public. The arriving pairs of terns and plovers have no food source for themselves and their chicks. Park management "fix" this problem, by hauling in wrack and insects to distribute over the 200+ acres before March 1st. Further, management does not stop the disturbance of these species by illegal fireworks, night riding, and not enforcing the setback of 100 feet from the fencing. Looking at that exclosure, one can see, it is not 1100 feet from the surf line. Therefore the argument that nothing can be planted in the first 1100 feet is not for the birds, it is for the campers and vehicles benefit.

W19

Recreation Management - Ironically, the failure of the OHV park management to control intensity of use, destruction of vegetation and dune structure, and increasing the density of campers/users year after year, created this problem. And now they are worried about minimizing the loss of beach camping and motorized recreation lands. "The OHMVR Division would therefore avoid planting vegetation as much as possible within the Oceano Dunes SVRA open riding and camping area in order to minimize loss of beach camping and motorized recreation lands. Obviously, had the original vegetation remained and grown over 30 years, the dust pollution problem would not have occurred, and there would be a totally different camping and riding experience. Restoration of the natural resources is part of the Coastal permit for this park. See CC letter to Zilke. Rather than worry about a few lost acres, the consultants should be figuring out how to solve the problem as quickly and inexpensively as possible. Wait, they already did, in the Desert Research Institute Stage 1 pilot Project report, March 2011 the scientists identified these potential control measures: 1) Add artificial roughness (straw bales) 2) Add vegetation or enhance natural vegetation 3) stabilize the surface using straw bales 4) reduce surface disturbance by restricting vehicle access 5) create artificial dunes using sand fences 6) stabilize the surface using a cover of material. See attached report, executive summary. Vegetation and reducing vehicle disturbance were the least expensive. See exhibit 11, chart on page 15.  $\perp$ 

W20

# Figure 2-6 and 2-7 Track out Prevention

These figures do not seem to correspond to the location described in paragraph 2 of 2.3.2.6 which is the roadway. These figures show the concrete panels in the sloping sand leading down to the beach. It might be hard to keep the grates clean, if the high tide comes in a fill them with sand. Further, vehicles may get stuck in the sand, while waiting to cross the concrete panels. Safety issue.

W21

# Figure 2-8 Dust Control Program – Preferred Scenario

The long pink area described as "High Biological Sensitivity Area" is actually a huge parking lot for RV's, and vehicles of all sizes and shapes. Were it treated as highly biologically sensitive, there would be no need to fence in birds and vegetation to protect them from death and destruction. Compared to Figure 2-9, this is an inadequate plan as it does not add much vegetation to the La Grande tract, or elsewhere where it is missing.

Figure 2-9 Dust Control Program – Alternate Scenario

This plan at least attempts to fill in the gaps where the vegetation was destroyed. If you look at marker 3 and below marker 8 you will see the fore dunes actually naturally occur closer to the ocean surf line. Fore dunes are missing in this diagram. They are important to shelter the new vegetation inland.

W23

#### 2.3.4.1 Preferred Dust Control Scenario

The stated reason for the preference of this scenario is to minimize the loss of OHV recreational lands. By not basing the preference on the main objective (meeting the Rule 1001 criteria of not exceeding the background PM 10 levels by more than 20 %) this preference is not logical or defensible. It should be preferred based on the effectiveness in reducing the air pollution produced. Involves planting 35 acres in the La Grande tract which is riding and camping area.

W24

#### 2.3.4.2 Alternate Dust Control Scenario

This scenario involves planting 70 acres in the riding and camping area. It is described as the "worst-case impact to public recreation lands at Oceano Dunes SVRA. This is not really correct, as the worst-case scenario would be closing the area to all motorized use, as was done in Clear Creek Management Area in 2008. The problem the U. S. EPA discovered there was naturally occurring asbestos in the rocks, which was crushed by OHV's and became airborne by OHV traffic. Riders could inhale it and be affected by the known carcinogen. The particulate matter coming from the Oceano Dunes SVRA is mostly crystalline silica, also a known carcinogen. This analysis of the alternate scenario, should be concentrating on the amount of PM10 and 2.5 it would eliminate from the air, instead of the impact to recreation.

W25

## 2.4.1 Dust Control Program Annual Review

According to the timeline described, June 1, 2017 would be the start of the planning for the dust control projects. Actual planting in the dunes, would not occur until 365 days following Oct. 1, 2017 if I understand the process. This means on Nov. 16, 2018 the actual work begins. Considering that the dunes will start to self-restore immediately once disturbance ceases, it would be wise to begin the dust control measures, by simply preventing riding on the most emissive acres immediately. That way, riders would see where vegetation will be and change routes accordingly.

W26

# Chapter 3 Impact Analysis Methodology

In the last sentence of the first paragraph of 3.4.3, the area is characterized as having "very high sand blowing hazard". This is incorrect in that it implies that the high particulate levels coming from the OHV Park, are the same as those in other parts of this Dune Land unit. In reality, the air quality in the Pismo Dune Preserve, or around Oso Flaco Lakes is not emitting this air pollution (crystalline silica) to any appreciable degree. In fact, the Oso Flaco monitor is used to determine what the background levels of PM would be absent the OHV activity.

The 2008 Soil Conservation Standards, section vaguely referred to in the second paragraph, actually reads

"Off-highway vehicle (OHV) recreation facilities shall be managed for Sustainable long-term prescribed use without generating soil loss that exceeds restorability, and without causing erosion or sedimentation which significantly affects resource values beyond the facilities. Management of OHV facilities shall occur in accordance with Public Resources Code, Sections 5090.2, 5090.35, and 5090.53. "

This park is causing erosion which significantly affects resource values beyond the facilities. On page 14 the report notes

o General mitigation measures may be needed at an OHV area for dust control.

o Naturally occurring minerals such as asbestos and silica may be exposed on ground surfaces at an OHV facility. There is a potential for OHV activity to disturb these minerals. When airborne, these minerals can be a health concern. Mitigation measures to control the airborne release of these minerals may be needed.

The Public Resource Code cited 5090.2 requires

"(4) When areas or trails or portions thereof cannot be maintained to appropriate established standards for sustained long-term use, they should be closed to use and repaired, to prevent accelerated erosion. Those areas should remain closed until they can be managed within the soil conservation standard or should be closed and restored.

If the Oceano Dunes SVRA actually followed the PRC, portions of La Grande Tract would be closed to use and repaired to prevent accelerated erosion.

These are examples of how the authors of this DEIR select what portions of the pertinent laws and codes they wish to refer to and follow.

#### 3.4.8 Public Services

This paragraph states that the plants, materials and structures needed to implement the Dust Control Program could pose collision risks to OHV enthusiasts. Obviously, that is why the PRC states areas should be closed to use and repaired. 3.4.8 goes on to state that the reduction of recreation opportunities for restoration would increase the rider concentration and the possibility of vehicle to vehicle or vehicle to pedestrian collisions. This possibility should be considered and evaluated by law enforcement, along with the track out receptacles potential for accidents. Public services, especially rescue/fire services, San Luis Obispo County Sheriff and Calif. Highway Patrol should all be consulted on these issues. Also, adjustment to the number of OHV riders allowed in the area should also be considered and evaluated.

W28

I have run out of time to comment on Chapters 4 thru 12 in detail, so I will just make these observations.

#### Chapter 5 Land Use and Planning

Throughout this chapter, the authors neglected to identify the La Grande Tract, the most emissive area, as being owned by the County of San Luis Obispo and not by State Parks.

W30

#### **Chapter 6 Aesthetics**

6.2.1 third paragraph notes that in the SVRA "Unstabilized dunes are mostly within the OHV riding area." What is not mentioned is that the riding itself is what has de-stabilized the dunes and destroyed the vegetation.

## Chapter 12 Alternatives

#### 12.1.1 Summary of Project Objectives and Significant Effects

- 1) Again, this objective should read "Control and Reduce the PM generated by the recreation in the SVRA to no more than 20% above the background or "natural" levels as measured at the control monitor site (Oso Flaco).
- 2) Reducing concentrations at one monitor is not an appropriate objective. October 1, 2016 the 24 hour PM10 (BAM) readings for all three monitors on the Nipomo Mesa, exceeded the State of Calif. Standard of 50 micrograms. CDF was 145.9; Mesa 2 was 89.5 and Nipomo Regional Park was 71.0 . This demonstrates the size of the plume, as the Nipomo Regional Park is about 6 miles away from the SVRA.
- 3) This objective is unnecessary and is not being followed in the DEIR process. 4 and 5) do not pertain to a Dust Control Program.

# 12.2 Alternatives Considered But Rejected

I do not have time to comment on this analysis except to say that the authors apparently were not aware that the dunes "self-restore" when not disturbed by vehicle traffic.

W32

Several alternatives were not considered, I'll describe them briefly.

#1 Follow Figure 4 and return La Grande Tract to a "Buffer area". Simply, return the fence line to that shown on the map and let the dunes "self-restore". Cost – moving of the fence. Impact to camping and driving on the beach, none. Impact to OHV riding area, reduced to its original size. At a later time, the buffer area may be opened to limited non-motorized activities if appropriate.

W33

#2 Follow the Public Resource Code and close and repair the emissive areas. Obviously, the places where vegetation used to be are the best starting point. See attached Exhibit D from the coastal permit. Cost – fencing and planting. Impact to camping, may be reduced if it is occurring in previously vegetated area. Impact to driving on the beach, none. Impact to OHV riding area, reduced by size of vegetation that will be restored. This option currently occurs in other OHV parks

#3 Follow the provisions of the Coastal permit #4-82-300 and place fencing 100 feet away from all vegetation islands and restore vegetation shown in Exhibit D. Ensure that recommendations from the 2015 Calif. Coastal Commission annual review are incorporated such as identifying appropriate use limits and carrying capacities and completion of the Habitat Conservation Plan. See attached report.

W35

#4 Review and evaluate the recommendations of Dr. Melvin D. Zeldin, Environmental Consultant which are presented in a letter to APCD Ex. Director, dated January 21, 2015 and included in the above named annual review.

W36

#5 Follow the options for creating fore dunes described in the ODSVRA 2001 Wildlife Habitat Protection Plan, August 2001 cited in Exhibit 14 of the annual review. Excerpt below.

"This information is from the ODSVRA Wildlife Habitat Protection Plan, August 2001, p. 22. 8 The six options are:

- 1. Fence 1 to 5 acre fore dune areas utilizing sand barriers/fences to trap the sand and gradually build up the dunes and actively revegetate with native plants.
- 2. Fence ¼ to 1-acre fore dune areas utilizing sand barriers/fences to trap the sand and gradually build up the dunes and actively revegetate with native plants.
- 3. Fence ¼ to 5-acre fore dune areas and allow both vegetation and sand to grow and /or move naturally.
- 4. Construct artificial sand dunes with heavy equipment between  $\frac{1}{4}$  to 5 acres in size before fencing and revegetating.
- 5. Fence and revegetate a minimum ¼ acre utilizing sand barriers/fences to trap the sand and gradually build up the dunes to duplicates the original fore dune system (aligned with the prevailing wind direction).
- 6. Use heavy equipment to reduce the height of existing sand dunes 1.5 feet in front of the slack dune vegetated islands. The sand would then be pushed north or south of the islands and allowed to move down-wind naturally away from the vegetated islands.

Three control/comparison areas were identified: the Dune Preserve north of pole 3, the protected fore dune area south of pole 8, and areas of existing OHV use.

Exhibit 14

4-82-300 (ODSVRA Review)

Thank you for the opportunity to submit comments. I request a written response to my comments, via email.

Sincerely,

Rachelle Toti

#### List of Exhibits

- 1) Community Monitoring Report, plume dimensions
- 2) Figure 4 diagram
- 3) Protect These Birds handout
- 4) Goal 1.5 OHV Strategic Plan
- 5) Page VII-3 of the 1994 ODSVRA General Plan
- 6) Figure 8 map
- 7) Sec. 4306 of the Calif Code of Regulations
- 8) Photo of natural dunes and riding area
- 9) Page 9 of Consent Degree
- 10) Pages 10 and 90 thru 94 of 2007 Vegetated Islands report
- 11) Page 15 of Desert Research Institute 2011 Stage 1 Pilot Project Report
- 12) Page 14 of 2008 Soil Conservation Standards
- 13) Exhibit D from 2015 Coastal Commission Staff Report
- 14) 2015 Dr. Zeldin Letter
- 15) 2007 Coastal Commission letter to Andy Zilke

# 4.23 RESPONSE TO COMMENTS FROM RACHELLE TOTI (OCTOBER 3, 2016)

The OHMVR Division received 37 comments from Rachelle Toti. In general, these comments were related to existing conditions present in and near the proposed Dust Control Program area, the Draft Program EIR's content and findings, and the Draft Program EIR's evaluation of alternatives to the proposed Program. Ms. Toti also submitted Exhibits 1 – 15 with their comment letter. These exhibits, which comprised more than 400 pages of material, contained information and evidence referenced in Ms. Toti's main comments on the Draft Program EIR. The OHMVR Division has reviewed these exhibits and concluded they do not constitute significant new information, nor do they substantially change the EIR's analysis and conclusions regarding the potential impacts of the proposed Dust Control Program. Ms. Toti's Exhibits 1 – 15 are not reproduced in this Final Program EIR, but are available for review at the Oceano Dunes District Office (340 James Way, Suite 270, Pismo Beach, CA 93449), Oceano Dunes SVRA Ranger Station (928 Pacific Boulevard, Oceano, CA 93445), and OHMVR Division Headquarters 1725 23<sup>rd</sup> Street, Sacramento, CA 95816) during normal business hours.

**Comment W1:** Ms. Toti states Draft Program EIR Section S.1 does not include any information about the size of the dust problem and does not mention the impetus for the proposed Dust Control Program, which is Rule 1001.

Response to Comment W1: Draft Program EIR Section S.1. was prepared in accordance with CEQA Guidelines Section 15123, which specifies that an EIR shall contain a brief summary of the proposed action and its consequences in language that is as clear and simple as reasonably practical. As explained in the response to CCC Comment C5 (see Section 4.3 of this Final Program EIR), the Draft Program EIR discloses the most current scientific information regarding dust emission potential at Oceano Dunes SVRA and provides a discussion of scientific and environmental factors that provide the basis for the proposed Dust Control Program area. Specifically, Draft Program EIR page 1-6 presents a summary of the SLOAPCD's 2013 South County Community Monitoring Report, which is the source of the figure provided by the commenters. Thus, this figure does not constitute significant new information. Refer also to the responses to SLOAPCD Comments D2, D3, D4, D9, D12, and D13 (see Section 4.4 of this Final Program EIR) for additional information regarding this topic.

**Comment W2:** Ms. Toti states Draft Program EIR Section S.1.1 does not include the dimensions of the La Grande Tract and states the proposed level of dust control is located in mostly non-emitting areas and equals less than 20% of the source of the dust plume.

Response to Comment W2: As a point of clarification, the La Grande Tract, which constitutes a series of parcels owned by SLO County, constitutes approximately 585 acres in size, nearly 53% of which (313 acres) is located within the proposed Dust Control Program area. But, regardless of the size of the La Grande Tract, the commenter oversimplifies and misrepresents the dynamics of dust generation at Oceano Dunes SVRA by implying the La Grande Tract is 100% responsible for dust generation and other areas are "non-emitting." As explained in the response to CCC Comment C8 (see Section 4.3 of this Final Program EIR), emissions vary throughout the dune system (both riding and non-riding areas). It is true that some important tests and studies have generally concluded the highest levels of dust emission potential and PM10 concentrations occur in the central to northern portion of the Oceano Dunes SVRA open riding and camping area (i.e., the La Grande tract). Accordingly, Draft Program EIR

Sections 1.1 and 2.3.1.1 identify that the primary Program area includes the La Grande Tract, which studies have identified as the area most likely influencing air quality measurements at the SLOAPCD CDF station and the air quality conditions on the Nipomo Mesa. Refer also to the response to SLOAPCD Comments D2, D3, D4, D9, D12, and D13 (see Section 4.4 of this Final Program EIR) for more information regarding this topic.

**Comment W3:** Ms. Toti states the purpose of the proposed Dust Control Program should not be to target the CDF monitor and that OHMVR Division consultants do not understand that thousands of people are affected by the dust issue.

response to Comment W3: As described in the response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), none of the dust studies conducted at Oceano Dunes SVRA to date describe the level of dust control necessary to achieve compliance with the Rule 1001 performance standard or reduce dust levels to "background" conditions. Even the SLOAPCD, in its comments on the Draft Program EIR, acknowledges that the magnitude of emissions reductions, as well as the areas where mitigation will be most effective, is still being evaluated (see response to Comment D2 in Section 4.4 of this Final EIR). The uncertainty surrounding the magnitude of dust control measures needed to comply with the Rule 1001 performance standard is a major reason why the OHMVR Division has set forth clear and flexible objectives for the proposed Program (e.g., see Draft EIR page 2-1, objective 3, to "make ongoing and best possible progress toward compliance with SLOAPCD Rule 1001 performance standard"). Importantly, the clear and flexible objectives set for the proposed Program do not preclude achieving compliance with the Rule 1001 performance standard. Second, the OHMVR Division notes that reducing concentrations at the CDF monitor would be a demonstrable means of demonstrating that concentrations on the Nipomo Mesa in general have also been reduced. For example, the SLOAPCD's 2013 South County Community Monitoring Project referenced by the commenter in Comment W1 identifies that "The very highest concentration areas are consistently in the vicinity of the District's permanent CDF monitoring station, with slightly lower concentrations to the north and south (SLOAPCD 2013, page 11)." Thus, reducing PM levels at the CDF monitoring station should also reduce PM10 levels on the Nipomo Mesa in general. Finally, the OHMVR Division and its consultants are aware there are citizens and communities located downwind of Oceano Dunes SVRA. The Draft Program EIR clearly articulates this on page 1-1, which states, "An ambient air quality monitoring station (the "CDF" station) operated by the SLO County Air Pollution Control District (SLOAPCD) is located downwind of the SVRA, on the Nipomo Mesa, as are residential areas."

**Comment W4:** Ms. Toti states the Draft Program EIR is misleading and erroneous because it identifies that USFWS-designated critical habitat for western snowy plover is the basis for setting the proposed Dust Control Program area back from the Pacific Ocean. Ms. Toti provides information indicating western snowy plover and California least tern nest much closer to the shore and can be impacted by people and dogs. Ms. Toti states reducing the number of campers and vehicles would actually help these species survive.

Response to Comment W4: The Draft Program EIR is not misleading or erroneous regarding the basis for the proposed Dust Control Program area.

First, Draft Program EIR Section 7.2.2.2 describes the USFWS has designated a portion of the habitat suitable for western snowy plover present at Pismo State Beach and Oceano

Dunes as "critical habitat." The location of this critical habitat area is depicted on Draft Program EIR Figure 2-5 and new Figure 7-2 (see Chapter 3 of this Final Program EIR). As described in more detail in the response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), critical habitat areas at Pismo State Beach and Oceano Dunes SVRA contain the physical and biological features essential to western snowy plover (see Section 2.1 of this Final Program EIR). Accordingly, planting vegetation in critical habitat/near shore areas would alter these essential physical and biological features and could increase the risk of western snowy plover predation during nesting, foraging, and/or roosting if plovers are not able to detect approaching predators. As a result, planting vegetation in the near shore areas could result in a significant impact to western snowy plover, which is why the OHMVR Division has designed the proposed Dust Control Program area to avoid critical habitat for this species.

Second, as identified in the information referenced by Comment W4, human activity at Pismo State Beach and Oceano Dunes SVRA, including vehicular and non-vehicular recreation, is part of the physical environmental conditions that constitute the EIR's baseline conditions against which the proposed Program is being evaluated. This does not mean these existing activities do not have the potential to influence the environment. As explained in the response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR) and Sierra Club Comment I4 (see Section 4.9 of this Final Program EIR), unmanaged human activity at Pismo State Beach and Oceano Dunes SVRA, including camping and OHV activity, may affect western snowy plover and California least tern reproductive success. But, importantly, the OHMVR Division actively manages the SVRA to enhance and protect these species' nest sites.

Finally, the OHMVR Division is not proposing changes to any camping or visitor limits established by CDP 4-82-300, as amended, as part of the proposed Dust Control Program. Such considerations are outside the scope of the OHMVR Division's environmental review of the proposed Program.

**Comment W5:** Ms. Toti states the proposed Dust Control Program omits the least expensive and least disruptive alternative which would be to discontinue disturbance on all or a significant portion of the La Grande Tract.

Response to Comment W5: The Draft Program EIR is not misleading or erroneous regarding the basis for the proposed Dust Control Program area. Draft Program EIR Section 12.2.3 evaluates a Reduced OHV Use Alternative in which the OHMVR Division would voluntarily restrict the size of the area open to vehicular recreation at Oceano Dunes SVRA. The text indicates vehicle use restrictions are not likely to be as effective at reducing saltation and associated dust production at Oceano Dunes SVRA as the proposed Dust Control Program activities and further concludes the alternative would not obtain most of the basic objectives set for the proposed Program nor avoid or substantially lessen the proposed Program's significant and unavoidable impacts. Accordingly, the OHMVR Division has rejected this alternative from more detailed consideration. Refer also to the response to Comment D12 (see Section 4.4 of this Final Program EIR) for additional information on this issue..

As a point of clarification, the USFWS-designated critical habitat area for western snowy plover only slightly overlaps the westernmost portion of SLO County's La Grande Tract.

**Comment W6:** Ms. Toti states the proposed vegetation plantings are too little and non-specific and that the effectiveness of 40 acres of seasonal dust control measures is questionable. Ms. Toti

also states seasonal dust control measures only reduce the public's exposure to dust for a part of the year.

Response to Comment W6: The commenter's opinion on the size of the proposed vegetation plantings (20 acres per year) is noted. The commenter is correct that the Draft Program EIR does not identify the specific locations for vegetation plantings; however, as explained in the response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), this is because there is uncertainty regarding the magnitude and location of dust control measures needed to reduce PM10 concentrations consistent with Program objectives. The proposed Dust Control Program, as described in the Draft Program EIR, represents the OHMVR Division's best approach to dust control and is based on the latest scientific information that has been investigated and agreed upon by the OHMVR Division and CARB and can be feasibly implemented in a reasonable timeframe with available funding, staffing, and environmental, logistical, and technical resource constraints.

With regards to seasonal dust control measures, the OHMVR Division disagrees that the effectiveness of this method is limited or questionable. As explained in more detail in the response to CCC Comment C6 (see Section 4.3 of this Final Program EIR), studies conducted at Oceano Dunes SVRA have shown seasonal dust control measures are capable of achieving a 73% to 87% reduction in sand transport inside the array and a 37% reduction in PM10 concentrations immediately downwind of the array (as compared to upwind concentrations), which is a substantial reduction when compared to open sand areas. The commenter is correct seasonal dust control measures would not be permanent; however, they could be in place from approximately March 1 to September 30, or the 7 months of the year in which Oceano Dunes SVRA is most often exposed to strong and frequent prevailing winds from the northwest.

**Comment W7:** Ms. Toti states no previous study has validated the usefulness of planting trees downwind to control or minimize dust emissions.

Response to Comment W7: Draft Program EIR Section 2.3.2.3 states, "Planted trees would take time to grow and thus improved air quality conditions may not be fully or even partially achieved within the five-year period covered by this EIR; however, the planting of trees may provide longer-term dust benefits and become part of a longer-term dust control strategy implemented by the OHMVR Division in the future." Thus, the Draft Program EIR recognizes the efficacy of this measure is not certain and does not take credit for any near-term reductions associated with this activity.

**Comment W8:** Ms. Toti states previous monitoring has not informed or resulted in any significant change to the OHMVR Division's approach to dust control. The commenter also states the OHMVR Division is required to monitor dust emissions under its 2008 Soil Conservation Standards and 2009 Strategic Plan.

Response to Comment W8: The OHMVR Division disagrees that previous monitoring has not informed the OHMVR Division's approach to reducing dust. Draft Program EIR Section 1.1.3 summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA and which helped to form the basis for the proposed Dust Control Program. The proposed Dust Control Program would further monitoring efforts to evaluate the dust and PM10 emissions generated at Oceano Dunes SVRA. The commenter is correct the 2008 Soil Conservation Standard and Guidelines and 2009 Strategic Plan do generally identify guidelines and goals for monitoring dust and wind

transport of sediment. The proposed Program would, therefore would be consistent with the Strategic Plan and Soil Conservation Standard.

**Comment W9:** Ms. Toti states the grooved concrete panels should be installed in the asphalt roadway and not in the sand slope leading down to the beach. Ms. Toti states the proposed design would be difficult to keep free of sand, could be a traffic hazard if waiting vehicles sink into the soft sand while waiting to enter the track out device, and could cause sound or vibration that could disturb residents or wildlife.

Response to Comment W9: Comment W9 is consistent with the information and findings contained in the Draft Program EIR. First, as a point of clarification, the Draft Program EIR states (page 2-25), "The concrete panels would be between 50 to 125 feet in length, and would be located in the Grand Avenue and Pier Avenue roadways, potentially extending down the entrances' sand ramps." Thus, it is possible the final design may include new grooved concrete down a portion of the sand ramp entrances; however, as noted on Draft Program EIR page 7-24, the design of the track-out prevention devices would not be impacted by the Pacific Ocean. Furthermore, the Draft Program EIR states (page 2-24 to 2-25), "The greatest technical challenge is to develop a system that can deal with the quantities of sand expected to occur in the area. In addition to accommodating the sand that adheres to vehicles, the structural devices would need to function with the large quantity of naturally blowing sand from the beach area. The greatest logistical challenge is maintenance. Structural devices would need to be easy to use and would need to quickly remove sand attached to vehicles. In addition, the structures would need to accommodate a wide-array of vehicle types." Accordingly, the Draft Program EIR adequately evaluates potential vehicle queues and traffic back-ups (pages 4-20 and 5-18) and potential for increases in noise associated with maintenance (Draft Program EIR Impact NOI-1) and vehicles passing over the devices (Draft Program EIR Impact NOI-2).

**Comment W10:** Ms. Toti references the 1994 Oceano Dunes SVRA General Plan Amendment and states the first sentence of the Draft Program EIR project description gives no indication of the source of the dust pollution. Ms. Toti states the sentence should be changed so the dust issue may be addressed effectively.

Response to Comment W10: Comment noted. As explained in the response to Comment W2 above, the commenter oversimplifies the dynamics of dust generation at Oceano Dunes SVRA. The primary mechanism for dust generation and transport is the saltation process that is activated during certain wind conditions. Without wind, the saltation process would not be activated and dust emissions would not be transported downwind. The proposed Dust Control Program, as described in the Draft Program EIR, represents the OHMVR Division's best approach to dust control and is based on the latest scientific information that has been investigated and agreed upon by the OHMVR Division and CARB and can be feasibly implemented in a reasonable timeframe with available funding, staffing, and environmental, logistical, and technical resource constraints.

**Comment W11:** Ms. Toti expresses disagreement with the objectives the OHMVR Division has set for the proposed Dust Control Program.

Response to Comment W11: Comment noted. As explained in more detail in the response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), the OHMVR Division, as CEQA lead agency has developed objectives for the proposed Program that balance a variety of factors, a consideration expressly noted in CEQA and the CEQA Guidelines. The objectives the OHMVR Division has set forth for the proposed Program consider the

various public safety, recreation, and natural resource objectives the OHMVR Division must balance when considering whether to approve the proposed Program.

**Comment W12:** Ms. Toti states Draft Program EIR Figure 2-1 incorrectly identifies the La Grande Tract as part of Oceano Dunes SVRA, and submits Figure 4 from the South County Coastal Plan as evidence of this.

Response to Comment W12: Comment noted. The Draft Program EIR makes numerous references to the La Grande Tract and notes the primary Dust Control Program area consists of state-owned and state-leased lands. As a point of clarification, the OHMVR Division operates the part of the SVRA within the County's La Grande Tract under an existing operating agreement. This existing operating agreement provides the OHMVR Division with the existing authority to implement the proposed Dust Control Program. Nonetheless, as shown in Section 3.3 of this Final Program EIR, the OHMVR Division has revised Draft Program EIR text to explicitly state that the La Grande Tract is primarily owned by SLO County.

Comment W13: Ms. Toti states Draft Program EIR Section 2.2.2 fails to identify the loss of foredunes and backdunes and again refers to the La Grande Tract as the cause of the PM10 emissions. Ms. Toti submits evidence documenting the loss of vegetation that has occurred at Oceano Dunes SVRA. Ms. Toti also states the notion of "no net loss" of vegetation was in conflict with the Coastal Commission provisions and Section 4306 of the California Code of Regulations, and submits photo evidence comparing natural dunes to riding area dunes.

Response to Comment W13: Comment noted As explained in the OHMVR Division's response to Comment W2 above, the commenter oversimplifies the dynamics of dust generation at Oceano Dunes SVRA when referring to the La Grande Tract as "the cause of the PM10 emissions." The evidence submitted by the commenter documenting the loss of vegetation that has occurred at Oceano Dunes SVRA is not significant new information. The OHMVR Division directs the commenter to the last paragraph in Draft Program EIR Section 2.2.2., which discusses this CGS mapping analysis. Specifically, Draft Program EIR page 2-5 states, "Since the 1930's, the area has lost 254 acres of vegetation and gained 450 acres of vegetation, for a net gain of 196 acres. Most of the vegetation loss since 1930 occurred in a north-south trending line of vegetation islands approximately 0.4 miles from the shore." As explained in more detail in the OHMVR Division's response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the existing physical environmental conditions in the vicinity of the project constitute the baseline conditions by which a lead agency determines whether an impact is significant (CEQA Guidelines Section 15125). Accordingly, the Draft Program EIR focuses on the potential impacts of the proposed Program based on the existing vegetation patterns in the Program area.

As a point of clarification, Draft Program EIR page 2-5 incorrectly references a "no net loss of vegetation" policy at Oceano Dunes SVRA. As shown in Section 3.3 of this Final Program EIR, the OHMVR Division has deleted this text from the EIR.

**Comment W14:** Ms. Toti states Draft Program EIR Section 2.2.3 is misleading when it implies the loss of eucalyptus trees are the problem rather than the loss of vegetation on the dunes and references photos of "natural dunes" compared to riding area dunes.

Response to Comment W14: Comment noted. First, as a point of clarification, Draft Program EIR Section 2.2.3 does not imply the loss of eucalyptus trees is the source of the

dust problem, only that historical eucalyptus groves buffeted rural residences, to some extent, from windblown dust emissions. Second, the commenter does not provide a point of reference for the referenced photo comparing "natural dunes" with riding area dunes; however, presuming this photo is looking toward dunes located on private lands east of Oceano Dunes SVRA, the photo depicts a large, open sand area present immediately outside the riding area. Thus, OHV recreation could not be responsible for the lack of vegetation on this portion of the dunes. As described in Draft Program EIR Section 1.1.1, "Oceano Dunes SVRA is situated in the Guadalupe-Nipomo Dunes Complex, an approximately 18,000-acre, 18-mile-long coastal dune landscape that contains large, vegetated and unvegetated sand dunes subject to strong prevailing winds (see Figure 1-1). According to the California Geological Survey (CGS), Oceano Dunes SVRA is located within the youngest, most active formations of the dune complex, where winds transport sand and dunes are actively migrating inland several feet per year (CGS 2007)." Lastly, as explained in more detail in the OHMVR Division's response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the existing physical environmental conditions in the vicinity of the project constitute the baseline conditions by which a lead agency determines whether an impact is significant (CEQA Guidelines Section 15125). Accordingly, the Draft Program EIR focuses on the potential impacts of the proposed Program based on the actual, existing conditions in the Program area and not historical or other comparable areas outside the Program area..

**Comment W15:** Ms. Toti reiterates that the Draft Program EIR, in various places, incorrectly includes the La Grande Tract as part of Oceano Dunes SVRA. Ms. Toti states the top 30% of the La Grande Tract is the most emissive area.

Response to Comment W15: Refer to the OHVMR Division's response to Comment W12 above. In addition, the OHVMR Division directs the commenter to Draft Program EIR page 1-7, which states, "considering all data, i.e., temporary monitoring, PI-SWERL, and particle size data, [a] picture has emerged that generally describes the spatial variability of the PM10 emissions. The PM10 emissions measured with the PI-SWERL show a pattern that is corroborated by the temporary monitoring networks, with higher PM10 measurements [in the central to northern part of the open riding and camping area], being associated with areas that the PI-SWERL measurements have identified as having higher emission potential." In addition, Draft Program EIR Section 2.3.1.1 provides a discussion on the basis for selecting the proposed Dust Control Program area, stating, "The Program area includes most of the open sand areas in the central to northern portion of the Oceano Dunes SVRA open riding and camping area, commonly referred to as the "La Grande Tract." SLOAPCD and OHMVR Division studies have identified this area as the area most likely influencing air quality measurements at the CDF station and air quality conditions on the Nipomo Mesa."

**Comment W16:** Ms. Toti states Draft Program EIR Section 2.2.4.4 incorrectly states that the camping limit set by CDP 4-82-300, as amended, does not apply on Memorial Day, July 4<sup>th</sup>, Labor Day, and Thanksgiving. Ms. Toti states the 2005 Consent Decree between the Sierra Club and the OHMVR Division eliminated this provision.

Response to Comment W16: The commenter is correct. As shown in Section 3.3 of this Final Program EIR, the OHMVR Division has corrected the EIR's discussion of camping limits contained in Section 2.2.4.4. The OHMVR Division has been enforcing the vehicle limits on all days, including holidays, in conformance with a consent decree. This information does not change the content or findings of the Draft Program EIR.

**Comment W17:** Ms. Toti reiterates that targeting the CDF monitor is inappropriate and notes monitoring at schools near Oceano Dunes SVRA show elevated levels of particulate matter corresponding to levels at the SLOACPD Mesa2 air quality station. Ms. Toti states the OHMVR Division has a cavalier attitude toward public health and notes there is a child care center at Lopez High School.

Response to Comment W16: Refer to the response to Comment W3 above. As a point of clarification, the Draft Program EIR indicates monitoring at nearby schools showed particulate matter levels corresponded to other SLOAPCD air quality stations. Specifically, the commenter is directed to Draft Program EIR page 2-20, which states, "Air quality measurements conducted by the SLOAPCD at locations to the north of CDF, including Mesa Middle School and Lopez High School, either did not show elevated PM10 readings or were more comparable to the SLOAPCD's Mesa2 or NRP monitoring stations (SLOAPCD 2011, 2013a)." As explained in the response to Comment O2 (see Section 4.15 of this Final Program EIR), the proposed Program would improve air quality conditions at the CDF air quality station and the Nipomo Mesa.

**Comment W18:** Ms. Toti states the Draft Program EIR identifies that establishing vegetation where none presently exists is less likely because it is more difficult. Ms. Toti submits a 2007 CGS report as evidence that vegetation and dunes are capable of self-restoring.

Response to Comment W16: Comment W18 does not provide new, significant information for the OHMVR Division to consider. Draft Program EIR section 2.2.2. includes an excerpt from the same 2007 CGS study submitted by the commenter, and Draft Program EIR Section 2.3.2.1 describes the advantages and disadvantages of vegetation for dust control purposes, stating, "Although vegetation would take time to become established and could be hampered by environmental factors such as a short growing season, drought, hardiness of individual plants, etc., it has the inherent ability to respond and potentially stabilize dynamic dune conditions and reduce the need for regular and routine maintenance once the vegetation is established."

**Comment W19:** Ms. Toti states the OHMVR Division disregards the Scientific Sub-Committee's requests for year-round study of the nest exclosure, comments on existing activities that disturb western snowy plover and California least tern, claims the exclosure is not 1,100 feet from the surf line, and reiterates the proposed Dust Control Program area is set back from the Pacific Ocean for the benefit of campers and vehicles.

Response to Comment W19: First, comments on the Scientific Sub-Committee are outside the scope of the OHMVR Division's environmental review of the proposed Dust Control Program. Second, Draft Program EIR Section 4.2 and Section 7.2, Pismo State Beach and Oceano Dunes SVRA are very popular destinations that also happen to support several special-status species, including western snowy plover and California least tern. In particular, the parks provide nesting and breeding habitat for these two species. As explained in the OHMVR Division response to SLOAPCD Comment D13 (Section 4.4 of this Final Program EIR) and Sierra Club Comment I4 (see Section 4.9 of this Final Program EIR), unmanaged human activity at Pismo State Beach and Oceano Dunes SVRA, including camping and OHV activity, may affect western snowy plover and California least tern reproductive success. But, importantly, the OHMVR Division actively manages the SVRA to enhance and protect these species' nest sites. Third, as explained in more detail in response to Friends of Oceano Dunes Comment K3 (see Section 4.11 of this Final Program EIR), the location of the western snowy plover critical

habitat area depicted on Draft Program EIR Figure 2-5 and new Figure 7-2 (see Chapter 3 of this Final Program EIR) consists of GIS data provided by the USFWS via its critical habitat portal (USFWS 2012, 2016). This data indicates the critical habitat area extends approximately 1,100 feet inland from the Pismo State Beach western boundary and borders the northern extent of the proposed Dust Control Program area (between marker posts 4 and 5), but is approximately 240 feet west of the southern extent of the proposed Program area (near marker post 7). Thus, the proposed Dust Control Program area borders, but does not overlap with or otherwise include, USFWS-designated critical habitat for western snowy plover. Refer also to the response to Comments K3, K30, K32, K35, K40, K41, and K65 for additional information on this issue. Finally, as explained in more detail in response to Comment W4 above, planting vegetation in the near shore areas could result in a significant impact to western snowy plover, which is why the OHMVR Division has designed the proposed Dust Control Program area to avoid critical habitat for this species.

**Comment W20:** Ms. Toti expresses several opinions regarding the management of Oceano Dunes SVRA, speculates on the effect historical management activities have had on present day dust issues, and references a letter from the CCC regarding dune restoration activities required by CDP 4-82-300, as amended, as well as 2011 report prepared by DRI which outlines potential dust control measures.

Response to Comment W20: The commenter's opinions regarding the historical and present day management of Oceano Dunes SVRA are noted, but do not raise a significant environmental issue pertaining to the proposed Dust Control Program. Comment W20 does not provide new, significant information for the OHMVR Division to consider. Draft Program EIR Section 2.2.4.2 includes a discussion of CDP 4-82-300, as amended. As described in this section of the Draft Program EIR, the OHMVR Division enhances and protect dune habitat as required by CDP 4-82-300 and is not proposing to perform any activities that would change compliance with existing CDP 4-82-300 conditions, as amended. In addition, Draft Program EIR Section 1.1.3 summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA and which helped to form the basis for the proposed Dust Control Program, including the 2011 report by DRI referenced in Comment W20.

**Comment W21:** Ms. Toti reiterates concerns regarding the proposed track-out prevention devices.

Response to Comment W21: Refer to response to Comment W9 above.

**Comment W22:** Ms. Toti states the potential Dust Control Program implementation scenario graphically depicted on Draft Program EIR Figure 2-8 is inadequate because it does not add much vegetation to the La Grande Tract. Ms. Toti states the "high biological sensitivity" area depicted on this figure is actually a parking lot for vehicles.

Response to Comment W22: As explained in more detail in the response to CCC Comment C5 (see Section 4.3 of this Final Program EIR), the identification and graphical presentation (see Draft Program EIR Figures 2-8 and 2-9) of preferred and alternate Dust Control Program scenarios is intended to facilitate public understanding of the proposed Program and the OHMVR Division's evaluation of potential environmental effects associated with the implementation of the proposed Program. At this time the OHMVR Division has not selected any implementation scenario for the proposed Dust Control Program. Rather, the EIR identifies two possible scenarios for implementing the

proposed Dust Control Program and notes that the actual implementation would depend on air quality conditions, resource constraints, and logistical factors. The commenter's opinion regarding the "high biological sensitivity" area is noted, but does not raise a significant environmental issue with regards to the proposed Dust Control Program. Nonetheless as a point of clarification, the area depicted as a "high biological sensitivity" on Draft Program EIR figures does not just represent western snowy plover critical habitat but rather indicates suitable breeding habitat for western snowy plover and California least tern.

**Comment W23:** Ms. Toti expresses a preference for the potential Dust Control Program implementation scenario graphically depicted on Draft Program EIR Figure 2-9.

Response to Comment W23: The commenter's opinion is noted. Refer also to response to Comment W22 above.

**Comment W24:** Ms. Toti states the OHMVR Division's preference for the Dust Control Program implementation scenario graphically depicted on Draft Program EIR Figure 2-8 is not reasonable because it is not based on reducing air pollution.

Response to Comment W24: As explained in more detail in the response to CCC Comment C5 and W22 above, the OHMVR Division has not selected any implementation scenario for the proposed Dust Control Program. Rather, the EIR identifies two possible scenarios for implementing the proposed Dust Control Program and notes that the actual implementation would depend on air quality conditions, resource constraints, and logistical factors.

**Comment W25:** Ms. Toti states the implementation scenario graphically depicted on Draft Program EIR Figure 2-9 is not the worst case impact on public recreation lands. Ms. Toti states the worst-case impact would be the closure of Oceano Dunes SVRA to all motorized vehicle use.

Response to Comment W25: The commenter is correct that, hypothetically, the closure of Oceano Dunes SVRA would result in a greater impact to coastal recreation lands than the proposed Dust Control Program; however, the OHMVR Division is not proposing to close Oceano Dunes SVRA. In addition, as described in response to Comment W5 above, the Program EIR, as revised, evaluated and rejected voluntary OHV use restrictions as an alternative to the proposed Dust Control Program because this alternative would not avoid or substantially lessen the proposed Program's significant and unavoidable impacts. Refer also to response to Comment W22 above.

**Comment W26:** Ms. Toti summarizes Draft Program EIR information on the proposed Dust Control Program schedule and reiterates the OHMVR Division should prevent riding on the most emissive areas immediately.

Response to Comment W26: As a point of clarification, the Draft Program EIR Section 2.4 indicates the OHMVR Division is proposing to implement the proposed Dust Control Program for a multi-year period that is estimated to begin in Spring 2017 and continued through late 2022. Draft Program EIR page 2-32 states, "The conceptual schedule for the Dust Control Program annual review process is shown in Table 2-4. The OHMVR Division would submit two annual work plans during the first year of project implementation to account for initial project start-up." As shown in Section 3.3 of this Final Program EIR, the OHMVR Division has revised proposed schedule of activities described in Draft Program EIR to generally provide for the flexible planning, design, and implementation of proposed dust control projects. As part of these revisions, Draft

Program EIR Table 2-4 has been deleted from the EIR. See response to Comment W5 for a discussion of vehicle restrictions at Oceano Dunes SVRA.

**Comment W27:** Ms. Toti states the characterization of the proposed Dust Control Program area as having a "very high sand blowing hazard" that is contained Draft Program EIR Section 3.4.3 is incorrect and implies the high particulate matter levels coming from riding area are the same as those in the Pismo Dunes Natural Preserve and the Oso Flaco Lakes area.

Response to Comment W27: The information contained in Draft Program EIR Section 3.4.3 is derived from the Soil Survey of San Luis Obispo County, published by the Natural Resources Conservation Service (formerly the Soil Conservation Service). The information provides a general description of the geologic and soils setting of the Guadalupe-Nipomo Dune Complex and Oceano Dunes SVRA. As described in response to Comment W15 above, the Draft Program EIR summarizes information on studies conducted at Oceano Dunes SVRA, which to date indicate higher dust and PM10 are generally associated with the central to northern part of the Oceano Dunes SVRA open riding and camping area.

**Comment W28:** Ms. Toti states the Draft Program EIR vaguely refers to the 2008 Soil Conservation Standards, quotes PRC Section 5090.2, and concludes that portions of the La Grande Tract should be closed to use to repair and prevent accelerated erosion.

Response to Comment W28: Draft Program EIR Section 3.4.3 discusses the 2008 Soil Conservation Standards and specifically mentions PRC Sections 5090.2, 5090.35, and 5090.53. As explained in Draft Program EIR Section 3.4.3, Oceano Dunes SVRA is subject to strong winds that continually blow sand from the ocean to create dunes, as well as cause dunes to migrate inland slowly over time. The proposed Dust Control Program would not alter visitor limits, nor would not involve physical changes to the environment that would lead to erosion. Rather, planting vegetation and installing seasonal dust control measures would reduce saltation and temporarily and/or permanently trap sand. In addition, the commenter does not specifically identify a specific resource that could be significantly affected by erosion resulting from the proposed Program activities. The proposed Program would have a less than significant impact on geology and soils, including potential effects of erosion, and would not trigger any potential Soil Conservation Standards in regards to the Oceano Dunes SVRA open riding and camping area.

**Comment W29:** Ms. Toti summarizes information from Draft Program EIR Section 3.4.8 regarding potential impacts on public services. Ms. Toti states public service impacts should be evaluated by appropriate agencies and an adjustment to the number of OHV riders should be considered and evaluated.

Response to Comment W29: Within Pismo State Beach and Oceano Dunes SVRA, law enforcement and public safety services are provided by State Park Peace Officers (Rangers). Rangers regularly patrol the parks to enforce park regulations. Fire protection services in and outside of Pismo State Beach and Oceano Dunes SVRA are provided by the Five Cities Fire Authority, Station 61 located in Oceano, and CAL FIRE. The nearest CAL FIRE facility is Mesa Station 22. As explained in Draft Program EIR Section 3.4.8, the potential effects of the Dust Control Program on public services do not constitute a physical change to the environment and would not alter emergency service patterns. In addition, as explained in response to Comment W4 above, the OHMVR Division is not proposing changes to any camping or visitor limits established by CDP 4-82-300, as

amended, as part of the proposed Dust Control Program. Such considerations are outside the scope of the OHMVR Division's environmental review of the proposed Program.

**Comment W30:** Ms. Toti reiterates the Draft Program EIR does not identify that SLO County owns the La Grande Tract. Ms. Toti states Draft Program EIR Chapter 6 does not explain vehicle riding is what has de-stabilized dunes and destroyed vegetation.

Response to Comment W30: See response to Comment W12 above. The reason for unstabilized dunes is not germane to the Draft Program EIR's visual resource analysis; however, the Draft Program EIR Section 6.2.1.1 does describe that Oceano Dunes SVRA is an active recreation area and as such activities including OHV use is part of the baseline environmental conditions against which the proposed Dust Control Program is evaluated.

**Comment W31:** Ms. Toti reiterates concerns with the objectives the OHMVR Division has set for the proposed Dust Control Program.

Response to Comment W31: See response to Comment W11 above.

Comment W32: Ms. Toti reiterates that dunes self-restore when not disturbed by vehicle traffic.

Response to Comment W32: Seeresponse to Comments W14 and W18 above.

**Comment W33:** Ms. Toti suggests an alternative in which the OHMVR Division return the La Grande Tract to a buffer area by moving the fence line westward.

Response to Comment W33: The suggested alternative is substantially similar to the alternative evaluated in Draft Program EIR Section 12.2.3. As described in response to Comment W5 above, the Draft Program EIR, as revised, evaluated and rejected voluntary OHV use restrictions as an alternative to the proposed Dust Control Program because this alternative would not obtain most of the basic objectives set for the proposed Program nor avoid or substantially lessen the proposed Program's significant and unavoidable impacts.

**Comment W34:** Ms. Toti suggests an alternative in which the OHMVR Division close and repair emissive areas.

Response to Comment W34: The suggested alternative is substantially similar to the alternative evaluated in Draft Program EIR Section 12.2.3. Refer to response to Comment W33 above.

**Comment W35:** Ms. Toti suggests an alternative in which the OHMVR Division follow the provisions of CDP 4-82-300, as amended.

Response to Comment W34: Comment W35 does not appear to suggest a specific alternative for consideration. Draft Program EIR Section 2.2.4.2 includes a discussion of CDP 4-82-300, as amended. As described in this section of the Draft Program EIR, the OHMVR Division continues to manage Oceano Dunes SVRA in compliance with CDP 4-82-300 and is not proposing to perform any activities that would change compliance with existing CDP 4-82-300 conditions, as amended.

**Comment W36:** Ms. Toti suggests an alternative in which the OHMVR Division review and evaluate the recommendations of Dr. Melvin Zeldin contained in a January 2015 letter from the SLOAPCD to the CCC.

Response to Comment W36: The letter referenced by Comment W36 identifies three options for reducing dust emissions that are substantially similar to the proposed Dust Control Program's activities and/or alternative evaluated in the Draft Program EIR.

Option 1 consisted of eliminating all OHV activity in the area impacting the Nipomo Mesa. This suggestion is substantially similar to the alternative evaluated in Draft Program EIR Section 12.2.3. As described in response to Comment W5 above, the Draft Program EIR, as revised, evaluated and rejected voluntary OHV use restrictions as an alternative to the proposed Dust Control Program because this alternative would not obtain most of the basic objectives set for the proposed Program nor avoid or substantially lessen the proposed Program's significant and unavoidable impacts. Furthermore, in regards to this option, the SLOAPCD Air Pollution Control Officer advised the CCC (emphasis added), "While Mr. Zeldin identified eliminating riding upwind of the affected populated areas as the most effective strategy, that action is not endorsed nor recommended by the SLOAPCD" (see page 4 of Exhibit 11 to the submitted CCC staff report).

Option 2 consisted of providing two parallel rectangular vegetative areas within the riding area and "of sufficient size" to act as a wind barrier. Dr. Zeldin did not elaborate on the size of these vegetated areas; however, this option is substantially similar to the *proposed* Dust Control Program's vegetation plantings activities (20 acres per year for a period of five years).

Option 3 consisted of "strategically applied soil stabilizers in dual rectangular areas, with perimeter wind fences, within the primary riding areas shown to be most emissive by DRI studies, covering a total area of at least 80 acres." First, with regard to soil stabilizers, Draft Program EIR states (page 2-16, emphasis added), "In Spring 2015, the SLOAPCD and the OHMVR Division proposed the use of soil stabilizers on an approximately two-acre area east of the northern end of Sand Highway (see Figure 2-4); however, this proposal was rejected by the CCC." Nonetheless, the OHMVR Division has retained the potential use of soil stabilizers as a dust control measure, subject to the review and approval of the CCC. Draft Program EIR Section 2.3.2.4 describes that soil stabilizers, if used, would be a type of pilot or demonstration project deployed on a small scale, or possibly within the interior of fencing and straw bale arrays (to provide additional dust control). This use is consistent with that recommend in Option 3. Second, the proposed Dust Control Program involves more vegetation (approximately 100 acres) than the proposed 80 acres of seasonal dust control measures suggested in Option 3. These vegetation plantings would be in addition to the seasonal deployment of 40 acres of wind fencing or other artificial dust control measures. Furthermore, the recommendation for 80 acres of wind fencing is similar to that evaluated in Draft Program EIR Section 12.4, which states, "The alternate dust control program could still involve approximately 40 acres of wind fencing in Year 1; however, the amount of fencing would be increased by 20 percent each year until the Rule 1001 performance standard is met. At worst-case, if the performance standard is not met, this alternative could result in approximately 48, 58, 69, and 83 acres of seasonal wind fencing at Oceano Dunes SVRA in Years 2 to 5, respectively." The Draft Program EIR's evaluation of this alternative concluded it could result in new, potentially significant or significant and unavoidable impacts on aesthetics because the alternative could more than double the amount of wind fencing installed in Year 5 (83 acres versus 40 acres) if the Rule 1001

performance standard is not met, which would increase the visibility of the fencing array from all receptor vantage points.

Thus, for the reasons described above the alternatives suggested by Dr. Zeldin are already consistent with that proposed by the OHMVR Division or have been adequately evaluated in the Draft Program EIR.

**Comment W37:** Ms. Toti suggests an alternative in which the OHMVR Division creates foredunes and references the Oceano Dunes SVRA Wildlife Habitat Protection Plan as evidence that foredunes protect vegetation further inland.

Response to Comment W37: The suggested alternative is substantially similar to the alternative evaluated in Draft Program EIR Section 12.4. As described in the OHMVR Division response to SLOAPCD Comment D13, the OHMVR Division has added information to the EIR that describes the USFWS designated critical habitat in near shore areas at Pismo State Beach and Oceano Dunes SVRA because, in their existing condition, they contain the physical and biological features essential to western snowy plover (see Section 2.1 of this Final Program EIR). Planting vegetation in near shore areas would reduce the amount of open areas and increase the amount of vegetation, which could increase the risk of western snowy plover predation during nesting, foraging, and/or roosting if plovers are not able to detect approaching predators. As a result, planting vegetation in the near shore areas could result in a new, potentially significant impact to western snowy plover. Accordingly, this alternative would not avoid or substantially lessen the proposed Dust Control Program's significant impacts.

## 4.24 RESPONSE TO ORAL COMMENTS RECEIVED ON AUGUST 23, 2016

As stated in Section 1.1 of this Final Program EIR, the OHMVR Division held a public meeting to review the contents and findings of the Draft Program EIR on August 23, 2016. The public was invited to make oral comments at this meeting. In total, the OHMVR Division received and answered 41 total comments, many of which were not related to the content and findings of the Draft Program EIR, were not germane to the CEQA process, or were substantially similar to written comments the OHMVR Division received on the Draft Program EIR. Below is a summary of the oral comments received and the answers provided. Where possible, the OHMVR Division has identified responses to written comments that provide additional information on the issue raised during the public meeting.

**Oral Comment 1:** A member of the public noted that planting vegetation inside the Oceano Dunes SVRA would result in the loss of riding area.

Response to Oral Comment 1: Draft Program EIR Impact REC-1 evaluates the potential for the proposed Dust Control Program to limit and interfere with coastal vehicular recreation areas and concludes the proposed Program would result in a significant and unavoidable impact to vehicle recreation at Oceano Dunes SVRA.

**Oral Comment 2**: A member of the public asked about land ownership and the operating agreements between the OHMVR Division and SLO County.

Response to Oral Comment 2: The Program area includes most of the open sand areas in the central to northern portion of the Oceano Dunes SVRA open riding and camping area, commonly referred to as the "La Grande Tract." As explained in the response to Friends of Oceano Dunes Comment K23 and K130 (see Section 4.11 of this Final Program EIR) the OHMVR Division operates the part of the SVRA within the County's La Grande Tract under an existing operating agreement. This existing operating agreement provides the OHMVR Division with the existing authority to implement the proposed Dust Control Program.

**Oral Comment 3:** A member of the public asked if federal agencies were involved in the review of the proposed Dust Control Program and whether the proposed Program was subject to review under the National Environmental Policy Act.

*Response to Oral Comment 3*: As explained in the response to Friends of Oceano Dunes Comment K104 (see Section 4.11 of this Final Program EIR), the proposed Dust Control Program is not subject to NEPA review because it would not require a permit or other approval from a federal agency.

**Oral Comment 4**: A member of the public suggested the OHMVR Division should evaluate the economic impacts to the local community from the loss of property values and business activity associated with the dust issue.

Response to Oral Comment 4: As explained in the response to Comment R2 (see Section 4.18 of the Final Program EIR), the OHMVR Division has not conducted an economic analysis of the potential adverse health, safety, welfare, or property value impacts associated with existing air quality conditions. As a point of clarification, CEQA Guidelines Section 15064 (e) specifies that economic and social changes resulting from a project shall not be treated as significant effects unless there is a physical change caused by the economic or social effect, and there is no evidence to suggest the community of Oceano, the Nipomo Mesa, or the other surrounding land areas are suffering an adverse physical environmental effect resulting from a social or economic impact associated with the proposed

Dust Control Program. Furthermore, as explained in the response to Comment O2 (see Section 4.15 of this Final Program EIR), the proposed Program would improve air quality conditions on the Nipomo Mesa and thus is not anticipated to result in the adverse impacts raised by the comment.

**Oral Comment 5:** A member of the public suggested the Draft Program EIR should consider the aesthetics of existing OHV recreation at Oceano Dunes SVRA.

Response to Oral Comment 5: As explained in more detail in the response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), the Draft Program EIR, describes the existing environmental conditions at and in the vicinity of the Dust Control Program area at the time the OHMVR Division issued the Revised NOP for the EIR (February 2015). Specifically, Draft Program EIR Section 6.2 describes the existing visual resource setting of the proposed Dust Control Program includes visitor vehicles, which may be brightly colored. The proposed Dust Control Program would not alter the existing aesthetics of OHV recreation at Oceano Dunes SVRA and thus this impact does not need to be considered in the Draft Program EIR.

**Oral Comment 6**: A member of the public asked whether Rule 1001 is still in effect and applicable to the OHMVR Division.

Response to Oral Comment 6: Comment noted. Draft Program EIR Section 1.1.4.1 explains the status of the Rule 1001 settlement agreement, stating, in part, "The trial court excised the permit to operate requirement from Rule 1001, but kept the remainder of Rule 1001 intact. In a separate lawsuit, Friends (of Oceano Dunes) is challenging the settlement agreement as an illegal amendment of Rule 1001. That case is pending."

**Oral Comment 7:** A member of the public asked for clarification on whether the OHMVR Division would maintain access to Sand Highway during implementation of the proposed Dust Control Program.

Response to Oral Comment 7: As explained in the response to Comment V5 (see Section 4.22 of this Final Program EIR), Draft Program EIR Figures 2-2 to 2-5 graphically depict the location of the Sand Highway at Oceano Dunes SVRA. The proposed Dust Control Program would not interfere with Sand Highway. Specifically, Mitigation Measure REC-1 requires the OHMVR Division to plant vegetation and deploy seasonal dust control measures in a manner that does not interfere with the Sand Highway and other established paths of travel, such as by providing a setback from these areas.

**Oral Comment 8**: A member of the public asked about the evolution of dust control measures and the associated costs to date.

Response to Oral Comment 8: Draft Program EIR Section 1.1.3 summarizes the results of eight different studies examining dust and PM10 generation at Oceano Dunes SVRA that helped to inform the basis for the proposed Dust Control Program. In addition, Draft Program EIR Section 12.2 provides information on the labor and costs considered to be the upper bound of what is realistically feasible for the OHMVR Division to implement.

**Oral Comment 9:** A member of the public provided an observation that noise from OHV activity can be heard after 11:00 PM.

Response to Oral Comment 9: Comment noted. This refers to existing conditions and does not raise any specific points on the Draft Program EIR's evaluation of the proposed Dust Control Program's potential environmental impacts. The OHMVR Division is not

proposing changes to camping or visitor limits and the proposed Dust Control Program would not alter park operating hours.

**Oral Comment 10**: A member of the public asked about the purpose of the EIR and the cost to prepare the document.

Response to Oral Comment 10: Draft Program EIR Section 1.4 states, "An EIR is an objective, informational document that informs governmental agency decision makers and the public of the potential for significant project effects, including possible ways to minimize those effects, and describes reasonable alternatives to the project (CEQA Guidelines §15121(a))." The section further explains that the OHMVR Division has prepared an objective, informational document that contains a sufficient degree of analysis to inform decision makers about the proposed Dust Control Program's potential direct and indirect physical, environmental effects. Comments on the costs to prepare the EIR are outside the scope of the OHMVR Division's environmental review of the proposed Dust Control Program.

**Oral Comment 11:** A member of the public asked whether the EIR considered the health concerns of the Mesa residents.

Response to Oral Comment 11: Draft Program EIR Section 1.1.2 summarizes information on existing air quality conditions on the Nipomo Mesa and the adverse health effects associated with exposure to particulate matter. The proposed Dust Control Program would not exacerbate any existing air quality conditions. Rather, as explained in Draft Program EIR Section 3.4.2, the proposed Program activities would "block the flow of wind across the dune landscape, slow or stop sand movement and corresponding dust generation at Oceano Dunes SVRA, and improve downwind air quality." Thus, the proposed Program would not have an adverse impact on air quality conditions on the Nipomo Mesa.

**Oral Comment 12:** A member of the public asked about baseline conditions for the CEQA process.

Response to Oral Comment 12: As explained in the response to SLOAPCD Comment D13 (see Section 4.4 of this Final Program EIR), CEQA specifies that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, and that this environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The Draft Program EIR, as required by CEQA, describes the physical environmental conditions at and in the vicinity of the Dust Control Program area as they existed in February 2015, which was when the OHMVR Division issued the Notice of Preparation for the EIR. These descriptions are provided generally in Chapter 2 of the Draft Program EIR, and more specifically in the individual EIR chapters that address specific resource topics, such as recreation and biological resources. As described Draft Program EIR Section 4.2 and Section 7.2, Pismo State Beach and Oceano Dunes SVRA are very popular destinations that also happen to support several special-status species, including western snowy plover and California least tern, as well as cultural resources.

**Oral Comment 13**: A member of the public question asked if a comparison of the underlying geological conditions at Pismo Beach and Oceano Dunes SVRA have been compared against the conditions at Morro Dunes.

Response to Oral Comment 13: No, the Draft Program EIR does not provide a comparison of conditions at Pismo Beach and Morro Dunes. This refers to existing conditions and does not raise any specific points on the Draft Program EIR's evaluation of the proposed Dust Control Program's potential environmental impacts.

**Oral Comment 14:** A member of the public suggests the loss of riding area should be replaced 1:1 with new riding areas or opportunities.

Response to Oral Comment 14: As shown in Section 3.4 of this Final Program EIR, the OHMVR Division has augmented and clarified Draft Program EIR Mitigation Measure REC-1 to address mitigation ratios, areas, and standards.

**Oral Comment 15**: A member of the public suggests the OHMVR Division conduct an economic analysis of closing the SVRA to OHV recreation and/or reducing recreational areas.

Response to Oral Comment 15: Refer to the response to Oral Comment 4 above.

**Oral Comment 16:** A member of the public asked about direct OHV contribution to dust levels.

Response to Oral Comment 16: Draft Program EIR Section 1.1.3 summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA and formed the basis for developing the proposed Dust Control Program, including the SLOAPCD's Phase 1, Phase 2, and Community Monitoring reports. The SLOAPCD's Phase 2 Study concluded OHVs are not a major factor responsible for high PM levels downwind of Oceano Dunes SVRA.

**Oral Comment 17**: A member of the public suggests an alternative that temporarily closes the SVRA either during high winds or an experimental two-year closure.

Response to Oral Comment 17: The suggested alternative is substantially similar to the alternative evaluated in Draft Program EIR Section 12.2.3, as revised by Section 3.8 of this Final EIR. As described in response to Comment W5 above (see Section 4.23 of this Final Program EIR), the Draft Program EIR, as revised, evaluated and rejected voluntary OHV use restrictions as an alternative to the proposed Dust Control Program because this alternative would not obtain most of the basic objectives set for the proposed Program nor avoid or substantially lessen the proposed Program's significant and unavoidable impacts.

**Oral Comment 18:** A member of the public asked if the Draft Program EIR considers the historical nature of the OHV recreation at Oceano Dunes SVRA.

Response to Oral Comment 18: Yes, the Draft Program EIR considers historical vehicular recreation in the discussion contained under Draft Program EIR Impact REC-1, beginning on page 4-22, and also details the loss of vehicular recreation area over time at the SVRA.

**Oral Comment 19**: A member of the public suggested there be a public disclosure of the dust issue to businesses and property owners in impacted areas.

Response to Oral Comment 19: This comment is out of the scope and purview of the OHMVR Division's environmental review of the proposed Dust Control Program and does not raise any specific points on the Draft Program EIR's evaluation of the proposed Program's potential environmental impact.

**Oral Comment 20:** A member of the public asked about the timing of the Draft Program EIR given the modeling exercise being conducted by the OHMVR Division, CARB, and the SLOAPCD, as well as about recirculation of the Draft Program EIR.

Response to Oral Comment 20: As explained in the response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), it is currently not possible for the OHMVR Division or any other agency, including the SLOAPCD, to definitively and conclusively identify what magnitude of dust control is necessary to achieve compliance with the Rule 1001 performance standard. The OHMVR Division, the SLOAPCD, and CARB are currently in the preliminary stages of undertaking a modeling exercise that may inform the location and magnitude of dust control measures installed at Oceano Dunes SVRA; however, as described in Section 2.1.3.1 of this Final Program EIR, this exercise is still only in its preliminary stages.

In addition, as described in the response to SLOAPCD Comment D2 (see Section 4.4 of this Final Program EIR), the OHMVR Division is required (pursuant to CEQA) to consider subsequent dust control activities against the scope and content of the Program EIR. Specifically, page 1-11 states, "In accordance with CEQA Guidelines Section 15168(c), if dust control activities implemented later under this Program EIR are within the scope of this Program EIR, no further CEQA review is necessary. If the OHMVR Division determines the later activity would have effects that were not examined in this Program EIR, it would evaluate potential impacts under PRC Section 21166, which only requires subsequent CEQA review in certain circumstances. Any feasible mitigation measures or alternatives developed in this Program EIR must also be included in the subsequent activity." The OHMVR Division would review and evaluate the results of this modeling program to see if they fit within the scope of the Dust Control Program EIR when it is appropriate to do so (e.g., when the modeling is complete to the satisfaction of the OHMVR Division, SLOAPCD, and CARB).

**Oral Comment 21**: A member of the public asked why the OHMVR Division proposed a five-year program as opposed to a three-year alternative.

Response to Oral Comment 21: Draft Program EIR Section 12.2.2 evaluates an alternative that consists of an accelerated schedule for the proposed Dust Control Program. Specifically, Draft Program EIR page 12-5 states, "The OHMVR Division considered an accelerated schedule for the proposed Dust Control Program in which the proposed activities would be undertaken on a two- or three year schedule; however, an accelerated schedule that guarantees or ensures dust control measures achieve the goals set by the proposed agreement is not considered feasible for several reasons. First, the number of dust control measures necessary to achieve the goals of the proposed agreement is not known for certain. Second, even if the exact level of control were known, vegetation planted on an active dune system takes time to establish and is hampered by a short growing season, lack of available on-site water, and protocols requiring use of locally collected native vegetation. Thus, there are natural limitations to planting schedules. Newly planted vegetation could be augmented with seasonal dust control materials, but this would require the OHMVR Division to acquire, deploy, and maintain what is presumed to be substantial quantities of artificial materials, and the resources (staff and materials) necessary to plant sufficient vegetation or deploy sufficient artificial materials are not available due to state budget limitations and schedule. Accordingly, the OHMVR Division has rejected this alternative because it is not logistically and technically feasible."

**Oral Comment 22:** A member of the public expressed support for planting trees to control downwind dust.

Response to Oral Comment 22: Comment noted.

**Oral Comment 23**: A member of the public asked about the need for track out on Grand Avenue when Grover Beach communities do not have a PM10 issue.

Response to Oral Comment 23: As explained in the response to Comment F2 (see Section 4.6 of this Final Program EIR), the proposed Dust Control Program area includes a small portion of Grand Avenue in the City of Grover Beach for the installation, operation, and maintenance of a track-out prevention device as required by SLOAPCD Rule 1001.

**Oral Comment 24:** A member of the public asked if the OHMVR Division considered other methods of dust control approved and/or recommended by the SLOAPCD besides fencing.

Response to Oral Comment 24: Draft Program EIR Section 12.4 discusses an alternate dust control program recommended by the SLOAPCD. Specifically, on Draft Program EIR pages 12-10 to 12-11, the EIR states, "The alternate dust control program would still involve planting approximately 20 acres of native dune vegetation per year; however, the planting would be emphasized in areas closer to the shore and where foredunes would be expected in the absence of vehicular recreation." The Draft Program EIR then goes on to conclude (page 12-11), "The alternate dust control program could also result in direct and/or indirect impacts on biological resources because the emphasis on planting vegetation in near-shore areas would likely modify, to some degree, USFWS-designated critical habitat for the western snowy ployer (federal-listed as threatened). Planting vegetation in this critical habitat area could impact active nests by providing habitat for predators to hide and stalk nesting western snowy plovers and California least terns (federal- and state-listed as threatened). The proposed Dust Control Program largely avoids this impact by setting back the Program area at least 1,100 feet from the mean high tide line and avoiding USFWS critical habitat areas." Thus, the Draft Program EIR did consider other methods of dust control recommended by the SLOAPCD.

**Oral Comment 25**: A member of the public asked about cumulative sources of PM10.

Response to Oral Comment 25: A discussion of the project's contribution to cumulative PM10 levels is addressed in Section 11.2.5 of the Draft Program EIR which states, the project would, "result in an air quality benefit from a reduction of dust and PM10 emissions in the vicinity of the Program" and determined the Program's contribution to cumulative air quality impacts would not be cumulatively considerable.

**Oral Comment 26:** A member of the public asks why the EIR did not identify a numerical or percentage target for dust reduction and suggests the EIR identify the targeted effectiveness of the dust control measures.

Response to Oral Comment 26: As explained in the response to CCC Comment C4 (see Section 4.3 of this Final Program EIR), Section 1.1.3 of the Draft Program EIR summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA and which helped to form the basis for the proposed Dust Control Program. None of these studies describe the level of dust control necessary to achieve compliance with the Rule 1001 performance standard. Even the SLOAPCD, in its comments on the Draft Program EIR, acknowledges that the magnitude of emissions reductions, as well as the areas where mitigation will be most effective, is still being evaluated (see response to Comment D2 in Section 4.4 of this Final EIR). Thus, it is not

possible for the OHMVR Division or any other agency, including the SLOAPCD, to definitively and conclusively identify what magnitude of dust control is necessary to achieve compliance with the Rule 1001 performance standard.

**Oral Comment 27**: A member of the public expressed support for the use of other colors of fencing that blend in with the environment.

Response to Oral Comment 27: Comment noted. As a point of clarification, the Draft Program EIR concludes the potential visual impact from wind fencing would be less than significant regardless of whether orange or green fencing is used (see discussion under Draft Program EIR Impact AES-1). In other words, the Draft Program EIR does not require the use of green fencing to make the use of potential wind fencing visually compatible with the visual character and quality of Oceano Dunes SVRA.

**Oral Comment 28**: A member of the public stated the orange dust control fencing installed at Oceano Dunes SVRA in Spring 2016 is visible from Port San Luis.

Response to Oral Comment 28: This comment is consistent with the information and findings in the Draft Program EIR. Draft Program EIR Section 6.2.1.2 identifies publicly accessible points along the shoreline as potential sensitive receptors. Specifically, Draft Program EIR page 6-5 states, "As shown in Figure 2-1, Oceano Dunes SVRA is situated near the center of a spiral-shaped stretch of coastline. This location allows the SVRA to be seen from parks and public areas located north and south of Oceano Dunes SVRA, such as the Pismo Pier, Dinosaur Caves Park and other public areas along Ocean Boulevard in Shell Beach, and Rancho Guadalupe Dunes County Park in Santa Barbara County. These public parks and other areas are approximately three to five miles up and down the coast from Oceano Dunes SVRA. The SVRA, therefore, lies in the fore to middle ground of the viewer's perspective from these areas, with the Nipomo Mesa, elevated parts of Pismo Beach and Grover Beach, and parts of the Coast and Transverse Ranges in the view background when looking east." In addition, Draft Program EIR Impact AES-1 evaluates the significance of the potential change in view from these sensitive receptors locations and concludes this impact would be less than significant.

**Oral Comment 29:** A member of the public asked if neutral fencing colors could be used or if orange fencing must be used out of a concern for rider safety.

Response to Oral Comment 29: Draft Program EIR Section 6.4.2 identifies that the OHMVR Division would deploy green- or neutral-colored wind fencing when existing orange-colored fencing supplies deteriorate or run out.

**Oral Comment 30**: A member of the public asked if the proposed tree plantings would obstruct public views or otherwise displace land or other biological features and requests the potential visual resource impacts of tree plantings be included in the EIR.

Response to Oral Comment 30: Draft Program EIR page 6-14 states, "Any trees planted as part of the Dust Control Program would take several years to grow to the point where they could be visible from a distance and/or distinguishable from groves of trees located along SR 1." As a point of clarification, the potential tree plantings would only have the potential to obstruct public views from SR 1. Vehicles travelling southbound on SR 1 in the vicinity of the proposed tree planting area would not view trees planted by the OHMVR Division because: 1) some the proposed tree planting area is situated behind (west of) existing, large eucalyptus groves; 2) the parts southbound SR 1 that are not bordered by eucalyptus groves do not have a view of the ocean (rather, it has a view of

the rail line adjacent to SR 1 and the Phillips 66 refinery); and 3), SR 1 bends to the east, away from the proposed tree planting area. Vehicles travelling northbound on SR 1 near the proposed tree planting area would approach the tree planting area head-on in the vicinity of the Phillips 66 refinery (i.e., from their viewpoint, the trees would be directly in front); however, this stretch of SR 1 does not have ocean views, and eucalyptus trees are a common sight adjacent to the road. Past the Phillips 66 refinery, vehicles travelling northbound view the refinery, the rail line, and large groves of eucalyptus trees. Thus, due to existing topography and landforms, eucalyptus, and development between SR 1 and the proposed tree planting area, the OHMVR Division's proposed tree planting activities, if they occur, would not block or obstruct scenic views of the dunes or ocean from SR 1. The potential impacts from tree plantings on biological resources are evaluated in under Draft Program EIR Impacts BIO-1 and BIO-3.

**Oral Comment 31**: A member of the public suggests the Draft EIR public meeting presentation should provide more information next time.

Response to Oral Comment 31: Comment noted.

**Oral Comment 32:** A member of the public requests clarification on the installation of vegetation during the 2017/2018 planting season and noted the Draft Program EIR should be updated if the first year of targeted planting is misidentified.

Response to Oral Comment 32: As explained in the response to Comment W26 (see Section 4.23 of this Final Program EIR), the OHMVR Division is proposing to implement the proposed Dust Control Program for a five-year period that is estimated to begin in Spring 2017 and continue through late 2022. As shown in Section 3.3 of this Final Program EIR, the OHMVR Division has revised the proposed schedule of activities described in Draft Program EIR Section 2.4 and deleted Table 2-4 from the EIR.

**Oral Comment 33**: A member of the public suggested the OHMVR Division consider installing the temporary measures (wind fencing, soil stabilizers, etc.) on a year-round basis as opposed to a seasonal basis.

Response to Oral Comment 33: The commenter is correct seasonal dust control measures would not be permanent; however, they could be in place from approximately March 1 to September 30, or the 7 months of the year in which Oceano Dunes SVRA is most often exposed to strong and frequent prevailing winds from the northwest.

**Oral Comment 34:** A member of the public asked about the possible agricultural contributions to dust levels on the Nipomo Mesa.

Response to Oral Comment 34: This comment refers to existing conditions and does not raise any specific points on the Draft Program EIR's evaluation of the proposed Dust Control Program's potential environmental impacts.

**Oral Comment 35**: A member of the public asked about the location of schools and their proximity to the highest identified emission zone. Following this question, a representative from the SLOAPCD confirmed that three schools (Lopez Continuation, Mesa Middle, and Dorothea Lang) are not within the SLOAPCD CDF forecast zone.

Response to Oral Comment 35: As explained in the response to Comment W16 (see Section 4.23 of this Final Program EIR), Draft Program EIR 2.3.1.1 summarizes monitoring at nearby schools showed particulate matter levels lower than that measured by CDF.

**Oral Comment 36:** A member of the public expresses concern that the proposed tree plantings will not be effective in controlling PM10 measurements.

Response to Oral Comment 36: As explained in the response to Comment N1 (see Section 4.14 of this Final Program EIR), trees provide a surface for the deposition of airborne particles and may also absorb a small amount of airborne particulates; however, particles deposited on leaf surfaces may subsequently become re-suspended as leaf litter deteriorates. Regardless, the Draft Program EIR recognizes the efficacy of this measure is not certain and does not take credit for any near-term reductions associated with this activity. Refer also to response to Comment W7 (see Section 4.23 of this Final Program EIR).

**Oral Comment 37**: A member of the public asked if the OHMVR Division has information on PM10 levels measured in other areas in the state such as Salinas, Monterey Bay, and other coastal areas.

Response to Oral Comment 37: This comment does not raise any specific points on the Draft Program EIR's evaluation of the proposed Dust Control Program's potential environmental impacts.

**Oral Comment 38**: A member of the public commented that the Draft EIR does not include a clear dust reduction goal.

Response to Oral Comment 38: Refer to the response to Oral Comment 26 above.

**Oral Comment 39:** A member of the public commented the dust issue is unique to San Luis Obispo County.

Response to Oral Comment 39: This comment does not raise any specific points on the Draft Program EIR's evaluation of the proposed Dust Control Program's potential environmental impacts.

**Oral Comment 40**: A member of the public requested the Draft Program EIR include consideration of technical factors like the differences in sand grain size from the Pismo area to Rancho Guadalupe Dunes.

Response to Oral Comment 40: Draft Program EIR Section 1.1.3 which summarizes the results of eight different studies that examined dust and PM generation at Oceano Dunes SVRA and which helped to form the basis for the proposed Dust Control Program, including a 2013 study that found "factors such as sand grain size, meteorology, and topography all influence PM10 emissions (both potential and actual)." Nonetheless, this comment does not raise any specific points on the Draft Program EIR's evaluation of the proposed Dust Control Program's potential environmental impacts.

**Oral Comment 41**: A member of the public asked about the EIR certification process.

Response to Oral Comment 41: As explained in Section 1.1 of this Final Program EIR, upon completion of the public review period for the Draft Program EIR, the OHMVR Division prepared written responses to all significant environmental comments and incorporated them into this Final Program EIR. Written responses to comments received from any public agency have been made available to those agencies at least 10 days before the OHMVR Division considers certification of the Final EIR.

The OHMVR Division will consider the comments it received on the Draft Program EIR and the information contained in this document when deciding on whether or not certify

the Final Program EIR and approve the proposed Dust Control Program. Should the OHMVR Division decide to certify the EIR for the proposed Dust Control Program, a statement of overriding considerations would be required because the Draft Program EIR identifies the proposed Program would result in several significant and unavoidable impacts that cannot be avoided or substantially reduced via mitigation measures or Program alternatives. Thus, the OHMVR Division would prepare and adopt a statement of overriding considerations at the time it considers certifying this Program EIR.

## Oceano Dunes SVRA Dust Control Program Final Program Environmental Impact Report

## UPDATED EIR APPENDIX B

Biological Resources – Special Status Species Tables

- B1: Special-Status Plant Species with the Potential to Occur in the Dust Control Program Area
- B2: Special-Status Wildlife Species with the Potential to Occur in the the Dust Control Program Area

	Updated EIR Appendix E
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Table B1. Special-statu	s Plant Species	s with the Potential to	Occur in the Dust Control	Program Area		
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
red sand verbena Abronia maritima	CRPR 4.2	Along coast from SLO County to Mexican border.	Coastal dunes, 0-100 m.	Perennial herb, FebNov.	High- Known from CDPR surveys to occur in and around Oceano Dunes SVRA, including near Strand Way, Pismo Dunes Natural Preserve, and on vegetation islands. Suitable habitat present within the project area.	3, 4, 5, 6
Hoover's bent grass Agrostis hooveri	CRPR 1B.2	Endemic, coastal SLO and SB Counties.	Closed cone coniferous forest, chaparral, cismontane woodland or valley and foothill grassland usually on sandy soils; 6-610 m.	Perennial herb, AprJul.	None- No suitable habitat and no records from area.	2, 3
Douglas' fiddleneck Amsinckia douglasiana	CRPR 4.2	Endemic, west of the Sierras from Monterey County to Santa Barbara & in Tehachapi Ranges.	Cismontane woodland or valley and foothill grassland on Monterey shale; 0-1950 m.	Annual herb, MarMay	None- No suitable habitat and no records from area.	3
aphanisma Aphanisma blitoides	CRPR 1B.2	Southern California coast and offshore islands from Santa Maria to Mexican border.	Coastal bluff scrub, coastal dunes or coastal scrub on sandy soils; 1-305 m.	Annual herb, MarJun.	None- Outside of species range.	3
Eastwood's brittle-leaf manzanita Arctostaphylos crustacea ssp. eastwoodiana	CRPR 1B.1	Endemic to coastal SB County.	Chaparral (maritime, sandy); 90-365 m.	Perennial evergreen shrub, March	None- Outside of species range.	3
Santa Lucia Manzanita Arctostaphylos luciana	CRPR 1B.2	Endemic to SLO County.	Chaparral or cismontane woodland on shale; 350-850 m.	Perennial evergreen shrub, DecMar.	None- No suitable habitat and no records from area.	3
Morro manzanita Arctostaphylos morroensis	FT, CRPR 1B.1	Endemic to SLO County.	Chaparral (maritime), cismontane woodland, coastal dunes (pre- Flandrian) or coastal scrub on Baywood fine sand; 5- 205 m.	Perennial evergreen shrub, DecMar.	None- No suitable habitat and no records from area.	1, 3

Table B1. Special-statu	s Plant Specie	s with the Potential to	Occur in the Dust Control	Program Area		
Species	Listing Status	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
Oso manzanita Arctostaphylos osoensis	CRPR 1B.2	Endemic to SLO County.	Chaparral or cismontane woodland on dacite porphyry buttes; 95 to 500 m. (312-1,640 m.).	Perennial evergreen shrub, FebMar.	None- No suitable habitat and no records from area.	3
Pecho manzanita Arctostaphylos pechoensis	CRPR 1B.2	Endemic to SLO and SB Counties.	Closed-cone coniferous forest, chaparral or coastal scrub on siliceous shale; 125-850 m.	Perennial evergreen shrub, NovMar.	None- No suitable habitat and no records from area.	3
Santa Margarita manzanita Arctostaphylos pilosula	CRPR 1B.2	Endemic, occurs in SLO, SB and Monterey Counties.	Broad-leaved upland forest, closed-cone coniferous forest, chaparral or cismontane woodland sometimes on sandstone; 170-1100 m.	Perennial evergreen shrub, DecMay	None- No suitable habitat and no records from area.	2, 3
La Purisima Manzanita  Arctostaphylos purissima	CRPR 1B.1	Endemic to SB County.	Chaparral (sandy), coastal scrub.	Perennial evergreen shrub, NovMay	None- Outside of species range.	3
sand mesa manzanita Arctostaphylos rudis	CRPR 1B.2	Endemic to SLO and SB Counties.	Chaparral (maritime) or coastal scrub on sandy soils; 25-322 m.	Perennial evergreen shrub, NovFeb.	Low- Observed within Oceano Dunes SVRA by CDPR staff in 2013. The closest CNDDB record is 1.5 miles east of Oceano Dunes SVRA at Nipomo Mesa. Suitable habitat present in the project area.	2, 3, 5
marsh sandwort Arenaria paludicola	FE, SE, CRPR 1B.1	Remaining extant occurrences are in SLO and Los Angeles Counties.	Sandy openings in marshes and swamps (fresh water or brackish); 3-170 m.	Perennial stoloniferous herb, May-Aug.	Low- Not known to occur within the project area. Only known extant population at Oso Flaco Lake. Black Lake within the potential tree planting area provides some suitable habitat within the project area; however, no other suitable habitat present within the project area.	1, 2, 3, 4, 5
Miles' milk-vetch Astragalus didymocarpus var. milesianus	CRPR 1B.2	Endemic to SLO, SB and Ventura Counties.	Coastal scrub (clay); 20-90 m.	Annual herb, MarJun.	None- No suitable habitat and no records from area.	3

Table B1. Special-statu	s Plant Specie	s with the Potential to	Occur in the Dust Control	Program Area		
Species	Listing Status	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
Nuttall's milkvetch Astragalus nuttallii var. nuttallii	CRPR 4.2	Endemic to coast from San Francisco to SB County.	Coastal bluff scrub or coastal dunes; 3-120 m.	Perennial herb, JanNov.	Moderate- Known from CDPR surveys and CNDDB records to occur within Oceano Dunes SVRA including in Pismo Dunes Natural Preserve, Phillips 66 Leasehold, Oso Flaco, and vegetation islands. Suitable habitat present in the project area.	3, 4, 5
Coulter's saltbrush Atriplex coulteri	CRPR 1B.2	Along coast from San Luis Obispo to Mexican border.	Coastal bluff scrub, coastal dunes, coastal scrub or valley and foothill grassland on alkaline or clay soils; 3-460 m.	Perennial herb, MarOct.	None- No suitable habitat and no records from area.	3
Davidson's saltscale Atriplex serenana var. davidsonii	CRPR 1B.2	Along coast from Santa Maria to San Diego.	Coastal bluff scrub or coastal scrub on alkaline soils; 10-200 m.	Annual herb, April-Oct.	None- No suitable habitat and no records from area.	2, 3
San Luis Obispo mariposa lily Calochortus obispoensis	CRPR 1B.2	Endemic to SLO County.	Chaparral, coastal scrub or valley and foothill grassland often on serpintinite soils; 50-730 m.	Perennial bulbiferous herb, May-Jul.	None- No suitable habitat and no records from area.	2
La Panza mariposa lily Calochortus simulans	CRPR 1B.3	Endemic to SLO and SB Counties.	Chaparral, cismontane woodland, lower montane coniferous forest or valley and foothill grassland on sandy, often granitic and sometimes serpintinite soils; 395-1100 m.	Perennial bulbiferous herb, AprJun.	None- No suitable habitat and no records from area.	3
Cambria morning-glory Calystegia subacaulis subsp. episcopalis	CRPR 4.2	Endemic to SLO and SB Counties.	Chaparral, cismontane woodland, coastal prairie or valley and foothill grassland usually on clay soils; 30-500 m.	Perennial rhizomatous herb, MarMay	None- No suitable habitat and no records from area.	3
San Luis Obispo owl's clover Castilleja densiflora spp. obispoensis	CRPR 1B.2	Endemic to SLO County.	Meadows and seeps or valley and foothill grassland sometimes on serpintinite soils; 10-400 m.	Annual herb, MarMay	None- No suitable habitat and no records from area.	3

Species	Listing Status	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
Monterey Coast paintbrush Castilleja latifolia ssp. latifolia	CRPR 4.3	Endemic to central coast.	Closed-cone coniferous forest, cismontane woodland (openings), coastal dunes or coastal scrub on sandy soils; 0-185 m.	Perennial herb (hemiparasitic), FebSep.	High- Known from CDPR surveys to be widespread in the Oceano Dunes SVRA area, including Carpenter Creek, Oso Flaco Lake, vegetation islands, Pismo Dunes Natural Preserve, and Phillips 66 Leasehold. Suitable habitat present in the project area.	4, 5
California jewelflower Caulanthus californicus	FE	Santa Barbara Canyon, the Carrizo Plain in San Luis Obispo County, and the Kreyenhagen Hills in Fresno County	Nonnative Grassland, Upper Sonoran Subshrub Scrub, and Cismontane Juniper Woodland; 75-90 m.	Annual herb, Feb-Mar.	None- No suitable habitat and no records from area.	1
Congdon's tarplant Centromadia parryi ssp. congdonii	CRPR 1B.2	Endemic to the San Francisco Bay Area, Monterey coast and SLO County.	Valley and foothill grassland (alkaline); 0-230 m.	Annual herb, May-Nov.	None- No suitable habitat and no records from area.	3
coastal goosefoot Chenopodium littoreum	CRPR 1B.2	Endemic to SLO, SB and Los Angeles Counties.	Coastal dunes; 10-30 m.	Annual herb, AprAug.	Moderate- Known from CDPR surveys and CNDDB records to occur nearby at Oso Flaco and Jack Lakes. Suitable habitat present in the project area.	2, 3, 4, 5
Brewer's spineflower Chorizanthe breweri	CRPR 1B.3	Endemic to SLO and Monterey Counties.	Closed-cone coniferous forest, chaparral, cismontane woodland or coastal scrub on serpentinite, rocky or gravelly soils; 45-800 m.	Annual herb, AprAug.	None- No suitable habitat and no records from area.	2, 3
Douglas's spineflower Chorizanthe douglasii	CRPR 4.3	Endemic to SLO, San Benito and Monterey Counties.	Chaparral, cismontane woodland, coastal scrub or lower montane coniferous forest on sandy or gravelly soils; 55-1600 m.	Annual herb, AprJul.	Low- Documented during previous CDPR surveys to occur within the Pavilion Hill vegetation island. Marginal suitable habitat present in the project area.	4, 5
straight-awned spineflower Chorizanthe rectispina	CRPR 1B.3	Endemic to SLO, SB and Monterey Counties.	Chaparral, cismontane woodland or coastal scrub; 85-1035 m.	Annual herb, AprJul.	None- No suitable habitat and no records from area.	2

Table B1. Special-statu	s Plant Species	s with the Potential to	Occur in the Dust Control	Program Area		
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
Bolander's water hemlock Cicuta maculata var. bolanderi	CRPR 2.1	Endemic to the San Francisco Bay Area, Sacramento Valley and central coast.	Coastal, fresh or brackish water marshes and swamps' 0-200 m.	Perennial herb, JulSep.	None- Presumed extirpated from SLO County.	3
Chorro Creek bog thistle Cirsium fontinale var. obispoense	FE, SE, CRPR 1B.2	Endemic to SLO County.	Chaparral, cismontane woodland, coastal scrub or valley and foothill grassland in serpentinite seeps and drainages; 35-380 m.	Perennial herb, FebSep.	None- No suitable habitat and no records from area.	1
surf thistle Cirsium rhothophilum	ST, CRPR 1B.2	Endemic to SLO and SB Counties.	Coastal bluff scrub or coastal dunes; 3-60 m.	Perennial herb, AprJun.	Low- Not known to occur within the project area. Observed during CDPR surveys at nearby Oso Flaco Lake. Suitable habitat present in the project area.	2, 3, 4, 5, 6
La Graciosa thistle Cirsium scariosum var. Ioncholepis	FE, ST, CRPR 1B.1	Endemic to SLO, SB and Monterey Counties.	Cismontane woodland, coastal dunes, coastal scrub, marshes and swamps (brackish) or valley and foothill grassland on mesic, sandy soils; 4-220 m.	Perennial herb, May-Aug.	Moderate- Known from CDPR surveys and CNDDB records to occur nearby at Oso Flaco Lake, near Jack Lake, in the Callander Dunes, and at the Dune Lake complex. Suitable habitat present in the project area.	1, 2, 3, 4, 5
seaside cistanthe Cistanthe maritima	CRPR 4.2	Along southern coast from Santa Maria to Mexican border.	Coastal bluff scrub, coastal scrub or valley and foothill grassland on sandy soils; 5-300 m.	Annual herb, FebAug.	None- Outside of species range.	3
California saw-grass Cladium californicum	CRPR 2.2	Eastern and southern California.	Alkaline or freshwater meadows and seeps; 60-865 m.	Perennial rhizomatous herb, JunSep.	None- Known from a 1990 CNDDB record near Oso Flaco Lake. No suitable habitat present in the project area.	2, 3, 5
Pismo clarkia Clarkia speciosa ssp. Immaculata	FE, CRPR 1B.1	Endemic to SLO County.	Chaparral (margins, openings), cismontane woodland or valley and foothill grassland on sandy soils; 25-185 m.	Annual herb, May-Jul.	None- No suitable habitat within project area.	1, 2, 3

Species	Listing Status <sup>1</sup>	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
Saltmarsh bird's beak Cordylanthus maritimus ssp. maritimus	SE FE	Central and southern California coast.	Coastal salt marshes and coastal swamps; 0-30 m.	Annual herb, May-Oct.	None- Only known to occur at Morro Bay within San Luis Obispo County. No suitable habitat in the project area.	1, 2, 3
seaside bird's beak Cordylanthus rigidus ssp. littoralis	CRPR 1B.1	Endemic to SB and Monterey Counties.	Closed-cone coniferous forest, chaparral (maritime), cismontane woodland, coastal dunes or coastal scrub on sandy, often disturbed sites; 0-425 m.	Annual herb, AprOct.	None- Outside of species range.	2
branching beach aster Corethrogyne leucophylla	CRPR 3.2	Endemic to coast from Santa Cruz to Santa Maria.	Closed-cone coniferous forest or coastal dunes; 3-60 m.	Perennial herb, May-Dec.	Low- Not known to occur within or near the project area. Suitable habitat present in the project area.	3, 5
Gaviota tarplant  Deinandra increscens  ssp. villosa	FE, CE, CRPR 1B.1	Endemic to SB County.	Coastal bluff scrub, coastal scrub or valley and foothill grassland; 35-430 m.	Annual herb, May-Oct.	None- Outside of species range.	3
paniculate tarplant Deinandra paniculata	CRPR 4.2	Several counties in southern California.	Coastal scrub, valley and foothill grassland, and vernal pools, usually on vernally mesic and sometimes on sandy sites; 25- 940 m.	Annual herb, AprNov.	Low- Observed nearby the project area during previous CDPR surveys in the southern portion of the Phillips 66 Leasehold. Marginal suitable habitat present in the project area.	4, 5
dune larkspur Delphinium parryi ssp. Blochmaniae	CRPR 1B.2	Endemic to SLO, SB and Ventura Counties.	Chaparral (maritime), coastal dunes; 0-200 m.	Perennial herb, AprMay	Moderate- Known from CNDDB records to occur nearby, south of Oso Flaco Lake, at the Callander Dunes, and east of the Oceano Dunes SVRA boundary. Suitable habitat present in the project area.	2, 3, 4, 5
beach spectaclepod Dithyrea maritima	ST, CRPR 1B.1	Southern coast and off-shore islands from San Luis Obispo to Los Angeles.	Coastal dunes, coastal scrub (sandy); 3-50 m.	Perennial rhizomatous herb, MarMay	Moderate- Known from CDPR and CNDDB records to occur nearby at Oso Flaco Lake and south of Oso Flaco Lake. Suitable habitat present in the project area.	2, 3, 4, 5, 6

Table B1. Special-statu	s Plant Specie	s with the Potential to	Occur in the Dust Control	Program Area		
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
Blochman's dudleya Dudleya blochmaniae ssp. blochmaniae	CRPR 1B.1	Along coast from west of Paso Robles to Mexican border.	Coastal bluff scrub, chaparral, coastal scrub or valley and foothill grassland on rocky, often clay or serpentinite soils; 5-450 m.	Perennial herb; AprJun.	None- No suitable habitat and no records from area.	2, 3
Blochman's leafy daisy Erigeron blochmaniae	CRPR 1B.2	Endemic to SLO and SB Counties.	Coastal dunes, coastal scrub; 3-45 m.	Perennial rhizomatous herb; JunAug.	High- Locally common and widespread throughout Oceano Dunes SVRA. Suitable dune habitat present in the project area.	2, 3, 4, 5
Indian Knob mountainbalm <i>Eriodictyon altissimum</i>	FE, SE, CRPR 1B.1	Endemic to SLO County.	Chaparral (maritime), cismontane woodland or coastal scrub; 80-270 m.	Perennial evergreen shrub, MarJun.	None- No suitable habitat and no records from area.	1, 3
Hoover's button-celery Eryngium aristulatum var. Hooveri	CRPR 1B.1	Extant occurrences in Alameda, San Benito, San Diego and SLO Counties.	Vernal pools, 3-45 m.	Annual/perennial herb, JulAug.	None- No suitable habitat and no records from area.	2
suffrutescent wallflower Erysimum suffrutescens	CRPR 4.2	Endemic to and southern coast.	Coastal bluff scrub, chaparral (maritime), coastal dunes or coastal scrub; 0- 150 m.	Perennial herb, JanJul.	High- Locally common and widespread throughout Oceano Dunes SVRA. Suitable habitat present in the project area.	3, 4, 5
Mesa horkelia Horkelia cuneata var. puberula	CRPR 1B.1	Endemic to central and southern coast.	Chaparral (maritime), cismontane woodland, coastal scrub on sandy or gravelly soils; 70-810 m.	Perennial herb, FebSep.	Moderate- Known from CNDDB records from the Oso Flaco Lake area and in the vicinity of Black Lake. Black Lake provides suitable habitat within the potential tree planting area. Marginal suitable habitat present within the remainder of the project area.	2, 3
Kellogg's horkelia Horkelia cuneata var. sericea	CRPR 1B.1	Endemic to coast from San Francisco Bay Area to vicinity of Lompoc.	Closed-cone coniferous forest, chaparral (maritime), coastal dunes or coastal scrub in sandy or gravelly openings; 10-200 m.	Perennial herb, AprSep.	Moderate- Known from previous CDPR surveys to occur nearby in the Pismo Dunes Natural Preserve and Phillips 66 Leasehold. Suitable habitat present in the project area.	2, 3, 4, 5

Table B1. Special-statu	ıs Plant Specie	s with the Potential to	Occur in the Dust Control	Program Area		
Species	Listing Status	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
southwestern spiny rush Juncus acutus ssp. leopoldii	CRPR 4.2	Central and southern coast.	Coastal dunes (mesic), meadows and seeps (alkaline seeps) or marshes and swamps (coastal salt); 3-900 m.	Perennial rhizomatous herb; MarJun.	Low- Has been documented during previous CDPR surveys in the Pismo Dunes Natural Preserve and the Eucalyptus Tree vegetation island. Suitable habitat in the project area.	4, 5
Jones' layia Layia jonesii	CRPR 1B.2	Endemic to SLO County.	Chaparral or valley and foothill grassland or clay or serpentinite soils; 5-400 m.	Annual herb, MarMay	None- No suitable habitat and no records from area.	3
fuzzy prickly phlox Linanthus californicus	CRPR 4.2	Endemic to SLO and SB Counties.	Coastal dunes, 1-30 m.	Perennial deciduous shrub, MarAug.	High- Observed during previous CDPR surveys in the Pismo Dunes Natural Preserve, Phillips 66 Leasehold, and the backdunes of South Oso Flaco. Suitable habitat present in the project area.	4, 5
San Luis Obispo County lupine Lupinus ludovicianus	CRPR 1B.2	Endemic to SLO County.	Chaparral or cismontane woodland on sandstone or sandy soils; 50-525 m.	Perennial shrub, AprJul	None- No suitable habitat and no records from area.	3
Nipomo Mesa Iupine Lupinus nipomensis	FE, SE, CRPR 1B.1	Endemic to SLO County.	Coastal dunes; 10-50 m.	Annual herb, DecMay	High- Known from SLO County Land Conservancy surveys and CNDDB records to occur nearby near Jack Lake, near Black Lake, and at the Callander Dunes. Suitable habitat present in the project area.	1, 2, 3, 4, 5
dunedelion <i>Malacothrix incana</i>	CRPR 4.3	Endemic to central and southern coast and off-shore islands.	Coastal dunes or coastal scrub; 2-35 m.	Perennial herb, JanOct.	Moderate- Observed during CDPR surveys at the Pavilion Hill vegetation island, 7.5 revegetation area, and near Oso Flaco Lake and Creek. Suitable habitat present in the project area.	4, 5, 6

Table B1. Special-statu	s Plant Species	s with the Potential to	Occur in the Dust Control	Program Area		
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
crisp monardella Monardella undulata ssp. crispa	CRPR 1B.2	Endemic to SLO and SB Counties.	Coastal dunes or coastal scrub; 10-120 m.	Perennial rhizomatous herb, AprAug.	Present- Locally common and widespread throughout Oceano Dunes SVRA. Occurs within the vegetation island habitats and at the edges of other vegetation within the project area according to 2012 vegetation mapping and CNDDB records.	2, 3, 4, 5
San Luis Obispo monardella <i>Monardella undulata</i> ssp. <i>undulata</i>	CRPR 1B.2	Endemic to SLO and SB Counties.	Coastal dunes or coastal scrub (sandy); 10-200 m.	Perennial rhizomatous herb, May-Sep.	Moderate- Known from CNDDB records to occur nearby in the Pismo Dunes Natural Preserve, near Jack Lake, near Black Lake, in the Callander Dunes, in the Oso Flaco Lake area, and south of Oso Flaco Lake. Suitable habitat present in the project area.	2, 3, 4, 5
California spineflower Mucronea californica	CRPR 4.2	Endemic to central and southern California.	Chaparral, cismontane woodland, coastal dunes, coastal scrub or valley and foothill grassland on sandy soils; 0-1400 m.	Annual herb, MarAug.	Moderate- Observed during CDPR surveys in the Pismo Dunes Natural Preserve, Phillips 66 Leasehold, and South Oso Flaco. Suitable habitat present in the project area.	3, 4, 5
Gambel's watercress Nasturtium gambelii	FE, ST, CRPR 1B.1	Central and southern coast.	Marshes and swamps (freshwater or brackish).	Perennial rhizomatous herb, AprOct.	Low- Not known to occur within the project area. Observed during previous CDPR surveys at nearby Oso Flaco Lake in 2013. Black Lake could provide suitable habitat within the potential tree planting area; however, no additional suitable habitat present within the project area.	1, 2, 3, 4, 5
Spreading navarretia Navarretia fossalis	FT	Southern California	Chenopod scrub, marshes and swamps, playas, vernal pools.	Annual herb, AprJun.	None- Outside of species range.	1

Table B1. Opecial-statu	-		Occur in the Dust Control	1		
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
coast woolly-heads Nemacaulis denudata var. denudata	CRPR 1B.2	Central and southern coast.	Coastal dunes; 0-100 m.	Annual herb, AprSep.	Low- One CNDDB record within the dunes north of Oso Flaco Lake. Suitable habitat present in the project area.	3, 5
short-lobed broomrape Orobanche parishii ssp. brachyloba	CRPR 4.2	Central and southern coast and off-shore islands.	Coastal bluff scrub, coastal dunes or coastal scrub on sandy soils; 3-305 m.	Perennial herb (parasitic), AprOct.	Low- Known from CDPR surveys and CNDDB from one occurrence in South Oso Flaco. Suitable habitat present in the project area.	2, 3, 4, 5
Hickman's popcorn flower Plagiobothrys chorisianus var. hickmanii	CRPR 4.2	Endemic to San Mateo, Santa Clara, Santa Cruz, San Benito, Monterey and SLO Counties.	Closed-cone coniferous forest, chaparral, coastal scrub, marshes and swamps or vernal pools; 15-185 m.	Annual herb, AprJun.	Moderate- Observed during CDPR surveys at four vegetation islands, in the Phillips 66 Leasehold, and at Maidenform. Suitable habitat present in the project area.	4, 5
sand almond Prunus fasciculata var. punctata	CRPR 4.3	Endemic to SLO and SB Counties.	Chaparral (maritime), cismontane woodland, coastal dunes or coastal scrub on sandy soils; 15-200 m.	Perennial deciduous shrub, MarApr.	Low- Only observed during CDPR surveys within the Phillips 66 Leasehold. Suitable habitat present in the project area.	3, 4, 5
Hoffmann's sanicle Sanicula hoffmannii	CRPR 4.3	Endemic to central coast and off-shore islands.	Broad-leafed upland forest, chaparral or coastal scrub often on serpentinite or clay soils; 30-300 m.	Perennial herb, MarMay	None- No suitable habitat and no records from area.	3
black-flowered figwort Scrophularia atrata	CRPR 1B.2	Endemic to SLO and SB Counties.	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub or riparian scrub; 10-500 m.	Perennial herb, MarJul.	Low- Suitable habitat occurs in the project area; however, this species mostly occurs on much older sand dunes than are present in the area. No CNDDB records or observations from CDPR surveys occur in or near the project area.	2, 3
Blochman's groundsel Senecio blochmaniae	CRPR 4.2	Endemic to SLO and SB Counties.	Coastal dunes, 0-100 m.	Perennial herb, May-Oct.	Moderate- Locally common and widespread throughout Oceano Dunes SVRA. Suitable habitat present in the project area.	3, 4, 5

Species	Listing Status <sup>1</sup>	Range in California	Habitat	Life Form/ Blooming Period	Potential to Occur	Sources
San Bernardino aster Symphyotrichum defoliatum	CRPR 1B.2	Endemic to California.	Cismontane woodland, coastal scrub, lower montane coniferous forest, meadows and seeps, marshes and swamps or valley and foothill grassland (vernally mesic) near ditches, streams or springs; 2-2040 m.	Perennial rhizomatous herb, JulNov.	None- Known from a CNDDB occurrence from 1993 approximately 0.5-mile from the Pismo Dunes Natural Preserve. No suitable habitat present in the project area.	2, 3, 5
<sup>1</sup> Listing Status Key: FE – Federal Endangered FT – Federal Threatened FC – Federal Candidate SE – State Endangered ST – State Threatened SC – State Candidate	CF CF CF CF .1 .2	RPR 2: Plants rare, threater RPR 3: More information ab RPR 4: Limited distribution RPR Threat Code extension Seriously endangered in Fairly endangered in Cali	` '	common elsewhere. ist).  nces threatened / high degree eatened)	•	

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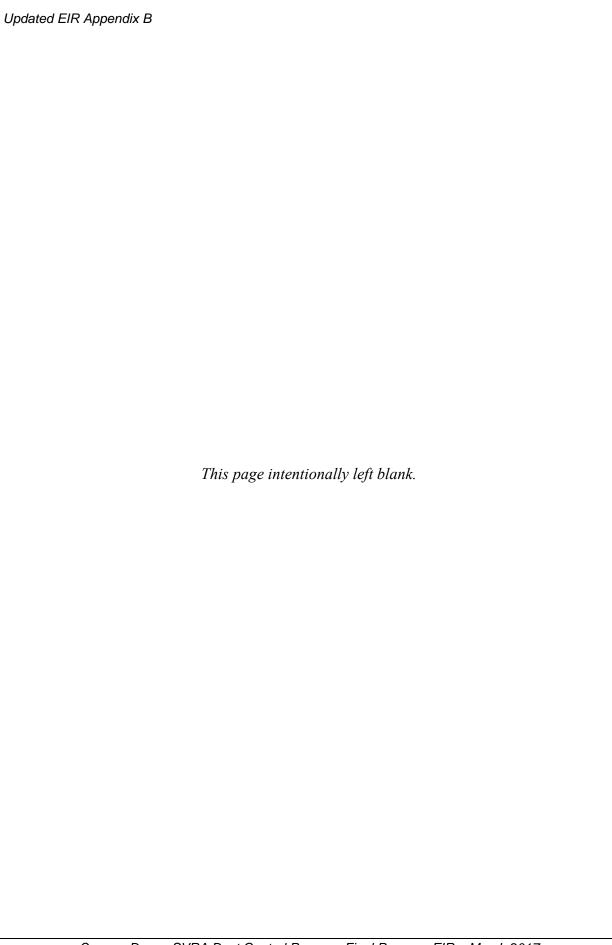


Table B2. Special-status Animal	Species with	the Potential to Occur in the D	ust Control Program Area		
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Potential to Occur	Sources
		Fish			
steelhead - south/central California coast ESU Oncorhynchus mykiss irideus	FT, CSSC	Coastal river basins from the Russian River south to Soquel and Aptos Creek, and the drainages of San Francisco and San Pablo Bays, including the Napa River.	Hatches in fresh water, lives adult life in the ocean, and returns to natal stream or river to spawn; spawning and rearing habitat consists of perennial streams with clear, cool to cold, fast flowing water with a high dissolved oxygen content and abundant gravels and riffles.	None- Collected during CDPR fish surveys in Pismo Creek and Arroyo Grande Creek. No suitable habitat present in the project area.	2, 3, 4
Arroyo chub Gila orcuttii	CSSC	Native to streams from Malibu Creek to San Luis Rey River Basin; introduced into streams in Santa Clara, Ventura and Santa Ynez.	Slow water stream sections with mud or sand bottoms; feeds heavily on aquatic vegetation and associated invertebrates.	None- Has not been observed during CDPR fish surveys at Oceano Dunes SVRA. No suitable habitat present in the project area.	2
unarmored threespine stickleback Gasterosteus aculeatus williamsoni	FE, SE	Weedy pools, backwaters and among emergent vegetation in small southern California streams.	Cool, clear water with abundant vegetation	None- No known records in or near the project area. No suitable habitat present in the project area.	2, 3
tidewater goby Eucyclogobius newberryi	FE, CSSC	Occurs in brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River.	Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	None- Collected from Arroyo Grande Creek and Pismo Creek during CDPR surveys. No suitable habitat present in the project area.	1, 2, 3, 4
		Inverteb	rates		
monarch butterfly Danaus plexippus		Overwinters along the western coast from Mendocino in northern California, south to Baja California, Mexico.	Roost habitat consists of wind- protected tree groves, typically eucalyptus, Monterey pine, Monterey Cypress, with nectar and water sources nearby.	Low- Known roost location located adjacent to the North Beach Campground in Pismo State Beach. No known roost habitat occurs inside the project area; however, some trees are present in the potential tree planting area that could provide marginal roosting habitat.	2

Species	Listing Status	Range in California	Habitat	Potential to Occur	Sources
	Status	Amphibians/	/Pontilos		
California tiger salamander Ambystoma californianse	FT, ST, CSSC	Endemic, found in isolated populations the Central Valley and Central Coast ranges.	Needs underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal wetlands for breeding.	None- No suitable habitat and not known from project area.	1
California red-legged frog Rana draytonii	FT, CH, CSSC	Historically, this species was found along the coast and Coast Ranges from Mendocino County in northern California south to northern Baja California, and inland east through the northern Sacramento Valley into the foothills of the Sierra Nevada mountains, south to Tulare county, and possibly Kern county.	Inhabits lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	Moderate- Observed during CDPR surveys in the Oso Flaco Lake complex, Little Olso Flaco Lake, Jack Lake, Lettuce Lake, Little Olso Flaco Creek, and Arroyo Grande Creek. Suitable habitat present in Black Lake within the potential tree planting area. Could also make overland migrations across the project area.	1, 2, 3, 4
Western spadefoot Spea hammondii	CSSC	Ranges from near Redding south throughout the Great Valley and its associated foothills, through the South Coast Ranges into coastal southern California south of the Transverse mountains and west of the Peninsular mountains, into northwest Baja California.	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands; needs vernal pools for egg laying and breeding.	Moderate- Observed at Oso Flaco Lake in February and March of 2000. Marginal suitable habitat present in the vicinity of Black Lake within the tree planting area. Could also make overland migrations across project area.	2, 3, 4
Western pond turtle Emys marmorata	CSSC	From Oregon border of Del Norte and Siskiyou Counties south along the coast to San Francisco Bay, inland through the Sacramento Valley and on western slope of Sierra Nevada.	Ponds, marshes, rivers, streams, and irrigation canals with muddy or rocky bottoms and with watercress, cattails, water lilies, or other aquatic vegetation in woodlands, grasslands, and open forests.	Low- Observed in Oso Flaco Lake, Jack Lake, and Arroyo Grande Creek in 2006. Suitable habitat present in Black Lake within the tree planting area; however, no other suitable aquatic habitat present in the project area.	2, 3, 4

Table B2. Special-status Anima	al Species with	the Potential to Occur in the D	ust Control Program Area		
Species	Listing Status	Range in California	Habitat	Potential to Occur	Sources
silvery legless lizard Anniella pulchra pulchra	CSSC	Occurs from the southern edge of the San Joaquin River in northern Contra Costa County south to northwestern Baja California Del Norte just south of Colonia Guerrero. Five lineages; Lineage D occurs in project area.	Dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and riparian habitats with moist, sandy soils.	Moderate- Observed in Oceano Dunes SVRA in vegetation islands, at Oso Flaco Lake, Little Oso Flaco Lake, Jack Lake, and near Lettuce Lake. Suitable habitat is present in the project area.	2, 3, 4
coast (California) horned lizard Phrynosoma blainvillii	CSSC	Historically, found along the Pacific coast from the Baja California border west of the deserts and the Sierra Nevada, north to the Bay Area, and inland as far north as Shasta Reservoir, and south into Baja California. Ranges up onto the Kern Plateau east of the crest of the Sierra Nevada. Current range is more fragmented.	Chaparral, grasslands, coniferous forests in fine, loose soils.	Moderate- Observed at Oso Flaco Lake and Little Oso Flaco Lake. Anecdotal reports in vegetation islands at Oceano Dunes SVRA. Suitable habitat present in the project area.	2, 3, 4
two-striped garter snake Thamnophis hammondii	CSSC	Coastal California from vicinity of Salinas to northwest Baja California, from sea level to about 7,000 feet.	Highly aquatic, found in or near permanent fresh water, often along streams with rocky beds and riparian growth.	Low- Observed at Oso Flaco Lake. Black Lake within the potential tree planting area provides marginal suitable habitat. No other suitable habitat present in the project area.	2, 3, 4
		Birds	5		
American white pelican Pelecanus erythrorhynchos	CSSC (nesting)	Year-round resident along the Coast and Central Valley from the San Francisco Bay Area south to the border with Mexico; and a summer resident in the northeast corner of California.	White pelicans nest on the ground in colonies on earthen, sandy or rocky, islands, peninsulas or tule mats. They forage in shallow inland waters or shallow coastal marine waters.	Low- Project area is outside the known breeding range. Observed infrequently during CDPR surveys within Oceano Dunes SVRA. Suitable foraging habitat is present at Black Lake within the project limits. Additional suitable foraging habitat is present at lakes nearby the project area; therefore, this species could fly through the project area.	3

Table B2. Special-status Animal	Table B2. Special-status Animal Species with the Potential to Occur in the Dust Control Program Area					
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Potential to Occur	Sources	
California brown pelican Pelecanus occidentalis californicus	CFP	Year-round resident along southern California coast, migrant elsewhere along coast.	Colonial nester on coastal islands just outside the surf line.	Low- Project area is outside the known breeding range. Observed during CDPR surveys within Oceano Dunes SVRA. No suitable roosting habitat is present within the project limits. Suitable foraging habitat is present within the potential tree planting area at Black Lake and near the project area within the lakes and ocean.	5	
least bittern Ixobrychus exilis	CSSC	Year-round resident in southern California, summer resident in the Central Valley.	Colonial nester in marshlands and borders of ponds and reservoirs which provide ample cover; nests usually placed low in tules, over water.	Low- Not known to breed in or near the project area. County records for this species are scarce. Observed at Oso Flaco Lake. No suitable breeding habitat present within the project limits. Black Lake within the potential tree planting area provides marginal suitable foraging habitat.	3	
wood stork Mycteria americana	CSSC	Migrant in southern California, vagrant elsewhere.	Freshwater and saltwater sloughs, shallow ponds and marshes.	Low- One observation during CDPR surveys at Oso Flaco Lake in 2011. No suitable breeding or foraging habitat present within the project area.	3	
brant Branta bernicla	CSSC	Winters along entire California coast.	Requires well-protected, shallow marine waters with inter-tidal eel grass beds, primarily within bays and estuaries; primary food is eel grass.	Low- Project area is outside the known breeding range. Winter visitor to Oceano Dunes SVRA. Observed at Oceano Dunes SVRA during CDPR surveys. No suitable foraging habitat present within the project limits.	3	
Tricolored blackbird Agelaius tricolor	CSSC	Native to California with the exception of a few small nesting colonies in Oregon, Washington, Nevada, and coastal Baja California. Over 90 percent of the California population resides in the Central Valley.	Typically occur in cattail ( <i>Typha</i> spp.) or tule ( <i>Schoenoplectus</i> spp.) marshes. Forages in fields and pastures. Breeds in large freshwater marshes.	Low- Project area is outside the known breeding range. Observed in Oceano Dunes SVRA during CDPR surveys. No suitable nesting or foraging habitat present within the project limits.	3	

Table B2. Special-status Anima	I Species with	the Potential to Occur in the D	ust Control Program Area		
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Potential to Occur	Sources
redhead <i>Aythya americana</i>	CSSC	Year-round resident in central valley, winter resident elsewhere in state.	Nests on marshy lakes and ponds, winters in large flocks on sheltered bays and lakes.	Low- Project area is outside the known breeding range. Observed foraging in Oceano Dunes SVRA during CDPR surveys. No suitable foraging habitat is present within the project limits.	3
Northern harrier Circus cyaneus	CSSC	Throughout lowland California; has been recorded in fall at high elevations.	Grasslands, meadows, marshes, and seasonal and agricultural wetlands.	High- Regularly observed in Oceano Dunes SVRA. Uncommon in the winter and rare, but regular breeding in the Oso Flaco Lake area. Black Lake in the potential tree planting area provides suitable breeding and foraging habitat. Could migrate through the project area.	3, 4, 5
white-tailed kite Elanus leucurus	CFP	Lowland areas west of Sierra Nevada from head of Sacramento Valley south, including coastal valleys and foothills, to western San Diego County at Mexico border.	Low foothills or valley areas with valley or live oaks, riparian areas, and marshes near open grasslands for foraging.	Moderate- Occasionally observed in Oceano Dunes SVRA. Suitable nesting and foraging habitat present in the project area.	3
golden eagle Aquila chrysaetos	CFP	Foothills and mountains throughout California.	Nests on cliffs and escarpments or in tall trees overlooking open country; forages in annual grasslands, chaparral, and oak woodlands with plentiful medium and large-sized mammals.	Low- Observed in Oceano Dunes SVRA during CDPR surveys. No suitable breeding habitat present in the project area. Marginal foraging habitat present within the project limits.	3
bald eagle Haliaeetus leucocephalus	SE, CFP	Year-round resident in northwestern and northeastern California, winter resident elsewhere in the state.	Ocean shore, lake margins and rivers for both nesting and wintering; most nests are within 1 mile of water.	Low- No observations in or near the project area. No suitable breeding habitat present within the project limits. Suitable foraging habitat within and near the project area.	5

·	Listing	n the Potential to Occur in the D		Potential to Occur	Sources
Species	Status 1	Range in California	Habitat	Potential to Occur	Sources
American peregrine falcon Falco peregrines ssp. anatum	CFP	Year-round resident throughout California.	Nests on cliffs or man-made structures such as buildings and bridges; feeds on birds.	Moderate- Regularly observed in flight and hunting within Oceano Dunes SVRA. Not known to nest within Oceano Dunes SVRA. Suitable foraging habitat present within the project area. No suitable breeding habitat present in the project area.	2, 3, 5
California black rail Laterallus jamaicensis ssp. coturniculus	ST, CFP	This endemic subspecies of the black rail ( <i>Laterallus jamaicensis</i> ) occurs in the San Francisco Bay region, parts of the Central Valley and at the southeastern border of the State.	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. It needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	None- Occurs historically at Oso Flaco Lake, but no suitable habitat occurs within the project limits.	2, 3
California clapper rail Rallus longirostris obsoletus	ST, FE	Found year-round along California coastal saline emergent wetlands.	Coastal wetlands and brackish waters.	None- No observations in or near the project area. No suitable habitat occurs within the project limits.	1, 3
Western snowy plover Charadrius alexandrinus nivosus	FT, CSSC	Pacific population of western snowy plover occurs along the entire coastline.	Occurs on sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	High- Known to nest and winter in Oceano Dunes SVRA. Suitable nesting habitat present in the project area.	1, 2, 3, 4
California least tern Sternula antillarum browni	FE, SE, CFP	Nests along the coast from San Francisco Bay south to Northern Baja California.	Colonial breeder on bare or sparsely vegetated flat substrates, sandy beaches, alkali flats, landfills or paved areas.	High- Known to nest in Oceano Dunes SVRA. Suitable nesting habitat present in the project area. Black Lake within the potential tree planting area provides suitable foraging habitat.	1, 2, 3, 4
black tern Chidonias niger	CSSC	Breeds primarily in Modoc Plateau region, with some breeding in the Sacramento and San Joaquin valleys.	Freshwater lakes, ponds, marshes and flooded agricultural fields; at coastal lagoons or estuaries during migration.	Low- Project area is outside the known breeding range. Observed within Oceano Dunes SVRA, including at Oso Flaco Lake. No suitable foraging habitat is present within the project limits; however, suitable foraging habitat is present near the project area.	3

Table B2. Special-status Anima			Togram Area	Detential to Coorn	Carras
Species	Listing Status	Range in California	Habitat	Potential to Occur	Sources
black skimmer <i>Rynchops niger</i>	CSSC	Summer resident in southern California, winter resident on central coast.	Nests on gravel bars, low islets and sandy beaches, in unvegetated sites; colonies usually less than 200 pairs.	Low- Project area is outside the known breeding range. Observed within Oceano Dunes SVRA during CDPR surveys. No suitable foraging habitat present in the project area. Moderately suitable foraging habitat is present near the project area.	3
marbled murrelet Brachyramphus marmoratus	FT, SE	Nests inland along coast from Eureka to Oregon border and from Half Moon Bay to Santa Cruz.	Nests in old-growth redwood dominated forests, up to six miles inland, often in Douglas fir.	None- Project area is outside the known breeding range. Observed within Oceano Dunes SVRA during CDPR surveys. No suitable nesting or foraging habitat present within the project area; however, foraging habitat is present within the ocean near the project area.	1, 3
western yellow-billed cuckoo Coccyzus americanus occidentalis	FPT, SE	Breeds at isolated locations in central and southern California.	Riparian forest nester, along the broad, lower flood bottoms of large river systems; nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles or wild grape.	Low- Observed at Oso Flaco Lake in 1999 and at Oceano Lagoon in 2010. Marginal nesting habitat present within the project area.	2, 3
western burrowing owl Athene cunicularia	CSSC	Lowlands throughout California, including Central Valley, northeastern plateau, southeastern deserts, and coastal areas; rare along south coast.	Level, open, dry, heavily grazed or low stature grassland or desert vegetation with available burrows.	Moderate- Known to utilize Oceano Dunes SVRA during migration, but not known to breed within the SVRA. Observed at Oso Flaco Lake in 1999, Phillips 66 Leasehold in 2006, near the chemical toilets on the beach in 2005 and 2006, and at Oceano Lagoon in 2010. Suitable wintering and foraging habitat present in the project area.	2, 3, 4, 5
Vaux's swift Chaetura vauxi	CSSC	A summer (breeding) migrant in northern California and coastal California from the Oregon border to Monterey County, and in the Sierra Nevada from the Oregon border to northern Kern County.	Nests in snags and hollow trees in redwood and Douglas fir forests.	Low- Project area is outside the known breeding range. Observed at Oceano Dunes SVRA during CDPR surveys. No suitable habitat present within the project limits	3, 5

Table B2. Special-status An	Table B2. Special-status Animal Species with the Potential to Occur in the Dust Control Program Area					
Species	Listing Status	Range in California	Habitat	Potential to Occur	Sources	
black swift Cypseloides niger	CSSC	This species occurs in California as a summer resident and its breeding range is patchily distributed throughout the State excluding the Central Valley and much of the coast.	Nests behind or beside permanent or semi-permanent waterfalls, on perpendicular cliffs near water and in sea caves.	Low- Project area is outside the known breeding range. Observed at Oceano Dunes SVRA during CDPR surveys. No suitable habitat present within the project limits.	3	
olive-sided flycatcher Contopus cooperi	CSSC	A summer (breeding) migrant in the Cascade Range and Modoc Plataeu in northern California, Sierra Nevada in eastern California, Coast Ranges, and Transverse and Peninsular Ranges in Southern California.	Nests in coniferous forests.	Low- Uncommon breeder in San Luis Obispo County. Observed within Oceano Dunes SVRA during CDPR surveys. No suitable nesting habitat present in the project area. Suitable wintering habitat present in the project area.	3	
willow flycatcher Empidonax trailii	SE	Occurs as a summer (breeding) migrant in moist thickets and riparian areas throughout California.	Nests in dense riparian habitats with perennial water.	Low- Observed during CDPR surveys at Oso Flaco Lake in 2003 and 2014. No CNDDB records for the area and no suitable nesting or roosting habitat present in the project area. May migrate through the project area.	1, 3, 4	
loggerhead shrike Lanius ludovicianus	CSSC (nesting)	Resident and winter visitor in lowlands and foothills throughout California; rare on coastal slope north of Mendocino County, occurring only in winter.	Prefers open habitats with scattered shrubs, trees, posts, fences, utility lines, or other perches.	High- Regularly observed in Oceano Dunes SVRA. Known to nest and forage within Oceano Dunes SVRA. Suitable nesting and foraging habitat present in the project area	3, 4, 5	
least Bell's vireo Vireo bellii ssp. pusillus	FE, SE	Occurs as a summer (breeding) migrant in the far south of California and in northern Baja California.	Nests in riparian habitats, generally in dense vegetation near surface water.	Low- Limited suitable habitat in riparian areas within the potential tree planting area, but has not been observed in or near the project area.	1, 5	
bank swallow Riparia riparia	ST	Occurs primarily around the remaining natural river banks of the Sacramento and Feather Rivers in the Sacramento Valley.	Colonial nester, nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine textured/sandy soils near streams, rivers, lakes or ocean to dig nesting hole.	Low – Project area is outside the known breeding range. Known to forage in and near the project area as recently as 2005.	3	

Table B2. Special-status Ai	nimal Species with	the Potential to Occur in the D	ust Control Program Area		
Species	Listing Status	Range in California	Habitat	Potential to Occur	Sources
Lucy's warbler Oreothlypis luciae	CSSC	Lower Colorado River valley and washes and arroyos emptying into it.	Partial to thickets of mesquite, riparian scrub and even stands of tamarisk.	Low- Project area is outside the known breeding range. Observed at Oceano Dunes SVRA during CDPR surveys. Marginal foraging habitat present in the project area.	3
yellow warbler Setophaga petechia	CSSC	Nests over all California except Central Valley, Mojave Desert region, and high altitudes in Sierra Nevada; winters along Colorado River and in parts of Imperial and Riverside Counties.	Nests in riparian areas dominated by willows, cottonwoods, sycamores, or alders or in mature chaparral; may also use oaks, conifers, and urban areas near stream courses.	Moderate- Observed during CDPR surveys at Arroyo Grande Creek, Jack Lake, Little Oso Flaco Lake, and Oso Flaco Lake. Marginal foraging and nesting habitat is present near Black Lake within the potential tree planting area.	3, 4, 5
Allen's hummingbird Selasphorus sasin	CSSC	Breeds along the Pacific coast from southern Oregon to southern California. Winters in Mexico and is an occasional vagrant to the eastern United States.	Requires wooded or bushy canyons, parks, gardens, and mountain meadows. Breeds in riparian scrub, riparian woodland, and coast live oak woodland, as well as ornamental plantings in parks and residential areas.	Low- Observed in Oceano Dunes SVRA during CDPR surveys. Marginal foraging and nesting habitat present within the project area.	4
yellow-breasted chat Icteria virens	CSSC (nesting)	Summer (breeding) migrant in northern California, in portions of the Central Valley and the west slope of the Sierra Nevada, on the Central and Southern coast, and in portions of the southern California deserts.	Nests in dense riparian and shrub habitats.	Low- Recorded at the Oso Flaco Maps Station in 2000 but there was no evidence of breeding. Limited suitable breeding and foraging habitat present within the potential tree planting area portion of the project area near Black Lake.	5
summer tanager Piranga rubra	CSSC (nesting)	Summer resident of desert riparian along lower Colorado River, and locally elsewhere in California deserts.	Requires cottonwood-willow riparian for nesting and foraging; prefers older, dense stands along streams.	Low- Project area is outside the known breeding range. Observed at Oceano Dunes SVRA during CDPR surveys. Limited suitable breeding habitat present within the potential tree planting area portion of the project area near Black Lake.	3

Table B2. Special-status Anima	Species with	the Potential to Occur in the D	ust Control Program Area		
Species	Listing Status <sup>1</sup>	Range in California	Habitat	Potential to Occur	Sources
yellow-headed blackbird Xanthocephalus xanthocephalus	CSSC (nesting)	Winter resident along the central and south coast, summer resident in eastern California, and year-round resident in southern California.	Nests in freshwater emergent wetlands with dense vegetation and deep water, often along the borders of lakes or ponds.	Low- Project area is outside the known breeding range. Observed at Oceano Dunes SVRA during CDPR surveys. Limited suitable foraging habitat present within the potential tree planting area portion of the project area at Black Lake.	3
		Mamma	als		
pallid bat Antrozous pallidus	CSSC	Throughout California except high Sierra from Shasta to Kern Counties and northwest coast, primarily at lower and midelevations.	Occurs in a variety of typically arid habitats including all types of woodland especially oak savanna and grassland. May also be found in riparian areas and wetlands, orchards, vineyards, and cropland if appropriate roosting sites are available.	Low- Recorded at Oso Flaco Lake and south of Oso Flaco. Suitable foraging habitat within the project area, especially in and around Black Lake in the potential tree planting area. Limited suitable roosting habitat present in the project area.	2, 3
Townsend's big-eared bat Corynorhinus townsendii	SCT, CSSC	Found throughout California, but details of its distribution are not well known.	Roosts in caves, buildings, hollow trees; forages in many habitats. Most abundant in mesic habitats.	Low- No records from in or around the project area. Limited roosting sites present in the project area. Suitable foraging habitat present in the project area.	2
Western red bat Lasiurus blossevillii	CSSC	Scattered throughout much of California at lower elevations.	Found primarily in riparian and wooded habitats. Occurs at least seasonally in urban areas. Day roosts in trees within the foliage.	Low- Migrate through the central coast in fall and spring. Some breeding occurs on the Central Coast, but most breeding occurs inland. No CNDDB records or observations in or near the project area. Limited roosting habitat present within the project area.	1, 2, 3
giant kangaroo rat Dipodomys ingens	FE, SE, FP	Annual grasslands on the western side of the San Joaquin Valley, marginal habitat in alkali scrub.	Needs level terrain and sandy loam soils for burrowing.	None- No records from in or around the project area. No suitable habitat present in the project area.	1
San Diego desert woodrat Neotoma lepida intermedia	CSSC	Coastal scrub of southern California from San Diego County to SLO County.	Moderate to dense canopies preferred; they are particularly abundant in rock outcrops and rocky cliffs and slopes.	Low- No records from in or around the project area. Limited suitable habitat present in the project area	2

Table B2. Special-status Animal Species with the Potential to Occur in the Dust Control Program Area					
Species	Listing Status	Range in California	Habitat	Potential to Occur	Sources
Southern sea otter Enhydra lutris nereis	FT, CFP	Near shore marine environments from about Ano Nuevo, San Mateo County to Point Sal, SB County.	Needs canopies of giant kelp and bull kelp for rafting and feeding; prefers rocky substrates with abundant invertebrates.	None- Has been observed in offshore Oceano Dunes SVRA. No suitable marine habitat present within the project limits.	1, 3
American badger Taxidea taxus	CSSC	Occurs throughout California and the western United States and Canada.	Variety of open habitats with friable soils.	High- Has been observed during CDPR surveys within Oceano Dunes SVRA in vegetation islands and nearby Phillips 66 Leasehold. Inactive badger dens have been observed throughout Oceano Dunes SVRA. Suitable habitat present in the project area.	2, 3, 4

<sup>1</sup>Listing Status Key:

FE - Federal Endangered

FT - Federal Threatened

FPT – Proposed Threatened

SE – State Endangered

ST – State Threatened

SCT – Candidate Threatened

CFP - California Fully Protected

CSSC - California Species of Special Concern

## Sources

- 1. USFWS. 2016. IPaC Trust Resources Report. Report generated July 29, 2016. https://ecos.fws.gov/ipac/project/ KNAYZ-RWWSR-EDZL2-IYOZF-IL2E7M
- 2. California Natural Diversity Database (CNDDB). 2016. California Department of Fish and Game, Biogeographic Data Branch. Last updated July 2016.
- 3. CDPR. 2015. Habitat Monitoring Report. Oceano Dunes SVRA 2011-2014. Prepared by CDPR, OHMVR Division, Oceano Dunes District. March.
- 4. Condor Environmental Planning Services, Inc. (Condor). Alternative Access Study: Oceano Dunes State Vehicular Recreation Area. Prepared for CDPR, Oceano Dunes District. November 15, 2006.
- Personal communication with CDPR staff.

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## change.org

Recipient: California state parks, California Coastal Commision, Oceano dunes svra,

State parks ohv, California State Senate, California State House, Nancy

Pelosi, Dan Canfield, Lisa Mangat, Ed Waage, Heidi H...

Letter: Greetings,

Protect our Camping and OHV rights! Fight to Keep OCEANO DUNES SVRA

stay open!

## **Comments**

Name	Location	Date	Comment
Jesse Jr. Rivera	San Carlos, US	2019-06-26	"California family fun should never have an end"
Amanda Geer	Manteca, CA	2019-06-26	"Amanda geer"
Tony Ventimiglia	Half Moon Bay, US	2019-06-26	"I have been recreationally attending the Oceano Dunes since I was a child. My father attended regularly with his friends and family years before I was even born. It has been a huge part of my upbringing. I have been making the best memories of my life camping and riding there for the past 32 years. I now have a son and I regularly think about the memories that I am excited to make with him in the years to come at Oceano Dunes. I work hard every single day, contributing to the economy, helping my environment and local businesses, much of it with the motivation to obtain the means to vacation with my family at Oceano Dunes. I am only one person and the effect this possible closure would have on me is significant. Just think about all of the other people like me this would effect, all the local businesses in the area and local economy that would be detrimentally affected by this. It pains me to see that this is even being considered."
Taylor Foote	US	2019-06-26	"Been going here over 15 years , it CANNOT get shut down!"
Willie Virgen	Half Moon Bay, CA	2019-06-26	"I don't believe in the wrongful closure of a State Park that has served many California residents (along with outta staters).Our state parks were created to provide us with recreational freedom. To allow us to enjoy the outdoors with family and friends. Why rob the people of that right?"
Emily Musser	Oakton, VA	2019-06-26	"I don't support the unnecessary closure of State Parks that provide recreational areas for locals and visitors alike."
cameron hays	San Luis Obispo, US	2019-06-26	"I don't support the unnecessary closure of State Parks that provide recreational areas for locals and visitors alike."
Matt Rose	Lancaster, CA	2019-06-26	"We should be able to have the freedom to have designated areas for us to enjoy riding. Continuous Closures will cause people to ride in places illigally. We pay our dues for the things we have."
Kayne Groner	Atascadero, CA	2019-06-26	"Its gonna be a huge impact on the economy if this ohv is closed and it's a great place for kids and family"
Jessica Blair	Bakersfield, CA	2019-06-27	"The Dunes is a place for families to gather and have fun and ride while also enjoying the beach. This is something that has been passed through generations of families"
Eduardo Fernandez	Shafter, CA	2019-06-27	"I don't want the park to close down it's good family vacation to ride are bikes"
Faith Dunn	Kerman, CA	2019-06-27	"This is where I grew up and made so many memories and met my significant other and would love to have my kids grow up here as well !"

Name	Location	Date	Comment
Willie Stanley	Coronado, CA	2019-06-27	"Willie Stanley"
Ricardo Hernandez	Bakersfield, CA	2019-06-27	"This will accomplish nothing other than killing Pismo of it's visiting capital to pay off the city's debt. Also It will close all small businesses from loosing its customers base ."
Evan Molette	Atascadero, CA	2019-06-27	"I'm a boss"
Gabriale Menchaca	Bakersfield, US	2019-06-27	"I've been coming to the dunes ever since I was a baby and 4th of July is one of the biggest trips and family tradition that we plan every year. My whole family takes time off from work just to come out here in pismo and without the dunes there is really nothing to look forward to and taking time off and come to pismo. It is up to me and my other cousins to keep the family tradition going later on in life but without the dunes there is no tradition to keep alive. Everyone in the family all has something that we always take out to the dunes whether it's quads, trucks, RZRs, rhinos all those things being able to be out in the dunes makes us all happy but without any of that there is no happiness.#keep the dunes open!"
Bernadette Mendez	Chino Hills, CA	2019-06-27	"My family and I think of the dunes as our second home"
Evan Molette	Atascadero, CA	2019-06-27	"Is this a site a scam � plz let me know"
Kelci Einsele	Visalia, CA	2019-06-27	"I grew up going to this beach area and I now have children that I want to grow up there as well."
Jennifer Andrade	Turlock, CA	2019-06-27	"I support ohv"
David Imperatrice	Madera, CA	2019-06-27	"This place is a staple for many like me and my friends. We have been enjoying Pismo/Oceano SVRA since mid 1990. I actually remember going to Pismo Beach as a kid with my Grandfather and Dad when they went clamming. Please don't take this away from the current generations and those to come."
Christina Montoya	Oakland, CA	2019-06-27	"We care about the dunes and love camping there with our families. WE GOT MARRIED Right there on the beach! The town will go away without all the money and support. When the wind blows not many people are out riding."
Jessica Hill	Tulare, CA	2019-06-27	"We love the dunes!!"
Andrew Blaylock	US	2019-06-27	"It is a fun place to take my family for vacations and enjoy what we love doing most, driving the buggies"
Jon Lawrence	San Jose, CA	2019-06-27	"My Dad, my kids and I have been going there riding making forever great memories and always respect our footprint and left the park as clean or cleaner than we got there. I want my grandkids to experience it as well not just a bedtime story"
Nicholas DeLecce	Sacramento, US	2019-06-27	"This is a beautiful place for generations to come an enjoy quality family time! Been coming to this place sense I was a kid an hope my kids an there kids get to enjoy it as well! ��"

Name	Location	Date	Comment
Stasha Tiller	Fresno, CA	2019-06-27	"This would take away the rights of Californians to enjoy THEIR beach as well as a low cost recreational activity that families can afford!"
Kim Brouse	Santa Cruz, CA	2019-06-27	"My family loves to go here . Lots of great memories"
Korey Gray	Bakersfield, CA	2019-06-27	"I'm tired of politics getting there way and not taking it to the people being they do work for us"
Jeremiah Duran	Fresno, CA	2019-06-27	"It's a great place for family's to have fun"
Tony Bettencourt	US	2019-06-27	"tony bettencourt"
Robert Riegelsberger	Palo Alto, CA	2019-06-27	"To close the dunes to ohv use is wrong. It helps local economy, the invasive plovers seem to do better near campers. Dust near the beach is natural. Live near the beach deal with the dust. It's like moving near an airport or drag stripand complaining about noise, or the dump and complaining about smell."
Nathaniel Faria	US	2019-06-27	"Grew up riding there. No reason to shut it down, when it's been thriving for so long"
Anthony Andre	Hanford, US	2019-06-27	"BECAUSE OFF ROADING IS NOT A CRIME"
Peter Welch	Paradise, CA	2019-06-27	"Because i love riding the sand dunes"
Randi Belcher	Visalia, CA	2019-06-27	"My family has gone here for camping and fun since the 60's, and probably before that! Please don't shut it down."
Angela Ferreira	Hanford, CA	2019-06-27	"Honestly they've been using any reason they could come up with to try and close the dunes, and it's really sad because this place is a landmark for so many people. It draws tons of business to the SLO area and tourism that wouldn't happen without the dunes! Not allowing off-road vehicles would be a huge mistake for so many reasons. Please don't let this happen."
Charlene Cano	Lemoore, CA	2019-06-27	"My family has been enjoying camping and riding out there long before I was born, and now I'm making memories with my kids out there. It would be a shame for this park to be shut down. If it does get shut down, it won't be long the city of Pismo and AG will will surly suffer from not having us beach riders spending our money there."
Aspen Desaire	Modesto, US	2019-06-27	"I'm singing this because I have grown up in pismo. As a kid we went there at least 5 to 6 times a year it was our go to spot growing up. Even now being a grown up I still go quite frequently and have introduced my niece to it as well."
Beatrice Andrade	Parlier, CA	2019-06-27	"I'm singing this petition because I believe the dunes should be open. I have been camping and visiting the dunes for many years and every time I have encountered wonderful people who care and love the dunes locals as well as other traveling from far like myself. Yes there is coinciden and I do care about the dunes . And I want it to be safe and clean just like everyone else . I think that we should have different option instead of just closing the dunes for good . I

Name	Location	Date	Comment	
			think the business and others would agree they depend on travelers and others that's the form of income . Like I said we need to have different option and see what will work . We should all enjoy the dunes and everything it has to offer ."	
Houston Howell	Hanford, CA	2019-06-27	" Generates revenue for the city and it's a way of life"	
Alejandro Gutierrez	Santa Maria, CA	2019-06-27	"The dunes is great time to take the family to and enjoy the beach and have some fun."	
Richard Vandenberg	Exeter, CA	2019-06-27	"I love the dunes and would be devastating if they closed"	
Michael Johnson	US	2019-06-27	"Because I love bring my kids to the beach I grow up on and still work at."	
Aaron Peters	Bakersfield, CA	2019-06-27	"I love camping and riding in the dunes with my family."	
Andrew Olivares	Pembroke Pines, FL	2019-06-27	"I grew up going there camping and riding and spending quality time with friends and family on the beach"	
Larry Vargas	Hanford, US	2019-06-27	"We in California have been nudged into a progressive environmental socialist state ran by a bunch of shit stains who think they know what's best. Instead of individualism we are being rounded up into collectivism. Time to make a stand"	
Nicholas Palma	Nipomo, CA	2019-06-27	"I'm an local resident who likes going to the Oceano Dunes using my OHV"	
Shawna Callahan	Bakersfield, CA	2019-06-27	"I spend a whole lot of time out on the dunes and have never had a bad experience. The settlement that closing the dunes will bring to local businesses will reach farther than imaginable."	
Matt Holloway	Porterville, CA	2019-06-27	"We want our rights back! California governor and Pelosi have taken taken to many of our rights away. We want them back and want them out."	
Jeffrey Rivera	San Carlos, US	2019-06-27	"OHV recreation accounts for a significant part of the local economy. According to a 2016 study commissioned by the park, visitors contribute \$243 million to the local economy on an annual basis, nearly \$2 million of which goes to state and local taxes. According to Suty, up to 3,000 jobs are at stake in the area should the park no longer allow OHV access.https://www.hemmings.com/blog/2019/06/25/california-coastal-organizations.	commis
Benzell Arana Murguia	US	2019-06-27	"This place has left me amazing memories and as a father to be I wish I could take my kids and show them how fun and amazing this place is"	
Greg Stone	Kingsburg, CA	2019-06-27	"Because I grew up on the dunes and so did my kids"	
Pam Borja	Lodi, CA	2019-06-27	"Pam borja"	
Zach Lopez	Clovis, CA	2019-06-27	"The Coastal Commission is a bunch of morons with no common sense."	

Name	Location	Date	Comment
Thomas Nolen	Atascadero, CA	2019-06-27	"My name is Thomas I may not live in state at the time but I have many of memories with friends made from the beaches n great times with my family n friends this place does so much good that I DO NOT. Believe closures or restrictions that are becoming to this great area to be a good this. I can see somethings in recent meetings a good thing to be brought to attention but it's only now after so much bad that they actually are. I don't have a lot of knowledge the whole subject but I know just because some people rant n rant that you feel now something should be done. Our area to ride is small so things are going to happen just as in any sort of scenario. Many locals will not survive. Many business with see closure. Many generations will loose out on what little "freedom" we still have there is enough laws n legislation in all other places put some into play here but not all. Let us ride, let's us be young , let's us live. I BACK THE BLUE. Keep the dunes open keep the local business thriving"
Gilbert Gutierrez	Turlock, US	2019-06-27	"Been going for years with friends, was hoping to start taking my daughter"
Mark Strubbe	Valley Springs, CA	2019-06-27	"So few such areas remain. Preserve this park!"
william reid	templeton, CA	2019-06-27	"Freedom."
Carla Morse	US	2019-06-27	"Carla Morse"
Jeremy Walls	Nipomo, US	2019-06-27	"Keep OHV areas open in California"
Joe Lee	Ladysmith, WI	2019-06-27	"I used to live and play there. I would like to see future generations be able to go offroad instead of being in front of the TV. Also, closing these dunes to off roaders, will put a lot of people out of business and thus making them possibly homeless. In turn, the area will become a ghost town. Many tourists come to the dunes because of the ability to drive on the dunes in offroad vehicles. By closing them, your driving away tourism."
Jarred Dubois	Fresno, CA	2019-06-27	"I love spending time with my family and friends in the dunes."
Joseph Stanley	Santa Maria, US	2019-06-27	"Stop taking traditions and activities to our area!"
Erik Hennesay	Visalia, CA	2019-06-27	"This is a way of life for people, from business to family tradition."
Paul Michaelson	Lompoc, CA	2019-06-27	"Paul michaelson"
Ariel Guerrero	Porterville, CA	2019-06-27	"We grew up ridding there and it will be like taking our childhood away!"
bill pickens	caldwell, ID	2019-06-27	"If you close down designated areas like this , fools will ride in places you dont want them and destroy land, habitat , its easy to patrol ,and get emergence personnel to people if you know where they are. , safer , and if closed think of the los in review to the surrounding community keep it open"
Natasha Romero	Fowler, CA	2019-06-27	"Need dunes to stay open"

Name	Location	Date	Comment
Joelly Justus	Reno, NV	2019-06-27	"I'm signing because I grew up in this area. The dunes are amazing and fun as well as dangerous at times and I understand that but maybe restrictions would be a better outcome rather than a complete shut down. I agree that deep into the dunes is problematic but camping on the beach, driving on the beach, etc is not the issue. Please don't close off the beach entirely and not allow people to drive alone it, camp along it, etc."
Ashley Ramos	Bakersfield, CA	2019-06-27	"We have a family reunion every year in pismo and my kids grew up going here ."
johnny solorio	Bakersfield, CA	2019-06-27	"I want my grand children to enjoy the beach and sand dunes as we have for many yearsthere are other dunes but none like this with an ocean connected to itother dunes are to far for some to reach just for the day"
Brian rogian	Hayfork, CA	2019-06-27	"It should stay open"
James Castro	Fresno, CA	2019-06-27	"It's an awesome place for our family to get together and ride"
Tyler Argentieri	Santa Maria, CA	2019-06-27	"I want to protect the right to off highway vehicle recreation for future generations"
Sarah Riegelsberger	Elk Grove, CA	2019-06-27	"Our family has enjoyed going to pismo for years. Hate to see it closed!"
Tim FINEGAN	Clovis, CA	2019-06-27	"This where we grew up as a family. We so many great memories."
Sam Gailey	Bakersfield, CA	2019-06-27	"I grew up riding here I have taken my babies to ride here and I want them to have the same childhood memories that I had at the dunes. This is a family place where people get together to celebrate to, have weddings just to be friends and family. The people that moved here knew this was here and yet now they want to complain about it that is on them if they don't like it there asses can move."
Alexandria Sumner	Fresno, US	2019-06-27	"The ocean dunes is my second home love it and wanna protect it"
Carrie Robinson	Canyon Country, CA	2019-06-27	"Love going to Oceano dunes."
Larry Andrade	Visalia, CA	2019-06-27	"Oceano dunes are our go to fun place. Mostly because of the off road fun."
Chance Martin	Taft, CA	2019-06-27	"I support your local economy"
Conner Melenbacker	Fresno, US	2019-06-27	"Closing the OHV park will destroy the surrounding area and ruin our chances to take our kids where we've grew up on weekends"
Candy Cantrell	Porterville, CA	2019-06-27	"I've been going to the dunes my whole life. From going with my parents clamming as a child, to a dune buggy and now an RZR. Always an annual trip with friends and family. I want the dunes to stay open!!!"
Matt Brazil	Sacramento, CA	2019-06-27	"My favorite place in the world is being threatened to be closed because of a false premise."

Name	Location	Date	Comment
Francisco Guzman	Madera, CA	2019-06-27	"Oceano dune is part of so many families memories it needs to remain open for ohv."
Kimberly Macias	Bakersfield, CA	2019-06-27	"Please keep pismo dunes open!!!!�"
Luis Hinojosa	Chowchilla, CA	2019-06-27	"Best family trip we make! Please don't shut it down."
Myrna Felix	Pismo Beach, US	2019-06-27	"These dunes have been used as an off-road park as long as mechanized travel has existed. Dust (when the wind blows) has always been present here regardless of Offroad activity and actually spikes during winter & spring, when Offroad activity is at its lowest point of the year. That said, it is asinine to move into this area and expect the entire landscape and financial well being of the area to compromise itself for you, the new guy in town. But it seems that if you bribe enough people, you can get them to agree to anything, no matter how asinine."
Richard Wideman	Portland, OR	2019-06-27	"I grew up on the Central Coast and always loved going out to the dunes with friends and family. Ride Baby Ride!"
Savanna Ford	Grover Beach, CA	2019-06-27	"As a resident and a business manager for a local company, I know that this would have a negative impact on our community if they were to close down the beach."
Adam Carr	San Diego, US	2019-06-27	"Keep the dunes open! Too many riding areas are being shut down"
Kristen Mendoza	Selma, CA	2019-06-27	"My family loves camping and playing on the dunes"
Travis Meredith	US	2019-06-27	"I ride motorcycles."
Henry Rodriguez	Visalia, CA	2019-06-27	"We love pismo dunes always a great time with the family"
Robin Baugh	Nipomo, US	2019-06-27	"Our family has been coming to the dunes since before I was born. We love it so much that we moved here and our kids would be devastated if the dunes were closed"
Sheppard Screen	Belton, US	2019-06-27	"The OD have a mainstay for family activity on the Central Coast. Keep the the area open for future generations!"
xavier martinez	Sacramento, CA	2019-06-27	"This is my favorite camping place we have been coming here since I was 4 years old now we spend an entire week out there every year for our family reunion"
Scotty Wilhite	Riverdale, CA	2019-06-27	"I was sending because me and my family enjoyed going to the coast and riding at the dunes and the cost of commission should not have the ability to override the state or the will of the people"
Danny Foster	Houston, TX	2019-06-27	"Dan Foster"
Scott Rose	Scottsdale, AZ	2019-06-27	"I camp there and love the fact that we can use our off road vehicles on the beach and in the dunes."
John Deleon	Hayward, CA	2019-06-27	"Pismo Beach has been a family tradition for decades. I'd hate to see it go."

Name	Location	Date	Comment
Timothy Dalerio	Kingsburg, CA	2019-06-27	"Best place to ride and the last one that's on a beach"
Sergio Oliveira	Fernley, US	2019-06-27	"So sad damn tree huggers bunch of assholes"
Trisha King	Rancho Cucamonga, CA	2019-06-27	"Closing Oceano Dunes will not only lose the city of Pismo millions of dollars, but it will greatly impact the businesses of the community. This closure will fiscally impact California in negative way."
Olivia Soto	Grover beach, US	2019-06-27	"This city is going to loose out on so much business. Families come from all over to ride on our beaches. Please sign this petition to keep the dunes running!"
lisa tabarez	hanford, CA	2019-06-27	"Our family along with thousands of other families dont want this to shut down! Our kids love it here. If its shut down there will be no reason to come back to the coast."
Misty Pedigo	North Hollywood, CA	2019-06-27	"Camping at Pismo is something I look forward to on a regular basis! It keeps kids out of trouble and gives grown up kids an outlet after working our butts off to make ends meet. I've been riding some kind of OHV vehicle since I was born, and I feel like it is so important to our community to have a safe place to go and do this! Please do not take this place away from the people. There are other ways to make this place safe for everybody involved. Again I beg you please do not take this away from us!"
Daniel Molina	Tulare, CA	2019-06-27	"This place holds many memories with families me loved ones. My parents brought me to the dunes and I am now bring my kids to the dunes"
Tony Paye	Los Angeles, US	2019-06-27	"I grew up with family time that was outdoors camping in the dunes and other OHV places , a place to get out and enjoy time with each other and not indoors. Where families can get together and create memories. The fees we pay to get into the dunes and register our OHV's helps keep them open for out use, please do not shut us out!! Closing down the dunes or shrinking them will not make it better for anyone, birds plants , or people."
Eric Negrete	San Carlos, CA	2019-06-27	"I love the dunes"
Kris Strain	Canyon Country, CA	2019-06-27	"Kris strain"
Sarah Barton	Arroyo Grande, CA	2019-06-27	"We love the dunes! We enjoy taking our kids out for the day and exploring in our Jeep, or even taking our dirt bikes out there so the kids learn to ride on a soft surface in case they fall. We want the dunes to remain open as is; please don't give in!!!"
Lwyn Dahl	Phoenix, AZ	2019-06-27	"Bs to close any thing ever I never asked you to close our public lands"
Misty Eaton	Springville, CA	2019-06-27	"This is where I grew up. On the beach, in the dunes having fun. Please don't end a good thing! Keep it open!"

Name	Location	Date	Comment
Gary Martin	Chino, CA	2019-06-27	"their are just a few places we can ride in the sand. We pay taxes and fees for places like this plus we spend a lot of money in near by towns and in towns in order to get there."
Issa Gharibeh	Westchester, CA	2019-06-27	"It's a place my family and friends go to enjoy camping at. Also everything keeps being taken away, where is a family to go to enjoy nature and spend time together. Please don't close it. A lot of people enjoy that place."
James Claborn	Santa Maria, CA	2019-06-27	"To whom it may concern, Hello my name is James Claborn from Santa Maria, California and I'm writing today to tell you how much the Oceano dune Svra area means to me and why it needs to stay open for everyone to enjoy In addition you need to protect our rights for camping AND OHV use via the Coastal Act. I grew up in Arizona and would always look forward to our trips to the central coast for its beautiful hills, oceans, and awesome weather. We moved here when I turned 18 and It's not cheap living here, especially coming from AZ but it is so worth it being near the beach. I have severe anxiety and depression and was diagnosed just a couple years ago. I'm also a Gay man and have been bullied my entire life, and yes it still continues. The dunes are my escape my home away from home. No one out there judges you or makes you feel bad they all help out and it's a giant family and community. Actually I haven't felt a better connection with any other group then I have with the friends of ocean dunes I've never once"
Miguel Yepez	US	2019-06-27	"This place is for vacation! Very relaxing"
Megann Cochran	Fair Oaks, CA	2019-06-27	"Me and my family love coming out here, nothin but good time from me"
Karen Lopez	Bakersfield, CA	2019-06-27	"I enjoy being able to ride on the beach and the dunes. We don't have enough recreational places to go as it is."
Jesus Matias	Paso Robles, CA	2019-06-27	"The dunes are what makes slo county the best. Without it we won't be known anymore"
Larry Cason	Bakersfield, CA	2019-06-27	"This is public land! Let the public enjoy it!"
Brittany Nixon	Fresno, US	2019-06-27	"My family has been going to these same Dunes for a few generations now. It has always been a place full of great times, laughter and some of the best memories. Now that my son is here and a bit older he is getting to have new experiences and making memories of his own that will last a lifetime. We go to the dunes to not only escape the heat in the central valley but also the horrible air quality. Oceano gives a chance to breathe in the crisp fresh air and enjoy the great weather. There are many many families who have developed generations long traditions by coming out here religiously, they bring their money and fund local business, boosting financial stability to Oceano and Pismo and areas surrounding."
Rodney Silva	Visalia, CA	2019-06-27	"40 years and counting"
Devan Mallory	Dansville, NY	2019-06-27	"I think we'll maintained campgrounds are more beneficial to a wide range of people!"

Name	Location	Date	Comment
Chris Conner	Santa Rosa, CA	2019-06-27	"My parents took us here as young kids and now I've been able to share it with my children. It's a family tradition to camp and ride in the dunes. I don't want my girls to miss out on this as they get older."
David Foti	El Cajon, CA	2019-06-27	"This is a great family place to enjoy."
Troy Baker	US	2019-06-27	"I go over to Oceano dunes 5-6times a year to ride on the dunes. Divorced my wife there, it holds a special place in my heart.only place to ride on the beach in cal. Going since 1970. Don't let them do this to us!"
Ladonna Garrison	Fresno, CA	2019-06-27	"I believe the dunes should stay open. Our family has been going there for years."
Sherial Hudgins	Post Falls, ID	2019-06-27	"I am from Cali and we spend family time there."
Austin Frerichs	Lompoc, CA	2019-06-27	"The dunes is the best part about SLO county."
Shelby Moya	US	2019-06-27	"I have not yet experience the dunes. I hope it remains open."
Perry Sparks	Las Vegas, NV	2019-06-27	"I've been going to pismo duns sense the 80s it's a sad day when a small group of people get to decide what a much large group gets to do. The people ride ohvs respect this beach more than the people that go for holiday weekends. Look at the beach that they do not ride ohv after the holiday. Then decide who you should stop going to the beach."
Shelly Hoover	Madera, US	2019-06-27	"I started going to Pismo when I was 8 with my parentslater introduced my own family to the dunes/children/grandchildrenthis has always been a place to relax, have fun, and make lasting memories"
Steven Stanghellini	Queen Creek, AZ	2019-06-27	"Our recreation areas are decreasing. Keeping a recreation area open is a great way to keep young ones out of trouble and bring families together."
Ruth Stratton	Bakersfield, CA	2019-06-27	"Many wonderful memories have been made at Oceano Dunes. Please don't keep us from making more beautiful memories!"
Lane Brown	Harker Heights, TX	2019-06-27	"I'm come down from Texas just to come here! I grew up coming here 2-3 times a year for weeks at a time"
william gallegos	US	2019-06-27	"I would like to keep the dunes open for future generations to enjoy."
Andrew Fox	Escondido, US	2019-06-27	"Need to stop the politicians from controlling our land! Leave the dunes open for all to enjoy!"
Chris Drager	santa maria, CA	2019-06-27	"I believe it's our right to have full access to this land to be able to camp with our families on the beach. You have already taken a large portion to the south of the dunes along time ago. If this land is taken away lots of businesses will absolutely suffer and will go out of business!"

Name	Location	Date	Comment
Emily Russell	Henderson, NV	2019-06-27	"Because the right to harmless, recreational fun should NOT be taken away! "We hold these truths to be self-evident: that all men are created equal; that they are endowed by their Creator with certain unalienable rights; that among these are life, liberty, and the pursuit of happiness.""
Kayleen Shultz	Coarsegold, CA	2019-06-27	"To keep off-road riding allowed on the dunes"
Estes Cathy	Santa Rosa, CA	2019-06-27	"The people who bought their homes near the dunes knew what it is used for. Why do they get to change the rules after the game is already in progress."
Jeremy Ellis	Oceano, CA	2019-06-27	"It would cause so much harm to the 5 cities and Surrounding areas"
Jason Camp	US	2019-06-27	"I've been going to the dunes since I can remember, some of my best childhood memories were made there. I'd like to continue that tradition with my children as well."
Donn Case	Kingsburg, CA	2019-06-27	"Because it should remain open."
Yoan Ceballos	Ivanhoe, CA	2019-06-27	"California is turning into puss land"
Tamara Hawthorne	Visalia, CA	2019-06-27	"I've always loved the opportunities we had to camp and ride on the dunes. My family and I were just talking about a vacation camping on the beach and it would be a shame to lose out on that privilege."
Robert Graham	Portland, US	2019-06-27	"I'm from there and riding dunes is family tradition"
Josh Luke	US	2019-06-27	"I grow up in pismo"
Sandra Meier	Porterville, CA	2019-06-27	"We love the bunes. It's a great place for family and friends to hangout and make memories."
Matthew Welty	El Cajon, US	2019-06-27	"KEEP IT OPEN"
jacob campbell	Mesquite, TX	2019-06-27	"Because I love the dunes"
Frank Freitas	Lakewood, CA	2019-06-27	"The Pismo Beach Dunes saved me from a life of drugs and crime!"
Justin Mcmillian	Pleasanton, US	2019-06-27	"It's not cool to take are riding"
Parker Henderson	Oceano, CA	2019-06-27	"I want our dune rights to be protected the public should have the right to use OHV on the dunes"
John Raviscioni	Madera, CA	2019-06-27	"I've road here my hole life and my kids should get the same privileges that I got. THATS A TAX PAYERS RIGHT."
Jenn Sanders	Klamath Falls, OR	2019-06-27	"This us an awesome place"
Cody Repo	Atascadero, CA	2019-06-27	"The dunes are a huge part of living on the central coast! Huge revenue for local business! Don't rob our children of this great place"

Name	Location	Date	Comment
Benjamin Jeremias	NAPA, CA	2019-06-27	"We need to keep pismo / oceano dunes open to OHV"
Kasper Carlson	Keno, US	2019-06-27	"Stop taking from us Oregon fokes that like to live other than gay part land"
Clem Lessi	US	2019-06-27	"It's Bullshit they take our registration money and then close the dunes with it"
Dhi kifjjr	Plainfield, IL	2019-06-27	"Keep our dunes open"
Susana Vieira	Tulare, CA	2019-06-27	"My family and I have been camping on Pismo dunes for years. A fun place to camp, spend time with family and friends. It saddens me that Pismo dunes will close and we have to find another place to camp when you have a view of the beach from our RV. Please keep the dunes open!"
Grant Orton	Sanger, CA	2019-06-27	"My family has been going to pismo for 30+ years. I have made life long friends their. Their is not another place you can visit and find as many good honest people as you can in the dunes"
Brandon Magri	Clovis, CA	2019-06-27	"I've been camping in the dunes for 20+ years. It's a shame that people are blaming dust on OHV's."
Martin Mulverhill	Hanford, CA	2019-06-27	"I have been going to the Oceania dunes since I was little riding my dirt bikes camping every thing. When we go we always spend money in the coastal towns to give back to the small businesses there. If they close this then all those small business will end up going out I think that's wrong and I think there needs to be change in this shit ran state!!"
Alex Barnett	San Jose, CA	2019-06-27	"I love the dunes always have it shouldn't be closed you know California is really just taking away things for honest people to do"
Carolyn Wilson	Exeter, CA	2019-06-27	"I dont want the dunes shut down"
Chris Ruiz	Guadalupe, CA	2019-06-27	"Keep it open let us enjoy the dunes"
Dean Anrig	Sunol, CA	2019-06-27	"This place is our home away from home. I honestly can't count all of the amazing memories we have at the dunes. Please don't close our paradise!"
Vanessa mandala	Chowchilla, CA	2019-06-27	"The ONLY place our family vacations is the Pismo Oceano Dunes we love it there our kids have all been riding since they were small and we need to keep this wonderful place open!!"
Garrison Miller	Weatherford, TX	2019-06-27	"I grow up riding in the dunes and would like for my kids to be able to"
Shannon Duncan	Bakersfield, CA	2019-06-27	"I've been going to Oceano since the 70s . It's a STATE PARK designated for OHV use. Keep it that way"
MICHAEL CONTENTE	Modesto, CA	2019-06-27	"Keep the recreation area open"
shauna stokes	oceano, CA	2019-06-27	"Its bad for the economy. Alot of jobs and business will be lost."

Name	Location	Date	Comment
Michael Enciso	Nipomo, US	2019-06-27	"There are many different impacts getting ride of the ohv it doesn't only take away a activity from people but it also is taking away from general communities around oceano dunes it's a tourist attraction that bring hundreds of people around and give fun And enjoyment for many while it also provides jobs to the area as well its gonna have a huge impact on numerous amounts of things"
Eimy Ponce	Bakersfield, CA	2019-06-27	"My family loves camping out! It's amazing to have somewhere so unique to take our girls."
Greg Mead	Delhi, CA	2019-06-27	"I love the dunes"
Lisa perrin	Lodi, CA	2019-06-27	"My family loves Oceano Dunes and we visit several times a year- it's become a tradition and we look forward to every trip."
RENE FRANKLIN	Paso Robles, CA	2019-06-27	"This is my favorite spot to go!!! The best ever!!! Please do not shut down!!!"
Shannon Spencer	US	2019-06-27	"I've been there once and i loved it."
Luis Sotelo	Arroyo Grande, CA	2019-06-27	"It is fun when youbare carefull."
Otis Hanna	US	2019-06-27	"I can"
Jeremy Soule	Grover Beach, US	2019-06-27	"I've been coming to the Oceano Dunes for longer than I can actually remember. My family and I recently relocated here to the 5 cities. One of the reasons for wanting to relocate here is the dunes and being able to take my family out here to ride and camp. It is a great way for families and friends to get together. There are a lot of great groups associated with the dunes that do a lot of good for this community."
Blake Giarratani	Modesto, CA	2019-06-27	"I am signing this because I want the small businesses around Oceano to stay open and also so I can continue my family tradition of going to the dunes to ride."
Seth Freeman	Sacramento, US	2019-06-27	"I grew up in those dunes. It's like a second home. Took our kids for the first time this year. I would love for them to grow up with the dunes and riding in the dunes like I did."
Stephanie Moore	Enid, US	2019-06-27	"I've been going there since I was a baby in diapers . My family grew up there . My last memories are riding in the sand dunes before my grandpa passed away. It's our right of passage. Our roots . We love it & want to continue that with our grand children for years to come"
Tyler Seaman	Orcutt, CA	2019-06-27	"I've grown up going to the dunes all the time making memories with family and friends. It's something everyone and future generations need to experience and enjoy."
Benjamin DeLosSantos	Sacramento, US	2019-06-27	"Then going to the dunes for years not just riding but camping to love for my kids to share with their kids."
Starr Medina	Redding, US	2019-06-27	"We will lose jobs and funding for our beautiful beach town ."

Name	Location	Date	Comment
Ricky Alvarez	La Verne, CA	2019-06-27	"I been riding here all my line and want to keep riding with my grand kids."
matt johanson	Antelope, CA	2019-06-27	"Oceanic dunes is a great place and I want my kinds to take their kids there and make memories!!"
Madilyn Koelewyn	Fresno, CA	2019-06-27	"To prevent the dunes from closing"
Sarah Wilcox	Bakersfield, CA	2019-06-27	"Our family loves camping on the beach!!!"
Nicole Bissell	Hemet, CA	2019-06-27	"Great family fun"
John Lindquist	Visalia, CA	2019-06-27	"It's a place that has been a tradition for a lot of people to go have a great time enjoy the beach and camping with family and friends that are family we all love it it's home for a lot of our time."
Alyssa Mandala	Sacramento, US	2019-06-27	"I have been going to Oceano Dunes since I could walk! My family always rides in the dunes at least 5 times every time we go. It makes Pismo Beach even more fun for people of all ages. To get rid of it would make so many people upset, as well as a lot of businesses go out of business. Signing this petition and sharing this to social media is the least I could do to help!!"
Shane Strange	US	2019-06-27	"Shane strange"
zalien risley	Atascadero, US	2019-06-27	"It's fucked"
Matt Bylund	Campbell, US	2019-06-27	"I don't agree with the closing of OHV use in the park. Everyone should have access to the park including those who want to use it for OHV use. OHV users have rights in CA too!"
Cody Kelsey	Grover Beach, CA	2019-06-27	"My family, and friends love the Oceano Dunes OHVRA! Please don't take this away from them. Its what they love about this area! Talk about diversity we're the only place in California like it! Because of the dunes, we are diverse. We will also lose tons of revenue, and businesses will suffer. Please don't ruin this area for your "agenda" it's OUR agenda! Thank you!"
Fabian Aguilar	Delhi, CA	2019-06-27	"I want to take my kids riding at Pismo beach."
Save Pismo	Poway, US	2019-06-27	"Last week wad my 4th year there i love pismo"
Brian Sotelo	San Jose, US	2019-06-27	"Keep it open!"
Richard Derflinger	Riverside, US	2019-06-27	"I agree with the post."
Brian Hedstrom	Madera, CA	2019-06-27	"I want to keep Oceano Dunes SVRA open for all."
Carlos Rodriguez	Menifee, CA	2019-06-27	"I love our off road trails"
Brandon Spry	Bakersfield, CA	2019-06-27	"The dunes have always been a great place for me and my family to vacation at! They need to stay open!"
Alex Alvarez	Santa Maria, CA	2019-06-27	"H"

Name	Location	Date	Comment
Daniel Sanchez	Tulare, CA	2019-06-27	"You can't shut it down!"
Kimberly Thatcher	Pomona, US	2019-06-27	"I have been going to The Dunes for over 40 years now ��## Please please don't shut the Dunes down �"
Jeffrey Bell	Oakhurst, CA	2019-06-27	"I grew up on the dunes as have my kids. This so many memories are made in Pismo. We spend several weekends a year there as a family. Enjoying the dunes as well as what the town of Pismo has to offer. It's hard to imagine not having tur "pismo trip" to look forward to anymore."
Susan Campiotti	Los Banos, CA	2019-06-27	"Keep the dunes open"
Alejando Solorio	San Jose, CA	2019-06-27	"I go there"
Amy Martinez	Ventura, CA	2019-06-27	"I strongly believe Pismo Dunes should remain open"
RANDY HORTON	Bradenton, FL	2019-06-27	"Randy Horton"
Kristina Sinay	Nipomo, CA	2019-06-27	"As an annual California State Parks pass holder I want to protect my rights to use the ODSVRA as it was sanctioned by California State Parks."
Alexander Rodoni	US	2019-06-27	"Love this OHV place"
kelly teeter	Porterville, CA	2019-06-27	"This is a great place to go with family"
Stacie Roeder	Coarsegold, CA	2019-06-27	"An unelected board is dictating the use of public property. The board is representing the interests of a few vocal homeowners who knew about the dunes, dust and environment when they moved in. They even signed a waiver!! If this is allowed to happen, beaches throughout CA will become off limits to the public."
Mitchell Oliveira	Oakland, US	2019-06-27	"This is a place my family has lived and visited for many generations I would love to take my child here one day and show him the same experiences my parents showed me."
uriel sandoval	Bakersfield, CA	2019-06-27	"Uriel Sandoval"
Chad Campbell	Menifee, CA	2019-06-27	"Every body that goes out with the family is not bothering nobody. The people that live around there will allways comeplain about the sand blowing in there back yards when it shuts down or not ."
Debbie Stillwell	Visalia, CA	2019-06-27	"This has been a favorite family spot for 5 generations!! And its not just mine, so many families look forward to going there. Please dont shut it down."
Josh Stumbaugh	Kettleman City, CA	2019-06-27	"Keep oceano open!"
Jeff Taylor	Reno, NV	2019-06-27	"If we respect the land we ride on why would you take it from us"
Levi Thompson	Tulare, CA	2019-06-27	"Me and my family and kids have grown up going to the beach almost everyday driving on and enjoying what the dunes had to offer"

Name	Location	Date	Comment
Jessica Sindell	Tehachapi, CA	2019-06-27	"I'm signing because not only does this area create amazing memories for the families that vacation there, but it brings in a huge amount of money for the local economy!"
Kelvin Le	San Jose, CA	2019-06-27	"We love this. Place. Go there every year"
Stacie Perez	Fresno, CA	2019-06-27	"Stacie Perez"
Robert Garcia	Santa Maria, CA	2019-06-27	"Keep the dunes open. We all deserve a say in this. Not just a few heads that think the ban of off road vehicles is the way to go. That's taking away the fun and the whole point of going to the dunes I've been going for years and hope this petition makes a difference. You're damn right my vote is NO on the ban and I'm not changing my mind."
Jeff Weaver	Sacramento, US	2019-06-27	"California officials need to understand we Americans are tired of being told how to recreate and live our lives. Many of us, unless sneaking across the border, pay fees and taxes to enjoy the operation of these parks. Stop dickin with our rights and freedoms."
Mike Maisel	Stockton, CA	2019-06-27	"I've been going to Pismo for 40 years this is complete bullshit. There is no reason to shut this place down. All u are doing is depriving people of fun and memories. Go save a whale"
Jason Gomes	Los Banos, CA	2019-06-27	"To keep it open"
Lacey Eckstine	Seaside, US	2019-06-27	"I love pismo!"
Christopher Barnes	Sumter, SC	2019-06-27	"Keep it open for the public."
james rounds	West Hollywood, CA	2019-06-27	"The air quality problems have nothing to do with off roading in the dunes. This is a natural process."
Brian ratliff	San Ardo, CA	2019-06-27	"I have been going to the dunes and enjoying them since I was a kid and my kids should be able to do the same. This is also going to affect people's livelihoods and income to a community"
Sarah Maness	Julian, CA	2019-06-27	"We love to camp there and ride, don't want shut down"
Melanie Highfilll	Fresno, CA	2019-06-27	"I do not want my rights taken away. Camping and riding is a great outdoor family time. My kids loved that we took the camping and riding when ever we could. We spent quality family time with no phones or tv's to get in the way."
Kathy Forgnone	Bradley, CA	2019-06-27	"We have the right to keep our family traditions and pursuit of happiness in enjoying the dunes for years to come. There are very few places to enjoy our sport. The original 15,000 acres at Pismo Beach has been reduced 1,500 and less due to dust control."
Jeff Wheeler	Las Vegas, NV	2019-06-27	"Please keep our dunes open"
judith gluskoter	Bakersfield, CA	2019-06-27	"I agree!"
STEVE ALVISO	Cool, US	2019-06-27	"The beach is ours. Always was and still should be. Have been going there since early 60s"

Name	Location	Date	Comment
Tanesha Winningham.	Paso Robles, CA	2019-06-27	"Stop it"
Andy Hernandez	Moreno Valley, US	2019-06-27	"Oceano dunes have been a part of my life for a long time. I was always more than happy to pay my camping fees and did my part to clean up as much as I can. Camping at this location has become a family tradition. I am willing to do what it takes to keep Oceano SVRA open. For example, start weekly clean ups or even be ok with an increase in camping fees. I truly believe the revenue this location brings in would continue to be a benefit the conservation efforts. Thank you and I will continue to do my part"
Tony Garcia	Discovery Bay, CA	2019-06-27	"My family grew up in pismo, it ia now my family favorite place to visit, camp and ride ohv. My 6 and 8 yr make it a point to spwnd their birthdays there. It is a piece of heaven"
Meghan Gretsinger	Lodi, CA	2019-06-27	"My family and my husband's family have camped out there for years. Many happy memories and we want to bring our kids out there and Have them make their own memories."
Sabrina Johnson	San Luis Obispo, CA	2019-06-27	"This is going to hurt the economy and local businesses! This where locals and tourists come to enjoy a nice time with family and friends."
Casandra Johnson	Grover Beach, CA	2019-06-27	"Leave our beach open!!!!!"
Jesus Camarena	Columbus, US	2019-06-27	"Protecting our camp and HOV rights"
Tracie Baker	Bakersfield, US	2019-06-27	"Don't close it!! So many people love it! Our whole family go all the time!!"
Isaiah Rojo	Santa Maria, CA	2019-06-27	"I"
Amy McLaughlin	Libby, MT	2019-06-27	"I grew up going here. Spent my first birthday here."
Patrick Nine	Stockton, CA	2019-06-27	"This beach is an amazing area for families to get together"
Nancy Goertzen	Visalia, CA	2019-06-27	"This belongs to us all."
Keith Krebsbach	Columbus, NE	2019-06-27	"Off road riding is a way of life and can be a right of passage passed on from generation to generation. It can teach youngsters to take care of land and always pick up after yourself and others! I rode when I was young and got hooked until I started using drugs and now I'm back 4 wheeling and staying off drugs. It works for me and many others. We need to keep all riding areas open and always be responsible and respectful!!"
Marcy Lewis	Lindsay, CA	2019-06-27	"I grew up racing sand rails with my family at those dunes. Charge money if you need to, to keep it clean, but keep it open!"
Nikki Bailey	Shafter, CA	2019-06-27	"I grew up going to the beach. I raised my kids riding there too. I want my grandkids to have the same chances."
Pamela Van Eck	Arroyo Grande, CA	2019-06-27	"Our family has so many great memories and would hate for the Dunes to be closed off to us."

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Yohan Morgan	Santa Clarita, CA	2019-06-27	"State parks belong to the people and is the only remaining coastal dune which allows ohv use for decades."
Jennifer Marroquin	US	2019-06-27	"I wasn't to keep the dunes open for riders and family fun."
Dennis Menor	Porterville, US	2019-06-27	"Oceano Dunes SVRA has been a great getaway spot for friends and family. We've came here since the 90's when I was a young boy and now have passed down the tradition to my kids. Please do not close this place down."
mike argentieri	santa maria, CA	2019-06-27	" Me and my family and going again since 1981 some of my best memories and my family and my children's best memories have been spent at the dunes .This is the way me and my kids relax and have fun"
Lawrence Simas	Sacramento, CA	2019-06-27	"Lawrence Simas"
Lindsey Garcia	San Jose, CA	2019-06-27	"Because. Pismo!"
Bob Ward	Visalia, CA	2019-06-27	"It's a place for family's to enjoy and make memories that will last a lifetimes"
Jeff B	Texas	2019-06-27	"I want to!"
Marcos Buenrrostro	Santa Maria, CA	2019-06-27	"Fuck Liberals ,"
Marilyn Tovar	Colton, CA	2019-06-27	"Oceano Dunes is a sacred place im my heart. I've been coming to this beautiful beach for over 6 years. My kids have always came on their first trip from 2-4 months of age. It's a tradition for us. Seeing this beauty close will be like loosing a part of our family. It brings us together from long and far."
David Arsinous	Simi Valley, CA	2019-06-27	"I love taking my family here for camping and ride please don't shut down . Just think of all the tax revenue you will lose."
Terry Gordon	Puyallup, WA	2019-06-27	"I'm from the coast"
Scott Bertsch	San Jose, CA	2019-06-27	"It's a great family place where our love of nature and bonding come together in the form of excitement, methane exhaust, speed and horsepower So many skills learned by children of current, past & future riders. It's a shame such a beautiful, natural place that has been used by ATV enthusiasts for decades and places of vegetation have thrived, in places of human interaction Creating habitats for native species I personally have never hit any living mammals while there as well as a majority of the people signing this petition California has lost their marbles"
Mario Bautista 2	Anaheim, CA	2019-06-27	"I haven't had the chance to explore it yet"
Andy Castaneda	Bakersfield, CA	2019-06-27	"Been going since I was a kid in the 70's. Been taking my family for the last 21 years"
Clyde Massengale	Danville, CA	2019-06-27	"That is the people's land"

Name	Location	Date	Comment
Margaret McLean	Arroyo Grande, CA	2019-06-27	"It's true our community will be in ruins between the beach closing and Diablo !"
Randy Sutton	US	2019-06-27	"Just another right being taken away, should be ashamed"
Susan Breshears	Santa Maria, CA	2019-06-27	"My family loves this local area it is one of the few things we can do together as a family that is affordable."
Travis Mcpherson	Beaumont, CA	2019-06-27	"Travis McPherson"
Brittnee Szuh	Fair Oaks, CA	2019-06-27	"So many memories that I don't want gone �"
Natalie Rubin	Los Gatos, US	2019-06-27	"Going camping on Pismo beach has become our family tradition and we would be devastated to have that taken away!"
Alma Mayoral	Huron, CA	2019-06-27	"Memories are created here, we spend time with our families and friends. We tell campfire stories to make it exciting"
Mattt George	Taft, CA	2019-06-27	"Keep it open."
Lisa gibson	Altadena, CA	2019-06-27	"My family and I have been going there for ever it's he so many memories not to mention how many business will have to close"
Anthony Leon	Agoura Hills, CA	2019-06-27	"I learned to ride bikes in Pismo and have been riding there since I was 10 years old"
Robert Driver	Roseville, CA	2019-06-27	"Too many good memories and annual family get togethers are held there don't take that away"
Carolyn Fagundes	Porterville, CA	2019-06-27	"For Jerry Fagundesmy cousinand for all the people who follow the rules and pickup after themselves"
Jason Araki	Tulare, CA	2019-06-27	"One of my most fond memories as a kid was going to the Oceano Dunes and riding our quads. Please don't take this pastime away from thousands of families and friends who help support the SLO county economy all year long!"
Cacy Frazier	Woodlake, CA	2019-06-27	"Cacy Frazier"
Liz Rogers	Riverdale, Guam	2019-06-27	"It's a good family place and if u close it will affect the town's and people's lives."
Matt Thompson	Santa Maria, CA	2019-06-27	"The dunes is a great place to take the family and spend quality time together."
Chad Johnson	San Miguel, CA	2019-06-27	"Braaaap"
mike rice	cypress, CA	2019-06-27	"Keep lands open to Off-road vehicles and expand oceano dunes. Closing this will destroy the local economy."
Jason Yescas	Santa maria, CA	2019-06-27	"Keep the dunes open"
Lisa Fullbright	Fresno, CA	2019-06-27	"I love pismo and riding is amazing addition to pismo and being able to camp and ride is just a family tradition."

Name	Location	Date	Comment
Ryan Delgado	Hanford, CA	2019-06-27	"It's wrong to close public lad"
Dan Scroggins	Porterville, US	2019-06-27	"I own ohv's and tired of all the BLM land being closed down leaving riders nowhere to ride."
Christine Frank	San Francisco, CA	2019-06-27	"Public lands for public use. Denying people the right to use public lands that are managed and monitored because special interest groups are concerned about the ramifications to surrounding areas will only force people into those areas where more damage may be done."
Alyssa Solano	Fremont, US	2019-06-27	"I love visiting the dunes , my kids love it main family trips happen at the dunes"
Kristina Fabela	US	2019-06-27	"I love the dunes lots of good memories there"
Luis Martinez	Compton, CA	2019-06-27	"Pismo beach is a getaway from the city family fun relaxing place that my family enjoys two to 4 times a year"
Jordan Simpson	San Antonio, US	2019-06-27	"Going riding in the dunes is a long family tradition for my family and many many others."
Joseph Perlsweig	Woodland Hills, CA	2019-06-27	"Don't take away this legendary recreational area."
Denisse COrtez	Santa Maria, CA	2019-06-27	"Im signing because we need to be represented. We love riding on the Dunes and pay enough taxes to have a right to."
matthew lopez	Fair Oaks, CA	2019-06-27	"The Dunes is an amazing place for the people and their families. This land belongs to the people and we want it to stay open"
Cheyenne Burden	Arroyo Grande, CA	2019-06-27	"It's not our faults (the locals) get punished because out of towners can't abide our laws and regulations."
Gavin Lawson	El Cajon, CA	2019-06-27	"Because fuck the government #shredtillyourdead"
Joseph Fisher	Porterville, CA	2019-06-27	"Pismo is an awesome place to hit the dunes and spend time with family."
Mrs. J Groom	Casper, WY	2019-06-27	"I'm signing because i support; Protect our Camping and OHV rights!"
angel Gallegos	Dublin, CA	2019-06-27	"I'm signing because our family loves to camp, ride and shop oceano. We usually camp in large groups with other family and friends. We bring in money by shopping local several times per year."
Ann Ward	Bakersfield, CA	2019-06-27	"That Beach Belongs to the people"
Naomi Pryor	Atascadero, CA	2019-06-27	"This is our favorite place to vacation, it's been our family tradition for years to go for Thanksgiving and my sons birthday so many memories, this place is amazing"
Denise Cerutti	Patterson, CA	2019-06-27	"Oceano dunes is family fun! Don't take it away �"

Name	Location	Date	Comment
Kathy King	Riverdale, CA	2019-06-27	"I feel the dunes create amazing family time and should remain open for our future children can experience the love of the dunes"
Brent Zimmerman	Syracuse, UT	2019-06-27	"Because I have been going to the dunes for 38 years. Pismo Beach would die if they closed the dunes"
Jose Lastiri	US	2019-06-27	"Joselastiri"
Victoria Campbell	Padre Island Ntl Seashor, US	2019-06-27	"I love it there! Always have"
gayle silveria	Santa Maria, CA	2019-06-27	"We want the dunes to continue for many generation to come. It is a family park and belongs to the people, it generates an enormous amount of income to the area. No can control the dust generated by normal nature, wind, and normal drift. Save our dunes, for our families"
Robin Pinto	Dos Palos, CA	2019-06-27	"We need all the outdoor recreation places we can get. Closing this would be devastating to families and businesses."
Cavin Horton	Bakersfield, CA	2019-06-27	"My family and friends have been riding at oceans dunes since we were kids. I want my grandkids to experience the dunes. We love to ride there and we experience all of the shopping and restaurants in pismo. Closing of the dunes would devastate the city of pismo financially."
robert balcioni	san francisco, CA	2019-06-27	"Mu family has many memories there and if it closes where are people going to go Too much is closing these days"
Ray Chavoya	Lompoc, CA	2019-06-27	"Keep family friendly ohv open"
David Van Neman	US	2019-06-27	"I'm 44 years old. I grew up in Bakersfield and went to Oceano to ride and camp with my family nearly every other weekend. The people who do the same care about the environment and the people who live there. Please keep this open for other generations to enjoy. For other generations to spend time with like minded people. Don't forget about the revenue that Oceano and Pismo get every year for the people who visit the Dunes. 2016-2017 fiscal year was 243 million dollars. That money goes a long long way. That was just from people visiting and utilizing the OHV Park. I pray this does not get shut down. I enjoy bringing my family there to enjoy what I did as a child."
tabatha Oliveria	lemoore, CA	2019-06-27	"This is a great get away for families on a budget. There is no where else in CA that I can take my kids for a weekend at the beach without spending hundreds. This is a place to relax, make memories and play."
Joshua Williams	Bakersfield, CA	2019-06-27	"This is a one of a kind beach and where I'm from camping on that beach and riding is almost a right of passage, it should never be closed or restricted"
Jason Rowles	Litchfield Park, AZ	2019-06-27	"I'm on offroad and camping enthusiast and any closer is a closer I don't want."

Name	Location	Date	Comment
Joe Lyons	Santa Barbara, US	2019-06-27	" I'm signing because I'm in a club of amazing environmentally friendly dune buggy owners that would really hate to see this place go away. It's part of history and it would take away a piece our hearts."
Melissa Dutra	Sonora, CA	2019-06-27	"My family and I love Pismo and come every year!! It's our favorite place and love to camp and ride on the beach!!"
Andrew Minnala	Pinon Hills, CA	2019-06-27	"I'm an american california citizen that pays too much tax's to camp and play on Oceano Dunes and it is my right as an American to enjoy our public lands."
John Adams	Glendora, CA	2019-06-27	"We need Offroad and camping areas!"
Gary Inman	Morgan Hill, CA	2019-06-27	"Sick of the tyranny that this state and local governments continue to inflict on us"
Brandon Wilson	Visalia ca, US	2019-06-27	"Out of the hundreds of miles of shore line we can have 5 for some fun!!"
san saechao	visalia, CA	2019-06-27	"To save the dunes , were tons of memories are made"
Randy Porter	Huntington Beach, CA	2019-06-27	"I ride"
Jose Gonzalez	Nipomo, US	2019-06-27	"My Family and Freinds have made found memories here would be devastated to see this place go so please let's not let this happen So that we can all be able to make fun and loving memories with those we care deeply about just makes it more of a special place than anything where alse can you surf the sand on four wheels in CA"
Brian Bosque's	Citrus Heights, CA	2019-06-27	"You can ride all over the beaches in Oregon. There is very little places left to ride on the beach in California. With out Pismo riding I feel like it would put a huge hit on the local tourism"
Liliana Hernandez Hernandez	King City, CA	2019-06-27	"Liliana Hernandez"
ronna smith	US	2019-06-27	"Ronna smith"
nick psomas	Redlands, CA	2019-06-27	"F the po-lice"
Michael Knight	Surprise, US	2019-06-27	"I ride"
jennie ruiz	porterville, CA	2019-06-27	"It's important to have recreational sites we can access"
Justin Graves	Vacaville, US	2019-06-27	"Everyone needs to get involved, this is a great family hot spot!"
Cristal Jimenez	Stockton, CA	2019-06-27	"I grew up coming to this dunes. Made so many memories here. Now I'm bringing my son who's 9 and he's able to experienced what I did. Don't take this away."
David Martins	San Carlos, US	2019-06-27	"David martins"

Name	Location	Date	Comment
Jeff Anagnos	Lodi, CA	2019-06-27	"My family and friends want to create many more memories at pismo!!!"
Gabriel Herrera	Delano, CA	2019-06-27	"Enjoy the use of the dunes"
Todd Correll	Mission Viejo, CA	2019-06-27	"Don't close"
Autum Coyle	Bakersfield, US	2019-06-27	"The dunes have been a family vacation spot since I was young, I've made many memories and hope one day my future family will be able to make the same memories as I have with me family"
Kerri Jean	Magalia, CA	2019-06-27	"I grew up driving and camping all summer long. It's a unique tourist attraction and 5 cities can't afford to lose this income."
Julie krogh	Vista, CA	2019-06-27	"I have recreated the for over 40 years and want to continue to do so."
Merlyn Frank	Bakersfield, CA	2019-06-27	"We need places to ride and take our families outside to explore."
Justin Pinho	Sunland-Tujunga, CA	2019-06-27	"I'm signing this petition because this issue has been very one sided since the beginning of the end of oceano dunes svra. Nowhere has a "smoking gun" been found that directly relates particulate matter and ohv use. These studies seem to be in favor of the party funding them and not non bias as they should. I feel every registration paying off roader should be apart of a class action lawsuit against the CCC and state parks for mismanaging tax funds for purpose of appeasing a few."
Rick Beekman	Portland, OR	2019-06-27	"This is very important to keep the dunes open to off road vehicles. This is a "sport" that has been the hobby and an important part of many peoples lives for over 50 years. This is a recreation area for people to enjoynot to be blocked off an isolated from the public. This is a very large part of the economy of the area, the dunes need to be kept open for off road vehicle use for all to enjoywhy even bother to "protect" something if no one can EVER enjoy it? No one wants to walk out in the dunes, or ride horseswhat is the point of even living on the planet Earth if, one by one, absolutely EVERYTHING you enjoy in life is taken away from you?"
Rachel Smith	Bakersfield, CA	2019-06-27	"We come here to camp and enjoy our public lands as Free Americans. Our government needs to stop taking our freedoms away. Instead of reducing the number of reservations, how about we expand the fence line out to allow for more open riding, making it less crowded. Putting a curfew on night riding is preposterous. Again, we are Americans. Stop taking away our freedoms. I'll be happy to take my family elsewhere to camp and spend our freedoms and money elsewhere!"
Cody Larson	Concord, CA	2019-06-27	"I'm Signing because The Oceana Dunes is a place where me and my family all come together and Have fun ride a dirt bikes and share stories next to a campfire at night. I'm sure this is the same for a lot of families. Please don't take that away."
Robert Gloisten	Oxnard, CA	2019-06-27	"Only place to ride sand"

Name	Location	Date	Comment
Jessica Rodriguez	US	2019-06-27	"I believe that the dunes should stay open and not be closed. I've enjoyed years of camping with family there. So many memories were made and more and can still be made."
Nick Martin	Scottsdale, AZ	2019-06-27	"This is one of the last, best, safest, designated areas in the southwest to ride and keep the machines off the streets, in the sand where they belong. Riders need safe areas where they can ride without regular pedestrian interference. This should be reserved for people who respect the sport!"
Andrew Slane	Bakersfield, US	2019-06-27	"Magnificent place to go spend time with family and friends on the beach"
Caleb Parks	Pasadena, MD	2019-06-27	"As an Active Duty serving member of the USA military stationed in California I would ask that the board discussing the possible closure of this instead look to find ways to make more profit utilizing it instead. It's one of the very few places I am aware of that men and women in service in the area like to go."
Tanner Duggan	Riverdale, CA	2019-06-27	"Have to keep the family tradition alive and keep it open for future generations."
Courtney McNeely	Santa Cruz, US	2019-06-27	"This place rocks for camping"
David Bledsoe	US	2019-06-27	"Shutting down Oceano Dunes would be catastrophic to local businesses!!! Generations have camped there!!"
Sarah Henson	Sonora, CA	2019-06-27	"I have raised my 4 kids going to oceano dunes . My kids father has gone for 40 years and his parents before we love and respect the beach hopefully it will be open for my grandkids .,"
Elsie Maciel	Tulare, CA	2019-06-27	"It's a nice place where families get together and kids enjoy the beach and riding there quads"
Matthew Olson	Canoga park, US	2019-06-27	"My favorite place in the world."
Jarrett Chaney	Clovis, CA	2019-06-27	" My family grew up In Pismo dunes. Me as a kid and my kids were able to ride and enjoy family. Meet new friends. And keep old friends. Cali doesn't have many places like Pismo."
Cesar Chavez	Santa María, US	2019-06-27	"Fun place to be at and relax"
Udean Jeff	Lemoore, CA	2019-06-27	"I have been going there since I was a little girl an now I love to take my kids there. Don't take it away."
Tyler Brooks	Ventura, US	2019-06-27	"We own the state not them!"
Sandra Aguiniga	Palmdale, US	2019-06-27	"My Sister and Family go every year. Ive been 1yr and it was an awesome experience."
Jose Leon	San Luis Obispo, CA	2019-06-27	"People want the dunes close to build more houses, take away from the people to make more money. What about the people that are employed by buggy rentals? That's their only income, people just like to have it their way and cry about dust in the air, global warming, gluten, and animal cruelty. They follow a heard and don't

Name	Location	Date	Comment
			think for themselves. Do your due diligence and think for yourself not because of what others say."
Deandra Laborin	Fresno, CA	2019-06-27	" I have made a lot of memories camping in Pismo and would love to continue it"
Morgan Northcote	Arroyo Grande, CA	2019-06-27	"Because I grew up going to the dunes and riding buggies and quads. It's great for family and clean fun. The only reason why people are getting hurt is because acres and acres are being taken away because of an asshole who decided he/she hates their life and doesn't want anyone else to enjoy what we have on the central coast by making up some damn bull shit reason of air pollution because of motor vehicles on the beach. Let me tell you something, whether you have motor vehicles riding having fun in the dunes or not you will still have dust pollution on the Mesa. Sand dunes are sand the ocean breeze blows the sand in different directions, hints to why the dunes are not the same everyday. The cities of Grover beach, arroyo Grande, and pismo beach will be negatively impacted heavily if the dunes shut down to motorists. No one wants to come camp on our beach to just camp. They come to ride their toys and have fun shut the dunes down and watch many businesses fail and more people who will have to move and"
Jessica Golling	Clovis, CA	2019-06-27	"Jessica Golling"
Eusebio Rios	Ontario, CA	2019-06-27	"I love spending time and riding with my family."
Harry Franco	Bakersfield, CA	2019-06-27	"I fought for our freedom"
Chad Rains	Oceano, US	2019-06-27	"Many peoples livelihoods depend on Oceano being a vacation destination from around the world. Besides the revenue it brings to all the local small and large businesses, it is also a treasured local ammentity to much of the local community. For me, Oceano dunes/beach and its recreational riding areas have been a large part of why i still reside on the central coast."
Ross Creech	Eureka, CA	2019-06-27	"I own a home only a few miles from the dunes. I love what the dunes represent for the community."
Cassandra Saucedo	San Jose, CA	2019-06-27	"WE LOVE THE DUNES MY FAMILY LOVE GOING OUT THERE E HAVE BEEN GO FOR OVER 25 YRS ITS GOOD FAMILY FUNPLEASE DOT TAKE THIS AWAY"
Ryan Allen	Marysville, CA	2019-06-27	"I love riding and you can't take that away"
Rebecca Dynge	La Pine, OR	2019-06-27	"I've had many wonderful and horrible memories there and I would love to make many more!!!! #comphill #pulverizedkidneys #fenceddriveline #manymomories"
Bryan Masalta	US	2019-06-27	"The Central Coast has been home to my 35 years of life. I've been going to Pismo dunes ever since I could remember. Shutting down the dunes, recreational fun. Would bring sadness and sorrow to everyone that enjoys the outdoors here on the Central Coast. It would not only devastate the local economy of the five cities, but the Joy's of going to Pismo Beach for fun would cease."

Name	Location	Date	Comment
Christopher Weldon	Bakersfield, CA	2019-06-27	"The dunes are dope��"
Zach Morgan	La Grange, CA	2019-06-27	"I love the dunes and you libs suck"
Joshua Miller	Nipomo, CA	2019-06-27	"Our "Dust problem" is not caused by OHVs, I want my kids to have the same childhood I did, growing up on the dunes. We can't afford to lose more local money, especially with losing oil and power plant jobs."
Charles Todd	Zachary, LA	2019-06-27	"The Oceans Dunes have always been a bucket list adventure for me. How can a guy Rest In Peace if he can't complete his bucket list?"
Efrain Enrique Rubio	American canyon, OR	2019-06-27	"Why not"
tatum schaffer	Modesto, US	2019-06-27	"i go there every year with my grandma and dad. do NOT close this place."
Karen Schlecht	Nipomo, CA	2019-06-27	"I want to keep the dunes open and the the CCC is over stepping with their "powers" again! We need to keep the beach open to OHV for years to come. Aside from the economic impact, there will be many other losses including jobs of a lot of people and personal friends!"
Tony Tamburino	Clovis, CA	2019-06-27	"It's a fun place"
Dustin Bennett	Visalia, CA	2019-06-27	"The dunes have been a huge part of mine and my family's life. I lived in arroyo grande and SLO and know first hand what closing this would do to local businesses and the tourism that depends on the riding."
Janice Selby	San Francisco, US	2019-06-27	"Been going there since I was young. So many wonderful memories! This would be so sad if it closes down!"
robert raymond	santa maria, CA	2019-06-27	"I want the dunes to stay open for all to enjoy."
Austin Perez	Fresno, CA	2019-06-27	"It's a staple and shouldn't be closed down"
chris childs	Augusta, GA	2019-06-27	"Keep open"
Daniel Denner	Modesto, CA	2019-06-27	"Many memories there and want to make more!!"
Ronda Knight	Hughson, CA	2019-06-27	"Preserving"
Jared Jabouri	US	2019-06-27	"It is important that we reinforce the values that the offroad community represents. Conservation, stewardship, preservation, a genuine love and respect for nature."
Annie Dutra	Hanford, CA	2019-06-27	"I grew up on those dunes. My kids have also grown up out there."
Desiree Kiilau	Lihue, HI	2019-06-27	"This is a place i been going to since i was a little girl over 30 years"
Dezeay Herrera	Oceano, CA	2019-06-27	"My kids & I love to have bonfires at the Dunes!"

Name	Location	Date	Comment
Barry Miller	US	2019-06-27	"Barry Miller"
Kaeleigh Poindexter	Bakersfield, US	2019-06-27	"My family and my love for Pismo Beach"
Anthony Lamas	Bakersfield, CA	2019-06-27	"Cause i want"
Vincent Uribe	Pacoima, US	2019-06-27	"Being going for years"
Nicole Galindo	Oakland, CA	2019-06-27	"I love to camp at oceano dunes and ride there."
Charles Torstvet	Anaheim, US	2019-06-27	"I believe the right to enjoy these area's"
Jason O'Neal	La Verne, CA	2019-06-27	"Too many times the rich get their way. Those that live in the area want our rights taken away. The study based on dust was completed during one of the driest/ drought years on record. How do they think dunes form? Wind and dry conditions? The rich my rule because they contribute to politicians. Hopefully not to the coastal commission."
Matt Fuentes	Union City, CA	2019-06-27	"This resource and recreation area needs to be here some many depend on this to be open for they're livelihood"
sarah brewer	Casmalia, CA	2019-06-27	"I live on the Central Coast and use this beach often"
Drea Lee	Stockton, CA	2019-06-27	"Oceano dunes is home"
Evangelina Gutierrez	Grand Rapids, US	2019-06-27	"I have a lot of great memories to be continued!!!"
Bob Hennick	Bakersfield, CA	2019-06-27	"Because the government will do anything to take our fun away and local business depend on the dunes"
Christy Hedstrom	Madera, CA	2019-06-27	"If Oceano Dunes were to close, then that would be taking opportunities away from our special needs family."
Erik rheinisch	San Luis Obispo, CA	2019-06-27	"Save the beach for ohv!"
Robert Williams	Madera, CA	2019-06-27	"I am signing because the state has all the other beaches this one is an OHV beach and must stay that way."
Sherman Eastton	Arroyo Grande, US	2019-06-27	"I live here and my family and I love going to the dunes and enjoying the freedom of driving and riding the dunes. I witness new people from all over the world that have never seen or been to anything like this so to close it would be a shame. Please keep this unique and enjoyable experience open for my grandchildren to enjoy."
Cheyenne Kachalkin	Manteca, CA	2019-06-27	"I'm signing because my family loves the dunes. It's the only place I feel safe and comfortable riding it. It's worth the 4 hour drive every time."
James Motley	SANTA MARIA, CA	2019-06-27	"Freedom"
Shelly Rae Caris	Pioneer, CA	2019-06-27	"This is rediculous Is this not public? Then how can this be closed"

Name	Location	Date	Comment
Tim Burton	San Diego, CA	2019-06-27	"I grew up with this as my happy place. I love coming back home to go there. Please don't close this place down"
Vickie Rocha	Hanford, CA	2019-06-27	"Because alot of people and businesses will be hurting from this decision. Its been there forever. So why now."
Kyle Apple	US	2019-06-27	"Kyle apple"
Margaret Donaldson	Arroyo Grande, CA	2019-06-27	"These changes are ridiculous. I've lived here all my life and get real the wind blows and sand flies."
Meredith Pimentel	Turlock, CA	2019-06-27	"My family and I have been going to Oceano Dunes for at least 20 years. We all look forward to and love our trips there. We have a lot of great memories and would like to continue to go there for years to come."
Luis Ramirez	Fontana, CA	2019-06-27	"I've enjoyed going to Océano Dunes and I want my kids and their kids to be able to enjoy this majestic place responsibly for years to com."
Chad Lewis	Lompoc, CA	2019-06-27	"Because it is fun. It is safe. And it is just sand. I think it should stay the way it is."
Russel Brenan	Yorba Linda, CA	2019-06-27	"Recreational opportunities for families to enjoy together should be protected. Let's encourage kids to get outdoors. Keep the dunes open for responsible OHV use."
Jon Kilbourne	Wildomar, CA	2019-06-27	"We r losing to many ohv parks"
Sonia Rios	Oceano, CA	2019-06-27	"My family and I go out to the dunes all the time it's relaxing and fun for our family!"
Charles Moock	Vista, CA	2019-06-27	"Because I feel this will be the end of the small business owners of pismo beach."
Manuel Garcia	Bakersfield, CA	2019-06-27	"We just went last week they can't do this"
Tracy Hughes	Newark, CA	2019-06-27	"Because we don't have many places to ride. Stop taking away our good clean fun!"
Tracy Weddle	Napa, CA	2019-06-27	"We the people should not loss our right to camp and use the Oceano OHV Park."
Marissa Martinez	Salinas, CA	2019-06-27	"I love this place! One of the fun and best places my family and I enjoy go to. It would be such a shame if this place was to close their doors for good! ##"
Mario Persicone	Fresno, CA	2019-06-27	"The beach belongs to all of us"
Jennifer Belardes	San Jose, CA	2019-06-27	"I have vacationed there since I was a teenager"
Rick Gomm	US	2019-06-27	"Oceano Dunes has been a great place for my family to make unforgettable memories. There is no other place in california to use our ohv's on the beach . Hundreds of thousands of people visit the dunes each year paying to camp. Is that revenue/economic impact

Name	Location	Date	Comment
			not important to the local economy/business's? The loss of the ohv area would be much greater than you think!"
Jeremy Crisman	Anaheim, CA	2019-06-27	"Lots of childhood memories and it's the only place left"
Karen Gaither	Porterville, CA	2019-06-27	"This needs to stay OPEN!!!!"
Kevin Valdez	Everett, WA	2019-06-27	"Those trying to ban OHV use are stupid. OHV users are not to blame whatsoever for wind blowing sand. How do you think the sand dunes were formed in the first place?"
Alex harris	bakersfield, CA	2019-06-27	"Brap"
Dylan Enox	Bakersfield, CA	2019-06-27	"My family grew up riding and having fun out in the dunes. Don't ruin a family's memories and future memories with my future kids -Dylan Enox"
Melissa Furash	Phoenix, AZ	2019-06-27	"I believe in the petition"
Miguel Santuario	San Francisco, CA	2019-06-27	"It's important"
Cathy Murphy	Bakersfield, CA	2019-06-27	"I grew up on the coast and my parents worked in Pismo Beach. We spent a lot of time in Oceano as my dad took us to the dunes to ride. Best times as a family. There has always been wind at the beach and caused dust. The people bought there homes knowing this and it doesn't justify closing it down. I'm am very much against this closure."
Erin Kelsey	Solvang, CA	2019-06-27	"I believe we need open spaces to enjoy and show our children activities that can allow them to stay out of trouble"
Breana Stachura	Nipomo, CA	2019-06-27	"To protect our local economy"
Billy Simms	Visalia, CA	2019-06-27	"I want to keeep the dunes!!"
Justin hart	Visalia, CA	2019-06-27	"Oceani dunes is something that I hold dear to my self , and many other people from California , it's something that makes the state amazing , and I'd like to be able to share the fun I've had with my family as the years go on"
Andrew Brooks	Fresno, CA	2019-06-27	"I grew up in the dunes and want to continue the family tradition."
Dina White	Fresno, CA	2019-06-27	"I'm signing this petition in support of keeping the Oceano dunes SVRA open. The dunes hold a very special place in our hearts because it's are much deserved family time. Please don't close it. Mother Nature is the cause of the dust particulates NOT THE DUNE RIDERS."
Courtney Converse	Modesto, CA	2019-06-27	"I'm signing because this have been a great family outing for my family and don't want it to go away"
Jared Zurilgen	Crows Landing, CA	2019-06-27	"I want to protect our ability to ride on the dunes."

Name	Location	Date	Comment
Brian Rupert	Carlsbad, CA	2019-06-27	"We do many family trips to the dunes. We're going to miss riding by the Ocean. So many family memories! The local economy is going to miss all of our money! California is ruled by morons."
michaelyn pryor	Bakersfield, CA	2019-06-27	"Michaelyn Pryor"
Dan Motgan	Bishop, CA	2019-06-27	"Government overreach at its finest."
Clifton Blythe	Orcutt, CA	2019-06-27	"I am a local and have always gone there but was always respectful of the right to do so."
Chris Perkins	Fresno, CA	2019-06-27	"This place like full of family fun."
Jeff Madden	Arroyo Grande, CA	2019-06-27	"We will not be run off while the coastal commission lines their pockets with Trilogy money. This fight is about to get nasty."
Jim DuBois	Fresno, CA	2019-06-27	"We need to keep those beach is open for the people of California that want to use this are used them twice a year myself this is completely ridiculous and will destroy the lives of Fort Collins and all the people in it close"
Steve Hofbauer	Palmdale, CA	2019-06-27	"Provide reasonable enforcement and reasonable access limits.  Mitigate don't close!"
DANIELLE SWAYZE	Henderson, NV	2019-06-27	"Big mistake the city itself will suffer! Restaurants, bars, shopping, etc. think of the MILLIONS of people who visit Pismo for the uniqueness of the OHV lifestyle, from all over the world! Think of the thousands of individuals who will lose their jobs and homes just reading the fact that they are entertaining this thought makes me sick to my stomach!"
Michael McIntyre	Renton, US	2019-06-27	"I love camping there 2 times a year."
Tammy Wininger	Clovis, CA	2019-06-27	"I spent many days there with my family and would hate to see it go without my grandkids enjoying it also"
Michelle Moore	Dallas, US	2019-06-27	"So many people enjoy family time at the dunes. Don't take that right away."
Dawn Soares	King City, CA	2019-06-27	"I appreciate recreational areas and the great times families have in these areas."
Donnie Hicks	Fort Wainwright, US	2019-06-27	"Why not"
Kim saxton	Tulare, CA	2019-06-27	"We love to camp there with our family"
jeff knowlton	Santa Maria, CA	2019-06-27	"If you close the dune 1 the store's in the area will struggle "bankrupt" 2 no tax revenue, streets get worse then they already are. 3 once again you are taking away a family bonding place where family's and friends have been making memories for the last 75 years +."
Beth Davis	Mount Pleasant, SC	2019-06-27	"Tyler Bailey deserves this!!"

Name	Location	Date	Comment
pamela helmuth	San Dimas, CA	2019-06-27	"What an incredible place to visit"
Christopher Pulliam	Lancaster, CA	2019-06-27	"I want to keep the dunes an OHV/Jetski friendly area!"
Katherine Gardner	Arroyo grande, US	2019-06-27	"This is the second home and a great place to have beach camping and fires. Let's keep it open and make more great memories."
Scott Wonnell	US	2019-06-27	"I completely disagree with the commission on this. I lived on the Mesa for 10 years. It is not the OHV area causing the issues. Looks at the refinery or the 100 year old eucalyptus groves."
Sean Brumley	Turlock, CA	2019-06-27	"This is a place we go to spend time with friends and family. To ride and enjoy company and meet new people who ride."
Haley Handy	Bakersfield, CA	2019-06-27	"We should also open more of the beach like it was years ago!!!"
Michael Sanchez	Montebello, CA	2019-06-27	"Its been a long tradition going to Pismo and off roading there. Been doing it sinve I was a kod in the early 80s. It would be a travesty to take that experience away from future generations."
Ryan Wilson	Clovis, CA	2019-06-27	"It would be ridiculous to close the beach to ohv."
Sidney Steffen	US	2019-06-27	"Trying to shut everything down like they did the majority of ocotillo wells"
Margarita Jimenez	Manteca, CA	2019-06-27	"This is a place our family has made great memories qt and hope to continue to"
jason brown	Long Beach, CA	2019-06-27	"The idea of this place going away, is as sad ridiculous as if surfing suddenly became illegal. Just for the financial loss to the areas businesses even. Well, gotta go soon now!"
Derrick Elswick	Lompoc, CA	2019-06-27	"Screw libtards"
Chris geary	San Jose, CA	2019-06-27	"I enjoy the dunes with my family!"
Brent renshaw	Bakersfield, CA	2019-06-27	"My family and me frequent the dunes often and have grown up spending our weekends going there. It's devastating to think that such an awesome place could soon be lost to our kids and future generations."
natalie vidmar	Clovis, CA	2019-06-27	"Natalie Vidmar"
james hixon	arroyo grande, CA	2019-06-27	"This is just a left wing pipe dream and this does not create any problems."
Chris Radoccia	US	2019-06-27	"I grew up riding at Pismo, love it. Great family memories and looking forward to making .ore with my kids."
Carolyne Brodie	US	2019-06-27	"The dunes are a place that has great memories!"
David Pittman	US	2019-06-27	"Have been enjoying the dunes my whole life and my children would like to also !!! Its one of the last great places in California to enjoy ohv activitys !!!!!!"

Name	Location	Date	Comment
Andrew Dill	Bakersfield, CA	2019-06-27	"My family has camped and made great memories here for over 30 years."
Joseph Williams	Santa margarita, CA	2019-06-27	"Favorite weekend activity and to save the town"
Aaron Rice	US	2019-06-27	"Aaron rice"
Kayla Peavey	Hughson, CA	2019-06-27	"Been going to pismo since I was a little girl! Lots of family memories, my kids love it just like I did growing up! Let's keep the dunes open!!!"
Zachary James	La Habra, CA	2019-06-27	"Pismo has been around for generations and brings more money to the central coast than any other recreational spot"
Vincent-Marco Duchetta	Arcadia, CA	2019-06-27	"Braaaaap"
Giles Hampton	US	2019-06-27	"Me n my homies dirty Mike n the boys be rideing on Dem dunes ol'son"
Moe Montoya	West Jordan, UT	2019-06-27	"I enjoyed camping here"
Shane Wise	Fresno, CA	2019-06-27	"Its bullshit!!"
Roger Prater	Chatsworth, CA	2019-06-27	"Friends and family enjoy the park regularly"
John medlen	Fort Bragg, US	2019-06-27	"It's ours to use!"
Joey Urena	Visalia, US	2019-06-27	"Being going to the dunes since I was a kid and hoping to carry same tradition with my kids"
Janet Harshbarger	Nipomo, CA	2019-06-27	"Lived her all my life, our family has always enjoyed the Dunes. It should be open to everyone. People who are willing to close dunes due to recent deaths probably shouldn't drive their cars. Many more people die in traffic accidents then all the deaths on the beach. As far as the air quality, the sand will always blow. Trilogy cut down all those trees which acted as a natural barrier. These same people are complaining about the air quality. I have a word for all the unhappy people, MOVE."
Matt Tramel	La Habra, US	2019-06-27	"Matt tramel"
Jeff Ferrin	Paso Robles, CA	2019-06-27	"I signed this to fight against the closure of the dunes"
Justin Gall	Morgan Hill, CA	2019-06-27	"Pismo is for the Jeepers!!"
Brandon Staheli	Salt lake, UT	2019-06-27	"Because the dunes bring in so much revenue to the locals and they should be kept the way things are they are there for a reason and that's to be ridin on and shredding the dunes"
Jessie Gonzalez	Turlock, CA	2019-06-27	"KEEP THE DUNES OPEN !"

Name	Location	Date	Comment
Nichole Ortiz	Bakersfield, CA	2019-06-27	"This is a great family place, there are other ways to control riding with out closure"
Sherry Perry	Atascadero, CA	2019-06-27	"I've been going to the dunes since 1980 and I would hate to see this family tradition that so many people have go away. This has been available for so many more years than most of the protesters have even lived in this area. I am also a local Atascadero resident"
Steve Lockwood	Mariposa, US	2019-06-27	"Cuz the man is at it agin fight for your rights"
Patrick Collins	Manteca, CA	2019-06-27	" I've been riding Pizmo my entire life love going there with the family."
Vonda Patchin	Sorento, IL	2019-06-27	"Because it needs to be signed"
Melanie Dienhart	Paso Robles, CA	2019-06-27	"Keep the dunes open. Its a small area out of hundreds of acres of beach. Its a great money maker for the area. Let them have this area. If people who live near by doesn't like it, they shouldn't have moved there."
Lonnie Roswell	Elk Grove, CA	2019-06-27	"I used to enjoy it!"
Jackie Ambler	Sonora, CA	2019-06-27	"Just kerp it open!"
Marilyn Ledford	Escalon, CA	2019-06-27	"Family vacation since childhood"
Taesha Tocco	US	2019-06-27	"Taesha Tocco"
Jasmine Ortiz	Tracy, US	2019-06-27	"We camp at Oceano Dunes 2 to 3 times a year. It's a trip we all look forward to each time. I'm very saddened by the potential closure of the park. I know my kids will also be devastated with the news. Oceano Dunes is our special place where we go to be one with nature. We LOVE our time there and we want to keep making memories. Please leave it open for ALL to enjoy."
Bailey Hernandez	Fresno, CA	2019-06-27	"I'm signing this petition because this beach gives us a place to go for a vacation. Been going for years."
Greg Wood	Du Bois, US	2019-06-27	"My friends enjoy it and I eventually wanna make the trip"
Brittini Bente	Fresno, CA	2019-06-27	"We do this with all of our family and friends! My kids love it."
Francisco Ramirez	Santa Maria, CA	2019-06-27	"I enjoy the dunes as isfull access unrestricted."
Hadley Melton	Van Nuys, US	2019-06-27	"I feel that this OHV park has a huge impact on the local economy of the surrounding areas and with the loss of this OHV park would devastate a large number of families both on the financial aspect and just basic family traditions. People have had these family traditions of camping and riding at the beach for generations."
Patricia Bryson	catheys Valley, CA	2019-06-27	"closing this park will not only prevent the public from enjoying this beautiful place, but will be a huge economic hit for the towns relying on the year round campers."

Name	Location	Date	Comment
VeroNick Martinez	US	2019-06-27	"Place we're we go as a family"
Bryce Cooper	Bakersfield, CA	2019-06-27	"The dunes should be open for OHV's and camping! There's been way too many places closed for us to be able to enjoy!"
Tabitha Johanson	Antelope, CA	2019-06-27	"I love camping here with my family."
Nick Bradford	Exeter, CA	2019-06-27	"Enough is enough these environmentalist have stepped out of their bounds"
Tyler Bryant	Sparks,nv, US	2019-06-27	"Because I ride and would like to go here one day!"
Ryan Burmaster	San Luis Obispo, CA	2019-06-27	"This has been an historical sight for off-roaders, as well as a natural Sandy dune. Before the eucalyptus trees were planted, the entire nipomo and santa Maria valley was covered in sand dust. Let's not confuse facts. The sand will always blow there. If someone doesn't like it, they move to an adjacent town."
Raymond Lewis II	Hanford, US	2019-06-27	"Don't let them take away such an amazing place to play and ride and camp!!! So many great memories and times I have spent there!!!!"
Chelsea Van Bastelaar	MOORPARK, CA	2019-06-27	"I love oceano dunes! Our family has been camping and riding there for years! Dont shut it down!"
Diego Trujillo	Los Angeles, CA	2019-06-27	"Because FREEDOM!!!!!"
Susan Reed	Bakersfield, US	2019-06-27	"I love the dunes"
Karen Willenberg	Sonora, CA	2019-06-27	"It's the right thing to do."
Bradley Enscoe	Riverside, US	2019-06-27	"To many good memories and want to continue camping and riding with my family."
Lesle Burchell	Visalia, CA	2019-06-27	"The dunes have been such a huge part of all of our lives living in California! Generations have all shared in the enjoyment of these dunes! Please don't take that away from us!"
Ethan Bare	US	2019-06-27	"It's a great place to have fun. I've gone here since I was a kid."
Julie Sessions	US	2019-06-27	n n
Deyanira Avila	Fresno, US	2019-06-27	"We love the Dunes"
Jay LaVigne	Chino valley, AZ	2019-06-27	"This place has been great to many and lots of memories and good times have been made here so why get rid of it?"
Brian Prichard	Oakdale, US	2019-06-27	"This is America that's why!"
Robert Galindo	US	2019-06-27	"The dunes belong to the people!!"
Lateasha Ritchie	Twin falls, US	2019-06-27	"I grew up camping on the beach and so have my children. I hope that one day I will get to with my future grandchildren. The dunes as they are now, with full accessibility it play and spend quality

Name	Location	Date	Comment
			family time are a treasure. And should remain as they are for other generations to enjoy."
Jamal WHITTINGTON	Los Angeles, CA	2019-06-27	"I want Oceana Dunes to remain an OHV."
Barbee Castillo	US	2019-06-27	"My family grew up riding on these dunes! Countless memories that I can't wait to share with my kids when they start to ride!!"
Debbie Silva	Tipton, CA	2019-06-27	"Debbie Silva"
Jana Keeley	Auberry, CA	2019-06-27	"This area belongs to us!!! A place many of us call home and travel far to enjoy. Please reconsider this and quit catering to crybabies!"
Daryn Ventura	Arroyo Grande, CA	2019-06-27	"I want keep oceano dunes open full time year round with no restrictions"
Karina Plancarte	Santa Maria, CA	2019-06-27	"Karina plancarte"
Michelle Martinez	Visalia, US	2019-06-27	"The Oceano Dunes have been my home away from home with friends and family for many years! Many fond memories. There is a sense of peace when you wake in the morning to waves crashing, the smell of overnight fires going out, and OHVs idling. I want to be able to take my future kids to enjoy the beach how I have been able to and not just tell them stories of the experiences. Oceano Dunes is not only a place to enjoy family and friends company, but also meet new people. The ones that are fighting for the right to keep the Dunes open are also the ones that respect he habitat and beauty it has! #freethedunes"
Angel Ronquillo	Long Beach, CA	2019-06-27	"I'm signing because I ride to"
Malichane Sayarath	Porterville, CA	2019-06-27	"That's the place my family enjoys! And that's where my friend that I lost a couple years back loved to go so we go to keep his memory alive!"
Christine Hawley	Oceano, CA	2019-06-27	"Christine Hawley"
Thanouthong Phaypaseuth	Fort Smith, AR	2019-06-27	"Thanouthong Phaypaseuth"
Erik Howard	Highland Lakes, NJ	2019-06-27	"Got you brotha"
Lyle Weber	Simi Valley, CA	2019-06-27	"It's a great place to spend summer with the family!"
Kris Criddle	Rigby, US	2019-06-27	"I like riding there"
Glenn Goodwin	santa maria, CA	2019-06-27	"Its the last stretch of beach you can drive on. Dont like it, go to a different beach."
Patricia Rea	Stratford, CA	2019-06-27	"This place is a home to all of us please don't do this"
Juston Garrison	Arroyo grande, US	2019-06-27	"Only reason why i live here"
Jennelle Ashworth	yakima, US	2019-06-27	"I'm signing this because my family and I were born in California and were able to enjoy this luxury often. Now we live in Washington

Name	Location	Date	Comment
			and we travel all that way to visit this amazing place. We luv to ride and have the ocean as ur front porch while doing so. There are scum bags though that dont clean up after themselves that ruin it for everyone. we are definitely the people cleaning up the mess behind. Please help save this opportunity for my kids to continue our tradition."
Chris Arnold	Glendale, AZ	2019-06-27	"So tired of all the land grabbing!"
Dakota Barlow	Fresno, CA	2019-06-27	"Dakota C. Barlow"
Joseph Villarreal	California	2019-06-27	"Joseph Benjamin VILLARREAL"
Ashley Morales	Arvin, US	2019-06-27	"It is where memories are made with the people we love . It is tradition and now my kids are enjoying the place . Why take something down that brings so much joy to families ."
Eriberto Zamora	Winnemucca, NV	2019-06-27	"Eriberto zamora"
Daniel Rumfola	La Mirada, CA	2019-06-27	"800 miles of coastline in CA and only 5 miles where you can ride OHV. I want my grandchildren to be able to enjoy this like my kids are able to. The thought of taking this away from the public is nonsense. And why because people that knew where they were moving are complaining about dust? This is like people moving next to an airport and demanding it get shut down. If they don't like it they have 798 more miles of beach front property to choose from"
Ebboni Haney	Beaumont, CA	2019-06-27	"I grew up going to the dunes. Keep it open!"
Jeramy Neal	Fresno, CA	2019-06-27	"Its fun"
Jinky Marrero	Navarre, US	2019-06-27	"Keep it open for us to visit and have fun it's a tourist destination you know"
Erin McNabb	Gilroy, CA	2019-06-27	"Best place for a family vacation"
Stacey Campos-Jenkins	Carson, US	2019-06-27	"We need recreational area for our families to enjoy."
Josh Stiers	Hollister, US	2019-06-27	"My family has been going to pismo since before I was born. And we still do our family thanksgiving in the dunes every year. It is tradition. And a great place that makes great income for the community"
Lucynda Lopez	Coalinga, CA	2019-06-27	"I have very fond memories of my dad taking us to the dunes to go camping and off roading in his jeep."
Stephan Cheek	Sacramento, CA	2019-06-27	"I grew up in Atascadero and there is a lot of benefits to keeping Pismo Dunes open to off highway users. We pay taxes and spend money in Pismo (restaurants, hotels, etc.)"
Angelina Dratwa	Arroyo Grande, CA	2019-06-27	"I grew up here, it's where we take our kids out for fun!"
Cody Parker	San Francisco, CA	2019-06-27	"I love riding the dunes and want to keep them open"

Name	Location	Date	Comment
Pat Mancha	Highland, CA	2019-06-27	"We love camping on the sand next to the water, riding our quads and surf fish all in one day without leaving our campsite"
Kandis Taylor	Sonora, CA	2019-06-27	"It's a fun place to spend time with family"
James Coots	Bakersfield, CA	2019-06-27	"This is my home away from home"
Josh Jones	Seattle, US	2019-06-27	"We need to keep this land and so many others are open to our off-road enthusiasts and those who respect it"
Diane Ripley	Long Beach, CA	2019-06-27	"Hello,Who are you using to help you communicate with Coastal staff?"
Alyssa Mcclellan	Exeter, US	2019-06-27	"Family has vacationed here for years"
David Peterson	Bakersfield, CA	2019-06-27	"Keep it open for responsible people"
Leeann Collins	Fresno, CA	2019-06-27	"You shouldn't shut this down."
Fernando Rodriguez	US	2019-06-27	"I have never been and it would be awesome to be able to take my kids for the first time. I hear it's a great experience and wonderful time."
Chuck Yeadon	Coalinga, CA	2019-06-27	"I enjoy riding my quad out on the dunes!"
Troy Showalter	San Luis Obispo, CA	2019-06-27	"This is my home I live 5 minutes away. Can't believe they are actually trying to take this away"
Avelena Labrie	Fresno, CA	2019-06-27	"The dunes have been apart of my life and my families for years riding and just enjoying the beach. Meeting new people and an unexpected visit from the guys from Boondocker one evening, which turned into a really fun weekend. They make turbo kits for Razors. Don't take away our dunes. The jobs that will be lost and the financial impact for not just Oceano but you need to include Pismo Beach and Grover Beach as well as other surrounding cities!"
Anthony Pires	Turlock, CA	2019-06-27	"Anthony Pires"
Christopher Epperley	Fresno, CA	2019-06-27	"This is a park for the people! Stop trying to shut down everything."
Allison Tepper	Simi Valley, CA	2019-06-27	"I think it should be protected"
danny castro	fresno, CA	2019-06-27	"Danny Castro"
Tristan Koepfli	murrieta, CA	2019-06-27	"we pay to keep these areas open and to close the only 5 miles of beach that is left open is dumb."
Jason Brotherton	US	2019-06-27	"We as citizens of the United states have a right to public land and how we choose it."
Juliana Melendez	Van Nuys, CA	2019-06-27	"Save the dunes"

Name	Location	Date	Comment
Richard Fransik	Murrieta, CA	2019-06-27	"I'm signing because have taken my boys there every year since they were born. This place is my Zen. So many great memories there.  They cannot shut it down."
Andrea Garcia	Sacramento, CA	2019-06-27	"It has been a family tradition for many years to travel here."
Grant Duinkerken	Riverdale, CA	2019-06-27	"To keep the dunes open!!"
Brian Pevehouse	Anaheim, CA	2019-06-27	"3,427 miles of California coastline but apparently 5 of those being open for motorized recreation is still too much."
Gabriel Lozano	Ukiah, CA	2019-06-27	"I use this recreational area"
Justin Campbell	Bishop, CA	2019-06-27	"Off roading is an integral part of many families bonding and a huge tradition in their lives."
Tanner Thomas	Lake Havasu, AZ	2019-06-27	"I have been coming here as a professional athlete for over 15 years and as my livelihood I strongly urge our decision makers to rethink their outlook on taking this away from positive recreation."
Clara Stinson	Kansas City, MO	2019-06-27	"Closing these areas is not the best choice of action for US citizens or Californians!!"
Anthony Cool	Oceano, US	2019-06-27	"Keep the Dunes open!!!"
Jessica Castellanos	Nipomo, US	2019-06-27	"Keep the DUNES open. It helps with local businesses and helps our community in many ways"
Renee Vertrees-Reynoso	Santa Maria, CA	2019-06-27	"Look at history, Guadalupe became a ghost town when they shut the beach access down and has never been the same. This would put a lot of hard working people out of business. This is one of the last affordable, outdoor activities for the locals and nearby residents to enjoy."
Billy Robasciotti	Verdi, NV	2019-06-27	"Billy Robasciotti"
Julie Serrano	Stockton, CA	2019-06-27	"For a coworkers"
Juan Medina	Oakland, US	2019-06-27	"Oceano Dunes Have it open"
Riki Andrews	US	2019-06-27	"I love them"
DeDe Bettencourt Muhlbeier	Lodi, CA	2019-06-27	"I support my niece"
Naomi Rodriguez	Madera, CA	2019-06-27	"I'm signing because the Oceano Dunes have been a family vacation destination for decades and we do not want to see the dunes close down. We have the right to responsibily enjoy our great states treasures."
Justin Tomlinson	Martinez, US	2019-06-27	"There are not many places left on the central coast where people can go and have fun. Closing the dunes would cause even more teens and young people to occupy their time with other things. Other things like drugs, gangs, etc What does everyone think will happen if there is nothing for anyone to do? People will begin to

Name	Location	Date	Comment
			make their own things to do, which I'm sure the Central Coast area would have a much bigger problem with them the dunes. In addition, the dunes is a large revenue maker for the county/state. Every weekend people go out to the dunes, The ones who make bad decisions and get caught are cited by the Rangers and end up having to pay fines. The amount of Money collected on a busy weekend at the dunes can be quite a bit. Everyone should look at the big picture before deciding to close The dunes."
Jeremy Kincaid	US	2019-06-27	"To keep free space open. As it's one of the only beaches that you can drive on in California"
Christopher Bennett	Fresno, CA	2019-06-27	"It's tradition"
Anthony Cool	US	2019-06-27	"We need to keep the dunes open for family and friend to enjoy!"
Alba Miranda	Porterville, CA	2019-06-27	"I love the dunes! We do camping 5-6 times a year!"
Lenora Gomes	Denair, CA	2019-06-27	"I've been going to the dunes since I was 5 years old. It has been a spot we have vacationed for years as a family and with friends."
Chris Mcandrews	Portland, OR	2019-06-27	"I sell toy haulers."
Kristeenia Long	San Luis Obispo, US	2019-06-27	"Me and my husband love to go out here and see the beautiful scenery we like taking in the beautiful breeze walking in the sand we have so many memories there so many good memories"
robert faussett	glendale, CA	2019-06-27	"It's all about money"
Dillon Schmierer	Portland, OR	2019-06-27	"I enjoy riding in these areas. It would be a shame to close something that brings so much joy to many people and families"
Alan Draper	La Verne, US	2019-06-27	"I have been camping at Pismo for 50 years and I am looking forward to the Old School Dune Buggy Reunion in 2020!!!"
David Alvarez	Fresno, CA	2019-06-27	"Keep it open"
Eduardo Camacho	Turlock, US	2019-06-27	"Ec"
Kyle Robertson	San Luis Obispo, US	2019-06-27	"Riding and camping at the dunes is one of the many reasons we love living here. We have made so many great memories out there. It will never be the same town if the area is closed to OHV."
Misty Leonard	Gilroy, CA	2019-06-27	"I'm signing because I am a homeowner in Oceano and believe that this beach is where we raised our children, where families that play together stay together and we have no issues with dust from our home. Sand blows with wind. These people are not going to see any changes once the beach is closed. Our town will suffer from less tourism and our property values will in turn suffer! This is shameful that a handful of deep pockets don't care about their actions!"
Gage Gasior	Boise, ID	2019-06-27	"Dunes be dunes"
Evan Burdeno	Los Angeles, CA	2019-06-27	"Keep what little is left for us riders and campers to enjoy"

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Barbara Clevenger	Santa Maria, CA	2019-06-27	"It would be a shame if they close the dunes. It's a beautiful place that families have visited and enjoyed for years."
Brett Pickett	San Jose, US	2019-06-27	"Incredibly devastating to the local economy, less recreational riding and camping for families, worse for the environment families will have to drive further distances creating more pollution than what is happening right now, Camping and off-road riding is a great teacher to young people are being courteous and respectful to others in the environment that will shape their future life on how to treat others."
Lloyd Anders	Yucca Valley, CA	2019-06-27	"To many places getting shut down,And it's the last beach in Calif. That you can ride the beach, been riding there all my life."
Krista Bradley	Hughson, CA	2019-06-27	"Krista Bradley"
Kelsey Payne	Tulare, US	2019-06-27	"Because I have come here all my life and now have the chance to bring my son and make memories with him! If we can no longer come here and ride the dunes I will not be back! I don't want to just come to some fancy beach and walk around!"
Braydon Lee	Taft, US	2019-06-27	"That's a really fun place"
Tessa Jimerson	Mountain View, CA	2019-06-27	"I believe it should stay open and low cost"
Eric Wagner	Fresno, CA	2019-06-27	"My buddy Ray said it's a great cause. ��TRUMP 2020 ��"
Jonathan White	Tulare, CA	2019-06-27	"Because only place close to were i live from tulare ca an why should we yhe people be punished because of idiots an a bird make no since at all"
Araceli Torres	Delano, CA	2019-06-27	"We love the place"
John Ouch	Stockton, CA	2019-06-27	"Support free living"
Susan Brown	Santa Maria, CA	2019-06-27	"Myself and many supporters of keeping Oceano Dunes SVRA open; are reaching out to all our fellow riders, campers, friends, and family to try and gather as much support as possible to voice our opinions and objections on the closure of this park! This park belongs to the people of the state of California, and if we do not make our voices heard now, it will be too late! It's time we band together and fight for what is a California Coast staple. The closure of this park will not only effect local business but, also effect many people personally."
Julia Yang	Fresno, CA	2019-06-27	"I'm signing this because my family and I enjoy going to oceano dunes. Every occasion we have, we like to enjoy it at the dunes. Please reconsider on closing it. A lot of people will not go to pismo anymore if they close the dunes. This I know for a fact."
Sarah DeChenne	San Bernardino, CA	2019-06-27	"My wife grew up riding those Pismo dunes, and that has created so many lasting memories."
Jon Launer	Fresno, CA	2019-06-27	"I've been going to the dunes for a very long time with my family and friends and I would like for the recreational area to be open for

Name	Location	Date	Comment
			when my kids have children of their own to enjoy it much like we have"
Nolan Glock	Pomona, CA	2019-06-27	"This is the only spot on the whole California coast where you can ride. Restricting that would be restricting our freedoms."
John Ouch	Stockton, CA	2019-06-27	"Man ride hard or go home"
William Sitchler	Coachella, CA	2019-06-27	"It's our right"
Sandie Beavers	Bakersfield, CA	2019-06-27	"We have spent years enjoying the Dunes!"
Nakia Muller	Riverton, WY	2019-06-27	"Not ok with the closure. I was born and bread in CA. I may not live there now but I completely disagree."
Cyndy Lee	Porter Ranch, CA	2019-06-27	"I've been going there for over 30 yrs it's a tradition. I dont want them to close it down"
Kaylee Kern	US	2019-06-27	"I use to spend a lot of family time here with unforgettable memories. Closing the park would take that away from so many families"
Tony Serrato	Hesperia, CA	2019-06-27	"Still gotta try even tho CA will do whatever they want anyway"
Christopher Scott	US	2019-06-27	"I enjoy our public lands and want them to be open for my kids to enjoy."
Caleb Morton	Salt Lake City, US	2019-06-27	"Great place to ride"
Griselda Contreras	Ojai, CA	2019-06-27	"It's a place where people come together"
Karen Suty	San Jose, CA	2019-06-27	"The Oceano Dunes is a historical recreation area for California's families."
Nicholas Sanders	Porterville, US	2019-06-27	"Why would you close something that's been an impact on people's lives for years on end just doesn't make any sense"
ronald meyers	Los Angeles, CA	2019-06-27	"I like riding and camping there"
Traci Davey	Puyallup, WA	2019-06-27	"This is my hometown and have lots of memories riding on this beach. I would hate to lose it because some people who probably didn't grow up here or ride here don't understand."
Tarrin Cross	Camarillo, CA	2019-06-27	"It should remain open for recreational use"
Eric Borklund	US	2019-06-27	"I grew up going there!"
Christine Wristen	Modesto, CA	2019-06-27	"I truly support this cause!"
Ranell Cornejo	Arroyo Grande, CA	2019-06-27	"I want to see the legacy of families camping and riding on the dunes continue."
MICHAEL Rocha	San Jose, CA	2019-06-27	"Family tradition to go every year. Been going since I was a kid"

Name	Location	Date	Comment
Cristi Taijeron	Borrego Springs, CA	2019-06-27	"My family and I are are off-road enthusiast and have spent some time at Oceano Dunes. My son actually spoke his first full sentence on top of a dune there. "Jeep stuck, no go." Oceano Dunes offers a unique experience for families to enjoy nature and off-road adventure, and I believe it is important for this small section of California's vast coastline to remain open for such use."
Alec Rohr	Salinas, CA	2019-06-27	"I support OHV in California"
Craig Krstolic	San Jose, CA	2019-06-27	"I'm tired of this heavy handed California Government that feels it can do whatever it feels it wants to. We the People will not accept this much longer."
Tiffane McRoberts	Visalia, US	2019-06-27	"It's family tradition, great memories, and priceless##"
Brandon LaRosa	Boise, ID	2019-06-27	"Public lands belong to the public for a reason."
Elizabeth Navarro	Dos palos, CA	2019-06-27	"Elizabeth navarro"
Cole Devlin	Chico, US	2019-06-27	"I'm Signing because I love to ride"
Ben Kelchner	Hemet, CA	2019-06-27	"I have off road toys, and whenever i get my family and friends together and head out to camp and ride the OHV community is always like a family. We will always make memories. Closing this will take away that chance for many families and people to make those memories."
Todd Snider	Bakersfield, CA	2019-06-27	"Please do not alter the current usage of the Oceano Dunes OHV Park."
Sunshine Hollingsworth	Stockton, CA	2019-06-27	"I personally have never visited but I know numerous families who have been brought together by camping and riding in this beach. Closing this off will not only destroy family traditions, something that the current culture is lacking, it will also destroy the local economy, which is a huge issue for the State of California. Stick to Malibu."
Bruce sundberg	Nipomo, CA	2019-06-27	"The state park is good for Californians and the tourism is good for local businesses."
Fred Cummings II	US	2019-06-27	"I'm signing because its unfair"
Mike Parker	Los Angeles, CA	2019-06-27	"The off-road area at Oceano needs to remain open to off-road vehicles."
Travis Quinn	San Jose, CA	2019-06-27	"Travis Quinn"
Duane Mckean	Edwards, CA	2019-06-27	"This has been a riding area off highway riding for many years I rode at this riding are since I was a kid now I'm 60 years old."
Emily Catron	Bakersfield, CA	2019-06-27	"That's what the Dunes are for! Easily trailered dirtbikes and rails to make less impact but not less fun."
Jenny Bishop	Antioch, CA	2019-06-27	"I love camping on the beach! Love Pismo downtown. Great area."

Name	Location	Date	Comment
Michelle Valdivia	Morgan Hill, CA	2019-06-27	"Keep it open!!"
Eric Behncke	Bakersfield, CA	2019-06-27	"We need ohv areas."
Sabrina Salazar	Delano, CA	2019-06-27	"it's some of my families tradition to go every year"
Ashley Heusdens	San Ramon, CA	2019-06-27	"Born and raised riding these dunes. The only thing that has kept me in California is my job and vacationing here. We spend every wedding anniversary riding these dunes making friends. I don't want to imagine a life without it. Breaks my heart that this is even a subject. Yes people have died here but people also die from cancer, or get hit by a car while a jogging, or a simple car accident should we end all that too?!? NO! Don't take away the one place we have to ride nothing screams freedom like an Atv between your thighs."
Dakota Shutters	Ozark, MO	2019-06-27	"I am an off road enthusiast."
Steven Budnik	US	2019-06-27	"Imma g"
Nicholas Galpin	Reedley, CA	2019-06-27	"The dunes is part of my family's lifestyle"
Danielle Schmidli	Acampo, CA	2019-06-27	"The memories we make here with friends and family are like no other. We've been coming here for over ten years and I have always imagined bringing our kids here for many more years to come and eating Old West Cinnamon Rolls on the beach every morning of our stay!"
Sandra Rowe	San Jose, CA	2019-06-27	"My family and friends love OHV at Pismo, I want my daughter to have more memories here. We have friends that live here and need to support from the economy brought by riders of Pismo Dunes. Closing this down will have a deeper impact!"
Steve Allen	Fresno, CA	2019-06-27	"It need to stay open. We pay green sticker fees to ride there"
David Knight	Klamath falls, US	2019-06-27	"I support this petition! Keep the dunes open!!"
Chris Ostafin	Coeur d'Alene, ID	2019-06-27	"I love off roaming their and having bon fires. It is full of memories for myself and many friends and family members."
Tracy Gallaher	Menifee, CA	2019-06-27	"I love to enjoy this riding area!"
Sandy Cervantes	US	2019-06-27	"I use the OVH"
Billy Walker	Hanford, CA	2019-06-27	"My love for pismo and the dunes"
M L	Merced, CA	2019-06-27	"I grew up going Pismo.Camping trip with family"
Stacie Prickett	Clovis, CA	2019-06-27	"My family has been visiting Oceano Dunes SVRA for 4 generations. Riding and enjoying the park is a tradition for many, many families. It is ridiculous to take away the only vehicle accessible beach south of San Francisco. The square footage of beach area Oceano Dunes SVRA takes up is minuscule in relation to the total square footage of beach area in California. Just let the families and off road enthusiasts have this space to enjoy."

Name	Location	Date	Comment
rocco spalliero	Lancaster, CA	2019-06-27	"We need places like this"
Chris Waller	Turlock, CA	2019-06-27	"Keep it open"
Bryan O'Brien	Fresno, CA	2019-06-27	"I grew up going to the dunes. Future generations should too. California's going light on law enforcement is I believe to blame. Too many bad apples."
Keith Marsh	Los Angeles, CA	2019-06-27	"Because I want my children and grandchildren to be able to experience what I have experienced at Pismo beach. We have lost enough rights in California"
Dennis Key	Exeter, CA	2019-06-27	"Too many areas for outdoor recreation have been closed. Open more areas to foster clean, safe outdoor use for family activities@"
Jack Badossian	Los Angeles, CA	2019-06-27	"I grew up going to Pismo. My kids hopefully will get to enjoy it when they are older too. It's a great place to go to enjoy the outdoors and get away from the everyday hustle."
Ean Collins	Discovery Bay, CA	2019-06-27	"I grew up enjoying the dunes and I want my kids to enjoy the same"
Shannon Simpson	Pico Rivera, CA	2019-06-27	"Don't close the dunes"
Nicholas Trahan	Lemoore, CA	2019-06-27	"Public land rights belong to all of California's citizens and not just the few wealthy members of the CCC. #LegalizeOHV"
Michelle Whitten	San Luis Obispo, CA	2019-06-27	"It is a great place for fun family activities and would be a huge blow to our economy and lots of job loss if they shut it down!"
Brittany Romero	Porterville, CA	2019-06-27	"We enjoy family vacations here. This closure will cause a huge loss for the local businesses."
Sheri Potruch	Paso Robles, CA	2019-06-27	"Sheri Potruch"
Grant Hedblom	Washougal, WA	2019-06-27	"Pismo is the only ohv beach access in CA. It needs to remain ohv use."
Joe Quinn	Canyon Lake, CA	2019-06-27	"Please keep our riding open. There are lots of people that enjoy these areas as riding areas."
Julie De Manty	Kingsburg, CA	2019-06-27	"Many generations have been going to the dunes for years it's a part of history for alot of people."
Eric Solis	Lancaster, US	2019-06-27	"My daughter loves Pismo it's our sweet getaway in the warm summer months reopen ALL areas give the people back 100% access"
Angel Martinez	Ontario, CA	2019-06-27	"We need to keep Pismo for future generations. So they may enjoy a offroad adventure in Pismo ."
Joe Tarango	Visalia, CA	2019-06-27	"I love the dunes and I love riding"
Alex Mueller	Canoga Park, US	2019-06-27	"I grew up there!"

Name	Location	Date	Comment
Brittany Emerson	US	2019-06-27	"It's a great place for friends and family to get together and keep tradition! Don't get rid of it please!!"
Corrina Baiza	Visalia, CA	2019-06-27	"Corrina Baiza"
Dakota Vieira	Cantua Creek, CA	2019-06-27	"Because i ride and camp and most importantly surf fish oceano dunes !!!!"
Rafael Villafan	Madera, US	2019-06-27	"1 week getaway every year out on the dunes!!"
Brent Wood	Buckeye, AZ	2019-06-27	"For a friend"
Barbara Navarro-Adams	US	2019-06-27	"Barbara Navarro-Adams"
Hank Dever	Sacramento, US	2019-06-27	"I've only been there a couple times but I enjoyed every time I went."
Ellie Cardoso	US	2019-06-27	"Ellie Cardoso"
Johana Garcia	Modesto, CA	2019-06-27	"I my self and family come out here often and i sign today to keep open"
James L'Heureux	Temecula, CA	2019-06-27	"Lets keep America free and accessible to its citizens."
Osvaldo Larios	Atwater, US	2019-06-27	"This Is a tradition we had every year with fam and friends camp and most importantly surf fish oceano dunes !!"
robert menchaca	fresno, CA	2019-06-27	"The Jeep life"
Angel Mora	Lemoore, US	2019-06-27	"Been attending Oceano dunes since I can remember, keep it open!! Great place for friends and family."
tina gould	fresno, CA	2019-06-27	"Tina Gould"
David Geiger	Madera, CA	2019-06-27	"It's how some families come together and keep tradition alive of enjoying riding and driving in the dunes!"
William Hughes	Stockton, CA	2019-06-27	"William S. Hughes"
Crystal Tsukerman	Anyioch, CA	2019-06-27	"�"
Gary Walker	Coalinga, CA	2019-06-27	"This place gives family's a place to ride & campout so it needs to stay open"
Matthew Sisk	Santa Maria, US	2019-06-27	"This is my happy place, bon fires, friends and family."
Damien Jelen	Dos Palos, CA	2019-06-27	"I'm signing because this place is like a second home. Many vacations have been spent here. It's a great stress relief and if it closes I won't be back to Pismo again."
Marcos Tejada	Carmichael, US	2019-06-27	"For our kids future so they can enjoy riding on the Dunes and camp on the ocean"

Name	Location	Date	Comment
Jesse Rice	San Jose, CA	2019-06-27	"There is no better place to go to for a family vacation. Save the dunes."
Amalia Lomeli	Los Angeles, CA	2019-06-27	"I have been taking my children since they were kids and have made many memories. I was hoping as time went by I would also get to take my grandkids and enjoy family bonding."
Jessica Durkee	Oxnard, CA	2019-06-27	"Shutting down the beach is going to kill all the small businesses that count on the tourism. Huge mistake!!!"
Emily DeLaquil	Anaheim, US	2019-06-27	"I love to ride!"
john mccormack	Simi Valley, CA	2019-06-27	"samantha is counting on me"
Valerie Reyes	Galt, CA	2019-06-27	"Pismo is a family place"
justin garlow	Canyon Country, CA	2019-06-27	"It's wrong to tamper with the few places we have left to ride. Without these places we ride in the streets and that's not good for any of us. I might just make a street jump in my neighborhood or somewhere else. Leave our lands alone."
Mike Redstone Jr.	US	2019-06-27	"Mike Redstone jr"
Lala Mulligan	Nipomo, CA	2019-06-27	"The dunes mean alot to our community as far as tourist and money Also us locals lool forward to the off season so we.can make our own memories with the new generations of family"
Tiffany Wadkins	US	2019-06-27	"This is a family event"
Jaquelin Senger	Caleighchester, NY	2019-06-27	"Josh spier"
Marco Campuzano Jr	Rancho Santa Margarita, US	2019-06-27	"It's where I lost my virginity and conceived my 1st born ��"
Wyatt shaffer	US	2019-06-27	"I grew up riding and would like my kids to ride"
Bher Jaimes	Fresno, US	2019-06-27	"I love camping and driving the best beach in California"
Ken Fowler	Campbell, US	2019-06-27	"Keep OUR land open to us!"
Damion Johnson	Chino, CA	2019-06-27	"We're losing to many of our rights and God given privelages to the environmental Marxist Kabal."
Jason fuller	Taft, CA	2019-06-27	"I grew up camping there as a little kid and loved going there to play in the water and ride in the dunes"
Brian Van WIe	lompoc, CA	2019-06-27	"This is good honest fun."
Lynette Fitch	Fresno,, CA	2019-06-27	"I love vacationing here with Children & enjoying the atmosphere"
DonnaRae Link	Santa Maria, CA	2019-06-27	"This is a right of passage for me and my Children. I'm ok with striker rules/ laws but don't close it down."
Colin Derosa	Rossland, Canada	2019-06-27	"I travel with my family from Canada to enjoy these dunes."

Name	Location	Date	Comment
Valarie Carte	Truckee, CA	2019-06-27	"My family loves the Ocean Dunes for over 50 years."
Anthony Sauceda	US	2019-06-27	"There's no reason to close the park. We've had it for so long for family and friends to gather and have a good time and good for business owners."
Dakota Dale	Nipomo, CA	2019-06-27	"Have spent a lot of time here since my teenage years. No longer drive on the beach much because I dont like what it does to my car but it should remain open. Are we going to take everything away from the youth until the only thing left to do is smoke dope in a church parking lot?"
natalie kellmann	Wilton, CA	2019-06-27	"We use the oceano dunes as a family camp place and love it"
Patricia Crum	Hemet, CA	2019-06-27	"We camp there every year. This land belongs to us, the American people. Please keep it open for all."
Buddy Brannon	Santa Maria, CA	2019-06-27	"The Oceano Dunes are a great place for all to enjoy. Please don't close the beach to vehicle access just to appease some rich Whiney people. They knew MVA was going on at the beach for the past several decades but still bought homes in the area. We should not have give up our right to enjoy the beach because of outsiders moving in."
Adriana Cardona	US	2019-06-27	"My family & I love camping & riding at the Oceano Dunes."
Taylor Baker	Anaheim, CA	2019-06-27	"Tired of California ruining this country"
Josh Perry	Merced, US	2019-06-27	"Seriously, the ocean brings the wind that creates the dust. We're you planning on paving the beach? How bout don't be stupid enough to build a house behind the sand dunes?? How did you think they came about in the first place? Beyond all that, this is a family vacation spot for all of us and a driving force for local economy."
James Carpenter	San Jose, US	2019-06-27	"Do not destroy local economy and good honest fun for so many families."
Anthony Rodriguez	Bakersfield, CA	2019-06-27	"Its a fun place for family fun"
Kris Sears	Waterford, US	2019-06-27	"Pismo beach is about history and memories"
Brad Lockwood	San Carlos, US	2019-06-27	"This is the only beach like this and it brings joy to so many people"
Paul Hobbs	US	2019-06-27	"Keep it open"
Michelle Whitten	US	2019-06-27	"I want to see the area open."
James Reams	Ojai, US	2019-06-27	"Don't let them take this away us!"
Haley talley	Visalia, CA	2019-06-27	"This is home and has so many memories for so many people. California doesn't have much else to offer these days!"
Miguel Garza	Madera, CA	2019-06-27	"I love taking my family camping out in the dunes"

Name	Location	Date	Comment
Andrea Garcia	Santa Maria, CA	2019-06-27	"I'm sighing because I love the dunes and even just taken those beautiful Sunday drives on the beach!!!"
Nick Calderon	Folsom, CA	2019-06-27	"This is a family thing every year. Why take that away. I want to take my kids and have them take their Kids."
Joseph Flores	Orange, CA	2019-06-27	"I want my children to experience life as those before them."
Kyle Christensen	Tracy, CA	2019-06-27	"Keep pismo open"
Sabrina Ruiz	Rancho Cucamonga, CA	2019-06-27	"California has taken enough from us and I'm tired of it."
Weston Sartin	Glendale, AZ	2019-06-27	"California does need to take anymore OHV areas away! THIS PLACE IS PERFECT AND SOME PEOPLE HAVE NEVER BEEN THAT HAVE ALWAYS WANTED TO GO!"
Sarah Morriss	Arcadia, US	2019-06-27	"My parents raised me and my siblings at this beach. It's where I first learned how to ride a quad. This place is the only place I feel close to my dad since past away. This beach means everything to me. Losing it would feel like I lost a part of me all over again."
Andrew Richardson	Modesto, CA	2019-06-27	"I love Pismo along with so many other people!!!"
Brittany Wilson	Moorpark, CA	2019-06-27	"Many memories at the dunes and its local businesses that I do not want taken away! California is already limited on open areas to ride OHV, and it would be angering and disappointing to see this closed."
Dedy Sinambela	beaumont, CA	2019-06-27	"We have great memories there"
Carlos Ramos	Tulare, CA	2019-06-27	"The dunes have been a family tradition for three generations! Do not close the dunes to rec vehicles!"
Mikaela Cohen	Henderson, NV	2019-06-27	"We lived in Pismo for 4 years and before that vacationed there many times each year. I can't imagine how negatively this closure will affect the local economy and the businesses our friends & past neighbors relied on to make a living. I stand to keep the dunes open."
Howel Melissa	Bakersfield, CA	2019-06-27	"Me and my kids have the best family memories there and want to make more"
Anthony Aiello	US	2019-06-27	"Respect Pismo!"
antonio zuniga	Antioch, CA	2019-06-27	"I been taking my kids there for long time"
Timothy Schaffner	Oceanside, CA	2019-06-27	"Love taking my family out there. This is bullshit because California wants to fuck over the people again. Fuck this state can't wait until I can move out. Two more years."
Linda Walker	Bakersfield, CA	2019-06-27	"I can't imagine after a lifetime of enjoying the dunes that it would suddenly be off limits! We are already losing a lot in California, and I really don't want we citizens to lose this too."

Name	Location	Date	Comment
Sergio Arias	Oakland, CA	2019-06-27	"This is my back yard a lot of great memories out at the dunes. I want my kids to enjoy them to."
Quinton Jackson	Bainbridge Island, WA	2019-06-27	"That dam organization is still at it. That would totally kill the pismo beach vibe"
Megan Medeiros	Winton, CA	2019-06-27	"I enjoy pismo."
Jarrad Stephens	Visalia, CA	2019-06-27	"•
William Santos	Modesto, CA	2019-06-27	"Its not right for them to shut down a place that has been ridden for decades"
Vinnie Sottile	Paso Robles, CA	2019-06-27	"I have been enjoying the dunes for 28 years now. Would be a life changer for me if they were to close down the dunes. We all want to keep the little part of the dunes we have left."
Andrew Navarro	Anchorage, AK	2019-06-27	"I am"
Crystal Flud	Visalia, CA	2019-06-27	"Place where family goes."
Kirk Morgan	Santa Maria, CA	2019-06-27	"Its wrong"
rick oldham	Arroyo Grande, CA	2019-06-27	"Leave it alone"
Clayton Davis	Jamestown, CA	2019-06-27	"Greatest place on Earth love being here and making memories with family and friends would be such a shame if they closed it"
Noah Mattos	San Diego, CA	2019-06-27	"The dunes are an amazing part of nature and a fun family place to play in the sand"
Dan Pineau	Fresno, CA	2019-06-27	"Dan Pineau"
Celestino Rodriguez	Delano, CA	2019-06-27	"Because it's a escape from the valley for us"
Jaime Baquera	Oakland, US	2019-06-27	"I think closing this is wrong"
tina carmo	Stevinson, CA	2019-06-27	"This is where I take my family for vacation, we stay on the beach and my 7 and 10 year old have the best time of their life out in the dunes, it's a great place for families to go."
Courtney Schmidt	San Jose, CA	2019-06-27	"We love spending time on the beach camping and enjoying the dunes."
Beatrice Rodriguez	Oceano, CA	2019-06-27	"To keep Oceano Dunes Open."
Joey Morneault	California	2019-06-27	"I love camping in the dunes with my family. It would be such a shame if this family tradition was taken away. So many memories. I would love to make more memories there in the future."
Nick Sousa	Turlock, CA	2019-06-27	"I love to ride and this isn't communist China."

Name	Location	Date	Comment
kay phillips	Santa Maria, CA	2019-06-27	"Is California going to shut down everything enjoyable , kids have nothing to do know, and families need to spend more time with each other and outside instead of on computers and phones"
PAT CARTER	BAKERSFIELD, CA	2019-06-27	"Grew up going there and my son was killed there and it was by a local that did a very stupid thing. I myself went through this when he got killed of people wanting to close the dunes and I am speaking for my deceased son and myself DO NOT close the dunes. Keep them open for people to enjoy, and for the owners of businesses in the area that rely on the people that go to the dunes."
Troy Moss	Yuba City, CA	2019-06-27	"Keep it openPut more trash cans out and maybe fine people for leaving trash but leave open"
kyle evans	Thousand Oaks, CA	2019-06-27	"No way this place should be closed"
Brenda Maciel	Hanford, US	2019-06-27	"Ocean Dunes has been a family affair for us since the 1970's. My husband and I started going to the dunes as individuals. We got married and continued our adventures at Ocean Dunes. We had children and taught them to LOVE the dunes. Now we are visiting the dunes with our children, their spouses/significant other and our granddaughter. It has always been 1 location where the whole family can go together and really enjoy ourselves."
Dani LeVine	San Luis Obispo, CA	2019-06-27	"The dust will still be there because the wind will still be there!!"
efren alvares	oceano, CA	2019-06-27	"I lived My whole life in Oceano and shutting down the dunes would break our economy as we depend on the tourism for local businesses to survive."
Andrew Beebe	Santa Maria, CA	2019-06-27	"Andrew beebe"
Elizabeth Carreiro	Artesia, CA	2019-06-27	"My family and I enjoy spending time at the dunes and sightseeing around town. My young boys will be very sad if we can't go back to ride."
Katrina Witt	Bakersfield, CA	2019-06-27	"I have been enjoying the dunes since I was a child with all my family. I now take my kids and have the best time. The dunes is the only reason we visit pismo."
Kelly Bridgford	Hughson, CA	2019-06-27	"Kelly Bridgford"
Tiffany Mansfield	US	2019-06-27	"I love the dunes♥#"
Patrick Brian	US	2019-06-27	"I believe we should keep this open."
Renee Flowers	Delhi, CA	2019-06-27	"We Love the Dunes!"
Lidubona Arroyo	Desert Hot Springs, US	2019-06-27	"Lidubina arroyo"
cathy annis	buffalo, NY	2019-06-27	"For the campers"
Jed Hensley	US	2019-06-27	"Ca cost is corrupt"

Name	Location	Date	Comment
Anastacia Bolderoff	Rancho Cordova, CA	2019-06-27	"We love the dunes and enjoy camping and having clean family fun!! Are we going to close the freewAys because of drunk drivers or because people text in a 2-3 ton vehicle going 70 mphand kill people dailyum nothey won't and haven'tso please leave our dunes open!!"
Laurie Mello	Hanford, CA	2019-06-27	"Laurie Mello"
Jeanette Baker	Dos Palos, CA	2019-06-27	"This is the one place that we go with friends and family that we can all get together. Something we look forward to. Pismo is my happy place!!"
Melissa Howard	Mountain Ranch, CA	2019-06-27	"This place is our family memory place . Well never Wana stop going and doing what we love with the ones we love"
Vicki Chapman	Oceano, CA	2019-06-27	"I love the dunes! My husband and I moved here so we could enjoy the clean air and the dunes!"
Isaac Valdez	Arroyo Grande, CA	2019-06-27	"Let the people choose, NOT THE MONEY"
Kenneth Briggs	Atascadero, CA	2019-06-27	"The park has been for many years and those later residing nearby KNEW what was!!"
Alissa Baker	Corcoran, CA	2019-06-27	"It's a vocational area where families go to make memories!"
Hunter Giffin	US	2019-06-27	"I am passionate about riding and keeping the riders rights without riding are you really having fun"
CHARLES BRADFORD	Los Angeles, US	2019-06-27	"California needs to stop restricting access to public lands, period."
Elder Fagunded	San Carlos, CA	2019-06-27	"I am signing cause pismo is a family event place."
Maria Rodriguez	US	2019-06-27	"Maria Rodriguez"
Christopher Kueneman	Bakersfield, CA	2019-06-27	"My entire family have been camping, riding and enjoying the dunes for YEARS! We have never caused trouble, been in trouble or disrespected the environment. Please consider other options."
Susan Carlotti/Westerman	Riverbank, CA	2019-06-27	"Having HOV and camping parks need to be Open for families to enjoy."
Alex Garcia	Grand Junction, CO	2019-06-27	"I'm signing with high hopes"
Brien Evans	California, CA	2019-06-27	"We need this. They keep infringing on our rights. Sooner or later all of our freedoms will be removed"
Isaiah MAGANA	Santa Maria, US	2019-06-27	"My family and I go to the dunes to have fun and relax because no where else that's close allows us to do this."
Randi Deason	Ojai, CA	2019-06-27	"I grew up going here. Camping with family and friends. It's a safe and wonderful place."
Todd Ballantine	North holly wood, CA	2019-06-27	"Todd Ballentine"

Name	Location	Date	Comment
Jenni MacDonald	Antelope, CA	2019-06-27	"I have great memories of riding the dunes, and always hope to go back."
Matt Cox	San diego, US	2019-06-27	"I feel that we pay ohv taxesbut they keep trying to take ohv areas"
Benjamin Diblasio	Granada Hills, US	2019-06-27	"Because this is where my family and friends make great memories every year!"
Ethan Cohen	Pismo Beach, CA	2019-06-27	"The surrounding cities depend on the dunes and all that visit, many businesses cater to the visitors each weekend, and a few exist in the area solely because of the dunes. The closing of Oceano Dunes will signal that there will be more closures to come, and our other favorite spots will be next."
Carl Passant	Grover Beach, CA	2019-06-27	"Its our main tourist attraction from people all acriss America and the WORLD!!! It brings in so much revenue. People will stop coming to this town if they are not allowed to go on their beach with their off road utility vehicles and it will turn this town into a ghost town. Not only that but I feel the air quality situation has been exaggerated"
ryan labar	Vacaville, CA	2019-06-27	"I want options to ride and would hate to shut down a major economic booster down there."
Ygnacio Robles	Santa ynez, CA	2019-06-27	"Dang right"
leobardo hernandez	Greenfield, CA	2019-06-27	"This is what my family loves."
theresa agatenzo	Marysville, CA	2019-06-27	"My family attends and would like it to stay open"
Mitch Kaye	Newbury Park, CA	2019-06-27	"I want to keep the beach open for ohv."
Michael Bratcher	Merced, CA	2019-06-27	"Michael Bratcher"
Amy Van Scoter	Morgan Hill, CA	2019-06-27	"I've spent most of my years camping in the dunes! Now I get to share that experience with my kids who love it! Nothing like Pismo. We will be heart broken to have that taken away!!"
Love O'Mary	Paradise, CA	2019-06-27	"This is a wonderful place to go and spend time with the family."
Clay Walker	Kerman, CA	2019-06-27	"Family goes out there every year to enjoy beauty and to just get a from the hustle and bussle"
Dustin Mileham	Reno, NV	2019-06-27	"It's not right to take away our freedom."
Sergio Gamez	Santa Maria, US	2019-06-27	"This is our local ohv beach"
Paul Garcia	Cerritos, CA	2019-06-27	"I'm in favor for keeping it open"
Kylie Martins	Tulare, CA	2019-06-27	"I'm signing because this place is a second home to my family and myself. Plus with out it, there will be so many people out of jobs."

Name	Location	Date	Comment
Jeremiah Lindquist	Portland, OR	2019-06-27	"It's great entertainment for all shapes and sizes. Great memories don't take it away."
Karen King	Bakersfield, CA	2019-06-27	"I believe the land belongs to us.so closing the park hurts us"
jenna russell	San Jose, CA	2019-06-27	"I have been responsibly using this area for years. it would be a shame to no longer be able to visit here"
Pauline Buckley	Brian Head, UT	2019-06-27	"I want to protect people rights to ride"
Matthew Richardson	Alamo, CA	2019-06-27	"It's a fun place to hang out with friends and family and it helps the local economy"
Rose Contreras	Kingsburg, US	2019-06-27	"It shouldn't be ruined for everyone because some people are dumb."
Samantha Mendes	Hanford, CA	2019-06-27	"Our family loves the dunes. We have raised our children to be safe and responsible riders out there. We want to eventually do the same when we have grandchildren. We're tired of the special interest groups in California ruining what used to be such a great place to raise a family!"
Timothy Garner	Fresno, CA	2019-06-27	"I camp at pismo beach and also ride in the dunes would hate to see it go a lot of family adventure and memory out there as a kid and an adult"
Hayley Wagner	Rohnert Park, CA	2019-06-27	"I've never been and I've always wanted to go."
Rodney DeShields	Porterville, US	2019-06-27	"Keep the beach open for camping and riding."
Tyler Pedigo	Rosamond, CA	2019-06-27	"I've grown up going to this place and it's got smaller and smaller over the years. It's sad. I asked my wife to marry me at this beach I have had so many memories and want to make more please keep this place open for offroad use. The more parks you close the more you push tax paying residents out of California. Keep are parks open."
garth nethington	Orland, CA	2019-06-27	"I have family in this area and would love to camp and play on the beach !!"
Toni-Rae Cerda	Fresno, US	2019-06-27	"I want to support my friend keanah !"
Victoria Contreras	Salinas, US	2019-06-27	"Never been, but for the future I'd one day like to go. And how could I go if it's closed forever?"
Tracy Callaway	Fresno, US	2019-06-27	"I have many happy memories of time spent on this beachit is my happy place."
Teodoro Sanchez	Earlimart, US	2019-06-27	"I love pismo beach a lot because it's fun i support it and always will �"
Madri Sherman	Manteca, CA	2019-06-27	"I love pismo!"
Nicole De Motte	Ithaca, NY	2019-06-27	"Children needs recreational sites & good clean fun."

Name	Location	Date	Comment
John Clark	Lompoc, CA	2019-06-27	"This needs to stay accessible for families to continue to have FUN. Government has taken too much away already. I have been going since childhood. We take our children now. Keep this open. Let's get it all opened back up!!"
Charlene Rebish	US	2019-06-27	"Because this is a place where family and friends can enjoy riding are atv and camping roasting marshmallows and tell stories and enjoy the beach"
josh eastman	Beaverton, OR	2019-06-27	"There's no reason to be shutting another ohv area down and Pismo has a ton of history. Quit taking fun away from people."
DeLinda Gaither	Porterville, US	2019-06-27	"My family and friends love camping and walking on the beach and riding the dunes. The kids young and old love playing in the sand. Love all the memories we have made here and would like to continue making more great memories!"
Bruce Jones	Lodi, CA	2019-06-27	"Freedom"
Evangelina Baro	Santa Maria, US	2019-06-27	"The dunes have impacted many generations in my family! I have a picture of my grandma sitting on the hood of her car, on the Oceano dunes. A pic from the 60s! I have other pics from when I was 3 at the dunes for Fourth of July weekend! I wanna keep the memories going down to my grand kids too!"
Ryan Hugo	US	2019-06-27	"Pismo is fucking dopedon't close it man"
Amber Preheim	Reedley, CA	2019-06-27	"I don't want to lose this amazing family recreation area due to classism and bad politics."
William Rider	Rohnert Park, CA	2019-06-27	"We need ohv"
Barbara Zischka	Dublin, CA	2019-06-27	"Barbara Zischka"
Michael Salters	Bakersfield, CA	2019-06-27	"Over reaching government control needs to be addressed .Please keep these dunes open for OHV"
Jennifer Morrison	Concord, CA	2019-06-27	"This is important to friends of mine and that's all that matters!"
Coalton Marple	Fresno, CA	2019-06-27	"I have never got a chance to ride on the dunes yet"
billy cooper	Porterville, CA	2019-06-27	"This area has been a go to spot since I was a kid and still is. Too many family members of everyone not just I have taken place here.it would be wrong to take this away from us."
Jason Soto	Denver, CO	2019-06-27	"The government has closed enough"
Felipe Beltran	Hollister, CA	2019-06-27	"Keep the dunes OPEN!"
Jill Aldeen	La Palma, CA	2019-06-27	"I love the dunes with my family"
Skye Clawson	Coulterville, CA	2019-06-27	"The Clawson family as been going there forever it's sooooo much fun"

Name	Location	Date	Comment
Skylyn Reynoso	Tulare, CA	2019-06-27	"I'm signing because this park has always been a go to spot to camp at for my family for many years & I would like to continue to create memories there with my own family"
Elvis Castaneda	Fairfield, CA	2019-06-27	"I've been visiting the park for years for OHV use and I want to share the same experiences with my children."
Shannon Scruggs	Fresno, CA	2019-06-27	"I grew to here! This is my home away from home it's a huge tourist attraction, families come from all over to have bbqs, bon fires and play with their off-road vehicles, it's not right to close itthat's just another thing they are trying to take away from us smh"
Edward White	Los Angeles, CA	2019-06-27	"I believe people need places like this to unwind from the grind and live a little."
Jeff harmonson	Fresno, CA	2019-06-27	"My family enjoys the dunes."
Phillip Pistoresi	Madera, CA	2019-06-27	"I believe in allowing use of our public lands for Motorsports and camping."
Kevin Mccann	Newbury Park, CA	2019-06-27	"This is our land."
Ramiro Iniguez jr	Bakersfield, CA	2019-06-27	"I love océano dunes I've been going there since a kid and want to continue with my friends and family"
Joe Wilson	Sahuarita, AZ	2019-06-27	"I am an atv utv offroad enthusiast. The rights to use our public lands need to be maintained. Our rights are being stolen."
Randall Gannon	Shafter, US	2019-06-27	"Must keep the Dunes open"
Debi Goforth	Visalia, CA	2019-06-27	"I love the dunes and have been going for many years"
Kelsea Cecconi	Murrieta, CA	2019-06-27	"I love our desert and love camping in them."
David Chezem	Citrus Heights, CA	2019-06-27	"Love riding at Oceano! Love visiting the town of Pismo."
zack niemi	Hancock, MI	2019-06-27	"California will ruin the fun for everyone if I don't! Pismo beach is an awesome place for families to go and enjoy the beach and ATVs it's also huge for surrounding cities/towns to generate revenue"
Gaylen Barber	Stockton, CA	2019-06-27	"It's an important recreational area."
Ryan Connon	Kearns, UT	2019-06-27	"I signed this posting because I have a great time at the dunes camping with my Jeep! KEEP PUBLIC LAND OPEN!!!"
Robert Navales	Anaheim, CA	2019-06-27	"Fuck the tree huggers and liberal nazi's."
Tanner Smit	Lodi, CA	2019-06-27	"We need recreation keep the dunes open so many ppl have so many memories there and plenty more to make"
Shelbi McKay	Riverdale, CA	2019-06-27	"Shelbi mckay"
Cameron Littlecreek	Fresno, CA	2019-06-27	"I love riding and family time on the dunes"

Name	Location	Date	Comment
david dingle	Taft, CA	2019-06-27	"I grew up camping here and want the same for my kids and future generations. So many memories there. Just something else california wants to overstep and regulate on."
Jose Acosta	El Paso, TX	2019-06-27	"I support all types of outdoor activities, specially OHV!"
Maria Alcaraz	Nipomo, CA	2019-06-27	"It's a family tradition for many that go for the holidays."
Anthony harrison	Visalia, CA	2019-06-27	"Dunes equals money"
Zachary Perreira	San Francisco, CA	2019-06-27	"Great times with bad friends 落"
Todd Ashley	Ventura, CA	2019-06-27	"California leadership is corrupt and this land is ours. The citizens of the United States of America."
Ryan Taylor	Bakersfield, US	2019-06-27	"Ryan Taylor"
Xander Arthur	uneeda, WV	2019-06-27	"I ride there"
christine dial	Arroyo Grande, CA	2019-06-27	"It's ridiculous that you Dam people would think to close it! It's our only form of income for our small community! Pismo is rich on hotel endorsements! Shell beach has wealthy people with old money! Grover beach and Oceano get minimal funding! Stop with the ridiculous crap already and concentrate on real concerns in CA! I'm a local here there is nothing wrong with people camping and riding the bikes out here! There is worse air quality in LA that needs to be attended too!"
Chris Gibson	Chowchilla, CA	2019-06-27	"I love going to the dunes"
Jacob Murray	US	2019-06-27	"why Not"
Sam silbernagel	Scio, OR	2019-06-27	"I love the dunes grew up their myHole life"
Jenn Wilson	Castaic, CA	2019-06-27	"I love this area and riding. We really love this area and there is nothing like riding here."
J Tilley	Santa Maria, US	2019-06-27	"Keep the dunes open. Find a way to resolve any issues or concerns"
Scott Vincent	Wildomar, CA	2019-06-27	"I'm signing because all the families that love and enjoy this place and grew up going here could lose something they cherish could you Imagine all the fun times and memories lost"
Cheryln Staas	Fair Oaks, CA	2019-06-27	"Places like this need to stay open!"
Roberto Perez	Sonoma, CA	2019-06-27	"Let the people have fun."
Timothy Carr	Stockton, CA	2019-06-27	"Need to keep this place open to is not the camping and the off road use that is creating the sand to blow around it's a thing called the wind"
Beth Shell	Tucson, AZ	2019-06-27	"I love Pismo beach. Oceanic dunes."

Name	Location	Date	Comment
Gregory Amos	Fresno, CA	2019-06-27	"Gregory L Amos"
Demaree Soliz	Corcoran, US	2019-06-27	"I love this place ��♥#"
Kris Blair	American Falls, ID	2019-06-27	"Keeping recreational access open for future generations is important!"
Michael Moreda	Valley Ford, CA	2019-06-27	"There are miles and miles of coastline. Why can't we have a couple for OHV?"
George Dye	Ventura, CA	2019-06-27	"OHV riding is fun. Pismo offers a unique way to experience nature in an otherwise ordinary beach that would not attract the over two million users from far and wide annually."
Holly Welch	Wheatland, CA	2019-06-27	"The Public owns the land and should be able to use it as it is intended."
Kaylen Tinker	Porterville, CA	2019-06-27	"We love going to this place. If it closes we wont go back to pismo. There no parking by the pier so this was somewhere we could easily go and take the kids."
Griselda Dominguez	San Jose, CA	2019-06-27	"It's a CA staple"
Damaris Bernard	Bakersfield, US	2019-06-27	"I have many memories of going to the Oceano Dunes and Pismo Beach. Please don't close them down. Our kids and grandkids need to have the chance to make some memories of their own there."
Wyatt Jones	Middletown, CA	2019-06-27	"I love have a good place to go to the dunes in my Sand-rail in California and its only a few hours away"
Leah Rutledge	Visalia, CA	2019-06-27	"This is an amazing place for families and the community. Shutting it down will hurt the whole community!"
Cathleen Cipriano	Pleasanton, CA	2019-06-27	"I'm signing because my family has been going for 15 yrs straight"
Kawika Storch	Huntington Beach, CA	2019-06-27	"Kawika Storch"
Omar Guevara	Santa Maria, CA	2019-06-27	"I love going to the dunes with my family. Love riding"
Heidi Owen	Monrovia, CA	2019-06-27	"It's a beautiful place, one of the only places like it. Please reconsider"
Giomar Pineda	Dublin, US	2019-06-27	"I'm signing this petition"
jeff glowniak	San Mateo, CA	2019-06-27	"I've been there a few times. It's a family fun activity"
Donald Sears	Taft, CA	2019-06-27	"Let them have the fun they deserve"
mary leonard	Lompoc, CA	2019-06-27	"It needs to stay open"
Omar Guevara	Santa Maria, CA	2019-06-27	"Love the dunes don't take it away"
Steve Ulrich	Reno, NV	2019-06-27	"The dunes belong to the public not some NIMBY locals and phoney environmentalists. This is a place for families to enjoy and the only

Name	Location	Date	Comment
			place left in California like it. The air quality issue is a joke, drummed up because they have nothing left to justify closing it."
Tino Palmoutsos	Saugus, CA	2019-06-27	"I have gone to pismo dunes since I was a little kid. I would like to have my kids share the same type of memory."
Amanda Villa	Apple Valley, CA	2019-06-27	"I love this place grew up going here"
Melanie Herrera	Livermore, CA	2019-06-27	"Please keep it open to �"
Austin Hickerson	Tulare, US	2019-06-27	"This is just the start of the government taking more freedoms we are able to enjoy in this country."
Sara Price	Bakersfield, CA	2019-06-27	"I have been going to the dunes my whole life, and my kids and I want it to continue for many generations to come. There needs to be more safety rules in place to protect people though"
Chad Wilson	Cottonwood, CA	2019-06-27	"We need our areas to ride"
Dalton Thibault	Grover Beach, CA	2019-06-27	"This is my backyard, what I grew up on, spend freetime at, and it's what keeps the mom and pop business open in the surrounding areas"
Christmas Colazzo	Bakersfield, CA	2019-06-27	"Without the family attraction of the dunes families will be compromised, youth will turns to gangs and other bad behavior, obesity will get even worse, Pismo will lose money. The wildlife on the dunes can be relocated."
Susan Hightower	Avenal, CA	2019-06-27	"I love the dunes and camping on the beach"
Michelle stewart	Long Beach, CA	2019-06-27	"Riding is great family / friend fun and has been a long standing tradition several times a year!"
Elizabeth Norris	Riverdale, CA	2019-06-27	"I have many memories on this beach with my family and would like to create many more now that I have kids of my own"
Jimmy Holland	Bakersfield, US	2019-06-27	"It's a nice place to get away to have fun with friends and family"
Matthew Corda	Salinas, CA	2019-06-27	"Im signing because camp grounds should stay open"
Tony Chacon	Beverly Hills, CA	2019-06-27	"The people deserve To have a great time with their friends and family."
james allen	Lake Isabella, CA	2019-06-27	"Sick of the California Coastal commission trying to steal our public lands from us"
Manuel Tinajero	Los Angeles, CA	2019-06-27	"Its our family trip. We enjoy nature."
Viri Wells	Fresno, CA	2019-06-27	"Even if the park closes that will not stop mother nature . The sand will still blow and the high winds will still remain. This is the only place i know of where my kids can enjoy camping on the beach. Why close it, makes no sense"
Willia Long	Seoul, South Korea	2019-06-27	"Because it's a great place"

Name	Location	Date	Comment
Erin Smith	Concord, CA	2019-06-27	" I am signing this petition because I raised my kids off-roading at Oceano dunes. They were raised to respect the land and to haul out more than they hauled in and never leave it dirtier than they found it. Off-roading helped them become very safe drivers as well. Now that they are adults, they to are raising their children in the same manner. Please leave Oceano Dunes open for future generations to experience and appreciate."
kymberley sanders	imperial, CA	2019-06-27	"I want to keep our freedom to camp."
Dennis Bailon	San Marcos, CA	2019-06-27	"I am signing this due to the lack of intelligence of our political people. If we let the Government take everything we love we will end up going crazy. People need things like this to vent and explore the world. Take our minds off of things. This place has saved life's as well."
Jose Reveles	Oxnard, US	2019-06-27	"I go there with my family 100 were there 6/21/19"
Germain Gabaldon	Riverside, CA	2019-06-27	"I think. Its pointless to shut down something that people can. Have fun in"
Scott Kendall	Torrance, CA	2019-06-27	"One of the few places leftand I still need to rake my son there to ride"
Crystal Neal	US	2019-06-27	"we love it there"
Daniel Gonzalez	Fresno, CA	2019-06-27	"Taylor Dildine is a G"
Arturo Valladolid	Rock Springs, US	2019-06-27	"We love there"
Charles Rodgers	San Marcos, US	2019-06-27	"������ Keep us free. Keep are lands free."
Scott Brown	Trabuco Canyon, CA	2019-06-27	"It is our right as citizens to use this land."
jon simms	Carlsbad, CA	2019-06-27	"We need to save our rights as free humans to enjoy our things and not be forced to stop when it's not hurting anything"
Gary Nelson	San Jose, US	2019-06-27	"We have been using this park since we were kids. You have done nothing but try and take all our Parks from us. This should be left alone for our kids to enjoy as we have. There is no harm being done here at all., so leave it be"
Monica Marcim	Porterville, CA	2019-06-27	"Monica Gahler-Marcom"
Garrett Roelling	Modesto, US	2019-06-27	"I'm signing because I came here so much ass a child and it was the best time of my life"
James Blackburn	Lehi, UT	2019-06-27	"This is such a fun place would be sad to see it shut down and that would just make other places even more crowded!"
Shant Bashian	Rancho Cucamonga, CA	2019-06-27	"This is a very important area for all of us including local businesses."

Name	Location	Date	Comment
Gloria Furnari	Covina, US	2019-06-27	"I've have enjoyed riding in the dunes for 40 plus years with my family and want to continue to do so."
Kathryn Macedo	Hanford, CA	2019-06-27	"I'm signing this as this place holds a lot of sentimental value to my family, friends, and myself. The Dunes as they're lovingly referred to provide a fun, family friendly gathering place for many of us. Please do not take this away from the thousands of families that gather there."
Melissa Bean	Porterville, OR	2019-06-27	"Melissa Bean we need to keep it open"
Peggy Daunis	UPland, CA	2019-06-27	"Coastal land is for everyone in the country to enjoy! If there are problems, identify the source and come up with solutions, don't close such a popular and beautiful area to everyone."
Daniel Welsh	Phelan, CA	2019-06-27	"I like to ride!"
Valeria Reyes	Lemoore, US	2019-06-27	"I'm signing because Oceano Dunes means much more than a get away weekend to ride quads and camp. It is the only beach nearby that allows campers and I've been going there all my life. It is my happy place to even go and walk for the day."
Mike Bath	Canyon Country, CA	2019-06-27	"I have enjoyed the dunes for over 4 decades both and I would hope they would remain open so my kids can enjoy them with their kids."
Chris Chadwick	Madera, CA	2019-06-27	"Help save our beach. The best times if my life have been spent riding the dunes and camping on the beach."
Lin Buhlman	Concord, CA	2019-06-27	"The beach is a public place and the revenue it brings in each year."
Brian Itterly	Morgan Hill, CA	2019-06-27	"I miss clear creek and don't want to miss the dunes"
Sharlyn Medcoff	Anchorage, AK	2019-06-27	"Visited California memorial day weekend from Alaska just to go to the Dunes. No Dunes, no reason to go to Cali."
Cesar Medina	Santa Clarita, US	2019-06-27	"Build a RV access that avoids water crossing to keep the sea clean. Less pollution and safer for all involved."
Jeffrey Smith	San Dimas, US	2019-06-27	"Oceano dune is best for camping/ ridding during summer time becuse it cooler and nice weather"
Lyndi Love-Haning	Nipomo, CA	2019-06-27	"Remember, donating to change.org after you sign does not help the fight to keep the dunes open. It just goes to change.org. Please donate directly to Friends of Oceano Dunes at <a href="http://www.OceanoDunes.org" rel="nofollow">www.OceanoDunes.org</a> to help fund the efforts!"
Samuel Burris	Anderson, CA	2019-06-27	"I'm signing because many recreational riding areas are starting to close and become very restricted. There shouldn't ever be a day where all the fun and family traditions I've experienced every year will become just a story and not a tradition carried on to my children. I've always made it a priority to make the campsites cleaner than I found it and many other people I've met follow by

Name	Location	Date	Comment
			the same views. Don't strip this freedom that many families have enjoyed over the years"
Diana Foster	Arroyo Grande, CA	2019-06-27	"Without tourism there will be many failed small businesses, that's what the dunes provide."
Roberta Mendoza	Reno, CA	2019-06-27	"Roberta Mendoza"
Nick Parker	Arroyo Grande, CA	2019-06-27	"We all love the dunes keep them open"
Tiffany Gafford	US	2019-06-27	"It's our right!!"
Emanuel Haase	Fallon, NV	2019-06-27	"I have been there many times with my family growing up. This needs to stay open for future families to enjoy"
Austin Miller	Dallas, US	2019-06-27	"I have family and friends in California who work at and enjoy these parks and while I may live in TX, I certainly have seen the beauty of the CA parks and oceans."
Melissa Bura	Taft, CA	2019-06-27	"A lot of the Reason people visit the Beach is for the dunes. Don't take away a family place where wonderful memories have been made and will continue."
Tony Beal	Hollister, CA	2019-06-27	"Keep Pismo open why you ask I'm sure I'm not the only person with family but we do a family/friends annual trip every year for the pass 7 years. First year we went it was just 3 families and after that we would get more friends and family to join this year is the 8th annual trip and there is 27 families going with about 20 kids from all ages that will be there. Pismo has brought people and family together we're every one makes sure their there for the family/friends annual trip."
Terrie Lopez	Modesto, CA	2019-06-27	"We enjoy our vacations there we look forward to a week long break at thanksgiving."
Israel Alarcon	Paso Robles, US	2019-06-27	"So many memories are born there its kind of hard to not have it open for public so it can keep making memories as they come"
Mark Errecart	Squaw Valley, CA	2019-06-27	"This Government has Regulated & Restricted so much of our State, so that it is hard to enjoy anything anymore :(Beaches are already So limited, it's like local residents think they own them or something!!This is Our State, our Taxes pay for services provided, of course pretty much everything also now has an additional charge for this & that, it is ridiculous :(What, for the environment??Give me a break!!Let our Citizens Enjoy our Freedoms!!"
ASHLEY Watson	San dimas, CA	2019-06-27	"I would like to take my family"
Heather Dobbins	Albany, OR	2019-06-27	"My family, friends and I have loved the dines our wholes lives. ##"
Tyler Lathouwers	Bakersfield, US	2019-06-27	"It's the only reason I go to the beach"
Jana Pastorino	Dublin, CA	2019-06-27	"We need to keep parks open for families to keep making memories.  One of my favorite memory is of my family going camping at a park

Name	Location	Date	Comment
			when they were still at home. It was so fun and a great memory for all!!"
Kathy Lowe	Sunland, CA	2019-06-27	"So many memories made there!"
Sandra Totty	Visalia, US	2019-06-27	"The park belongs to the people!"
Greg Henry	Tulare, US	2019-06-27	"We went for a week every summer on the beach. Lots of family memories."
Elida De Ayala	Coalinga, CA	2019-06-27	"Elida Ayala"
Jonathan Bowers	Santa Barbara, CA	2019-06-27	"I grew up here and it's the last place of it's kind on the central coast."
Julia Metzler	Alta Loma, CA	2019-06-27	"We have come here for several generations. Our family owns property on Stimson and would be devastated by the change. Not to mention the severe hit the area would take due to decrease in tourism"
Danielle Alvarado	Madera, CA	2019-06-27	"I'm signing because I love dirt bikes and people should be able to enjoy ridding on the dunes for many years to come"
Justin Willam	US	2019-06-27	"I like offroad sports and people need to get a life, atleast theyre doing something fun. Eff off haterz"
Sue Flores	Ewa Beach, HI	2019-06-27	"I was asked by my love"
Chrissy Day	Sonora, CA	2019-06-27	"I love the dunes"
Mari LaRocco	Ontario, CA	2019-06-27	"Mari LaRocco"
Kim Barbieri	US	2019-06-27	"I'm a Duner who utilizes this recreational area!"
Vanessa Torres	Tulare, CA	2019-06-27	"I'm signing this because I remember coming to the pismo dunes as a kid. It was/is my get away place there was never a bad time. Now that I'm a mother I want to take my daughter to pismo dunes and show her what me and her dad would do for fun. I want her to grow up wanting to vacation in the dunes so when she gets older and has kids she'll take them to."
Melissa Scheller	Groveland, CA	2019-06-27	"The beach and camping on the beach is good for my soul. My family loves going there and I'd like it to be enjoyed for generations."
David Waldman	San Francisco, CA	2019-06-27	"David Waldman 11655 Cenegal Road"
Greg Palmer	Ventura, CA	2019-06-27	"I have so many good memories out there and shutting it down would ruin the chances of others having the same kinds of memories. Stop ruining this state!"
Antonio Mcintyre	Lancaster, CA	2019-06-27	"A great family vacation get away we travel twice a year for our annual pismo trips we support local businesses love the small town"

Name	Location	Date	Comment
Cary White	Louisville, KY	2019-06-27	"It's a beautiful place for families to camp. You have the best of both worlds, sand and the ocean. It's a place that you can camp year round."
Joy Stone	fountain valley, CA	2019-06-27	"This needs to stop they are trying to take away more and more family oriented things."
Bryan Johnston	Sanford, US	2019-06-27	"Ypu cant close pismo"
Michael Serrano	Los Angeles, CA	2019-06-27	"I ride"
Frank Freitas	Livingston, CA	2019-06-27	"Our dunes our choice"
Richard Howard	Hayward, US	2019-06-27	"We love our area"
Emanuel Bettencourt	Marysville, CA	2019-06-27	"Cool place to go"
William Courson	Hacienda Heights, US	2019-06-27	"Love the dunes, have enjoyed camping and riding here. Great place to spend the weekend"
Juan Franco	Santa Maria, US	2019-06-27	"The dunes brings in great revenue to surrounding cities"
Trystin Parent	Central point, OR	2019-06-27	"Kate browns a piece of shit"
Bailey Silveira	Hanford, CA	2019-06-27	"One of my favorite memories growing up is camping at the dunes with my family and enjoying the dunes in our Jeep. It saddens me to think that many families will be deprived of the ability to forge their own memories here should camping and OHV use become prohibited. This state already regulates so much of our lives, we mustn't allow them to take experiencing this treasure from us as well."
Robert White	Modesto, CA	2019-06-27	"Pismo beach has always been close to the heart from my youngest days learning to ride and living life full of smiles to fighting to keep this park open for generations to come back and enjoy with their families the whole experience of the town and camping"
Bryce Arredondo	Folsom, US	2019-06-27	"Let's go"
Paula Taylor-crowe	Sonora, CA	2019-06-27	"What is the real reason???"
Deanna Peek	Pismo Beach, CA	2019-06-27	"Childhood memories with my family."
Charles Willoughby	San Jose, US	2019-06-27	" I've spent almost every summer of my life at the oceans dunes off highway vehicle park Please help us keep memories alive"
Dearlene Wiggins	Grass Valley, CA	2019-06-27	"We need a safe family fun place to be"
Jan Gatto	Indianapolis, IN	2019-06-27	"Jon Sims is a good honest person and he's a good friend of mine with high integrity"
Devon Phillipson	Rancho Cucamonga, CA	2019-06-27	"Protect the economy surrounding this gem of a State Park! Protect the rights of the people to ride!"

Name	Location	Date	Comment
Lacey Standley	Sacramento, CA	2019-06-27	"Lacey Standley"
Ryan Maxwell	Visalia, CA	2019-06-27	"Grew up going to the dunes it's always been a great place just needs a few more rules"
Toka Kuma	Nipomo, CA	2019-06-27	"We love going to the beach and camping or having bomb fires and it's good for our economy You can't close it"
Tony Fernandez	Gilroy, CA	2019-06-27	"Its a family fun spot"
Brandon Arbaugh	Fresno, CA	2019-06-27	"This is home away from home. We Go at least 5 to 6 times a year."
Phillip Roberson	Santa Cruz, US	2019-06-27	"I'm interested to show up at the meeting in SLO on July 11th to show my support for keeping open???"
Lisa Rivera	Bakersfield, CA	2019-06-27	"Been going to the dunes for years! It's a great place for family. I'd hate to see the privilege of driving on the beach to end."
Salina Grayson	Tustin, CA	2019-06-27	"Friend"
Garrett Prado	Agoura Hills, CA	2019-06-27	"The dunes rocks!!"
Shelley Coito	Kerman, US	2019-06-27	"Don't take our beach away and great family atmosphere."
Bryce Smith	Santa Maria, US	2019-06-27	"Does anybody know why they want to close it ?"
Katharina Wolter	Germany	2019-06-27	"I am against closing oceano dunes for OHV"
Michelle smith	Fresno, CA	2019-06-27	"Kimberly gutier"
Amy Shaw	Ceres, US	2019-06-27	"I have never gone and this is something I have always wanted to do. I want my chance!"
Dylan Hulsey	Exeter, US	2019-06-27	"I am signing this because I've been coming to this part for generations it has brought me and my family together and the memories that have been made and people met there can never be replaced please help us keep this park open for future generations to enjoy don't let the view of the few ruin traditions of the mini PLEASE HELP!!!"
bill barnes	Apple Valley, CA	2019-06-27	"I love being able to play with family and friends with our off road Toys . And camping as a group is so much fun . This is a perfect place to relax and play !"
Courtney Garcia	Lemoore, US	2019-06-27	"I have ridin there my entire life and it's not everybody else's fault for making stupid decisions"
branden hinkle	bakersfield, CA	2019-06-27	"We need more ohv areas, not less. I've enjoyed the dunes for years."
Erik Oyen	Santa Rosa, CA	2019-06-27	"please don't close pismo beach riding area. There is not enough OHV riding areas in California."
Tom Farrell	Lompoc, CA	2019-06-27	"We need to keep this available"

Name	Location	Date	Comment
Johnny Trevino	Salinas, CA	2019-06-27	"I've been going to pismo dunes since I was a little kid and now I'm taking my kids there teaching them how to ride it's a very fun place it needs to stay open with as much tourist that it brings in KEEP PISMO BEACH OPEN!!"
Christine Mousty	Hayward, CA	2019-06-27	"Christine Mousty"
Josh Lane	Tehachapi, CA	2019-06-27	"Because I love riding and love the dunes"
jason conrad	Clovis, CA	2019-06-27	"Because liberals suck"
Richard Lamb	Santa Rosa, CA	2019-06-27	"We need to keep places like this open for families to enjoy together."
Alexandria Baeza	US	2019-06-27	"Grew up out there so many fun memories and hopefully more to made let these families have fun enjoying what the love"
Mavis Perez	King City, CA	2019-06-27	"I love camping and riding there beautiful beach and dunes"
Tahona Ross	US	2019-06-27	"I grew up riding on the dunes. It is a great family vacation area. Please keep it open!"
John Smothers	Merced, CA	2019-06-27	"Taking away this family tradition is criminal"
Phil Manuel	Brentwood, CA	2019-06-27	"We camp there every year."
Ryan Burkett	Hanford, CA	2019-06-27	"Good family fun outside enjoy outdoors"
Joshua Morris	San Luis Obispo, CA	2019-06-27	"Those who want to shut it down dont even go there or are involved with anything there! So why should they be allowed to take this away from everyone else?"
Jennifer Van Cleave	Merced, CA	2019-06-27	"I'm signing because my family has celebrated Thanksgiving at the beach for as long as I can remember. It is a family tradition."
Sandy Darnell	Lemoore, CA	2019-06-27	"Love riding on the beach!"
Jessica Brackeen	Tulare, CA	2019-06-27	"This is the only place of its kind!"
Bonadea Meyer	Bakersfield, CA	2019-06-27	"My family has been coming here and riding every summer for 27 years! This is the only SRVA beach campground in CALI! Dont let "them" take away one of the most beautiful recreational arera's and ONLY beach for off roading in our state!"
Zack Lee	Porterville, US	2019-06-27	"Love it here we need it"
Kyle Jenkins	Baton Rouge, LA	2019-06-27	"After moving to California a couple years ago, I couldn't help but notice politicians taking a dump on everything that I enjoy. It's time for a change."
Branden Sherwood	Tehachapi, CA	2019-06-27	"The California government is garbage and taking away the rights of the people."
Dan Montgomery	Iometa, TX	2019-06-27	"Dones should be public"

Name	Location	Date	Comment
Jesse Villicana	Eagle, ID	2019-06-27	"For the buisness that will be affected from Paso Robles to Santa Maria"
Megan Annan	Clovis, CA	2019-06-27	"This is one of my favorite spots to visit and camp."
Chuck Oliver	Bakersfield, CA	2019-06-27	"I grew up camping and riding the Oceano Dunes and have what it be closed off more and more over the past 40 years and the dunes are the one reason me and my family go to Pismo /Oceano dunes for the love of riding the beauty of riding over the dunes with the ocean as a background the group night rides of playing follow the leader to walking the beach the next morning with a cup of coffee and your loved one looking for sea shells the list goes on and on"
don stone	santa maria, CA	2019-06-27	"These people moved here and have done nothing but complain and lie about there reasons for closing the beach to ohv use. They started with the santa maria river bed then oso flaco and they have no true information about the dust. When you move somewhere and try to change without any care for anyone else who was here long before you that makes it political biased and they will do anything to win to suit there needs. If it doesn't fit there wants n needs then they can move away and leave us alone."
Kimberly Hernandez	Porterville, CA	2019-06-27	"It's a public area. So keep it open to the public."
Kevin Cole	Vista, CA	2019-06-27	"Fuck uptight and overreaching legislators.Let freedom braap !!!"
Michelle Joseph	La Habra, CA	2019-06-27	"I hope they plan on a lot of closed businesses, vacant homes, vacant apartments and lots of homeless unemployed people. So sad it's come to this."
Lora Mallory	Vancouver, WA	2019-06-27	"I love this place! Do not close it!"
Martin Gonzales	Modesto, CA	2019-06-27	"Martin J Gonzales"
Ruth King	Wilder, ID	2019-06-27	"Keep it open just like it is. It's the best!"
Lil Wayne	Riverdale, US	2019-06-27	"I just wanna keeo sending it with the boys"
Tawnie Lucero	US	2019-06-27	"Its fun to be out there"
Travis Richardson	Fresno, US	2019-06-27	"Stop taking out ohv money and misusing it and closing parks"
April McGuirt	Fresno, CA	2019-06-27	"I want this to stay open!!! Don't rob us of our family traditions:("
Lucas Langworthy	Bakersfield, CA	2019-06-27	"It's the dunes so many memories here with family and friends"
Michelle Talley	Clovis, CA	2019-06-27	"Many of our family memories have been made at the dunes. ##"
James Hunter	Malibu, US	2019-06-27	"I"
Jacob Bauer	Reedley, CA	2019-06-27	"Fuck government regulation"
Sally Helm	Kelseyville, CA	2019-06-27	"We need fun family places like these to stay open!"

Name	Location	Date	Comment
Andrea Charlie	Porterville, CA	2019-06-27	"We. Love that place"
Ray Correa	Orange City, FL	2019-06-27	"For future generations to enjoy!"
Sean Stegmann	Lucerne Valley, CA	2019-06-27	"I'm tired of the socialists state"
Md Gief	Exeter, CA	2019-06-27	"Our parks and recreational areas need to be left open for public use. Stop closing our parks, trails, beaches, mountains. They are for the public. Not special interest groups to control."
Leran yosef	Woodland Hills, CA	2019-06-27	"I've been going here since a kid, myself and my entire camp group appreciate and respect the Pismo dunes. Based on the article I read, is not a legit reason to close down Pismo for OHV. That city will crumble quickly without the financial support of campers/visitors"
Michael Anderson	Pomona, CA	2019-06-27	"We need to preserve some of the fun things in California."
adrian Zamora	madera, CA	2019-06-27	"I wanna keep oceano dunes open."
Casey Cunningham	Santa rosa, CA	2019-06-27	"The Dunes should stay open"
Richard Williamson	Richmond, CA	2019-06-27	"We need off road parks for off road vehiclesduh!"
Brisa Ramirez	Los Angeles, CA	2019-06-27	"I believe they should keep the dunes open for Californians to enjoy like they have been all these years it would be sad to see such a staple close and also not just the visitors but for the locals that depend their livelihood on the buisness they get from the attraction of the dunes"
Justin Walker	Portland, US	2019-06-27	"So many great memories"
Daryl Poulsen	New Zealand	2019-06-27	"Daryl Poulsen"
Allison Arnold	Winchester, US	2019-06-27	"Too all the wonderful memories here!"
Thom Dooher	Cathedral City, CA	2019-06-27	"It's a fantastic place for families to bond. Keep it open!"
Efren Fraile	Nipomo, CA	2019-06-27	"its a local spot not just holidays when the out of towners trash it"
Anthony Lomonaco	Tulare, CA	2019-06-27	"This is complete bull shit."
Joseph Haney	Fresno, CA	2019-06-27	"Oceano is such a great place to camp and ride"
Alicia Marzette	Sacramento, US	2019-06-27	"My family has been going to pismo for 25 years and it's a family tradition that we are passing along to our kids and grandkids we teach them about the ocean life besides riding quads and also about cleaning up our surroundings and leaving it better than we came to!"
Sean Woodruff	Templeton, CA	2019-06-27	"Closing the dunes would kill most if not all of the businesses that rely on the tourism and people that come to use it for recreational activities."
Charles Roesch	Chatsworth, CA	2019-06-27	"Cuz America is the land of the free!"

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CJ Braun	Los Angeles, US	2019-06-27	"I love oceans dunes SVRA"
Damon Feery	Turlock, CA	2019-06-27	"I signed because I've never been and want to wen I finally get my rides finished"
John Farrow	Tucson, AZ	2019-06-27	"The Dunes aren't for Bafoons! It's a beautiful place, that should be respectfully & responsibly enjoyed by everyone for generations to come! Not just with big crazy orgies & quad feats that make even the most battle hardened BRAP BRAP Master achieve wood!! But for the average Joe who just wants to have a great time in & within nature! I am a 13th level Kung Fu Master & have spent decades meditating in the dunes to achieve enlightenment & the 7 Chakras of the body & the 11th Chakra of the Nether Region in harmony with the dunes & the universe! So please not only sign this petition but donate 5\$-5,000,000\$ because every dollar counts! You need the dunes, & MOST IMPORTANTLY THE DUNES NEEDS YOU!! Give the dunes a voice! Don't be an environmental poser, please stand up, & help the dunes which cannot help itself!! NAMASTE ALL DAY, ERRY DAY!! Don't forget "DUNES UP, STRIP MALLS DOWN!! SUPPORT YOUR LOCAL LOCALS, & BUY ORGANIC HONEY, IT CAN HELP PREVENT CHAIN STORE HONEY IN YOUR LOCAL WHOLE FOODS TYPE STOR"
Tim Avila	Porterville, CA	2019-06-27	"I love going camping out there"
Kenneth Underwood	Coalinga, CA	2019-06-27	"I believe the people should be allowed to access all public lands with all freedoms"
Julianne Sweatt	Santa Barbara, CA	2019-06-27	"Love Pismo!!! Keep it alive!!!"
Bill McKeighen	Clovis, CA	2019-06-27	"The tree hugger's and bird watcher's take, take, take. When is enough, enough? Our children have enough birds to watch how about a place for them to ride?"
christian Flaming	Sanger, CA	2019-06-27	"Pismo is a great place to ride"
Cynthia Gonzalez	US	2019-06-27	"I love going out there with my family so many memories from previous years and met people from across the country and other countries there witch is a great thing for pismo and other towns around it means money is coming in from visitors"
Christopher McIntosh	Santa Cruz, CA	2019-06-27	"I had a blast out there years ago riding wheelers. It's a beautiful place to recreate. I never saw trash so it was clear that people respected the region. By illuminating outdoor recreational areas such as this just increases the probability the kids will choose to sit inside, get fat and play video games. Or maybe they'll decide to stand on the street corn and sell drugs instead. Are the Oceana Dunes the cure for all of that? Certainly not. But, it's one hell of a wonderful opportunity to go outside and enjoy mother nature in all her glory."
Christopher McIntosh	Santa Cruz, CA	2019-06-27	"Tried to correct the grammar but it wouldn't allow me. Plz blame Siri and not me. :)"
Christina Clark	Los Banos, CA	2019-06-27	"I want my children to be able to enjoy Oceano dunes with their children. Not to mention, why are we paying allOf these extravagant

Name	Location	Date	Comment
			fees if our rights/privileges keep getting taken away? We are taxpayers! This is a STATE PARK, that WE taxpayers pay for. KEEP OCEANO State Park OPEN!!!!"
Amber Shaver	Vancouver, US	2019-06-27	"We have so many memories here and plans to come ride in the future as we fell in love with Pismo the first time we visited and rode the dunes. It was our first time riding in our first RZR. Please keep it open for our grandkids and their kids and so on! It is such a beautiful place to visit and enjoy:)"
Jason Farrell	Bakersfield, CA	2019-06-27	"This is one of California's somewhat hidden gem that people can still go to and experience. There's not a lot of costal places that have dunes where you can have the opportunity to take you family out and have fun. That town will lose alot of business also. It's just down right stupid."
Christopher Peckham	ARROYO GRANDE, CA	2019-06-27	"This is the California tax payers land that we pay to use. It is our right to be able to go there. Especially as local residents"
Hunter Martin	Tulare, CA	2019-06-27	"I just bought my dirtbike by myself at 18 years old and I haven't gone riding since I was 8, and the first place I wanted to go was the dunes and now they're going to close the place where my family has made so many memories. The dunes is a place of happiness and escape from the worlds stress and where we can have the most exhilarating fun. Plus so many people make their livings on the dunes like Atv rental places and rangers. This place is too amazing to close."
Oscar Zamora	Clovis, US	2019-06-27	"Don't let it die!! Pismo is a blast where family gets closer"
Lanette Smeltzer	La Pine, OR	2019-06-27	"Signing this for the same reasons I'm against HB 2007 & HB2020"
Michael Murray	Anaheim, CA	2019-06-27	"The dunes are great places for family and friends and I don't care if some obscure nesting bird that no one has heard of and doesn't matter has to go somewhere else. Dunes are for riding, camping, family, friends and fun."
George Meier II	Santa Paula, CA	2019-06-27	"I grew up camping in Oceano!"
Zack Long	Alhambra, CA	2019-06-27	"This place must stay open. Riders love this place and many people have learned how to ride here. Take it away won't do anything but hurt people."
Austin Levindofske	Redding, CA	2019-06-27	"We need to keep places like this open"
Herb Gordon	Valley Ford, US	2019-06-27	"It's not just Oceano!"
Jesse H	Chicago, IL	2019-06-27	"I've been out here before, one of the few reasons I'd ever go to California."
Jason Randell	Red Bank, NJ	2019-06-27	"People all over are losing there trails. It's sad. Growing up in the spot you loved so much, just get shut down. Soon enough there is going to be no where to ride. People who love the sport like we do , what will we turn to now."

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Rhonda Johnson	Porterville, CA	2019-06-27	"Rhondajane Ross"
Solese Miller	Hesperia, US	2019-06-27	"A great childhood memory for me, keep it open so that I may make those same kind of memories with my kids."
McKnight Jeffrey	Ridgecrest, CA	2019-06-27	"I have been going to the dunes for decades with my family and I don't want that to end, please keep my dunes open so we can enjoy them for years to come."
Robert Miller	Shafter, CA	2019-06-27	"We love the dunes"
Manuel Garcia	Palmdale, CA	2019-06-27	"Beleive"
Eryn Burrows	Aromas, CA	2019-06-27	"We've been coming to Oceano dunes since the early 70's. The only area in California where people can drive on the beach, and the busiest park in the state. Don't close Pismo!!"
Ryan Diaz	US	2019-06-27	"I grew up going to the Oceano Dunes. While I no longer live on the west coast, I would love to be able to go back someday and enjoy it as I once did!"
Justin Garcia	Oakhurst, CA	2019-06-27	"Because I like camping"
Renee Smith	Makawao, HI	2019-06-27	"I am from there and enough control! Great times and great memories!! Lighten up"
Brenda Turner	US	2019-06-27	"Because this is a wonderful place for families to enjoy."
Nick Sawyers	Los Angeles, CA	2019-06-27	"California is killing all the freedoms that make it cool"
Jeanine Cain	Madera, CA	2019-06-27	"Love the dunes! We spent quite a lot of time at the dunes when my sons were growing up and now they take their children. Great family times! Please don't take the dunes away from my grand children."
Jerrell Manuel	Elmendorf Afb, AK	2019-06-27	"It's what I believe is right"
Vanessa Moreno	US	2019-06-27	"It's a way to keep my kids from tablets and phones"
Jordan Hornlein	Oceano, US	2019-06-27	"Love the dunes my kids are growing up going on the beach."
Shauna Mayes	Bakersfield, CA	2019-06-27	"Please don't shut this down"
Aleksey Astapenko	San Jose, CA	2019-06-27	"I love pismo, visit it many times a year with friends and kids. It has to remain open!"
Mark Owings	Modesto, CA	2019-06-27	"Support"
selena neira	Bakersfield, CA	2019-06-27	"This place is were ALL families gets together and makes memories. Also just to get away to relax and hear the ocean and walk by it to enjoy it with your kids"
Juan Rojano	Bradenton, FL	2019-06-27	"I've been riding quads there since I was a little kid. I want to some day be able to take my own family one day to ride"

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Chris Gunter	Spokane, US	2019-06-27	"I believe in this cause. I love Riding at Pismo and have been going there for 15 years."
Dakin Nishimoto-Lott	Clovis, CA	2019-06-27	"My family enjoys the 4x4 and camping please dint take our summer tradition awayv"
John Adauto	Anchorage, AK	2019-06-27	"I live on the central coast and it's always been amazing to be able to have a unique recreational area to do cool things with your family. It would be horrible to see such a thing ripped away from the central coast"
Tom Dages	Campbell, CA	2019-06-27	"Love going camping there with the family!"
Sean Lawlor	Fullerton, CA	2019-06-27	"Joey says so"
Thomas Gratny	Dublin, CA	2019-06-27	"I'm signing because my family enjoys being out there on the beach it's an annual trip for New Year's and other events. Taking away the ability to have such great quality family time is ridiculous"
Serena Lynn	Hanford, US	2019-06-27	"My family has been going to the dunes for years & I wish to take me own family when I grow up."
Christopher Muse	Fort RIley, KS	2019-06-27	"It's important."
Rhonda Adcox	Modesto, US	2019-06-27	"The beaches are for the public keep them that way !!!"
Vanessa Salas	Santa Maria, US	2019-06-27	"The dunes is one of my life long favorite places to be. I have created many memories with my friends and family and one day I hope my kids get to experience and create memories like mine. It's a beautiful place and something unique about the central coast, even many people from far out city's come and experience!"
Daniel Weimer	Clovis, CA	2019-06-27	"This is bullshit"
Nicole Nunn	Cottage Grove, OR	2019-06-27	"Keep"
Joshua Britton	Kingsburg, CA	2019-06-27	"Fix California, vote everyone out of office."
Cindy Bynum	Shafter, CA	2019-06-27	"Need to keep them open"
Beverly Morris	Wichita, KS	2019-06-27	"I am helping a friend. Please don't close the dunes because they need a place to go for recreation and entertainment."
Ryan Bogle	US	2019-06-27	"Grew up in the dunes!!"
Debbie Kleinfelder	Salida, CA	2019-06-27	"I believe this unique space should remain open for all to enjoy."
Steven Hembree	Avenal, CA	2019-06-27	"I believe wildlife and people can share this vast resource and can be controlled in such a manner that will benefit all concerned. Keep the dunes open!"
Juan Gamez	Norwalk, CA	2019-06-27	"Off highway areas shouldn't be restricted or taken away."

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Sharon Gaertner	Summerfield, FL	2019-06-27	"Because I Love The Dune's and I I Don't Believe Government is Over God's Creations and The Economic Inpact One Surrounding Community's"
Darlene Smith	Sussex, NJ	2019-06-27	"We need to protect our environments"
J Rodriguez	Warminster, US	2019-06-27	"Not from the area but here in PA we are limited to ride especially since all the trails in nj are off limits for ATV only enduro and jeeps are allowed wish we did something about it so many great places"
James Houze	Clovis, CA	2019-06-27	"This park and area is a staple to what makes California's tourism. Whenever my friends from out of state ask what they should do. I always tell them go to the dunes at pismo to ride. It's the best time of your life. Closing it will not only affect the economy of the local area but also California's tourism in general"
Taylor Harrison	Lompoc, CA	2019-06-27	"This place can't shut down! So many memories from here. Some good some bad. This place has so much history."
Michael Davis	Palmdale, CA	2019-06-27	"More and more places are needed to ride, the motorcycle industry is suffering from lack of terrain as is"
Tyler Lobao	Oakland, CA	2019-06-27	"I've gone to the dunes when I was younger. A ton of fun and great memories. Please don't shut it down."
Dina Hershberger	madera, CA	2019-06-27	"We love the camping and ability to drive on the ."
Jakob Shimp	Carnegie, PA	2019-06-27	"It's great for social events!"
Rick Buckley	Phelan, CA	2019-06-27	"I use Pismo dunes and have since a child. I want my children to have the same right."
Owen Adams	Apache Junction, AZ	2019-06-27	"Owen adms"
Lia Coulombe	Santa Clarita, CA	2019-06-27	"Enjoy everyone being able to use our parks and lands"
Nickie Mullins Morris	US	2019-06-27	"Nickie mullins morris"
Samantha Bingaman	Stockton, CA	2019-06-27	"Samantha Bingaman"
Angela Wallace	Cody, WY	2019-06-27	"I am from California and I loved camping on beach."
Monica Campbell	US	2019-06-27	"Because I love to ride. And this is a great place to so it. Don't take everything away"
Ken Thompson	Port Charlotte, US	2019-06-27	"I grew up there and it is Iconic for the Central Coast. A huge area for people to spend camping on Long weekends"
Jeff Crooks	Murrieta, CA	2019-06-27	"I ride and it would be a shame to lose the only public place in California we can legally ride on a beach."
William Bishop	Tampa, FL	2019-06-27	"My Buddy, Shawn, asked me to."

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Steve Alexander	Portland, US	2019-06-27	"damn liberals always want to ruin our fun!! Make America Great again!!"
Nick Banks	Midland, TX	2019-06-27	"I grew up on this beach and when I do come home to visit this is my favorite thing to do. Also the 5 cities community is based around the level of people the dunes brings. A lot of local shops would fail without the income these dimes generate."
Brandon Lupo	San dirgo, CA	2019-06-27	"I love oceano dunes"
Baily Pamplona	Tulare, CA	2019-06-27	"Because fuck you that's why"
Markie Marcs	Lakeland, FL	2019-06-27	"Boi just trying to brahpppp and pop some sick wheelies dude HELL YA BROTHER"
Samantha jones	Bakersfield, CA	2019-06-27	"Every kid loves riding on the dunes!####"
Dawn Herrera	Arroyo Grande, CA	2019-06-27	"I lived by Oceano Dunes."
Jorge Sereano	Los Angeles, CA	2019-06-27	"Lots of.people enjoy the open instead of the big city"
Kirklin Stanfill	Fort Smith, AR	2019-06-27	"Love that place went there since a kid"
Eric Munro	Santa Maria, US	2019-06-27	"I learned to ride a dirtbike here and we've been camping out there for years. I can't imagine how much money will be lost by closing this park down. I find it extremely selfish to close this off or limit it any farther. Sand highway used to run all the way to Guadalupe. The fact that people want to shut it all down is just downright upsetting."
Doug Jenkins	Huntington Beach, CA	2019-06-27	"I love pismo"
Andrew Haaf	Petaluma, CA	2019-06-27	"I love going to these dunes been going since I was a kid and hope to bring my kids some day"
Lance Gunlund	Fresno, CA	2019-06-27	"Lance Gunlund"
Jon Bimat	Tulare, CA	2019-06-27	"I'm in, keep the recreation park open."
Saul Hernandez	Simi Valley, CA	2019-06-27	"It's a great place for our offroad community to get together and enjoy time together. ��"
Jose Ayala	Santa Maria, CA	2019-06-27	"Reason for sigining want to keep the dunes open"
david terry	Morgan Hill, CA	2019-06-27	"I want my.son to be able to enjoy Pismo for years to come he is only 8 months old and if this goes through he will never experience it"
Tyson Furubotten	Santa Clarita, CA	2019-06-27	"The dunes has been a place of family memories and camping for 40 years. Please don't take away such a great place for people to enjoy with their families."

Name	Location	Date	Comment
Dave Luehrs	Danville, CA	2019-06-27	"Keep access open to all users— OHV enthusiasts need well-managed parks to protect our future for generations to come. Thank you."
Michael Staublein	Bakersfield, CA	2019-06-27	"I use this beach yearlyspend money on taxes for it and spend money in its surrounding communities numerous times a year because of it"
Dayana Alvarez	Modesto, CA	2019-06-27	"My family and i love traveling to pismo we have a good time and my daughters love to play in the sand we want the dunes open"
Sherri Elkins	Sacramento, CA	2019-06-27	"I love going there"
Dawn Waddell	Taft, CA	2019-06-27	"This is a favorite tourist area and always has been."
Deni Webb	Bakersfield, CA	2019-06-27	"We enjoy riding and camping st the dunes. Closing the dunes would be a huge financial loss for surrounding businesses and its city"
Tom Neves	Modesto, CA	2019-06-27	"Help save this great place go ride and have fun with family and friends"
Raven Wischemann	Grover Beach, US	2019-06-27	"This is our home this is our playground , the locals shouldnt be affected by all the inconsiderate people who come and leave trash, and cause problems . Do not punish us , quit letting people who dont live here ruin it for us locals"
Doug Hansen	Hemet, CA	2019-06-27	"Keep it open, the land belongs to the PEOPLE!"
Josh Suchovsky	Lancaster, CA	2019-06-27	"I am an avid rider and it is a place where we can all meet up and have a good time it's a year round place to be able to ride and it is our right to be able to ride and taking it away would be devastating to everyone"
Rodney Armstrong	California	2019-06-27	"Been going one a year since 2005. How can one, partially un-elected group, have so much power that their decisions go to the Supreme Court to get overturned? Don't take your eye off of them. The real agenda IS to close the beach permanently, the method is to scare everyone of closing it now, then backing off and taking another chunk of OHV area. We OHVer's feel good that they kept it open we loose track of how many time they take chunks of usage areas. This time we settle for for zero reduction of OHV usage and demand implementation of the Park plan to create a southern entrance."
Gloria Bridges	Visalia, CA	2019-06-27	"Camping on the dunes is a great family get away and it needs to stay open!"
Rebecca Gray	Saint Paul, MN	2019-06-27	"These people are my friends."
Tracy Bales-Newton	Sanger, CA	2019-06-27	"This has been a vacation destination for me since 1978 Please don't take one of the only off roading in Ca away!"
Darren Perina	Brentwood, CA	2019-06-27	"Because wacko environmentalists are ruining this state."

Name	Location	Date	Comment
Chris Gage	Campbell, CA	2019-06-27	"Shutting down access is not a solution."
dori woodworth	Salinas, CA	2019-06-27	"I've spent many days and night there and always have a great time. Its good clean family fun that everyone can take part in."
Vincent Sullivan	Fresno, CA	2019-06-27	"My family lives this place . I hope to take my son riding there someday"
Peter Harkins	San Jose, CA	2019-06-27	"Where I first learned to ride a motorcycle with family and friends"
Heather Blackmore	Redondo Beach, CA	2019-06-27	"I lived in Oceano for many years and had some of the best times there. Besides that, it brings in lots of \$ for the community."
Anthony Trigueiro	Sacramento, US	2019-06-27	" I've been going to the dunes since I was three and you guys have done nothing but destroy a perfect place for people to have a good time If you take all these places away what else do we have to do Make America free again"
Nick esparza	Gilbert, US	2019-06-27	"Fuck california"
Carla Parker	Costa Mesa, CA	2019-06-27	"I want my grandkids to have the experience of riding on the beach."
Jennifer Andrews	Stigler, OK	2019-06-27	"For over 20 +years my family went and spent alot of time at pismo. Camping and riding it's in our blood. My grandson goes now with his greatgrandparents. Pismo will be a ghost town if they shutdown the dunes"
Sharron Williamson	Arroyo Grande, CA	2019-06-27	"I live by the dunesthis will ruin this little town"
Kenneth Wills	Oakley, CA	2019-06-27	"We need these spots left open"
pamela bagnoni	Erie, PA	2019-06-27	"It's only the right thing to do!"
Garrett Church	Oak hills, CA	2019-06-27	"I love riding and camping out there and don't want it shut down"
Elizabeth Gonzalez	Soledad, CA	2019-06-27	"Pismo is a great family place that I like to go to."
William Garrett	Wahiawa, US	2019-06-27	" I have friends who go there every year"
Nora Preece	Farmington, NM	2019-06-27	"we need to keep places like this open so people can get away and relax. I've gone camping there. It was an enjoyable experience."
Janelle Birdwell	Bakersfield, CA	2019-06-27	"This is one of our favorite spots to visit. We visit several times a year."
Aurelio Cueva	Castroville, CA	2019-06-27	"I'm signing this because I love riding in pismo dunes."
Vicki Richardson	Lexington, KY	2019-06-27	"Families need these activities!"
Mark Anderson	Wasco, CA	2019-06-27	"I'm signing this petition because the Pismo dunes are a one of a kind destination for many people all over southern/central California. Many of us have been going there since we were kids with our families, and our parents with there families!"

Name	Location	Date	Comment
Belinda Gomez	Arroyo Grande, CA	2019-06-27	"I grew up here since the 70's and raised my kids in these dunes. They are are aware of safety. These morons that come from out of town and don't know the laws of nature are what are ruining it for us locals."
Johnny Homen	Stockton, CA	2019-06-27	"Johnny Homen"
Robert interdependent Gstes	Chino, CA	2019-06-27	"I've grown up visiting those dunes and beaches and I plan on doing the same with my children."
Maureen Karr	Boise, ID	2019-06-27	"Tired of a small group of people who don't like our sport ruining our riding areas. We pay taxes too we have rights! It's time to stop these self righteous people from taking away all of our rights!!  Riding in the sand hurts nothing!!!"
Amanda Brinkley	US	2019-06-27	"We love going to the dunes to spend time with family and friends!!!"
Jessica Clark	Springfield, MN	2019-06-27	"I grew up in California and the sand highway is something I will never forget."
Lori Rohrer	Park Hills, MO	2019-06-27	"Lori Rohrer Leave the parks alone !"
Don McBride	Ravensdale, WA	2019-06-27	"We need to keep all our riding areas open so that kids can enjoy the same things many of us did. If we close these areas. You will force kids out of riding or to break the law. Give the people legal places to enjoy nature with their families."
Meghan Erks	Oakley, CA	2019-06-27	"We as a family have had some amazing times there and never had the sort of problems. This is very sad!"
Victoria Bartow	Redding, US	2019-06-27	"Victoria Bartow"
Matt Staab	Elk Grove, CA	2019-06-27	"Family's needs a place to go for motorsport fun"
Kathryn Watson	Menifee, CA	2019-06-27	"My kids love riding here. Favorite weekend family getaway."
George Martinez	US	2019-06-27	"Leave it open."
John Voeltz	Los Angeles, CA	2019-06-27	"John"
Sonya Bishop	Taft, CA	2019-06-27	"My earliest memory of Oceano Dunes was 45 years ago when I was 6 or 7. My whole family would spend a week camping in the dunes. Dune buggy's and sand toys all week long. Those are the best summer memories. I continue this tradition now as do so many families. Closing the dunes or canceling ohv use is not the answer. Restricting the number of entrance and use would be a starting point. So many are allowed in right now that you feel like a sardine in a can at times. Lower the number of campers and the day use and you will see less ohv use. Taking away the ability to use the dunes will be taking away money from local businesses. It will end up hurting more than just the people who stay in the dunes."
diane riccio	Las Vegas, NV	2019-06-27	"Diane S Ricciopeople need a place to ride and have fun"

Name	Location	Date	Comment
kenneth pishek	paradise, CA	2019-06-27	"Kenneth Pishek"
Robert Long	Henderson, NV	2019-06-27	"The land is for everyone to enjoy. Not a select few"
Jedediah Gilman	Lapine, OR	2019-06-27	"I have sign a petition years ago to save the dunes and I am doing it agane we love the dunes and I feel outher do as well"
Brandon Heatherly	Visalia, CA	2019-06-27	"I grew up ridding there. They've closed enough of it down. Would be very beneficial to keep it open for the community stores and gas stations"
Geoff Bell	Mission Viejo, CA	2019-06-27	"Bell"
Tyler Birkenholz	Dubuque, IA	2019-06-27	"Rob is my friend and deeply passionate about this."
Vonnie Gesinske	Sadieville, KY	2019-06-27	"I am signing the pett"
Neil Flanders	Loyalton, CA	2019-06-27	"I'm tired of ohv areas being shut down. It's a fun place to go"
James Durbin	Bakersfield, CA	2019-06-27	"Too many politicians taking away American freedoms"
Nereida Rivera	Spring Hill, FL	2019-06-27	"Nereida Rivera"
Peter Bilicki	Brentwood, CA	2019-06-27	"California sucks!"
Daniel Johnson	US	2019-06-27	"the dunes need to be open for all to enjoy."
Diane Gawatz	Sand Springs, OK	2019-06-27	"Memories for family and friends are made every year. I understand rules may need to be inforced but not take away the whole famouse park."
Brian Allen	Bakersfield, CA	2019-06-27	"I'm sick and tired of the government taking away more land of ours that belongs to the American tax paying citizen"
Gary Shick	San Luis Obispo, CA	2019-06-27	"Closing the Oceano Dunes is totally unnessary"
Don Amador	Oakley, CA	2019-06-27	"The effort by California Coastal Commission staff and their allies to permanently close Oceano Dunes SVRA to OHV use would limit legal motorized recreation on California's 1,100 mile coastline to just 300 acres at the BLM Samoa Dunes Recreation Area near Eureka. Not an acceptable outcome."
Lindsey Bila	Broomfield, CO	2019-06-27	"I support all recreation should be open to all."
Josh McCormick	Tehachapi, CA	2019-06-27	"It's a historic riding area that brings revenue to pismo and the surrounding areas. Closing it will only hurt businesses and the community."
rebecca webb	Modesto, CA	2019-06-27	"Pismo beach is a great place and very enjoyable."
Jesus Hernandez	Beverly Hills, US	2019-06-27	"This is what brings people together."

Name	Location	Date	Comment
Enrique Olivas	Oakland, CA	2019-06-27	"My family and I enjoy going to pismo and camping on the beach and riding quads and dirt bike"
Matt Frederick	Irvine, CA	2019-06-27	"Have enjoyed the dunes for years, the only place like it for camping in CA. Closure isn't management."
Laquita Wilson	Yorba Linda, CA	2019-06-27	"Family loves off road bikes"
Bonnie Cogburn	El Dorado, AR	2019-06-27	"The Government has continued to take what belongs to the people while lining their own pockets"
Jared Obrien	Highland, US	2019-06-27	"I love these dunes"
Richard Davis	Santa Clarita, CA	2019-06-27	"This land belongs to the people, not the government. Any govt regulation to remove the citizenry from the use of land is unconstitutional."
TRAVIS HUCKABY	Patterson, CA	2019-06-27	"Oceanic Dunes brings people from All over Closing the Dunes will hurt the cities source of income drastically!"
Brandt Munson	apple valley, CA	2019-06-27	"This is our land and it belongs to the people. Not the greedy politicians."
Tyler Wytt	Denver, CO	2019-06-27	"Beautiful place. Deserves to be free"
Joanna Harris	Oakdale, CA	2019-06-27	"Many fun memories here and many more to come"
Michael Wied	Santa Maria, CA	2019-06-27	"Its one of the last places on the coast where a family can go and have a good time."
Terry Shifflet	Corona, CA	2019-06-27	"We need our riding areas and it brings big money to local economies"
caprina Lange	Porterville, CA	2019-06-27	"Families have been going out every summer and having a great time together while making great memories. There is not much for kids to do these days and having fun at the dunes with their family is something that they have a great time doing and are very happy during their summer break ."
Juan Barrios	Los Angeles, US	2019-06-27	"I love the dunes place"
Karen Harmon	Riverside, CA	2019-06-27	"Beautiful Place. Keep the Dunes open. Good for local revenue."
Richard Leivas	Needles, CA	2019-06-27	"Shutting it down is BS"
Colton Vernon	Emporia, KS	2019-06-27	"I grew up in California. Lived in that state for 17 years. People well good people don't destroy the property and pick up after themselves. It was such fun."
Blythe Debruin	Olympia, WA	2019-06-27	"It should be open for us!!"
Thomas Brant	Murrieta, CA	2019-06-27	"It's a way of life! Close it down for what??? Because of air pollution? Why don't you pick up all that trash in the ocean first!"

Name	Location	Date	Comment
Laura Birdsell	US	2019-06-27	"California needs to stop taking everything away from Californians!"
Pamela Macias	Santa Maria, CA	2019-06-27	"Save our beach"
Matthew Carroll	US	2019-06-27	"This is getting out of hand all the environment extremists"
Chris Mock	Rancho Cucamonga, CA	2019-06-27	"I am signing because I believe there can be a responsible balanced use of the land and it includes leaving the riding area open to the public. I have spent many days riding the Pistons sand dunes with my family and they are great memories I cherish. This riding area must be kept open."
Evelyn Bennett	Stockton, CA	2019-06-27	"How can you take away something so many families have enjoyed for generations? It's no wonder California is going to hell in a hand basket. You take away everything that allows good clean family fun!"
Francisco Gonzalez	San pablo, US	2019-06-27	"I been riding in the dunes since 2002, this is all I do for a hobby besides work.I spend thousands of dollars a year to do so. I think we owe it to our future generations to enjoy the oceano dunes as I did, creating memories that will never be forgotten. Every Friend that I took to the dunes that has never experienced it, immediate went out an bought there owe sand toy atv, dirt bike, or sand rail. Duning is a magical thing if you never done it."
Darryl Skelton	Pasadena, CA	2019-06-27	"Use my Green sticker money and my camping fees and build a bridge or a new entrance South of the stream"
Joe Kroninger	A.G., US	2019-06-27	"The Oceano Dunes are part of my life,my best friends are out there my best times are out there . We must stand up and fight the government and special interests to keep the dunes open!"
Anisha Camacho	Hollister, CA	2019-06-27	"Don't take away a fun place to take your family"
Jeremy Poston	La Verkin, UT	2019-06-27	"Stop closing open recreation areas."
Michael Lombardi	San Jose, CA	2019-06-27	"Lots of good memories here. Need to keep it open for future generations."
Dave Edmiston	Valencia, CA	2019-06-27	"Please protect our access to these public lands."
Margarita Luna	Santa Ana, CA	2019-06-27	"The dunes need to be kept as open space for the public"
Jennifer Morrow	Merced, CA	2019-06-27	"We have a right to have access to Oceano. It is a tradition for our family. Many families would be without an affordable place to camp at the ocean if this area is closed. There is a huge California coast that no one can drive on. Please do not take away something that brings great joy to a lot of people."
Jacob Ward	Ceres, CA	2019-06-27	"Im signing cuz pismo is one of the best places to ride amd camp. I love it so much im there almost every week"
Anthony Gaspar	Santa Clara, CA	2019-06-27	"Keep it open my family has been coming here for 50 years!!!! Always brings joy and happiness when we drive on this beach"

Name	Location	Date	Comment
Darren Wilson	Fresno, CA	2019-06-27	"My family and I get together and camp on the dunes a couple times a year. We've"
Annette Gonzalez	Corpus Christi, US	2019-06-27	"As a kid I have the best memories on the dunes. Keep them open"
Chase Melton	Denver, CO	2019-06-27	"I grew up in Cali riding the dunes. Great family time camping and riding."
Richard Kerri	San Ramon, CA	2019-06-27	"Need to keep this open for multi use"
Tony Madrigal	Downey, CA	2019-06-27	"Tony Madrigal"
Jeanna Ashford	Lake Havasu City, AZ	2019-06-27	"I'm an avid off road enthusiast and taking these dunes away is wrong!"
Shannon McGinley	Los Altos, CA	2019-06-27	"The dunes are rare and should be available for the public to enjoy"
Brenda Bolls	Fresno, CA	2019-06-27	"My family visits Pismo Dunes at least 5 times a year. We create unforgettable memories with our children and our fellow families that we camp with, that have become family. We eat every meal together, we play in the dunes, with every car full of each others children, together and we gather around the campfire every night together! With all of our daily busy lives, Pismo is a place we reconnect with our kids, our family, and our friends that have become family, creating unforgettable memories. It would be a terrible shame if the government took that away from our children and our families."
chelsey jerner	Atwater, CA	2019-06-27	"So many great memories made here-don't close!!!"
Santiago A Pizarro III	Fresno, CA	2019-06-27	"This Is getting beyond out of hand. The dunes have been a part of growing up in California for generations. Stop with the constant bans!"
April Shelton	Pismo Beach, CA	2019-06-27	"I don't think things should change I think riding courses should be mandatory. It's the one thing that makes the coast different from everybody else it's the only Beach in California you can legally drive on and that's why some people bought their homes there"
Teresa Contreras	Los Angeles, CA	2019-06-27	"This is a great opportunity for my family to come together for family time and ride."
Gerald Roubos	Valley Springs, CA	2019-06-27	"Government overreach"
Jared Allen	Walnut Creek, CA	2019-06-27	"Fuck tree huggers! Braaaaaaap!!!"
Amber Johnson	San Luis Obispo, CA	2019-06-27	"Shutting down the dunes, closing diabloour community and economy will struggle to the point of breaking and there are people who do or care. It's got to stop! Save the dunes, save the 5 Cities!"
Maria Hernandez	Los Banos, CA	2019-06-27	"Just trying to keep it open."
Donna White	Marysville, CA	2019-06-27	"Donna White"

Name	Location	Date	Comment
Tierney Flint	US	2019-06-27	"Вгааааррррр"
Kelly Kennedy	Santa Paula, CA	2019-06-27	"I feel it's important to have recreational areas for adults and kids to go and have fun together."
Amy Burbidge	Fresno, CA	2019-06-27	"I feel that it is imperative that we keep these public recreation areas open! Our country needs more opportunity to be outdoors and exercise more, not less. Keep public lands open!"
Adolfo Delcid	Los Angeles, CA	2019-06-27	"When my mother was in the final stages of liver failure, I was able to drive her onto the beach so she could see the water, thankfully she received a transplant and survived if not for oceano she wouldn't have been able to see the ocean"
Darlene Ragan	Fresno, CA	2019-06-27	"You are not only trying to take away family fun, but our right to the beach. It will cost over 3,000 jobs, major decline in revenues not to mention the businesses it will affect. The snowy plover is an excuse, not a reason."
Nancy Triana	Bakersfield, CA	2019-06-27	"This is were we vacation and our family tradition would be over!"
Jill Epperson	El Dorado Hills, CA	2019-06-27	"Keep the dunes open! Because its a great way for families and friends to get together and have fun. We actually need more places like this. Kerping our younger children involved in these kinds of sport activities also kerps them from getting involved in the wrong things."
Mark Thompson	Bakersfield, CA	2019-06-27	"I'm tired of liberals and politicians taking away the land of the free from us hard working normal people."
shannon norton	Springtown, TX	2019-06-27	"So many memories with family and friends"
Larry Dowg	Hesperia, CA	2019-06-27	"I have a voice"
Patrick Mederos	Tulare, CA	2019-06-27	"It is such a important part of life on the Central Coast!"
Traci Giglio	Rancho Cordova, US	2019-06-27	"Family Memories"
Angela Munoz	Santa Maria, CA	2019-06-27	"Angela Munoz"
Lisa Lindsay	Carson City, NV	2019-06-27	"Please dont shut everything down. We all love riding"
Richard Bryant	Exeter, US	2019-06-27	"Its a great place for family and friends to meet and even make new friends."
Travis Cavanaugh	Corona, CA	2019-06-27	"Family's are built during trips like these!"
Jeannine Wade	Santa Maria, CA	2019-06-27	"Keep the beaches open to campers and recreation!"
Keith Roberts	Oceanside, CA	2019-06-27	"Stop government overreach. The land belongs to the people not the government."
Princess Angie Burgos	Visalia, CA	2019-06-27	"The dunes is historical"

Name	Location	Date	Comment
clayton chaban	Lodi, CA	2019-06-27	"It's a tradition for families and friends that shouldn't be taken away."
Ashley Watkins	Reedsport, OR	2019-06-27	"I grew up just a couple of hours away from the Oceano Dunes.  During the summers we would love to camp out on the dunes, and as we got older, we started taking our children there. It is one of the very few safe areas along the Pacific Coast to camp safely (without fear of sneaker waves). I would love to see this saved for public use for many future generations."
Misty Angel	Bakersfield, US	2019-06-27	"I would like to see the Oceano dunes stay open"
David Sotomayor	Bedford, TX	2019-06-27	"David Sotomayor"
Peggy Quinn	Merced, US	2019-06-27	"This is Not what We the People Want! Save The DUNES"
Andrew Jones	Blythewood, SC	2019-06-27	"I grew up there having a great time and would like to relive it a few times before I die"
Cristina Faria	San Jose, CA	2019-06-27	"I love camping there"
Jackie Butler	Riverside, CA	2019-06-27	"The memories we make on trips are priceless. The bonding with family and friends making our relationships stronger!"
Janeth Guzman	Hanford, CA	2019-06-27	"This is an amazing recreational area we're fam siloed can go to have fun! Ocean dunes is the closest we have around this area (559). Many of us enjoying going to the dunes to get away with out families! Of you take away this for our children and families I feel like Pismo will take a huge hit financially!"
Israel Ramirez	Hollister, CA	2019-06-27	"It's a great place for camping"
Matthew cabrera	Santa Maria, CA	2019-06-27	"The dunes is a safer place than ditches and river beds and keeps us out of trouble and causing harm to people private properties"
Mark Willey	Aliso Viejo, CA	2019-06-27	"It's important"
Elizabeth Centers	Indian Springs, NV	2019-06-27	"My brother visits this place often and my mom lives in arroyo grande."
George Henson	San Luis Obispo, CA	2019-06-27	"The five cites can't afford to lose the business the the dunes bring in."
adkins devin	Glendora, CA	2019-06-27	"I like to go to Pizmo during the summer months when it's too hot to ride Glamis Calif please keep this open this is the last OHV Enforcement on the coast and it's a awesome place to go in the summer"
Guero Torres	US	2019-06-27	"I love Spending Time With My Family And Friends in The Dunes."
Kenneth Lazuka	Antioch, CA	2019-06-27	"I ride and camp sad that you poeple want. To take the fun a way"
Melanie Blythe	Fresno, CA	2019-06-27	"Keep the dunes open!"

Name	Location	Date	Comment
Angelita Orosco	Fresno, CA	2019-06-27	"This is my family spot"
Elbira Briones	Visalia, US	2019-06-27	"Great place for take our children too growing up I had great memories. Love the same for my kids and grandchildren!"
Terra Marchant	San Francisco, CA	2019-06-27	"I grew up here and have fond memories of camping at the dunes"
Jerred Daulton	Oakland, CA	2019-06-27	"Sierra club are a bunch of pussies"
Don Schroeder	Bakersfield, CA	2019-06-27	"We enjoy spending our vacation on the dunes."
Jeromie Fairchild	Oakhurst, CA	2019-06-27	"Pismo is one of my favorite places to go"
larissa nevarez	Fresno, CA	2019-06-27	"Oceano should stay open!"
Janeth Guzman	Hanford, CA	2019-06-27	"Ocean dunes is the closest we have to a beach for folks like us in Hanford! My family and parents have always traveled to Pismo and the dunes for recreational use! We have built many memories there along with thousands of other people! The dunes are what attracts many many people to Pismo beach. I fear that if we close down the dunes it can become a huge financial hit to Pismo beach as well. Many people travel to Pismo beach to go to the dunes. This can take a hit on people's buisness ontop of Taking a memorable land mark from the people!"
Amy Argentieri	Santa Maria, CA	2019-06-27	"This area is a one of a kind experience! To actually be able to camp on the beach and awake to hearing the ocean is amazing! The recreational adventures help to strengthen family bonds and friendships that forge memories that last an entire lifetime!"
Mary Brown	Lompoc, CA	2019-06-27	"We love family trips to the dunes ##"
Destiny Harter	Bakersfield, CA	2019-06-27	"I've spent way to many years at this camp ground to see it be closed down. Save our camping! It helps get families together to spend good quality time with one another."
Carey Britton	Oakland, CA	2019-06-27	"This place means everything to me"
Kim Zimlich	Lakeside, CA	2019-06-27	"I can."
Trevor Lavache	Los Angeles, CA	2019-06-27	"I love the dunes"
Anson Chan	Sacramento, CA	2019-06-27	"I want to help keep Oceano Dunes SRVA open"
andrew dalleluche	greeley, CO	2019-06-27	"Because Jodi Sledge says so."
Jamie Clere	Fresno, CA	2019-06-27	"Riding our OHVs with our children is a family tradition. We meet family from as far as Oklahoma to meet up in Oceano Dunes to camp and see family from all different places. Closing this park would be detrimental to the economy of the Pismo area. Most people who enjoy Pismo and the Dunes, including us, come from out of town. The city depends on this tourism, I'm sure."
Deanna Segura	Lompoc, CA	2019-06-27	"Deanna Segura"

Name	Location	Date	Comment
Stephen Tyler	Sonora, CA	2019-06-27	"Pismo dunes are life !!"
Brycen Guilfoyle	Colorado Springs, CO	2019-06-27	"Seriously Cali can you please leave me a reason to visit?"
Linda Austin	Salt Lake City, US	2019-06-27	"This is a great place for family and friends to have fun together."
Ed jordan	Newark, CA	2019-06-27	"Keep the Dunes open."
Barry Johnson	Phoenix, AZ	2019-06-27	"Our family loves the dunes and look forward to every year playing in the Dunes"
Nicholas Shugart	Moapa, NV	2019-06-27	"Nicholas shugart"
Mari Varni	Modesto, CA	2019-06-27	"Mari varni"
sheryl dalton	Morgan Hill, CA	2019-06-27	"It just has to be saved keep signing"
Tricia Bergin	Bakersfield, CA	2019-06-27	"Tricia Bergin"
Leslie Klinke	Buena Park, CA	2019-06-27	"I am an off reader for 35 plus years and have many great memories here, plus am looking forward to many more here."
Katherine Kahler	Bakersfield, CA	2019-06-27	"My family has been camping at Oceano for years and it's good clean fun the whole family can enjoy."
Janise Nighbert	Bakersfield, CA	2019-06-27	"Janise Nighbert"
Jim Mayo	Rohnert Park, CA	2019-06-27	"The coastal commission is out of touch with the general public that they SERVE!!"
Tony Haines	Tracy, CA	2019-06-27	"My car club comes to the beach once a year and we love parking there and taking photos."
Josh Lawler	La Habra, CA	2019-06-27	"Keep the dunes open!"
Debra Crowley	Covina, CA	2019-06-27	"Debra C Crowley"
Edmund Nunez	Visalia, CA	2019-06-27	"We have been going to the dunes and the pismo are since we were kids. Close the dunes you will hurt the whole coastal community. Do not close the dunes."
DAvid Booth	Winchester, CA	2019-06-27	"Got to keep ohv riding areas open."
Chris Mercer	Odessa, TX	2019-06-27	"The loss of any recreation area should be stopped. Losing a place where families make memories and where fathers teach there kids life lessons is a horrible thing"
Justin Balesteri	modesto, CA	2019-06-27	"We have almost no open space riding areas in Northern California where kids can do something besides drugs, drinking, and getting into trouble"
Laura Kirk	Bakersfield, CA	2019-06-27	"Laura kirk"

Name	Location	Date	Comment
Michelle Gong	Sacramento, US	2019-06-27	"I want the sand highway and the dunes to remain open as a slice of Americana!!!"
Jeff Williams	Fort Mohave, AZ	2019-06-27	"This land is owned by the people and should not be regulated by the few who complain"
Jessie Alonzo	Las Vegas, US	2019-06-27	"Help save Oceano Dunes!!"
Wayne Copes	Venice, CA	2019-06-27	"Please don't take away any more of our dunes. These dunes put this area on the map, and it is our playground. Please don't let the greedy turn it into something else."
Jettie Oliver	Delano, CA	2019-06-27	"Jettie Oliver, great family place to go and have family time. If closed the the city would loose a lot of money and businesses would crumble."
derrik miller	Vacaville, CA	2019-06-27	"All arguments against OHV use in pismo is s bunch of malarkey.With high winds in the dunes comes dust.Ohv use does not create dust in sand, only dirt."
Priscilla mora	San Bernardino, CA	2019-06-27	"I believe in good and clean family fun"
Susie Brumett	Mt Meadows Area, CA	2019-06-27	"Susie Brumett"
Lisa Walsh	Visalia, CA	2019-06-27	"I have only been in CA and enjoying Oceano Dunes for five years but I have grown up riding in Dunes. I started going to Silver Lake Sand Dunes in Michigan when I was two. Riding on my own since I was five learned how to drive a dune buggy by 11. There are many improvements that can be made at Oceano to keep it safer and to protect and preserve it for the enjoyment of generations to come. If it were to close completely, It will destroy not just the local economy and family businesses, it will destroy the joy that it brings visiting families from all over the state and the world."
Dustin McEachern	Riverview, US	2019-06-27	"It's a part of my childhood. Pismo gives families a place to create memories of a lifetime."
Ryan Gutile	Madera, CA	2019-06-27	"Over regulation and over government sucks."
Jason Mcclune	Fresno, CA	2019-06-27	"I grow up with my family at the dunes and would love to do the same with my kids"
Kristy Wood	Grover Beach, CA	2019-06-27	"Huge part of my life please don't close the dunes!!"
Mark Lee	East Lansing, MI	2019-06-27	"Mark a lee"
Michael Davis	Los Osos, CA	2019-06-27	"Michael J Davis"
Travis Asmus	Santa Maria, CA	2019-06-27	"I'm signing because of the economic revenue flow that this tourist attraction brings."
Jessica Decicco	Fresno, CA	2019-06-27	"Jessica DeCicco"

Name	Location	Date	Comment
Vikki Crawford	Brookline, MO	2019-06-27	"I love to fight for something that's worth fighting for."
Joey Lambert	Fontana, CA	2019-06-27	"I can family orientated. Fun for everyone."
Shelley Crane	Bakersfield, US	2019-06-27	"My family has grown up riding in the dunes. Please don't take our OHV rights away. We want our kids to grow up camping and riding the Ocean Dunes too! It's tradition!"
Chris Brackett	Santa Maria, US	2019-06-27	"This would also greatly impact OHV and RV sales across the state."
Ma Moneliza Altre	Canoga Park, CA	2019-06-27	"To help protect"
David Tristan	Lancaster, CA	2019-06-27	"Need to stop try to control our live and everything we do stop red sticker on OHV"
Brandy Coburn	Kingman, US	2019-06-27	"Need to keep places like this open for everyone to enjoy ."
Rowdy Fitzgerald	Orange Cove, CA	2019-06-27	"The blatant over reach of the California government is infuriating. The fact that they think it's acceptable for them to try to stop us from utilizing our public lands is a clear sign they are out of touch with the public. They work for us, we don't work for them. People need to realize that and vote these people out of office!"
Laura Desousa	Modesto, US	2019-06-27	"Been coming to pismo for years. Lots of family fun and great memories. Be so sad to see it close."
Alex Baisa	Sacramento, CA	2019-06-27	"Our family enjoys camping on the beach, this gas been something I've been doing since I was a kid with my day and something I do with my kid and would hope they can do with thiers"
Susan Bouchee	Griffith, IN	2019-06-27	"Hope you get all the signatures you need! ��"
Donald Gerhardt	Prather, CA	2019-06-27	"A small group of unelected individuals with a personal agenda shall not dictate how we the people use our public lands!"
Alani Giglio	Reedley, US	2019-06-27	"the Oceano dunes should stay open for the public for get away vacations"
Sandy Lynch	Visalia, CA	2019-06-27	"Sandy Lynch"
Frank Mata	Carmichael, US	2019-06-27	"I care about our rights"
Julia Bisson	Mesa, AZ	2019-06-27	"Julia Bisson"
Tawnee Knight	US	2019-06-27	"Tawnee Knight"
Brooke Cottrell	San Luis Obispo, CA	2019-06-27	"I love the dunes that's the only place around here to have a little fun with our toys"
Zach Keefover	San Jose, CA	2019-06-27	"Keep our oh parks open and keep piano open"
krystle Sayers	berryville, AR	2019-06-27	"I am signing because this is BS leave the dunes open"
jacob bosick	Prescott Valley, AZ	2019-06-27	"It's a ridiculous law"

Name	Location	Date	Comment
Shanny Freeman	Paradise, CA	2019-06-27	"I love my nephew and he likes loves the sport! Welland I love the dunes"
Anita Herdman	Fort Myers, FL	2019-06-27	"Anita Herdman"
Trinity Entler	Panorama City, US	2019-06-27	"I love riding here"
Chelsea Diede	Sonora, CA	2019-06-27	"This is our family vacation spot!! Please don't take this away from us��"
jamie williams	kerman, CA	2019-06-27	"my family and friends go every year. Its tradition, my kids have grown up looking forward to this trip for the past 7 years."
Danielle Wilkey	Reno, NV	2019-06-27	"We need to have places to ride. If you shut everything down then it's more likely for them to go other areas that arnt ok to be off road. This off road scene is growing like crazy. It's great for the economy and it's a blast to be outdoors. Maybe gear more towards off road and find some balance."
Chuck Hernandez	Tulare, CA	2019-06-27	"The designated Dunes need to remain open and managed by local responsible groups, businesses and Federal funding."
Shawn Cason	Fresno, CA	2019-06-27	"This is a staple of the central coast, please do not take this away, California is regulated enough!"
Brian Singenstrew	Bakersfield, CA	2019-06-27	"There are no other places around here to ride and camp. Keep the dunes open!"
annie thao	fresno, CA	2019-06-27	"Save oceano dunes!"
Pam Adkisson	Santa Maria, CA	2019-06-27	"This is a terrible idea!, closing the Dunes!! I do not support this at all. A not so subtle land grab."
Kelsey Mehling	Shaver lake, CA	2019-06-27	"The dune were my childhood basically we can't lose that I have had so many memories there."
gabriel seguin	anaheim, CA	2019-06-27	"Non sense!! No other place around to camp and ride!!!"
Eric Nowaczynski	Bonita, CA	2019-06-27	"We need this, for generations to come"
Michael Boyle	Fruita, CO	2019-06-27	"We need to keep recreation areas available to the public."
Lance Barnett	US	2019-06-27	"We need enjoy the outdoors more"
Trever Goldberg	Bakersfield, CA	2019-06-27	"Trever Goldberg"
Sheryl Cowan	Oceano, CA	2019-06-27	"We love the dunes. We live close enough to hear all the vehicles out having a wonderful time. And I love it. We frequent there with our family and would be heart broken to lose those memories."
noah shepherd	Phoenix, AZ	2019-06-27	"I've been riding there since i was in the military, not going to stop me from camping there."

Name	Location	Date	Comment
Tawni Knotts	Clovis, CA	2019-06-27	"I am signing because a lot of wonderful memories have been made there!! And many more need to be made by thousands of families!!"
Theresa Harvey	Bakersfield, US	2019-06-27	"We need right"
Justin Smith	Paso Robles, CA	2019-06-27	"I've been going here my whole life"
Lauren Stein	Fresno, US	2019-06-27	"It helps create positive memories"
Jacob Henline	Orangevale, CA	2019-06-27	"I grew up riding quads and dirt bike here and feel my sons should have a chance to do it also."
Mandy Veloz	Buena Park, CA	2019-06-27	"Because the dunes shouldn't be closed because some people litter.  I believe stricter punishment should be enforced for the ones who are being disrespectful to the dunes."
Darian Hurst	Fresno, CA	2019-06-27	"This is America! We should have more access not less. I'm an avid camper and while I have not camped at the Oceano Dunes I think that these restrictions on access to camping places is a growing trend that is not necessary and a restriction of fundamental freedoms."
Brandon Walline	Santa Clarita, CA	2019-06-27	"We love pismo"
Carrie Johnson	Inglewood, US	2019-06-27	"I'm signing because we need a place to ride. Keep it open please!"
Bryan Wolter	La Quinta, CA	2019-06-27	"I'm a avid off road rider, closing this park is idiotic, it is SAND DUNES riding there won't effect erosion of movement or anything! Stop telling us where we cant ride!!"
Jose Valadez	Rowland Heights, CA	2019-06-27	"My kids enjoy camping and riding quads at ocean dunes"
George Young	Stockton, CA	2019-06-27	"This is a huge state this is only a tiny 6 mile stretch we can use and enjoy I learned from my parents about why to respect love and take care of our trails and outdoor areas because of loving to use them. I clean up after myself and I spend tons of money on my camping trips, food, parts, fuel, machines it really helps the local economy and gives almost a million people a year the experience of a lifetime dont close it down you haters"
Barry Pries	Discovery Bay, CA	2019-06-27	"I've been to the dunes many times I do not want them closed Many good times there with my family and friends"
Jennifer Leininger	Arroyo Grande, CA	2019-06-27	"The dunes need to stay open!"
Sandee Hudson	Terra bella, OR	2019-06-27	"This has been a family spot for many generations to enjoy our outdoor activities Please don't close this down"
Kenny Breese	Atascadero, CA	2019-06-27	"Just don't know what to say. Once again government not listening to the peoples"
Jacob Jones	US	2019-06-27	"Been going for years"

Name	Location	Date	Comment
S G Jerry Bronstrup	Stevenson Ranch, CA	2019-06-27	"I am advocating for the rights of not just the OHV community, but also the many businesses that will suffer greatly due to closing Pismo, (Oceano), dunes to off road recreation. This destination has been a part of my family's tradition for over 70 years. My mother and uncle grew up in Oceano. My grandfather was the SP station master in Oceano. I have been a part of this beach all my life. Unfortunately environmentalists have always looked at "Oceano dunes" as ground zero for the battle against OHV recreation. We have fought against overwhelming odds. To lose this is to destroy a community in the name of progressivism. It will completely decimate both Pismo and Oceano's economy."
Deanna Weidler	Arroyo Grande, CA	2019-06-27	"I've lived here my entire life! Keep the dunes open!"
Karim Belhacene	Redlands, CA	2019-06-27	"Good raison"
Andriana Flores	San Pedro, CA	2019-06-27	"Please keep the dunes open, it will be detramental to the local businesses if it is closed. It brings thousands of people into the area which raises city revenue and helps support all the local businesses. This is a sport and a tradition for many many families and people that travel from afar. Please keep it open. It is a gem, dont take that away from your city"
James Horn II	Coalinga, CA	2019-06-27	"We dont need to be loosing anymore freedoms"
Nonny Mercado	Armona, CA	2019-06-27	"Oceano dunes has brought me and my family lots of great times and memories. This will definitely be heart breaking to see the park closed for good. Please keep into consideration all the good and fun this park has to offer family's from all around."
shannon gates	Aromas, CA	2019-06-27	"It brings family and friends together. Helps kids get out and have fun in the great outdoors"
Daniel Torres	Georgia	2019-06-27	"Going to these dunes have been a family tradition since I was born."
Shannon Baker	San Francisco, CA	2019-06-27	"The dunes have always been a place for us to go and get away and have fun and now we go there to remember a loved one and ride with him dont take that away from us"
Anthony Ramos	US	2019-06-27	"I love camping, and believe it is our right as taxpayers to enjoy this land."
Ryan Chamberlin	Colusa, CA	2019-06-27	"To protect OHV for future generations."
Bobby Roybal	Van Nuys, CA	2019-06-27	"It's the right thing to do"
Christina Richards	Sedona, AZ	2019-06-27	"Stop taking away our lands!!! This has been a family camping and sand riding place since I was a kid, let people live and enjoy themselves!!! Eventually California is just going to be roads and houses and nothing fun to do. • Leave Pismo alone!!!"
Steven Goldine	Sunnyvale, US	2019-06-27	"Why take away something that brings so much joy to so many people? Also, why ruin Pismo culture and economy?"

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Raquel Belmontez	Norwalk, US	2019-06-27	"I enjoy our once a year camping trip to Oceano Dunes. By all means we respect the beach and are thorough with cleaning up before we leave."
Shawn Spencer	Rosamond, US	2019-06-27	"Shawn spencer"
Mario Robles	Yuma, AZ	2019-06-27	"I love the outdoors and I believe we have the rights to ride at open areas"
Anthony Lopez	Winnabow, NC	2019-06-27	"Childhood memories that others can enjoy"
Michael Stephens	US	2019-06-27	"Michael o"
Tina Toste	Hanford, CA	2019-06-27	"Been vacationing here since I was a teen (now 54). We brought our kids here and now their kids. This is a great place to relax and let our children enjoy some down time!!"
Jeremy Shrader	Sunland, CA	2019-06-27	"I think that we should beable to enjoy the dunes as we have for years before even my time"
Jackie Carlson	Boise, ID	2019-06-27	"Im signing because we should have places to have fun and keep family functions together outdoors. Everything that is fun outdoors is being taken away. Please keep this open"
Jeff Jarvis	Dallas, TX	2019-06-27	"It's a great place"
Paul Macias	Santa Maria, US	2019-06-27	"Where Countless memories were made."
Irvin Glenn	Bakersfield, US	2019-06-27	"Keep the dune open. These activities keep families together."
Karl Hansen	Napa, CA	2019-06-27	"It is imperative that we keep these public lands open and available to responsible citizens."
Rosemarie Nelson	Lodi, CA	2019-06-27	"It's a beautiful place and should remain available to generations to come! Keep it OPEN!!!!"
Suzette Martin	US	2019-06-27	"Because we need recreation!"
chris corvinus	Grover Beach, CA	2019-06-27	"This is a wonderful place to make memories. Be mindful people that these people trying to close the dunes need to be voted out of office."
Melissa Courtney	Coarsegold, CA	2019-06-27	"I'm signing because I can't stand that California politicians are constantly closing places and roads and telling us what we can and can't do. So trying to control us. You already have so much beach closed."
Andrianna Gervais	Citrus Heights, CA	2019-06-27	"I grew up in the Five Cities area, and frequently used the dunes for recreation. It would be terribly sad for future generations not to get to do the same. Furthermore, it would hurt many businesses, whose livelihoods depend on the summer influxes of tourists to stay afloat."
Chris Cubre	Fresno, CA	2019-06-27	" The fake environmental concerns are asinine, the neighbors that bought down wind from SAND DUNES are fools for complaining

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			about P.M. I spend a ton of money on hotels, restaurants, shops, and supplies about 8 times a year. My family will be devastated if this closure occurs."
kim semmens	Lake Havasu City, AZ	2019-06-27	"Kim Semmens"
Thomas Myers	Concord, CA	2019-06-27	"This area should remain open for the citizens to use it."
Steve Stewart	Hobbs, US	2019-06-27	"California is fucking nuts"
Robert Poole	Arroyo Grande, CA	2019-06-27	"This needs to stay open!"
Stephanie Duke	Bakersfield, CA	2019-06-27	"Its a very memorial place to alot of people and thats where the fun is to ride and camp .ots one of many bezt parys of pismo."
Kalyn Stiles	Fairfield, CA	2019-06-27	"I am signing because every year we look forward to Jeep Beach in october. It's a family tradition. Everyone is respectful to the ocean, cleans up after them self's and has a good time."
Gilbert Busick	El Segundo, CA	2019-06-27	"Off road recreation needs to remain at oceano dunes"
Meranda Walton	Sacramento, US	2019-06-27	"I have been coming to oceano dunes since I was a kid.  Unfortunately this is not the only place that has been shut down to  OHV in the recent past and it's becoming a "slippery slope". I don't  want OHVclosure to become the norm. Kids need to learn to play outside, where are they going to do that if all the places to do it are closed?!"
Jamie Kincaid	Taft, CA	2019-06-27	"Pismo beach is our second home! And if ppl don't like the wind/Sand DONT MOVE NEAR A BEACH"
Matthew Prewett	San Francisco, CA	2019-06-27	"Off roading is a way of life and this is the only beach in California in which one can do so."
Judith Kavanaugh	Sonora, CA	2019-06-27	"We need off road areas for people to enjoy. Keep it clean and open."
Cathy Ratledge	shasta lake, CA	2019-06-27	"There are a lot of people look forward to riding and unwinding annually as good family fun. City folks need this place to enjoy."
Jaye Phillips	vacaville, CA	2019-06-27	"My family goes here every year"
Chris Smith	Ripon, CA	2019-06-27	"I want to keep Pismo Dunes aka Oceano dunes open."
Austin Bowling	Boise, US	2019-06-27	"Just one of the reasons why I moved out of California I hope it stays open it was some good times when I lived over there"
Michael Norris	Los Angeles, US	2019-06-27	"Keep dunes open"
Todd Turner	Winchester, US	2019-06-27	"In support of my friends to help ensure the dunes stay open!"
Brandon Alisio	US	2019-06-27	"The dunes are awesome"
Pamela Carter	Fairmount, GA	2019-06-27	"It's the right thing to do"

Name	Location	Date	Comment
John Krueger	San Luis Obispo, CA	2019-06-27	"I'm signing because I'm not an asshole."
Sonia Gonzalez	Dinuba, CA	2019-06-27	"I agree"
Jannet Ruiz	Lompoc, CA	2019-06-27	"i go as a family get away my kids and husband and my self love to ride and camp there, closing this park wouldnt give our a family a place to ride. We come from lompoc to pismo to ride and camp and enjoy family time."
Robert Johnston	Phoenix, AZ	2019-06-27	"Grew up in these dunes. Lots of good memories."
Micah Smith	San Luis Obispo, CA	2019-06-27	"I love camping, riding and playing in the dunes. Do not close the dunes, please!"
Katherine Ferrell	Reno, NV	2019-06-27	"Friends and family still love this location to spend time with their families as do I"
Maleka Navarro	Stockton, CA	2019-06-27	"It's my home town. Many family vacations here. So many memories"
Adam Veves	San Diego, CA	2019-06-27	"I love riding and it supports the local economy. Responsible riders don't damage the ecosystem. Make laws and enforce them. The money in our sport supports a big part of the local economic growth. You close areas and businesses close. Find a middle ground and punish the negligent. This is still America right?"
Gabe Cardullo	US	2019-06-27	"We need more areas to ride not less"
Derek Fox	Newport Beach, CA	2019-06-27	"Public land should be for public use."
Justin Herbert	Cabazon, CA	2019-06-27	"I enjoy riding the dunes and spending time with my family there."
Nikki Rodriguez	US	2019-06-27	"I've been an avid dunes rider all over SoCal since I was 2 years old. There are so many people who enjoy this activity with friends and family. It's something people of all race and ages can do and enjoy it. Memories that last a lifetime are made at the dunes."
Barbara Powell	Bishop, CA	2019-06-27	"Barbie Powell"
Brice Henry	Bakersfield, CA	2019-06-27	"There is no reason to shut down the ocean dunes, the animals areas are blocked off already, no vegetation is being hurt and the noise is so faint you cannot even use noise as a complaint we the people own that ground stop trying to take it all away Lets not forget the income that will be lost"
Mike Borges	Hanford, US	2019-06-27	"Pismo beach and surrounding areas are going to feel the pain! Just like everyone that enjoys going to the dunes!!"
Samuel Price	Waterford, US	2019-06-27	"I'm signing because I've been going here since I was five, and I'd hate to see it close. People need to move by a riding area knowing there will be extra noise."
Amy Barnhart	Taft, CA	2019-06-27	"I love going and playing there. One of the best family spots anywhere."

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kammie ellis	oceano, CA	2019-06-27	"This adds to our economy you will be taking away jobs"
Elaine Newton	Tollhouse, US	2019-06-27	"So tired of environmentalist dictating and pushing their personal opinions and thoughts as to how the world should be saved. Save a frog, save an owl, save a tree, who cares how it effects the human being, it's effing ridiculous! I'm sick of all the environmental bs, and bs rules they impose or push based on personal agendas. Your going to hurt the your local businesses as well if you close the dunes. California sucks! Stop taking away the use of our public lands."
Dirk Piersma	Turlock, CA	2019-06-27	"The dunes are by far the most popular OHV site in the state. And why shut down an OHV park that benefits the community so much?"
Jeannette Glass	Arroyo Grande, CA	2019-06-27	"Born and raised right here on the central coast. Been going down to ride on beach my whole life. My parents owned an atv rental when I was a teen ager. OHV brings in so much revenue to our coastal communities. Its a shame they are trying to take it away from us."
Lori Taylor	Visalia, CA	2019-06-27	"Lori Taylor"
Brendan Manes	Tehachapi, CA	2019-06-27	"We are limited to where we can ride. Stop taking our riding areas"
Stagno Christine	Pleasanton, US	2019-06-27	"Our family has been camping at the dunes for many, many years. It has always been a family favorite. We would be devastated if it closed �"
Devin Morse	Fowlerville, MI	2019-06-27	"There needs to be a place for people to go and have safe fun."
James Billups	Gresham, OR	2019-06-27	"The Californian people own the dunes, not the government. They should be allowed, respectfully, to utilize their open spaces."
Dane Locke	Mendota, CA	2019-06-27	"The coastal commission is out of control . This is a tiny piece of the coast enjoyed by many . 10% of the original area is all that is open but that is to much for the zealots . If this gets closed then the commission should start returning the entire coast to nature . Start removing beach front houses and hotels ."
Brandi Teeples	Hughson, US	2019-06-27	"I have created memories there with my family and want to continue to do so"
Debbie Rogers	Pasco, WA	2019-06-27	"Debbie Rogers"
Bobby Bentle	Hobbs, NM	2019-06-27	"I love that place"
Shelby Thompson	Porterville, CA	2019-06-27	"Shelby Thompson"
Brian Enciso	US	2019-06-27	"Keep riding areas open!"
Douglas Herman	Las Vegas, NV	2019-06-27	"The Dunes are CA history and need to be enjoyed by all."
Eva Ritchie	US	2019-06-27	"I have taken my boys camping here year after year. It is a great area to ride and swim and relax. It would be a terrible loss to close

Name	Location	Date	Comment
			the dunes and take this experience away from the next set of campers."
Derek Corrao	Plumas Lake, US	2019-06-27	"So many family memories made there and so many that still need to be made!!!!"
David Delihant	Fair oaks, CA	2019-06-27	"David Delihant"
brian appiano	Pismo Beach, CA	2019-06-27	"The economic impact this will have on our business will for sure make us close our restaurant"
Janice Borja	Nipomo, CA	2019-06-27	"The dunes have been a part of our family traditions for so long!! Let's not take that away from all the kids and families that enjoy this beautiful place!"
John Banuelos	Morgan Hill, CA	2019-06-27	"Pismo is a great family and friend spot. It brings a lot of money to that community. I have been going there for years. It would be wrong to close this because certain people dnt like to camp or are upset at us having fun on the beach. Whats next killing the monarch butterfly because it brings to many tourist to the town as well!!!!"
Gunner Mitchell	Lake Havasu City, AZ	2019-06-27	"I am signing because I feel Pismo Dunes should remain open for all to enjoy as it has been for years. My father had been going there all his life, originally from Downey, and once I was about 5 or 6 he began taking me there to pass on his love for the area. I am only one family and if you go to Pismo you will see there are thousands of families that I bet will have very similar stories. Please keep this beach open to off roaders so I and others can continue to pass our love for the area to our friends and family. This is a place where people come together to have a good time doing what they love. Do not take it away."
Warren Bullock	US	2019-06-27	"Access to our public lands is a fundamental right."
Bryan Morast	Indio, CA	2019-06-27	"We have enjoyed pismo as a family for years. It's part of my children's childhood memories."
Noel Ysip	Santa Maria, CA	2019-06-27	"This is a great camp sight. I would love to take my son camping and riding in the future."
Dayton Fulton	Duncannon, US	2019-06-27	"To help chad"
carla watson	San Bruno, CA	2019-06-27	"Keep Oceanes open."
John Popylisen	Hollister, CA	2019-06-27	"This is a family friendly place to ride and has been for decades. The research resulting in closures seems unfounded and a grab at Californian's rights to utilize a great recreational area."
Ron Fallon	US	2019-06-27	"We the people have the right to our public lands"
James Lemos	Petaluma, CA	2019-06-27	"Because Murica"
Amber Sanchez	Fallon, NV	2019-06-27	"I'm signing, but please know that the decision to close the dunes has already been made. Requesting input from John Q. Public is merely perfunctory and bears no weight on the envirowackos

Name	Location	Date	Comment
			decision making process. This is CA and CA is a fetid cesspool of libturds at every level of govt. I do wish you good luck though"
Erik Jordan	Lakewood, CA	2019-06-27	"Freedom."
Christin Elliott	Bakersfield, CA	2019-06-27	"This place has always been home to me!!! KEEP THEM OPEN. So many family memories that I will never be able to get back if this is gone."
david macias	San Bernardino, CA	2019-06-27	"Stop taking our land"
Sandra Holt	Waterford, US	2019-06-27	"We have been going to Pismo beach for over 50 years. Let us keep this monument alive. Let the world share this beautiful place."
Brian Ingram	US	2019-06-27	"This is one of the best places to camp ,ride and enjoy the coast"
Elaine Rosales	Mira Loma, CA	2019-06-27	"This is a place I go to since a child"
Ben Michael	Cool, CA	2019-06-27	"I have many family memories of this place, and places like this are becoming rare."
Kimberly Tune	Everett, US	2019-06-27	"We need more open spaces for the general public, not converted to a space for those with money."
Chris Quinn	Simi Valley, CA	2019-06-27	"I would like my 2yr old son to be able to experience Pismo the way I did."
Phillip Guerrero	Ione, CA	2019-06-27	"I ride and there taking from us pretty soon will have no where to camp with are family and ride."
Kristy Cannon	Playa del Rey, CA	2019-06-27	"I believe it should not change"
Blake Scott	Englewood, CO	2019-06-27	"Public land use access should be equal across activity type. Not only is there high revenue generation from this area being open to motorized access it also helps local businesses that rely on its access."
Don Davis	Modesto, CA	2019-06-27	"Areas like this have been "handed down" through generations of families. I know multiple families who relish the opportunity to pay a visit to the dunes. Keep them open!"
Ashley Hessman	US	2019-06-27	"Awesome memories"
Kim Gass	Grand Prairie, TX	2019-06-27	"Because"
chris torres	Sanger, CA	2019-06-27	"I have been going since I was kid with my family, it's one thing our family looks forward to every year as a tradition. We love to be out there to camp to ride and to have an amazing time with our loved ones."
Sandra Norby	Tustin, CA	2019-06-27	"We love to ride."
Manuel Lopez	Salinas, CA	2019-06-27	"I have always loved going they cant close this place down"

Name	Location	Date	Comment
Summerlyn Sandoval	US	2019-06-27	"This is something families have done together for years. It brings people which brings mom into town. Think of the people who own the rental shops the families that will be struggling cause they no longer have a job"
Sena Woeste	US	2019-06-27	"This beach is so special for so many people, to be able to ride and camp on the beach is so rare. As far as air quality, the people who buy in the area should have considered this as there has been traffic on this beach forever. This is a great income source for our county and only a few people disrespect the beauty of this local treasure."
Stephen Riley	Garberville, CA	2019-06-27	"Because we should be allowed to have some coastline for ohv, plus too good of memories get made here"
Jon Umpierre	Santa Maria, CA	2019-06-27	"The dunes should remain open. Stop trying to close the dunes because of the snowy plover because it's a lie they also breed in Mexico and Mexico doesn't care about the snowy plover at all. it's also not about air quality because we've got better air quality than anywhere else around."
sarina adams	San Jose, CA	2019-06-27	"Sarina Adams"
Laurie wilson	Garden grove, CA	2019-06-27	"Big part of my life and I want to share with my grandkids"
Teresa Campisi	Redwood City, CA	2019-06-27	"We need more open land and fresh air areas where our youth can enjoy an active lifestyle instead of just having their heads in electronics!"
Jesse White	San Ramon, CA	2019-06-27	"OHV riding is vary important. We will fight to keep it."
Crystal Day	Mustang, US	2019-06-27	"Only been here a few times but it was such a fun, beautiful experience. Hope to be able to go there again"
Jared Ruelas	Bakersfield, CA	2019-06-27	"I love going and this is really really fun to go to with the family idk why they would stop this when this brings in lots of money"
becky eccles	North Las Vegas, NV	2019-06-27	"Everyone who pays taxes and those who work out at the beach. Who live in the towns that count on tourists dollars have a right to be at the beach. OHV or camping should not be over looked."
thomas johnson	Chino, CA	2019-06-27	"I love the beach"
scott smith	Bakersfield, CA	2019-06-27	"It's wrong to even think about taking this from people!"
Steve Egbert	Tulare, CA	2019-06-27	"Recommendations of the Coastal Commission are class warfare between rich residents and families seeking recreational opportunities."
claudette villalon	ceres, CA	2019-06-27	"Thats awesome place for families, plz don't take it away"
Vicki Mardon	Orcutt, CA	2019-06-27	"Keep our beaches as they are!!! If you close them it's going to hurt the economy, the beaches bring a lot of revenue to our area. They want to change history and what PISMO beach is all about! I vote No."

Name	Location	Date	Comment
Victor Toste	Alameda, CA	2019-06-27	"I think the dunes are a great recreational area for the second coast and one of our few sources of tourism."
Martin Rodriguez	Fresno, CA	2019-06-27	"I love the dunes its a great getaway"
Tony Inderbitzin	North Fork, CA	2019-06-27	"I'm an avid off roader & nature lover & im tired of my rights being taken away from me."
Craig Binford	Clovis, CA	2019-06-27	"It good for the local environment, economy and culture."
Dylan Miller	Oxnard, CA	2019-06-27	"Keep public lands open to the public."
Gildardo Rodriguez	Kingman, US	2019-06-27	"My buddy is passionate about riding ever since I've know him. So this is for him to have his passion allowed to him."
chrissy crow	Woodbridge, CA	2019-06-27	"I luv pismo we used to camp every 4th of July with my grandpa an his dune buggy club. Keep it open"
Nikki Feddern	Bakersfield, CA	2019-06-27	"Nikki Feddern"
Ernie Mendez	Elk Grove, US	2019-06-27	"Let's keep it clean and everyone have fun."
Kayleigh Millien	bakersfield, CA	2019-06-27	"I love the dunes and we should keep them open!"
Martin Dergan	Discovery bay, CA	2019-06-27	"SVRA parks are something all people should be allowed to enjoy."
D'Aun Pence	El Dorado Hills, CA	2019-06-27	"I want to keep the dunes open"
Tiffany Swedberg	Lake Elsinore, CA	2019-06-27	"Because my family loves this place!"
Kris Rickard	Paso Robles, CA	2019-06-27	"This is bull shit sell your house if you don't like the sand in your house"
Deborah Colbert	Bakersfield, CA	2019-06-27	"Families should be able to enjoy the dunes."
Andrew Brown	Fullerton, CA	2019-06-27	"It's hard enough to find places to ride what we have is what we have"
Levi Vanhooser	Antelope, US	2019-06-27	"Been going my entire life my uncle stated taking me when I was just a child and I take my own family I don't think stupid peoples actions should have an effect on what responsible people do over there"
Sean Evans	Eloy, AZ	2019-06-27	"I'll sign anything!"
Thomas Vosburg	Chico, CA	2019-06-27	"Riding areas are getting less and less in California. Need to protect what we have left."
Scott Thomas	San Bernardino, CA	2019-06-27	"The dust pollution is going to be there with or without the riders.  This is one of the only areas we can ride on the beach. We need more parks opening. Not closing! •"
Francisco Esparza	Santa Maria, CA	2019-06-27	"Im signing because i want to save oceano dunes"

Name	Location	Date	Comment
Robert Steere	US	2019-06-27	"I've spent many years responsibly using the area with family and friends. It's a unique area that can't be found elsewhere."
RIchard Michel	Tulare, CA	2019-06-27	"I'm signing this petition because we are running out of places for off-road activities, shutting this place down will not only hurt the surrounding communities financially, but add to pollution due to people having to travel longer distances to find an off-road park."
Tyler Sites	Paso Robles, CA	2019-06-27	"I'm a local and have always used this beach and would love to continue using this state park for vehicular recreation. The money lost by closing the dunes will be extremely detrimental to the local communities through San Luis county not just pismo beach area."
Susan Waller-Mummert	Bellflower, CA	2019-06-27	"Good Luck. I hope you make your goal."
Stephanie Faucett	Exeter, CA	2019-06-27	"The Oceano dunes have been a family camping spot for years. This is where we come together and reconnect on one of our favorite California beaches. It's more than a camp ground. This is where memories are made and family spends the me together."
Maddie Rowe	Santa Ana, CA	2019-06-27	"I don't want more areas to close to prevent us space"
Angie Belton	Covington, GA	2019-06-27	"Everyone has a right to enjoy a public beach & watch the waves."
Mark Hill	Yorba Linda, CA	2019-06-27	"I believe in the responsible use and management of public lands including O R V areas."
Thomas Sperow	Los Altos Hills, CA	2019-06-27	"Thomas J Sperow"
Brandi Yates	Santa Maria, CA	2019-06-27	"This has been a place my family and i have been going for years. I'd like the opportunity for my daughter to experience it too"
Patrick carter	everett, WA	2019-06-27	"This was the original purpose for the state purchasing this land in the first place. It was voted on before purchasing and should be used for said purchase. We need to stop the bait and switch of government land grabs. And to this the considerable amount of revenue the Dunes generate for the local communities."
Sarah Olsway	San Juan Bautista, CA	2019-06-27	"Pismo Dunes should remain open it brings tourists to Pismo and removing it would take away a lot of revenue."
Cole Milton	Santa Maria, CA	2019-06-27	"I enjoy being able to go to the dunes to camp and ride off-road vehicles. I'm local and don't want to have this taken away."
Sam Noorigian	Los Angeles, CA	2019-06-27	"This is where is learned how to ride and had tons of fun days"
Sarah Alvarado	Kingsburg, CA	2019-06-27	"I've gone here since I was a little kid with my family and I'd love to be to keep making those memories with my kiddos."
Rickey Bunio	El Dorado Hills, CA	2019-06-27	"This has been a spot my friends and family has gone to for years and it needs to stay open"
Alana DiLallo	Modesto, CA	2019-06-27	"This place is special to my family and friends from all over."

Name	Location	Date	Comment
Colby Spears	Bakersfield, CA	2019-06-27	"Oceano dunes is a great place to go and enjoy your weekend with family and friends. Never had a bad experience"
Glennis Bila	Broomfield, CO	2019-06-27	"Keep our lands open for all to enjoy!"
Brad Barr	Corning, US	2019-06-27	"It's a fun place to camp and have some fun. We love camping on the beach and relaxing. It needs to stay open."
Natalie Thornton	Hollister, CA	2019-06-27	"The dunes are a part of California's history. A landmark playground that should be available to the public for generations."
Joe Martinez	Lindsay, CA	2019-06-27	"Joe Martinez"
Ray Guyton	Minneapolis, MN	2019-06-27	"Ita a good cause!"
Jason Bordelon	US	2019-06-27	""I ride" and have been going to pismo dunes for 30 + years. This is the only place of it's kind and should be preserved for the next generations to enjoy. At the end of the day it is only a tiny chunk of beach on a 770 mile coastline in California. If the libtards have their way we will all be sitting at Starbucks talking about whatever libtards talk about, instead of going outside and enjoying life.What a joke!!!"
Kendra Jones	Copperopolis, CA	2019-06-27	"I love camping here and have many family memories here."
Mark Brindeiro	Artesia, NM	2019-06-27	"Grew up going there"
Jose de Jesús Chávez Gómez	Mexico	2019-06-27	"Es por la libertad de hacer lo que nos gusta"
Jonathan Phan	Laguna Niguel, CA	2019-06-27	"The only area that allows coastal access to camping and off-roading, please keep this area open for the hundreds of thousands of people that visit each year."
Jason Gilles	Fresno, CA	2019-06-27	"Keep the dunes open for riding and camping!"
Ken Brown	Henderson, NV	2019-06-27	"Because I love the freedom of riding!"
Heather Booker	Bakersfield, CA	2019-06-27	"I love to ride ,my whole family loves to ride. AMD nowadays there isn't many places left to ride. Great family time riding and camping. Far to less ppl do it. But those who do love it"
Tim Kurreck	Placerville, CA	2019-06-27	"It's important recreational area."
Tami Silva	US	2019-06-27	"I believe it would hurt California if they close Oceano. It attracts so many traveller's mainly because you can drive on the beach. It would kill the revenue for all the beach shops. Please don't take away what this beach is known for. I never imagined it closing down."
Tiffany Blevins	Bakersfield, CA	2019-06-27	"All of our family and friends have so many memories and kids love it there please dont close our fun ."

Name	Location	Date	Comment
Jason Bordelon	US	2019-06-27	"Above the love of riding. Above the Beauty and freedom that it gives to the Riders. The economic devastation that this will bring to the local economy is unreal."
Debi Wiedekamp	Clovis, CA	2019-06-27	"This is ridiculous! California needs to stop regulating everything!"
Joe Flores	Tulare, CA	2019-06-27	"I first went to the dunes as a child with my parents and brothers as have thousands if not millions over the years. It would be a great loss to those people and future generations."
Fred Grajo	San Pablo, CA	2019-06-27	"Im signing because these are our recreational areas, this is our outlet when we need time away from everyday hustles, this is where we enjoy taking our families. Places like this need to continue to be these things, for people."
Lynnette Sheets	Pleasanton, CA	2019-06-27	"Because it's my California!! The wild life is flourishing, people are happy, why not"
John Taylor	Paradise, CA	2019-06-27	"This is one of the very few places we have left to have an off road adventure with family and friends. We have been coming here for years. My wife and I even honeymooned in pismo so we could ride the dunes together. Let us stand with you as you stand up in favor of OHV access. Thank you."
Ryan Babb	Modesto, CA	2019-06-27	"I enjoy freedom"
Tim McNIff	Santa Maria, CA	2019-06-27	"They will kill tourism if it passes ."
Sallie Gretzner	Barstow, CA	2019-06-27	"Sallie Gretzner"
William Pemberton	Salinas, CA	2019-06-27	"Great family moments shared riding the dunes. Getting to go to the dunes kept me Off the streets."
Tammy Kendall	Lake Elsinore, CA	2019-06-27	"Anything to stop the Democratic Party of California."
Bo Burnham	Santa Maria, CA	2019-06-27	"2TD"
Megan Dickson	Oakdale, US	2019-06-27	"I'm signing because the times I spent at pismo beach dunes camping with friends and family were unforgettable and I would hate to see it go before I got the chance to take my own future family one day"
David Ingram	Desert Hot Springs, CA	2019-06-27	"It's a nice place to ride and please keep this area open for the public. Give adults and kids a area to enjoy and keep them off the streets."
Greg Stone	Kingsburg, CA	2019-06-27	"Having A great time with family and friends"
Andrea Taylor	Bristol, TN	2019-06-27	"It's a beautiful place to go and ride and let all of the stress go for that moment"
Ceceilia Gonzales	Visalia, CA	2019-06-27	"Cecelia Gonzales"

Name	Location	Date	Comment
Evan Flores	Bakersfield, CA	2019-06-27	"Had many great times, trips and memories here and plan to have many more with my family and friends."
Collina Arnold	Grover Beach, CA	2019-06-27	"Collina Thole"
Roel Cunanan	San Jose, CA	2019-06-27	"We all need access to public land to enjoy"
Charlotte Lawrence	Fresno, CA	2019-06-27	"It's ok to have a place for us to rideother wise people would go other places where there is a lot.of untouched wildlife and cause more harmlet this place be"
Robby Martinez	Vista, CA	2019-06-27	"The outdoors an riding is my life"
Israel Sanchez	US	2019-06-27	"Our family has been going there for generations"
Bryand Raimundo	Hanford, CA	2019-06-27	"Becouse it's a place we all can go to ride and enjoy our quads and ATVs"
Darrin Deatherage	Chico, CA	2019-06-27	"I love this place. Keep it open."
Nadine Foose	San Antonio, US	2019-06-27	"There are so few places left to enjoy now. It's frustrating when they want to take away from people who want to enjoy time with family and friends at amazing places."
Jaysin Smith	santa maria, CA	2019-06-27	"Fuck you that's why. Stop trying to take something g special and fun away from people you boot licking commies"
Julie Thompson	Arroyo grande, CA	2019-06-27	"Julie Thompson"
Diana Cole	Santa Maria, US	2019-06-27	"I grew up at pismo dunes and now my children are growing up there we like go out there for family and friends to have a good time It's a place where people go to relax meet new people have fun riding,bbq, camping a place the kids can go play."
Eddie Sanchez	Pomona, US	2019-06-27	"I am signing because camping out has been part of my family's getaway/family reunion for the last 25+ years. And now i am taking my own kids camping. So if you take this away you will be taking a big part of my familys life away."
Janice Robertson	Visalia, CA	2019-06-27	"We need to keep enjoying these dunes!"
Aeriel Harmsen	Payson, AZ	2019-06-27	"I am signing this because I went to Pismo in October for my first time and it was an awesome experience. Hope other people get to enjoy this place!"
Vincent Battaglia	Union City, CA	2019-06-27	"I Love Having Freedom!"
Steve Lopez	Sacramento, CA	2019-06-27	"It's not right to shut down."
Heather Ibarra	Modesto, CA	2019-06-27	"Pismo is great family fun!"
Angela McPhetridge	Visalia, CA	2019-06-27	"It's a great place we're family can go to have fun."
Joe Stayton	Camarillo, US	2019-06-27	"Joe Stayton KEEP THE DUNES OPEN"

Name	Location	Date	Comment
Dawn Hentkowski	Clinton, MI	2019-06-27	"I'm signing because I have had great memories made here. I would love for future generations to make there own memories there too"
Emily Manjarrez	San Mateo, CA	2019-06-27	"Going to pismo has been a family tradition ever since I could remember. A couple years back I joined the military and have had little to no time to go back home but we always seem to make time to go enjoy family quality time in the dunes. I've made countless of amazing memories and want to continue to make them once I have a family of my own. Oceano dunes is very near and dear to my heart. I would absolutely be devastated if it were to be shut down."
Joe Corona	Hanford, US	2019-06-27	"I'm signing this petition because camping and riding bikes out here has been a family tradition. Let's keep this place open."
Rudy Ruiz	US	2019-06-27	"The dunes need to stay open"
Randall Machleit	Bellwood, WI	2019-06-27	"Murica"
Tim Holt	Pismo Beach, CA	2019-06-27	"I live in Pismo and it's not bad at all. Too crowded to go down there myself but fine. We would not like a liberal group like the Coastal Commission to come here and tell us what we can and can't do with our public park."
Bud Crittenden	US	2019-06-27	"This is ridiculous and someone needs to stand up to the politicians that advocate this stuff and vote there asses out of every office past and present. All this is cutting our freedom down."
paul villa	Lompoc, CA	2019-06-27	"I've been going to dunes fer over 35 years it's a place we have fun and enjoy are toys"
kevin helm	Selma, CA	2019-06-27	"Because this is absolutely asinine!!!!I grew up in the dunes, good clean fun"
William wallace	Chowchilla, CA	2019-06-27	"The dunes are a state park and the public deserves proper access to this beautiful park."
Jason Enlund	Reno, NV	2019-06-27	"Im me"
Josh Stumbaugh	Kettleman City, CA	2019-06-27	"Keep our beach open! This brings so much revenue to slo county.  This place has made so many families memories, would be devastating if it were closed! Keep ohv use in oceano!"
Theresa Touchatt	Santa Clara, CA	2019-06-27	"Because I love coming here and hope to again some day!"
Brandi Walmsley	Winchester, CA	2019-06-27	"We love the dunes!! And it is vital to the economy of pismo and the surrounding areas."
Marisela Nunez	Lompoc, CA	2019-06-27	"Marisela Nunez"
Gino vieto	Hayward, CA	2019-06-27	"Keep pismo alive!!!"
cynthia mcrobie	Ontario, CA	2019-06-27	"Pismo hold a special place in our hearts not only will the closer affect us but it will affect the community. Small mom and pop Business's that depend on tourism will close in due time."

Name	Location	Date	Comment
Oscar Ramirez	Sonoma, CA	2019-06-27	"I want my ohv freedom to not be taken away."
Trisha Powers	Lompoc, CA	2019-06-27	"This is our backyard! Let them ride!! You take everything away from his kids!! What else are they going to do which is fine and healthy for them."
justin hopper	Visalia, CA	2019-06-27	"This place has history far beyond the houses built that are complaining about dust. The safety of riders needs to be addressed but it is simple to fix. Open more riding space so that people have room to spread out."
Shari Wallace	Santa Maria, CA	2019-06-27	"Its the only place on the coast where everyone can go have fun"
Jeffrey Lawton	Visalia, CA	2019-06-27	"Oceano Dunes is public land that has appropriately provided fantastic low-cost recreational opportunities to countless California families for multiple generations. Closing the dunes would be similar to closing California forests to hiking."
Barb Gustafson	Ludington, MI	2019-06-27	"Great memories here"
Anthony Brenneisen	Riverside, CA	2019-06-27	"California needs to stop taking away places where families go to be together and have fun as a family."
Jessica Thiel	Woodland, CA	2019-06-27	"Why runnin soemone fun"
Whitney Whitsitt	Dallas, GA	2019-06-27	"I grew up in California and went to college in pismo beach!! Visit there very often throughout the year!!"
Kenny Machado	Modesto, US	2019-06-27	"They want to close the only dunes to ride in California what a shame! How many jobs will be lost and income lost to all the businesses down there that rely on that state park to bring people in to camp and enjoy a vacation."
Ken Claborn	Oak Harbor, WA	2019-06-27	"I grew up riding in dune buggies. I don't believe that they are the main problem with "air quality" issues in the area. Common sense on everyone's part would keep the dunes open for all."
John Metaxas	Los Angeles, CA	2019-06-27	"I am a riding advocate"
Don Woods	West Hollywood, CA	2019-06-27	"Don't take away our family tradition. We have been riding ohv in the Oceana Dunes for over 10 years every summer. By taking steps to limit OHV use this will not be a viable destination for us to spend our summer vacation."
Georgene Hawthorn	US	2019-06-27	"Three times a year for 20 years i went dune bugging here. This would be a sham to close this down. Meet a lot of friends here to which we ste still friends. Please keep open for our children and grandchildren. Thank you. Ps I am now 66 and still love it there."
Jamie Gordon	Las Vegas, NV	2019-06-27	"Taking something like this away from all of these Families who have been enjoying years and years of Fun is just ludicrous! This is a Getaway, a place where so many come to be free and Enjoy!"
Lisa Cockrum	Atascadero, CA	2019-06-27	"Let the taxpayers and visitors generating revenue use the land that they pay for."

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michael skidmore	Burgettstown, PA	2019-06-27	"Its our right"
Michael Leasure	Hanford, CA	2019-06-27	"I am sick of this government and their bullshit, a good friend of mine lives in San Luis, and removed the electric motors, from her pumps in the pasture, and replaced them with windmills, now the city of San Luis Obispo, are trying to find her because their not getting their kick back from pge."
Brent Aguilera	San Bernardino, CA	2019-06-27	"Because this is a special place my father showed me and I intend to show with my kids"
William Holmes	Oak Park, US	2019-06-27	"Stop taking the peoples property, enough is enough."
Ambrosia Thomson	Sebastopol, CA	2019-06-27	"We as a family respect and utilize these trails."
Richard Suab	San Pablo, CA	2019-06-27	"I have been riding this place for over a decade, we have our rights to this ohv and it's time for the state to stop trying to shut us down."
Damon Lopez	Bakersfield, CA	2019-06-27	"This has been a important part of my life to be able to camp and ride here. Furthermore i think this will severely hurt the economy if it is closed and OHV riding areas are extremely limited."
Shelly Springer	Grover Beach, CA	2019-06-27	"The Dunes are such an amazing place for families and friends to ride their quads and buggies. It's a fabulous place for families to camp and really connect. Do stupid people do stupid things? Of course! But to shut it down because of a few idiots is not the solution. Everyone enjoys being able to drive on the beach and experience the ocean up close and personal. My nephew is in a wheelchair and it is a struggle for him to get to the ocean and enjoy it. Without access via a vehicle, it would make it even more limiting for him. Please keep the Dunes open!"
Matthew D. Cortes	San Luis Obispo, CA	2019-06-27	"It's the right thing to do!"
Eric Coleman	US	2019-06-27	"Keep public lands public"
Joshua Imig	Paso Robles, CA	2019-06-27	"I love the dunes, my family has loved the dunes for generations."
Jon Burgstrom	san jose, CA	2019-06-27	"Keep our public lands open for all of us! Hikers, bikers, miners, fishermen, hunters, people that go outside, everyone must unite for this cause. Road and land closures have been going on for way to long. Over regulation from special interest environmental groups affecting OUR public land access must stop or we won't be able to enjoy the outdoors."
Danna Moore	US	2019-06-27	"I'm signing this petition because as a child my family would go to Oceano Dunes every year for vacation. It was a place to have fun and relax. Now, you are trying to take that away from everyone."
Hunter Andrews	Morongo Valley, CA	2019-06-27	"I've been going there for 21 years"
Taylor Tobler	Napa, CA	2019-06-27	"The taxes, registration and camping fees pay to keep these places open. How much do the bird watchers contribute?"

Name	Location	Date	Comment
Patricia Cooper	Fremont, CA	2019-06-27	"I believe we need to keep open"
Collin Wiseman	Los Osos, CA	2019-06-27	"Freedom"
Jeff Judd	Grover Beach, CA	2019-06-27	"Recreation on the dunes is why we live here. I want my kids to enjoy them. It's what we're known for."
Sal dominguez	Rancho Cucamonga, CA	2019-06-27	"It's a great place for families to enjoy ridding and camp out."
Thomas Ogle	Calimesa, CA	2019-06-27	"It needs to be open"
Lorena Moreno	Lancaster, CA	2019-06-27	"Let's keep it open"
Lisa Blevins	Granite Bay, CA	2019-06-27	"stop the elite land grab"
Jason Hardenbrook	Tehachapi, CA	2019-06-27	"Keep our off road areas open! Don't like the dust? MOVE! The Dunes were there before you"
James Brooks	Houston, TX	2019-06-27	"OHV areas are already limited as it is and they keep dwindling for no apparent reason other than legislators(who definitely have nothing to do with OHV's) see no point in keeping these areas accessible to the people."
Kristin Borba	Nipomo, CA	2019-06-27	"This will effect the 5 cities economy!!! Why ruin it?!"
Rikki Nelson	US	2019-06-27	"Where I grew ."
Karlton Durkee	Glendale, AZ	2019-06-27	"I enjoy exploring and off road adventures, If you limit or close access to land, it prevents young folks from learning about our country and its lands and enjoying our rights to a free country"
Danny Gilligan	Borehamwood, England, UK	2019-06-27	"We come all the way from Europe to ride these dunes Shame if they disappear"
Scott Davis	Thousand Oaks, CA	2019-06-27	"Don't take away our FREEDOM!!"
Pamela Simpkins	Los Angeles, CA	2019-06-27	"My family uses this beautiful park. Would love for my grandchildren to take their families there"
Debbie DeGarmo	Coquille, OR	2019-06-27	"I'm a California native, what happened to the taxes imposed on us for ohv fees to pay for and protect riding areas, yes as usual California politicians spent it elsewhere. Keep the areas open for riding, period."
kyle goldie	Riverside, CA	2019-06-27	"KyleGoldie"
Shirley Boothe	Clayton, NM	2019-06-27	"Shirley Boothe"
Donette Popylisen	Hollister, CA	2019-06-27	"I love the beach and I love to camp and ride there too! My family & I have had many, many vacations at Oceano. We've even got many of our neighbors hooked on Oceano. Please, please keep it open to the public! You've already reclaimed many miles of it over the past 4 decades. We were already bummed about the shrinking space."

Name	Location	Date	Comment
KATHY TATICK	LOMPOC, CA	2019-06-27	"I am tired of losing beach access"
Baylee Krumm	Merced, CA	2019-06-27	"I grew up going to Pismo dunes"
Scott Martin	Quail Valley, CA	2019-06-27	"98 % of the coast is already restricted from off road use ,leave this park opens shame on anyone that would consider closing in the financial harm to the town would be great and people have been using this beachfront for many generations ,the coastal commission should take a class in financial economics and consider the people of the state once in a while. Scott"
Jami Rodriguez	Gonzales, CA	2019-06-27	"This is just not right, why take everything away that is fun. People just need to have more respect, and clean up after themselves and ride safely, use Common sense"
Joshua Durrett	Sacramento, US	2019-06-27	"This is public land and places me, family and friends get to spend time and do what we love. Don't take that away from us."
Michael Cano	Manteca, CA	2019-06-27	"It's a fun place for a family to go!"
Pat Holland	Mammoth Lakes, CA	2019-06-27	"Pat Holland"
ERIC smith	san luis obisbo, CA	2019-06-27	"It's important to keep this area open to off road vehicles."
Christian Anguiano	San Jose, CA	2019-06-27	"Its been open for years"
April Willcut	Bakersfield, CA	2019-06-27	"I love pismo"
Sierra Alcala	Los Angeles, CA	2019-06-27	"One of the only coastal areas for offroad use, don't take it away. Not to mention the huge impact this will have on the local economy."
Odilia Goulart	San Jose, CA	2019-06-27	"I love the Dunes, keep them open"
Daniel hernandez	Bellflower, CA	2019-06-27	"This is a great place for family and friends"
Kitt Krumm	Atwater, CA	2019-06-27	"My family and I have been going to the dunes for more than 50 years and I would like to continue the tradition with my grandson."
Forrest Hewett	Placerville, CA	2019-06-27	"My family friends and I all enjoy camping there and exploring the neighboring city's. I feel that closing this to ohv use would be a financial disaster for the area."
Matt Bsbbitt	Southfield, MI	2019-06-27	"I have been to the dunes all my life and still love to go"
Preston Scharf	oceano, CA	2019-06-27	"It should not be closed"
Gina Wheeler	Bakersfield, CA	2019-06-27	"The dunes are a great family outing for everyone !"
Esmeralda Garza	Citrus Heights, US	2019-06-27	"Esmeralda Garza"

Name	Location	Date	Comment
Marlene tynon	Arroyo Grande, CA	2019-06-27	"We live by the beach and my grandkids go there every week with there dad one person has to ruin it for everyone else arrest those people and let everyone else enjoy themselves"
Phyllis Mansell	Walnut Creek, CA	2019-06-27	"My family loves riding the dunes"
Debbie Burgos	Las Vegas, NV	2019-06-27	"Outdoor recreation is vitally important to our economy, but more important, this particular area provides an opportunity for everyone, no matter what their physical challenge may be to experience the healing of being in and near the ocean. Please do not let them close this!"
James Ransome	Santa Maria, CA	2019-06-27	"Sand will blow in the wind, its not the off roaders, it's the cutting down of the trees and wind breaks to build more homes for people that then complain about dust"
Evan pargett	Concord, CA	2019-06-27	"We can not lose our riding and camping areas we already have to travel so far to legally ride our ohv and it's not right"
Gail Pratt	Auburn, AL	2019-06-27	"My step-son asked me to!"
Mike Rogers	Windsor, CA	2019-06-27	"It matters"
Sujey Logan	Corona, CA	2019-06-27	"These dunes have become tradition. Please dont take this away from our family and many other families out there."
Cindy Hansen	Acton, CA	2019-06-27	"I love riding and camping and we pay fees to have places like this with green tag money so that money should be spent keeping these few places that are left opened."
Austin Busby	Casa Grande, US	2019-06-27	"I'm all for keeping the dunes alive"
Jake Smith	Shaver Lake, US	2019-06-27	"The dunes is an amazing place to spend time with family and friends to go riding around or even just to camp. The dunes should not be shut down cause then the people that are working there will lose there jobs. I love riding pismo and it should never be closed down"
Jose Mendoza	US	2019-06-27	"For the homie"
Patricia Keser	Las Vegas, NV	2019-06-27	"I'm signing because the dunes are a family friendly activity and a long tradition in the area."
David Hoyt	Canyon Country, CA	2019-06-27	"We working people pay taxes on top of taxes on top of taxes to live in this state, We the people are invested in places like Pismo. Leave it alone."
Matthew Barnes	Manteca, CA	2019-06-27	"I can't imagine life without the dunes."
Gail Whiteside	Lake Isabella, CA	2019-06-27	"Gail Whiteside"
Dina Medina	Los Angeles, CA	2019-06-27	"Dina medina"

Name	Location	Date	Comment
Eli Brunius	El Dorado Hills, US	2019-06-27	"I have many great memories from Pismo. It would be sad to see it closed."
Christina Smalley	Maricopa, AZ	2019-06-27	"Please keep the Oceano Dunes alive!"
Lara Rees	Las Vegas, NV	2019-06-27	"Quit taking our land away!!! It is the people's land."
Jesse Stubblefield	San Jose, CA	2019-06-27	"Tired of the progressives taking things away from us in our state."
Zachary O'Keefe	Bakersfield, US	2019-06-27	"It's a great family environment full of lots of fun with a lifestyle of off-roading"
Amanda Torman-Kolb	Sanger, CA	2019-06-27	"I have had a lot of great camping memories and would love to pass those on to my kids like my parents and grandparents have to me."
Taylor Hoover	San Luis Obispo, CA	2019-06-27	"We can't keep expecting moto riders to find new places to go. We wonder why there are so many deaths? There's not enough area to ride! We wonder why so much illegal riding happens? Why no one stays on trails? Well when there's no where local to ride and the trails we do ride are not maintained and shrinking in size every year, we're not left with much of an option"
Elizabeth Rodriguez	US	2019-06-27	"I'm signing because it should be kept open."
Sandra Vieira	Santa Clara, CA	2019-06-27	"I've been going since a child. Just to you all know that if you close this down your town will be a ghost town"
Debbie Gatlin	Alta Loma, CA	2019-06-27	"Love to camp in Pismo!!"
Aja Castilleja	Arroyo grande, CA	2019-06-27	"I'm a local and love the beach. Our town will not be the same without having off road access."
cody feltis	Woodlake, CA	2019-06-27	"I've always went there a since I was little and I want to my son to live the experience that of the dunes and riding his atvs and so has his children in the future"
Caryn Herren	Bakersfield, CA	2019-06-27	"The best memories I have from my childhood were made here. The bonds that are built within families here are so special."
Kevin Botsford	Lake Forest, CA	2019-06-27	"Pismo rocks, don't ruin my favorite camping area"
Skyler Wanberg	Clinton Township, US	2019-06-27	"It's a beautiful area that brings so many people together! Off-roaders!!"
Karlene Zamora-Billings	US	2019-06-27	"Keep the Dunes open. There is so little outside activities that unite families. Families are important, Save the family unit!!"
Deanne Splawn	US	2019-06-27	"This is a great place to go with our family and great for the community it brings in people for the businesses"
Eileen Wise	Mariposa, US	2019-06-27	"I'm aware that this could happen to our horse riding areas as well."

Name	Location	Date	Comment
Sierra Griffin	Santa Maria, CA	2019-06-27	"The dunes mean a lot to me and my second family! I would hate to see them closed and not be able to the fun things that we have done since our childhood."
Katie Freitas	Hilmar, US	2019-06-27	"Same as below we want our rights back and I know many people that ride there and not fair for them to lose it"
James Verhague	Fullerton, CA	2019-06-27	"The dunes bring revenue to the local community businesses."
David Saucedo	Cuero, TX	2019-06-27	"David Saucedo Jr"
Marcus Miyamoto	Hinesville, US	2019-06-27	"I believe it will cripple the coast by the loss of revenue for all local businesses in the area and on the central coast it has been open for years why change it now"
Debbie Dodd	Fresno, CA	2019-06-27	"I believe in the cause!!!"
Samantha Stone	Arroyo Grande, CA	2019-06-27	"We go to the beach all the time and it is a fun place for our families"
Ron Shaw	Upland, CA	2019-06-27	" We need to reserve all rights to public land it belongs to us the taxpayers"
Chelsey Velasquez	Clovis, CA	2019-06-27	"The memories I have going to the dunes and riding my atvs enjoying family time. It would be a disservice to the community to take this away from the public due to idiots not being safe."
Christopher Williams	San Diego, US	2019-06-27	"I frequent this location and want to preserve both the OHV area and preservation protection area."
Kathi Stokes	West Sacramento, CA	2019-06-27	"This is a PUBLIC State Park, which is as taxpayers pay for the use of. We cannot continue to let the government take our freedoms away!"
Christine Stohlman Pantaleoni	US	2019-06-27	"Christine Pantaleoni"
Lisa Caouette	Norco, CA	2019-06-27	"This park belongs to us tax paying Californians, the ones that love and respect it! Closing it does nothing in the way of a positive change. There are other ways of protecting our beaches and wildlife preserve."
Salina Constant	Stockton, US	2019-06-27	"Why take away good wholesome FAMILY Fun instead of shooting people"
Christina Scott	Oakley, US	2019-06-27	"To help"
Dario Peracchi	US	2019-06-27	"Lots of great memories there don't want to see it going away"
Josh Medeiros	Carson City, US	2019-06-27	"All the local businesses would greatly be affected by this as they receive lots of revenue due to the dunes."
Bob Linder	Bakersfield, US	2019-06-27	"Freedom on Oceano"

Name	Location	Date	Comment
Corey Davis	Denton, TX	2019-06-27	"Corey E David"
Susan rusconi	Fresno, CA	2019-06-27	"This is for families. Always has been."
Brendon Hanson	Menifee, CA	2019-06-27	"Let's keep this place open, riding is a great bonding experience for families and friends. Stop taking our public lands away"
Kristopher Quick	Clovis, CA	2019-06-27	"Tired of the Democrats trying to take away all of the fun in California. We love the dunes and need a place like this to relax and have fun with our bikes."
Chantal N Rob	US	2019-06-27	"Chantal Higa"
Clifford Burgoni	Bakersfield, CA	2019-06-27	"We need the dunes."
Danielle Drake	US	2019-06-27	"i loved it the few times i went"
casey torres	Upland, CA	2019-06-27	"I want my family to have the ability to enjoy our land, camping and ohv."
JT Oswald	Tucson, AZ	2019-06-27	"I grew up in Grover Beach and always spent time in the dunes. From the times I would have beach days with my family, to the days I started to drive and would take friends, girlfriends and people from out of town to drive on the beach and enjoy the dunes. People have been enjoying that stretch of beach for generations and should be able to enjoy for many more. Stop trying to take away offroad parks from people who enjoy being outdoors."
troy daniels	Manteca, CA	2019-06-27	"Because CA is turning into a shitwhole liberal damnation of a once great state."
angelique mahan	Ventura, CA	2019-06-27	"This is a landmark for families."
Jenny Childrss	Fresno, CA	2019-06-27	"I love taking a vacation here with my family. It's always a blast"
Dean Joyner	Petaluma, CA	2019-06-27	"We need OHV recreational sites as California increases population. Any closures of any OHV areas is plain poor Business!!!!"
Monica Morrison	JBLM, US	2019-06-27	"Help us save this place that we love � #keepitopen #greatplace"
Brian Masters	San diego, CA	2019-06-27	"Responsible off road activities are a key way my family has fun together."
Jessica Munoz	Fresno, CA	2019-06-27	"I've spent years here with my family and would like to continue making more memories with my family."
Jaqueline Rojas	Round Lake, IL	2019-06-27	"Jaqueline Rojas"
Cameron Rodrigues	Stockton, CA	2019-06-27	"Don't close pismo down so many great memories familys have had out there"
Amy Martin	US	2019-06-27	"The dunes have been a staple for most of our lives is not our parents and our children."

Name	Location	Date	Comment
Colton Rice	Atascadero, CA	2019-06-27	"by shutting down the dunes I believe it's going to tank The economy in Pismo and surrounding areas"
Cliff Gerhard	San Clemente, US	2019-06-27	"Many fond memories there with family and friends. Don't do this!"
William A Stevenson	Ventura, CA	2019-06-27	"This is one of the last places in mid state that lets families camp, ride, spend time outdoors together. Only people that way to ban it are those that don't camp and ride"
Jamari Arnett	Pleasanton, CA	2019-06-27	"Jamari"
Luke Shelby	Taft, CA	2019-06-27	"Camping and riding at the Dunes has been a family tradition. Let's not let it end!"
Austin Gerlach	Temecula, CA	2019-06-27	"I use this location yearly"
Kim Loser	Yucca Valley, CA	2019-06-27	"my kids were raised here on there dirtbikes and they need an area to ride in."
Michael Baker	Ramona, CA	2019-06-27	"I love off-roading!"
Kyle Sanford	Clovis, CA	2019-06-27	"It's public land and it belongs to us.my family loves this place don't take it away"
Chris Guerriero	Gilroy, CA	2019-06-27	"Closing the Dunnes will kill the local businesses in the local area, the amount of tourists that come in to visit the dunnes and visit the local community will survey decrease. City and county revenue will also decrease due to less visitors to the area. Don't let local business owners suffer from the closure find a better solution!"
MACK MCGEARY	Santa Maria, US	2019-06-27	"If get to keep the right to camp and ride people really need to change and stop trashing the place and follow the laws!"
joel terska	Lancaster, CA	2019-06-27	"Keep it open!!"
Dana Borges	Shady Cove, OR	2019-06-27	"I used those dunes when I was younger, raised my kids there and they take their kids there now. This is a great sport for families of every age. Fresh air, commoraderie with others and teaching good sportsmanship as well as respect of the land and others. Please don't take this away."
kim wahl	Los Angeles, CA	2019-06-27	"Leave our playgrounds alonethis is "public" land!"
Sarah Smith	Fresno, CA	2019-06-27	"My family loves the dunes and we don't want to see it closed"
Pablo Momtano	Bakersfield, CA	2019-06-27	"The recreational area brings in millions of dollars to the local economy and without the oceano dunes people will go elsewhere."
David Cowan	Simi Valley, CA	2019-06-27	"I grew up camping at Pismo and I want my kids and their kids and their kids to experience what is real family time is like."
Victor Gutierrez	Santa Maria, CA	2019-06-27	"Dunes is life"
Cory Vestal	US	2019-06-27	"Because it's a great family vacation spot, I've been going there off and on for over 30 years, it's now a permanent family tradition!

Name	Location	Date	Comment
			Don't take it away from us. Charge more money to help pay for policing and clean up."
Norma Hill	Ontario, US	2019-06-27	"Love it there!"
Sarah Louise	Boise, ID	2019-06-27	"We need these places for Families to go and enjoy motor sports and the outdoors"
Dyan Mogan	Carmichael, CA	2019-06-27	"Because this place is fun for the whole family. Spent many fun times here. Many families enjoy this place with there friends and loved ones."
Amber Hale	Clovis, US	2019-06-27	"I'm signing because this is important to me"
Aaron Sanchez	Merced, CA	2019-06-27	"The kids"
Cole Steverson	Oceano, CA	2019-06-27	"Our economy needs the dunes!"
Lorena Gallo	Bakersfield, CA	2019-06-27	"We build many memories with our family here every year. Great time."
anita freitas	Denair, CA	2019-06-27	"love love this place been coming here for years with family . Tons of great memories! Please do Not shut this down"
Glenn Pfriffer	Turlock, CA	2019-06-27	"It's my favorite place to go off-roading."
Danielle Castellano	Concord, US	2019-06-27	"This is a place for families to have fun and make memories. I know me and my family/family friends have together."
Proxy Cabuag	San Jose, CA	2019-06-27	"Proxy Cabuag"
charles perham	Morgan Hill, CA	2019-06-27	"me and the family camp every year and love this place . The restaurants and stores benefit from our business."
Rebecca Mitchell	San Jose, CA	2019-06-27	"The dunes are apart of home for me I use to go all the time when I lived there I moved to Modesto so now I go a few times a year"
Carrie Patton	Sanger, CA	2019-06-27	"We love our family and friend time at the dunes. Please do not take it away from us"
Gage Comeau	Lawndale, CA	2019-06-27	"It would be a shame to see this place closed!"
Miles Nelson	Lake Havasu City, AZ	2019-06-27	"Because that where else can this happen?"
Krystal Appiano	Morro Bay, CA	2019-06-27	"We have a business that could be drastically affected by the loss of tourism."
Eric Stenstrup	Oconto, WI	2019-06-27	"I enjoy the sport of utving and we plan family trips out there. We spend anywhere from a thousand to five thousand dollars at local businesses when we stay out there"
Mike Seaman	Porterville, US	2019-06-27	"I feel this OHV riding area should remain open."
Amy Daniels	Auburn, CA	2019-06-27	"This should not be closed"

Name	Location	Date	Comment
Ashley Homan	Hollister, US	2019-06-27	"My family consists of a large group of OHV enthusiasts and it's so unfair to see the state wanting to shut down something's that brings so many families together."
Janae Hennings	Dubuque, US	2019-06-27	"I"
Don DeAzevedo	Fort Lauderdale, FL	2019-06-27	"It's part of our family history, past and future."
Michael Archibald	San Marcos, CA	2019-06-27	"I love it there, it's the Only place in all of our huge California coast line that we can still drive on the beach. It's beautiful and amazing to be able to drive there."
Stephen Lee	US	2019-06-27	"Because I don't believe we should shut down a perfect get away for families. Also it would be a catastrophic loss of revenue to oceano inn Pismo and surrounding five cities. The reason that the activists want to shut this place down is because of the bird but the bird rest in the bushes where you can't ride. Its biggest threat is a feral cat start there"
Tre Rea	Morro Bay, CA	2019-06-27	"."
Dre King	Turlock, CA	2019-06-27	"This has been a family place for 25+ years! Shutting down Oceano dunes would be detrimental to the economy! Everybody enjoys coming here from all over the states!"
Brandi Janke	San Leandro, CA	2019-06-27	"This is lame #dunebugforlife"
Donny Longfellow	Pico Rivera, CA	2019-06-27	"Donny longfellow"
Kennith Reed	National city, US	2019-06-27	"My family go here every year for our escapes from corporate life! Please don't take away our freedom!"
Michelle Phillips	Pinon Hills, CA	2019-06-27	"Please keep this beautiful area open for the off roaring community. It's the only place like it for us."
Tom Stevens	Placerville, US	2019-06-27	"Have been there a lot over my life and would like to go again!"
barbara whitfield	porterville, CA	2019-06-27	"This is a family mini-vacation destination that needs to be saved AS IT IS."
Cesar Camberos	Santa Ana, CA	2019-06-27	"It's home to a lot of people"
tammy egler	Big Bear Lake, CA	2019-06-27	"Cmpung is awesome"
hugo morales	Fresno, CA	2019-06-27	"I need to ride at the dunes"
Melissa Aguirre	Fresno, CA	2019-06-27	"Melissa Aguirre"
Alez Hernandez-Jordan	Colorado Springs, CO	2019-06-27	"I'm signing because I love Tricia and Deagan and I've been wanting to go here for years"
Danielle Miller	Sunnyvale, CA	2019-06-27	"Families deserve a place to camp and enjoy the dunes together, where everyone is welcome!"

Name	Location	Date	Comment
James Higgins	Santa Barbara, CA	2019-06-27	"This has been a destination place for thousands of people for years. Stop letting California take away our freedoms!!!!"
Cristy Flynn	Menifee, CA	2019-06-27	"This is a great place to go with family. In the world today it's so important for families to do things together and thus place has been a joy for families for years."
Susan Crowley	Riverside, CA	2019-06-27	"We need beautiful places to enjoy with our families."
Barton Pearson	Oceano, CA	2019-06-27	"Economic impact will be great for the area to survive. Businesses will move or go out of business. The 5 Cities is already going to be impacted by the closure of Diablo Canyon. We do not need anymore economic impacts to the area."
Frank Alioto	Redondo Beach, CA	2019-06-27	"Pismo is a California treasure. Keeping it accessible should be a major goal of the Coastal Commission. As a wheelchair user it is my most frequently used beach."
Erika Vandermeer	Tulare, US	2019-06-27	"We enjoy camping and riding at the dunes"
Paul Sanders	mountain view, CA	2019-06-27	"I believe in Liberty!"
Ashley Darby	Fresno, CA	2019-06-27	"I love the dunes"
Sidney Miller	Atwater, US	2019-06-27	"I have had so many great memories and I would be tremendously broken if this got taken away from more great times, not only for me but for others as well."
Rod Nickels	National City, CA	2019-06-27	"I've been to Pismo dunes all of my life. Awesome memories beautiful beach and we always leave the dunes cleaner then when we got there. Keep Pismo open!!!"
Dick Cressy	Yucca Valley, CA	2019-06-27	"We need more recreational parks on the beaches"
Caitlin Abrott	Oakley, CA	2019-06-27	"The Dunes was my favorite thing to do"
John King	Hesperia, CA	2019-06-27	"The dunes is where we show our kids how to unplug and get into nature."
Sally Dominguez	Los Angeles, CA	2019-06-27	"Keep the dunes open, it's part of innocent fun to be had by many kids and young adults to share with their parents and friends."
Cruz Rios	Long Beach, CA	2019-06-27	"Cruzrios"
Stacy Hernandez	Nipomo, CA	2019-06-27	"Closing The Dunes Will Impact ALOT Of Us Who Enjoy Our Beautiful Coast."
Anthony Alvarez	Fresno, CA	2019-06-27	"The dunes is a cool place to ride and enjoy the beach"
Randy Bennett	Apple Valley, CA	2019-06-27	"This is a fun place to go too and just camp and relax. I feel that a million more people will agree."
glenn clabeaux	lemoore, US	2019-06-27	"ok"

Name	Location	Date	Comment
Brenda Grilli	Sonora, CA	2019-06-27	"I'm signing because I grew up spending my summers at Pismo beach riding dune buggies! Even celebrated my 21st Birthday at the little bar that use to be there on the beach殺 I loved my time there and want others to enjoy it too!"
Jamie Pelham	Kingman, AZ	2019-06-27	"I am signing because I think the need to keep the Dunes open."
Kim French	Oakdale, US	2019-06-27	"I loved going to Oceano Dunes - it's great for families."
Kimberly Hartmark	Sacramento, CA	2019-06-27	"Kimhartmark"
Douglas Orchard	Valencia, US	2019-06-27	"We need to open up more of Pismo, like it was 30 years ago! It's our beach too."
Amy Mulligan	Tehachapi, CA	2019-06-27	"Because this is our land"
Tyrell Wales	Lafayette, TN	2019-06-27	"Go go Frank the Tank!!!!"
david gouker	Castroville, CA	2019-06-27	"I ride"
Kyle Wolden	Shingle Springs, US	2019-06-27	"Kyle Wolden"
Linda Wooten	Fresno, CA	2019-06-27	"I enjoy camping in Pismo and if they were to close Oceano Dunes State Park, the area's economy would greatly suffer."
Trevor Wise	Fresno, CA	2019-06-27	"I love all California OHV and love having a place to ride"
Erick Zuniga	Linden, CA	2019-06-27	"its a place that i like to bring the family to have fun on the beach and for me to get my stress out on my atv to have fun"
Kirk McMorris	Sacramento, CA	2019-06-27	"We need more recreational area, not fewer."
Shea diaz	Oxnard, CA	2019-06-27	"This has been a family destination for me and my family for over 20 years. As it is there is not many safe locations where we can gather and enjoy our off road vehicles and get together around the bon fire on the beach to share stories and memory's. With Pismo beach being shut down it's one less opportunity to spend time with my family and I can only imagine what the cost impact will be on the city as we have spent thousands of dollars in the city from gas fill ups to grocery's dinning and visiting the local family owned shops especially the salt water taffy. Please consider the family business that will have to shut down and how many family's will be disappointed in not being able to visit or even know about this beautiful location.Regards -Shea M Diaz"
Eddie Phillips	Big Bear, CA	2019-06-27	"Keep Pismo beach open to motorized recreation. Edwin phillips"
Maria Barbosa	Paradise, CA	2019-06-27	"Keep the dunes open to the public"
Ashley Huber	Tracy, CA	2019-06-27	"I love coming to pismo and would do anything to keep it open so I can raise my son coming here!"
Tina Gehrer	Citrus Heights, CA	2019-06-27	"We need to preserve for future generation."

Name	Location	Date	Comment
Shasta Odbert	Yreka, CA	2019-06-27	"I supporte the keeping Oceano Dunes SVRA open."
Ian Thompson	Monroe, WA	2019-06-27	"To keep people outside and having good fun."
Bob Dority	Moreno valley, CA	2019-06-27	"Family traditions lost. �"
Cheryl Imel	Rogue River, OR	2019-06-27	"Why would you want to take something good away from the public. Let the people continue to make memories with their family's at a place they have grown to love."
Guillermo Reynoso	Sylmar, CA	2019-06-27	"Let's keep this place open and help keep it clean when you go camping here"
Ron Morrison	Lompoc, CA	2019-06-27	"Ron morrison"
Amy Storlie	Morgan Hill, CA	2019-06-27	"I have 44 years of great memories here! We always treated the dunes with the utmost respect and our children deserve these same experiences!"
Andy Harris	San Ramon, CA	2019-06-27	"The Oceano Dunes creates a good clean fun place for friends and family"
Timothy Zehm	Mission Viejo, US	2019-06-27	"This place has many of my childhood memories of amazing times with my family that I had hoped to pass on to my kids. Please dont take that away from me and thousands of other families."
Tim Fish	Napa, US	2019-06-27	"Save are ohv parks"
Gonifasio Tello	Concord, CA	2019-06-27	"We take our families there every year to enjoy the riding and nice weather"
nichole saralegui	covina, CA	2019-06-27	"Our family loves the dunes we get away from stress, cell phones and come together for a few days out of the year together."
Roger Munoz	Madera, CA	2019-06-27	"My kids love this place love riding there quads up and down the beach and love camping in front of the ocean �"
Shellie Lowetz	Truckee, US	2019-06-27	"This is an awesome place and to have yet another right taken away by closing our public places is unacceptable."
Mike Sanders	Alpena, MI	2019-06-27	"It's public lands, leave it open"
juan silva	Lompoc, CA	2019-06-27	"Would like to protect our rights"
Tonia Mitchell	Tallahassee, FL	2019-06-27	"We drive from Florida to ride and enjoy the dunes."
Holly Lewis	Linden, CA	2019-06-27	"My boyfriend grew up going to the dunes with his family and is so excited to be able to pass that down to our girls Don't take away family tradition and good memories"
Tamara Paulson	San Jose, CA	2019-06-27	"Tamara Paulson"
Hailey Ladrigan	Terra bella, CA	2019-06-27	"i'm signing this because I have always gone to the dunes growing up to ride quads and I would be sad if it was closed"

Name	Location	Date	Comment
joshua meadows	torrance, CA	2019-06-27	"They're making a huge mistake. MASSIVE. Goodbye Pismo is this happens"
Adam Golling	Clovis, CA	2019-06-27	"CALL to ACTION CALL to ACTIONThe Coastal Commission is about to ruin your Holidays at the Oceano Dunes. Summer vacations will be taking a big hit too!If you have camping reservations for Thanksgiving and/or New Year's or ANY time after July 11th 2019 at the ODSVRA I suggest you make a back-up plan. 300 camping reservations will be taken away starting July 11, 2019. That's right 300 campers will have to stay home. Who's going to give up their reservation?Of course all of this is subject to being able to cross the creek. Once the creek is flowing to the ocean, camping will be halted. At least the 700 who make it across the creek will get a quiet night's sleep since night riding will be prohibited. The Coastal Commission wants to:"Users are not allowed to the southern side of the creek area when the creek may soon connect to the ocean""700 camping units per night as of July 11, 2019""All vehicular and OHV activity within ODSVRA shall be prohibited during nighttime hours (i.e., from one-ho"
Shawn Hodges	Newark, CA	2019-06-27	"Visiting Oceano Dunes has been a family tradition for us. Please don't take away our little slice of paradise!"
Cristy Summers	Glendale, US	2019-06-27	"Cristy Summers"
Adam Golling	Clovis, CA	2019-06-27	"Please We need as many people you know who can make it to this meet to show up. Please spread the work to with anyone local or who can travel to this meeting. Attend the Coastal Commission and speak upThis one is important Date: Thursday, July 11th Time: 9 am (show up early) Location: Embassy Suites Hotel 333 Madonna Road, San Luis Obispo, CA 93405"
Stephanie Jones	Hermiston, OR	2019-06-27	"We love going out the the dunes and would hate to see them close!"
Gwen Ogle	Scottsdale, AZ	2019-06-27	"Gwen Ogle"
john dolcini	Placerville, CA	2019-06-27	"Environmental groups are taking away our freedoms."
Eddie Meyer	Vacaville, CA	2019-06-27	"Save the only little bit of actual freedom we have."
Ben Conley	Oregon City, US	2019-06-27	"Ben Conley"
Cheri Davis	Madera, CA	2019-06-27	"Have enjoyed riding there since I was a kid."
Greg Farnam	Turlock, CA	2019-06-27	"I am an oh enthusiast"
Greg Neville	Encinitas, CA	2019-06-27	"There is no good reason to shutdown such a remarkable offroading area. not only will this remove revenue from a town that really needs it, it will be another strike against California as an attractant to outdoor enthusiasts"
Evan Cloud	Canoga Park, CA	2019-06-27	"I love riding and camping here"
Anthony Gonzales	Fresno, CA	2019-06-27	"I want to ride!!!!"

Name	Location	Date	Comment
Doug nahale	Fremont, CA	2019-06-27	"Doug Nahale this a great family spot"
Mary Holman	San Pedro, CA	2019-06-27	"Closure is unnecessary"
Monica Nunez	Rancho Cucamonga, US	2019-06-27	"A family that Rides and Campd together, stays together!!! Let's Ride!!!!"
David Schneider	Silverton, OR	2019-06-27	"I am seeing too many of out PUBLIC places closed to the public. This is a recreation we should not be losing. This will cause an economic impact on many business."
Brian Silva	Hilmar, CA	2019-06-27	"Great place to ride and camp long time traditions coming here and seeing amazing views so so so much enjoyment"
Patrick Culver	Paso Robles, CA	2019-06-27	"Patrick Culver"
Roger Brown	Bakersfield, US	2019-06-27	"Only place to drive on the beach in California. Besides it belongs to the people"
Leslie Nelson	Isanti, MN	2019-06-27	"I'm from SLO. I've enjoyed these dunes most of my life. Don't close the dunes. The people complaining about the dunes obviously aren't native to SLO county. They move in knowing full well these dunes are a public attraction for millions of people. They don't like it sell and move back to where they came from."
Melanie Demkey	Bakersfield, CA	2019-06-27	"Keep this open for the citizens."
Gary Russell	Chelsea, MA	2019-06-27	"I have tons of memories with family and friend"
Blake Mcclung	US	2019-06-27	"I love to camp and to experience the fun there in the dunes. I bought a truck with 4x4 just so I'd be able to go camping out in the dunes."
Frank Chimienti	Fresno, CA	2019-06-27	"Dunes have been a staple for the Central Coast"
Matthew Connolly	Lodi, CA	2019-06-27	"Many people use this recreational place"
Lisa Brown	Sparks, NV	2019-06-27	"Some of the best memories of my childhood are here. I would like my children to experience the same. Also, I can't imagine the devastating impact this will have on the local economy."
Nathan Holland	Rancho Cordova, CA	2019-06-27	"Keep public lands open for the public! Oceano is one of the only beaches in California you can still drive on."
Gina Yacopetti	Tehachapi, US	2019-06-27	"We Love camping and riding on the dunes,making family Memories.Enjoy the weather and good place to eat and shop.Pismo would take a very hard hit with people not coming to dunes , Would hurt a lot of businesses there. Would be a very SAD to close dunes."
Richard Nunez	Foothill Ranch, CA	2019-06-27	"There are few too many places to camp and enjoy ATVs in this state!"
Sherry Case	Minot, ND	2019-06-27	"It's hard enough finding places to take a family for off roading vacations, without the state stepping in and removing them. It's

Name	Location	Date	Comment
			important to make our desires heard. They work for us, make them do so."
Vicki Kitchell	San Carlos, CA	2019-06-27	"Vicki Kitchell"
zach morris	clovis, CA	2019-06-27	"Fuck u libs"
Ryan McCarthy	Carlsbad, CA	2019-06-27	"Damn liberals. Ruining all the fun"
Dave Wall	Schanzenfeld, Canada	2019-06-27	"It's the right thing to do"
Jesse Hutson	Apple Valley, US	2019-06-27	"Leave our riding areas alone!"
Lorryn Gearhart	Salt Lake City, UT	2019-06-27	"Because i want it protected"
Steve Balding	North Hollywood, CA	2019-06-27	"Where are there so few places nowadays to off-road we cannot keep losing themit's a genuine sport that the publican thoroughly enjoysKeep our off-road areas open!!!!"
Daniel Wreesman	Ventura, CA	2019-06-27	"This area supports so much family bonding and development of children its unreal. Closing this area to recreation would be a travesty. Not only that but a huge cut in revenue to the area. So many businesses thrive because of the visitors to the dunes. Please use common sens and keep this are alive."
Vanessa Rojas	Porterville, CA	2019-06-27	"Save the dunes my dude"
Adam Cameron	Clovis, CA	2019-06-27	"You're hurting people's feelings closing it down, it is a great past time and way of fun for many"
Jeffery Longoria	Apple Valley, CA	2019-06-27	"Quit taking away our dedicated places to have offroad fun."
Geni Robinson	Paradise, CA	2019-06-27	"I love the dunes. There is no reason to visit if it's not an OHV Park that you can camp at. There are plenty of other beaches much closer."
julie spielman	gainesville, GA	2019-06-27	"Having been born and raised in California when I return home this is one of the first place o head to with my family! It's a safe place to be"
Daniel Macias	Oakland, CA	2019-06-27	"Let's us have fun!"
Griselda Mariscal Gonzalez	Stockton, CA	2019-06-27	"This is a great place to bring the family disconnect our teens from there phones and have some fun. For the last 7 year i have been coming every year with my family and it's an amazing place!"
Chanelle Twitchell	Show Low, AZ	2019-06-27	"I love the dunes!!"
Josh Peacock	Carmichael, CA	2019-06-27	"Keep it open or let people ride on the streets"
Fern Facchino	Ah, CA	2019-06-27	"The Coastal Commission has way too much power and none are voted on by State of CA - power hungry people is all!!!!!"
Joan McCoy	Lincoln, CA	2019-06-27	"It's important to keep Pismo Dunes!"

Name	Location	Date	Comment
Melissa Fulfer	sonora, CA	2019-06-27	"I'm signing because I grew up riding quads on that beach. It was a second home for me and my family. So many memories and friends were made while camping there. And I would truly to see this get shut down because my kids have yet to experience it"
Juan Rojas	Lemoore, US	2019-06-27	"Keep it or let people ride on the streets!!!#�#�#�"
Heather DePratti	Royal Oaks, CA, CA	2019-06-27	"This is what makes Pismo and an oasis for us all in multiple counties!"
Richard Forgerson	La Habra, US	2019-06-27	"One of the only beaches for this type of fun, it would be dumb to close it look how many places get business because of the events and amount of people passing through or staying for the fun."
Michelle Brazell	Cathedral City, CA	2019-06-27	"This is a place where families can still make lasting, lifelong memories for their children and their children's, children! Shutting it down will only cause these families to go elsewhere with their fun! Please CA don't ruin this too!"
Lew Swan	Gresham, OR	2019-06-27	"I enjoy our right to use the dunes responsibly"
Lydia Padilla	US	2019-06-27	"That is where we spent our summers as kids and now as adults I would hate for my kids to not be able to have the option to make the same memories with their kids."
Shirley Bryant	Sealy, TX	2019-06-27	"Our family loves visiting the dunes at oceano, riding our quads and Jeep there and camping, it's good wholesome family fun."
julia villarta	Salinas, CA	2019-06-27	"Keep it open"
Kennedy Farinad	Bakersfield, CA	2019-06-27	"This is the way of life and some people turn professional moto riding theses dunes"
Kyle Johnson	Whitehall, MI	2019-06-27	"The dunes is one of the best things I get to go do. Can't image what would happen if my dunes got shut down."
Micah Anderson	Alpine, CA	2019-06-27	"The Public demands the public lands stay open for public use."
Cody Lebeau	Modesto, CA	2019-06-27	"I'm signing because the dunes mean alot to my family and I, my parents grew up going and then had kids which are me and my brother who now go on our own and plan on having kids soon and having them grow up in the dunes as well and let the generations continue to love and have fun at this beautiful place."
Mitchell Young	Visalia, CA	2019-06-27	"This has been an OHV area for years and environmentalists are way out of control!! Imagine the revenue lost if it closes!!"
Ken Hale	San Joaquin, CA	2019-06-27	"Ken Hale"
Nick Adkison	Lake Havasu City, AZ	2019-06-27	"We need areas like this to stay open for people to stay out of trouble"
Joseph Zehnick	Kingston, NY	2019-06-27	"Because I ride there!!!"

Name	Location	Date	Comment
Baldo Hernandez	US	2019-06-27	"I want the oceano dunes to remain open"
Wesley Fenton	Lakeside, CA	2019-06-27	"Pismo is such a great time and my family has so many memories from this place! HARD NO on a shutdown!!!"
Cheryl Cartright	Apache Junction, AZ	2019-06-27	"It's important to families and there ti.e together."
Bill DiCeglie	US	2019-06-27	"It's the people's land to use."
Mark Ward	Santa Maria, CA	2019-06-27	"It would be financially devastating for the area if the dunes were closed to off road vehicle recreation"
Robert Pierce	Los Angeles, CA	2019-06-27	"Love to take the family out there and enjoy the different type of off road vehicles"
Brittani Villa	Bakersfield, CA	2019-06-27	"Great place to get away"
Krystal Ramage	US	2019-06-27	"We love the dunes"
Logan Fisher	Visalia, US	2019-06-27	"The dunes are such an awesome llace to check out and i dont want to see the coast line yhere become ghost towns because less people will visit"
Josh Sinclair	Tempe, AZ	2019-06-27	"Brap brap"
Kolton Kauffroath	Sacramento, CA	2019-06-27	"I'm sighing because this is bullshit"
Thomas Kerr	Auburn, CA	2019-06-27	"OHV parks on beaches are scarce and it is a destination for the surrounding community."
David Gonzalez	Horizon City, US	2019-06-27	"Supporting fellow riders, let them have a place to make memories and a place to have a great time."
Brett Kieke	Bakersfield, US	2019-06-27	"Fight the far left agenda!"
Brandon Keyarts	San Jose, CA	2019-06-27	"It would be a travesty to the economy and experience of California to cut off access to Oceano Dunes."
Sean Delk	Fresno, CA	2019-06-27	"This is bull shit"
Jennifer Simmons	Brookland, AR	2019-06-27	"The beach should not be closed. California has gone crazy!"
maria bale	Broken Arrow, OK	2019-06-27	"Maria Rivera-Bale"
Mike Ostlund	Lodi, US	2019-06-27	"Camping & riding at Oceano Dunes has become a yearly family tradition. Our family has been going to the dunes for the past 15 years. Not being able to go to the dunes is unthinkable. We need to keep the dunes open to ALL uses. Not everyone understands what the dunes mean to the families like ours who have been camping & riding there for years. Closure would be devastating to the local economy as well. Keep the dunes OPEN!!!"

Name	Location	Date	Comment
Ryan Evans	Unknown., CA	2019-06-27	"Just started a family of my own. I could not imagine my childhood without this place!"
Clarence Dold	Santa Rosa, CA	2019-06-27	"https://www.google.com/amp/s/amp.sanluisobispo.com/news/local/envi Parks Commission has a better plan."
Clarence Dold	Santa Rosa, CA	2019-06-27	"https://www.google.com/amp/s/amp.sanluisobispo.com/news/local/envi Parks Commission has a better plan."
Gina Gooding	Simi Valley, US	2019-06-27	"The government doesn't need to take away yet another place/activity that keep families making memories! They need to get rid of the rental stations only! There's NO way people who aren't regular riders should be renting quads and riding in Pismo. Rentals are for vacations on flat beach excursions with a guide! I can't even tell you how mad it makes me that they are allowing rental stations!!! And ANYONE who loves riding and Pismo would/should be against rentals! It's what is causing most of the problems, over crowded dunes and accidents. I mean really! Being FOR rental stations mean you're just asking to have the dunes shut down!!!!! Offer a compromise, get rid of the rentals, reduce the people and increase safety!"
Amy Fedalizo	Independence, MO	2019-06-27	"Be cUse I grew up going there with family, even tho I live out of state now. I still go there when I visit family"
Debbie Hunt	Marshfield, MO	2019-06-27	"Keep the land open for camping."
Candice Montano	Tulare, CA	2019-06-27	"This is the only place I've ever camped and actually loved going to. My kiddos love it and I would hate not being able to go anymore."
Jasen Friedle	San Luis Obispo, CA	2019-06-27	"Shutting this site down is gonna hurt the local economy, and remove a popular location for people ride and enjoy OHVs."
Eron Norris	Vacaville, CA	2019-06-27	"We need to keep public lands public! This beach OHV Park needs to remain available to the off road community! Closing access only pushes people to other areas, where actual damage may occur. A sensible use plan should be developed, such as operating hours, etc."
Misty Timmerman	Oakdale ca, US	2019-06-27	"Soooo sad please people wake up and let's stop California from being taken over !!!! It once was a great state. Pismo has been in our family for generations !!!!"
Timothy Zimprich	Placentia, US	2019-06-27	"Please keep dunes open"
Debi Mooney	Yucaipa, CA	2019-06-27	"Debi and Phil Mooney"
dave sweatt	tuolumne, CA	2019-06-27	"Keep public lands open to the public"
James Ceist	Los Angeles, US	2019-06-27	"This is ridiculous we don't need a development we need recreational area!"
Isaiah Garcia	Visalia, US	2019-06-27	"This so bull shit"
Nathalie Calderon	US	2019-06-27	"Nathalie calderon"

Name	Location	Date	Comment
Matt Piper	Grover beach, US	2019-06-27	"Need to keep them open. It brings A LOT of income to the surrounding cities that they benefit greatly from."
Parley Barlow	US	2019-06-27	"I wanna ride"
Mary Hughes	Coarsegold, CA	2019-06-27	"I'm signing this petition because every year my family goes to the dunes for our family reunion. We make alot of good memories and eat alot of great food. It's the only time of year that we all get together. Please don't take that away from us."
Mary Culver	Paso Robles, CA	2019-06-27	"I think we should be able to use the dunes for recreational use."
Brock Randolph	Sparks, NV	2019-06-27	"Leave our lands alone"
Michael Pereira	Hanford, CA	2019-06-27	"Im signing Because i have been going to this beach all my life since 1989 and my parents were also always there since the 70s. This beach brings so much joy too families and money into our community"
Summer Rea	Kingsburg, CA	2019-06-27	"My family used to go all the time and it was so much! Now that one my uncles passed away we hardly go. My other uncle has been wanting to fix up the Dune Buggy and get back out there and he's thinking about doing that real soon. Please don't close up the dunes, it's a fun place for everyone who goes there."
Bobby Jones	Roseville, CA	2019-06-27	"I often ride and respect the trails I also pack out what I pack in"
Amanda Romero	Dilley, TX	2019-06-27	"My family goes their to enjoy family time"
Dylan Jud	Morgan hill, CA	2019-06-27	"Pismo has been a long lasting good times with family and friends"
Jonathan McDonald	US	2019-06-27	"Why not, closing this thing has absolutely zero sense to it. It has significant value to it and the family vacations that are spent there have hardly, if any impact on nature."
Susan burkett	La Grange, CA	2019-06-27	"Susan Burkett"
Robert Hinds	Erie, PA	2019-06-27	"Open places to ride need to be around!"
Amylisa Galvan	Livermore, US	2019-06-27	"Let us ride!"
Duncan Lancaster	Waterloo, US	2019-06-27	"Love for the desert"
lisa Graves	Hamilton, OH	2019-06-27	"Lisa Graves"
Christian Cazares	Galt, CA	2019-06-27	"Sweg"
Cassidy Rozanek	Quail Valley, CA	2019-06-27	"Pismo is my favorite place. I've gone here every year since I was a kid and it holds a special place in my heart."
joe frasure	Laughlin, NV	2019-06-27	"This area is important to me"
Karina Hernandez	Burbank, CA	2019-06-27	"It's been our most favorite family gathering for the last decade. Our children have grown loving Pismo Dunes."

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Jay Delosreyes	Lake Stevens, WA	2019-06-27	"It's the right thing to do"
Michelle Jones	Bohemia, NY	2019-06-27	"Pizmo beach is amazing place to spend time with your family and friends. Leave it alone"
Christine ridens	Fairfield, CA	2019-06-27	"I love it there"
John Simon	Ada, OH	2019-06-27	"This place like many other dude areas and beach areas are great for a family quality time. It would be a shame to take that away from so many families that enjoy that recreation."
Michelle Papasergia	Bakersfield, US	2019-06-27	"Our family has loved camping and quading on the dunes!"
Kevin Nelson	Lexington, US	2019-06-27	"Supporting my friend."
Richard Azhocar Jr	Chula Vista, US	2019-06-27	"We need places like this to roam free from and over populated areas to break loose and get away."
Randy Bennett	Apple valley, US	2019-06-27	"Let's keep our camping and riding areas open"
Karrie Rathjen	Hitchcock, SD	2019-06-27	"It's necessary �"
Laure Layton	Stockton, US	2019-06-27	"My kids have always loved going to pismo with their.dad and step mom. I teach my kids to clean up after them selves so if it has to do with trash and so on at the campsitesdont take it away from families that are cautious about ocean life. Fine the people that do leave trash behind."
Rashelle Todd	Cypress, CA	2019-06-27	"Me and my family love piano beach!! It's so fun and we absolutely have a blast and it's so beautiful"
Lisa- Mills Manfredonia	US	2019-06-27	"Lisa Manfredonia- one of the best camping spots in ca."
Leslie Schmitz	Paso Robles, CA	2019-06-27	"My family and friends spend time here and enjoy it."
Alonso Renteria	Patterson, CA	2019-06-27	" I support this petition."
Taylor Owens	Kingsburg, CA	2019-06-27	"I'm signing because the dunes have been apart of my childhood and I want it around for my future kids."
Mark Silvers	Greenville, US	2019-06-27	"Done!!"
Israel Ramires	US	2019-06-27	"I'm signing because we going with kids and family enjoy together family reunion and fun all weekend it's a very good place to camping and off road place ."
Mike Bravo	Costa Mesa, CA	2019-06-27	"Hell yeah! Save the beach!"
Creig Fitzgerald	Benicia, CA	2019-06-27	"It's a great place to have fun with the family and make new friends in the process."
Victor Ross	Portland, ME	2019-06-27	"Keep Pismo open!!"

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Nelson Constantino	Union City, CA	2019-06-27	"Love this place!"
David Kehlet	Citrus Heights, US	2019-06-27	"These dunes are already heavily restricted and need to opened further, not closed completely."
charles smith	Santa Cruz, CA	2019-06-27	"I love the dunes and the family fun camping and 4 wheeling"
Gorlia Xiong	Riverside, US	2019-06-27	"My first time there a couple weeks ago! Wouldnt want to be my last!"
Cameron Dayton	Arrowbear, CA	2019-06-27	"Public lands are important"
Ryan Smith	Bakersfield, CA	2019-06-27	"I've been riding there since I was a kid and now I take my son and I hope future generations get to have the enjoyment there that we have"
Windi Walker	Corona, CA	2019-06-27	"Family fun!!! Beautiful memories!!!"
Michael Swingley	pleasant Hill, MO	2019-06-27	"Because America"
Mike Gibson	Oakdale, US	2019-06-27	"I am signing this petition because I've been there one time and I fell in love with the area. I love recreation of all sports. There are hundreds of miles of beaches that are off-limits. Oceana dunes is very small and percentage to the rest of the coastal line. To be fair the recreational lists that enjoy that area should have 50% however there's less than 1% that they can enjoy. Hopefully someday I will go back. It would be unfair for anyone to take those rights away. Signed Mike Gibson Central Valley California."
Mark Chadwell	spring Valley, CA	2019-06-27	"I'm an Off Roader and PROUD of it!"
Blake Wilbur	Fresno, CA	2019-06-27	"We want freedom"
LeRoy Miller	Huntington Beach, CA	2019-06-27	"It needs to always be open to the public."
Manna Sue	US	2019-06-27	"It's important that's why"
Misty Vasquez	visalia, CA	2019-06-27	"I want to keep them open for all to enjoy"
Eric Ragan	San Francisco, CA	2019-06-27	"I love and support the opportunity to use this land."
Cody Norman	Kern county, CA	2019-06-27	"I pay OHV tags every year and this is the only place near to ride that is OHV funded. This place is amazing and has been a huge part of so many family's for so many years"
Jamie Abeloe	Stafford, VA	2019-06-27	"Closing the dunes would negatively affect the tourist economy that the central coast has come to rely on."
keith coughlin	Wilmington, NC	2019-06-27	"My family loves to ride!! More places the better"
Bree Rocha	Riverbank, CA	2019-06-27	"I've grown up going here 4 wheeling and atv'ing here. Please don't close it. It's the closest sand dunes to where I live. So many good times and memories made here."

Name	Location	Date	Comment
Shannon Osborne	Redding, CA	2019-06-27	"We need OHV areas open for families to ride and spend time together."
Christie Cress	US	2019-06-27	"My kids have went here since they were little! Please don't close this awesome place for people to have fun!"
jay randall	Anaheim, CA	2019-06-27	"I use this area."
Will Gardner	Magna, UT	2019-06-27	"I want to camp and ride on the coast"
Debbi Rizkovsky	Newhall, CA	2019-06-27	"I want to enjoy the site as is."
John Summers	Rexburg, ID	2019-06-27	"People should be able to use public lands via motorize vehicles."
John w Youings	Melbourne, Australia	2019-06-27	"Wanting to support local riders, and I want to ride there too!"
Dennis Ladd	US	2019-06-27	"Our ohv areas are needed"
Wesley Brown	Cameron Park, CA	2019-06-27	"Keep public land open to the public!"
Jazz Strong	US	2019-06-27	"Murica!!"
Dennis Hiracheta	Atascadero, CA	2019-06-27	"It's a great getaway"
Danae Marzek	Fresno, CA	2019-06-27	"I love oceano dunes"
OCTAVIO DELAMORA	San Jose, CA	2019-06-27	"Keep it open"
Michael Walker	West Lafayette, IN	2019-06-27	"The government already has its fingers in too many of other peoples pies"
Kerrin Hovarter	Atascadero, CA	2019-06-27	"I'm signing this because it would be a HUGE LOSS to my family and community if we lost the OHV area at the Oceano Dunes/Pismo Beach."
Krystal Sessions	Paso Robles, CA	2019-06-27	"Dunes are amazing!"
Bryce Willis	Santa Maria, CA	2019-06-27	"If or when I have kids I want themTo be able to enjoy the off-road experience I did in my backyard"
Barbara Taylor	Colton, CA	2019-06-27	"I support this cause."
Krystal Sessions	Paso Robles, CA	2019-06-27	"Best memories and fun for all"
Mandy De	sun city, CA	2019-06-27	"Please keep Pismo area's Oceano Dunes legally open for family off roading and camping! there are so few places where we can group our families in this manner."
Michael McKeehan	Hesperia, US	2019-06-27	"This is a wonderful place for family's to gather and continue the long tradition of enjoying one another while riding. It is one the longest going areas that different generations have enjoyed teaching and showing their family and friends the joys of family time."

Name	Location	Date	Comment
Daniel Middleton	Visalia, CA	2019-06-27	"Place is super fun"
Cynthia Harris	Camby, US	2019-06-27	"Rob surface is one of my best friends and I hate to see him cry like a 5 year old who's mom won't get him a happy meal just for the toy�路��#"
Brent Durst	Soquel, CA	2019-06-27	"My family loves visiting and riding the dunes. It is our favorite vacation destination. We would no longer visit if riding the dunes was no longer an option."
Analisa Ramirez	Whittier, CA	2019-06-27	"It's an annual family event we like to participate in."
Patric Sutton	Ocoee, FL	2019-06-27	"The off-road life rules and must be protected. Just do not ever leave damage or garbage."
Alyssa Diaz	Moraga, CA	2019-06-27	"I used to camp and ride here as a kid and I would love to be able to take my kids there one day."
David Kirffer	Scotts Valley, CA	2019-06-27	"Pismo Dunes needs to remain open to the public! I go there with my Jeep regularly, not to mention all the businesses that will go under that depend on the dunes being open!"
Edward Rosenblat	San Francisco, CA	2019-06-27	"The dunes are a place for everyone. Only a few are out to close this place down. They are the ones that have ruined the dunes by building their homes next to a desert then complaining about the dust."
Kain Perrotta	Auburn, CA	2019-06-27	"We deserve this"
Hernan Ferraris	Daly City, CA	2019-06-27	"I like"
Dominic Ranieri	East Northport, NY	2019-06-27	"Let us ride!! Kids need places to ride."
Matthew Doyle	Shasta Lake, CA	2019-06-27	"The people of the state should not suffer due to the inability of the state to properly manage lands. We should not be punished for the governments lack of competency."
Sylvia Castaneda	US	2019-06-27	"Because who closes a beach???"
Sherry Rhodea	Valencia, CA	2019-06-27	"To support my amazing Nephew Blako!!!"
David Plouffe	La Quinta, CA	2019-06-27	"I have spent many summers here riding FUCK these environmentalists!"
Victoria Lewis	Bakersfield, CA	2019-06-27	"My son and his family have been visiting for a decade. His daughters were raised on these dunes."
Robert Barnett	US	2019-06-27	"This is one of the best family spots in California."
brad lamphiear	Simi Valley, CA	2019-06-27	"Because I enjoy riding here. Also when we go we always go into town and spend money so it brings revenue to the town as well"
Greg Pirnik	Byron, CA	2019-06-27	"Greg Pirnik"

Name	Location	Date	Comment
Arthur Sneeden	litchfield Park, AZ	2019-06-27	"I believe, I believe!!"
John Blanchfield	Plainville, US	2019-06-27	"Shutting down the dunes is a bad idea."
Joseph Curry	Bakersfield, CA	2019-06-27	"Joseph Curry I grow up there"
Angela Eavenson	Ripon, CA	2019-06-27	"My family and I love coming here during the summer for vacation! We have been coming here for over 10 years."
Matt Carroll	Fresno, CA	2019-06-27	"My family has made many life time memories and want to continue to make more."
Bob Schrempp	Palo Alto, CA	2019-06-27	"Keep the dunes open for OHV use."
Carlos Tapia	Palmdale, CA	2019-06-27	"I believe riders should have a safe place to ride. It is already hard enough to ride freely in Southern California without someone trying to press charges for trespassing without posted sign in a vast area of land. Let the riders ride my dudes"
stephen cheney	Rancho Palos Verdes, CA	2019-06-27	"I believe we have the rite to have our access"
Robert Modica	Long Beach, CA	2019-06-27	"Please keep our public lands open to all uses."
Grant Booher	Ojai, US	2019-06-27	"riders should just be able to ride where they love to ride. KEEP THIS PLACE OPEN!
David Stephens	san dimas, CA	2019-06-27	"We have to keep it open"
Nick Edwards	Marysville, CA	2019-06-27	"Nick Edwards"
Susan Bruno	Lemoore, CA	2019-06-27	"The dunes belong to those who love camping and using them"
Janeth Nunez-Galindo	US	2019-06-27	"We enjoy going camping and we would like to continue"
michael nagy	Kingman, AZ	2019-06-27	"I'm signing this because lands are getting smaller and smaller for off road use"
Linda Wilkinson	Clovis, US	2019-06-27	"Our rights are at stake"
Scott George	Bakersfield, CA	2019-06-27	"We all enjoy the dunes Pismo needs the revinew"
Mark Pretzer	Fresno, CA	2019-06-27	"Oceano Dunes has been and should continue to be a place for families to enjoy the benefits provided by the dunes, sand and ocean. There is not reasonable or logical reason for closing the dunes to the publics recreational uses."
Jose Hernandez	Salinas, CA	2019-06-27	"Save the turtles"
patricia tuter	Grover Beach, CA	2019-06-27	"Pismo state beach financially supports many state parks. The job loss will be affecting not just pismo but tax revenue brought into slo county Where the science that shows the claims of pollution etc is bad? As I know there's the science that proves otherwise"

Name	Location	Date	Comment
Nina Schmitz	Paso Robles, CA	2019-06-27	"The kids need somewhere to go family camping and ride a great connection"
Steve See	Lowell, MI	2019-06-27	"I'm a visitor and this effects me."
Zackary Brooks	Los Alamos, CA	2019-06-27	"Theres no point on closing. its one of the few things we have to do in California for fun"
Byron Arnold	Napa, CA	2019-06-27	"I have many fond memories spent camping and riding pismo dunes. Can't wait to make those memories with my kids."
Connie Brown-Myers	Oroville, CA	2019-06-27	"Special place for so many families to continue enjoying!!!"
Travis Kottwitz	Los Angeles, CA	2019-06-27	"State parks are not only to be preserved but enjoyed by the masses! Many solutions to the problems in the dunes. I don't think it's time to build walls around all our state parks but implement a different agenda. Our forest are not closed down yet tons of trash, pollution and fire hazards are left behind with the similar and different reasons."
Tim Thurston	Paso Robles, CA	2019-06-27	"For obvious reasons Americans shouldn't lose their freedoms"
Tasha Stevens	Bakersfield, CA	2019-06-27	"I love the Oceano Dunes I love spending time with my kids there and family it's a very fun place to go camping very relaxing"
Sharon Allor	Lake Havasu City, US	2019-06-27	"I used to go riding there all of the time! Such a fun place!"
Viridiana Mladosich	US	2019-06-27	"My family loves that place"
Nicole Buchanan	Santa Maria, CA	2019-06-27	"I have known him a long time and respect him and what he's standing for. We can't keep having our simple rights taken away by uptight stupid people that need to get a life."
Kristy Guardino	Glendale, AZ	2019-06-27	"This place is absolutely beautiful and we loved visiting."
Debbie Parrott	Hilmar, CA	2019-06-27	"Love pismo great family memories made"
Edward Wolfe	Orlando, US	2019-06-27	"Just cause"
Christopher Bowen	Rathdrum, ID	2019-06-27	"I have lived there 20years and it was a place where family got together keep it open"
Nick Bennett	Clovis, CA	2019-06-27	"Cause fuck you that why's"
Dale Cartier	US	2019-06-27	"I have been coming out here for years and would hate to see it go away. Please keep it open for my kids and their kids to continue the fun."
william catching	Clovis, CA	2019-06-27	"We are paying for the rights to access this land. You have no right to deny access to this land."

Name	Location	Date	Comment
Josh Iffert	Paso Robles, US	2019-06-27	"The city is going to cut their own throat if they outlaw this, revenue will drop drastically and will hurt all the small businesses in town and in surrounding towns"
Donald Darling	Whittier, CA	2019-06-27	"We need to keep responsible recreation open to the public!"
David Chadwick	Fresno, CA	2019-06-27	"America. Freedom"
Caroline Harris	Clovis, CA	2019-06-27	" It's a great and fun tradition"
Ericka Rubio	US	2019-06-27	" Most amazing please there is in California"
Josh Iffert	Paso Robles, US	2019-06-27	"I learned to drive stick at 15 on those dunes"
David Eddy	Rancho Cordova, CA	2019-06-27	"Because it was fun to Camp as a Scout and now as an adult"
Kent Specht	Clovis, CA	2019-06-27	"It's great recreation for everyone"
Steven Stuhr	Mission Viejo, CA	2019-06-27	"I am a utv rider and motor cycle rider have been my whole life and this is outrageous to close off more dunes there is no impact from us riding there and all the local businesses that thrive off of the people that's go camping at the dunes. Crazy people that dont understand."
Devin Andrews	Stigler, OK	2019-06-27	"It's where we grew up"
Quin Bettencourt	Visalia, US	2019-06-27	"Quin bettencourt"
Chris Baker	San Carlos, CA	2019-06-27	"Because we don't have many places like this and it's a great experience. I personally think there should be more of them in California."
Heather Tashima	Chino Valley, AZ	2019-06-27	"Oceano Dunes OHV area is a place myself and family enjoy and have for a long time. The thought of not being able to share the love for Pismo and safe respectful OHV use with my children is heartbreaking. There has to be a compromise to keep OHV use possible."
John Kirtley	Long Beach, CA	2019-06-27	"My friend rides there"
Vicki Gustine	Escondido, CA	2019-06-27	"Let's keep Oceano Dunes open. But we can all be better care-takers of that area!"
Carolina Calderon	Fontana, CA	2019-06-27	"Carolina Calderon la Tia"
Tracy Bundrant	Hemet, CA	2019-06-27	"I enjoy access to Oceano Dunes with my family"
lisa zepeda	Pasadena, CA	2019-06-27	"Helping out the family"
Johnnie Ellingsen	La Habra, US	2019-06-27	"Keep it open"
Jaimie Esquivel	US	2019-06-27	"It has been a family gathering place for over 30 years. We go every year for two weeks during Christmas vacation."

Name	Location	Date	Comment
Ravinder Riar	Reedley, CA	2019-06-27	"Keep the dunes open"
shelby opperman	Dixon, CA	2019-06-27	"Favorite place to camp in the sand and beach!"
Christopher Ponce jr	Hemet, CA	2019-06-27	"This will keep kid out of trouble. And the family bonds together rather than sitting in front of the TV, iPhone, tablet or computer. Camping is the best experience in the world Teaches you all about mother nature."
Steve Jepsen	Fresno, US	2019-06-27	"There's nowhere else like it on the coast. Great family fun with millions of memories made for millions of people."
Joshua Allen	Modesto, CA	2019-06-27	"Because i grew up in those dunes and always had a blast, the dunes been there so dont fix what aint broke"
Debbie Driggs	Santa Maria, CA	2019-06-27	"Driving on the beach is a lot of fun."
Dian Watkins	Sweet Home, OR	2019-06-27	"this is an inexpensive way to spend time at the beach with family & friends. Not many places or things to do that is affordable these days."
Jake Duvall	Fresno, US	2019-06-27	"I have been coming out to the dunes since I was 9 years old! I am 36 now!! t's the best place on Earth! Don't take it away from my 3 kids!!"
Peggy Byler	US	2019-06-27	"Peggy Byler"
Marc Armstrong	Grass Valley, CA	2019-06-27	"I believe that it should not be closed down"
Michelle Locke	Carmichael, CA	2019-06-27	"Michelle Locke"
patricia gomes	Chiloquin, OR	2019-06-27	"Keep the DUNES open."
nathaniel alvarez	ramona, CA	2019-06-27	"I"
Nathaniel Clemons	Silt, CO	2019-06-27	"Americans that pay taxes paid for that area! It's OUR land!!"
Kristene Fuentes	Modesto, CA	2019-06-27	"Because I believe the dunes should stay open !"
Mariah Rodriguez	Stockton, CA	2019-06-27	"They should stay open for families"
Al Reagan	Visalia, CA	2019-06-27	"Pismo one of the last places you can camp, ride atvs,bikes,and be with family and friends."
Josephine Teresi	Santa Cruz, CA	2019-06-27	"It's great fun when all get together. And I know this group cleans up well after each stay."
Teresa Rogers	Fresno, CA	2019-06-27	"Four generations of my family have enjoyed oceano dunes ,keep oceano dunes open for the new generations to come."
Ginny Dulay	Santa Maria, CA	2019-06-27	"It's great place to enjoy riding and camping on the beach"
Eduardo Valadez	Watsonville, US	2019-06-27	"Every year we get ready for our family vacation to pismo Families need it open A lot a family memories"

Name	Location	Date	Comment
Karin Gould	Chowchilla, CA	2019-06-27	"This is one of my favorite places."
Laura Nimmo	Reedley, CA	2019-06-27	"I love the Dunes! Started going when I was 8 years old"
Derrick Hanaway	Nevada City, CA	2019-06-27	"I have enjoyed these dunes with my family for the last 20 years. A closure would be a huge loss to me and our community"
Matt Brock	San Andreas, CA	2019-06-27	"My family recreates at that facility. This is where we are able to afford vacations."
Tim Hinkley	US	2019-06-27	"It a good place to take the family."
Andrea Harviston	Huntington Beach, US	2019-06-27	"Great place that makes great memories."
Jo Prutsman	Littlerock, US	2019-06-27	"Do not close this area!"
Jason Frink	San Francisco, CA	2019-06-27	"Kids in the future should be able to enjoy the things we did while growing up. California is taking away far too many of our rights."
Kevin Richards	Lodi, CA	2019-06-27	"It's a family friendly place that my boys hope to get to enjoy for years to come."
Derek Gilbert	Los Angeles, CA	2019-06-27	"I love camping and riding here and have been doing it for almost 36 years"
Josef Shrodes	Rockingham, NC	2019-06-27	"I grew up on these dunes and I visit them as often as I can I would hate to see them gone from the public"
Rebekah Riley	US	2019-06-27	"I grew up going to the desert with family. Im tired of our sandbox being closed."
Carina Duran	Fresno, CA	2019-06-27	"America!"
Michael Seth-Hunter	Simi Valley, CA	2019-06-27	"All the places we like to have recreation are slowly shutting down in California. So many places are already off limits certain tiiof year, or closed already. These places add huge value to the state and local economies. I see no reason why the local plan can't include leaving the Dunes as they have been for more than 50 years. The area also drives almost \$200m in revenue every year, all while seeing a HUGE increase in wildlife returning to the area from the conservation efforts. The dunes have been available for OHV recreation for over 100 years. The current state of the Dunes is working, and working well. It injects large amounts of money into the local economy, which would otherwise have little source of income, the cleanup and conservation efforts are working, and the counties own air pollution reports say the impact of the OHV use is minimal. It's long time to recognize that the few don't represent the wants of the majority, and the NIMBY attitude of the local Central coast doesn't represent the state"
Michael Rickels	Phoenix, AZ	2019-06-27	"Government slowly taking our freedoms away one piece at a time."
Dennis Bell	tulare, CA	2019-06-27	"Need to leave open. People just need to be more careful and smart"

Name	Location	Date	Comment
Mark Davis	Kingsport, TN	2019-06-27	"Keep it open."
Andrea Bellew	Tracy, CA	2019-06-27	"I love to ride and camp there it is a 1 in a million place to go with wonderful memories with my family."
Zane Callahan	Ventura, CA	2019-06-27	"This is a way of life that us out right to have in peace, this isn't hurting anything and anyone. Leave us alone and let us enjoy our way of life, we don't bother you so give us the same respect"
Jon Kauffman	Neotsu, US	2019-06-27	"The land belongs to the people"
Paige Fisk	Turlock, US	2019-06-27	"This place is home to many people and taking it away will change this place in such a bad way. Memories are made there every single day and it will be a shame to lose that for the future."
diana salo	santa maria, CA	2019-06-27	"Diana Salo, This is so wrong. I knwo people complain about the sand in the air but really?? With the winds we have in this valley that is not going to stop with the closure and look how many jobs will be lost and the loss of tourist income. I have family that travel from all over in order to enjoy this beach"
Jackie Ellis	Buckeye, AZ	2019-06-27	"I ride and they are slowly taking our riding areas away"
Cynthia Ochirosi	Santa Paula, CA	2019-06-27	"Healthy recreation for kids and adults."
Thomas Cope	Lake Elsinore, CA	2019-06-27	"I love camping and off-roading and it's important to have these areas legally available."
Rob Davis	Las vegas, US	2019-06-27	"Because this land belongs to us and we should be able to have fun and enjoy it ."
Patricia Lopez	Selma, CA	2019-06-27	"I'm a recreational user I love this beach and the dunes"
Bill Quilty	Kingsburg, US	2019-06-27	"Bill Quilty"
Wayne Sudweeks	BRENTWOOD, US	2019-06-27	"Once 15,000 acres, down to 1500 acres and now off limits for all. It's called incrementalism. They keep taking a little at a time until you have nothing. Way to stick it to us Liberal California. Our guns are next. Wake up America!!!!!"
Doris Rose	Las Vegas, US	2019-06-27	"I have five generations of are familys that enjoyed and rode the dunes without any deaths!! We Respect what God has given us to enjoy and definitely cleaned up are messes!!! For more Generation to enjoy the beautiful ocean.
Dave Rennie	Reno, NV	2019-06-27	"I would like to keep current ohv areas open for future generations to enjoy"
Stephanie Eastman	US	2019-06-27	"Family time camping and riding. Even my 65 yr old Mom was excited about riding. We bought her a 4 wheeler just for Pismo. Was looking forward to sharing with my grandchildren when they come to California to visit."
janet montedinos	San Jose, CA	2019-06-27	"Janet Montesinos"

Name	Location	Date	Comment
Currie Bailey	Templeton, CA	2019-06-27	"Even though I don't go there many families do and have for years! And the science behind why they want to shut it down is shady at best!"
Lucy Nunes	Gustine, CA	2019-06-27	"Camped their before our kids and our oldest is 27 nowwe still all go there on vacation and my kids and grandkids go. It's our tradition of great family get together"
Ashlyn Renteria	Hollister, CA	2019-06-27	"My family and I go to Pismo about once a year to ride quads and spend the weekend camping there. We love going there and it would be so sad to not have that anymore!"
Joanne Fernandez	Ventura, CA	2019-06-27	"Joanne fernandez I feel this is great for family fun to keep it open"
Ryan Mainka	Midland, US	2019-06-27	"Im signing this because I want my kids and future generations to have a chance to enjoy the love and passion I have for the Offroad world"
Nick Milkovski	San Leandro, CA	2019-06-27	"Next they will come for Carnegie and Hollister SVRA. This is how our rights get taken away. Need to shut down these DemocRATS and vote them out ASAP!!"
Christopher Figiel	Hopewell, VA	2019-06-27	"I have a trip planned."
Erick Hart	Santa Rosa, US	2019-06-27	"It has been our right to enjoy this OHV park and that right should remain."
Brandon Wilcox	Citrus Heights, CA	2019-06-27	"Brandon Wilcox"
jeffrey mann	Alamo, US	2019-06-27	"Keep California a fun place to be."
Meghan Middleton	Salinas, CA	2019-06-27	"We need to have recreational areas!!"
Sandra Shaver	Riverbank, CA	2019-06-27	"My family vacations there every year. It is a wonderful, fun family and friends trip."
Goran Knezevic	US	2019-06-27	"Dunes rule"
Corina Lozano-Owens	US	2019-06-27	"I'm signing because my family loves to visit the dunes & make memories with their children and family!! And we have been doing it for years. We want to have more memories being on the Dunes with our family"
Steven Fouts	Phoenix, US	2019-06-27	"Steven Fouts"
Wayne Foster	San Luis Obispo, US	2019-06-27	"Sad part is these people are deciding our fate, when they don't even live here in the area."
Jay Huck	Bellflower, CA	2019-06-27	"I ride dirt bikes and pay taxes"
Derik Wooddell	Lake Havasu City, US	2019-06-27	"Because the California coast line was once a giant crude oil production operation that caused more coastal damage than any amount of ohv traffic on those beaches ever will. It's a bunch of liberal democratic BS, and California has enough of poor

Name	Location	Date	Comment
			government decision making already. They work for us, not the other way around."
Christopher Sherman	Maricopa, CA	2019-06-27	"One open dune is needed. It is the last of its kind and needs to stay open for public use."
Abraham Ramos	Westmorland, US	2019-06-27	"Not from that area but I know a lot of people that are and they go out there and ride."
maria larranaga	Rio Rancho, NM	2019-06-27	"We have enough hotels and not enough land that allows families to gather and enjoy outdoor recreation."
Ryan Bucknum	Ogden, UT	2019-06-27	"I like dirt bikes and camping"
kevin stearns	Hollister, US	2019-06-27	"These people work for us! We hold the power."
sue reynolds	laverkin, UT	2019-06-27	"We need this for future generations to enjoy too."
stephanie Brady	Sunland-Tujunga, CA	2019-06-27	"Pismo dunes need to stay open!"
Mykal Solis	Tulare, CA	2019-06-27	"Its a great family destination and camping area for low cost."
Zachary Fulgenzi	Ft Richardson, AK	2019-06-27	"I love riding in that area"
Miguel Cortez	Las Vegas, NV	2019-06-27	"Stop with the restrictions!!!!"
Ashley Giggy	Van Nuys, US	2019-06-27	"Lots of memories with family that's not around and would live to share it with my kids ."
Bree Bills	Avondale, AZ	2019-06-27	"My family and I have been going for years! Please please don't take this amazing place away from us!!!"
Ashley Berry	Santa Maria, CA	2019-06-27	"This is our home town and they can't keep taking everything from us !!!"
Kevin McCafferty	San Carlos, US	2019-06-27	"I like pismo"
Linda Overbey	Thousand Oaks, CA	2019-06-27	"I love the dunes"
Todd Klein	Sanborn, US	2019-06-27	"I ride dirt bikes and raptors"
William Reiter	Tustin, CA	2019-06-27	"We need to keep this area open for those that enjoy the area"
Bryce Walker	Truckee, CA	2019-06-27	"Tired of people shutting places down that they have absolutely nothing to do with stop with the BS we are here to fight for our land"
Robert Delgado	Oceano, CA	2019-06-27	"I'm from oceano."
Christopher Ortega	Valley Springs, CA	2019-06-27	"Chris Ortega"
Darick Apodaca	Los Angeles, CA	2019-06-27	"I believe"
Ralph Martinez	Hesperia, CA	2019-06-27	"Need them open family fun."

Name	Location	Date	Comment
Dolores Contreras	Hanford, CA	2019-06-27	"I love this spot so don't close it"
Toreia Miller	Mentone, CA	2019-06-27	"This should be left open. It's just another thing you're taken away from us. Keep the dunes open, keep the dunes open, keep the dunes open!!!!! Stop Closing our areas to ride and enjoy with our family."
Gerald Marlin	Carrollton, GA	2019-06-27	"carol marlin"
Shirley Adelhelm	Santa Maria, CA	2019-06-27	"Keep the Oceano Dunes open"
Katie Tunquist	Stockton, CA	2019-06-27	"This is a beautiful beach and this is our family tradition going and enjoying the beautiful dunes and the ocean and being able to camp on the beach and ride"
Cheri Van Bronkhorst	Antioch, CA	2019-06-27	"I support the cause"
Elisha Mckeown	Watsonville, CA	2019-06-27	"Elisha Mckeown"
James Black	Bothell, WA	2019-06-27	"We have to keep public riding areas open!"
Blair Hake	Stockton, US	2019-06-27	"I enjoy the open space of the dunes and feel future generations should be able to enjoy them as I have"
matthew buzas	Anchorage, AK	2019-06-27	"We need more recreational activity areas"
Robert Timmons	San Ramon, CA	2019-06-27	"Without pismo Cali sucks."
Rita Spence	Orcutt, CA	2019-06-27	"We've all enjoyed the dunes for generations. For those of us from the central coast we know the laws and rules and are brought up on the safety our parents, grandparents, aunts and uncles have taught us. It's normally the people from out of the area who go beyond those realms who are injured and even killed.Please, please, leave the dunes open so that we msy pass on to our children."
Roland Schwartz	San Francisco, CA	2019-06-27	"Roland Schwartz"
Tiffini Durham	Wheatland, CA	2019-06-27	"Because they should keep them open to the riders."
James Orcutt	Fresno, CA	2019-06-27	"Too much overreach into our public land."
Robert Michael	Ontario, CA	2019-06-27	"Because i cant tear up the white house lawn with my 2-smoker"
Richard Ewers	San Jose, CA	2019-06-27	"My family enjoys camping and riding in the dunes."
Brian lehne	Hanford, CA	2019-06-27	"Although I do not, many of my friends vacation there."
Aaron Smith	US	2019-06-27	"I want to quit hearing you all bitch so much"
Adrian Alaniz	Midland, TX	2019-06-27	"It's the right thing to do"
mark peters	Oakdale, CA	2019-06-27	"I have enjoyed the beach since 1979. I would like to show my granddaughter how beautiful this place is. T.y."

Name	Location	Date	Comment
Veronica Rea	Goleta, CA	2019-06-27	"Veronica Rea"
Whisper Gray	Manteca, CA	2019-06-27	"This is an important tourist and family destination."
Shirley Gasper	Hanford, CA	2019-06-27	"Shirley Gasper"
Elizabeth Guerriero	San Luis Obispo, CA	2019-06-27	"Elizabeth signed!"
John Vera	Riverside, US	2019-06-27	"This is where I grew up!"
Lisa Perrin	Lodi, CA	2019-06-27	"I don't think it is right to close this place up. My son, daughter in law and grandchildren love to go camping here and so do there friends. Alot of people enjoy it and like to ride around it is such a wonderful place to be. There are alot of people that will be put out of business if this happens too I don't think that is right or fair to them either. Please we need to keep this open for everyone involved the campers and the people who are in business."
Erin Lafayette	Sonora, US	2019-06-27	"It's the one place we vacation"
Alyssa Estevam	Rye, NY	2019-06-27	"I've been coming since I was a kid and I want to take my kids one day. A beautiful beach and amazing place to ride."
fred king	Beaumont, CA	2019-06-27	"Our beaches are regularly being government controlled into 'humans aren't welcome' yet we pay taxes and fees for the luxury of their existence. It's public land. It's our right."
Drew Marr	Bakersfield, US	2019-06-27	"Our land, not the governments. If you close it, will take back more than we have now! This state sucks asshole!"
Fermin Rios	Baldwin Park, CA	2019-06-27	"Fermin rios"
Jennifer Saunders	Grover Beach, CA	2019-06-27	"Because it's the last of its kind and it's important to our towns."
Liz Rico	Fairfield, CA	2019-06-27	"We love going there every year! It's our family tradition. My kids favorite place in the world."
Nicholas Costamagna	Citrus Heights, US	2019-06-27	"Goooood"
Mikey Majors	Westwood, CA	2019-06-27	"The ocean riding is badass."
Tanya Moyle	US	2019-06-27	"I am sick and tired of all of the closures on our public lands that we the tax payers pay for. Everything in our beloved country is going to hell in a hand cart and it is time that we the people stand up for our rights! And say go to hell to all of the environmentalists and our government. This is our land and we pay for it!!!"
Robert Jewell	Indio, CA	2019-06-27	"Because to much recreation land gets taken away from us . They say we're tearing it up . Then they build house's etc. On it ."
jerry clark	Salinas, CA	2019-06-27	"i grew up having fun at the dunes.its a shame that libtards have to ruin everything."

Name	Location	Date	Comment
GREG SWANSON	ATWATER, CA	2019-06-27	"Greg Swanson agrees"
Clyde Roberts	Pismo beach, CA	2019-06-27	"Clyde Roberts"
Brigitta Hopkins	Reno, NV	2019-06-27	"I've been using the SVRA since 1969. This is public land for public use. If home owners choose to live next to the dunes, they will get blowing dust whether people are using the dunes for recreation or not. Closing down the dunes has been an on going problem. A small council of people have chosen to make the recreation area smaller and smaller then complain it's causing problems. Spread those people out over the full length of the dunes and you won't even notice them out there. If you don't like blueing dust, move. The beach is for everyone, not a select few."
James Patterson	St. Louis, US	2019-06-27	"Let's hope it stays open loved riding and camping there when I lived in CA."
Christina Lagrimas	US	2019-06-27	"Save the Dunes, don't let's those idiots shut it down."
Savina Morales	Los Angeles, CA	2019-06-27	"Savina Morales"
Stephen Skjod	Thermal, CA	2019-06-27	"I have spent my whole life off-roading and I hope future generations will be able to do the same."
Matt Renick	Phoenix, US	2019-06-27	"You are ruining CA just stop with the nonsense laws"
pete rios jr	orange co., CA	2019-06-27	"This is family stuff has us together all the time. My kids love it"
Brian Kitchen	Lancaster, CA	2019-06-27	"I camped there many times with family and friends. This will be a great loss of a beautiful recreation area"
Hannah Marroquin	Bakersfield, US	2019-06-27	"I'm signing because I love pismo beach and the atmosphere out there !"
Patricia Svedin	Oregon	2019-06-27	"My family have been camping here for my whole life. This is insane."
Mike Lionudakis	Bellevue, WA	2019-06-27	"Been going since I was a kid, everything is being taken away in California including gun rights. please don't take away and close the only recreation park left! just make it a business in charge more like everything else in California"
Angela Winchell	Napa, CA	2019-06-27	"This is a wonderful place to visit. The whole reason is to be able to drive out into the beach and camp. Please don't close it off."
Keith Fought	Grass Valley, CA	2019-06-27	"I've never been to this place before I hope to near the future and I know a lot of people goes here I really hope this place stay open"
Bobbi Gates	Corona, CA	2019-06-27	"I love this place. It's the best of off roading camping an family beach time"
scott mcintosh	santa rosa, CA	2019-06-27	"I'm tired of them taking our freedoms away"

Name	Location	Date	Comment
Yvette Salcedo	San Bernardino, US	2019-06-27	"Shouldn't be closed for no real reason. It's anamazing place to enjoy with family, friends and new ones at that! �"
David Gardner	Livermore, CA	2019-06-27	"We need it"
Drew Felker	US	2019-06-27	"I like going to the dunes"
Charles White	San Carlos, CA	2019-06-27	"I support my friends who enjoy the dunes"
Travis Sherman	San Jose, CA	2019-06-27	"I have risen there and it would be a cool place to keep open they keep making it smaller now they are trying to take it. There's not a lot of places u can ride like pismo"
Alyssa Bonham	Turlock, CA	2019-06-27	"I'm signing because pismo beach is a beach that me and my family go to every single year sometimes multiple times a year. I'm 20 years old now and I want to be able to show my children pismo and experience all the great memories that me and my family have. You can close this beach down. I bet y'all make so much money off of it plus all the other business around the beach. It's just plain silly if your going to close it."
sean malloy	Hesperia, CA	2019-06-27	"Camping and riding is all good for us!"
Frank Shalabi	Chicago, IL	2019-06-27	"There are so few places open to motorized vehicles. This is a final haven for people in an amazing place. Please keep it open."
Alyssa Bonham	Turlock, CA	2019-06-27	"Can't*"
Dustin Johnson	Sonora, CA	2019-06-27	"I want to see our ohv parks stay open for everyone to enjoy"
Chris Breeden	Scotts Valley, CA	2019-06-27	"My kids and I love coming to Pismo to ride the quads. It's a fun family trip for us."
Jodi van Loben Sels	Courtland, CA	2019-06-27	"I want the Dunes open for public use!"
Austin Hawks	US	2019-06-27	"This is where I spent my childhood and I would want my future kids to get to experience it as I did."
Blake Joslin	Newport Beach, US	2019-06-27	"Motorcycles and off-roading is not a crime. #TillTheWheelsFallOff"
Jacob Scott	Auburn, CA	2019-06-27	"I want to make sure any and all OHV access remains! No more taking our OHV AREAS"
Cody Armstrong	Alpine, CA	2019-06-27	"Such a beautiful place to go and relax."
matthew Larrabee	Lake Elsinore, CA	2019-06-27	"Fuck the government"
Mike Addy	Oceano, CA	2019-06-27	"Want to Support Local Businesses here on the Central Coast."
Ryan Crain	US	2019-06-27	"We love the dunes"
Angela Porte	Atascadero, CA	2019-06-27	"Riders need a place to go camp with their families and ride, safely . Please keep this place open!!"

Name	Location	Date	Comment
Sean Boss	Huntington Beach, CA	2019-06-27	"This is the last beach in CA that we can still enjoy UTV's on!"
Lillian Barrera	Santa Maria, CA	2019-06-27	"The Oceano Dunes belong to the public!"
Shauna Wright	Fresno, CA	2019-06-27	"My friend Michael E and his family just love this place!"
Grace Buschhueter	Mariposa, CA	2019-06-27	"This is my favorite place to ride"
Francesca Clavier Smith	Vista, CA	2019-06-27	"I want the State Parks to keep the OHV parks open."
Jason Dupuis	Arroyo Grande, CA	2019-06-27	"I live on the Mesa above the dunes and my family frequent the dunes. It was a large draw for moving here. It is an iconic destination and large source of tourism for our local economy."
Sheri Castanien	Springville, CA	2019-06-27	"This is how I grew up. My favorite memories of camping and being responsible and respectful are the lessons I want to teach my children. Please don't take that away."
Ronald Olesh	Riverside, CA	2019-06-27	"Keep your regulations out of my desert. Free the desert!!!"
Terre Rothweiler	Santa Cruz, CA	2019-06-27	"Because I think it's wrong to shut it down. It's a family environment. I grew up going to that facility and have some of the best memoirs growing up there."
Eric Newman	Riverside, CA	2019-06-27	"Having grown up going to Pismo with my family I have lots of great memory's that I am trying to pass on the my family now by going and camping there."
John Jennings	Redondo Beach, CA	2019-06-27	"Pismo belongs to the people!"
Jacob Owens	Merced, CA	2019-06-27	"I like going there to have fun"
Monica Romero	Citrus Heights, US	2019-06-27	"Monica Romero Tulare,Ca"
Anthony Mascaro	Riverside, CA	2019-06-27	"I like to ride and camp"
Derik Balangue	Concord, CA	2019-06-27	"Because I grew up out there. That's majority of tourist money in pismo and it would be a devastating loss."
James Campbell	Los Angeles, CA	2019-06-27	"This is a place where people can legally enjoy them selves camping and riding in the dunes it is ridiculous to close it you will destroy the economy of Pizmo beach"
Redenna Baker	Orcutt, CA	2019-06-27	"This is a staple in the community. The economic ramifications of shutting this down will be far reaching. Instead of closing something down- figure out a way to make it safer. What will happen to local businesses when the tourist industry slows?"
Francisco Velasquez	Hanford, CA	2019-06-27	"Keep America Free!! �酪"
Keaton Hamett	Twin Falls, ID	2019-06-27	"It's a great place to ride"

Name	Location	Date	Comment
Michael Mcmurtrey	Lower Lake, CA	2019-06-27	"As a responsible rider and environmental activist, I strongly support keeping the oceano off-road area accessible. I grew up in Nipomo and spent my childhood and young adulthood riding, surfing, fishing and advocating for responsibility to protect vegetation, bird life, and the unique fish and mammal species. Compromise is the key. Off readers are losing access to many acres and miles of recreation areas throughout California. Please keep Oceano OHV area open."
Nick Burnett	Oakland, CA	2019-06-27	"You guys are forcing us to stay inside and be brain washed by tv"
Natalie Heer	Mission Viejo, CA	2019-06-27	"We have yet to go play here and would still love too!"
Yvonne Wilke	Modesto, CA	2019-06-27	"Yvonne Wilke"
Stephanie Lewis	Chico, CA	2019-06-27	"This is a great family vacation spot. It brings lots of money to the area also"
Imelda Sanchez	Gonzales, CA	2019-06-27	"I don't want it to close down.my kids love riding their quads there"
Annette Sunda	Flagstaff, AZ	2019-06-27	"I'm signing because healthy outdoor recreation is a part of what makes this country GREAT. The area reserved for sporting activity would take years to "recover to a natural state", by allowing people to continue their recreation in this location you can prevent new damage to other area. Please keep this site open to recreation."
Mikey Tierney	US	2019-06-27	"We need to keep the beach ohv culture alive. Not to mention that whole town"
Dan Ngui	US	2019-06-27	"Make America great. Go brapp every day"
Amanda Lang	Visalia, CA	2019-06-27	"The dunes are an amazing place for family fun. Please don't let a few fools ruin it for the rest of us!"
ANNETTE EKELIN-GARCIA	COARSEGOLD, CA	2019-06-27	"State Parks are a place where people can go to enjoy our beautiful nations God given expanses of diverse majestic enormous unique attributes."
Cynthia Vargas	Modesto, CA	2019-06-27	"It's an important part of my friends children's lives. They love vcd to ride!"
Robert Owens	Frienswood, TX	2019-06-27	"We need to keep these areas open"
Nancy Mojica	Hayward, CA	2019-06-27	"My family goes 3 to 4 times a year family reunion."
Tony De Soto	La Crescenta, CA	2019-06-27	"The Oceano dunes hold near and dear memories to me, and to close the area would be a great tragedy for all of us who enjoy our park as well as future generations. I would be saddened to think I'll never be able to take my daughters to the dunes to experience what I did as a child."
Cory Sanfilippo	Queen Creek, US	2019-06-27	"It's the people that just go out there to get drunk and party that wreck are forest and riding areas, not the ones the use it for the good it was put there for."

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Gina Inman	San Jose, CA	2019-06-27	"This place is magical!!!"
Cory Wing	Livermore, CA	2019-06-27	"Great place to ride!!"
Daniel Paul	US	2019-06-27	"Send it is life"
Mary Parra	US	2019-06-27	"Mary Ellen parra"
Amy Gallagher	Arroyo Grande, CA	2019-06-27	"I live on the Central Coast and I KNOW the VALUE and TOURISM this brings to our area. Please don't let the Coastal Commission take more away from our Communities."
Chance Stirling	Van Nuys, CA	2019-06-27	"Pismo is a childhood memory and a family fun riding spot"
Kirk Slagle	Phenix City, AL	2019-06-27	"Why not"
Ashliegh Brokken	Ventura, CA	2019-06-27	"Because it's meant to be a playground for adults and kids."
Vickey Ford	Modesto, CA	2019-06-27	"Vickey Ford"
Roger Farrell	Santa Rosa, U.S. Outlying Islands	2019-06-27	"The benefits of this seem to outweigh the cons."
Marsha Early	Lemoore, CA	2019-06-27	"There is plenty of walking areas. Stop taking away places for people to enjoy their off roading."
Richie Fortado	San Diego, CA	2019-06-27	"Stop taking away our recreation! We're not trying to take away your badminton courts so we can build butterfly sanctuaries!"
Stephen Bry	Brentwood, TN	2019-06-27	"Let people have their fun in a safe environment."
Ben Genco	Fresno, CA	2019-06-27	"These dunes are a century old camping tradition."
Daytona Hernandez	Fresno, CA	2019-06-27	"Keeping my childhood memories alive"
steve white	midlothian, TX	2019-06-27	"Atv and Mx are cool and need places to ride. Promotes family time"
Kendra Hunt	Chandler, AZ	2019-06-27	"I'm a dune addict and this is part of our freedom! �� Keep the fun open"
Edward Alvarado	Fresno, CA	2019-06-27	"Because I take my family on trips to the dunes camping"
Denise Hamilton	Waterford, CA	2019-06-27	"Denise Hamilton"
Caitlin Duncan	Simi Valley, CA	2019-06-27	"I'm signing and sharing this petition because this has been an amazing family camping spot for generations!"
Nikki Wilkey	Yuma, AZ	2019-06-27	"It's our rights and we have the right to have fun."
Julian Almance	Odessa, TX	2019-06-27	"Hell yea."
Monica Esparza	Gilbert, AZ	2019-06-27	"My family and i are avid riders. Ig pekole were to just follow the rules and habe common courtesy the oarks are safe."

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Lenore Bishop	Moss Landing, CA	2019-06-27	"Lenore Griffith Bishop"
Michele De Marco	Mountain View, CA	2019-06-27	"This is going to kill the tourism in the area. Off raiders are spending good money in the town and in restaurants."
CRYSTYL HOPKINS	el dorado, KS	2019-06-27	"I love to visit and spend time with my kids when we are out in cali. It's nice to be able to show and do things I did as a kid with them."
Ellyanna Russell	San Bernardino, US	2019-06-27	"Oceano dunes is great!:)"
Nancy Culbertson	Fremont, CA	2019-06-27	"Nancy Culbertson"
Lance Rhoades	Redding, CA	2019-06-27	"We need recreational areas"
Cecilia Pena	Gonzales, CA	2019-06-27	"Me and my Family have enjoyed camping and riding out at the Océano Dunes for many years, and we would hate to see it go! We have so many memories there!"
Matt Spencer	Oakland, CA	2019-06-27	"Becuase its rediculous they want to close the beach."
Aaron Moran	Clovis, CA	2019-06-27	"pismo for life!"
Tim Duncan	Simi Valley, CA	2019-06-27	"I'm signing because I grew up going here with my dad, and I'll be damned if i'm unable to take my kids because of the government."
Linda Hauptman	Corona, US	2019-06-27	"Families need camping places."
Diana Roza	San Antonio, TX	2019-06-27	"This important to many of my family members and community"
Daniel Johnson	Visalia, CA	2019-06-27	"We enjoy the beach and our using the beach and dunes to camp and ride doesn't harm the environment. This whole thing is caused by a bunch of rich kids throwing a tantrum"
Bethany Klein	Las Vegas, NV	2019-06-27	"For my nephew Josh"
Debbie Norling	San Pablo, CA	2019-06-27	"I live in Lompoc and love going to the dunes"
Gilbert Orozco	Bakersfield, US	2019-06-27	"It's a good place to go camping and hangout with the family"
Chad Walker	Joshua Tree, CA	2019-06-27	"It's not fair we grew up at these riding spots it's the little bit of last freedom in California and there even trying to fuck that up for us too"
Shelley Ortez	Fremont, CA	2019-06-27	"I grew up enjoying pismo. Our same group of friends have been going for 30+ years together and have made so many great memories."
Maria Tapia	Santa Maria, CA	2019-06-27	"Me and my family love to go out to the dunes and have a good time. We live in the beautiful Central Coast, this is all we have to enjoy ourselves!"
Robert Nichols	Bakersfield, CA	2019-06-27	"I go camping there several times a year and enjoy the family time"

Name	Location	Date	Comment
Matthew Sprague	Berthoud, CO	2019-06-27	"We lo ok e going to these dunes great place for our family vacation"
John Styers	Plains, MT	2019-06-27	"John Styers"
Jie Chavez	Moreno Valley, CA	2019-06-27	"Were losing our riding areas.As a taxpayer, I think it is wrong to close any more of this area down."
Lynn Santos	Oakley, CA	2019-06-27	"I love riding at the Dunes"
Dillon Pettegrew	Las Vegas, NV	2019-06-27	"There aren't many places we can ride legally anymore and without pismo more and more people will get in trouble for riding in places they aren't supposed to."
Glen Krieger	Sherwood, OR	2019-06-27	"We need this in our lifes"
Matt Wilson	Ventura, CA	2019-06-27	"We need the dunes"
Julie Skillman	Dana Point, CA	2019-06-27	"Because I am sick our our open space for us Californians being taken away for greed! NO MORE BUILDING!!"
Cynergy Shaw	US	2019-06-27	"I love to ride my dirt bike on OHV trails."
Antoinette Machado	Stevinson, CA	2019-06-27	"To please not shut it down there's always knot heads that ruin these places and the abiding people lose out there is many good memories from Pismo dunes start sitting trouble maker's and band the worst I pray it stays open"
Travis Liston	Clearfield, UT	2019-06-27	"Save our rights"
Shannon Clea	Whittier, CA	2019-06-27	"Refuse to let others reunion the fun for everyone."
Daryl Mirabueno	San Jose, US	2019-06-27	"Do not take away the rare get away the oceano dunes provides!"
Amador L. Martinez	Fresno, US	2019-06-27	"The best camping an riding experience ever is there. A great place for family and friends !"
Stacey Jacobs	Clovis, US	2019-06-27	"I'm signing this because they should not be closed."
Carl Welliver	Stoney Creek, US	2019-06-27	"We need to keep this available for everyone!"
Ashley Frazier	Newman, CA	2019-06-27	"We love the dunes!"
Anthony Myers	Escondido, CA	2019-06-27	"Because there is no reason to close the dunes and every reason to keep them open."
Kaylin Patterson	US	2019-06-27	"This place is so close to my heart. So many thanksgivings spent here camping on the beach, thanksgiving wouldn't be the same without the dunes."
Nick Bays	Clovis, CA	2019-06-27	"I'm signing because, why stop people from having fun that isn't illegal?¿"
Megan McManus	Bakersfield, CA	2019-06-27	"Megan McManus"

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Austin Coulson	US	2019-06-27	"Love camping there with family!"
Tammy Pigao	Aromas, CA	2019-06-27	"Want to keep this site open for families to enjoy, isn't there some way to cable off the dunes to protect them?"
Chris bloch	Indio, CA	2019-06-27	"We need to preserve the only beach riding and camping area in the state of California"
Deborah Moore	Sheep Ranch, US	2019-06-27	"Watching our family spending time together outside. Respecting our Dunes and just having good fun. Meeting new friends."
Sarah Ballard	Kingsburg, US	2019-06-27	"I spent many years of my childhood at the Dunes with family and friends I call family. Life lessons and memories that are priceless. I want the same for my children and generations to come. Sign the petition!"
Cheryl D. Fisher	Lindsay, CA	2019-06-27	"I love the Dunes and they have been tradition for a very long time. Fun fun fun"
Kristen Graham	Moss Landing, CA	2019-06-27	"We love to visit the dunes!"
Garrett Hunt	Salina, UT	2019-06-27	"We need our ohv lands."
Emily Anderson	Big Creek, CA	2019-06-27	"I have enjoyed visiting the Oceano Dunes with my family as a child and now wish to share this experience with my children. I truly believe people care to preserve only that in which they have experienced. Hopefully, my children will love this place as I have through the joy of family experiences like this. Please do not chip away at what makes California awesome!"
Ernesto Fernandez	Santa Maria, US	2019-06-27	"It's part of home. It's my childhood and should be part of my unborn grandchildren's childhood as well."
Colleen Duerksen	Visalia, CA	2019-06-27	"Oceans dunes is a rare place and should be kept open for OHV use with no further restrictions."
Cynthia Lee	Visalia, CA	2019-06-27	"Childhood memories of "the dunes" will forever remain in my heart and I am now 68 years old. I still enjoy them. Closing them is not the answer!!!"
Anne Burek	Pleasanton, CA	2019-06-27	"Anne Carol Burek"
Walter Klauer	Grass Valley, CA	2019-06-27	"I think it will have a negative impact on the local economy. My parents went there in the 60s. I want keep taking my kids there. There is no other place like that on the California coast. That makes the location a very special one. If the dunes are closed many people would not visit the area anymore. I can walk on a beach much closer to home."
Rachelle Newton	Fremont, CA	2019-06-27	"I love Grover beach please keep it open"
Daniel Plunk	Modesto, CA	2019-06-27	"I'm signing because the dunes are a yearly family vacation spot we go to. We have an amazing time and so do many other families that go. Not only that, but the city and state would be losing TONS of

Name	Location	Date	Comment
			income from all the people coming in not just from our state, but all across the country."
Nathan Lewis	Redding, CA	2019-06-27	"Because my friends and family love the ocean and sand we go ones a year"
Joshua Grell	Los Angeles, CA	2019-06-27	"I love that place and it would be a shame if it was to go away!!"
Christina Burke	Fresno, CA	2019-06-27	"California beaches are for the public period!"
Amber Lu	Stella, MO	2019-06-27	"Husband's friend rides there"
JUAN GAMEZ	Norwalk, US	2019-06-27	"Oceano dunes have become part of our family tradition"
Genesis Silva	Modesto, CA	2019-06-27	"I'm signing because it's a beautiful location to experience. It would be such a shame to lose access to this California State Park."
Adam Ayala	Elk Grove, CA	2019-06-27	"Me and my family love going here"
Debra Ramirez	Palmdale, CA	2019-06-27	"Please keep open"
Ian Yarnell	Visalia, CA	2019-06-27	"It's so fun to be at the dumes riding"
Tyler Cull	Shingle Springs, CA	2019-06-27	"i would like to take my kids to oceano dunes. its been a goal for a long time. and weve just got everything ready to be able to do so. please dont shut this place down."
Rayneen Ramirez	Amarillo, US	2019-06-27	"I believe my family should have a pletce o go and have some fun and they been going for along time save this for them"
karen Johnson	Great Falls, MT	2019-06-27	"Need to have fun alternatives!"
Michael Arredondo	Paramount, CA	2019-06-27	"I want the Dunes to stay open. The issues that are being brought up like the dust is just ridiculous. It started from that issue to now closing and OHV park thats been open for a long time. I only travel to this area for the OHV areas and camping at the dunes"
Alexis Martinez	Santa Ana, CA	2019-06-27	"This is an annual trip for my family and I. We always plan this trip to enjoy off-road and being together as a family. There is no other place to off-road near the beach. This is the go to spot and it would be a shame for it to be taken away."
olivia amaya	san jose, CA	2019-06-27	"Supporting my friends"
George Starr	Santa Clarita, CA	2019-06-27	"I think OHV recreation is a good family sport."
Shelbi Enos	Hanford, CA	2019-06-27	"The dunes are an incredible place for friends and family to come together from all over California most of my childhood get always are memories at this amazing place!"
Nate Wingert	Visalia, CA	2019-06-27	"This area is an important recreation area for our area and should remain available for families."
Andre Bueno	Salinas, CA	2019-06-27	"Been camping there since I was 3 years old at least 3 times a year minimum. Keep our off road areas open!!!!"

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Linda Hiniker	Tehachapi, CA	2019-06-27	"One less rec. area means many more people with less to do."
Luke howard	La Jolla, CA	2019-06-27	"My family and I have been riding the Pismo dunes responsibly for over 40 years. There should be no new agenda for this area. The town thrives on the Offroad community and much of the local community enjoys this including my family that lives there. This is also a slippery slope, what's next? Ban off-roading in Ocotillo and Glamis?"
Jennifer Marlow	Ventura, CA	2019-06-27	"Because we need to preserve our beaches and keep more future family memories and nostalgia alive for our friends and fam <3"
Kathy Fuller	Lakeside, CA	2019-06-27	"I drive a JeepI like to drive off-road. What else is there to say really"
Ali Bumpus	Bakersfield, CA	2019-06-27	"Allison bumpus"
Sila Khoun	Fresno, CA	2019-06-27	"Sila"
Joselyn Macias	Orange County, CA	2019-06-27	"Helping others"
Stephanie Oberg	Soddy Daisy, TN	2019-06-27	"My Dad grew up riding on these dunes and my husband brought my son out here to ride their dirtbikes. Such a great place for family time."
John Linbarger	Eugene, OR	2019-06-27	"To allow more generations to enjoy the outdoors riding motorcycles enjoying family time and teaching kids respect or the areas we use"
Patty Bixler	Fresno, US	2019-06-27	"We are members of a buggy club. Have been for over 50 years. Why would you want to be so selfish as to take this away?"
Thomas Catanese	Thousand Oaks, CA	2019-06-27	"Of the entire coast of California, this is the only 1.5 miles of beach you can off road. Protect the local businesses that rely on this OHV area."
Alicia Mack	Rosamond, CA	2019-06-27	"Want to keep them open and going. So my daughte may go some time with he buggie."
Ashley Yanez	Santa Maria, US	2019-06-27	"i love the dunes and i want my boys to be able to have as much fun as i have had growing up."
Alicia Coon	Spencer, WV	2019-06-27	"Alicia Coon"
Sierra Surabian	Santa Cruz, CA	2019-06-27	"It is our right to enjoy our land."
Michaele Dempsey	San Francisco, US	2019-06-27	"Keep it open it's a tradition in our family for 40 years I want my grand kids to go and play in the sand"
Elizabeth Tidwell	Alabama	2019-06-27	"Keep our lands open!"
Brock Greer	La Quinta, CA	2019-06-27	"This is the only waterfront riding in California left"
Kolin Orr	Ventura, CA	2019-06-27	"It's only right"

Name	Location	Date	Comment
Julie Friel	Oxnard, CA	2019-06-27	"Julie Friel"
Vanessa Dellamalva	Simi Valley, CA	2019-06-27	"I have always wanted to go and I want my children to have the chance to experience it"
KChief Armstrong	US	2019-06-27	"Trent"
James Bellamy	La Mesa, CA	2019-06-27	"There is no reason to shut down this great recreational place we all enjoy just leave it the way it is thanks you"
Dakota Chillinsky	Temecula, US	2019-06-27	"Familiies an Kids need places to take out there camping equipment and motorhomes an bring out there dirtbikes, quads, handrails to have fun cause its obviously illegal to ride/do those things in the city. Some people see it as nothing because there not into camping/motorhomes/ride dirtbikes ect. But to others it's a place for family gatherings, camping, and getting away for the weekend after a long week of hard work and these people look forward on a Monday morning at work thinking/planning there weekend getaways so just because certain people dont like/or do those types or things dont ruin it for the people who love using those grounds to bring people together(friends,family) and it's a great time/place to make new friends to share the experience an new memories TOGETHER! Key word: TOGETHER"
Amber jones	Bakersfield, CA	2019-06-27	"My family and i have been camping on thos beach since i was 2 weeks old no joke we have made so many memories and have made memories of our own with our children this would be a shame if it gets closed down"
Jose Espinoza	Lindsay, CA	2019-06-27	"I want to"
Santos Apodaca	Porterville, US	2019-06-27	"Santos Apodaca I go there every year Don't close it my kides �"
Shari Gray	Cypress, CA	2019-06-27	"Because I want to keep our camping and riding areas open"
Megan Duvall	Fresno, CA	2019-06-27	"To be able to share this fun place with our children."
Stephanie Kowatch	Reno, NV	2019-06-27	"My husband loves his dune riding and I love coming to pismo which won't happen without dunes to ride!"
Kellee Dell'Aquila	Turlock, CA	2019-06-27	"This is for our families spending time together."
Azbossup Kennels	Phoenix, AZ	2019-06-27	"josh ponce"
John Thomasson	Apache Junction, US	2019-06-27	"This place is one of our favorite spots"
Jeff Pauldine	thousand oaks, CA	2019-06-27	"I have been going to oceano dunes for over 30 years and I want to keep going."
Jean Graves	Atwater, CA	2019-06-27	"I love this place, great memories were made here."
Brian Hernandez	Dinuba, US	2019-06-27	"I like going to the dunes and it's fun"

Name	Location	Date	Comment
Pablo Botello	San Jose, CA	2019-06-27	"Me"
Sugey Campos	Santa Clara, CA	2019-06-27	"Sugey Campos"
Cecil Etheridge	Merced, CA	2019-06-27	"This is a great family/friends place and u get to camp on the beach that's cool"
Jared Carpenter	El Cajon, CA	2019-06-27	"Because the California government cannot run a single program correctly. They would end up screwing this up and asking for more taxes to do it."
Stephanie Newman	Bakersfield, CA	2019-06-27	"I want to be able to take my children out to camp on the beach and make memoriesso sad :( hope they dont take it away."
Kt Gurley	Tujunga, CA	2019-06-27	"My husband will be sad."
Ed Pilkington	Santa Maria, CA	2019-06-27	"I am signing because, it is time to stop the Communist Boxing Americans into corners. Environmentalists are only wanting to gain more Control over People by using these little bit of intrusion on our Rights and Freedoms."
Shelly Vick	Taft, CA	2019-06-27	"Our family has been camping here for over 40 years . This is where people make lasting memories . If this is closed ; the whole area will be a ghost town because it brings in a lot of revenue . Please do not close!"
Casey Scherer	Auburn, CA	2019-06-27	"I will not let communists take "OUR" land."
Carolyn Sherman	Hollister, CA	2019-06-27	"I want open access to government owned land! We The People own it; we the people should have access!"
Jamie Heaton	Ridgecrest, CA	2019-06-27	"The earth is toast anyway. Republicans are hellbent on destroying the environment and the habitability of the planet we rely on. Let us at least enjoy the dunes before Mad Max sets in."
Amy Hale	Murdock, KS	2019-06-27	"I believe in the cause"
Craig Brown	US	2019-06-27	"Our parts paid for by the people for the enjoyment of the people.  Oceano Dunea should remain open to the large off roasting community to enjoy."
Cheryl Brown	Arizona	2019-06-27	"I can"
Shawn Lorei	Twentynine Palms,	2019-06-27	"Parks are for the people. Let's keep it that way"
Sergio Rojas	Valley Center, CA	2019-06-27	"I love and use ohv recreational all the time if it worn for ohv area's I'd be up to no good on the street's."
tammy hamon	Modesto, CA	2019-06-27	"Love the Dunes!! Great family time!!"
Shannon Doherty	Sacramento, CA	2019-06-27	"These places need to be saved"

Name	Location	Date	Comment
Robert Melton	Fresno, CA	2019-06-27	"We cannot allow recreational areas, those of which are rare as it is, to be stripped away from so many off road enthusiasts!"
Alan Reitz	Bradley, CA	2019-06-27	"I believe the dunes should remain open to recreational vehicles."
Jacob Jones	Costa Mesa, CA	2019-06-27	"Quit shutting our riding areas down!!"
Patricia Rodriguez	Salinas, CA	2019-06-27	"My family and friends visit the dunes multiple times a year. Our kids enjoy visiting pismo being on the beach riding quads and hanging out with friends."
Kevin Brooks	Santa Paula, CA	2019-06-27	"I grew up riding, camping, and enjoying this beach."
Renee Chavira	Gilbert, AZ	2019-06-27	"A place that ive been going for many many years even after i moved out of state. Its a great place to ride have fun and its a 2nd home to me."
Alicia Valla	US	2019-06-27	"My family loves camping at oceano dunes for fathers day and labor day."
Theodore Smith	Lompoc, US	2019-06-27	"Why would they get ride of this place makes lots of money and keeps people off the streets"
Christine Humiston	Ripon, CA	2019-06-27	"The dunes need to stay open to ATV's."
Silvia Tejeda	Los Angeles, CA	2019-06-27	"My family goes to Océano Dunes SVRA several times a year, it's a family tradition that my 2 year old loves now."
Matthew Burke	Arroyo Grande, CA	2019-06-27	"We need to keep the dunes open"
Max Schenk	OAKLAND, US	2019-06-27	"This place is important to the off road community and jet ski community, this shouldnt be taken away from the people."
beth brokken	Ventura, CA	2019-06-27	"I have been coming to Pismo Beach to rent Quads (Used to be 3 Wheelers) for over 30 years! After that we would go to lunch or dinner depending on the time of day and enjoy some ice cream as well. Please don't shut down this wonderful family fun experience."
Taylor Mettill	US	2019-06-27	"I grew up camping and riding dirt bikes."
cody manring	Las Vegas, NV	2019-06-27	"I love the dunes here"
Cody Couturier	US	2019-06-27	"I love off road parks"
Daniel Sanders	Apple valley, CA	2019-06-27	"Did a lot of riding here hate to close it down"
Kaya Phelps	US	2019-06-27	"Kaya phelps"
kim ruiz	Delano, CA	2019-06-27	"We LOVE Oceano Dunes!!!"
Kimberly Bautista	Merced, CA	2019-06-27	"Pismo has always been such a great place for me and my family . Such a great place to let loose and be with family . I go every year for about a week . It saddens me that it will be closing"

Name	Location	Date	Comment
Don McLean	Arroyo Grande, CA	2019-06-27	"They've been taking away more and more of the beach they're not going to stop until nobody's there anymore. there's so many people that have invested to go there and have a good time. what would people think if they decided to close Lopez lake just because somebody wants to. the state knows what it's doing it's all a game.maybe if it was boycotted for a while and nobody went there and they started losing money. Get everybody together and pick it the beach once businesses start losing money and they start complaining to the county then people might listen. If it wasn't for that area at that Beach what would that area be. I don't see anybody going to oceano to hang out if it wasn't for the dunes nobody be going there."
Angela Volz	Quail Valley, CA	2019-06-27	"Riders deserve to ride"
Nic John	Oakdale, CA	2019-06-27	"That city would go bankrupt without the dunes to ride at and so many people would be out of a place to ride"
Sondra Creed	Simi Valley, CA	2019-06-27	"I'm signing because it is important to keep areas open so those of us that live outdoor sports have places to go enjoy our vehicles in our state."
Shad Eastham	East kings Cyn, CA	2019-06-27	"I would hate to see this go away. I do believe there should be Stricker laws to aliminate people trashing the dunes like they are now. Mainly to many people at once and the trash being left behind is a joke. They wunder way they want to close it. Find a way to keep it open."
Paul McClellan	Concord, CA	2019-06-27	"Helping out the Debski!####"
I Support	California	2019-06-27	"Ohv is already restricted. I live in Ventura county and have to drive more than 60 miles just to have fun that's ridiculous considering all the low income housing and other stupid things being built . Why not use some of the land for people to enjoy their off road vehicles ? As far as Pismo . People complaining about the dust need to go sit on the pot and blast off to never ever land and not have to worry about a single thing . All you rich , complaining people with nothing else better to do go live in a place where you won't be bothered simple as that ."
Mitch Hammond	Alameda, CA	2019-06-27	"I have and still use OHV at Pismo Beach. It needs to stay"
Serina Antunez	Santa Maria, CA	2019-06-27	"My dad will always take us to the dunes to ride and just to be around family and friends"
Lyzeth Gutierrez	Perris, CA	2019-06-27	"Keep the dunes open that is home to most people that always go there"
Emily Elkins	Sparks, NV	2019-06-27	"Emily elkins"
Rhonda Rollins	Morgan Hill, US	2019-06-27	"My children have gone for years to enjoy riding sand rails and camping on the beach. Now they want to take their babies when they get a little older. There are so few places leftif any like thisin California where families can enjoy the fruits of their labor. Why deny them? Why deny us all? I'd like to go as well to experience it

Name	Location	Date	Comment
			through the eyes of my grandbabies. There's so much more to this placethere's generations and traditions and memories. There's laughter and lovepast, present, and future. To shut it down is to shut down way more than a place. Some things just shouldn't be done."
Kyle Budd	El Dorado Hills, CA	2019-06-27	"I'm tired of people building homes and moving I close to tracks and places to ride then get them shut down. My family been going to pismo for generation. We have already given up so much of pismo enough is enough!!"
Daphanne Peters	Yuba City, CA	2019-06-27	"I can."
Debbie Sandhurst	Roseville, CA	2019-06-27	"The dunes belong to the people. There are so many of us who appreciate them and leave our campsite cleaner than we found it. We respect the outdoors and deserve to enjoy it"
Ranay Burton	Madera, CA	2019-06-27	"Our family has been going to Pismo Beach/Oceano Dunes for over 20 years. Lots of good quality family fun, no injuries."
Daniel Jensen	Huntington Beach, CA	2019-06-27	"It's the right thing to do!"
Eric Wittig	Visalia, CA	2019-06-27	"I bring my family there to camp and ride responsibly in the dunes. We bring well over \$120000 worth of trucks, campers and toys"
Alexis Baze	Madera, CA	2019-06-27	"This is a place my family and myself have come for years to enjoy the beauty of the central coast. Camping, riding quads and enjoying the dunes is an experience I hope to share with my future kids."
Jason Manning	US	2019-06-27	"Because its AMERICA AND WE HAVE rights to our land"
Bruce Routt	Bishop, CA	2019-06-27	"It's sad that California wants to close all these nice areas. This is a great place that I have been visiting for over 50 years!!!"
Gary Michael Arellano Jr	Los Angeles, US	2019-06-27	"I grew up riding there, it is a beautiful camping place"
Edward Williams	Rancho Cordova, US	2019-06-27	"Rode there as a kid and want to take my family there some day."
Alfredo Garcia	Phoenix, US	2019-06-27	"Growing up in the Central Valley used to drive to the pismo dunes it was a right of passage into manhood!!!!"
Debra Dorsett	US	2019-06-27	"In support for a good cause"
Marsha Hiatt	Madera, CA	2019-06-27	"We love going there!"
Conception Martinez	Lemoore, CA	2019-06-27	"It's wrong"
patrick leeper	Prescott Valley, AZ	2019-06-27	"Although I live in Arizona now, I grew up riding dune buggies in the Oceano dunes- some of the best times!!! Camping on the beach and duning!!! It appalls me to think ANYONE would consider shutting this area down!!!"

Name	Location	Date	Comment
Christian Cruz	San Francisco, US	2019-06-27	"Don't close the dunes!"
Kim King	Clovis, CA	2019-06-27	"Kim King"
Patricia Ellis	Yorba Linda, CA	2019-06-27	"It's important to keep family traditions going and I have great memories of going dirt bike riding and keep riding with my family."
lynn williams	bakersfield, CA	2019-06-27	"Many years and great times with family and friends.want to keep sharing family and friends times"
Vanessa Reis	San Leandro, CA	2019-06-27	"We live in America , LAND OF THE FREELand of the free Understand ?"
Renee Mohr	Loomis, CA	2019-06-27	"This states is taking away much more than riding the dunes. How about your medical rights? Yes, SB276 passed! A state official has more rights than your Dr for you!"
Raymond Hidalgo	Goodyear, US	2019-06-27	"Grew up there and the coast would lose alot of money if the dunes were to be shut down."
Brandon Simons	US	2019-06-27	"Stop taking away are fun for the people that like to have fun camping and riding, driving in the dunes"
Kristina Feldman	Antioch, CA	2019-06-27	"Kristina Feldman"
Courtney Wilson	ventura, CA	2019-06-27	"Im signing this because this place has always been a great weekend getaway for families"
Landin King	Clovis, CA	2019-06-27	"I'm signing because my self is a person who lives the dunes to take my family to and use the recreational side of it but that's only part of it all of the local business nearby will suffer and actually have to close, and a lot of family will suffer"
Sean Milam	Orange, CA	2019-06-27	"I'm signing because everyone deserves the right to access, whether hiking, on a horse, ebike or moto."
Jesse Schweiger	Clovis, US	2019-06-27	"I'm tired of California closing everything down"
Charles richards	Crestline, CA	2019-06-27	"I have been going to the Dunes from Bass Lake California since I was 12 years old in 1994. It was my first beach camping experience. It's where I fell in love with my girlfriend now wife of 14 years. It's where I plan on taking my children camping and riding. It's where I plan on taking my grand children. This is a place where people can enjoy nature from big hills to the beautiful ocean. I can't express how sad this would make me and our family."
Joanna Jordan	Newman, CA	2019-06-27	"Joanna J Jordan"
Suzie Cortez	Bakersfield, CA	2019-06-27	"To voice my opinion to keep Oceano sandunes open."
Cory Crist	Grover Beach, CA	2019-06-27	"I want to be able to still go to the beach"
Dennis Radke	Shandon, CA	2019-06-27	"I'm signing because I'm not gonna get kicked off these God givin sand dunes. not ever !!!!"

Name	Location	Date	Comment
John Bugni	Visalia, CA	2019-06-27	"Pismo dunes belong to the people and ohv use has minimal impact."
Gregory Bell	Lompoc, CA	2019-06-27	"I grew up going offroading at the oceano dunes!!! Lets keep this going!!!!! Dont let stuoid peoples mistakes affect our responsible off-roading!!!!"
mike lewis	Temecula, CA	2019-06-27	"It makes America Great to be able to ride."
nick panissidi	Sparks, NV	2019-06-27	"We love visiting Pismo. Enough has already been closed off."
Cindy Corral	Denver, CO	2019-06-27	"I loved the dunes as a kid"
Jennifer Frederick	Visalia, CA	2019-06-27	"this is one of the only beaches like this in the nation!! we need good recreation areas"
dawn swann	Springville, CA	2019-06-27	"I want it to stay open"
caryl tischbirek	Bakersfield, CA	2019-06-27	"It should stay open and available"
Dennis Radke	US	2019-06-27	"I'm signing because I'm not gonna get kicked off these God givin sand dunes. not ever !!!!"
Chad Miramon	Atascadero, CA	2019-06-27	"Chad Miramon"
Rodney Allen	Chariton, IA	2019-06-27	"I love riding ATV's"
Derek Hinojosa	w covina, CA	2019-06-27	"if its important to Ryan it must be important."
Sebastian Barrera	Castro Valley, US	2019-06-27	"Come on ppl we gotta show them we strong and we ain't going anywhere"
Dana Anderson	Lemoore, CA	2019-06-27	"I go there every summer with my wife and kids"
Shawna miller	Santa Cruz, CA	2019-06-27	"This meeting is scheduled on the 5th anniversary of my daughyer being killed in a car accident. This was one of our favorite places together. I truly saddened by this. Im ggoin to try and find a way to go to this meeting to help keep a little part of my daughter alive through hopefully helping to keep this place open."
Ronald Saumers	Canyon Country, CA	2019-06-27	"We need designated OHV areas. This place has been there a long time. Why take it away ?"
Kenneth Hjerpe	Saint Petersburg, FL	2019-06-27	"I'm signing as my nephew has autism and this is one of the places he enjoys."
Debra Lee	Madera, CA	2019-06-27	"I'm 63 years old and have many good memories camping on the beach as a kid with my family. Oceano would lose a lot of revenue"
Tia Hightower	Tucson, AZ	2019-06-28	"I support my son Kirk Travis who believes strongly about this issue."
Mike Gerondale	Glendale, AZ	2019-06-28	"We must protect the previously agreed upon riding rights."

Name	Location	Date	Comment
David Newton	US	2019-06-28	"I love riding and camping and you can't take away so much joy from people."
Farva Diverse	Anaheim, CA	2019-06-28	"Its always been our right to off road here and enjoy the area. As long as we keep the area clean and respect the views and environment"
Bee siong	Fresno, CA	2019-06-28	"I love oceano dunes and I cant imagine a summer without it."
Michael Johnson	San Jose, US	2019-06-28	"I really hope this doesn't happen smh!"
Austin Owens	Hesperia, CA	2019-06-28	"Because it's the best riding and everyone should be able to experience it!"
Brett Christensen	Utah	2019-06-28	"It is important to keep our recreational areas open to use."
Fabiola Sanchez	Sylmar, CA	2019-06-28	"This is a safe place where I can see my kids ride."
kevin helton	Oxnard, CA	2019-06-28	"We are running out of places to have fun and go camping"
Dion Mitchell	Palmdale, CA	2019-06-28	"It's a way of lifeI learned to ride out there when I 8now my girls ride as wellour rights are not being treated fairlydon't take our family traditions away"
Trevor Cunningham	San Diego, CA	2019-06-28	"Closing the dunes is nonsense. It's good for the local economy and isn't hurting a thing."
Gerald Hooper	San Felipe, BCN	2019-06-28	"This is dead wrong"
Dion Mitchell	Palmdale, CA	2019-06-28	"It's not fairour family traditions will be ruined"
Kimberly Wright	San Luis Obispo, CA	2019-06-28	"Oceano Dunes is near and dear to my heart! To close this park would be a travesty. Not only is it a fabulous place for families to recreate, the park generates tremendous tourism and brings so much revenue to every surrounding town. Such a shame a select few have to ruin it for so many!"
Jamie Joel	Austin, TX	2019-06-28	"Activities such as these more often than not are illegal except on a race track and motor enthusiasts are not all professional drivers. And these types of activities are great for children& teens by giving them an outdoor activity that can eliminate their use of drugs as a recreational activity"
Chris Bates	Maxwell, IN	2019-06-28	"Because"
Heather Williams	Porterville, CA	2019-06-28	"You take away the dune access and you destroy the local economy.Save peoples jobs and keep the dunes open!"
Trenton Gantt	Winter haven, US	2019-06-28	"It's my life"
Fabiola Sanchez	Sylmar, CA	2019-06-28	"This is money for the community. Why would you take it away!?"

Name	Location	Date	Comment
Dan Sargent	Lakewood, CA	2019-06-28	"I've been there, camped there, rode my quad responsibly, and I want to go back and do it again, and others should be allowed to, responsibly, and respectfully as well."
Jessica Monson	Woodlake, CA	2019-06-28	"I'm signing this petition to protect our camping and OHV rights!"
Brandon Brewer	Mission Viejo, CA	2019-06-28	"I love the area and enjoy taking friends and family out in the dunes on dirtbikes, trucks , and quads for some good, clean, family fun! They have already shut down part of the dunes for the funny bird that nests on the ground. Leave some access to OUR PUBLIC lands for the off-roaders to use please!"
Tom Brosna	Palo Alto, CA	2019-06-28	"It's a great place for families!"
Zaven Keusseyan	Santa Monica, CA	2019-06-28	"Oceano Dunes is already the ONLY place in California where driving on the beach is permitted! and it is a PERFECT location for that! Please do not take this right away from us!!"
Jeff Robinson	Peoria, AZ	2019-06-28	"BecauseIt is the "right" thing to do"
george stephens	Isleton, CA	2019-06-28	"Our beaches should be open to all."
Tana Coffey	Tehachapi, CA	2019-06-28	"Our family loves camping and riding here and many families have a tradition of camping there every summer!!!"
Rodney Brown	Ceres, CA	2019-06-28	"This state needs to leave our ohv parks alone"
Sandy Landrum	Coalinga, CA	2019-06-28	"Sandy LandrumKeep the dunes open!"
Kenneth Mer	Madera, CA	2019-06-28	"Kenneth Mee"
Justin Faucett	Visalia, CA	2019-06-28	"I love this place sooo much!!! I have 3 kids with special needs and they absolutely love the dunes and going out on the Razer!"
DARYL ROSENBERG	Atascadero, US	2019-06-28	"If they close this park for OHV, over 200 million dollars is spent locally each year. Loss of job and the impact on the economy will be impacted in a big way."
Patricia Jacob	Baltimore, US	2019-06-28	"I believe in it."
Robert Dean	Visalia, CA	2019-06-28	"Leave The Dunes Open! Ya don't close a city everytime an incident occurs, you address the problem, not removin all taxpayers from a prime recreation area on our California coast .Robert Dean"
James Merryman	Compton, CA	2019-06-28	"I want to help my friend."
lori cervantes	Simi Valley, CA	2019-06-28	"I love this place"
Eric komornik	Bay Shore, NY	2019-06-28	"People need a place to ride and enjoy there all terrain vehicles"
Robert Crystal Smith	US	2019-06-28	"Robert Smith"

Name	Location	Date	Comment
Jeffrey Grijalva	Costa Mesa, CA	2019-06-28	"We go to oceano dunes (Pismo) every year. It's a fun place for my family and friends to get together and enjoy some camping and riding."
Jessica Garza	Granada Hills, CA	2019-06-28	"I vacation there twice a year."
Nick Russ	Livermore, CA	2019-06-28	"I really want to be able to see this off-road adventure area stay open, but we as people really need to start cleaning up after her selves and throwing away our trash and stop them. It's pretty damn simple. Don't be a pig. Your mama doesn't work there, so she's not going to pick up the beer candy you be playing around in the sand."
Brandon Lopez	Bay point, US	2019-06-28	"There is not much places to have fun with our atvs around the Bay Area and every year all our family likes to go on trips to pismo beach and enjoy the beautiful view while having fun with our motorcycles and we would all be very traumatized if it were to be closed down."
Jose A Zepeda	Palmdale, OR	2019-06-28	"Please keep Oceano dunes open, best place to camp and ride with the whole Family, we been going there for years we love it"
David Reeder	San Marcos, CA	2019-06-28	"Pismo should stay open to OHV's. It has been for quite some time. I have been going there since I was a kid."
Gina Clark	Fresno, CA	2019-06-28	"We need places like this where we can have fun and make memories with our friends and family."
tim williamson	Ely, MN	2019-06-28	"Because the state of California has no right to take away land from the citizens of america"
Michael Magoon	El Cajon, CA	2019-06-28	"I am signing because I believe they should keep it open!"
Kyle Johnson	Sacramento, CA	2019-06-28	"I ride recreationally and enjoy the outdoors. OHV are a strong pastime and a good way to enjoy the outdoors."
Connor Bright	Santa Maria, CA	2019-06-28	"It's one of the greatest places on the central coast , I'd hate to see it go"
Rhonda Smith	US	2019-06-28	"Memories made here are lifelong"
Sharon McKinzie	Concord, CA	2019-06-28	"Sharon McKinzie"
Larry Higgins	Edmond, OK	2019-06-28	"Larry Higgins"
Elizabeth Mumby	Dos Palos, CA	2019-06-28	"This is my family's best memories we all ride and love riding at pismo"
Mario Perez	Sacramento, CA	2019-06-28	"Because the Dunes belong to the People!!!"
Ashli Mahan	Stockton, US	2019-06-28	"Ashli"
Cheryl Weber Hundley	Camarillo, CA	2019-06-28	"Cheryl hundley"
Troy Langlo	Rancho Cordova, CA	2019-06-28	"Learned to ride here at 4. Keep it open!"

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Jeremy Young	Modesto, CA	2019-06-28	"I have spen much time at this area from a kid to now taking my kids there. I have many special memories there please don't take that away from us"
Tammy Speaks	Bakersfield, CA	2019-06-28	"I Love the area"
dan clark	North Bend, OR	2019-06-28	"This is a joke right smaller less restrictive govt"
Janice Imbronone	Winchester, CA	2019-06-28	"Janice Imbronone"
Chris Watts	Corona, CA	2019-06-28	"Because we love riding on the beach. Its the only place where we can."
Ron Staley	Porterville, CA	2019-06-28	"Because it's always been there for people to have camp, ride and have fun."
Susan Gonzales	Ione, CA	2019-06-28	"Susan Gonzales"
Angelica Venegas	Arvin, US	2019-06-28	"Beautiful place to camp and have fun with family and friends"
Joy-anne green	Oroville, CA	2019-06-28	"Joy-Anne Green"
Gabrielle Neil	Bothell, WA	2019-06-28	"This place has been instrumental in providing my family a positive place to expend energy"
Brody Gies	Clovis, CA	2019-06-28	"I've been a long time visitor of pismo dunes"
Diane Alexander	Lawndale, CA	2019-06-28	"Diane Alexander"
Jeff Porras	Arroyo Grande, CA	2019-06-28	"I'm signing because the dunes have been a part of my life when I was growing up and now I share the dunes with my wife and 9 yo daughter. It would be terrible to loose a place that has given me such great memories and could keep giving amazing memories, not just me and my family but so many families over the future years. Please keep the Oceano Dunes SVRA open!!!"
Ryan Johnson	Elk Grove, US	2019-06-28	"There is no point in closing them"
Jay Thomas	Salem, US	2019-06-28	"Вгааааааррр"
Aimee Emery	Merced, US	2019-06-28	"Family traditions shouldn't have to end, over 40 years of family coming from all over California to be with each other at pismo. It would be devastating."
Mike Koblis	Lake Forest, CA	2019-06-28	"Mike Koblis"
Hannah Downing	Madera, US	2019-06-28	"We go to the dunes twice a year. My whole family, far and wide, meet here for a few days to spend time together and have fun. Please don't take it away from us and other families alike"
Karena Henry	Santa Maria, CA	2019-06-28	"Why because of the stupid they should be prosecuted not the rest by making it a closed beach"

Name	Location	Date	Comment
Chris Roberts	Downey, CA	2019-06-28	"We deserve a place to ride and enjoy just like our past generations. Just regulate it more if you have too. Help get rid of drunk drivers on the beach. Not our privilege to ride or drive there"
Jennifer Bucolo	Lake Havasu City, AZ	2019-06-28	"This is a place to build memories for generations, not one bad memory and plenty of family trips!"
Vladimir Jigounov	San Jose, CA	2019-06-28	"This is one of spots that makes California coast famous around the world. People are coming all across the globe to have this experience."
Elvira Platas	Wasco, CA	2019-06-28	"I don't want them to close océano dunes because my family enjoys going there it's an every summer thing. We love going out there with the family we enjoy every moment and thts how it should be"
Marcella Anderson	Arroyo Grande, US	2019-06-28	"Need to keep open for future generations"
Bob Litzlbeck	Carlsbad, CA	2019-06-28	"I believe in being able to enjoy the dunes for camping and riding quads. My kids love it and we always make new friends. It's a great place to share the outdoors with others."
Carmen Trenner	San Jose, CA	2019-06-28	"Carmen Trenner"
Lori Hutchison	Tracy, CA	2019-06-28	"Raised my kids on bikes and sand toys. They were their protective gear, and even had license from DMV."
Jason Ford	Odessa, TX	2019-06-28	"I'm signing because I strongly believe there's no reason to close this attraction and the reason they want to close it is all because the Democrats are idiots and jealous."
Sherry Brown	Newbury Park, CA	2019-06-28	"thats where we vacation. if you close the dunes we won't be coming anymore"
Lateishia Berry	Bakersfield, CA	2019-06-28	"Love going to the dunes!"
Joe Rodriguez	Ontario, CA	2019-06-28	"This places are met for us to enjoy and protect. This is where great memories happen and we can get away from our business lifestyle enjoy been outdoors."
Pat Gerber	Bakersfield, US	2019-06-28	"Many years and generations have been enjoying camping and riding on the beach including our family and friends. Many years of good times and lasting memoriesand relationships. Gotta keep this open for the future."
Nate Volk	Kahului, HI	2019-06-28	"Lots of good memories there that I'd like to see the next generations have available to them"
Diane Donnelly	Fresno Ca USA, CA	2019-06-28	"It's the right thing to do."
Jacob Gonzalez	Lompoc, CA	2019-06-28	"Don't close the dunes we need access to all of our beaches!"
Mike Hanaway	US	2019-06-28	"Because Dave Irby & Zak Kriegel like to camp there."

Name	Location	Date	Comment
Carl Tucker	Loma Linda, CA	2019-06-28	"Over 4 decades and now they want to end this no no no. Get grumpy grandma and grandpa another spot at the beach."
michael inacio	Grover Beach, CA	2019-06-28	"Michael inacio"
Eric Filar	US	2019-06-28	"I am in opposition of closing the oceano dunes to motorized vehicles. Thank you,Eric Filar"
KC Stone	Modesto, CA	2019-06-28	"40 yrs of families and friends gathering for fun and togetherness! Home owners signed releases on dust and noise in the area i order to buy don't buy there if you didn't want to accept what was there long before you."
Tim Halsmer	Byron, IL	2019-06-28	"I support riding!"
Joel gomez	San Jose, CA	2019-06-28	"My family has camped on beach since the 80s was just there two weeks ago"
Austin Cantalini	Oakley, CA	2019-06-28	"My whole family enjoys the sport and this beautiful location"
Barbara Dyer	Nipomo, US	2019-06-28	"Barbara Dyer"
Jimmy Acosta	Los Angeles, US	2019-06-28	"Started camping their in 1998. Have an annual trip we do with the family every year."
sharon robinson	jackson, CA	2019-06-28	"Last place to ride an OHV's at the beach in California!"
Ty Miller	US	2019-06-28	"Fuck it, why not"
Anthony Dal Canto	San Jose, CA	2019-06-28	"Love riding out there"
deanna cuevas	Post Falls, ID	2019-06-28	"It a place where I grew up. And have so many memories I would love to share with my children"
john christopher iniguez	Van Nuys, US	2019-06-28	"Saquen la bolsita!!"
Duran Gaddy	Yucaipa, CA	2019-06-28	"My family has been camping at the Oceano Dunes for most of my life. The sand in the air has increased in that time frame. The addition of wealthy people's homes should lock out recreational users."
Robert Wright	Modesto, CA	2019-06-28	"We all deserve a place to run our machines and enjoy the beach. We have 1 small area to enjoylet us enjoy. The majority of us have nothing but respect for nature and habitats"
Kevin Jordan	Santa Maria, CA	2019-06-28	"Kevin M Jordan"
Sara Powers	Los Angeles, CA	2019-06-28	"Because your making it harder for families to do activities together by closing places like this!"
Rogelio Valdez	Lorane, OR	2019-06-28	"I grew up riding quads and many of my memories growing up happened at the dunes. It would be a shame for my children to never experience the dunes."

Name	Location	Date	Comment
Heidi Wysong	Lake Forest, CA	2019-06-28	"I have been coming here as a child. It's a very sad day if this closes."
Robert Ray	Tulare, CA	2019-06-28	"Me and my family go there alot"
Phyllis Thomas	Fresno, CA	2019-06-28	"Because it's always been recreational for thousands over the years, and why close it now.?"
kimberlee wallace-kukuczka	sunland, CA	2019-06-28	"I love going riding here."
Shawn Holloway	Hillsboro, OR	2019-06-28	"This place is a one of a kind recreational area that cannot be replaced."
Susan Straughn	US	2019-06-28	"Susan Straughn"
Damian Cran	Loveland, US	2019-06-28	"Let people ride and have a good addiction instead of drug addictions!!!!"
Brian John	Rancho Cordova, US	2019-06-28	"You have literally every other square mile of beach in Cali for a strip mall/lounge area. Throw a dog a bone."
Trenton Kemps	Madera, CA	2019-06-28	"Save the dunes and pismo community"
Robin Marroquin	San Diego, CA	2019-06-28	"We need to stand up and claim our land use rights. Little by little our land rights are disappearing."
Ty Hosman	US	2019-06-28	"Everyone who enjoys outside time and loving the freedom that all our forefathers fought and died to protect ought to sign this. First Pismo, who knows what could be next. Help save the world for human enjoyment!"
Joe Cardenas	Riverside, CA	2019-06-28	"We need our public lands so we are able to enjoy them"
Bob Ericsson	Fallbrook, CA	2019-06-28	"We've been going there for 40 plus yeas is a part of the family life style. To shut it down would have a huge impact on our family."
David Gagen	Portland, US	2019-06-28	"I ride the dunes to get away for a vacation, they provide a much better experience for myself as well as for my friends and family when playing on our atvs or dirt bikes"
Frank Stagno	Stockton, CA	2019-06-28	"I love pismo"
gary hooper	livermore, CA	2019-06-28	"Ill fight"
Latricia Saucedo	Visalia, CA	2019-06-28	"I dont think it should be closed"
Michael Delgado	Florissant, MO	2019-06-28	"Top place to go when I visit"
Luis Munoz	Fort huachuca, AZ	2019-06-28	"Drsxf"
Bob Fleege	Council Bluffs, IA	2019-06-28	"We need to protect our right to ride and camp."
Diane Boka	US	2019-06-28	"Diane Boka"

Name	Location	Date	Comment
Kelly Flowers	Merced, CA	2019-06-28	"Because me and the family go every summer"
Ray Dunmore	Sparks, NV	2019-06-28	"It's not right for the government to take from the people"
Mike Sons	Oakdale, CA	2019-06-28	" I feel if they were to raise the rates they would get rid of some of the riffraff to the people that did not respect the dunes But 99% of the people that come there respect the beach enjoy it and never ride in the wind so they do not cause the sand to blow into the homes west of the dunes I think we need to stand strong and fight for what we love to do"
Catherine Himpelmann	Redlands, CA	2019-06-28	"Catherine Himpelmann"
Chris clausen	Porterville, CA	2019-06-28	"its a very bad idea to shit it down."
Autumn Mitchell	Bakersfield, CA	2019-06-28	"We love camp and riding ORV on the dunes."
Phil Green	Cedar City, UT	2019-06-28	"Sand dunes are a great place to build memories"
Patrick Salen	Fair Oaks, CA	2019-06-28	"Because California government is garbage!!!"
Elizabeth Webb	Victorville, CA	2019-06-28	"I always loved camping on the beach and riding with my family and I want my baby boy to be able to experience the bonding that comes with it."
David Quiroga	San Luis Obispo, CA	2019-06-28	"I've ridden up there's my whole life pismo is a great camping area. Also many families go there for big events and you can't take away something everybody loves"
natasha cole	las vegas, NV	2019-06-28	"I'm signing this because I grew up on these beaches an dunes with my family when I was young an spent every vacation an summer camping here."
Salvador Orozco	California	2019-06-28	"To keep open"
Blaine Johnson	Sun City, CA	2019-06-28	"Off highway access is precious and limited. All current access should remain accessible and more areas should be opened up."
Melissa Lockhart	US	2019-06-28	"This is our all time favorite camping spot. I want my daughter to enjoy this as her vacation spot too!"
Tony Slaughter	fresno, CA	2019-06-28	"Gonna break a lot of hearts if the off-road expertises taken away."
Antonio Rodriguez	Ventura, US	2019-06-28	"Pismo shouldn't change"
Kyle Paquin	Sacramento, US	2019-06-28	"I love this place!"
Braulio Cuenca	Clovia, US	2019-06-28	"Love going here as a kid and want to keep it going with my kids and grandkids"
Sarah Sims	Ojai, CA	2019-06-28	"Because fuck the people who want to close pismo down!!! Keep it open!!!!!!"

Name	Location	Date	Comment
Donna Lagueux	Fountain Valley, CA	2019-06-28	"I'm signing because I love riding an want a place to ride with friends and family"
Tommy Edwards	El dorado hills, CA	2019-06-28	"Pismo is an awesome place!!!"
David Golub	Allied Gardens, San Diego, CA	2019-06-28	"This is one of the few spots where OHV vehicles are allowed to ride along the coast and it should not be taken away. It provides a safe, legal and positive environment for off road enthusiasts."
Peter Giusti	Novato, CA	2019-06-28	"Off road riding is popular with tax paying Californians yet our land continues to be taken away from us. OHV use brings friends and families together for good clean enjoyment of our beautiful outdoors"
Angelina Miller	Dixon, CA	2019-06-28	"We need our freedoms protected, plus It's an awesome job opportunity for lots of people of the government thinks about it"
Hector Aranda	Santa Ana, US	2019-06-28	"My Family is being going there for many years! Keep it open!!!"
Miguel Corona	Victorville, CA	2019-06-28	"These dunes are epic!"
Jerry Osterloh	Hemet, CA	2019-06-28	"This has been an OHV area since before the Coastal Commission even existed. Keep it open!!"
Alana Gutierrez	Sanger, CA	2019-06-28	"It's always been a part of life, with ohv since I was just a little girl. Now as an adult with a baby of my own who's been there. It's not our fault that people are too irresponsible to have spotters or that go out there and don't know how to ride"
Rachelle Beeson	Roseville, CA	2019-06-28	"I grew up going to these dunes and love sharing it with my kids"
Alicia Steagall	Modesto, CA	2019-06-28	"I love watching my boyfriend ride motocross and his friends it makes them happy and stress relief."
Sanford Unruh jr	Walnut Creek, CA	2019-06-28	"I don't want this to go away."
laura Bartosz	Simi Valley, CA	2019-06-28	"Because we are running out of thing to do. If we respect the land we should be able to use it besides it's an American Icon."
Robert Wallace	Covina, CA	2019-06-28	"Save it all. We do our best to pick up after others!"
Andrew Church	Napa, CA	2019-06-28	"I want to keep the dunes open for all to enjoy"
Chyrellynne Espinal	Sebastopol, CA	2019-06-28	"My husband and his brother and friends used to camp and ride dirtbikes there as kids and teenagers. It's is something and a place that I also want my children to be able to have access to and love being. To take this away is very sad. It is a beautiful and fun place to be."
Anthony Guyker	Albuquerque, NM	2019-06-28	"We are loosing free space to do outdoor activities."
Tiffiny McConnell	Temecula, CA	2019-06-28	"My family uses this space often"
Brea Tillery	Bakersfield, CA	2019-06-28	"This is a fundamental right"

Name	Location	Date	Comment
Que Vincent	US	2019-06-28	"I agree"
Steven Dunn	Holly Springs, NC	2019-06-28	"I grew up riding at the dunes 1970-1980"
Ashley Reed	Bakersfield, US	2019-06-28	"We love this place , so many memories !!"
Paul Outfleet	fresno, CA	2019-06-28	"Our economy relies on this business. I do not believe there are environmental issues that are being damaged."
Francisco Flores	Avenal, CA	2019-06-28	"Because I love going with family out there"
Anthony Salmons	Smithton, MO	2019-06-28	"It gives people the opportunity to go places and enjoy time with family and friends."
Daniel Butt	Mesa, AZ	2019-06-28	"Daniel Butt"
Kevin baker	Reno, NV	2019-06-28	"Keep the dunes open. It keeps families united and kids out of trouble"
Lisa Houston	US	2019-06-28	"Lisa Houston"
louis mazza	Corona, CA	2019-06-28	"There are so few places to ride as it is. And now your taking more away. It's not right."
Heather Doty	Tioga, PA	2019-06-28	"Too many American rights have been taken away by Democrats already."
Riley Measom	US	2019-06-28	"Bullshit to shut it down"
Aric Barton	Los Banos, CA	2019-06-28	"Pismo dunes is an awesome place to spend time with your loved ones, and it brings strangers together making the community a better place."
Matt Olson	Union city, CA	2019-06-28	"I'm sick and tired of the war on OHVs and the constant over regulation by the state of CA"
Jane I	US	2019-06-28	"This is the best safe riding family place. We pay our OHV fees, etc. so places like these would be available to us. It's close to a town which we support the small businesses when we go. It's been a tradition to go there and I want it to be around when my kids have their own kids."
Kevin Cole	Big Bear City, CA	2019-06-28	"It is necessary to keep places like this available for riders."
Roberto Ortiz	Mexicali, Mexico	2019-06-28	"We need this spaces. And we need more!! All over California."
Joe Fellom	US	2019-06-28	"It's one of the things that that beach is known for you can't take that away"
Kyle Howthorne	Madera, CA	2019-06-28	"We actually need places to ride. Or you guys will have alot more people riding here illegally"
Ryan Tinstman	Winchester, ca., CA	2019-06-28	"Enough of your tree-hugging hippies get a life get over it"

Name	Location	Date	Comment
Andrea Fowler	Bakersfield, CA	2019-06-28	"I'm signing because these beautiful people have continued this tradition for many years. It has always brought families together for love and memories. Don't take this away. ! #FamilyGatherings#Traditions"
david Moore	Sacramento, CA	2019-06-28	"I love Oceano!"
MARISSA DAVISSON	Mesa, AZ	2019-06-28	"�"
Andrew Jones	Carson, CA	2019-06-28	"These environmentalists are going too far!"
Cassandra Quiroz	Los Banos, CA	2019-06-28	"I'm signing this because theyare taking away something we all enjoy! Many of us have traditions of spending time on the dunes! Camping out with our family and friends."
Roxanne Adams	Roseville, US	2019-06-28	"Roxanne Adams"
Jamie Depasquale	Van Nuys, CA	2019-06-28	"I have rode in the dunes since i was a kid and plan to do the same with my future kids. Closing the dunes would make many businesses lose annual revenue that they depend on to stay open with the loss of tourists that come every year for this one special place"
Richere-Anne Breault	Riverside, CA	2019-06-28	"Leave the little riding areas we have alone."
Terry Tagliente	Clovis, CA	2019-06-28	"Keep the dunes open OPEN"
Sharyn Mobley	Rancho Cordova, CA	2019-06-28	"I lived there for 34 years, and played in the dunes with our dune buggy for 20 years before that. This is absolutely disgusting to even think of closing the beach and dunes. The revenue lost will surely hurt the community and there's no reason to take this fun place away."
Erik Edeen	Los Osos, CA	2019-06-28	"We got keep the dunes open to OHV !!!!"
Mark Kully	Cazadero, CA	2019-06-28	"I love Pismo beach"
Jordan Gerbich	Santa Maria, CA	2019-06-28	"I live here, don't let ignorance ruin it for everyone."
David Acosta	Santa Barbara, CA	2019-06-28	"Merica"
sean mccarthy	bangor, US	2019-06-28	"its a place to have great time, i may not live there anymore but i want others to have a time like i did"
Aaron Cooksey	Apple Valley, CA	2019-06-28	"I'm an out doors riding adventurer. This is a place we enjoy our time."
megan fulford	Hollister, CA	2019-06-28	"I think designated ohv areas are a necessity. Without them people will recreate on protected lands causing more damage."
Shad Menezes	Clovis, CA	2019-06-28	"It has been apart of my family for many years!!!"
Todd Mackey	Taft, US	2019-06-28	"Should be thinking about opening more of the area up. You're going to destroy the community"

Name	Location	Date	Comment
Candice Wirts	Cottonwood, AZ	2019-06-28	"It's a good cause."
Annie Mills	San Pedro, CA	2019-06-28	"I raised myFamily riding and camping here. It would be a great loss to everyone if this is aloud to happen"
Kelly Harrison Hiebert	Perris, CA	2019-06-28	"Please don't take away this is great for families and keeps kids engaged and with the family"
Tim Hoag	San Leandro, CA	2019-06-28	"Pismo is a beautiful state park that all should be able to enjoy"
Glen Rhoten	Visalia, CA	2019-06-28	"Keepong them open is important. Having a safe place to ride is important."
Jenny Watts	Sonora, CA	2019-06-28	"It is the right thing to do"
Dolores Harris	Portland, US	2019-06-28	"Responsible people need to ride."
Greg Lewellen	Sonora, CA	2019-06-28	"It's what right!"
Gregory Carroll	Nipomo, CA	2019-06-28	"Gregory Carroll"
Lace Montgomery	Three Rivers, CA	2019-06-28	"We need to keep the Dunes"
Anne Fodera	Simi Valley, CA	2019-06-28	"This is a place I grew up going. I want to bring my kids here. We are loosing too many family friendly outdoor recreation areas. This area should not become some rich persons beach front property."
Robert arzate	Santa Maria, CA	2019-06-28	"We have grown up in the area and family times at oceano."
Eric Lavis	Dana Point, US	2019-06-28	"Eric Lavis"
Brennan Burns	Elgin, TX	2019-06-28	"My boy Kyz"
Linda Fry	visalia, CA	2019-06-28	"This is great family recreation! My son, his dad and siblings spent MANY weekends there growing up!"
Sean Conroy	Kings Beach, US	2019-06-28	"I love off-roading"
Todd Hooker	Camarillo, CA	2019-06-28	"Darren's a jerk"
Falynn Gonzales	Bakersfield, CA	2019-06-28	"Because we love to drive on the beach, and if the beach is closed to recreational vehicles, it will be detrimental to local businesses."
Dorothy Griswold	US	2019-06-28	"Our place for family fun"
Denene Palozzilo	New York	2019-06-28	"Denene Palozzilo"
Shelley Stewart	Bakersfield, CA	2019-06-28	"This is a nice fun place to take the family"
Connie Smith	Tampa, FL	2019-06-28	"I believe in this"
Glen Sanchez	Murphys, CA	2019-06-28	"We cannot continue closing everything. How do we enjoy these wonders if we cannot use them?"

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christine nunes	Bakersfield, CA	2019-06-28	"I Raised 8 kid's on these Dunes and Now I want my Kid's to Take there kid's to the Dunes. We have had Family Reunions and Birthday Parties for my entire family. I would be heartbroken to see them Close�"
Heather Malone	San Jose, CA	2019-06-28	"Keep! Please"
Daniel Congleton	Modesto, CA	2019-06-28	"I ride!"
Gavin Angello	Arroyo Grande, CA	2019-06-28	"I grew up there"
Garry Piatt	US	2019-06-28	"Because I am an avid rider and if you ride responsible we should be able to keep riding!"
Rayanne Ayala	San Jose, CA	2019-06-28	"My brothers and tons of friends go everyyear"
Steve Wilson	US	2019-06-28	"The dunes are a great place for family fun"
Dolores Martinez	US	2019-06-28	"It's a great for people to get away and enjoy"
Justin Harden	Foothill Ranch, US	2019-06-28	"I refuse to let anyone take away my right to camp and ride an ohv"
Maria crowe	Bakersfield, CA	2019-06-28	"I loved going there as a kid I want my grandchild to have as much fun on the dunes as I did"
Cody Cuson	Lansing, MI	2019-06-28	"Getting together with family and enjoying the sand dune is sand therapy!!"
Sunday Ballas	Santa Maria, CA	2019-06-28	"It's a fun recreational place to go."
scott arroyo	LA, CA	2019-06-28	"This is a place where people that love to ride take there families and Friends"
Karen Bush-Hutchison	Ashville, OH	2019-06-28	"My son's are riders, and they deserve a safe place to ride! There are tons of other beaches for swimming and non motor vehicle use!"
Melissa Conti	Gilroy, CA	2019-06-28	"Oceano Dunes is a place where we come together as a camping family with friends and loved ones. There is a distinct camping culture ever present and should continue for many generations to come."
Blake Calesa	Santee, CA	2019-06-28	"The memories and family traditions matter to many"
Chaize Rhodes	Las Vegas, NV	2019-06-28	"I belive this is a great activity to motivate kids to spend money on something besides drugs and alcohol"
Carol Mueller	Keizer, US	2019-06-28	"Family times together �"
Stephanie Smith	Bakersfield, CA	2019-06-28	"Because I grew up going to pismo and riding in the dunes."
Jose Martinez	Sacramento, CA	2019-06-28	"Jose martinez"
Ashley Ertel	Oxnard, CA	2019-06-28	"I grew up here. We took care of our home. Let others make the memories I got to. We love you Pismo!"

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Michael Owens	Apple Valley, CA	2019-06-28	"No take always!"
Stan King	Santa Ana, CA	2019-06-28	"I am for protecting the environment. However, balance is the way to do so. More than half of Pismo is already closed for preservation."
Eric Oneill	Menifee, CA	2019-06-28	"I peel out"
Matthew Chis	Costa Mesa, CA	2019-06-28	"This is a great place for families to enjoy camping and off-road vehicles. If you can't use them here where should you go?"
Rick Beardsley	Nipomo, CA	2019-06-28	"I'm signing because I live here on the central coast. Closing the dunes would be devastating to our local economy."
Dawson Wright	Riverside, CA	2019-06-28	"Don't let them fags take all are rights"
Kelly Hermida	San Jacinto, CA	2019-06-28	"Liberals have ruined this state !"
Unreal App	San Jose, CA	2019-06-28	"Been going here for many years and have such great memories, they have already closed off some and can't ever be content. Just more reasons why California is going downhill"
Adrian Gonzalez	Bakersfield, CA	2019-06-28	"Because"
jose gutierrez	Santa Maria, CA	2019-06-28	"Jose Gutierrez"
bryan Wisnosky	Mesa, AZ	2019-06-28	"It's a good thing"
Ray Ortiz	Morgan Hill, US	2019-06-28	"Ray V Ortiz"
Kelly Brawley	US	2019-06-28	"The outdoors are great why take that away from our youth"
Keith McNeel	Murrieta, CA	2019-06-28	"California needs to stop messing with the off road communities. Plus all the revenue lost from the off roaders and campers could have a huge impact in that community and surrounding businesses"
Sean Martin	Sedro-Woolley, WA	2019-06-28	"Public land needs to stay public land for all"
Barry Smith	Ojai, CA	2019-06-28	"It's not right to close it. People need a place for recreation. California has taken too much away from us already. It's a fun place to go."
shyla fourdyce	Bakersfield, CA	2019-06-28	"We have always gone to the dunes. That has always been a family event for us. As long as people obey the rules why close it down? Please keep it open. I mean it is only 1 area of the beach"
Kristin Hepner	Lewisburg, TN	2019-06-28	"Dumont is a home away from home #"
Alice Brewster	San Jose, CA	2019-06-28	"I love this place!"
Julieta Bejar	US	2019-06-28	"Julieta Bejar"
Kathy Cordeiro	Tulare, CA	2019-06-28	"This is our annual vacation with family and friends. Many great memories here."

Name	Location	Date	Comment
Jerry Avila	Tulare, US	2019-06-28	"My dad has just got a razor and my quad is finally running again"
John Huffman	Oakley, CA	2019-06-28	"We need more recreational ohv parks not less"
james cross	Creston, CA	2019-06-28	"The main reason I moved to Central Coast what is the most awesome places to ride in California"
Alejandra Aguirre	Fresno, CA	2019-06-28	"I enjoy Oceano dunes, it's a great getaway from the central valley!"
kyle Taylor	Battle Creek, MI	2019-06-28	"I'm from Michigan but have been dreaming for 3-4 years of going to Pismo with my prerunmer in the next 2-3 years"
Katie DePrater	Stockton, US	2019-06-28	"We've been going here for 20plus year as our family's annual camping trip!"
Eddie Rivera	Bakersfield, US	2019-06-28	"Let's hope they dont close it"
Christina Mawyer	Modesto, US	2019-06-28	"Annual vacation and it was one of my father in laws favorite places to go"
Lawrence Mitchell	US	2019-06-28	"I support this"
Linda Padian	Victorville, CA	2019-06-28	"It's my right to sign any petition I want to. Lol"
Jack Timm	Paradise, CA	2019-06-28	"We need to keep all rec areas open"
John Robinson	Palm Desert, CA	2019-06-28	"I'm signing because this beach and the dunes belong the people of California, so many families go to enjoy this place year round. I've been going there since I was a kid and there's no good reason enough to close it down. Put politics aside and give the people what they want and what they deserve. The freedom to enjoy Oceano!! Pismo Beach is the people's beach"
christian mentzer	Escondido, CA	2019-06-28	"I love this place and it's amazing how it is"
Monick Sanchez	Los Angeles, CA	2019-06-28	"We go every summer and camp out at the Dunes it's what my family looks forward to every year"
tonya baird	lompoc, CA	2019-06-28	"I signed this petition because family enjoy the dunes and there's no good reason to close it"
Stacy Fogelson	El Cajon, CA	2019-06-28	"We love to ride and love to go camping!"
Thomas Parachou	Minden, NV	2019-06-28	"I'm an active OHV enthusiast and love the piano dunes so many great memories growing up and I want to share it with my children"
Adam Stevens	Mariposa, US	2019-06-28	"My children love our annual vacation to the dunes, just as much as i loved it when i was their age. Our family has been making memories there for decades. We teach our kids responsible use of the beach. We pack out more than we pack in, on all of our outings. This carries over into our use of the National Forest, and lakes, near our home. We plan to continue our visits to the dunes, for years to come. Keep them open."

Name	Location	Date	Comment
Shawn Pahl	Phoenix, AZ	2019-06-28	"I want to protect my right to off road"
Sarah Hove	Spanaway, WA	2019-06-28	"when I visit home this is one of my favorite places to go and have fun with my family."
Robert Sargsyan	Santa Clara, CA	2019-06-28	"This is somewhere that memories are created and a part of many peoples lives"
Christine Rivera	US	2019-06-28	"Christinerivera"
Brian Dady	Sunnyvale, CA	2019-06-28	"Gotta keep Oceano Dunes open to all."
Dan Bly	Visalia, US	2019-06-28	"This beach and dunes are a family tradition that shouldn't be taken away."
Jared Tinker	Porterville, CA	2019-06-28	"I ride out there"
Ted Childers	Overbrook, OK	2019-06-28	"This is crapWTH California"
Thomas Talan	Los Angeles, CA	2019-06-28	"I've spent most of my life enjoying the dunes. Riding motorcycles, 4x4's and camping with the family. I want my daughter to enjoy the same. This community of enthusiast is dedicated to preserving our wild spaces, responsibly managing them. So everyone can enjoy them in the future."
Nate Delaney	Minden, NV	2019-06-28	"Enviro-Nazis pushing their land-closing agenda through skewed data and biased reporting. Keep our American lands open FOR ALL to enjoy!"
Lysa Musial	Agua Dulce, CA	2019-06-28	"We need more open space to ride, not less."
Mark Neally	Albuquerque, NM	2019-06-28	"Mark Neally"
Bryan Davis	Visalia, CA	2019-06-28	"I love the dunes and hate the tree huggers trying to close them"
Andriea Torres	Stockton, US	2019-06-28	"I enjoy going to the dunes!"
Joe Tralongo	SanJose, CA	2019-06-28	"My father and I spend quality family time together here."
Kellie BOGNUDA	Nipomo, CA	2019-06-28	"Kellie Brown"
Chris McPartlin	US	2019-06-28	"This is a family. All of us go here to meet with our second families"
Terry Sanchez	North Las Vegas, NV	2019-06-28	"We need to save what we have left"
Judy Gambill	Stirling City, CA	2019-06-28	"Because we have been going for years. Please don't keep closing down all our riding places�"
Russ Hargreaves	Fort Collins, CO	2019-06-28	"If it's open, it should remain open."
Teresa Cline	US	2019-06-28	"I have been going here since I was a toddler. Love this place and want it to remain open. The town needs the revenue as well. So many reasons to keep open."

Name	Location	Date	Comment
Isaac Schick	Walnut Creek, CA	2019-06-28	"I did it for America."
sergio leon	Avenal, CA	2019-06-28	"Sergio Leon"
Marissa Wolf	Thousand Oaks, CA	2019-06-28	"Marissa Wolf"
Angelica Escandon	Clovis, CA	2019-06-28	"Océano Dunes Camping Is A Wonderful Tradition For My Family One That Is Very Dear To Us ����"
Gina Costa	Tracy, CA	2019-06-28	"We love this place"
Mike Johnston	Warren, OR	2019-06-28	"Helping out a good friend and also love riding and camping myself"
Travis Southard	Palm Desert, CA	2019-06-28	"It has been a fun dirt bike riding spot for myself and children for many many years! Camping riding and family fun!"
Gina Carabajal	Madera, CA	2019-06-28	"My family and I have fond memories of the dunes riding quads and just a good time"
Jodie Cunningham	Sun City, AZ	2019-06-28	"Jodie Cunningham"
Christina Hayes	Solana Beach, CA	2019-06-28	"Stop CA Democrats from making this a over legislated crappy state! Vote Red!"
Lucy Jorge	Hilmar, US	2019-06-28	"Many wonderful memories with family and friends!"
Rosalinda Love	Marina, CA	2019-06-28	"RosalindaLove"
Anna Seidl	Port Washington, WI	2019-06-28	"Love the Dunes! alot of fun times for the whole family ."
Rosetta Carpenter	San Clemente, CA	2019-06-28	"Rosetta Carpenter"
Jeremy Eldridge	Fernley, NV	2019-06-28	"The dunes should be open to all forms of recreation."
Lonnie Thomason	Corona, CA	2019-06-28	"This would be detrimental to the Offroad community"
Greg Pace	Santa Cruz, CA	2019-06-28	" I am signing because this just has to stop!!! Our freedoms keep on getting infringed upon and it is generally an elite group who is stealing away the rights of many and they misinform people to get votes"
David W	Safford, AZ	2019-06-28	"keep land open for use"
Lyle Price	Delhi, CA	2019-06-28	"Please stop restricting our rights!"
Cody Haizlip	Santee, CA	2019-06-28	"California has limited OHV areas as it is. Very little options for OHV on our beaches. It is a small area relative to the entire coast line. There are plenty of protected beaches throughout the State. We can accept one beach for off-roaders in the entirety of the State. It's a minimal footprint for the use of he people."
Albert Ibarra	Santa Ynez, CA	2019-06-28	"I don't think it's fair"

Name	Location	Date	Comment
Garrett Isaacson	Stockton, CA	2019-06-28	"Save the Dunes!"
Kaying Xiong	US	2019-06-28	"Keep our rights"
Barbara Maletsky	Las Vegas, NV	2019-06-28	"We have been going to Pismo Beach and the dunes for the last 45 years. The dunes are still the same as they were then!! This movement to close them down is ridiculous!"
Zack Richardson	Las Vegas, NV	2019-06-28	"Pismo beach is one of the last places in America that allows recreational riding and driving near the beach. I love this place and I hope we can enjoy it for many years to come."
Jerry Flores	Ceres, US	2019-06-28	"Great family fun. Need to keep it open"
Pamela Holloway	Redding, CA	2019-06-28	"I have great memories at these dunes. Please don't take that away from future generations."
Heather Garza	Grove, OK	2019-06-28	"This place helps friends and families make great memories!!! Please don't take away another place for kids to play outside."
Jacob Schelebo	North Las Vegas, NV	2019-06-28	"Because fuck you for trying to restrict them. Keep the land free and open."
Aaron Rodriguez	Winters, US	2019-06-28	"The countless memories that have been made and that are yet to come."
Haylee Goman	Modesto, CA	2019-06-28	"This is my home away from home##"
Jeanelle Rankin	Santa Ana, CA	2019-06-28	"We need to monitor the people and. Ot close recreational areas."
Toni La Fazia	Valley Springs, US	2019-06-28	"Why not!?"
martha robichaux	Jacksons' Gap, AL	2019-06-28	"Want more area to ride. Smaller area means more accidents"
JacKie keys	Lomita, CA	2019-06-28	"I want to keep this open for our family time"
Raelene Huefner	California	2019-06-28	"I use this beach. Love to be able to drive on the beach. I am handicapped and this way I can get close to the water as well as ride the dunes ."
Maria Lopez	Avenal, CA	2019-06-28	"Stay open"
Caitlin Marquez	Bozeman, MT	2019-06-28	"This Park brings a lot of economy to the area. Let call a spade a spade. The o my reason people want this park shut down is so that they can have a private beach."
Janice Durham	Mentone, CA	2019-06-28	"I love this place"
Zach Gause	Riverside, CA	2019-06-28	"Why take it away"
Derrick Morrow	Round Rock, US	2019-06-28	"We have to keep the offroad community alive"
Donald Hesselein	Rancho Cordova, CA	2019-06-28	"Public land is for all public, not just the green party."

Name	Location	Date	Comment
Edward Wisner	Woodlake, CA	2019-06-28	"Its the peoples land and this stripping our rights is getting old!!"
Kelly Mattingly	San Diego, CA	2019-06-28	"Its in my bucket list and I havent made it there yet."
Robert Los	Red bluff, CA	2019-06-28	"They deserve it"
Gordon StCyr	Sacramento, CA	2019-06-28	"Keep the put OHV park open"
jeff peterson	San Francisco, CA	2019-06-28	"jeff peterson"
Kirsten Baker	Sonora, US	2019-06-28	"I like to camp and ovh"
Joshua Land	Hickman, KY	2019-06-28	"California has the best ohv areas in the country. Keep them open."
John enos	Granite Bay, US	2019-06-28	"I believe the dunes is more than dust and wind. It means togetherness, family, smiles on faces, and one man helping another. I'm a 3rd generation dunner and my children absolutly love it, i want my grand children to enjoy riding and playing on the dunes. Please keep my favorite offroading park open!"
Loretta Sudweeks	Oakley, US	2019-06-28	"This will impact the economy of the City of Pismo Beach in a significant way with the loss of revenue from the thousands of businesses that thrive from the visitors to this area. This will have a horrible impact on the families that have come to Pismo for years for recreation and family vacation time. There just is nowhere else for them to go in California. Finally, there is no environmental impact on these dunes that Mother Nature herself cannot do 10 fold."
Michele Himes	Rancho Cucamonga, CA	2019-06-28	"Recreation sports for off roading are limited and we need to have these places for familes to continue to be able to continue to visit and vacation to."
Keira Blais	Chino, CA	2019-06-28	"I'm signing this, because I want to preserve the small amount of riding land left."
Kyle Melville	US	2019-06-28	"Off-roaders do not have enough places to ride in California, let alone places as great as Pismo."
Jon Lowery	Sherman, TX	2019-06-28	"I can"
Russell Loshbaugh	Palm Springs, CA	2019-06-28	"I worked on those beaches there in oceano and I have seen a lot but you take that beach from peoe and remove the beach riding you might as well shut it down and have no one ride on the beach. IM SIGNING CUZ IT IS A RECREATIONAL PLACE AND FUN FOR THE PEOPLE THAT LIVE UP THERE LEAVE THEM ALONE AND LET THEM HAVE FUN"
Justin Pauling	Peoria, AZ	2019-06-28	"Keep it open"
Peg Shaw	San Jose, CA	2019-06-28	"Lrts keep ATVriding open at Oceano Dunes."
Rod Harrington	San Francisco, CA	2019-06-28	"Roderick B Harrington"

Name	Location	Date	Comment
Tim Jones	Ontario, CA	2019-06-28	"I enjoy open spaces and off roading."
Christina Calhoun	Elk Grove, CA	2019-06-28	"My family has traveled specifically to ride the dunes! You will kill the economy in that area if this is closed down!"
Nicholas Cook	Henderson, US	2019-06-28	"I have memories here. Not as many as others but this one of the few places in CA you can still camp on the beach and drive on it. Camping is amazing here. This should alway be available for future generations"
Danielle barcelos	San Jose, CA	2019-06-28	"I like having parks to ride, if you close them, I will be sad."
James Clesceri	US	2019-06-28	"I enjoyed riding the dunes over here. They need to reopen some of the area and keep the beach how it is now."
Maggie Munoz	Kerman, CA	2019-06-28	"Maria Munoz"
Cam Britt	Clear Lake, IA	2019-06-28	"Dont let commiefornia take what isnt theirs"
Crystal Bailey	Clovis, CA	2019-06-28	"I love the dunes! And so does my family!"
Robert Inglis	Santa Paula, CA	2019-06-28	"This area should remain open to off road vehicles, camping and like activities. California is quickly eliminating areas to go and this should not be closed."
Marea DeNicola	Mission Viejo, CA	2019-06-28	"We love to ride and would hate to see our family tradition lost!"
seena flores	carl junction, MO	2019-06-28	"Because it's where I grew up and it should be open for generation to go"
Ryan Stolp	Mill Valley, CA	2019-06-28	"I went to school in San Luis Obispo, spent a few years in the area and shared many memories with friends on weekends out at the dunes. This is a place where people can have fun, make friends and feel free to relax. Though it's been a couple years since I've been, the Pismo Dunes is a destination and topic of conversation that I encounter with people of all ages all around the state to this day. This park must stay open to maintain the great culture that has developed from it's presence to the park in the San Luis Obispo county."
Patricia Persky	Sunland, CA	2019-06-28	"Patricia PerskyPlease keep it open for the public to enjoy.I don't understand why everything has to be taking away."
cody king	Tustin, CA	2019-06-28	"I support the dunes"
Nancy Carlson	Santa Monica, CA	2019-06-28	"Please do not close this#"
Mckenzie Prins	Holland, MI	2019-06-28	"I'm an off-roader myself, I see no reason sand dunes can't be enjoyed by all."
Austin Woods	Glendale, US	2019-06-28	"I grew up in the dunes. My kids should enjoy then just as much as I did."
Beulah Uber	Keenesburg, CO	2019-06-28	"Heck yes. Keep them open."

Name	Location	Date	Comment
roger williams	Roseville, CA	2019-06-28	"Cause I love camping with my off highway vehicles!!"
Mary White	Stockton, CA	2019-06-28	"I would love the chance to experience the dunes, I've heard about them all my life. I hate to think of them closing before I had the chance!"
Aiden Her	US	2019-06-28	"this place has a special piece in my heart"
Scott Hoff II	Copperopolis, CA	2019-06-28	"I love being able to ride oceano dunes"
John ferguson	Perris, CA	2019-06-28	"Trump train"
jackie Willen	valencia, CA	2019-06-28	"This is ridiculous !!"
Ashleigh Johnston-Barton	Santa Barbara, CA	2019-06-28	"I support Jeremy"
Alyssa Lee	La Habra, US	2019-06-28	"Grew up here, raised my babies here, this is not just where everyone vacations. It is home to so many of us. So many memories. I will do whatever I can to make sure it stays open for many years to come!!! #OceanoDunesMatters"
Dean Heller	Simi Valley, CA	2019-06-28	"I'm an avid off roader"
Vincent Machado	Manteca, CA	2019-06-28	"Camping and riding here has been a family tradition ever since I was born. Don't take this away from me and the future trips with my own kids when that happens."
Dana DaLuz	San Diego, CA	2019-06-28	"We need to keep open spaces in CA!"
Benjamin Goerzen	US	2019-06-28	"I use to camp on this beach, and would like to have my children experience the same thing i did. This is the peoples beach and dunes. We so sir you may not take our beach from us because tree huggers cant stand us beach campers. How Dare You!!!!!!"
David Taylor	clovis, CA	2019-06-28	"Because I'm tired of big government doing whatever they want.  I think it needs to go to the voters, not some politicians who think they know what's best."
Mariajean Garcia	Oakland, CA	2019-06-28	"I LOVE PISMO."
Jesse Beebe	Nipsey husslevile, CA	2019-06-28	"Jesse beebe"
Audra Smith	Big Bear, CA	2019-06-28	"I grew up riding there and my kids grew up riding there! It's one of the last few great places CA hasn't screwed us out of or "sold us out" on until now!"
Jimmy Caldwell	Fresno, CA	2019-06-28	"I want too"
Judy Dorsey	Medford, OR	2019-06-28	"Judy Dorsey"

Name	Location	Date	Comment
Jesse Abernathy	Shafter, US	2019-06-28	"I'm signing because I've been coming here as a young boy and it's been the best 15 years and I want it to be open for ever and ever till the day I die"
Amanda Young	Camarillo, CA	2019-06-28	"To enjoy outdoor life, get away from TV, cell phones, video games."
Cheri Thomas	Garden Grove, CA	2019-06-28	"Cheri Thomas"
Carlos Rosales	Bakersfield, US	2019-06-28	"��"
Mark DeVries	Bakersfield, US	2019-06-28	"I want to keep these dunes open to OHV riding"
James Drew	Vancouver, WA	2019-06-28	"Friends use the area and would like to keep it accessible"
Michelle Elderkin	Westminster, CA	2019-06-28	"I grew up enjoying these dunes, we need to save them"
Paul Howard	Visalia, CA	2019-06-28	"Great place for camping, ocean fishing, and off roading. This place also brings a lot of business And tax dollars to the local economy. Hotels, restaurants, and stores will all be affected by losses in revenue. My kids love this place. Keep it going."
Joshua Young	Fresno, US	2019-06-28	"I want my dunes to be able to be shared to anyone and everyone."
Mark Briton-Jones	Westlake Village., CA	2019-06-28	"Hands off OUR parks!"
kenneth Brockman	Katy, TX	2019-06-28	"This land belongs to the tax payers not the government, we work hard to enjoy a weekend on the beach"
Jake Johnners	Santa Paula, CA	2019-06-28	"Cause I can"
William Llado	Moreno Valley, CA	2019-06-28	"Brittany"
nicole thomas	Los Angeles, CA	2019-06-28	"I'm signing because that's where people love to ride and it's a great sport for family and friends and children to have fun"
Sue Monkhouse	Modesto, CA	2019-06-28	"This is the peoples land, and must still be maintained as such"
Kristina Johnson	Madera, US	2019-06-28	"Because I think its what's right."
Cody Fransen	Selma, CA	2019-06-28	"I like camping and riding on the beach."
Ron Daniel	Hemet, US	2019-06-28	"Come on everyone, we have got to sign this to keep this place open."
Candi Taiese	Moreno Valley, CA	2019-06-28	"Because he's hot ####�"
Nicole Coccimiglio	Oakley, CA	2019-06-28	"Smh"
Jerry Russell	Fremont, CA	2019-06-28	"Wonderful place for camping and playing."
Mark Barber	La Grande, OR	2019-06-28	"We visited there last summer and rented an RZR for a few hours. Had a great time. Keep the dunes OPEN!"

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Nicole Coccimiglio	Oakley, CA	2019-06-28	"Great place to make family memories"
Denis Richardson	Dinuba, US	2019-06-28	"Nothing compares the the riding and camping experience on the beach with family and friends"
Heather Rogaczewski	Wellington, NV	2019-06-28	"Pismo beach holds fond family bonding experiences for me dating back to 1970. OHV use was an important part of this bonding experience. I have been married for 22 years and we have raised 2 successful children (now adults) through these experiences. Please do not deny future generations the opportunity to form these relationships. Allow OHV access!"
Sandra Hardy	US	2019-06-28	"I ride"
sheila krenzer	palo alto, CA	2019-06-28	"It's a super fun place I have a lot of memories here and now have a son I want to be able to experience this amazing place!"
Sheila Griego	Westminster, CA	2019-06-28	"Don't let another great feature at our beaches close, growing up camping, riding and clam digging at Pismo is a memory I'll always treasure keep the Dunes and the beaches open for our kids to make their growing memories as happy as we made ours."
Gigi Salazar	Paso Robles, CA	2019-06-28	"I grew up in playing & riding quads in those dunes. I would be disappointed if they were taking away from families."
Bailey Borluca	Hesperia, CA	2019-06-28	"Never been, only do glamis! But I would like to go someday"
Justin Minnix	Tracy, CA	2019-06-28	"I ride and camp here and it is a great place to take a vacation. we deserve to kee this svra open"
Paula Allison	US	2019-06-28	"I want the dunes to be open!!"
Kody Krikorian	US	2019-06-28	"Want to help a buddy"
Mike Lazok	Buena Park, US	2019-06-28	"I haven't been for a while but my children deserve to go and experience beach camping and dune riding at the same time!"
Russ Barnard	Redding, CA	2019-06-28	"Murica"
Norma Fajardo	Oakland, CA	2019-06-28	"I love being able to enjoy the beach with my family."
Dylan Brechtel	El Macero, CA	2019-06-28	"I mean, c'mon"
Chuck Malone	Bakersfield, CA	2019-06-28	"The dunes are so much fun"
Tony Carrancho	Richmond, US	2019-06-28	"Take take away all that is good family fun. Maybe things just need to be tweaked . There is no need to shut down work together and make it work thank you"
Joshua Lee	corona, CA	2019-06-28	"Please keep our OHV parks are open"
Dean Atkin	Corning, CA	2019-06-28	" My name is dean and I am a avid supporter of keeping the dunes open. I have 4 ohv vehicles that I pay \$55 dollars every other year to take care of areas that I can take my vehicles to. If you close pismo beach that only leave somoa dunes to ride at the ocean. 99 percent

Name	Location	Date	Comment
			of ohv users are well rounded citizens that respect the environment and keep clean. I support groups and go out to clean and repair ohv trails in California. Sales of ohv vehicles has skyrocketed with the increase of performance side by sides(which meet strict California emissions standards) and every couple months we hear how the government is slowly shrinking were we can ride. With the increase of sales of ohv vehicles were do you expect people to ride them. Not only are you receiving money for ohv parks by us paying for ohv tags. But much more money is received by sales tax of purchasing the vehicles and all the aftermarket parts. I'm sure it's in the 100 millions of revenue the state receives. Money needs to be spent expanding and ke"
Kimberly Porter	Vancouver, WA	2019-06-28	"Maybe the politicians in California should leave recreational areas alone and focus on fiscal responsibility!"
Kelley Chang	Windsor Mill, MD	2019-06-28	"Because Cali gov sucks Always doing something stupid like this Thank God I don't live in Cali, God forbid if I run over a lizard or mouse on accident and the Cali government will cry bloody murder On accident"
Veronica Eaves	Pittsburg, CA	2019-06-28	"We have been going to pismo for years. We have so many memories with friends and family. You have the beautiful and the dunes. There is no other place like this. Please save pismo not just for the riding and camping but the businesses that are in town that will go under."
Todd Sepulveda	Rancho Santa Margarita, CA	2019-06-28	"Great place to have family gatherings"
Melanie Nagel	Watsonville, CA	2019-06-28	"I love to go riding there"
Mike Frugaletti	Mountain View, CA	2019-06-28	"I support!!!"
Fabiola Rivera	Fremont, US	2019-06-28	"It's a place where family and friends come together to have fun and make memories."
Cynthia Cervantes	Guadalupe, CA	2019-06-28	"I love campingthere it brings me back from stress in life"
Michael Scroggins	Madera, CA	2019-06-28	"I have been to Pismo with family many times and have had fun every single time. It is a good place to camp and ride."
Toney Hunsaker	Fresno, CA	2019-06-28	"My right!!"
Rea Cupp	Lompoc, CA	2019-06-28	"Its home to our FAMILY"
Kim Lenahan	Klamath Falls, OR	2019-06-28	"I enjoy riding dunes myself"
Chris Wells	Oxnard, CA	2019-06-28	"Save the dunes ! Merica"
Gina Claxton	Modesto, CA	2019-06-28	"We need to keep these recreational areas for families to share and make memories!"
Matt Bitker	Paradise, US	2019-06-28	"I love to quad and I clean up more than when I showed up"

Name	Location	Date	Comment
Christa Ready	Reedley, CA	2019-06-28	"We utilize this space and know many others who do as well"
Jose Galvan	Stockton, CA	2019-06-28	"This is not fair it's a place where people have fun with family"
Courtney Pascoe	Victorville, CA	2019-06-28	"I live in the immediate area. Grover beach. As an avid off roader of our California deserts/dunes and watching them be shut down over the years for the most miserable excuses. I will stand by my belief in knowing wind is the most contributing factor and does so much more damage to this priceless area of the coast or any oh area over any off-roader creating the displacement of Sandro dirt. Think about it. If there is no wind then the dust/sand exposed will not travel outside of that area unless there is wind. Mother Nature people. No wind means it will fall with in where it's created. I have seen the wind at Dumont dunes or Glamis take over and create complete chaos with sand storms. All of us ohv'ers take cover and wait it out. It is not any of our vehicles out there moving about these areas that creates worst or even close to the same conditions. It's the wind. Get ahold of your real issues. We will not be shut down over your agendas!!!!! If I can be at the council meeting taking place i"
Patty Rodriguez	Napa, US	2019-06-28	"I love camping at Pismo with family, my kids love it."
Steve Friebe	Clovis, CA	2019-06-28	"The local economy must have the dollars from all the riders, the riders need a place. Its tradition."
Aaron Zimmer	Johnstown, CO	2019-06-28	"Let families go have a good time and make memories with their OHVs."
Tiffani Roshan	Los Angeles, CA	2019-06-28	"Keep it open. End of story."
Brian Combs	Portland, OR	2019-06-28	"It's important to take a stand!"
Debra Plagman	Bakersfield, CA	2019-06-28	"Stop taking away our fun!! There are no specifics as to why they want to close the Dunes except for environmental. Endangered species, well, what endangered species?"
Steve Downs	Banning, CA	2019-06-28	"I ride in that area."
Kelly Cecil	Bakersfield, US	2019-06-28	"Kelly Cecil"
Sharon Dillard	Vancouver, WA	2019-06-28	"My family are dunes riders"
Wendi Yee	Roseville, CA	2019-06-28	"The beach belongs to the public, for their use."
Colin Hurley	Arroyo Grande, CA	2019-06-28	"This is a family place"
Amy Contreras	Morgan Hill, CA	2019-06-28	"Amen! Keep them open!!!"
Justin eliot	Ventura, CA	2019-06-28	"I grew up dirt biking, enjoying the beach, and getting getting my truck stuck here. These are memories that I want to make more of"
Edmond Ahrens	Hayward, US	2019-06-28	"I use to wen my dad have a dirt bike"
Ron Jorge	El Dorado Hills, CA	2019-06-28	"I want it to remain the way it has always been"

Name	Location	Date	Comment
Todd Fields	Yorba Linda, CA	2019-06-28	"I'm signing because we need our public lands!"
Suzann Rainone	Lancaster, CA	2019-06-28	"It never should change"
Jeff Ragsdale	Campo, CA	2019-06-28	"It's our ohv area and it should stay open!"
Robert Houston	San Luis Obispo, US	2019-06-28	"I've worked on the speech for over 21 years and it would be a shame to close it down! More than 250 million dollars lost in SLO county, more than 2.2 million visitors a year Thousands of jobs lost 900 hundred miles of Califoria coast line and we use less than 1% Sign it, and tell any and everyone you know to sign"
Cheryl Proctor	Santa Cruz, CA	2019-06-28	"I support the California State Parks and everyone has the right to enjoy natural areas."
Robert Houston	San Luis Obispo, US	2019-06-28	"Beach"
Stephani Mathis	Elgin, OR	2019-06-28	"I love riding the sand dunes and its hobbies that keep kids, teenagers and adults out of trouble and out of the justice system"
Jason Walton	Laporte, CO	2019-06-28	"I believe it is a wonderful place for fun with family and friends, also alot of old and hopefully new memories to come. Please keep our land ours!!"
Bridget Brooks	Stockton, CA	2019-06-28	"This is a great place for making memories with your family and friends!"
Kelli West	Bakersfield, CA	2019-06-28	"There should be places families can go and enjoy themselves on the beach without the government interfering. I'm all for fines for people that cause trouble or litter, but banning decent people from enjoying the dunes so that eventually a bunch of developers can buy it and build more houses/condos on it (which is what we all know it will end up being about in a couple years) is complete crap"
Glendi Aguirre	Orosi, CA	2019-06-28	"Glendi aguirre"
Darnell Jackson	Chino, CA	2019-06-28	"I think it's important to keep this place open."
Samuel Venegas	Willows, CA	2019-06-28	"I love the dunes, it's historic"
MICHAEL SILVA	Tulare, CA	2019-06-28	"That's where we meet up with are family"
Candice Boten	Sunnyvale, CA	2019-06-28	"The Oceano Dunes have been a part of our family for a long time. I took my babies there. It's a place for friends and family to get together and have fun. Don't take that away! Please!"
Kenny Hosier	Las Vegas, NV	2019-06-28	"Kenny hosier"
Roger Sharp	Bakersfield, CA	2019-06-28	"Keep the dunes open"
Kimberly Caufield	US	2019-06-28	"I'm signing because myself my husband at the time my children experienced so much joy at Pismo Beach as my kids were growing

Name	Location	Date	Comment
			up I can't believe that they're taking this away I can't think of any good reason why I wouldn't sign this petition"
Janet Galleisky	Oceanside, CA	2019-06-28	"We have been going there since we were kids. Our grandchildren should be able to camp and ride as we did. There's nothing like camping."
Claudia Guzman	White Plains, NY	2019-06-28	"I love it there"
Gary Parker	Encinitas, CA	2019-06-28	"Gary parker"
LETICIA BOWLES	FRESNO, CA	2019-06-28	"It's a place of family traditions and if this ends it will devastate many lives! We will not visit Pismo anymore we will go to other places to start other traditions."
Michael McAvoy	San Luis Obispo, US	2019-06-28	"One of my favorite places to go off-roading"
James Allison	Lemoore, CA	2019-06-28	"Its a place for family's can go."
Mikayla Robledo	Salinas, US	2019-06-28	"Have the best time when we come here , making new memories and new traditions with our family."
Josiah Cameron	Stevenson, WA	2019-06-28	"I love the dunes"
Michele Sheehan	Fallbrook, CA	2019-06-28	"I love and respect the offloading community, I grew up in that family and I know how much they love and appreciate these lands. I'm a tree hugger, and so are most of them."
Kaera Rogalla	Milwaukee, WI	2019-06-28	"I grew up going to the desert and we were forced to move when the one we went to was closed to the public forcing people to cram into other areas creating more crowds."
Bonnie Nolan	Angels Camp, CA	2019-06-28	"They should be enjoyed!!!"
Marc Moran	Los Gatos, CA	2019-06-28	"I love the dunes!"
jacqueline rojas	Woodlake, CA	2019-06-28	"Family recreation place"
Jaysen Estradas	Oxnard, CA	2019-06-28	"My family loves the dunes"
Al Belisario	Santa Clarita, CA	2019-06-28	"This is a draconian response to the problem."
Andrew Spyker	Raleigh, NC	2019-06-28	"I have gone here with my family and other families contributing to the local economy multiple time per year. Without the OHV I will not travel to Pismo. I will find other areas to visit and enjoy for generations to come."
Debra Bedford-Luyk	Placerville, CA	2019-06-28	"Our family have enjoyed Oceano dunes many times over the years. It would be a shame to have this wonderful recreation area closed."
Leopoldo Ramirez	Mexico, Mexico	2019-06-28	"I support to stay open!"
Ryan Cary	Sun City, CA	2019-06-28	"Everyone needs something fun to do, keep it open so people have somewhere fun to go and take their kids and have family days out."

Name	Location	Date	Comment
Elizabeth Ramirez	Ontario, CA	2019-06-28	"("Pismo ") Oceano Dunes is such a special, unique place. Please keep it open for camping and riding use"
Kendyl Graham	US	2019-06-28	"I am signing this because Oceano Dunes needs to stay open for camping and riding!"
Luis Santana	Bakersfield, CA	2019-06-28	"Land of the free? Well can't be to free when there's boundaries and limitations on the land we get to travel and limit what we can do."
Shawn Baltzley	Oakley, CA	2019-06-28	"Me and my family enjoy cruising the dunes"
William Giorgi	US	2019-06-28	"We used to be able to ride as far down the beach as you can see and all the way to the pier. Our recreation area has been squeezed down more and more. When I walk on the areas we are blocked from, I don't see any difference from eliminating families railtrack from these areas. These are all areas of moving sand, so driving on them makes no difference. Please open up some closed off areas instead. You are supposed to protect our rights to recreate along our beaches, not restricted it. Thank you for your consideration."
Annette Quiroz	Los Banos, CA	2019-06-28	"Me and my family go there for great memories. Spending quality time together!!! Please don't close the dunes!!!"
Margaret Ross	Salinas, CA	2019-06-28	"My friend loves this place."
Kenneth Jackson	Yucaipa, CA	2019-06-28	"The state and federal government seem to have an insatiable appetite for seizing open public land. I am in favor of keeping what areas are left available open to public use and not controlled by special interests."
Wendy macleod	Hewitt, TX	2019-06-28	"I have visited there many times n spent weekends camping n riding"
Michael Thompson	Ceres, CA	2019-06-28	"We need a place to be a able to have fun with friends along side nature and fulfilling the need for adrenaline"
George Paquette	Bakersfield, CA	2019-06-28	"Fuck the libtards that wanna shut it down"
Elías Chavez	Grover Beach, US	2019-06-28	"We need a place to be a able to have fun with friends"
eli madero	hacienda heights, CA	2019-06-28	"I grew up riding on this beach. From the pier all the way down to Devils Slide. Don't let a bunch of bureaucrats ruin a great off-road area with false surveys. Help save Pismo Beach SVRA"
Sandra Vidales	Fresno, CA	2019-06-28	"Ive only been there once but had a great time and would love to continue going."
Maria Vallejo	Hollister, CA	2019-06-28	"Marielena Vallejo"
Lisa Pack	Riverside, CA	2019-06-28	"I would hate to see this happen"
Kenny Weeks	Yucca Valley, US	2019-06-28	"ThisThere is nothing else like pismo it has been many of families tradition to use that land for riding memory's"

Name	Location	Date	Comment
Michael Pepe	Las Vegas, US	2019-06-28	"I love off roading"
Shawna Mercier	Lake Isabella, CA	2019-06-28	"My family comes here all the time to ride and play on the beach camping it's a great place for the whole family"
Aaron Chandler	Riverside, CA	2019-06-28	"long live PISMO!!!!! There's so many more generations that need to enjoy off-roading on the beach's of California."
Mykayla Dick	Oakhurst, CA	2019-06-28	"This is a traditional we do all the time please dont take this away from us."
Heather Newby	Arizona	2019-06-28	"Its family fun"
jan melgarejo	Austin, TX	2019-06-28	"I am supporting John Melgarejo!"
eduardo tello	East Palo Alto, CA	2019-06-28	"Eduardo cesena"
Trevor Henson	San Francisco, CA	2019-06-28	"The dunes is part of my life and my families I would like to be able to include this part of my life, with my kids' life's. I always clean up my trash/waste don't let tourists bad and negligent behaviors ruin it for me and my family."
Brad Sherwood	Hesperia, CA	2019-06-28	"Because I want to support this"
Melissa Watson	Camptonville, CA	2019-06-28	"I support my daughter"
Christopher Acosta	Ontario, CA	2019-06-28	"Oceano is a beautiful place that's right in our backyard, no other beach like it! Preserve this place for future Generations and keep it open! If you want to alleviate congestion open more land, don't take it away! Reopen the parts of Oceano that have been taken away from the OHV."
Matthew Jukka	Chatsworth, CA	2019-06-28	"One of my favorite places to ride"
Amy DeLaney	Minden, NV	2019-06-28	"OHV access is important to families and businesses."
Maryjo Lawson	Los Angeles, CA	2019-06-28	"The dunes are super fun!! It should not be closed!!! It allows families and friends to make great memories!!!"
Brett Casey	Salida, CA	2019-06-28	"I love pismo beach! It's my happy place when i get away"
Brandon Williams	US	2019-06-28	"I've grown up camping a riding on that beach and can't wait for my kids to enjoy it like I did"
Keith Ringgenberg	Fresno, CA	2019-06-28	"It's time to stand up and fight!Environmentalists have been trying to shut the dunes down since 1970. They have used every excuse in the world. This place is wonderful, yes there are issues. Anytime people gather there can be issues, so what? There is no better place at a reasonable price to vacation in California. The millionaires pushing this want a private beach. And it's wrong and will kill the 5 Cities economy too!"
Kyle Schneider	Phoenix, AZ	2019-06-28	"No reason not to sign this"

Name	Location	Date	Comment
Tyler Jones	Clovis, CA	2019-06-28	"I love going there with the Family. Its great"
james stoddard	SAN JOSE, CA	2019-06-28	"Liberals are ridiculous you can't stop everybody from having fun all the time. haters."
John Foottit	Benicia, CA	2019-06-28	"OHV recreation is important for people, and the communities that it supports with recreational spending. Millions of dollars are spent every year in the surrounding communities."
Sarah Meyer	Joshua Tree, CA	2019-06-28	"We love going there!"
Teenamarie Macias	Hanford, CA	2019-06-28	"This is where we go to escape reality"
Terrence Moncure	Long Beach, CA	2019-06-28	"Public lands should be accessible to all, including those of us who pursue liberty and happiness through motorized recreation."
Deidre Curtis	Lake elsinore, CA	2019-06-28	"I care !"
Cynthia Gabaldon	La Verne, CA	2019-06-28	"I have been riding there for 50 years."
Thomas Motto	Auburn, CA	2019-06-28	"I want to keep it open"
Daynette McDaniel	Clovis, CA	2019-06-28	"I Love Camping in the Dunes with my family!!"
Chris Ness	Federal Way, WA	2019-06-28	"Chris ness"
erik just	San Jose, CA	2019-06-28	"I want to take my kids to the dunes. Keep them open"
Scott Scurlock	Palmdale, US	2019-06-28	"I support the preservation of OHV areas in the state of California."
Dela Russell	Elk Grove, CA	2019-06-28	"I have visited the dunes since I was a child I don't want my children/grandchildren to me as out on this experience!"
Jimmy Kelley	Lawndale, US	2019-06-28	"Leave we'll enough alone CA has too many restrictions already!"
Melinda Houston	Taft, CA	2019-06-28	"The state and government have taken everything that is fun away from people. It should be the people's choice to go and have fun on the dunes, who are they to take that right away! We the people need to stand up for our rights and kick some ass!"
Dean Bennett	Livingston, TX	2019-06-28	"I am signing because I am a member of the S.D. Off Road Coalition. Save our off road rights."
Leland Meyer	Jackson, CA	2019-06-28	"To keep this area open"
Robert Todd	Highland, CA	2019-06-28	"I don't agree with a closure."
Laura Barrera	Modesto, US	2019-06-28	"Been taking the family since they were young pre-teens now they're coming with lots of friends and family RVing and tents we always leave it how we found it. Clean for the next Beach campers to enjoy."
Fausto Becerra	US	2019-06-28	"I enjoy this place."

Name	Location	Date	Comment
Noah Stone	Nipomo, US	2019-06-28	"Hope they can see the damaging effects it could have on our local economy."
Katia D	Lake Forest, CA	2019-06-28	"It has always been a fun place to go. We just have to take care of her."
larry Hewett	Pollock Pines, CA	2019-06-28	"I lived in morrow bay for years we need that release that shreding gives us. It should be enjoyed by everyone"
Fabian Monje	Tulare, CA	2019-06-28	"I am signing because my family and I go every weekend and if you guys close it you guys are going to lose hella money"
Patrick Tubbs	US	2019-06-28	"The taxpayers of California deserve to use the beach!"
David Adams	Arlington, TX	2019-06-28	"The dunes has always been a great place. And camping out there is an unforgettable experience."
Charlotte Olenick	Apple Valley, CA	2019-06-28	"I want to keep it open.?"
ANTRANIK ATAMIAN	HOLLYWOOD, CA	2019-06-28	"I am"
Justin Kilman	US	2019-06-28	"It's the last beach you can take your family to and have a cruise on the beach"
Rino Hadzisehic	San Francisco, US	2019-06-28	"It was with heavy heart that I heard the news of this proposal to close the Oceano - Pismo Dunes. Please allow me to plea for myself and hundreds of thousands. The dunes, sand, beach, ocean belongs to us, the people. For so many years we have built the history, culture and tradition on, and around, the world famous Pismo Dunes. This area brings more than few hours of entertainment on the dunes, It brings life experience, memories and appreciation for life. Oceano Dunes, or Pismo Dunes, are something special, it is a gem, our gem. We implore you not to close this gem. We ask to keep the culture, memories and tradition going for more generations to come. The dunes brings profit and employment to the are as well. We live in California, losing a job is not an option. Please find it in your hearts to keep this gem alive and going forward. Please do not close the Oceano - Pismo Dunes."
Kashawna Berg	Hemet, CA	2019-06-28	"The dunes should stay open!"
Kelli Shaffer	Norco, CA	2019-06-28	"Kelli Shaffer"
Wayne Skeggs	Bakersfield, CA	2019-06-28	"I have used and will continue to"
Yolanda Padilla	Montebello, CA	2019-06-28	"Protect our lands"
Daniel Majeed	Bakersfield, CA	2019-06-28	"The dunes are public land for all to use!"
Melody Blankinship	Kerman, CA	2019-06-28	"Our favorite vacation place in the world"
Joseph Kearns	San Diego, CA	2019-06-28	"Oceano Dunes should stay open to the public for recreational use and camping."

Name	Location	Date	Comment
Travis Valtierra	Woodland Hills, CA	2019-06-28	"I love camping at pismo!"
Navneel Nand	Redwood City, CA	2019-06-28	"I camp and ride my ATV there. I believe that the only beach in Cali where you can ride actually ride freely!"
Laurel Trinkaus	Rialto, CA	2019-06-28	"I want to have a safe and fun place to ride"
Jeremy Grossman	Canoga Park, US	2019-06-28	"We camp and ride here. Would love for my kids to experience the same things I've been giving a chance to experience."
Ivan Hernandez	Paso Robles, CA	2019-06-28	"I camp with my disabled son almost every weekend here we love it here , why would you take this beautiful public land away from the public?"
Jessica Bassett	Bakersfield, CA	2019-06-28	"Oceano dunes are amazing and made to be played on If it was Nipomo I'd say no. It's been going on for so many years already. Block unsafe areas, make more rules, It can be done, but not closed."
Matthew Huntoon	Central Point, US	2019-06-28	"The dunes are a great place to go and California is already taking too much public land away"
Jani Crane	Chico, CA	2019-06-28	"Family gathering are good this is a place for familys"
Dallas Hall	Memphis, TN	2019-06-28	"While stationed in Lemoore, CA from February 2012 to August 2016, Oceano Dunes was my go to for camping and HOV. Yosemite and the Sequias were close to where I lived and a great option for a short trip! The Dunes however were perfect for a weekend getaway. Friends and I visited the Dunes almost every weekend for 2 years. The memories we created are irreplaceable. Our visits there not only created life long memories and stories to tell for generations to come, it also supported local economy! With that being said I don't think there was a single weekend where someone wasn't airlifted out or an accident due to being under the influence. This has been the norm for a hot minute. Authorities regularly patrol the Dunes and still haven't been able to control this problem. Not authorizing HOV isn't the answer to solving this problem. Creating entry control points and random sobriety points will help sort this out. As much as I hate to ruin anyone's idea of a good time, something should be implem"
Kimberlynn Reddick	Quinlan, TX	2019-06-28	"To help out some old family friends on there adventures"
Jerry Van Vort	US	2019-06-28	"The impact to the local economy does not justify the reasons to which this public beach should be restricted"
Tracy Parish	Rancho Cordova, CA	2019-06-28	"Property rights are established at the purchase of a property, any government mandated change of use should be compensated under eminent domain."
Tina King	Simi Valley, CA	2019-06-28	"I love the family time we have at Pismo !!"
Doug Clough	lathrop, CA	2019-06-28	"We need more phv areas not less!"
Suzie Harris	Bakersfield, CA	2019-06-28	"This place should be a California Historical Landmark !!!!!"

Name	Location	Date	Comment
Sareth Prak	Turlock, US	2019-06-28	"Family oriented beach yearly gathering"
Bailey Webb	Springfield, OR	2019-06-28	"I've rode my entire life."
Suzie Harris	Bakersfield, CA	2019-06-28	"My late husband introduced us to the Dunes 20 years ago. He passes away 13 years ago. I allowed my kids to design his headstone. It reads "May you continue riding those Heavenly Dunes". They were 4, 8 and 12 at the time. That should say a lot for what those Dunes mean to families!!!"
Damaris RamosWarfield	Los Angeles, CA	2019-06-28	"I want to see this petition go through and I want to support all the people on here that enjoy this hobby."
Carlos Fierro	Clovis, CA	2019-06-28	"I'm signing because I have enjoyed going there since swing a child and I have children and I want to afford them the same experience I did as a child please don't take that away from my children."
Madeline Haywood	Bakersfield, CA	2019-06-28	"I love the dunes. It's a great place for family's to go and still have fun!"
Christian Novela	Fresno, CA	2019-06-28	"Cause pismo is sick asf"
George Miller	Victorville, CA	2019-06-28	"I love riding"
Chuck Harding	Livermore, CA	2019-06-28	"Public recreation spaces NEED to remain just that - PUBLIC! We don't need government bureaucrats deciding where we can and cannot go to enjoy nature!!"
Josh Darling	Idyllwild, CA	2019-06-28	"Keep public land for the public!"
Leslie DeArman	Bakersfield, CA	2019-06-28	"I'm signing because we already have enough problems in this world, we need ways to get away from the issues and riding in the dunes is our escape. Taking that away is unjust. This land doesn't belong to government, it belongs to the human race."
Jim Dilworth	Coalinga, CA	2019-06-28	"Jimmy Dilworth"
Dan Nater	San Francisco, CA	2019-06-28	"OHV is not a crime"
Neil Brown	Simi Valley, CA	2019-06-28	"Great times"
Colton Hines	Seattle, US	2019-06-28	"I've been riding my whole life and want my son to be able to share in the experience"
Sid HEATHMAN	GRAHAM, US	2019-06-28	"I have found alot of good friends you know who you are"
Theodore Hutz	Lodi, CA	2019-06-28	"Because I have riden there. It is important to have mixed use areas. Moto and quads needs spaces as well."
James Keuangthirath	San Francisco, CA	2019-06-28	"James"
Michel Price	Mccall, ID	2019-06-28	"Michel Price"
Andrew Kendall	Australia	2019-06-28	"It should below to the people."

Name	Location	Date	Comment
Laura Lott	Ceres, CA	2019-06-28	"Stop taking away the fun things people can do."
Cody Williams	Sacramento, CA	2019-06-28	"For justice"
Robin Spears	Delhi, CA	2019-06-28	"Robin Spears"
Lisa Moore	Oceano, CA	2019-06-28	"I love the dunes, and the ocean. People come because of this, we should not lose our rights to enjoy it, plus the State Park should not lose monies either. Keep the dunes open and available to all. ;)"
Javier Zamora	Salinas, US	2019-06-28	"Fell in love with it the first time I set foot there. Why not let other Generations enjoy it too.?"
Sandra Murray	San Jose, CA	2019-06-28	"Reason for signingAngel Oakden"
Erik Denley	Santa Clara, CA	2019-06-28	"Please stop closing all the OHV areas in california. So many families have amazing memories camping and riding there. Don't ruin one of the last few gems we have."
Sandra Burchette	Discovery bay, CA	2019-06-28	"Sandra burchette"
Branden Plotner	Las Vegas, NV	2019-06-28	"Branden Plotner"
Dustin scott	White Plains, NY	2019-06-28	"It should stay open we are hurting any one"
Steven Costanzo	Peralta, NM	2019-06-28	"We need open spaces."
Jonah Goodman	San Diego, CA	2019-06-28	"Ruining CA with all these restrictions!"
Linda Dugger	Los Osos, CA	2019-06-28	"Linda Dugger"
Nai Rankin	Fresno, CA	2019-06-28	"I couldn't imagine my kids not getting to bring their kids out there and making memories around the campfire at the dunes"
Brian McQuistion	Phoenix, AZ	2019-06-28	"Please reconsider and dont take our riding spots away!!!"
Chris Tuckr	San Jose, US	2019-06-28	"C T"
pattrick lacey	Sebastopol, CA	2019-06-28	"Pattrick Lacey"
Cherie McCarthy	Fresno, CA	2019-06-28	"This park belongs to the people of the state of California, and if we do not make our voices heard now, it will be too late! It's time we band together and fight for what is a California Coast staple."
rod crawford	Bakersfield, CA	2019-06-28	"This is going to kill thousands of jobs and the loss in tax revenue will be catastrophic to the area."
Amanda Palmateer	Jackson, TN	2019-06-28	"We can protect the environment and have a place for the riders."
Mark Mccall	Valley Springs, CA	2019-06-28	"I want to see Pizmo stay open for family memories"
Laura Lee	Tampa, FL	2019-06-28	"Laura Lee"

Name	Location	Date	Comment
matthew boylan	Hanford, CA	2019-06-28	"It's our right as citizen to have places like this to ride camp and have fun . Dont take away something that people love to do . You take this away from people pismo wont survive"
doug stump	Nampa, ID	2019-06-28	"keep the trails open"
Bradley Hamner	Memphis, US	2019-06-28	"Need more like this"
Ben fowler	Kings Beach, CA	2019-06-28	"State parks should be for the people."
Paul Sznaider	Loomis, CA	2019-06-28	"We enjoy the camping , dune riding and family time together there."
Tracy Mitchell	Reedley, US	2019-06-28	"Recreational areas are important to you, your families and your friends health and well-being."
Tyler Moore	US	2019-06-28	"People need this place��"
Ken Durr	Riverside, CA	2019-06-28	"I want to keep Pismo open to OHV use."
Jennifer Miller-Sprague	Bishop, CA	2019-06-28	"Riding and camping is a great past time for families"
Tony Cortez	Hayward, CA	2019-06-28	"I grew up recreating at Pismo beach. And I would like my kids to have the opportunity to do the same"
Aaron Baker	Las Vegas, NV	2019-06-28	"Pismo is where my kids and I go for vacation every year we take our atvs and buggy out inthe dunes and cruise on the beach it's our family tradition"
Ruth Hidalgo	Lancaster, CA	2019-06-28	"The very popular Oceano Dunes SVRA is a place people go to make family memories. There are hundreds of miles of protected lands along the coast. This small one should be protected for recreation. Balance is best. It is one of the few places so cal OHV riders habe to recreate in coolertemps during the summer. I want my children to be able to bring their children to Oceano SVRA as we did them."
braden mackay	San Ramon, CA	2019-06-28	"The ability to enjoy areas like this is important."
Ryan Thomas	Tecopa Heights, CA	2019-06-28	"I have a right like anybody else to use public land. Everybody should have a chance to enjoy the beach as they would like it."
Rich Walters	Albuquerque, NM	2019-06-28	"Keep the trails open!!"
Jon Carver	Thornton, CO	2019-06-28	"Because it's so fun to ride here"
Karen Manning	Bend, OR	2019-06-28	"I love that place"
John Edgar	Las Vegas, US	2019-06-28	"We need places for kids to play"
Oscar Verdugo	Rio Rico, US	2019-06-28	"We love it there"

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Kevin Hayward	Bend, OR	2019-06-28	"Too often the liberal democrats want to take away from the people they're supposed to be representing. They represent nothing but their own opinions and pockets"
sue west	golden valley, AZ	2019-06-28	"im with you Shirley!"
Linda Correia	Victorville, CA	2019-06-28	"It's one of the only beaches we have like this that all people can enjoy!"
Gayla Nelson	West Jordan, UT	2019-06-28	"We are losing too many of our recreation areas."
John Flores	La Mirada, CA	2019-06-28	"Off highway vehicle areas provide good family recreation, Oceano Dunes is a great place to play."
Noelle Burg	Santa Ynez, CA	2019-06-28	"We need our parks!"
Jeff Burgess	Desert Hot Springs, CA	2019-06-28	"Our lands should be enjoyed By off-road adventure"
Antoinette VerDoorn	Lake Elsinore, CA	2019-06-28	"I go here all the time since my childhood."
David Thom	Torrance, CA	2019-06-28	"Of the millions of acres of dunes, folks can only drive in a few and we need to keep Oceano dunes open."
Kristin Hernandez	Fresno, CA	2019-06-28	"The dunes is a great place for family entertainment!"
Dan Bouchard	Stockton, CA	2019-06-28	"These public land needs to remain public. The local economy relies on them. The public enjoys them. There is no victim."
Brandon Mcmellen	Yelm, WA	2019-06-28	"I love the dunes"
Wendy Wright	Sacramento, CA	2019-06-28	"Wendy Wright"
Cherie Moss	Joplin, MT	2019-06-28	"Leave our recreational areas alone."
Nicholas Billington	Sacramento, US	2019-06-28	"I want to keep it open"
Lisa Bramble	US	2019-06-28	"This park belongs to the People of CA and we have the right to enjoy Oceano Dunes SVRA."
Beverly Cooper	Wildomar, CA	2019-06-28	"Beverly cooper"
Aaron Chandler	Stockton, CA	2019-06-28	"They need to stay open"
Rose Larsen	Atascadero, CA	2019-06-28	"Rose Larsen"
Michelle Murray	Las Vegas, NV	2019-06-28	"The government has control of too many things; lands that are meant for the public. Keep government out of shit."
Dakota Burns	Visalia, CA	2019-06-28	"I enjoy camping on the beach and riding quads."
Samantha Romero	Gardena, CA	2019-06-28	"Keep the dunes!!!"

Name	Location	Date	Comment
Ryan Mohondro	Rancho Cordova, US	2019-06-28	"KEEP PUBLIC LANDS OPEN TO THE PUBLIC"
Gregory Dockins	Reno, NV	2019-06-28	"We are slowly loosing our recreation areas and we need to fight back or they will be gone forever!"
Nora Hoey	Greenwood, MO	2019-06-28	"As a former Californian, I agree it should stay open to the people."
Alonso Sanchez	San Francisco, US	2019-06-28	"Keep the Dunes!!!!!!"
Angie Manning	Monterey, US	2019-06-28	"I have enjoyed this space many times!!!!!"
Bernie Crites	Saint Louis, MO	2019-06-28	"Bernie Crites"
Kathleen Houde	Sacramento, CA	2019-06-28	"We deserve this campground. My family has amazing memories and more to come"
Dana Williamson	Bakersfield, CA	2019-06-28	"Keep Pismo Dunes openwe love riding and campingGREAT childhood memories and I'm enjoying my children now enjoying the dunesPLEASE ������*
Kim Conforti	Morro Bay, CA	2019-06-28	"This had been a family tradition since I was a lil girl to come spend time camping and enjoying the dunes."
Cori Talley	Helendale, CA	2019-06-28	"We love camping near the dunes and enjoy the fact that they are there."
Cara Fernandez	Saratoga, CA	2019-06-28	"This place is sacred for building family memories. Keep it alive for future generations to enjoy! Why close it? Let's let something remain in this world to enjoy. Close it up and what is the point?"
Aug Anderson	Ventura, CA	2019-06-28	"I'm sick the pos tree hugger libtard socialist leftist. Ruining everything in California."
Jessica Wynn	Visalia, CA	2019-06-28	"I'm signing because I've been to the Dunes and love them!"
Connie Spolar	St. George, UT	2019-06-28	"I am originally from California. This coastline should be available for recreation as it has been."
Nancy Caudillo	San Diego, US	2019-06-28	"Places like these make your childhood.It would be devastating to know that future generations won't have that opportunity. #savepismo"
Quentin Chadwick	Lodi, CA	2019-06-28	"I've been an off road enthusiast over 40 years."
Carlon Thompson	Sacramento, CA	2019-06-28	"I love pismo it's fun and exciting for whole family plus if you ride at your own risk I don't feel it's unsafe at all this literally one my favorite places to go I go couple times year"
Candice Wichmann	Meridian, ID	2019-06-28	"Candice Wichmann"
Tim Medina	Manteca, CA	2019-06-28	"Tim medina"
Nelson Bretao	Ripon, US	2019-06-28	"Great place for the whole family and friends to hang out."

Name	Location	Date	Comment
John Hart	Santa rosa, CA	2019-06-28	"California government sucks and riding areas need to stay open"
Leo Stiles	Tustin, CA	2019-06-28	"I want to keep the land open for recreation to off-roaders."
Kimberlee Wertens	Lake Forest, CA	2019-06-28	"We love being able to enjoy this small area of CA on the beach with friends and family."
Ralph Gutierrez	Rancho Cordova, CA	2019-06-28	"Chem trails are killing us little by little but we never complain but we are going to complain about a little dust sand Mother Earth don't think so"
Patrick Dollar	San Jacinto, CA	2019-06-28	"Public land belongs to the public, not the government"
Sheena Hawkins	Santa Paula, CA	2019-06-28	"I have great memories at the dunes during my college days. It will be a great loss of income for the city and state if it is closed down."
Garrett Scott	Crescent City, US	2019-06-28	"The park is already well regulated with existing rules and environmental considerations created by the State. There is no need for more limits and rules."
Jeffrey Balderrama	Oceanside, CA	2019-06-28	"Leave our state the way it was!!"
Justin Mueller	North Platte, NE	2019-06-28	"Keep our public lands open to the public, including OHV's!!!"
Sarah Dockins	Reno, NV	2019-06-28	"I'm signing because I believe there should be recreational areas for everyone, including OHV."
Dennis Radke	US	2019-06-28	"let's be heard people."
Tracy Hughes	Spanaway, WA	2019-06-28	"Tracy Hughes"
Brian Kemp	Apex, NC	2019-06-28	"Dirt bikes and stand up jet skis are awesome !!!"
sandra johnson	Visalia, CA	2019-06-28	"Sandra johnson6"
Patricia Kuhnel	Reedley, US	2019-06-28	"I want them open"
Linda Guidry	Bakersfield, CA	2019-06-28	"This means a lot to me best friends in the world and her family."
Rebecca Prewett	Nipomo, CA	2019-06-28	"Recreation on the dunes is an important part of our local economy and culture. Families, both local and out of the area, have built memories on those dunes, and their adventures have benefited our local economy greatly. Let's not close the dunes and lose a unique treasure that draws tourists, provides recreation for families, and sets us apart from all other coastal communities."
Paula Young	Yuma 85364, AZ	2019-06-28	"Paulette young"
Kelsi Callahan	Sparks, NV	2019-06-28	"We need to preserve open land."
Olga Lane	Lawndale, US	2019-06-28	"REASON FOR SIGNINGI'm signing because I believe there should be recreational areas for everyone, including OHV."

Name	Location	Date	Comment
Olga Lane	Lawndale, US	2019-06-28	"REASON FOR SIGNINGI'm signing because I believe there should be recreational areas for everyone, including OHV."
jennifer sherrin	Reedley, CA	2019-06-28	"It's ours. Stop stealing our family places to go."
Terrance Pedersen	Las Vegas, NV	2019-06-28	"A place for friends and families to enjoy needs to stay!"
Bobby Abbott	Lewistown, MT	2019-06-28	"I believe it should be left open to enjoy just like our past motorist have gotten to enjoy for years"
Miguel Serrano	Clovis, US	2019-06-28	"A lot of business will loose on tourist money and they will close down. I love taking my family camping there as well."
Tim Ayuso	Clovis, US	2019-06-28	"Keep the Dunes open."
Deborah King	Corona, CA	2019-06-28	"Because we all need a place to relax and let loose"
Glenn Nicholas	Merced, CA	2019-06-28	"Family Time!!"
sergio montano	Clovis, CA	2019-06-28	"My family loves camping together at the beach."
Ginger Hill	Valencia, CA	2019-06-28	"We need More off road areas, Not Less!"
Ana Ormonde	Artesia, CA	2019-06-28	"Ana ormonde"
Hetty Dutra	Smartsville, CA	2019-06-28	"I trust that Ann always chooses the right thing. She would never harm the environment, so this must be true!"
Dorian Stratakis	Madera, CA	2019-06-28	"The dunes is my second home"
Rich Cordes	Lancaster, US	2019-06-28	"Sign up"
William McMahan	Ramona, US	2019-06-28	"Quads and campers have going there for years and it's a big boost to the economy. For as long as I can remember some minority group has been trying to close down this path because they just don't like it. This has to stop, the beach needs to stay open and people need to be able to enjoy the beauty of the central coast."
Kimberly Kennedy	Rye, CO	2019-06-28	"I want to save this area!"
Kimberly Niven	Monument, CO	2019-06-28	"To keep the Democrats from ruining everything"
Theresa Diaz	N. Las Vegas, NV	2019-06-28	"I don't understand why you'd take this away! Would you rather these people on the streets doing drugs and becoming alcoholics? Please hear them out!!!!"
Russell Paul	Redlands, CA	2019-06-28	"We are slowly losing our rights on everything. This needs to stop. This place has been a camping/off-roading Mecca in California for a very long time"
Sarah Diaz	Palmdale, CA	2019-06-28	"Going to pismo is an experience like no other family and children create awesome memories of being able to ride on your quad or dirt bike along the beautiful coast because it's the only place in ca.

Name	Location	Date	Comment
			That your allowed to , and the threat of our last adventure is being taken away , please keep the pismo dunes open"
Rachel Kovach	Los Angeles, CA	2019-06-28	"The Oceano Dunes are a highlight of our community. Protect the Dunes!"
Tyler Hayes	San Diego, US	2019-06-28	"Because the land belongs to the people"
Vincent Avila	Apple Valley, CA	2019-06-28	"I have not been yet"
Rick Lee	Buellton, CA	2019-06-28	"Rick Lee"
Keith Carty	Jamul, OR	2019-06-28	"I love visiting the dunes freely"
Heather Taylor	Portland, OR	2019-06-28	"Ive gone this beautiful beach since i was little. So have many other people. I want to keep it open for my kids and others so they can have the memories that i do"
Kendon Johnston	Calgary, Canada	2019-06-28	"Road trip!"
Tammy griffis	Riverside, CA	2019-06-28	"Tammy griffis"
David Barraza	Los Angeles, US	2019-06-28	"Pretty sad California is becoming the worst place to live"
Alexandra Jensen	Clovis, CA	2019-06-28	"It's my favorite place to be so many memories"
Gregg de Haan	Alameda, CA	2019-06-28	"This closure is a class war. Certain folks think that blue collar families should not have a place for family recreation and dine access. We are the folks that build your homes, fix your cars and we too deserve a right to recreate. We are environmentalists, lovers of the planet and just like you we have respect for what we believe in. Please respect our sports, our family traditions and be realistic about dust that is natural. The dust control species of plant in the dunes now are non native and are invasive. They were brought here by developers to expand farms, not preserve open sand dunes. Gregg"
Gail Giorgi	Gaviota, US	2019-06-28	"Save our public lands! ��It's our right to exercise our freedom in this country to respectfully enjoy our natural resources."
Joseph Blume	Stanton, CA	2019-06-28	"Keep Pismo Beach open."
Scott Morey	San Francisco, CA	2019-06-28	"Best family spot"
Nicolas Beuke	Stephenville, TX	2019-06-28	"Adrenaline rushes can help Veterans and others with PTSD."
Gail Giorgi	Gaviota, US	2019-06-28	"Save our public lands! It's our right to respectfully enjoy the freedom to use OUR nation's public lands."
Marco Alves	San Jose, CA	2019-06-28	"Just another example of how individual rights are being taken. Keep Pismo Beach open to OHV!!!"
Harold Myers	Hoopa, US	2019-06-28	"This is a well supervised activity"
Hannah Wiese	Morro Bay, CA	2019-06-28	"This is part of something my family enjoys and so do many more."

Name	Location	Date	Comment
Rachel Scott	Enumclaw, WA	2019-06-28	"Dunes are a huge part of many's life's it's a way to have Fun and relax for my group of friends"
Gary jacobs	Santa Barbara, CA	2019-06-28	"If you don't like what has been the norm at the dunes for decades then you should never have moved there!"
Harold McMullen	Hanford, US	2019-06-28	"Keep the Dunes Open"
Christine Knotts	Chandler, AZ	2019-06-28	"I grew up at these dunes with great camping and great riding memories! I also enjoy bringing my kids to show them how I grew up with outdoor fun!"
Ryan Roberts	US	2019-06-28	"This is important"
Kim Pyers	Concord, CA	2019-06-28	"We must keep our options open for recreation and stay off electronic devices."
henry mckinney	Santee, CA	2019-06-28	"Freedom"
Christopher Schmidt	Lake Elsinore, CA	2019-06-28	" I've been going here my whole life and they've been closing down a lot of the area and most of it is protected . leave what's left for us to go enjoy ."
James anderson	Auberry, CA	2019-06-28	"People have hundreds of thousands of dollars invested and their equipment to be able to enjoy this place they will also destroy the little town there bars there mechanic shops the rental stations everything will be lost this is a very bad mistake"
Dan Eastham	San Luis Obispo, CA	2019-06-28	"Great fun place to go. People need this."
Andrew Figone	Yuba city, CA	2019-06-28	"It is wrong to not let people ride on this land!"
Christina Kissick	Thousand Oaks, CA	2019-06-28	"We love Pismo"
Heidi Sotelo	Coarsegold, CA	2019-06-28	"I love my son"
Grant Glasscock	Remlap, AL	2019-06-28	"Grant Glasscock"
David Breeden	San Francisco, CA	2019-06-28	"David Breeden"
Marco Cepeda	San Jose, CA	2019-06-28	"I love the Pism Dunes (OHV) park. We can't shut it down from riding! It would be the worst!"
Charles Loose	Rialto, CA	2019-06-28	"Charlie Loose"
Mitchel Mejia	San Francisco, CA	2019-06-28	"I grew up camping here"
Cecilia Birmingham	Morgan Hill, CA	2019-06-28	"I too support the opportunity"
john leal	grover beach, CA	2019-06-28	"Help save the Dunes it brings too much money to close it down to just camping"

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Tanya morse	San Juan Capistrano, CA	2019-06-28	"as it is all our duty, to keep the earth healthy, beautiful and calm"
Kevin Mantoani	Calgary, Canada	2019-06-28	"I think closure is not managing recreation."
David Trudnich	San Pedro, CA	2019-06-28	"The dunes need to stay open for families to enjoy."
Robert Williams	Madera, CA	2019-06-28	"The State has a lot of beaches this one should stay open to OHV's."
Debbie Wineman	Nipomo, CA	2019-06-28	"The beach should be enjoyed by everyone ##"
JAMES HIX	Pismo Beach, CA	2019-06-28	"If people don't like sand they shouldn't have moved to the beach"
Jamie Bodinson Sparks	US	2019-06-28	"It's important to my brother, Lee Gibson."
Stacey Hayes	San Jose, US	2019-06-28	"I am an American who believes in freedom."
Peter Schroeder	Tampa, FL	2019-06-28	"Life's a beach, keep Pismo open."
Nicholas Lesmeister	Temecula, CA	2019-06-28	"Because fuck your communism that's why."
Jason Keller	Springville, UT	2019-06-28	"I have riding and land should stay open to OHV"
Mark Piazzese	US	2019-06-28	"Mark M Piazzese"
Peter Jensen	Santa Barbara, CA	2019-06-28	"only morons who don't know how to ride or handle their alcohol have died."
Kristen Bardwell	Virginia Beach, US	2019-06-28	"I like pismo beach"
Anne Muno	Encinitas, US	2019-06-28	"It is just dunes keep some room for play!"
Sergio Parra	Kerman, US	2019-06-28	"Great place for family."
Micheal Mullings	Roseville, CA	2019-06-28	"A lot of great memories and plan to make more in the future!"
Craig Potter	Corona, CA	2019-06-28	"I have been to this area with my family many times and it is super fun. Please keep it open!!!"
Sherry Hansen	Los Angeles, CA	2019-06-28	"My family loves to vacation there"
Dennis Radke	US	2019-06-28	"they need to regulate the idiot's and require a skill testing system to weed out the amateurs who have no skills that dont belong on the big dunes. there needs to be a bunny hill area just like ski slopes ."
Sydney Dunbar	Nipomo, CA	2019-06-28	"Sydney Dunbar"
Cody Knoll	Reno, NV	2019-06-28	"I'm signing because off road vehicle recreation is a major part of only my personal life but my professional life as I work in the industry. Taking away our public lands costs people jobs.  #KeepPublicLandsOpenToThePublic"

Name	Location	Date	Comment
Stacey Lopez	Los Angeles, CA	2019-06-28	"It's important we respect our land and hear the voices of our community. If the community doesn't want the land developed then the land shouldn't be developed."
Stacey Lopez	Los Angeles, CA	2019-06-28	"It's important we respect our land and hear the voices of our community. If the community doesn't want the land developed then the land shouldn't be developed."
Dennis Radke	US	2019-06-28	"I have been going to pismo dunes for 45 years and I will not back down from this fight to save the dunes ."
Melissa Roate	Puyallup, WA	2019-06-28	"I love camping!!!!!!!!!!"
Dimitri Masouris	Los Angeles, CA	2019-06-28	"Its a free country. My land!"
Angel Tatenco	Claremont, CA	2019-06-28	"Keep Pismo Open!"
Lejla Kuhinja	san jose, CA	2019-06-28	"We have fun going there with our family!"
Kylee Lanini	Fresno, CA	2019-06-28	"Pismo is awesome. We vacationed there every year. The best memories were made in Pismo."
Ryan Neese	El Dorado Hills, US	2019-06-28	"Leave the dunes open as they are!"
Justin Toch	Barstow, CA	2019-06-28	"I love to ride at the dunes on my bike"
Sam Russell	Post falls, ID	2019-06-28	"This land is the people's government doesn't own anything!!!!!!!"
Daniel Montagna	Santa Fe Springs, CA	2019-06-28	"Im hoping my son can enjoy the dunes when he gets to the age he can ride like I have so many memories of camping, riding and good family times"
Kaylynn Bush	California	2019-06-28	"I love camping there and it amzing place to take ur family"
mauricio santana	Montrose, CA	2019-06-28	"I want my son to grow up with beautiful memories of Pismo, dunes, water, Sunday clean ups, everything we did as kids."
Daniel Gonzalez	Parlier, US	2019-06-28	"Awesome place for camping riding atvs just to have a good time with your family making great memories please don't take it away"
Nelson Shear	San Diego, CA	2019-06-28	"Preservation is progress!"
Michael McLaughlin	Lincoln, CA	2019-06-28	"I don't want to see this place close down, the last place in California that you can take the Family and drive right on the beach, it SHOULD be preserved For many Future Families from all over to come out and be able to access the beach and the Dunes."
Steven Bowen	Carlsbad, US	2019-06-28	"I grew up in SLO at the bottom of Bishops Peak. The dunes have always been open, let's keep it that way!"
Daniel Zaragoza	Coronado, CA	2019-06-28	"We need to keep lands where we can poay and enjoy open!"
Kolten Morrison	Oakhurst, CA	2019-06-28	"I am signing because, there's no reason why we should lose our rights to ride!"

Name	Location	Date	Comment
Russell Fewkes	US	2019-06-28	"It's a fun place"
Carol Kingsbury	Apple Valley, CA	2019-06-28	"Carol Kingsbury"
Douglas Wynn	Panorama City, CA	2019-06-28	"I am a long time user of this area, theis is the a very unique area that has been for the OHV users and it the only one on the west coast."
Susan Young	Marshall, VA	2019-06-28	"Parks are how we'll survive our future. Protect the land and animals. If you want to close it to people, but keep it preserved that's another ball of wax, bit don't give this to crackers and devepers. That would be a sin."
Michael Wallace	Nampa, ID	2019-06-28	"Pismo Beach is an amazing place. Riding, swimming, campfires with family."
Rob Seghieri	san jose, CA	2019-06-28	"Oceano has been a family spot to camp for many years."
joanne perow	San Clemente, CA	2019-06-28	"Joanne perow"
Pamella Clugston	Huntington Beach, US	2019-06-28	"Johnny Butler"
Dakota Pearse	El Cajon, CA	2019-06-28	"I LOVE OFF-ROADING! It's one of the last free things you can do, please do not take this away from the people!"
Gale Brouhard	93612, Djibouti	2019-06-28	"Many memories there."
Kim Correia	San Luis Obispo, CA	2019-06-28	"Families have enjoyed vacations on the dunes for decades and this shouldn't be taken away because of people who live near there and don't like the sand. They made the decision to purchase their homes knowing the dunes were there. Also, the few bad apples that have caused problems shouldn't ruin it for the majority of the people that follow the rules and don't cause any problems."
Lori Cobb	Paso Robles, CA	2019-06-28	"I have been going to the Pismo Dunes since I was a kid. It is one of the few places left where you can ride and drive on the beach. Don't let bureaucrats ruin this for family's and kids."
Colton Craghead	Provo, UT	2019-06-28	"Because we need land for all individuals to use."
sandra williams	Phoenix, AZ	2019-06-28	" It's important to have these places open. Keeping our young adults off the streets so their not doing drugs or joining gangs. There needs to be other outlets. These people that ride dirt bikes and ATV they live for this stuff. Let them live and have fun doing it."
Pat Sudweeks	Brentwood, US	2019-06-28	"We came to school at Cal Poly in 1978 and have been riding at Pismo ever since. Family memories have been made over the years and now Grandkids enjoy the same experience. Even if they shut it down the sand will still blow and of course something else will cause these activist to complain. The money spent will leave Arroyo Grande a ghost town along with Pismo itself. Government needs to give it to the people and stay out of it."
Alicia Madera	rio linda, US	2019-06-28	"One of our favorite places to go as a family."

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Aeron Ford	San Luis Obispo, CA	2019-06-28	"I grew up on this beach. I want access to it, our beach communities benefit from extra traffic to the area. But more policing would be a great thing for everyone except the idiots that break the rules."
Tim Ireland	Oakland, CA	2019-06-28	"It is the greatest place for family and friends to have fun and vacation. My family have been visiting the Dunes sense 1982. My son learned how to ride on a Tri Zinger Yamaha at the age of 4. I hope when he has children they can share the same experienceNot to mention the sun setts, just beautifulPlease dont close the facility down."
Eric Paolinelli	Fresno, CA	2019-06-28	"This is the public's right to use not the Coastal Commission or the fringe environmentalists on the coast who see this as a problem."
Logan Hart	Clovis, CA	2019-06-28	"Oceano dunes needs to stay open"
Chris Ferrari	San Francisco, CA	2019-06-28	"Freedom"
Patricia Reveles	Oxnard, CA	2019-06-28	"Great family place to make memories!"
Candice Sandoval	Bakersfield, US	2019-06-28	"Keep Oceano dunes open!"
Tamra Dasilva	Lincoln, CA	2019-06-28	"Pismo Beach is a family tradition for so many families!"
Danny Keen	Lemoore, US	2019-06-28	"It should remain open."
Jeanene Jones	Huntington Beach, CA	2019-06-28	"Jeanene Jones"
luis lopez	Bell, CA	2019-06-28	"Save it"
Dalton Miller	Puyallup, WA	2019-06-28	"I like riding dirt scooters"
charmaine tilly	Castro valley, CA	2019-06-28	"My boys love riding there"
Mike Varano	Hinesville, GA	2019-06-28	"Pismo. Woo hoo. Instead let's shut down the tree huggers."
hope ann brown	Nogales, AZ	2019-06-28	"Hope Ann brow"
Roxana Gonzalez	Fontana, CA	2019-06-28	"It's a lovely place keep it open"
Shawn Stowe	San Jose, US	2019-06-28	"This is the only spot in California where the whole family can enjoy. What can we do to help?? I guarantee the vote will not matter. They will continue to take things away in California. California continuously falling apart!"
Robyn Armstrong	Valley Center, CA	2019-06-28	"I'm signing because I believe in this."
Kristen Beeson-Green	Newbury park, CA	2019-06-28	"It is the right thing to do. RIP Blake�"
Aida Sanchez	Antioch, US	2019-06-28	"My family and I have been going to Oceano Dunes for years, it's a tradition!! Please keep it opened!!"
Melani Lema	San Mateo, CA	2019-06-28	"some of our best family times are at Pismo."

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Eric Lewis	Palm Desert, CA	2019-06-28	"Keep it open"
Harley Hill	Eloy, AZ	2019-06-28	"Thousands of people enjoy this every year!"
Sandra Caballero	Long Beach, CA	2019-06-28	"I'm signing because this is my cousin and her family annual gathering spot. It's their favorite place to get together and have fun!"
Michelle Clarke	Central Point, OR	2019-06-28	"It's been open forever, don't take away our rights."
Nelda kent	Vacaville, CA	2019-06-28	"Nelda Kent"
Paul Cronin	Capistrano Beach, CA	2019-06-28	"where else can I get rad yo?????"
Colin Higgins	Oxnard, CA	2019-06-28	"We want our dunes back brah."
JENNY PLANT	Palm Springs, CA	2019-06-28	"My family enjoys camping, riding, swimming, socializing. We need to keep ohv parks open."
Chris Watters	Wylie, TX	2019-06-28	"Thousands of acres already set aside for 6 snowy plovers , this is insane. Isn't this state communist enough?"
Darla Metcalf	Simi valley, CA	2019-06-28	"We love going there as a family! One of the only cool offroading and camping spots left in California!"
Emily Lambert	Ridgecrest, CA	2019-06-28	"We come to the dunes at Pismo a couple times a year and love every single second of it. Public lands should stay open to the public!"
Jeff Ayuso	Riverbank, US	2019-06-28	"I think it is crazy that this is really a possibility. Thousands of people have fun every year in pismo. We have been going for years and have amazing memories and I want my boys to make the same memories there. Not only is this a family fun spot but this place supports the entire community! Thousands of jobs will be lost and the city will die along with all the small businesses we support! We have to fight to keep the dunes open."
Jeff Bradshaw	Las Vegas, NV	2019-06-28	"Because this is supposed to be a free country"
Antoniette Maya	Chula Vista, CA	2019-06-28	"I think it's only fair"
Tracy Yeomans	Enterprise, AL	2019-06-28	"My family and I have enjoyed the going to the dunes for many many years creating many many irreplaceable family memories.  The impact this will have not only on local businesses but from ones all over the area as families just like ours converge to this popular locale will be devastating."
Eddy Eavenson	Tucson, AZ	2019-06-28	"Keep taking, no reason too, there is plenty of space elsewhere"
Kawika Jarra	King city, CA	2019-06-28	"It's a place for people that pay taxes and have an outlet for having fun with there Big toys and work hard for the family and they need this place to stay open regardless of what happens Good or Bad just limit certain stuff and times Etc and keep this place alive #savethedunes"

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Jessica Savage	La Mesa, US	2019-06-28	"This place is awesome!"
Joshua Russell	Blodgett, US	2019-06-28	"I love to ride, always have my whole life. Love the dunes and memories it has given me"
Brianna Dingman	Redondo Beach, CA	2019-06-28	"This is something my family has done many times on family vacations out here and for this to be taken away would be so wrong. So beautiful and so fun to do. Don't take this away!"
Alfonso Rodriguez	Arroyo Grande, US	2019-06-28	"I'm new to the area 7 months and the dunes are by far the best pass time ever I HAD MY BROTHER AND SISTER 1st time that we are all together due to pass family decisions and we all hung out at the dunes . What amazing memories we made together and now We wanted to make it a family date every 3 months brother lives in Oregon and sister Redlands this is our meet location."
Jodi Stevens	US	2019-06-28	"OHV land needs to be protected."
Jimmy Ashment	Farr West, UT	2019-06-28	"I'm signing because where I live the govt wanted to close many OHV areas that were already opened for OHV and the people won"
Shaun Bagley	Visalia, CA	2019-06-28	"Recreation on the dunes is a part of history"
Russell Toman	San Diego, CA	2019-06-28	"Went to pismo and it's a great time, it was a long time ago but there already was lots closed off when I was there. Pismo doesnt need to be shut down. Gonna force the pismo community into extinction if it does shut down."
Teri Tassin	Fontana, CA	2019-06-28	"To keep Oceano open for families to enjoy together!!"
Barbara Jensen	Coarsegold, CA	2019-06-28	"Those residents of the senior living homes had to sign a document that they knew they were buying next to a recreation center and there would be lots of dust."
Sam Lanning	San Diego, CA	2019-06-28	"I want to continue having a recreational area for our families to enjoy with people that care about our land and safe use of off road vehicles, UTV's, motorcycles and RV's to have an area designated for that use. Responsible people can make sure those rights are not infringed upon."
juan jimenez vega	Arvin, CA	2019-06-28	"I grew up going to Pismo and riding the dunes, camping on the beach. These are some of the best memories of my childhood."
Brittany Broadbent	Dallas, TX	2019-06-28	"My family has had so many memories here and I would love to bring my little family there."
Darcy White	US	2019-06-28	"Darcy M White"
yavanna anderson-chiancone	Richmond, CA	2019-06-28	"I oppose any closure of Oceano park dunes. Stop taking the fun out of California!"
Sydne Holder	Quincy, IL	2019-06-28	"This cause it's important to my California friends and family"
Gen Hernandez	Rancho Cucamonga, US	2019-06-28	"A family tradition would sadly end."

Name	Location	Date	Comment
gregory rossi	Martinez, CA	2019-06-28	"I'm signing because 'Merica"
Madalyn Andrade	Visalia, CA	2019-06-28	"Madalyn Andrade"
Veronica Hecker	Fresno, CA	2019-06-28	"I'm signing because my yearly camping trip is being Jeopardized! My family loves our year camping trip!"
Chris Metcalf	Sacramento, CA	2019-06-28	"The government has too much control and they dont always know what is right for the people ."
Jennifer Hinkle	Manteca, CA	2019-06-28	"In support of friends and their families."
Virginia Castro	Beverly Hills, US	2019-06-28	"It's always a fun place to go! Most of us go there to unwind"
Hillary Bean	Bakersfield, CA	2019-06-28	"I love going to the dunes�"
Bennie Dones	Hanford, CA	2019-06-28	"Love the dunes"
Kayla Brackson	Newport Beach, CA	2019-06-28	"I love camping and riding the dunes! It's a treasure of the coast and brings revenues to the local municipality!"
Scott Goerzen	US	2019-06-28	"It is a great place for a family getaway"
Alisa mccoy	Lincoln, CA	2019-06-28	"Please keep this place alive. It's all childhood memories are made there"
Jessie Erwin	La Grange, CA	2019-06-28	"This was a huge part of my husbands childhood and we want it to be apart of our boys childhood."
David Sunderman	Manhattan, KS	2019-06-28	"Because send it酪"
Jeanette Squieri	North Las Vegas, NV	2019-06-28	"People need to be able to go and have fun"
Ron Gross	Morristown, TN	2019-06-28	"Ron Gross"
Sandie Filipiak	San Francisco, CA	2019-06-28	"My son and grandsons have spent much time there and would like to continue."
Britnei Quevedo	Blythe, CA	2019-06-28	"We grew up here and would love to keep the memories goin."
Bree Case	Santa Barbara, CA	2019-06-28	"I grew up going here and I've always looked forward to taking my daughter when she is finally old enough. Please don't take away the dunes"
Joannes Boman	Laguna Niguel, US	2019-06-28	"My adult children continue our annual Pismo Beach camping adventures that began 35 years ago. Maybe the California Coastal Commission should focus on methods to keep the park open with the help of the thoughtful citizens who have enjoyed and protected Pismo."
Jennifer Guzman	Stanford, CA	2019-06-28	"This is a family favorite spot."
Stuart Williams	Rocklin, CA	2019-06-28	"This area needs to remain open for use! I have been coming to this area for the past 40 years! If this closes it will not only be a

Name	Location	Date	Comment
			disappointment for future generations, but will do irreversible damage to the local economy!"
Emmanuel James	Hanford, CA	2019-06-28	"Family's look forwards to this. It's a place for great fun I have family always going out their and it would be a shame for them to have to go somewhere else. Keep it open ."
Mark Hall	US	2019-06-28	"Keep America Free!"
Julia Price	Taft, CA	2019-06-28	"I go there with my family and my granddaughter loves to ride her quad"
Jennifer Escalera	Walnut Creek, CA	2019-06-28	"The dunes are a fun family friendly thingh to do that's bring a lot of business to Pismo and surrounding areas."
Dawn Wong	Las Vegas, NV	2019-06-28	"I believe it's a need"
Scott Moore	Glendale, CA	2019-06-28	"I enjoy this OVA"
Hank DeVries	San Luis Obispo, CA	2019-06-28	"I enjoy camping and riding at the Dunes"
Terie Fightmaster	Tucson, AZ	2019-06-28	"The people should get to choose."
Elaine Blackwell	Porterville, CA	2019-06-28	"I want it to stay open."
Tiffani Moses	Reseda, CA	2019-06-28	"This should not be closed"
Elena Newton	US	2019-06-28	"I am signing because there are hundreds of miles of inaccessible coastline and very places people can enjoy like the the Dunes. Closing the Dunes would kill a lot of local businesses and jobs and deprive the Californians of the rare opportunity to enjoy the Dunes. We oppose to the closing!!!!!"
Shannon Webb	Yuba City, CA	2019-06-28	"They should have stricter alcohol consumption laws. Don't make everyone suffer. KEEP IT OPEN!"
Emanuel Barros	Santa Cruz, CA	2019-06-28	"I believe this the right thing to do!"
Jonathan Burgess	Fresno, CA	2019-06-28	"Jonathan Burgess"
Heath McBee	Herriman, UT	2019-06-28	"Heath McBrr"
Teodosio Tijerina	Los Angeles, CA	2019-06-28	"Our family camping trips and memories are here and should continue"
Jessica Ashley	US	2019-06-28	"I love pismo!!!!! The city wouldn't make nearly as much if it was closed down. And the poor businesses will loose everything they have to offer."
Brandy Harvey	Clovis, CA	2019-06-28	"A place to spend with family and friends.!"
Rodney Cortez	Vista, CA	2019-06-28	"It's the right thing to do. It gives people happiness to have this recreational area I have been visiting there for years."

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Leticia Fleischer	US	2019-06-28	"Leticia Fleischer"
Matthew Lorenger	Santa ana, US	2019-06-28	"We love pismo great place to enjoy time with friends and the kids."
Jordan LaMotte	Oakland, CA	2019-06-28	"It needs to stay open for Public use."
Andrew Flemmer	Yorba Linda, CA	2019-06-28	"Legendary and historical spot for the town and ohv users. Will heavily affect both groups, more so the town if it were to be shut down from ohv use."
Craig Colson	Bakersfield, CA	2019-06-28	"We want our rights and freedoms to ride back, they have already closed most of the dunes off."
Evening Stewart	Baldwin Park, CA	2019-06-28	"Preserve our Dunes and our ability to visit and enjoy them!"
Tyler Mcduffie	Hesperia, US	2019-06-28	"Ive Been going to pismo for as long as i can remember and would love to continue going. I haven't even got to take my daughter There yet"
Rebecca Larsen	Los Altos, CA	2019-06-28	"Love the area and believe in allowing access!"
Rosendo Tellez	Houston, TX	2019-06-28	"It belongs to the people of California!!!!"
Marcus Drescher	Las Vegas, US	2019-06-28	"Leave the fun stuff alone!!"
Keith Crisp	US	2019-06-28	"The dunes helps SLO County's economy thrive"
Felicia Dunn	Angels Camp, CA	2019-06-28	"I love the dunes"
cheryel sebbo	garden grove, CA	2019-06-28	"Cheryel Sebbo we need to keep places like this open"
Julian Bracken	Santa Monica, CA	2019-06-28	"The dunes are for family fun and recreation."
Yasmani Duran	Fresno, US	2019-06-28	"I grew up riding there"
Trevor Thompson	Bakersfield, CA	2019-06-28	"I love the dunes it's been apart of me ever since I've been a kid and the dunes is what makes pismo, pismo."
Corrina DeLaRosa	Grover Beach, CA	2019-06-28	"I love the recreational fun that the dunes offers"
Berenice Regalado	Santa Clara, CA	2019-06-28	"Please keep open. Our Family camps there all the time. We look forward to our trips all the time."
Adam Gibeault	Denver, CO	2019-06-28	"To support!"
Gage Loeks	Albany, US	2019-06-28	"Riding in the beach is the best"
Mike DeClark	Anaheim, CA	2019-06-28	"I pay my taxes! I enjoy riding with my friends and family, you have no right to close these very limited areas designated to Camping and OHV rights."
nancy rice	Chico, CA	2019-06-28	"Since I was a child I've loved Pismo. My children & grandchildren deserve the right to those same type of memories"

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Neiko Costa	Fairfield, CA	2019-06-28	"There is nothing to do around here, they need to stop taking everything away !!"
Brenda Goatcher	Zephyrhills, FL	2019-06-28	"It just right to"
dmp fasteners inc stankovich	Chatsworth, CA	2019-06-28	"This is out land not the politicians"
Brenda Goatcher	Zephyrhills, FL	2019-06-28	"It's one of the last things people can afford to do not everybody can afford these fancy Parks like Disneyland it's family vacations for some people"
Josh Sandoval	South San Francisco, CA	2019-06-28	"I love Pismo and it should stay! Reached out to communities all around California"
William Fodor	Irvine, CA	2019-06-28	"The love of camping"
Daniel Rossback	Coos Bay, OR	2019-06-28	"I love OHV recreation. Enough is a enough!"
Gonzalo Gomez	Las Vegas, NV	2019-06-28	"This is America"
Eve Hunter	Bakersfield, CA	2019-06-28	" My family has been coming here for years there are so many memories that we cherish and we would love to continue making more our family grows all the time are younger ones need those memories to"
Sarah Sellinger	Bell, CA	2019-06-28	"I love pismo"
Randy Cox	Hesperia, CA	2019-06-28	"I'm signing because I do not think that any more ohv trails should be closed."
sean blanchard	Ventura, US	2019-06-28	"We need more OHV trails not less"
Amber Yarbrough	Titusville, US	2019-06-28	"I'm signing because I believe in there rights"
Josh Proctor	Midland, US	2019-06-28	"We should have recreational access to places like this"
Eve Hunter	Bakersfield, CA	2019-06-28	"So many memories made their through the years and so many more to come"
Tim Reilly	Clovis, CA	2019-06-28	"Enjoyed riding in the dunes since I was a kid! The economic impact on the locality will also be brutal! Please don't do it!"
Maxwell Schwede	San Diego, CA	2019-06-28	"I love the dunes and all SVRA and OHV areas!"
Nathan Denogean	Tucson, US	2019-06-28	"I like riding those dunes!!!"
Roger Rodriguez	Fresno, CA	2019-06-28	"There is no reason other than greedy people to close these dunes down. They keep pushing and pushing and its coming to a head."
Barbara Lukas	houston, TX	2019-06-28	"I SUPPORT MADELINE, A FRIEND I RESPECT AND HAVE KNOWN FOR OODLES OF YEARS. GO MADELINE!!"

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Tom Gintz	Sylmar, CA	2019-06-28	"Keep our OHV areas open! We have generations of families with traditions of going off-roading! Our children deserve to enjoy off-roading just like the generations before them!!!"
Scott Butler	US	2019-06-28	"It's an amazing place that have brought many of friends and family's together to ride on the dunes. Please keep it open"
Mark Crawford	My Vernon, OR	2019-06-28	"I'm tired of the government taking all of our offroad areas away!"
Nickie Zepeda	Santa Maria, US	2019-06-28	"My family has enjoyed countless vacations here and everyone should have those opportunities."
Jerry Giralde	Fresno, CA	2019-06-28	"I was here first so the nayers can just leave."
Danielle Kennedy	San Clemente, CA	2019-06-28	"The dunes are a huge attraction for not only tourists that visit but for the local people of SLO county. Riding quads at the beach has always been a favorite past time for families, including mine, to look back on and to plan future trips to enjoy together. Taking away something like this from the locals when it's been such a huge part of our community growing up for generations is such a hard pill to swallow. It's a big business for locals in town as well so not only are you taking away a huge piece of our communities lifestyle and a local attraction, you're also taking away jobs and incomes unnecessarily."
Lydia Eaton	Folsom, CA	2019-06-28	"Please leave our beach alone!"
Elijah Esteban	Salinas, CA	2019-06-28	"keep open need this for quality family time and to enjoy the gift of life on ocean earth."
Jaggar Vanarsdalen	US	2019-06-28	"We need more places to ride"
Melissa Folks	grover beach, CA	2019-06-28	"My family has been raised in the dunes, my kids are now being raised in the dunes. We camp out there once a month and are on the beach weekly. Meeting new people and having great family time"
christine thomason	Garden Grove, CA	2019-06-28	"Christine Thomason"
Joshua Stark	San Diego, CA	2019-06-28	"It's a place for family and friends to enjoy riding in the sand and dirt plus spend time together eating food and hanging outside the big city."
Amanda Berry	Paso Robles, CA	2019-06-28	"This is a short stretch that I use to run. There has to be a solution that doesn't ban people. There's plenty of beach that's closed to the public. The committee should find a solution that works for people, or they should stop working for the public anymore."
Carrie Beth Johnson	Upland, CA	2019-06-28	"I love the dunes. Please keep them open for many more years. I am a Ventura County resident and the dunes are so different."
Dee Coats	Blythe, CA	2019-06-28	"We need our campgrounds so that families have a place to go and enjoy our beautiful country, and it is a designated area"

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jennifer edgington	rogers, US	2019-06-28	"Why take away such a great family friendly place???? Riders gotta ride, and this place is and has always been awesome! Please keep it OPEN for our kids and all the generations to come! :)"
Tyler Miller	Phoenix, AZ	2019-06-28	"This is bs let people have their fun we're stimulate the economy with how much is spend on us having fun just so they can make it a private beach for rich people"
Debra Hilbrands	San Jacinto, CA	2019-06-28	"We need every single one of our parks to remain open"
Peter East	Australia	2019-06-28	"Like to ride take my kids grow without drugs"
JoAnn Gillespie	Martinez, CA	2019-06-28	"I an advocate of using this open space for recreational use for motorsports. If we do not give the public approved spaces to do this legally it will end up happening illegally. Charge the users the fees that are needed to keep the area clean and functioning but keep it open."
Deborah Duell	Folsom, CA	2019-06-28	"While it is very true that public lands must be cared for, it is also true the public must continue to be allowed top utilize."
Beemer Pat	US	2019-06-28	"I am signing because I think it is important to have a place for families to be able to get out and enjoy riding in a safe environment."
Arthur Holmsky	Rancho Cordova, US	2019-06-28	"All OHV parks need to be protected. This is a place for friends and families to come together and enjoy a stretch of beach with the stress relief of hobby vehicles, fishing, surfing, and camping. 13000 acres are already closed. Over "dust." The ocean breeze moves the sand into the community not our rigs and foot traffic. I grew up next to the beach, worked in this community, and take time to relax from life and work here. Don't close it down, ruin tourism, damage the economy and hinder young generations from learning to care and maintain the outdoors."
Nick Masarie	Redwood City, CA	2019-06-28	"For the people that don't like the dunes, stay off them or move away.I am signing this petition for my right to enjoy this beautiful area with my OHV and turbo diesel pickup!"
Sanford Nichols	Fontana, CA	2019-06-28	"I care"
Rachael Schaefer	Sacramento, CA	2019-06-28	"I support local businesses!!"
Cody Campbell	Costa Mesa, US	2019-06-28	"Been a duner since I could walk ��"
Vince Paredes	US	2019-06-28	"I love camping on the dunes. It's a state park I can't abide the closure of a state park that has been the source of so many good memories"
Alex Kaplenko	San Ramon, CA	2019-06-28	"More bureaucratic overreach."
Justin Frew	Los Angeles, CA	2019-06-28	"Stop trying to close places that allow fun times for many of families and friends!"

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Brian Gabriel	Ogden, UT	2019-06-28	"Public land should be open and available for all forms of recreation"
Karen Lane	Oakdale, CA	2019-06-28	"I believe in the cause."
Jessica Hoskins	Citrus Heights, CA	2019-06-28	"This place has been this way for 100 yearsstop trying to stop people having fun"
Gerardo Ponce	Stockton, US	2019-06-28	"This is a vacation spot for our family, we go 5 times per year."
Christian Morris	san diego, CA	2019-06-28	"If you take away my off road paradise, you may catch me throwing roosts in your yard路♂#"
Laycie Bugna	San Jose, CA	2019-06-28	"Why would you take away a fun place where families and friends make many memories with their children. You will ruin family traditions all over the place."
Clarissa Cooper	Clovis, CA	2019-06-28	"Piano needs oceano dunes for all the income it brings to the local businesses"
Amanda Blake	Lompoc, CA	2019-06-28	"We need to protect our recreational assets."
Garret Matsuura	Grover Beach, CA	2019-06-28	"I think closing the dunes would be a tremendous hit to the local economy as well as a real loss to the people who use and enjoy them responsibly. Keep them open!"
Mike McBride	Salinas, CA	2019-06-28	"I'm signing because we need places like this for family to go to.���"
Selaina York	Fresno, CA	2019-06-28	"My family loves camping here! It's a tradition"
Yulissa Galvan	Vernalis, CA	2019-06-28	"Keep it open!!!!!"
Anjanett Perez	Corona, CA	2019-06-28	"I am signing this because I love going to the desert with family & friends making memories."
John Nunamaker	Las Vegas, NV	2019-06-28	"Recreational lands are necessary. In addition with the expansion of cities our access diminishes. This should need get be allowed. You earned people to work and pay taxes, give them a place to play"
Ryan lamar	Valencia, CA	2019-06-28	"Always has been a great place for fun and family."
Harold Schroeder	Earlwood, Australia	2019-06-28	"Kathy schroeder"
Brian Soto	Copperopolis, CA	2019-06-28	"I live Oceano"
Miguel Galindo	Fontana, CA	2019-06-28	"Stop this!"
carolynn simmons	Reedley, CA	2019-06-28	"I love the dunes!"
Erik Pinedo	Greenfield, US	2019-06-28	"Been riding there since I was a kid. Would like to share with my kids one day"

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Mary Alba	Visalia, US	2019-06-28	"My mom loved the Beach so in her memory we made a tradition to go every year on the dunes had brought our family closer we love the dunes"
Nic Stone	Merced, CA	2019-06-28	"Don't punish the masses when only a few people are the real problem!"
David Barnett	Carmichael, CA	2019-06-28	"This is a good place to have fun for the whole family!"
Avelardo Trujillo	Perris, US	2019-06-28	"The most amazing place to go off-roading no other place is better than pismo"
David Randall	Hanford, CA	2019-06-28	"Its a shame they are trying to take mire of our riding areas away"
Megan ash	bbbb, AL	2019-06-28	"Shutting down the Oceano dunes will be a huge hit to the community."
Donald Overacker	Santa Clara, CA	2019-06-28	"I love the freedom of driving camping and fishing on the beach"
Manuel Gonzalez	Sanger, CA	2019-06-28	"Great memories and fun!"
Nick Weeks	Riverside, CA	2019-06-28	"Because this is an off road spot, you guys don't want people riding their toys on the street then keep us a place to ride. Classical place to ride."
Brett Marshall	Hesperia, CA	2019-06-28	"Keep it open"
Jonhatan miguel Ocaña amezcua	Mexico	2019-06-28	"Por que me gustaría conocer"
Stacy Porter	San Fernando, CA	2019-06-28	"you should never close it too many people enjoy it"
Delaney Smith	Cortland, NY	2019-06-28	"My cousin, Blake"
Grabiel Gonzalez	Fresno, CA	2019-06-28	"I'm against it being closed down ,"
Richelle Nunes	Campbell, US	2019-06-28	"Because this place is amazing"
Diana Shaw	Middleton, US	2019-06-28	"This place is too beautiful to not be shared."
Michaela Sarratt	Hesperia, CA	2019-06-28	"This was one of my best childhood memories. I want to bring my children there someday!"
Luis Sanchez	Covina, US	2019-06-28	"It's an awesome place my son loves it!!!"
Trista Loftus	Atascadero, CA	2019-06-28	"im signing because i love riding bikes out in the dunes."
Cooper Baltezore	Reno, US	2019-06-28	"We deserve to have a place to ride our bikes"
Teresa Gibson	Bakersfield, CA	2019-06-28	"The central coast needs this revenue for the local businesses to survive and the locals to keep their jobs."
Daniel B	Valencia, US	2019-06-28	"My kids won't have the opportunity to enjoy this unique place as I had if the dunes close down. Our children are expected to grow up in an ever restrictive social environment and are forced to grow

Name	Location	Date	Comment
			up too fast. This trajectory must stop for the sake of our future generation's sanity. Please help to keep the dunes open for all Californians!!"
Manuel Munoz	US	2019-06-28	"My childhood was spent here. It's a wonderful place"
Claudia Nakamura	Salinas, CA	2019-06-28	"There's to little place to have fun like this."
Michael Stevenson	Winchester, US	2019-06-28	"Keep it open for memories and family fun."
Tim Brumm	Lincoln, NE	2019-06-28	"Keep it open!"
Tina brown	Fresno, CA	2019-06-28	"I spent a lot of my childhood on these dunes! Great memories �"
Lori Leming	Nipomo, CA	2019-06-28	"Lori Leming"
Eric Beaty	San Diego, CA	2019-06-28	"The delicate snowflakes of the off-road community need their safe spaces too."
jose soto	Clovis, CA	2019-06-28	"Love this place best place to camp and create memories w friends and family do not close �"
James Nicolai	San Jose, CA	2019-06-28	"I'm signing because we should have access to open spaces for people to enjoy!"
Darren Hickman	Portland, OR	2019-06-28	"These lands should be open for responsible use!!"
Timothy Roach	US	2019-06-28	"Too many of us have been robbed of these recreational parks over the years because of stupid ass liberal politicians. Where is our tax money going?!"
Cathy Sowders	Poole, KY	2019-06-28	"I have so many amazing memories, I would hate for it to close"
Sam Metler	Olean, NY	2019-06-28	"Keep our rightbto open spaces and fun."
Darren Vieira	West Covina, US	2019-06-28	"I went here back before the last closure."
Austin Hardwick	San Jose, US	2019-06-28	"It's our right and freedom to use these lands. You can't just shut everything down . Keep them open to and for the public use"
Max Brenicb	Antelope, CA	2019-06-28	"Riding is fun, the only thing that keeps me in this state I like oceans dunes better than other ones"
Francois Pepin	Central Point, OR	2019-06-28	"Outdoor recreational activities are foundational to family, emotional and physical health. OHV use is one expression of outdoor activities and has a long tradition at Oceano dunes. Losing this venue would be a huge loss to the people and businesses associated with it."
Michael and Fay Rabe	visalia, CA	2019-06-28	"The Oceano Dunes are one of my Family's favorite places to spend time riding and enjoying the recreational camping."
Mike Domenichelli	Windsor, US	2019-06-28	"Camping is great"

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Regina Hill	Taft, CA	2019-06-28	"I have been camping at Oceano dunes since I was born in 1972. So many good memories. I know take my grandchildren to give them the experience that myself and my children have had. I live in Kern County so we come up to escape the heat from the valley."
Jon Clifford	Los Altos Hills, CA	2019-06-28	"Every year public space for enjoyment is taken away. Im sure that all the angst is probably from new residents who showed up and complained unjustifiably about their new environment. Sad"
jared culwell	Corona, CA	2019-06-28	"because pismo dunes are incredible and has been an awesome place for family fun for way too many years to just shut it down"
Patricia Dill	Taft, CA	2019-06-28	"I have been going since I was little and I have taken my kids since they were born, i want to continue to take my kids and see my future grandchildren there having as much fun as we do."
Aaron Johnson	Hanford, CA	2019-06-28	"I thing they should be allowed on the beach! I have several friends that go there for that reason!"
Melisa Ortiz	Fontana, CA	2019-06-28	"I want the Dunea to be available as they are today."
Janine Urias	Acampo, CA	2019-06-28	"I'm signing to help keep Oceano accessible to the public!"
Michael Martin	Los Angeles, CA	2019-06-28	"Every year more and more Public Lands are being closed to public off road uses."
Kat Taylor	Santa Cruz, CA	2019-06-28	"Pismo is a family place to have a open area to ride dirt bikes and quads in a safe environment! It's a family staple"
Kevin Smith	Arnold, CA	2019-06-28	"Kevin Smith"
Joe Camilleri	San Francisco, CA	2019-06-28	"We need to stand up and stop letting the government take away public land useage rights."
Cody Lemos	Lathrop, CA	2019-06-28	"My childhood was spent riding here"
James Cunha	Fortuna, CA	2019-06-28	"I love that place"
Robert Jenkins	Yuba city, CA	2019-06-28	"There is not enough riding areas already"
Bonita Westmoreland	Taft, CA	2019-06-28	"Because it's not right what they are trying to do. Those beaches and dunes belong to all people"
Rose Mary Maciel	Tulare, CA	2019-06-28	"Rose Mary Maciel"
Gabriel Wood	San Carlos, CA	2019-06-28	"because I love dirt biking"
Dean Karch	Springfield, OR	2019-06-28	"Dean Ksrch"
Destinee McKinney	Camarillo, CA	2019-06-28	"I'm signing because I love piano dunes and I petition for them to not shut it down I have so many memories and it's such a fun place to feel free"

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Zac Marangi	US	2019-06-28	"I grew up going here and would love to come back and bring my kids some day."
Austin Ekman	Spanaway, WA	2019-06-28	"Because life with no riding sand dunes theres no life"
Justin Beaulieu	San Diego, US	2019-06-28	"ORV areas are getting smaller and harder to reach, this activity provides family activities for many people and provides safe riding instruction for future riders."
Karine Klempke	Arroyo Grande, CA	2019-06-28	"I love the dunes!"
Kand Jj	US	2019-06-28	"Im signing because this Merica!!!"
Zack Winn	Descanso, CA	2019-06-28	"Closing Oceano will just crowd other OHV areas!"
Cristine Hughes Adams	US	2019-06-28	"I want the dunes!"
Joseph Trees	US	2019-06-28	"America"
Yevhen Hlamazda	Sacramento, CA	2019-06-28	"I want it open"
Ashley Taylor	Simi Valley, CA	2019-06-28	"This place is my second home! We treat it with respect, it's a great place for family and friends to come together!"
Brendan Carothers	state College, PA	2019-06-28	"I love pizmo beach and I'm so sad they're trying to close it down. This is one of the most fun places I've ever been!"
Nicholas Andujo	Ontario, CA	2019-06-28	"AMERICA ROCKS."
terrie Dotson	Bakersfield, CA	2019-06-28	"This is public land. I object to a small minority squeezing us out of yet another healthy family pastime. This will have catastrophic effects on the local economy and put mom and pop stores out of business."
Melissa Hernandez	Bakersfield, CA	2019-06-28	"This has been the only reason we choose Pismo/Grover beach over others that are actually closer to us. This has been something I have been enjoying since I was a teenager myself and now my children are enjoying it too. If this isn't an option, I don't see us visiting anymore."
Steve Ellis	Mountain View, US	2019-06-28	"Get into the fight to keep Oceano open! Too many closures at happening!"
Vincent Z	Santa Maria, CA	2019-06-28	"This will destroy a city"
Nicholas Tucker	Roxbury Township, NJ	2019-06-28	"It's one of those places that make California a great place to live."
Jane Lorentz	Pomona, CA	2019-06-28	"I am signing because I love camping there. Lots of great memories"
Steven Pliett	Tucson, AZ	2019-06-28	"Please don't close this area!!"
Joshua Alves	Fallbrook, US	2019-06-28	"Such a great off road park would be such a shame to loose it"

Name	Location	Date	Comment
Kyle Mariana	Santa Ana, CA	2019-06-28	"Keep it open"
Dale Hyde	Novato, CA	2019-06-28	"I'm signing because I go here to have fun with my family and we don't do much together so if this gets taken away we will feel disconnected"
Hunter Bright	Idaho Falls, ID	2019-06-28	"I go out here all the time . To close it would be a terrible thing."
Emily Hammond	Tulare, CA	2019-06-28	"I have awesome memories here with my family!"
Reid McSwain	Palestine, US	2019-06-28	"I've been deployed with Titus. Give it here, I'll sign it."
Dennis Stansfield	Petaluma, CA	2019-06-28	"I'm signing because pismo beach was the only vacation I looked forward too as a kid. My family went every year and I would love to do the same with my kids one day. Pismo beach is my home and I would like to keep it that way"
Hunter bailey Bailey	Merced, CA	2019-06-28	"I go camping therr"
mark holland	byron, GA	2019-06-28	"It needs to stay open for another option for family fun"
Amanda Brown-Sage	Palmdale, US	2019-06-28	"No way man. We go to Pismo a few times every summer!"
michael dewese	Fairfield, US	2019-06-28	"Paid taxes for this and this is the one thing I agree with paying taxes for"
Anthony Coppla	Monterey, CA	2019-06-28	"There is no good reason to take away the rights to have fun in the dunes on quads, trucks, bikes, or trucks. He aren't harming anyone or vandalizing anything. The dunes need to stay for recreational usage."
Jerry Tobin	Denver, CO	2019-06-29	"I love nature and it should be protected for animals and recreational use."
Juan Carlos Carvajal	US	2019-06-29	"I want to"
Christine Sweeney	Spring Grove, IL	2019-06-29	"I care �"
Troy Patterson	US	2019-06-29	"It's the right thing to do"
Ethan Alatorre	San Francisco, US	2019-06-29	"People gotta realize they live by a dunes and expect the sand that flies around"
Caren Harville	Los Angeles, CA	2019-06-29	"Its fun, stop taking away good clean fun and crime will stay low. We love going here with our families and friends"
Mark peterson	roseville, CA	2019-06-29	"It's the right thing to do"
Susan Versal	San Jose, CA	2019-06-29	"For Brian"
ROGER WALL	WEST HILLS, CA	2019-06-29	"I've taken my kids there since they where 3I went there as a kid"
Torri Needham	Bakersfield, CA	2019-06-29	"It means alot to my friends to be able to have fun at the dunes"

Name	Location	Date	Comment
Randy Schaffner	US	2019-06-29	"If you don't have legal OHV areas you're just creating criminals out of law abiding OHV riders and families."
James Dumond	US	2019-06-29	"My boys did"
Jeffrey Robinson	Bakersfield, CA	2019-06-29	"We have been camping and riding there with my family and friends for over 35 years we have made lots of good memories with family and friends, also created some good friendships over those years. Please don't take any memories from our future generations."
Skyler Mckinney	La Habra, US	2019-06-29	"I support American freedom"
marjorie abagon	San Jose, CA	2019-06-29	"I want Oceano Dunes to stay open for everyone to see what a beautiful place it is. Don't end family traditions by closing the park."
Kayla Sejera	Pismo Beach, CA	2019-06-29	"I love the dunes rec area! Keep it open"
walter tyler	Canoga Park, CA	2019-06-29	"I also use the airport and enjoy the camping it makes a great adventure for my family and many others."
Mike Dalrymple	Salinas, US	2019-06-29	"When I was young we rode all over. Today we have lots & lots & lots of places to walk on the beach, this one little piece of fun MUST remain for OHVs!!!!!!"
Annmarie Thompson	Everett, WA	2019-06-29	"Ann Marie Thompson"
Jennifer Sprague	Los Banos, CA	2019-06-29	"I love that beach!"
Jason Wiese	Fontana, US	2019-06-29	"Great place to camp, dune and enjoy the beach at the same time."
Jessica Lisardi	Long Beach, US	2019-06-29	"Im signing this because I love riding and it seems like they r trying to make it impossible to tude anywhere."
Carlo Moreno	Fresno, CA	2019-06-29	"I ride at the dunes and want to continue to keep it open"
daniel eister	Atascadero, CA	2019-06-29	"Freedom"
TRACIE BOWDEN	CHINO HILLS, CA	2019-06-29	"Yet another thing the Government is taking away!"
Tina Jepsen	Buena Park, CA	2019-06-29	"All of my friends ride"
Courtney Blackmore	Sonora, CA	2019-06-29	"I've been going here sense I was a kid closing it would be stupid and not being able to use quads and stuff on the dunes that would end up just shutting the whole town down the town relies on tourist so keep it the way it is!"
Deserie Thigpen	Murrieta, CA	2019-06-29	"Keeping a family sport alive!"
debra albro	alpine, NY	2019-06-29	"Grandson, Dylan Iorio"
Steve Stellini	Discovery Bay, CA	2019-06-29	"Steve Stellini"
Will Gutierrez	Fremont, US	2019-06-29	"I want to keep it open!!"

Name	Location	Date	Comment
Josh Lockwood	Fresno, CA	2019-06-29	"I love camping on the beach and riding out there."
Louise Pillen Gainor	US	2019-06-29	"A few bad incidences don't warrant taking beach access away from so many people that frequent, and love, Oceano Dunes."
RJ Jackman	US	2019-06-29	"Public lands need to be available for public use."
Cheryl Pursell	Lodi, CA	2019-06-29	"Keep our places safegood time good place to have healthly fun"
Gerardo Carreon	San Marcos, CA	2019-06-29	"We need to have this place opened"
Jeffery Spellman	Shingle Springs, CA	2019-06-29	"I love this place and responsible ohv riding Is my life and love"
Shaun webb	Las Vegas, NV	2019-06-29	"I love to ride !!!"
autumn van hook	santa maria, CA	2019-06-29	"This is a place so many love and frequent ALL year round! We love the dunes and need it! Kids grow up and take their kids, family there for camping, riding, bonfiresso much to do and enjoy!"
Chuck Flores	US	2019-06-29	"Chuck Flores"
Helena Tarkington	Huntington Beach, CA	2019-06-29	"I'm signing this"
Jonathan Hoeft	San Jose, CA	2019-06-29	"I am signing because as a former and maybe future ATV rider, places to ride are far and few between. I've been to Pismo (Oceano) Dunes several times, all of which were with family. I would hate to see this beautiful, and awesome riding place be closed to future generations of off-roaders. Please, my family and I are begging you to keep Pismo open for future generations to enjoy!"
Lisa Castillo	Grover Beach, CA	2019-06-29	"Our families, our community and more enjoy this beautiful place and it would be taking away so much enjoyment for so many."
Don Townsend	US	2019-06-29	"I am sign I g because I want to have access to public lands. We keep the land clean."
Terry Gump	Reno, NV	2019-06-29	"Tired of losing more riding areas"
Brandon Siciliano	Waterford, PA	2019-06-29	"Because this is the only cool place in this stupid ass state. The only beach somewhat close that I can drive on and get away from everything and enjoy life in Cali it and is stupid ass rule"
David Boultinghouse	San Luis Obispo, CA	2019-06-29	"I have been coming here for 66 years the dunes are what brought a lot of people here and a lot of you moved here from other places ,I have seen little by little the closing of the beach for one reason or another . Theses dunes bring in over 100 million a yearWhere are you going to get that kind of revenue from the tax payers of the five cities area ."
Riley Owensby	Mission Viejo, CA	2019-06-29	"I am signing because the dunes Is my happy place"
Jessica Sopp	Pleasanton, CA	2019-06-29	"We have a right to use this earth responsibly for our pleasure."

Name	Location	Date	Comment
Nena Reyes	Los Angeles, CA	2019-06-29	"It should stay open."
Danielle McCall	Castaic, CA	2019-06-29	"Oceans Dunes has been a favorite place of my family's for many years. I would love to share it with my kids as they grow!"
Lupe Aragon	Long Beach, CA	2019-06-29	"My family and I love to camp there with our friends. We've gone camping there for several years and love it"
Thomas Walsh Jr.	Santa Clara, CA	2019-06-29	"I'm signing this petition because We Need to Keep Oceano Dunes Open!"
Ashley Tatum	Sacramento, CA	2019-06-29	"We love the Dunes! We basically live at the coast all summer and this would be detrimental to our family traditions!"
Stephanie Bustamante	Tulare, CA	2019-06-29	"It's a fun place to go and unwind with friends"
Richard Hartlage II	US	2019-06-29	"We need them and they should be open to all Americans"
Ed Pilkington	Santa Maria, CA	2019-06-29	"This is a bunch of idiots who bought homes near the Dunes. They knew what they were getting when they bought. Now they want to dictate like Nazis against the only place People have lots of fun. This reminds me of the Santa Maria Airport. People bought homes under the Flight Path of the Airplanes and then, they started complaining about the noise. I live in the line of the Airport and, when Planes fly i, we hardly notice the noise and, love to watch them come in to land. These fools should move to a Desert where the can get use to sand."
David Morris	Ramona, CA	2019-06-29	"So sick of Commiefornia taxing us more, and then taking more away. Have been paying off-road registration fees for 45 years, and finally saw improvement at Ocotillo Wells ORVP in the last 6 years. Remember when we were promised more off road parks/motocross tracks if we paid the off road fees????? Just like higher fuel taxes to fix roads/infrastructure, that never gets fixed. I'm so done with this State(of dillusion)after 65+ years here. I be gone, buh-bye!!!"
Robert Brockmeyer	Sparks, NV	2019-06-29	"Stop the insanity of declaring war on the lands that we ride on. Let us enjoy OUR sport OUR recreational time."
Chad Goodsell	Riverside, US	2019-06-29	"send it"
Marco Fiorelli	Fremont, CA	2019-06-29	"I want to keep enjoying this kind of recreational sport"
Raymond Cady	La Verne, CA	2019-06-29	"We all need a safe place to ride and drive off-road."
Kristy Callison Desotel	Bethel Island, CA	2019-06-29	"It is important to keep our precious dunes open for our 4 Wheeling fun. You close here you will close all of our access to beaches and ohv trails"
Jared Miller	Anoka, MN	2019-06-29	"I support nicki"
Mardi Sharples	Bakersfield, CA	2019-06-29	"It's what we do! Kids now should be able to experience the things we did as kids, keep tradition alive"

Name	Location	Date	Comment
Stevie Reese	Azusa, CA	2019-06-29	"I love to ride and haven't had a chance to camp here yet"
Desiree Doubek	Mountain View, CA	2019-06-29	"I went as a kid and it was an amazing experience!"
T. Elswick	Fernley, NV	2019-06-29	"We have the right to be on the beach as much as the Sierra Club."
Alex Aldaz	Cerritos, US	2019-06-29	"So sad"
Jason Selsor	Lancaster, US	2019-06-29	"I ride"
Brandon Oliveira	Newman, CA	2019-06-29	"This is ridiculous stop taking the fun of California soon all we will be able to do is stay in our 2ft x 2ft designated areas for fun."
maricruz escatel	Salinas, CA	2019-06-29	"Don't close"
Jennifer Way	San Dimas, CA	2019-06-29	"Jennifer Way"
Leonard Myles	fresno, CA	2019-06-29	"This place brings memories to hundreds of thousands of Californians. To take that away from us is like a slap in the face. Taking the ability to create more memories and love California for all the beauty and fun it creates is just wrong."
Joanne Fern	Llano, CA	2019-06-29	"I love being able to escape the Antelope Valley heat for at least a week. And camp and drive around the beach and dunesI am a native Californian and Pismo Beach every summer was the place to beI am now 57 years old and still enjoy camping with family and riding quads and side by side. We usually go with a group mother's father's brothers sisters friends grandkids we have family that lives in Los Osos and they even come on down to camp or spend the day. This is a state park and through out the years the park has shrunk and it is a unique place for ohv to play and campthis is the people's land and it seems that a lot of bureaucrats have been taking away the state park little by little by little which is a true shame for the people of California. I even remember cartoons back in the day when Daffy duck had to find Pismo Beach or bugs Bunny was going to Pismo Beach."
Maureen Karr	Boise, ID	2019-06-29	"Because these are our lands not the rotten government! We pay enough taxes to use whatever land we want. No Federal Government or State Government should have a say. Give us back our land!!!!"
Courtney Smith	Riverbank, CA	2019-06-29	"I love camping on the beach with my family. They are memories and traditions."
ted stotz	Escondido, CA	2019-06-29	"Sooooo many protected places. Please save the off-road recreation areas we have! Responsible use beats environmental overkill Do the right thing!"
Mark Fisher	Danville, CA	2019-06-29	"Some great memories shared with some awesome friends over the years, keep this beach as is!!"
Darrel Borling	Las Vegas, NV	2019-06-29	"I believe the people that been having fun all these years at the sand dune should be able to continue to have fun. And they have always took care of the dune"

Name	Location	Date	Comment
Phi L	Fullerton, CA	2019-06-29	"Keep this open and have better rules to be fair for everyone"
Stan Rodriguez	Pismo Beach, CA	2019-06-29	"I enjoy the dunes beach, living in Pismo Beach"
Keith Heckenliable	Los Angeles, US	2019-06-29	"All of these areas should remain open for people to enjoy what they have been doing for many years."
James Eckhardt	Sacramento, CA	2019-06-29	"STOP RESTRICTING OHV USE. Closing down legal wheeling areas will only make people wheel on your PRIVATE PROPERTY. The shrinkage of the ohv use areas at the dunes has lead to more accidents, some fatal. Let's be smart, stop thinking about the minority here (environmentalist) and do what's right for the people of California. For once."
Briana Juarez	US	2019-06-29	"Pismo Beach is a place like no other! I have made so many memories camping here since I was a little girl. Friends I know drive from super far places to come to Pismo, because nothing compares."
Peggy Pingry	Tehachapi, CA	2019-06-29	"These are public lands an no group of people have the right to take it away. The people should be able to vote on it. Government is out of control."
Todd Bunker	Modesto, US	2019-06-29	"Millions have been to Pismo to ride OHV, and for many it changed their lives for the betterI'm one of them, so is my family. Like most other OHV parks, it was there before people bought houses around it. Let it be what it is, and what it should remain as, a memorable OHV park on Pismo Beach."
Ryan Scott	Granite Bay, US	2019-06-29	"Oceano Dunes is a great place for families and friends!!!"
Shandi Tipton	Waterloo, WI	2019-06-29	"I grew up on the Central Coast and this was a staple everyone went to!! Everyone went to the beach to ride and drive!! It will hurt the economy horribly on the central coast!! Business that have been open for yrs will go under. There will be no money to keep up the beaches and the pier. Don't do this to Oceano and Pismo!!!"
lawrence decker	Los Angeles, CA	2019-06-29	"Because I believe in freedom."
Gerri Beaudin	Camp Verde, AZ	2019-06-29	"Keep dunes open"
vicente moreno	madera, CA	2019-06-29	"We dont have many places to ride."
Miguel Ruiz	Sacramento, US	2019-06-29	"Not only is it good for riding, it also brings a lot of income to the surrounding areas."
Jessa Miller	Bakersfield, CA	2019-06-29	"I love Pismo and have great memories camping & riding there with my friends & family. I can't imagine not being able to keep making more awesome memories there!"
Matt Leland	US	2019-06-29	"I have been a participant that follows the OHV regulations and enjoyed many great times in Pismo. I also have a 5 yr old that I want to be able to enjoy the fun times at Pismo dunes!! Please keep it open!!"

Name	Location	Date	Comment
Hector Hernandez	San Jose, CA	2019-06-29	"Hector hernandez"
Lawrence Burke	Novato, US	2019-06-29	"I'm signing to keep Oceano Dunes SVRA open . I love riding there!"
Carolyn Hassid	US	2019-06-29	"I vacation a few times a year and have tons of fun on the dunes. Keep them open please!!"
Richard Wright	Puyallup, WA	2019-06-29	"The oceano dunes are a twice a year stop to enjoy company of friends, a weekend in the outdoors, and motorsports. Please don't simulatneously end this tradition and do irreversible harm to the local economy!"
Jim Geddes	Lakewood, CA	2019-06-29	"Everyone has a right to enjoy the dunes."
Ron Shipley	US	2019-06-29	"This is such a great place to take your family and get away"
Angela Pardue	Cerritos, CA	2019-06-29	"This is a very fun family place. It has tons of memories for my family. For over years and years"
Jake Romero	Oakland, CA	2019-06-29	"Grew up at the dunes. Great place to spend time with the family!"
Cody Frantz	Aurora, US	2019-06-29	"Love the dunes bro"
Vicky Huettis	Oakdale, US	2019-06-29	"Vacation destination yearly my family grew up with!!!"
Afatasi Bae	Samoa	2019-06-29	"Nofoiluma Logoai"
William Campbell	US	2019-06-29	"because i believe people in the off road community need their places to ride"
Chris Seals	US	2019-06-29	"Chris Seals"
Elizabeth Devine	Murrieta, CA	2019-06-29	"No need to over regulate"
James OBrien	San Bernardino, CA	2019-06-29	"Good clean fun."
Cassandra Luther	Simi Valley, CA	2019-06-29	"I believe it needs to stay open to camping"
Jared Mattos	Fresno, CA	2019-06-29	"Lots of memories here, can't imagine it being gone"
Kevin hart	Los Gatos, CA	2019-06-29	"I want to save pismo"
Kolin Lampkins	Coarsegold, US	2019-06-29	"Tradition"
Brianna Killion	Pomona, CA	2019-06-29	"Some of my fondest memories are located here camping with family"
LISA ENGELS	NOVATO, CA	2019-06-29	"Lisa Engels"
Sally Rotta	US	2019-06-29	"I grew up by the dunes and it wouldn't be the same."
DeAnn Reynolds	Martinez, CA	2019-06-29	"The state needs to stop taking our land for their selfish reasons.Enough already"

Name	Location	Date	Comment
Deborah Coatney	Lagrande, US	2019-06-29	"It should stay open, i love setting on the beach, an lot's of memories."
Allen Daffer	Pleasant Grove, UT	2019-06-29	"It's the right thing to do."
Jeremy Cottrell	Alhambra, CA	2019-06-29	"This is an important place that needs to stay open for families. It has been enjoyed for generations."
Jenna Cordoza	Sebastopol, CA	2019-06-29	"Many memories riding in pismo!"
Katrina Danford	Beverly Hills, CA	2019-06-29	"Close down the Coastal Commission!"
Steven Moss	Oceano, CA	2019-06-29	"I'm signing because me and my wife work out in the dunes and this is are jobs are income our livelihood at steak. Please keep them open"
Brian Anicker	Scappoose, OR	2019-06-29	"OHV areas such as this are vital to local economies. Those of us in the ohv community are among the only groups that actually pay our own way and for use of OUR public lands."
Erick Gonzalez	Van Nuys, US	2019-06-29	"So many memories and fun times."
Scott Nelson	South Jordan, UT	2019-06-29	"Scott Nelson"
Kai Clark	Rohnert Park, CA	2019-06-29	"We need places to ride. I have many wonderful memories there over the years."
Ian Bowen	Vacaville, CA	2019-06-29	"Keep the ohv park open!"
Morgan Betts	Northridge, CA	2019-06-29	"I visit once a month"
Samantha Katilus	Lodi, CA	2019-06-29	"Its the last place in California that you can ride OHV on the beach. It's 13,500 acres and we can only ride 1,300. 10% is a fair trade to nothing!! This beach also supports localEconomy and pays into the tax system! We have been coming here for many years now and creating many memories! This place is special to us and would break our hearts to see it go. Liberal california is trying to take everything good away. Stop them and save oceano dunes!!!"
Debra Johnson	Oakland, CA	2019-06-29	"My family and friends go to the dunes every year"
Darla Pool	Fresno, CA	2019-06-29	"Darla Pool"
LUANNA Nelson	Tehachapi, CA	2019-06-29	"I love to off-road at pismo"
Doug Britton	Arroyo Grande, CA	2019-06-29	"I've spent some of the most happiest time in my life in the sand at the Oceano Dunes. Starting 60 years ago, as a baby in my mothers arms, till last weekend when my Mother was Baptized in the ocean at the end of Grand Ave. Off Ramp. Don't close the beach it would be a Big Mistake."
Teri Smith	Burbank, CA	2019-06-29	"Keep the area open"
Jose Gonzales	Bakersfield, CA	2019-06-29	"My friends need a place to go!"

Name	Location	Date	Comment
Charley S. E. Savnik	Pollock Pines, CA	2019-06-29	"It's right thing to do, that's why! Get it?"
Tasha Judy	US	2019-06-29	"There's no reason not to"
Jennifer Solo	Grass Valley, CA	2019-06-29	"I remember these were the first sand dunes I ever rode Memories for a life time!! When I think Pismo Beach, I dont think of anything except riding my first quad on the sand for the first time!!"
Taylor Underhill	US	2019-06-29	"Being in the army we utilize this area to train soldiers how to properly navigate in deep soft sand without spending a large amount of money to travel else where."
sandie vedder	riverside, CA	2019-06-29	"Do not want the dunes closed!!!"
Nick Uplinger	Grover Beach, US	2019-06-29	"I drive the beach"
James Jansto	US	2019-06-29	"I have been going for over45 years and want to be able to for many more plus for the future of the surrounding business if you take this away you take the heartbeat from the towns that are adjacent to the dunes"
Zachary Stout	Saint George, UT	2019-06-29	"clean"
john graham	Lynnwood, WA	2019-06-29	"I want to keep riding the dunes"
Pete Dottore	Tujunga, CA	2019-06-29	"Pete Dottore"
Helmut Gareis	Lathrop, CA	2019-06-29	"It's our to use!!!"
Brandon Hooper	Campo, CA	2019-06-29	"I have the right to!"
Richard Cruz	San Antonio, TX	2019-06-29	"I choose to"
Robert Campbell-Taylor	San Miguel, CA	2019-06-29	"Even though I haven't driven the dunes for many years I have wonderful memories. I would hate to think that this last beach dunes access will be taken away. Please stop all the whining and hand ringing."
Arvin Sihota	Fresno, US	2019-06-29	"Braaaaaapp"
Randall Meith	US	2019-06-29	"Public land is meant for the public"
Adam Wilson	US	2019-06-29	" I am signing the petition because I love going to the dunes with my family. I go to the beach about six times a year and spend a lot of money over there. I don't think it's fair that they can take something away from other people."
Maritza Ceja	Simi Valley, CA	2019-06-29	"Because it belongs to the people."
Gary Gomez	US	2019-06-29	"I love camping and I love to visit the oceano dunes. It's our right to ride."
Ken Manning	Rancho Cucamonga, CA	2019-06-29	"Kenneth R. Manning"

Name	Location	Date	Comment
Chris Mcleod	Topanga, CA	2019-06-29	"I have been riding here my whole life. I have memories of being a kid playing in the sand, riding quads, camping and surfing!"
Clara Morales	Maywood, CA	2019-06-29	"Because friends and family love creating memories here"
Steve Derra	US	2019-06-29	"The dunes are a family tradition"
Dina Einboden	Elko, NV	2019-06-29	"Dina Einboden"
Steve Evans	Livermore, CA	2019-06-29	"I'm signing because I hate overreach by those who do not like something so they seek to limit or restrict other's right to be a free American."
Abe Ghazai	US	2019-06-29	"Abe ghazai"
Christian Munoz	Clovis, CA	2019-06-29	"I love the dunes"
Dan Simmons	cottonwood, CA	2019-06-29	"If you don't like living by the off-road area move it was there before you."
Julio Del Real	Chula Vista, CA	2019-06-29	"These dunes have been part of the family tradition for years.  Cannot be closed down by people who do not actually go to pismo beach."
Ann Cookson	Salida, CA	2019-06-29	"I've never enjoyed the dunesbut the local economy is largely dependent upon them and the visitors they bring. Keep it open to riding."
Brett Fisher	US	2019-06-29	"It is important as an American to have this right and choice and to go out and have fun ."
regina bennett	Porterville, CA	2019-06-29	"This place is special to many families and part of their yearly traditions."
Karen Nagao	US	2019-06-29	"Karen Nagao"
Sabra Hosmann	Folsom, US	2019-06-29	"Folks who enjoy off road activity need places to go and Pismo is a great place to go that brings friends n family together"No" vote on closure!!!"
Laura Pena	Reno, NV	2019-06-29	"I believe in our rights."
Clint Sims	Springtown, US	2019-06-29	"Only reason I would visit the state"
Ricardo Mendoza	El Paso, TX	2019-06-29	"We need to preserve access to public lands"
Jeramy Lahman	Modesto, CA	2019-06-29	"The dunes need to stay open. There's more people that camp and visit than the retired old fucks that live there. Lol"
Luis A. Lopez	Union City, CA	2019-06-29	"Signing for the cause!"
maureen fitzgerald	sunnyvale, CA	2019-06-29	"We need to keep the camp ground open.used to go there all the time. It would be so sad if it was closed"

Name	Location	Date	Comment
sharon fletcher	Palm springs, CA	2019-06-29	"Xoxoxoxo"
Kathy Cecala	Huntington Beach, CA	2019-06-29	"The dunes are beautiful and I enjoy my time there! Please don't close them. They are iconic for families!"
Robin Crossland	US	2019-06-29	"My family loves going to the Dunes!"
Zack alexander	Fresno, CA	2019-06-29	"Because I don't want the dunes to close just to spite the people who moved into community's where the natural wind blocks (aka trees) were cut down."
Jeff Crilly	Palo Alto, CA	2019-06-29	"Keep it accessible for future generations."
Cory Noreen	US	2019-06-29	"I'm signing because losing pismo OHV would be terrible"
Carrie Sousa	Vacaville, CA	2019-06-29	"Carrie Sousa"
Gayleen Roit	Oceano, CA	2019-06-29	"I'm probably in the minority of wanting restrictions . No night riding or riders under age 21. But closing with no way to keep the income in our area is death to a lot of people s income ."
Vince Sanchez	Long Beach, CA	2019-06-29	"This land was made for you and me!!"
Joshua bennett	Sacramento, CA	2019-06-29	"It's the same thing as Sacramento raceway . They build houses right by the racetrack people buy these houses knowing the racetracks there and been there for 40-50 years but then want the racetrack closed because it's loud on weekends. All people know the dunes have been there for years but now one at close because the sand. Remember the government always knows what's best �"
Philip Schuyler	Los Gatos, CA	2019-06-29	"Keep this historic OHV area open"
Dave Smith	US	2019-06-29	"Everyone should be able to use this national treasure"
Adrian G Rodriguez	Upland, CA	2019-06-29	"I like to ride my dirt bikes out there with my dad and family and get to have a good time and together there. I can't even believe its being closed or for riding"
Michael Ricci	Camarillo, CA	2019-06-29	"The dunes are a special unique place for ohv that doesnt exist anywhere else in the 1000+ miles of western coastline. Having a scant couple of miles for ohv should be oreserved."
Tyson Buchanan	Ramona, CA	2019-06-29	"Tyson Buchanan"
Derrick Mccullough	Hayward, CA	2019-06-29	"There is now way this park can be closed. Really California we pay to ride here it's not free everyone should go camping here and try it before you knock it cause it will change your life"
Desarae VanStory	Phoenix, AZ	2019-06-29	"I grew up in the sand favorite family vacation."
Timothy Morin	Riverside, US	2019-06-29	"We need these dedicated areas or they will end up in other areas that they should not use."
Joey Avellino	Palmdale, CA	2019-06-29	"Joey Avellino"

Name	Location	Date	Comment
Jimmy Kwong	San Leandro, CA	2019-06-29	"One of my favorite places to enjoy the space"
Quincy LaGrone	Los Angeles, CA	2019-06-29	"NESTOR NESTOR I"
Garrett Padgett	Lompoc, CA	2019-06-29	"This is a long time tradition among central coast residents. It's a way to connect with family past and present because litterally anyone can have fun on the sand. We've stood by for generations hearing about the dunes closing and we've seen them shrink it to the small area it now covers. It's also a"
Cindy De Leon	US	2019-06-29	"Cindy de León"
Brent Guertin	Nuevo, CA	2019-06-29	"Brent Guertin"
Christine Davies	Redding, CA	2019-06-29	"Christine Davies"
Robert Brewer	Dayton, US	2019-06-29	"I like camping!"
Danielle Boyer	US	2019-06-29	"This is a great location to ride and bring family and friends together. Most of us grew up riding here with our parents and friends and want to share those same experiences with our children"
Brian Kennedy	Earlimart, CA	2019-06-29	"We go and have a lot of fun over their.have been going for years."
Sandra Centoni	Novato,, CA	2019-06-29	"It's a great place to have good clean family fun on the weekends �"
RodneyandTeri Nall	US	2019-06-29	"I live in the area and had t heard about this. I don't understand the state wanting to close the Dunes when it's going to have a financial impact on our area as well as impacting so many families that use the area for recreation. I had an idea that something was up when for about the past year I was getting "air quality warnings" for Nipomo Mesa area. If I'm able to I will attend and support. DONT CLOSE THE DINES!!!!"
jacob hulsebus	Alhambra, CA	2019-06-29	"Jacob Hulsebus. Don't let them close another riding area. It's a domino effect."
Ty Grega	Las Vegas, NV	2019-06-29	"I've gone and want to keep going it's worth the trip when everyone goes out"
Anthony Romero	US	2019-06-29	"I love coming to Pismo I always have a great time with family and friends!"
Trevor Berg	Rancho Santa Margarita, CA	2019-06-29	"So much history and a great spot"
Rex Strite	Los Angeles, US	2019-06-29	"OHV as for the public"
Anthony Borges	Atwater, US	2019-06-29	"Such a great place for family and friends"
Jessica Valencia	S.Maria, CA	2019-06-29	"It's our Coast and 1 out of 2 of the only places that you can legally drive on the beach. This is tragic to see anyone lose their life or loved one but everyone knows the dangers and is risking themselves out there. There are many folks who enjoy and take

Name	Location	Date	Comment
			proper precautions out there as well. Be it as it may We got to keep the Dunes open. Period."
Nanci Castro	Lompoc, US	2019-06-29	"This is a nice place! People enjoy spending time here with friends and love ones"
Jennifer Biggs	Orcutt, US	2019-06-29	"Ending this will not only take away 1 more thing that CA residents deserve but it will destroy the economy in the Five Cities areait really worries me how negatively it will affect the area and the livelihood of the residents."
Leslie Rodriguez	Tulare, US	2019-06-29	"Keep it open !!"
Dylan Jennings	Kaneohe, HI	2019-06-29	"It's not right to take what's not yours"
Christian Garcia	Castro Valley, CA	2019-06-29	"America!"
Daniel Alvord	San Jose, CA	2019-06-29	"A"
Denise Hinman	Apple Valley, CA	2019-06-29	"This place is awesome and has been here for years. Plus it will take away the profits the community gets from people vacationing there."
Jacqueline Rubio	Santa Maria, CA	2019-06-29	"We need to keep this open. This is an open and relaxing family place that should be protected and regulated better! But not closed!! We need to keep this open, we can not keep taking away things to do around here. Having more to do around here doesn't only help keep people busy, but also helps keep youth out of trouble."
Edward Baldonado	US	2019-06-29	"Memories are made here. And I have many"
Melissa Kintner	Pismo Beach, CA	2019-06-29	"We love camping and driving our Jeep on the beach. People just need to slow down."
Sokha Kann	Fresno, CA	2019-06-29	"Love it there!!"
Pamela Martin	Roy, UT	2019-06-29	"This is my home and some day I would like to come back."
jeffery bohrer	Grover Beach, CA	2019-06-29	"This is an important part of our area's history and economic future."
Brian Taravella	Los Angeles, CA	2019-06-29	"Fuck off CA."
Kelly Sierra	Wasco, CA	2019-06-29	"We take our five kids every year to enjoy the beach there! It's our fave place to go"
Matthew Logan	San Jose, CA	2019-06-29	"You're a good man with a good cause"
Karla Elias	San Luis Obispo, CA	2019-06-29	"This will ruin all the businesses nearby. Tourists coming to the dunes helps all the businesses around not just the dunes."
Sue Mead	Williamstown, MA	2019-06-29	"Sue Mead, Williamstown, MA"
Stella Mcdermott	Santa Rosa, CA	2019-06-29	" Because signing is the right thing to do on this issue!"

Name	Location	Date	Comment
Jose Mcpherson	US	2019-06-29	"The dunes should be a place that can be enjoyed by everyone. They should not be closed."
Wade Long	Sacramento, US	2019-06-29	"Please help"
CINDY HENKEL	SEATTLE, WA	2019-06-29	"People need to be able to get out and enjoy themselves."
Aaron Fryc	Lompoc, US	2019-06-29	"Funny how the people who enjoyed the dunes as kids are now complaining "it's too loud!" Keep the fun at the beaches!"
Carlos Prna	Bakersfield, CA	2019-06-29	"Carlos Pena"
Ramon Masongsong	Covina, CA	2019-06-29	"These types of activities are what keep kids out of trouble, as well as teach them skills, fun, competition and friendships!!!"
Adolfo Gasparalvarez	Jacksonville, NC	2019-06-29	"There's way more negative activities and hobbies these kids could be part taking in. Dont want them there? Build them a place to go do this"
Patricia Damato	Valencia, CA	2019-06-29	"I think there are some plac"
Ted Fletcher	Paso Robles, CA	2019-06-29	"The Oceano Dunes off road area is a treasured Central coast recreation area. I believe it helps keep young people and adults active and outdoors. I grew up and lived a mile from the dunes for 27 years and never had any issues with air quality. Closing it would be devastating to the community and to the economy"
Steven Gonzalez	Chula Vista, CA	2019-06-29	"Love riding"
Jasmine Hewitt	Columbia, MD	2019-06-29	"Keep the dunes open!!"
Drew McLean	Dublin, TX	2019-06-29	"Because it's a Californians Right to have a place on the ocean to enjoy life activity not just a special few quit taking away areas of enjoyment for the hard-working class the real taxpayers of California ."
Alicia Davis	Port Orange, FL	2019-06-29	"Why take away something that is fun and takes kids off the streets"
Kristen Surrett	New Port Richey, FL	2019-06-29	"Best times of our family trip is at pismo."
Dawn Cummins	Taft, CA	2019-06-29	"Family make memories there, me and my boys have a lot of memories, don't take that away from family's"
Evan Kunert	poway, CA	2019-06-29	"I grew up going out to the desert riding quads and dirt bikes. I've always wanted to go to pismo to ride but have never gotten the opportunity. Would like that to still be a possibility someday."
Dawn Edwards	Mankato, MN	2019-06-29	"Why would they even close these?!"
Samuel Winningham	Buena Park, US	2019-06-29	"This is soo messed up"

Name	Location	Date	Comment
Mike Borges	Turlock, US	2019-06-29	"There's nowhere in California to ride by the ocean but there's plenty of places to walk by the ocean let's keep this open for our future kids to enjoy and stay out of trouble"
Melissa Webster	Las Vegas, NV	2019-06-29	"To close this would be ridiculous!"
Shaun Lopez	Vacaville, CA	2019-06-29	"I'm a long time fan of the dunes being just the way they are."
Hillery Bell	Paso Robles, CA	2019-06-29	"It's not right what their doing."
Carl Thompson	Madera, CA	2019-06-29	"It won't be long and we won't have nothing fun to do. I'm sure their are some rich people and houses near by that are behind the closure."
Rusty Howard	Twin Falls, ID	2019-06-29	"many other ways can be taken action then closing down sites for others that love and enjoy it."
Chanda Meloni	Modesto, CA	2019-06-29	"Please keep recreation parks open for all of California people! We need for our youth!!"
dave kovacs	el granada, CA	2019-06-29	"i enjoy ohv closing pismo beach would be a horable blow to california this is one of our last beaches that we can play in as a disabled american this is the only way i can get out on the beach so by closing oceana dunes you taking away accsess for the disabled and we pay fees every year to increse ohv areas if your closing areas your going back on your word"
Marie Berini	San Mateo, CA	2019-06-29	"The Beach and Ocean belong to no one we all should be able to enjoy the Dunes at Pismo"
Aaron Cockerill	Los Gatos, CA	2019-06-29	"I'm signing because my family have been enjoying these dunes for years and I'd like to see that continue for my grandchildren"
Anjelica Valencia	San diego, CA	2019-06-29	"We need to keep it clean so it should stay that way at all cost"
Derec Chumley	Bakersfield, US	2019-06-29	"There's 840 miles of coastline in California. Leave 2 for off road/camping."
sandie lohse	Hanford, CA	2019-06-29	"Sandie Lohse"
Robert Strickler	US	2019-06-29	"Although I have moved out of California. Pismo holds lots of good memories for me."
Andrea Mundell	Boise, ID	2019-06-29	"It's not ok to close the places America loves"
D. V. Mallory	Truckee, CA	2019-06-29	"Recreational areas in America are fabulous. Working well and playing together makes us stronger, gives us something to look forward to and creates goals for us to set for ourselves. Preserve America's endangered teenagers. Let them have their Sandboxes."
Marvin Sumpter	Las Vegas, NV	2019-06-29	"I'm sick of the "MAN" holding us down !!!"
Esa Meza	Bakersfield, CA	2019-06-29	"Esa Meza"

Name	Location	Date	Comment
Gerardo Gonzalez	Sacramento, US	2019-06-29	"I want my grandkids to be able to enjoy the same places I been able to ride. They are at the age where they can operate atvs now and with the large fires we've had in California there are some riding spots that are still closed for repairs. We don't need less places to ride we need more. With all the time everyone spends at work we need a fun way to relax and enjoy company with family and friends. Riding and camping is the way to have fun."
Doug Lawyer	Fountain Hills, AZ	2019-06-29	"Great family recreation area."
Yvette Kettering	Long Beach, CA	2019-06-29	"Do not destroy beautiful places people have enjoyed for years"
Jensen Shipley	Kaysville, UT	2019-06-29	"Dunes are freakin badass"
Gary Huelle	Apple Valley, CA	2019-06-29	"I believe this recreational area need to be kept open so all can enjoy the beach area. There are hundreds of miles of beach open to people only. While just a minimum is set aside for recreational vehicles on the whole west coast."
Joseph martinez	Watsonville, CA	2019-06-29	"I enjoy this place"
Nathan James	Paso Robles, CA	2019-06-29	"Nathan james"
Mike Impey	San Jose, CA	2019-06-29	"California is still a Republic =for the people by the people not the Coastal commission liberal whack jobs Fight back now!!!"
Natalie Bibas	Oxnard, US	2019-06-29	"I support activity!!!"
Talia Sundstrom	Clovis, CA	2019-06-29	"My family and friends have been camping on the dunes for YEARS! It's one of my absolutely favorite places. It would hurt the surrounding towns so much if it was shut down. The "dust" pollution which is sand will still blow around even if there is nobody there!"
Danielle Robinson	Gilroy, CA	2019-06-29	"There is no Pismo without dune buggies!!!! If passed the town will lose a lot of its tourists and visitors, thus lowering its economy."
Daniel Pal-Freeman	Lodi, CA	2019-06-29	"I think it should be open for all"
Valerie Perkins	San Jose, CA	2019-06-29	"We need to protect outdoor activities!!!"
elaine mapes	perris, CA	2019-06-29	"It is one of the safe places for families to go and enjoy!!!"
karie grasseschi	Sacramento, CA	2019-06-29	"My sons are into dirt bikes and they need places to ride. We are taking away everything that is fun to do!"
Smooth As Glass	Riverbank, CA	2019-06-29	"Such a selfish decision, you have miles and miles of beech more than enough to give a small slice of it to public camping and OHV riding. I've been going for two plus decades, my kids have enjoyed this area since they started riding and they love it. Have you even considered the economic ramifications of closing the park? It will destroy the local economy and leave many people without a way to support their families. Please reconsider your decision. Jeff Glow"
Ashley Tatum	Sacramento, CA	2019-06-29	"I totally agree! We live near a racetrack and the same exact thing happened! How ignorant can people be to buy a home and sign an

Name	Location	Date	Comment
			agreement that you are aware that you live near a racetrack and then complain about the noise!? Ultimately, they closed down our racetrack. I'm hoping the same doesn't happen to the Dunes. Pismo and all surrounding cities will lose massive amounts of money from all the tourists staying at the Dunes!"
Alberto Lozano	Chatsworth, CA	2019-06-29	"Freedom to enjoy our land"
John Hendrickson	Lincoln, CA	2019-06-29	"This place is really awesome and great for beach camping with the family! Please keep this open!"
Josh reeves	Coarsegold, CA	2019-06-29	"Because I've been going there since I was a baby it's an awesome place and yes people need to pack and pack out which I am a true believer in and do as I say great place for kids"
Daniel Rausch	San Jose, US	2019-06-29	"Daniel Rausch"
Rick Johnson	Oakland, CA	2019-06-29	"Closing this area will destroy the lively hoods of people on this are who depend on the tourism revenue."
Sharrie Talor	Tehachapi, CA	2019-06-29	"My kids grew up riding out there. Closing it is ludicrous."
Greg Bell	Lodi, CA	2019-06-29	"The ppl own the beaches why are you wanting to close them."
shaina lynch	fillmore, CA	2019-06-29	"Shaina Lynch"
Patti Fischer	Ballwin, MO	2019-06-29	"I wanted to"
rob vadnais	San Jose, CA	2019-06-29	"Please do not take away pismo dunes. Have been riding there ,with my family for 40 years."
Donald Sanchez	Hayward, CA	2019-06-29	"I trust the proponents of the petition."
Leonard Harris	Atwater, US	2019-06-29	"I am 65 years old. My first visit to the beach was magical. I was 18. My family has been going there ever since. While my kids were riding 4 wheelers and learning how to respect mother nature by not riding on vegetation and such a lot of the other kids their age were hanging out getting in trouble. And how bad can a rubber tire hurt sand. There are a handful of people that have property around the dunes that think they own them. Well you know what they don't. We all pay taxes in this state so we can have places like Pismo dunes to enjoy!The dust is gonna blow weather we ride there or not. Look out in the major deserts on a windy day! After all it is just sand.Now my grandsons have been riding there and they are turning into fine young men also.If you close the beach to riding it will be a sad day for a lot of people. And a happy day for few.Not to mention the millions of dollars in income the area will lose!"
Michael Magee	Springfield, OR	2019-06-29	"Great memories of riding at Pismo. Hope to return someday."
Jake Ruhga	Modesto, CA	2019-06-29	"I love that place"
Robert Garant	Palmdale, CA	2019-06-29	"I have been going there all my life and quite frankly there's no place like it. It's a unique experience. California politicians have infringed enough of our rights. Now our privileges too??"

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Glenn S	Walnut, CA	2019-06-29	"Great place to bring the fam for an awesome and memories!"
Ryan Holde	Lodi, CA	2019-06-29	"Pismo should be left open to ohv use"
David Patrick	Hollister, CA	2019-06-29	"It's our land, not the government."
Blaine Graybill	San Francisco, CA	2019-06-29	"I want to support my friend Sam"
tamara wynn	Los Angeles, CA	2019-06-29	"Keep it open"
Bernice W Maxwell	Paso Robles, CA	2019-06-29	"The Dunes a special place for recreation. Closing the Dines will benefit no one. Sand will be in the wind either way. Stop this closing right now."
victor sanchez	Los Angeles, CA	2019-06-29	"Don't lock it down sand dunes are for everyone to enjoy"
Timothy Bushee	Riverside, CA	2019-06-29	"I love to ride"
Debbie Lancellotti	Simi Valley, CA	2019-06-29	"gino lancellotti"
Isaiah Douglass	Moorpark, US	2019-06-29	"Out in the dunes we are not disrupting anyone's peace and sand does not catch on fire so ther is really no problem"
Victor Balcita	Citrus Heights, CA	2019-06-29	"Victor Balcita"
DiMario White	Chino, CA	2019-06-29	"Only reason I spend money in that city!!!!"
Tristen Butler	Pinon Hills, CA	2019-06-29	"This place has made the greatest memories for everyone that goes. No one leaves regretting the trip but looking forward to the next."
stephanie shapiro	Taft, CA	2019-06-29	"Good honest fun and yall want to take it away so sad for the future riders, and those of us who like to watch"
Leandrea Dean	Visalia, CA	2019-06-29	"It is the one place we go as a family and would hate to lose it."
Gene Martinez	Arroyo Grande, CA	2019-06-29	"Because the closure of Oceano Dunes would probably kill the Five Cities area of the Central Coast."
Taylor Jackson	Kuna, US	2019-06-29	"Sick of liberals trying to tell real tax payers what we can and can't do."
John Curran	Tyler, TX	2019-06-29	"I used to ride those dunes and want others to have the opportunity to make awesome memories like I have."
Kelly Hicks	Porterville, US	2019-06-29	"Closing the dunes would kill the all the surrounding cities!!!!"
Alison Kalustian-Delk	Fresno, CA	2019-06-29	"This is ridiculous"
James Baldwin	Royal Oaks, CA	2019-06-29	"I learned to drive there, and with so many ooen spaces being closed. We do not need another one shut down! These open space ORV parks allow families and youngsters alike to learn and enjoy motorsports!"

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Todd Mitchell	Nipomo, CA	2019-06-29	"I am signing as a Grover Beach resident who utilizes the OHV area on a weekly basis. I'm in support of State Parks running the show, potential to add a Southern entrance"
Eileen Bryant	Hughson, CA	2019-06-29	"Eileen Bryant"
Julia P	San Jose, CA	2019-06-29	"Grew up learning to ride on that beach and still go down there for riding and time with friends and family."
Stuart Burchell	Orcutt, US	2019-06-29	"I love it there one of my favorite places to ride"
Jennifer Neeley	Rancho Cucamonga, CA	2019-06-29	"We should be able to use this land."
Joe Montgomery	Sacramento, CA	2019-06-29	"I love that place"
Betty Walton	Fresno, CA	2019-06-29	"My family loves going there. Would hate to see it close."
Amy Phipps	Redding, CA	2019-06-29	"Amy Phipps"
Brian Risinger	Fresno, CA	2019-06-29	"I have been going to the dunes for 35 years with my family and want to share those memories with my children."
Elizabeth Willhelm	Taft, US	2019-06-29	"I believe we have the right to ride and camp on the beach."
Raymond Martin	Gilroy, CA	2019-06-29	"Pismo is part of who I am"
Ashley Lasiter	Shingle Springs, CA	2019-06-29	"California needs to stop closing riding areas and trails. It is ridiculous and heart breaking for so many people who enjoy this family recreation. California continues to push good people out of the state due to strict laws and regulations. Enough is enough."
Scott Williams	Great Falks, US	2019-06-29	"Recreational opportunities with family cement memories in children that last a life time"
Peggy Anderson	Porum, OK	2019-06-29	"I used to live in Oceano area. This is one of the best beaches out there. It is good for the economy there as well. People cone from far and wide to visit this beach because it is unique."
Arman Gorge	Portland, US	2019-06-29	"It's the right thing to do"
Nik Virrey	Sacramento, US	2019-06-29	"To protect our enjoyments."
david hale	Moneta, VA	2019-06-29	"Every family deserves a place to relax and have fun without being surrounded by tall buildings and pismo has always been a magical place for kids to learn to ride a motorcycle or atv and do it safely without worrying of falling on hard cement or dirt"
Joe Mitchell	Hendersonville, TN	2019-06-29	"I would not want to deny the fun for future generations."
Foster Schutt	10492 oliver road, US	2019-06-29	"We need places to ride because if there isnt legal places to ride, most riders will still ride illegally and ruin others property."
Justin Ferrigno	Valencia, US	2019-06-29	"I love riding and camping at the beach with my family!"

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Fernando Melero	La Habra, CA	2019-06-29	"Fernando melero"
Garrett Salmon	Highland, CA	2019-06-29	"Garrett salmon"
charles Bell	Bakersfield, US	2019-06-29	"charles Bell"
Haley Isaacks	Midland, TX	2019-06-29	"Haley isaacks"
shane seymour	Sugarloaf, CA	2019-06-29	"more closures means less fun and escape from the world, closures makes people trapped"
Monica Banuelos	Olivehurst, CA	2019-06-29	"I absolutely love Pismo and shutting it down would be a loss for not only my family but for generations to come!"
Rigo Fajardo	Indio, CA	2019-06-29	"This is how we keep families together! The dunes area family affair and we should keep them available for families all over"
Ashley Phipps	Bakersfield, CA	2019-06-29	"Love going to the dunes and riding out there"
Randy Phillips	Corona, CA	2019-06-29	"No political group should have a say in closing off public use land thats been utilized in this manner for decades. This is still america and the people and only the people (not representatives) make these decisions."
Tera Cringan	Goodyear, US	2019-06-29	"It's not right."
Margaret Taylor	Sonora, CA	2019-06-29	"It would be a shame to not have this open and be able to enjoy it as a community"
michael pierson	Kingman, AZ	2019-06-29	"Fed up with the state and federal government taking away our land that belongs to us to be able to use and enjoy"
Tila Marshall	Lafayette, IN	2019-06-29	"To many great places for recreation disappear all to often. Do not take away from those who follow rules and do the right things."
219-344-7400 mason	La Porte, IN	2019-06-29	"Recreational use of public land is important."
Joseh Hamilton	Palmdale, CA	2019-06-29	"For the love of riding"
Robert Atchley	Fresno, CA	2019-06-29	"We want to keep camping"
Dylann Thomas	Temecula, CA	2019-06-29	"I've never been there and want to experience it in its entirety"
elijah ell	Ojai, CA	2019-06-29	"We should have a place to ride dirtbikes and camp, otherwise everybody will do it ilegally where you are not aloud to ride or camp. We need a place to have fun and blow off steam!!"
Leonel Polanco	San Francisco, US	2019-06-29	"Leonel Polanco"
David Vazquez	US	2019-06-29	"Mm? I agree"
Wendy A Mariani	Alameda, CA	2019-06-29	"We need to keep positive and healthy activities for our childrenOur Future!!!!!"

Name	Location	Date	Comment
tiffany Kuykendall	Sanger, CA	2019-06-29	"This is a family tradition to get away and relax on the dunes 3 times a year for 5 days at a time"
George Weaver	Shoshoni, WY	2019-06-29	"Keep this open quit regulating everything and closing it This is another reason we vote trump"
Brian D	Laguna Niguel, CA	2019-06-29	"Brian Darga"
Darla Moore	Arroyo Grande, CA	2019-06-29	"The dunes need to continue being open and public for all to enjoy! We need our state parks open and available for happiness and adventure and our pursuit of life, liberty and justice!"
Manuel Avila	Hilmar, CA	2019-06-29	"This is the public's land not the Politicians."
James Tosta	San Carlos, CA	2019-06-29	"Please don't ruin the local community. Think about all the people involved. Stop overstepping and placing your narrow.inded values over everyone else's. Thanks"
Deema Sheyner	US	2019-06-29	"Don't tread on me!"
Celeste Walker	Arroyo Grande, CA	2019-06-29	"The dunes should not be closed. It's not economical. Try controlling the amount of people/vehicles allowed on them before closing them. Don't take my dunes away from me."
Penny Nordstrom	Valencia, CA	2019-06-29	"Stay open"
Nicole Arango	Simi Valley, CA	2019-06-29	"Please don't take away our dunes !!"
Gena Burnett	Fresno, CA	2019-06-29	"My family loves camping on the beach. We've been going there for years!!"
John Cleveland	Bakersfield, CA	2019-06-29	"I, with my family, enjoy the dunes and the local community. We spend in the local shops and restaurants to help support the community and local businesses. We love the beach and the dunes. We follow the rules, we pack out more than we carry in, we respect the boundaries, other riders and park officers. Thank you."
Mary Margaret Reiter	Anaheim, CA 92807, CA	2019-06-29	"Mary Reiter please keep this open"
Christina Gallice	Carlsbad, CA	2019-06-29	"Keep the dunes open!"
Rodney Dahlgren	US	2019-06-29	"This is sand folks! It's just sand! When the wind blows it also blows the sand into the air! no matter what happens the sand will move around on the beaches! The sand will change if people walk on the sand. The sand and landscape will change every time the wind blows!"
Gabriel Williams	Edinboro, PA	2019-06-29	"Dirtbiking is a crucial part of my life and if we keep losing spots to ride no one will do it anymore therefore suffocating the sport out of society"
Spence Grafft	Lahaina, HI	2019-06-29	"The Dunes provide many families a year a special getaway. Closing the Dunes would also have a huge impact on the revenue generated from tourism. Keep um open."

Name	Location	Date	Comment
Mason DePriest	Bullhead City, US	2019-06-29	"Let people have fun!"
michael hanrahan	glendora, CA	2019-06-29	"One of the best areas will be taken away from the people"
Justin Lee	Millville, CA	2019-06-29	"Cuz I'm tired of liberal ass holes. And I grew up on the dunes I want my child to take her kids there and feel the same happieness I felt"
Robert Gottenbos	Valencia, CA	2019-06-29	"I believe it's not right we are not able to enjoy this land our forefathers faught to keep free."
Brittany Fitzinger	Orinda, CA	2019-06-29	"Kevin fitzinger"
Greg Sullivan	US	2019-06-29	"I have visited Pismo many times for family reunions and we all enjoy the beach riding during the hot summer months. This will be a devastating economic impact on this small down."
Tracy Harmon	Redding, CA	2019-06-29	"We need recreational areas for people to go!"
Doug Boadt	Newport Beach, CA	2019-06-29	"Pismo Dunes is an institution. Closing would be canceling the fun for many in the ohv community and crushing the local economy."
Candice Jones	Porterville, CA	2019-06-29	"The dunes are a beautiful place for California's to go to have a fun time and make loads of memories! It is also a huge money maker for the local cities! Would be stupid to shut them down!"
Brian Huerta	Hanford, CA	2019-06-29	"This strip of coastline not only IMMENSELY benefits the entire area surrounding it from the millions it generates, but it is also a place for whats left of us country boys to gather and make memories at!"
Glenn Armstrong	Bodfish, US	2019-06-29	"We have little to nowhere to anything now as it is"
Sioux Mac Lauchlin	Morro Bay, CA	2019-06-29	"Closing the park will not solve the issues of air quality. You'd have to demand that Mother Nature stop the wind blowing. She'll laugh at you. Furthermore driving across the swollen creek is an issue of stupidity not an issue of regulation. You can't fix stupid. Regulating areas of use with temporary fencing is a more effective environmental approach while continuing to educate the public on the biodiversity that exists in and on the dunes. And for the folk at Triology who bitterly complain, DUE DILIGENCE was your option before you purchased your property. Any developer who knowingly develops in an area of IHV use and doesn't disclose it in the escrow documents is liable for neglect of disclosure. Lastly, visitors to ODSVRA, self moderation and respectful use of the State Park is KEY. Y'all know that. Speak with your fellow campers and unitedly work toward conservation and protection of this natural treasure."
Kathleen Graham	Frazier park, CA	2019-06-29	"Great place doesn't deserve to get shut down"
Desiree Villarreal	Visalia, CA	2019-06-29	"My family has been camping at the dunes since before I was born. We respect the rules and others. It is a shame we are being punished. I along with my children grew up in the dunes. Please don't take it from us."
mark kiernan	Sun Valley, CA	2019-06-29	"Keep OCEANO DUNES SVRA open!"

Name	Location	Date	Comment
Mike Cannell	Riverside, CA	2019-06-29	"CCC, don't ruin Pismo! Off roading at Pismo is loved by so many!"
Kindra Myers	Fort Walton Beach, FL	2019-06-29	"Pismo beach is known for riding on the dunes and camping. Closing it would not only kill pismo beach and SLO financially but would wipe out generations of traditions for many families."
Lillian Brim	Porterville, CA	2019-06-29	"Or recreational spots need to be clean and useable"
Tammy Hiromoto	Hesperia, CA	2019-06-29	"Families need a place to take their kids to have fun and to be a family!"
Rosie Valente	Stockton, CA	2019-06-29	"I believe the dunes should be kept open."
Virginia Ramirez	Cathedral City, CA	2019-06-29	"My kids live this place it is where are family comes together and enjoys the outdoors and beautiful scenery and get to meet new people."
Phillip Salgado	Antioch, US	2019-06-29	"Been going to the dunes since I was a kid and now I take my kids there for family vacations. Keep them open."
Victoria Yebra	Gonzales, CA	2019-06-29	"This is whatakes these Dunes unique. If the ban goes into effect. Your dunes will be just another Dune with nothing special or different to offer."
Keith Gilbert	San Luis Obispo, CA	2019-06-29	"I've been going to the Dunes for the last 30 years. I go at least twice a week every week to enjoy a early morning walk. It's one of the big reasons I moved to this area. Closing the Dunes would be a poorly thought out decision with major negative ramifications for the vast majority. Don't appease the loud minority by making a huge mistake and closing the Dunes. Ca has already infringed on our rights in so many ways. Stop it now."
Jeffrey Meyer	Auburn, CA	2019-06-29	"You've already closed a majority of the dunes, that if left open would have helped to reduce the congestion that happens now!"
Dan Barnett	Lake Elsinore, CA	2019-06-29	"Piano is our family destination every year. We really hope to continue our trips to Pismo. Please keep it open!"
Sandy Hodge	Grover Beach, CA	2019-06-29	"It is part of our community and draws many people to the area. Education and safety are needed - not closure."
tom cords	Yucaipa, CA	2019-06-29	"We can't allow government to control every bit of land it's wrong, may the dune reopen"
Suzanne Singleton	Visalia, CA	2019-06-29	"This is a special place and we should NOT close it because of a few morons! We already have morons running this state at the expense of its taxpayer citizens!"
Karen Starler	Simi Valley, CA	2019-06-29	"This place holds many memories and the location is one of few that remains that hasn't been closed by environmentalists."
Paul Visage	Hesperia, CA	2019-06-29	"California needs to stop taking stuff away from us the citizens"
Adrianne Holley	Daphne, AL	2019-06-29	"Keep OCEANO DUNES SVRA open!"

Name	Location	Date	Comment
Rubi Rivera	Visalia, US	2019-06-29	"They shouldn't have closed it �"
Jack Smith	Bakersfield, US	2019-06-29	"I've been paying my Green Sticker fee's for Years! Isn't taking care of the OHV Areas the whole point of that!"
Tino L c	Rancho cucamonga, CA	2019-06-29	"For us hardworking is a playground we deserve it"
Trenton Combes	Kearney, US	2019-06-29	"Trenton Combs"
Lori Aberle	Phelan, CA	2019-06-29	"Lori Aberle"
Isaiah Sanchez	Los Angeles, US	2019-06-29	"Even if this is a privilege, you can't take away a privilege from something we didn't do to deserve. There's a few idiots, but let us ride on!!!"
Husain Muhammad	South Ogden, UT	2019-06-29	"Recreational areas like these are diminishing to developers."
Robert patterson	La Grange, CA	2019-06-29	"Love the Dunes"
Sean McCombs	Lodi, CA	2019-06-29	"I believe we should keep them open especially for economic reasons."
Pernell Rush	Santa Maria, CA	2019-06-29	"It's the right thing to do. The Coastal Commission is a faceless group making decisions for us without giving thought to the overall economic environment this will cause!! Its a proven fact the dunes bring in millions of dollars in revenue to the central coast why would you stop this?"
Michael Allison	Avondale, AZ	2019-06-29	"My wife said too ���"
Michael Manuo	US	2019-06-29	"F#ck Trump (:"
Stephanie Gaitan	Hanford, US	2019-06-29	"Because"
Robert Forbes	Chico, US	2019-06-29	"Because I want to keep the dunes open."
Mark Hansen	US	2019-06-29	"We should have the right to ride there"
Anthony Enciso	Claremont, CA	2019-06-29	"We should be able to ride there"
Joseph Mitchell	Perris, CA	2019-06-29	"I've been going to Pismo Beach for years with my family to enjoy this unique off-road Paradise and want my kids kids to be able to enjoy it too."
Jim Romero	Downey, US	2019-06-29	"Because we have the RIGHT to do what are passion isCoastal commission is dictating were and what we can do. People complain about silica . The winds there create more silica then we would ever . I can wait till they try to stop Mother Earth from blowing the winds too hard . What's next ??????????"
Liz Barker	Ocean View, US	2019-06-29	"I like vacationing on the dunes"
Arielle McEwin	Corpus Christi, TX	2019-06-29	"I know people who love this place"

Name	Location	Date	Comment
Mike Pardue	Petaluma, CA	2019-06-29	"America we are the land of the free stop taking out rights away Trump just signed a bill making it so certain placed for off road riding cannot be closed so please stop trying to close the ones that where not mention specifically by him"
Jamie lafountain	Livermore, CA	2019-06-29	"We need to keep these open!!"
Chazell Derrick	Paso Robles, US	2019-06-29	"I've lived here for years I was there is a child I've taken my children there and I think they should just adjust safety instead of closing one of the last places down that you can go work right on the beach drive on a beach camp on the"
Karen Dress	Winchester, CA	2019-06-29	"The taxpayers and those who support this park have given enough reasons for this park to remain."
Krista Dodd	Hanford, CA	2019-06-29	"Grover Beach residentplease keep open."
Robert Evans	Stockton, CA	2019-06-29	"Cmon California."
Emiliano Lino	Santa Maria, CA	2019-06-29	"I'm a lifelong resident of the central coast and trust me I know the dangers of the dunes I have a cousin that had to learn everything over walking talking eating because of an accident on the dunes but I don't believe that it's the dunes fault it's people who aren't responsible riders that are out there and it's mostly Tourist that don't know the area who get in these accidents even the local residents are at fault sometimes that's why everybody needs to be careful when they are out there and stop trying to be evil kenevil because eventually they will ruin it for all of us that enjoy it on a daily basis."
Kathleen Carpenter	Tracy, CA	2019-06-29	"I'm signing this petition because the dunes are a special place for so many of us. Whether in foot or on wheels, we all share and love this place."
DONNA GONZALEZ	Hesperia, CA	2019-06-29	"I have enjoyed the dunes for many years with my family"
Rylee Henry	Bakersfield, CA	2019-06-29	"The dunes are my fav we can't lose them!!"
kaylee STROUD	Gates, OR	2019-06-29	"It's the people's land."
Patrick Connelly	Truckee, CA	2019-06-29	"I believe in keeping public lands open to the public . As an avid off road enthusiast much of what I have grow up with is now closed and may never be enjoyed again."
Garrett Ibsen	Rodeo, CA	2019-06-29	"More land should not be taken away from the public. I pay enough taxes that I should not be told where I can and can not go. S. R. H.!"
Dondre Young	Lebanon, TN	2019-06-29	"I grew up riding there and had TONS of great memories!"
Derek Durksen	San Jose, US	2019-06-29	"I have been camping on Pismo beach all my life. I went there as a kid and have taken my kids there now."
jim sergi	morgan hill, CA	2019-06-29	"It a good thing to have access to beach with cars on beach"
Catherine Cook	Sacramento, CA	2019-06-29	"California is over regulated already."

Name	Location	Date	Comment
Ian Carter	Big Bear Lake, CA	2019-06-29	"It's fun beautiful amazing camping place."
Gary Olson	San Jose, CA	2019-06-29	"Because we need more areas to ride not close down"
Juston Pearson	Castro Valley, CA	2019-06-29	"I am tired of environmental leftist closing rifle ranges, riding parks, businesses and everything else under the sun."
Mason McNees	Clovis, CA	2019-06-29	"I've grown up going to Pismo and it's mine and my wife's favorite spot to watch the sunset"
Misty Metheny	Fresno, CA	2019-06-29	"My family loves the dunes!"
Sammie Burnash	US	2019-06-29	"Because i am Friends with Tiffany, and it's a nice beach."
Tirso Cano Jr	Fontana, US	2019-06-29	"This helps the younger kids to be more adventurous and not be the ones stuck behind a screen all day."
Steve Mervau	Sutter, CA	2019-06-29	"A family that plays together, stays together. Not all families are bat and ball families basketball courts and baseball fields aren't exactly eco friendly lol"
Alfred Williams	Vero Beach, FL	2019-06-29	"Dr. Alfred H. Willuams V"
Jenny Phillips	Phoenix, AZ	2019-06-30	"I support Off road recreation"
Ronald Plaga	Antioch, CA	2019-06-30	"Pismo needs to stay open"
Ronald Turner	Whittier, CA	2019-06-30	"My family camps there annually. While there we spend a good bit of money that goes to the local economy. Closing the dunes will force beach campers to take their money elsewhere."
Alvaro Rincon	Imperial Beach, CA	2019-06-30	"Alvaro rincon"
Bobbie N Tina	US	2019-06-30	"Love going with the family ##"
MacNeil Ross	Cumming, GA	2019-06-30	"I love deb dawg!"
Stephen Bautista	San Jose, CA	2019-06-30	"I go every month"
Michael Luna	Pleasant Hill, CA	2019-06-30	"Pismo is great for family fun"
David Mitchell	US	2019-06-30	"David Mitchell"
Barbara Ferguson	Fallbrook, CA	2019-06-30	"I love the freedom of the open spsce"
Gary Foltz	Wasilla, AK	2019-06-30	"Si!"
Kellie Romine	Ahwahnee, CA	2019-06-30	"We need to do everything to retain our rights and access to our natural resources."
elton miller	Kennewick, WA	2019-06-30	"E.miller"

Name	Location	Date	Comment
Michael Rodrigues	Prather, CA	2019-06-30	"My family enjoys this recreation and supports others opportunity to experience it too. I'm tired of giving up riding areas and having to cram people who enjoy riding into smaller and smaller areas."
Jane Thurmond	Simi Valley, CA	2019-06-30	"This will have an unreal impact on the small business owners and economy of the immediate and surrounding areas. BIG MISTAKE."
Ed Pilkington	Santa Maria, CA	2019-06-30	"Are you speaking of Eddie Miller from 1959? He was a friend and Classmate of mine. Very nice person to run around with."
Byron Graves	Walnut Creek, US	2019-06-30	"I love pismo you can't close it to many memory's"
James Flinn	Clovis, CA	2019-06-30	"My kids and I love the dunes, sure some people are idiots and do dumb things but that doesnt mean the masses have to suffer for their mistake. Please think of the damage you will do financially to the city, Pismo is an attraction because of those dunes"
Jason Canby	Lompoc, US	2019-06-30	"Save the dunes !!!!!!! I have been going there for 40 yrs"
Peru Excell	Las Vegas, NV	2019-06-30	"I've used this beach and love it."
Andréa Lee Heaton	Dillsburg, PA	2019-06-30	"A safe environment with proper facilities should stay open for those who love this sport."
Tyson Holmes	West Sacramento, US	2019-06-30	"My family has been going here for 12 years now. It is the only OHV sand dunes left in CA. We are all for doing what ever is needed to keep this park open and clean for the future generations to use it."
Jeff Davis	Bakersfield, CA	2019-06-30	"We should have a place to ride off highway vehicles responsibly"
Daniel Mitchell	Jolon, US	2019-06-30	"I would be devastated to see something my family and many other family have enjoyed for generations. A traditional. I would be devastated to see the dunes be shut down and I feel as if the American dream and privilege is being taken away."
Brandon Kitchens	Bakersfield, CA	2019-06-30	"I would like to protect the rights for my kids to enjoy the same experiences I did by enjoying camping and riding at the dunes."
Preston Ullrich	Sweethome, OR	2019-06-30	"i love to ride"
Michael McManaman	Morongo Valley, CA	2019-06-30	"Stop taking away our rights to public lands!"
Elizabeth Nylen	Tucson, AZ	2019-06-30	"Grew up going to this beach. Please keep it open"
dan Clayton	Highland, CA	2019-06-30	"This would be a tremendous loss for California citizens, noise and dust complaints from residents that bought homes knowing that the dunes were a place for California citizens to enjoy themselves but now want to close it because they don't like it now is ridiculous. They should either relocate or get along, local businesses would be hurt, this would be a disaster for the local economy!"
Masis Abramian	US	2019-06-30	"I enjoy pismo"
Melissa Smith	Columbia, MO	2019-06-30	"I believe it needs to stay open"

Name	Location	Date	Comment
Bridgette Bowman	Escondido, CA	2019-06-30	"My friend asked me to and keeping places available to have fun is important"
Robert Smith	Lake Isabella, CA	2019-06-30	"I love the dunesAnd I'm not a jack ass"
Ramon Ramirez	Fresno, CA	2019-06-30	"Ramon Ramirez"
David See	Tulare, CA	2019-06-30	"David see"
Charlene Smiley	Merced, CA	2019-06-30	"It is the right thing to do"
Victor Gravley	Cloverdale, US	2019-06-30	"I grew up riding here and it a awesome place to take the family to ride and experience and enjoy the dunes."
Shaun Walker	Oakland, CA	2019-06-30	"Regulation sucks!!"
Bailey Dunn	Largo, US	2019-06-30	"Awesome place to go riding, and to go hang with friends and family."
Deborah Kohler	Martinez, CA	2019-06-30	"There are so few places to ride. Please keep the Beaches Open!"
charles blakeley	Clearlake, US	2019-06-30	"We need less OHV closures"
Jeremy Smith	Vacaville, CA	2019-06-30	"Because it's our right to ride on the dunes that are well protected and still look natural we have tremendous respect and educate others please leave us be"
Andrea Madrigal Palacios	Madera, CA	2019-06-30	"I want to keep making memories in the dunes and have fun with family and friends. I want to help local businesses that make money because the dunes exist."
Rob McCarthy	Avila Beach, CA	2019-06-30	"I have personally enjoyed the dunes for over 40 years. The Coastal Commission shouldn't be able to close down public use of public land."
Cory Peterson	Gardena, CA	2019-06-30	"This is American land not government land"
Chase Stipe	Cloverdale, CA	2019-06-30	"I want to"
Tim Powell	Folsom, CA	2019-06-30	"I have lived several lifetimes along those dunes and coastline back in the day with my best friend Ricky Charles Harper they should stay open for everyone to enjoy !!!!!"
Tyler Smith	Victorville, CA	2019-06-30	"Government overreach once again."
Aaron Guempel	Selma, CA	2019-06-30	"You would ruin the local economy. And rob my family of what they enjoy the most."
Sean Smith	Clovis, US	2019-06-30	"I dont want the area closed."
Katie Derrick	Folsom, CA	2019-06-30	"It should stay open. Outdoorsy people love to enjoy the beach on their quads and bikes. It is a beautiful tradition that inspires a love and respect of nature. And nature should be a natural right for all people to enjoy."

Name	Location	Date	Comment
Candi Murphy	Paso Robles, CA	2019-06-30	"Having a close option for our family to ride quads and dirt bikes is convenient and keeps our money in our county."
Stephan Kennedy	San Luis Obispo, CA	2019-06-30	"We need places like this for our children and our future generations to keep them outside and off of their cell phones computers and video games."
Kenneth Johnson	Tehachapi, CA	2019-06-30	"Because I support recreation."
Derek Hurd	Fowlerville, MI	2019-06-30	"I luv riden on the beach no better feeling"
Andy Traynor	Alameda, CA	2019-06-30	"To many public lands have been restricted limiting OHV use an family activities."
Carson combs	Aptos, CA	2019-06-30	"I love the dunes and grew up riding them. I want my kids to do the same."
Rachel Swanker	Clovis, CA	2019-06-30	"Love going there"
Kendra Shattles	Los Angeles, CA	2019-06-30	"I want to help preserve and Save."
Robin McAfee	Thousand Oaks, CA	2019-06-30	"I've spent many wonderful days and nights on this beach with ATVs. There are so few places like this. Please keep it open to ATVs and camping so we can continue to enjoy it for years to come."
John Ringer	US	2019-06-30	"It's an awesome place for having fun and needs to stay open for the public."
Amber Roden	Colorado Springs, CO	2019-06-30	"The beach brings our community together. It creates a place of safety and where we can all unite in a world of fighting and disagreement."
Chris Overzet	US	2019-06-30	"I've been going to Pismo since 86 and now got my family into it . Love it down there."
leslie johnson	san jose, CA	2019-06-30	"We need this place to have r fun without anyone getting hurt"
Terry Toner	Medford, OR	2019-06-30	"Piblic land is just that."
Jon Wentzell	Stockton, CA	2019-06-30	"We need more ohv and beach camping."
Jasmin Lopez	Bakersfield, US	2019-06-30	"I love the dunes!"
Jordan Fergison	Wake Forest, NC	2019-06-30	"Riding keeps teens off the streets. Gives people a hobby that keeps them out of trouble and brings families together."
Kimberly Lackey Thomas	US	2019-06-30	"I'm in favor of keeping the dunes open to Riding"
JOSHUA RAMOS	Watsonville, CA	2019-06-30	"Josh Ramos"
Deborah Najm	Orange, CA	2019-06-30	"We love being able to use the dunes. Closure is not access. The unique experience that Pismo offers should not taken away from the citizens."

Name	Location	Date	Comment
Don Pardew	long beach, CA	2019-06-30	"We need this freedom , we all need this to have fun in a safe way and for the future riders ."
Shelby Eichelbaugh	Cameron park, CA	2019-06-30	"Shelby Eichelbaugh"
Jenni Massman	Sparks, NV	2019-06-30	"I grew up camping and riding out at Pismo! My family and our friends had a tradition of camping out and riding over the thanksgiving weekend. It is still one of my fond childhood memories. Don't take the opportunity to do that with my child away."
William Taylor	Tulare, CA	2019-06-30	"Because although it may be a dangerous recreation there are fewer and fewer places available for such activities people go into these places knowing they are taking risk. Let's not police all the fun out of life."
jeri vigil	Modesto, CA	2019-06-30	"this needs to stay open so that these people have something to do instead of ending up on the streets on drugs in things like that given what they need to be able to be an outdoor still"
andrea irwin	ssf, CA	2019-06-30	"This is a great family place. May years spent here."
Ashlee Garner	Modesto, CA	2019-06-30	"I'm signing because I love the Dunes, it's the best off road place to be."
Nick Silva	Galt, CA	2019-06-30	"Environmentalists suck"
Timothy Granger	Edwards, CA	2019-06-30	"Pismo needs to be open"
Sarah huff	Mendocino, CA	2019-06-30	"Keep our SVRAs open so people have a legal place to ride. Closing Oceano Dunes will do nothing to alleviate the problems!"
Ashley Long	Visalia, CA	2019-06-30	"The dunes are an awesome place to go with friends and family to camp and plan. Don't let the Libs and dumbasses ruin this!!"
Billie Williams	Santa Maria, CA	2019-06-30	"Great recreation for family's to ride on the dunes just needs more training for out of towners not using safety pre caution"
Laura Hoover	Hemet, CA	2019-06-30	"The Oceano Dunes should be kept open for all to recreate and enjoy. I've been several times and we have taken our kids there and other family members that were visiting from out of state. Closing the dunes will have a huge negative impact to the local economy. Keep the Dunes open!!"
Ron Chaffee	Vallejo, CA	2019-06-30	"Public rights"
Ryan Gibson	San Jose, CA	2019-06-30	"Because it's right!"
Dan Huffman	Oroville, CA	2019-06-30	"My family loves going to oceano dunes. ohv riding,campfires, playing in the surf all in one place."
Edith Medina	Chula Vista, CA	2019-06-30	"Public Rights!"
Reyna Lomeli	Riverside, US	2019-06-30	"Reyna Lomeli"

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Indy Alba	Azusa, US	2019-06-30	"Public rights"
Yolanda Morrow	Cerritos, US	2019-06-30	"The Dunes are a important part of California fun in the dunes creates memories.!!!"
Kim Vanmorkhoven	Santa Maria, US	2019-06-30	"Please sign to save the dunes! We grew up on these dunes and let's save it for our kids and their families!"
Diego Vigil	US	2019-06-30	"We All Ride"
Tori M	Grover Beac, CA	2019-06-30	"We need this recreational area."
Chris Hulme	Santa Barbara, US	2019-06-30	"Don't close the dunes. Come on. The family memories and fun are priceless out there."
Toni Kephart	Victorville, CA	2019-06-30	"Can't ride anywhere anymore. Even big bear trails are closed off. Or you will get a ticket because the cops are waiting for you."
Allison Waite	Santa Maria, US	2019-06-30	"It's fun to camp and have bon fires there."
Kathy Kiewlich	El Cajon, CA	2019-06-30	"I'm signing because we enjoy our time out on the trails."
Kimberly Haskell	Los Gatos, CA	2019-06-30	"We love our time on Dunes every labor day"
Whitney Zuercher	Clovis, CA	2019-06-30	"This is something for families to do together. I never got the chance to enjoy this place as a child, but I would love my child to grow up riding quads. A lot of people do not have access to places to ride without the dunes. Also, the revenue this brings the area would greatly impact the people on the community and would eliminate jobs."
Joaquin Barragan	Central Point, US	2019-06-30	"I used to live in Paso Robles and the dunes are an awesome place for people to get out and enjoy"
Garrett O'Brien	Dewey, OK	2019-06-30	"Because I used to live in California and grew up in the dunes."
Ashley Holbert	US	2019-06-30	"I grew up on Pismo Beach riding quads and enjoying beach camping, dont kill family traditions."
Nathaniel Barlow	Bryce, UT	2019-06-30	" "
Kathy Gong	Tulare, CA	2019-06-30	"For the first time ever in 2018, my husband and I rented a dune buggy in Oceano, and had the time of our lives!! We loved the thrill of driving without restrictions through the beautiful dunes. Please don't take this luxury from the community. Keep those dunes open for all to enjoy!"
Matt Lake	Kalispell, MT	2019-06-30	"I'm signing to protect a hobby loved by many. Taking public land away from the public means more riding in illegal areas. The restrictions are already excessive. Closure is not management."
Ryan Enslow	Rowland Heights, CA	2019-06-30	"Not right to close all the OHV areas we pay our green sticker money and what is the state doing with the money????"

Name	Location	Date	Comment
Tonya Hunstock	Spanaway, WA	2019-06-30	"We need places for families to have fun!"
Janay Ruiz	Santa Maria, CA	2019-06-30	"I agree"
Jessica Juarez	Cool, US	2019-06-30	"I grew up going to pismo its somewhere I enjoy taking my kids."
James Dorman	US	2019-06-30	"Love going here with friends and family. Only place like this in the world. Don't let it dissappear."
Edgar Lopez	Salida, US	2019-06-30	"Love going to Pismo good trips with friends and family!!"
Maria ZARAZUA	Commerce City, US	2019-06-30	"For my son"
thomas soto	Clovis, CA	2019-06-30	"Thomas Soto"
Matthew Cervantes	Pomona, CA	2019-06-30	"5 miles of the 840 mile coastline is not a devastating impact on the environment. The impact of 1 square mile in the city is worse than oceano dunes hvo can put out."
Rachel Catania	US	2019-06-30	"The dunes are lit"
Jorge Carlo Silva	Downey, CA	2019-06-30	"California traditions need to be maintained."
Anthony Pinon	Beaverton, OR	2019-06-30	"Anthony Pinon"
Monique Mcguire	Fresno, US	2019-06-30	"Our family has so many memories and more to make therebest place to camp#"
Chase Ellis	Walcott, WY	2019-06-30	"Chase Ellis"
Gilda Isabel Wiberg	Lancaster, US	2019-06-30	"It is one of our favorite place."
lester gibson	Taft, CA	2019-06-30	"Lester Gibson"
Carri VonRueden-Sabatucci	Lancaster, CA	2019-06-30	"The dunes are a state park for those that love the beach and our off road vehicles!! Do not take this breath taking park away from the people!!!! Listen to the voices of the people!!"
Aaron Treadaway	Placerville, CA	2019-06-30	"Because I enjoy going there"
Elizabeth Rickards	Fresno, US	2019-06-30	"I love the dunes, it's a family tradition to go every summer and ride razors and quads and stuff, even to just camp. Hope it doesn't get closed."
chris fecher	wichita, KS	2019-06-30	"its our land stop taking our rights"
Kai Kang	Hermosa Beach, CA	2019-06-30	"This place is rad and deserves to exist so my kids can enjoy it."
Jane Smith	Oxnard, US	2019-06-30	"This is a place everyone knows and loves, a place that has brought so many people together!"
Maria Schaab	Ventura, US	2019-06-30	"My friends love this place."

Name	Location	Date	Comment
Rebecca bell	Hanford, CA	2019-06-30	"My family enjoys going to the dunes"
Kimberly crabtree	Kingsburg, CA	2019-06-30	"I have been going for year it's such a great place to spend family time together"
Christopher Gudino	Porterville, CA	2019-06-30	"This is for my boy Aaron Smithy Guempel!!!"
Jason Jimenez	Tujunga, CA	2019-06-30	"Jason jimenez"
Heather Popejoy	Bakersfield, CA	2019-06-30	"I love going to the dunes with my family!"
Diana Franklin	Madera, CA	2019-06-30	"Love being able to park on the beach and unload have space for my family to enjoy. I believe ban the atv type vehicles and allow cars, trucks and campers stay."
Darren Pinson	Salinas, US	2019-06-30	"Love this place. I have been going there for years now."
Katia Vogt	San Francisco, CA	2019-06-30	"this is my favorite place to be, stop trying to take away my happy place"
tiffany luaces	Bakersfield, CA	2019-06-30	"Been coming here since I was a little baby. I now enjoy going with my kids. Keep it open. Maybe only allow so many Off roading vehicles at a time and make it camping only Dont shut it down all the way tho"
Debra Taliaferro	Turlock, CA	2019-06-30	"Debra Taliaferro"
Noah Calvin	Los Osos, CA	2019-06-30	"why take the fun away from peoples lives let them have fun its messed up to take peoples privileges away for what seems like no good and genuine reason"
Salvador Rojas	Burlingame, CA	2019-06-30	"I want to sign"
BOBBI HART	Modesto, CA	2019-06-30	"This for my cousin And his right."
Frank Gogol	Australia	2019-06-30	"Rode 4 wheelers at the dunes with my family, was an amazing way to experience the dunes, would be a shame if this was no longer available to families."
Maria Baker	Concord, CA	2019-06-30	"It's the only place for people to be able to enjoy them self and have fun"
Jandi Lanning	Sonora, US	2019-06-30	"My husband and I enjoy and look forward to coming here for weeks at a time! We make so many memories and friends out at the dunes. Let people keep those memories."
Jesse Walz	Boise, US	2019-06-30	"I love riding the sand dunes."
Donna Yates	La Pine, OR	2019-06-30	"We the tax payers, US citizens own state and Federal areas."
Darren Jessop	Tombstone, AZ	2019-06-30	"I like camping there."
jason hoiland	Waterford, CA	2019-06-30	"Keep the throttles twisted."

Name	Location	Date	Comment
Andy bloedel	Canby, OR	2019-06-30	"Keep all riding areas open!"
Dan Bergin	Newport Beach, CA	2019-06-30	"Everyone has the right to open space"
Doug Wilkerson	Modesto, CA	2019-06-30	"It's not just taking away a fun activity for families, it's about government pushing their agenda to close the park without science to back it up. Rich people moving in and trying to change it to their benefit."
Jeff hammonds	Murrieta, CA	2019-06-30	"We want our rights back"
Alex Kirkendalll	US	2019-06-30	"Riding needs to be expansive and not limited."
Gary Guercio	Santa Clarita, CA	2019-06-30	"This is a tremendously valuable recreation area for many tax paying families throughout California & beyond."
Eric Ramsey	Coalinga, CA	2019-06-30	"I love cruising the dunes and spending the night right on the beach"
John Clodfelter	Tehachapi, CA	2019-06-30	"I want the dunes to stay open for ohvs"
Jeff Terranova	Los Angeles, CA	2019-06-30	"These are our rights, and the state amendments state this information.We earned our rights, we will keep them."
Donovan Northcote	Nipomo, US	2019-06-30	"Revenue for families and businesses! And our unique niche that few get to experience"
Patricia Jefferson	Oceanside, CA	2019-06-30	"Keep Pismo open"
Nancie Hurley	Moyock, US	2019-06-30	"California is becoming nothing more than a democratic run hell hole"
Robin Larsen	Santa Barbara, CA	2019-06-30	"I'm signing!Robin Lsrsen"
Kevin Somsanouk	Westminster, US	2019-06-30	"Kevin somsanouk"
Alex House	US	2019-06-30	"I'm a ohv user and more access should be allowed for ohv use"
Kim Mueller	Clovis, CA	2019-06-30	"Oceano Dunes is my families home away from home, way before the wind barrier of eucalyptus trees were demolished from the hill where they built the homes. When you close our beach, all I can ask is how are you going to stop the wind? Tearing down the natural wind barrier of trees and the wind are the true problems."
beverly bartley	Bakersfield, CA	2019-06-30	"We need this park open it's the only recreational facility for motorcycles ,quads etc, family fundo not close this down . A lot of families come from miles around to enjoy the dunesto camp or to ride for the day .I have been coming since the 60's ."
Sonny Jarrell	Blachly, OR	2019-06-30	"I believe we need these areas!"
Brian White	Arroyo Grande, US	2019-06-30	"As a resident of Arroyo Grande Mesa for 30+ years The Oceano dunes are public lands and I will not allow you to shut down the dunes to OHV use as you pander to eco-warriors if you do any research you will clearly see the dust and air pollution you say is

Name	Location	Date	Comment
			caused by off road vehicles is a mute point due to the massive deforestation of the Mesa for financial gain! Every eucalyptus tree on the Mesa that has been cutdown was a part of the wind block on the AG/Nipomo Mesa I demand that you immediately start replanting coastal redwoods "so cant say they aren't native" along the border of the dunes and hey 1 to help mitigate the damage to life and property that is currently occurring. Sincerely A tax paying citizen that will not stand for threats from the uninformed"
Kris Sauquillo	San Diego, US	2019-06-30	"If anything, they should be reopening the hundreds of acres of land they already closed a few years ago based off of irrelevant facts."
cynthia Homen	Crows Landing, CA	2019-06-30	"The beach should stay open do all who has been going there for so many years! Please don't take close the beach! It belongs to the people!!"
Jennifer Harr	US	2019-06-30	"The dunes should stay open for rec and family use. It has been this way since I can remember. To also prevent riding in places they shouldn't be because they have no where."
Chrisjohn Morse	San Jose, US	2019-06-30	"One of the coolest places in Cali. Please don't get rid of it!"
jesse jones	Vancouver, WA	2019-06-30	"So many happy memories with froends and fsmily"
walter Locke	Scotts Valley, CA	2019-06-30	"Walter d locke"
Angelo Holguin	US	2019-06-30	"Angelo Holguin"
Victor Lachawicz	Sacramento, US	2019-06-30	"Keep California culture alive."
Nichalus Hindley	Atascadero, CA	2019-06-30	"Riding at the dunes is a staple of this town and yes it's always a riskbut who are we to tell people who want to have fun they can't we know what we're doing when we head out and we except responsibility of our own actions. Leave our right to the dunes and riding alone!!!!"
Robert Wisdom	Rosamond, US	2019-06-30	"Oceano Dunes is a great place! Closing it would be a terrible impact to the local commerce. There are always stupid people out there that will ruin it for the rest of us that act responsibly. Go after them and don't punish the majority because of a few idiots."
Josh Beaner	Anacortes, WA	2019-06-30	"We enjoy this opportunity."
James Quinn	Bakersfield, CA	2019-06-30	"Its not right, think about the peoples shops that will suffer,all of California needs to get a grip!"
Kirk Wilson	Tustin, CA	2019-06-30	"I'm against the restriction of access to public lands."
Vincent Lombardo	Lake Charles, US	2019-06-30	"This place has so many memories, and also some that have not been made yet, I plan on bringing my friends and family to this place. Don't shut it down!"
Tracey Hopkins	Sacramento, US	2019-06-30	"Tracey hopkins"

Name	Location	Date	Comment
Genoveva Reyna	Fresno, US	2019-06-30	"Why not"
Enrique Cabrera	Moreno Valley, CA	2019-06-30	"This is the last of it's kind in California."
Chris Gallegos	North Las Vegas, US	2019-06-30	"Save the dunes!"
Fredric Sobottka	Cave Creek, AZ	2019-06-30	"It's the only place like it and with this access. Let the people have this table scrap! They've taken away everything else."
Paul Lorton Jr	Menlo Park, CA	2019-06-30	"The costal commission has become waynout if control. They need to protect and foster use of our beautiful coast not close it off from the very folks who created them and fund the effort"
Dawn Zeek	Granada Hills, CA	2019-06-30	"There are fewer and fewer opportunities & places for families to spend quality time together. This place gives families the opportunity to enjoy many aspects of the great outdoors. Limited use is one thing, but a complete closure takes so much away from us and our future families. We need more outdoor activities our kids spend way too much time indoors playing games & spending time on their phones. Teach them by leading by example. Sharing, (the space next to your camp or a tow when someone else gets stuck, ocean life & respect. Thank you for your consideration."
Kyle Newberry	Morongo, US	2019-06-30	"These dunes have been here for years and never have created any problems go out in the desert and you see sand blowing all the time and you call that pollution. The people who are wanting to shut this down are wanting to sale it or put something else to make there profit and don't have anything better to do except ruin the fun for thousands and thousands of people and families who not only live here but even travel miles to come enjoy a place where you can ride in the sand and go hope in the water and go surfing even if we have to raise the price to keep it open and camp there are many people who are willing to pay"
Mark Miller	Portland, US	2019-06-30	"We need our ohv areas!"
Andrew Mesa	US	2019-06-30	"Pismo is our right"
Larry Tacker	Marina, CA	2019-06-30	"Kids need a place to go and have fun it will keep them out of gangs and drugs plus it's just good old fun to go ride"
Robert Hanson	Modjeska, CA	2019-06-30	"I support the recreational use of these areas using off road vehicles."
Randy Sikk	Patterson, CA	2019-06-30	"It belongs to all of us! It is a place where many memories were made! A place to enjoy nature and share time with family and friends!"
Mary Haley	US	2019-06-30	"I'm helping Cynthia Langer."
Stacie wenger	Scotts Valley, CA	2019-06-30	"Our family has enjoyed the dunes for many years. We have a disabled son who is able to ride along with me in our side by side . We have invested in this sport for him to enjoy. Please do not

Name	Location	Date	Comment
			take this away from our family and all other families who enjoy this awesome place"
Natalie Octa	US	2019-06-30	"We love creating memories there!"
Mat Ryker	Merced, CA	2019-06-30	"Dirtbikes and quads help alot of people,, UTVs are fun but too many people drunk drive them and clog the place with unnecessary danger"
Raenette Terry	Snelling, CA	2019-06-30	"This place is not just a place to go and ride bikes, quads etc, it's a place to came with friends and family make memories, my parents started taking me there when I was a baby I have taken my daughter there, i hope that one day she will take her children there, dont take out what little shore line California has left for people to enjoy and have fun at to make memories."
Richard Parker	Visalia, CA	2019-06-30	"You meet the best people there"
David Bradford	Madera, CA	2019-06-30	"It's the right thing to do. Preserving a place for hard working people and families to have family fun together."
Michelle Villeneuve	Desert Hot Springs, CA	2019-06-30	"Michelle Hanks"
David Lange	Corona, CA	2019-06-30	"I have never had the chance to go ride at pismo"
Dylan Kacerek	Ventura, US	2019-06-30	"It is the last place in California where families can drive on to the beach and enjoy so many recreational activities. It needs to stay open to allow generations to still enjoy the park."
Lori Rojas	Santa Maria, CA	2019-06-30	"Lori Rojas"
Patrick Burke	Bakersfield, US	2019-06-30	"Love the dunes!"
Mike Resar	Agoura Hills, CA	2019-06-30	"It should remain as is."
Josh Piper	Turlock, CA	2019-06-30	"Closing the dunes would hurt the local economy."
Michael Crosby	Fairbanks, AK	2019-06-30	"Freedom"
Dawn Guthrie-Clark	Menifee, CA	2019-06-30	"I love to camp myself, and I don't think this campground should be taken away from people who love it"
Kandice Astamendi	Glendale, CA	2019-06-30	"It's a great family destination and we met lifelong friends at Pismo that I can't imagine it closing"
Caren Gage	Lakeside, CA	2019-06-30	"Caren Gage"
Eric Patterson	Simi Valley, CA	2019-06-30	"I love camping on the dunes! I want my boys to be able to enjoy it as well!"
Jesse Levalley	Barre, VT	2019-06-30	"I love to ride"
Scott Fisher	Orange, CA	2019-06-30	"It's the people's land and the government shouldn't take it away from the people."

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Steffany Morgan	Bakersfield, CA	2019-06-30	"We love the Pismo Dunes! Family vacation in the Dunes is a huge part of our lives!"
Ashley Elliott	Los Angeles, CA	2019-06-30	"Me and my family have been coming here for years. Love this place"
Matthew Busi	Provo, UT	2019-06-30	"Piano Beach is where some of my best memories were made. Love this place. State parks should stand up to this tomfoolery"
Daniel Choi	Ventura, CA	2019-06-30	"The land shouldn't be owned and controlled by a specific group and kept from others. The land belongs to all people and should be available to all to enjoy and make memories like they have been foing for generations."
Richard Amader	rocklin, CA	2019-06-30	"It is a multi generational tradition and needs to remain open!"
Matthew Manely	Seaside, CA	2019-06-30	"If they take away the dunes. The town will struggle"
Angelo Phillips	Burson, CA	2019-06-30	"Riding at Pismo Dunes is a family tradition. We go multiple times a year!!!"
Dixie Hubbard	Altus, OK	2019-06-30	"Because handicapped and disabled people need to be able to go to the beach!!"
Danielle Miller	Cambria, CA	2019-06-30	"I grew up here and rode at the dunes Monthly! It's our go to fun place and we love it!"
Tim Johnson	Nipomo, CA	2019-06-30	"Tim Johnson"
Judi Farr	Phoenix, AZ	2019-06-30	"We support Tim and what he is doing."
Kevin matteson	Auburn, CA	2019-06-30	"This insanity must be stopped! That is PUBLIC land that was set aside FOR OHV use. These elitists that try and force THEIR will upon others, must not be allowed to unilaterally take away the freedoms of others!"
Jessie Lira	Fresno, CA	2019-06-30	"Good luck!!"
Laura vazquez	Duarte, CA	2019-06-30	"Would love to make memories with my family"
Liz Connor	Oklahoma City, OK	2019-06-30	"The sand isn't going anywhere, you should know your surroundings before buying a house."
Carmen Chapman	Clovis, CA	2019-06-30	"This a place in which families make memories."
sandra lopez	Fillmore, CA	2019-06-30	"This is one of my favorite places to camp with my extended family it has something for all ages. We love having the beach on one side and the dunes on the other. This will hurt the towns local economy as well."
Erin Macias	Pacifica, CA	2019-06-30	"The CCC is overreaching. We need to balance public access with environmentalism. This is an established use for this area and should remain as such."

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Gordon Harford	Las Vegas, NV	2019-06-30	"We have a right to ride!"
Austin Wygant	Lancaster, CA	2019-06-30	"keep pismo open."
Ric Crane	Redwood City, CA	2019-06-30	"Got to stop the crazy liberals and their ideological clap trap."
Denise Needham	Hesperia, CA	2019-06-30	"I spent half my childhood there riding in those Dunes how sad to be taken away so I can't do the same with my children"
Christopher Boyle	US	2019-06-30	"Ive been camping & riding the dunes for over 20 years! Nothing should change!"
Russell Colby	US	2019-06-30	"Russell Colby"
Rob Abrams	salinas, CA	2019-06-30	"I'm signing because I don't want them to close pismo. The coastal commision has too much power and should be disbanded"
Stephanie Contereas-Tapetillo	Merced, CA	2019-06-30	"Me and my family have been going to the Dune for sometime now we have spent many vacations riding quads and having fun ."
David Baumgardner	Salem, OR	2019-06-30	"My family grew up playing at the dunes. The family time kept my children from get in trouble getting in trouble back home. We need more things things for our children to get away from the computer and outdoors."
William Beaury	Bakersfield, US	2019-06-30	"Keep it open but keep it clean"
Teresa Coon	Rutherford, CA	2019-06-30	"I love this beach, and my nephew learned to ride his quad on these sand dunes. It would be incredibly sad to have this awesome source of family fun disappear."
Douglas Schucker	Reedley, CA	2019-06-30	"It's been a long time place fore everyone to go and have fun and enjoying riding and camping in the beach for years"
Jeremy Hardisty	Silver City, NM	2019-06-30	"Ive had some great times out at the dunes!"
Stephanie Becker	Aurora, NE	2019-06-30	"It's a cause important to my cousin and I support family"
Brenden Selvig	Olympic Valley, CA	2019-06-30	"I'm signing because I grew up riding the dunes and it needs to stay open"
Skyler Deuel	Prescott Valley, AZ	2019-06-30	"Let everyone enjoy the ride"
Ismael Sapien	Corona, CA	2019-06-30	"I want to save the dunes."
Cheri Watters	Leicester, NV	2019-06-30	"I have been to Pismo Beach several times and it is a great experience to camp on the beach. It would be a shame to prevent future generations this experience."
Christina Abarzua	Las Vegas, US	2019-06-30	"Leave what we have all grew up around and stop messing up the beautiful and natural places as families we all love and want to continue passing on to more generations."
Dylan Trippe	Clovis, CA	2019-06-30	"Think of the lost revenue alone! 路�♂#"

Name	Location	Date	Comment
Karen Garinger	CORONA, CA	2019-06-30	"Having places for families to create memories is important."
Irene Youse	San Jacinto, CA	2019-06-30	"I don't do it but thousands of Other do and it good clean family fun."
Spencer Laney	Silver City, NM	2019-06-30	"Too much government control. I am an outdoorsman."
Angel Salazar	Santa Maria, CA	2019-06-30	"Always taking away our chance to have fun"
Greg Soderer	Phoenix, AZ	2019-06-30	"Greg Soderer#85m"
Rim Bo	Fresno, CA	2019-06-30	"We just wanna take our family's/friends out on a trip and enjoy ourselves"
Debra Fontaine	Porterville, CA	2019-06-30	"I love this beach and have alot of child and adult life time memory moments Please dont take our dunes Debra Fontaine"
Trish Simmons	Blanchard, OK	2019-06-30	"I am from that area and grew up on those dunes. Fun family experiences."
Bruce Melton	Santa Maria, CA	2019-06-30	"need to keep it open. Check the picnic tables where the OHV are not allowed."
Daniel Nuno	Salinas, CA	2019-06-30	" i've had a lot of good times there it's not fair for the future of our kids not to be able to enjoy that place keeped me out of a lot of trouble"
Debbie Smeltzer	Apple Valley, CA	2019-06-30	"I love the out doors and they are trying to take more and more away"
Stanley Young	Fresno, CA	2019-06-30	"Keep the Dune open! All of it! If you'd give folks more square miles to ride there will be less problems! The Dunes belong to us! And we want to ride them!"
Adina Grenfell	Porterville, CA	2019-06-30	"I live near the beach and feel these are great vacation spots for people with atv's and what not."
Adam Viescas	Valencia, CA	2019-06-30	"I love this place"
Eithan Maler	US	2019-06-30	"I enjoy traveling throughout the country and seeing all the different places it has to over. It's a shame that as time progresses more and more places close eventually making it where everywhere is restricted"
Benjamin Marshall	Hialeah, FL	2019-06-30	"We need to preserve area to do this sort of activity."
Aliya Smithson	Sacramento, CA	2019-06-30	"This means a lot to my childhood friend and he needs something to do in his free time."
Elizabeth reed	Greenfield, CA	2019-06-30	"Family fun"
Josh Fults	Sylmar, CA	2019-06-30	"This is one of the best camping ohv locations in ca! It is so unique, camping right on the sand! Sometimes i dont even ride or go into the dunesI go every year, and would love my 8month old son

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			to be able to experience the joy of this place! I dont know why the change by the commission, but im sure its a mistake."
jan mckee	nipomo, CA	2019-06-30	"Its nice to be able to camp by the ocean"
Monique Rubio	Santa Maria, CA	2019-06-30	"I've been going to this beach for YEARS! So many great memories. I want my children to be able to experience this with as as I did with my family growing up."
Jo Tipps	US	2019-06-30	"Love the Dunes !!!"
Lola Robles	Yucaipa, CA	2019-06-30	"We've been going there every year , I'd hate to see it close :("
Caryn Hightower	Chico, CA	2019-06-30	"My family spent many holidays on the dunes and is a valued tradition."
cheyenne anderson	Cottonwood, CA	2019-06-30	"Because in northern California they have shut down @ 80% of the camp grounds and accessibility to get to these beaches we pay taxes and such to have access to the beaches and god forbid you want to camp you have to have a reservation a year in advance"
Elizabeth Contreras	Whittier, CA	2019-06-30	"This place is our annual family outing for the last 10 years (at least!), and we look forward to it every year. I can't imagine what we would do without this place. Please keep it up!"
Ken Lipparelli	US	2019-06-30	"I love orv"
Adam Rohrbach	Bakersfield, CA	2019-06-30	"I love camping and using the dunes for off road adventures my family has been going for years and wish to continue"
Leta Leggitt	San Jose, CA	2019-06-30	"Californians should have access to our natural resources."
Michelle King	Long beach, CA	2019-06-30	"Leave space for the huge riding family. Just because of a few we shouldn't all be punished"
DEBRA CLOUD	Santa Maria, CA	2019-06-30	"Keep this open, it is a lot of fun and brings in a lot of business for the local communities."
Griselda Mauricio	Tracy, CA	2019-06-30	"I have had many beautiful experiences in pismo through out the years. It has become a yearly tradition to go camping and adventure in the dunes. Please take in to consideration all the signatures, this is just part of the people who will want to keep it open."
Julian Sy	Las Vegas, NV	2019-06-30	"A friend is in need for a good cause."
Lisa Burkart	Apple Valley, CA	2019-06-30	"We are losing more than just ground in this state!"
Darrin Mullins	US	2019-06-30	"For the love of camping"
Louis Cimo	Fairfield, CA	2019-06-30	"Keep Public Parks Open to the Public!!"
Susan Goodson	Riverside, CA	2019-06-30	"Susan Goodson"
Rhonda Hays	Yucaipa, CA	2019-06-30	"I really enjoy riding and camping out here"

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Michael Liebsch	Fresno, US	2019-06-30	"We must protect the OHV parks in California. We have created alot of great memories."
Michael Oransky	Los Angeles, CA	2019-06-30	"California needs places to play"
Aaron Miller	Los Angeles, CA	2019-06-30	"i love riding in theses areas."
Pao Nissen	Carmichael, CA	2019-06-30	"This is where my family comes together every year from all over the place, its where a lot of familes come together, its been like this for years to come. Dont let some idiots ruin ut for the ones who enjoy this family fun place. We go there knowing the risks."
Danielle Hunter	Santa Barbara, CA	2019-06-30	"Access to riding and parks like this keep kids out of trouble"
Melodie benson	La Verne, CA	2019-06-30	"We want to keep our off road facilities open for our children and grandchildren to enjoy."
Susie Beard	US	2019-06-30	"I love the dunes! Favorite place in California!"
travis harris	Corcoran, CA	2019-06-30	"I have my brothers back"
Drew Nelson	Oakland, CA	2019-06-30	"I believe in responsible off-road vehicle stewardship and I think most people do as well."
kenneth evans	Sonoma, CA	2019-06-30	"It's the right thing to do"
Claire Vorhis	Monrovia, CA	2019-06-30	"I want all the folks who enjoy this area to keep enjoying it."
Adelena Avalos-Moody	Guadalupe, CA	2019-06-30	"I enjoy responsible dune driving, many great memories. I'm concern for the loss of revenue to our local business & to central coast communities."
Julie 808 367-3930	Honolulu, US	2019-06-30	"�"PROUD TO SUPPORT ANYTHING NATURE""
Bunny Riley	Salinas, CA	2019-06-30	"Good people need nice areas for recreation. Keep this area accessible."
Hovsep Najjarian	Torrance, US	2019-06-30	"GETIT"
Mitchell Comer	Dos Palos, CA	2019-06-30	"It's time that WE THE PEOPLE OF CALIFORNIA stand up against nonsense like this. For far to long privileged, liberal minded, and narrow minded individuals try to ruin this great state. This is our land, not the CCC's land. It's about time we the people in this state stand up against cronie liberals wanting to take and fuck everything up."
Denise wachs	Mesa, US	2019-06-30	"I'm an outdoor enthusiast"
Shawn Reed	Volcano, CA	2019-06-30	"I love camping at pismo nothing like family time doing what we love on the beach"
Eric Neubauer	Harmony Grove, CA	2019-06-30	"If the state want to take away OHV areas then they need to open areas currently closed to OHV. That was the deal when the green

Name	Location	Date	Comment
			sticker program was built. All of our OHV parks were 'written off', environmentally knowing that everywhere else would be protected."
Linda Eslinger	Rancho Santa Margarita, CA	2019-06-30	"Because my son and his family ride out there. Need a safe flight lace for off road riders."
John Burkett	Sacramento, CA	2019-07-01	"John Burkett"
Helton Tiffany	Riverbank, CA	2019-07-01	"I love the outdoors."
Cody Redmann	San Bernardino, US	2019-07-01	"Reason I signed Because the beach is amazing and the dunes just make it better and if people complain they complain that's just the way of life and if they shut down the dunes then most people won't even go out there so please sign up for it"
shari briseno	fremont, CA	2019-07-01	"I love taking my elderly grandmother on drives on the beach, it's the only way she can get down there."
Tammie Chadwick	Modesto, CA	2019-07-01	"The local economy would be devastated by this closure"
Eric Price	Corona, CA	2019-07-01	"Eric Price"
Kevin Gross	Charlotte, MI	2019-07-01	"I enjoy using the country's land, in a responsible way, that I pay a lot of taxes for."
Ricardo Arias	US	2019-07-01	"It's not right to close down our recreational area which will result in harm to our local economy."
Don Kibbles	Key Largo, FL	2019-07-01	"I believe this is important!"
Tiffany Jones	Jacksonville, TX	2019-07-01	"It gives family something fun to do."
DeAnn Knowles	Walnut Creek, CA	2019-07-01	"I am a dune rider as well. All our family spend quality time on the dunes each year."
Daniel Hoskins	Canyon Country, CA	2019-07-01	"It is good family fun."
Charisse Ochoa	Hayward, CA	2019-07-01	"Our family loves the dunes! We are 100% against the closure."
Kelsey Wollert	San Jose, CA	2019-07-01	"I love going riding with the family every year there and have so many memories. Please don't close"
Alex Hall	Prineville, US	2019-07-01	"Dirt bikes"
Linda Stevens	clovis, CA	2019-07-01	"I have enjoyed camping on the beach/dunes for many years. We always eat out at least once during our stay and shop locally when there. I will miss those great places to eat and shop if we can't use the dunes anymore."
nicole foreman	Vallejo, CA	2019-07-01	"We have been going here for years such a fun place for our whole family this would be very sad to see it closed for fun activities a d to keep our youth off the streets and getting into trouble. Keep the dunes open!!"

Name	Location	Date	Comment
Yolanda Origel	Modesto, CA	2019-07-01	"It's a beautiful get away. Like to show my kids 1 day 🛭 #"
Patti Greenlee	Greeley, CO	2019-07-01	"We nees to keep the dunes open"
Cindy Van Hoose	Yuba City, CA	2019-07-01	"My family and I ride as well. We don't want to lose the right to ride along with any other family or individual. We are getting limited as it is."
bonnie witten	lancaster, CA	2019-07-01	"Camping is fun, never take it away"
Bill Diekmann	Hollister, CA	2019-07-01	"I'm signing because we need to maintain activities like this to raise healthy well rounded kids"
Barbara Begin	US	2019-07-01	"Barbara Begin"
Christina Romero	Montebello, CA	2019-07-01	"There is very little, if any, space in California that is public lands and available to families such as Oceano Dunes. Our family, and many others, have been visiting and enjoying this natural environment for years. Safety issues can be addressed in other ways without shutting down the entire operation that will impact the local economy beyond repair."
Samantha Mamaril	San Jose, CA	2019-07-01	"The family loves this place"
Barry Hendersen	Needles, CA	2019-07-01	"It's our Land."
Yvette Montero	Bakersfield, CA	2019-07-01	"We visit the Dunes with friends and family. We have fun there and spend quality, relaxing fun time there."
Kody Randall	San Jose, US	2019-07-01	"Please no!!"
Kevin Fifield	Las Vegas, NV	2019-07-01	"Im signing because as a camper and rider i have the rights to use these public lands"
Lori pelucca	Modesto, CA	2019-07-01	"Because the State Parks of California are FOR THE PEOPLE of California!"
linda cox	Parker, AZ	2019-07-01	"It needs to be apart of California"
Robert Del Rosario	San Diego, CA	2019-07-01	"Rob d"
Israel Mudder	US	2019-07-01	"We need to keep our areas to ride."
Kyle Spencer	Santa Maria, US	2019-07-01	"When they talk about air quality going down. Remember that the air quality was just fine before they took down the forest of eucalyptus trees and put in a housing development and golf course right behind the Dunes."
Justin Martin Del Campo	Tracy, CA	2019-07-01	"I feel my grandkids should be able to enjoy as well as the past generations! No need to close it!"
Jon Doinguez	Oakland, US	2019-07-01	"I was born and raised in in SLO County. The dunes have been part of my 60 years here. Don't take that away from us please !!"

Name	Location	Date	Comment
Angie Ackerson	Marysville, CA	2019-07-01	"Angie Ackerson"
Karen Spaulding	Sacramento, US	2019-07-01	"Karen Spaulding"
Laurence Garvin	Medford, OR	2019-07-01	"I always have liked riding here"
Jennifer Bedford	US	2019-07-01	"I am signing because this is a true vacation that everyone can afford. Not all upper class people should only be able to experience the beach and a family trip. Don't take that away."
Shannon Fitzgerald	Tulare, CA	2019-07-01	"Shannon Leonardo Fitzgerald my family has been going to Oceano Dunes for many many years. It's a great and wonderful place for friends and families to get together the camp and hang out and go riding and have a great and wonderful time."
Kimberly Hunt	Springville, CA	2019-07-01	"We love this place. It's a wonderful place to camp. I've been going there for 45 yearsIt's the people's beach. Only place like it. U can't take it away"
Zachary Vierra	Sacramento, US	2019-07-01	"I want my family and the generations that follow to be allowed to enjoy it as I did growing up."
Justin Martin Del Campo Jr.	US	2019-07-01	"I have had countless memories here. This place has brought me and my family closer.I've created friends that are now considered family."
Michelle Martin	San Diego, US	2019-07-01	"Michelle Martin"
Jeremy Heiner	Lancaster, CA	2019-07-01	"Been riding these sand dunes since I was a kid, no reason to continue to take away our freedoms."
Jacqueline Lima	Gardnerville, NV	2019-07-01	"I grew up riding here and I still travel a long ways to continue to ride. Dont take tradition away."
Krisys Paradise	Bethel Island, CA	2019-07-01	"I'm signing because I want people to have places to ride."
Andrew Stinnett	Gig Harbor, US	2019-07-01	"What's this really about? I'm sure it's a land grab. Money to be made on beach front properties. California was always a Mecca for riding. Now it seems they want to push the fun out. That or charge us a whole lot of money to do so. Have to make sure you have the right sticker for that time of year, proper pipe and restricters. Plus many more I'm sure. But watch, more lucrative to build hotels and water parks."
David Ziegler	Escondido, CA	2019-07-01	"I'm signing to support keeping this treasure open for outdoor off-road recreation as had been done for many years. We need better public education and availability for this valuable resource. Not closure!"
jason balcena	oxnard, CA	2019-07-01	"Riding is in my blood"
Big Daddy Hernandez	Tulare, US	2019-07-01	"I'm signing this because I love laughing at the ppl who roll their shit and get hurt I'm the guy that says " haha dumbass" while pointing my finger at my bud Manuel llamas and saying "he said it!""

Name	Location	Date	Comment
Chris Mahoney	Richland, WA	2019-07-01	"America"
Chad guthrie	Gooding, ID	2019-07-01	"Motor sports like this bring a lot of revenue you the local business."
Lee Asimont	Modesto, CA	2019-07-01	" ORV parks should be maintained so those who want to can do so."
Rory Ashwood	Riverside, US	2019-07-01	"Rory Ashwood"
Travis Schrenk	Declo, ID	2019-07-01	"I am signing because we all need places to ride OHV's and this is a place for us. We don't want or need any more closures of these so called public lands and public riding areas . Leave it alone or we will vote you out."
Nancy Walsworth	Santa Margarita, CA	2019-07-01	"It's a recreation area for everyone"
Sandra Reis	Visalia, CA	2019-07-01	"I'm signing because me and my family have been coming here for years and would love to keep going and making good memories it brings people together!"
Shannon Talbot	Pomona, CA	2019-07-01	"Its important"
Ivonne Colin	Los Angeles, US	2019-07-01	"It is a great place to share with our family and make memorable memories we have gone there a few times and we had a blast cant believe this is happening �"
Laura Smith	US	2019-07-01	"Because they have a right to go enjoy wat they love to do who are u to take that away from people"
Clayton Grissom	Sacramento, US	2019-07-01	"•"
Marisol Marquez	Brentwood, US	2019-07-01	"There is not many places like the dunes! It's a way to spend time with your family at the beach, atv riding and even camping all in one! We come to the dunes all the way from the Bay Area simply because it's always a good time to go ATV riding."
Herminio Robles	Rialto, US	2019-07-01	"Camping releases stress and the environment is a peaceful and safe place to relax and enjoy ourselves."
Jesse Stone	Peoria, AZ	2019-07-01	"It's an awesome place to ride and one of the only beach dunes left to do ir."
Alex Garcia	93026, CA	2019-07-01	"I'm signing this because we all love to camp with our whole family & this can't be closed down."
Kelly Paonessa	Grover Beach, CA	2019-07-01	"If the recreational area of the dunes were to close this would displace hundreds of families, force businesses to close (both locally owned and corporate) and cause a lot of revenue loss for the entire south county."
Jamie Horner	US	2019-07-01	"It's an awesome place fun family time"
Wendy Bechtel	US	2019-07-01	"I was only weeks old in 1968 when my parents took me to Pismo and camped on the beach. I learned how to ride everything there. I fell in love there, and had my first beer there. In 1998 I Took my

Name	Location	Date	Comment
			daughter there when she was only 4 weeks old. Loved it. In 2009 after my 3rd round of chemo for BC. I went there to relax and be with family. I am Portuguese and we celebrate there every August. It is where we reunite, laugh, eat and enjoy. It is more than a beach it is heaven for a lot of us."
Karole Williams	San Jose, CA	2019-07-01	"Because it's the right thing to do. My family and friends go there every year. Sometimes several times a year. They always clean up after themselves."
Scott Counsell	Marina, CA	2019-07-01	"The dunes need to stay open!! California should be opening more places to ride, not shutting down the few places we have!!"
Lori Williams	Carmichael, US	2019-07-01	"I support keeping the Oceano Dunes open to vehicles"
Maureen Lannan	Santa Margarita, CA	2019-07-01	"This is so wrong, in so many ways. I do believe that all of you are aware of this. Environment ~ Animals ~ Pollution this is not your to damage! Leave it alone!!!!!!"
Yong Kim	Los Angeles, US	2019-07-01	"We have been going for 15 years and my children deserve to experience what the dunes have given us."
Lance Scott	Paso Robles, CA	2019-07-01	"This is something everyone should continue to enjoy."
Jason Harvey	Tucson, AZ	2019-07-01	"Jason Harvey"
Rowly Bettencourt	Atascadero, CA	2019-07-01	"People need a place to recreate with OHVs. It will kill Pismo Beach economically!"
Neil Thurman	Sparks, NV	2019-07-01	"Neil Thurman keep the dunes open."
Don Vochelli	Huntington Beach, CA	2019-07-01	"I love Pismo beach."
Greg Berger	Soda Springs, ID	2019-07-01	"One of the few places people can enjoy their off-road machines safely"
Brenda Tucker	US	2019-07-01	"It's my right"
Marda Phelan	Lodi, CA	2019-07-01	"Our family has been going to the dunes for many years. It's great to camp on the beach and ride on the dunes. This belongs to the people!"
Shirley Bumgarner	Wellington, NV	2019-07-01	"Another land grabfor implausible reasons that no one's buying"
Jennifer barocio	Los Angeles, CA	2019-07-01	"I love this place and have great memories here"
Jacob Gibbard	San Diego, CA	2019-07-01	"I want to be able to go to the same places my parents went, even if I didn't get to go with them. Organize & clean up what you have"
Gracir Gonzales	Lodi, US	2019-07-01	"It's our right to enjoy our stateWe pay for it"
Coila Crespin	Paso Robles, CA	2019-07-01	"Coila Crespin"
Doug Kamauff	Topeka, US	2019-07-01	"SAVE our riding area"

Name	Location	Date	Comment
Jacob Bermudez	Riverside, US	2019-07-01	"I love pismo!!"
John Jackson	Hanford, CA	2019-07-01	"It's situating we have hundreds upon hundreds of miles of protected coast and you want to take away a few miles that brings the local economy a couple hundred million dollars a year. This environmental excuse is a joke. Liberalism has gone way too far and this is a prime of example of liberal politics taking away from the people."
Jennifer Ellenbrook	Santa Maria, CA	2019-07-01	" Hanged needs made but closure isn't the answer."
Marissa Garza	King city, CA	2019-07-01	"We have rights��"
Melody Van Aken	Murrieta, CA	2019-07-01	"Love riding horses on the beach."
Skyanne Pressley	US	2019-07-01	"Skyanne Pressley"
savetta mann	torrance, CA	2019-07-01	"To keep Oceano Dunes SVRA open."
Rob Pelcher	Pismo Beach, US	2019-07-01	"The Oceano dunes is an awesome place for people to go ride and enjoy the beach and dunes in a unique way that can't be done anywhere else on the west coast. The Oceano dunes are just a very small piece of the coast set aside for riding and for families to have a good time out there, shutting it down is ridiculous and would not only end a very unique and special destination but it would also kill a huge source of local income. Bottom line is the oceano ohv area needs to stay open."
Brittni Enriquez	Taft, CA	2019-07-01	"This is a family thing to do go hang out enjoy the dunes and quads this will be sad if it closed one less thing for me and my family to enjoy and we love traveling to the coast the dunes is our fav place"
Joan Christopherson	Turlock, CA	2019-07-01	"I admire Gavin's ambition in promoting this cause."
Tyler Byron	Simi Valley, CA	2019-07-01	"TIME TO SHUT DOWN THE LIBERAL TREE HUGGERS BEFORE THEY TAKE EVERYTHING AWAY!YOU BETTER DO IT NOW BEFORE THEY TAKE AWAY YOUR RIGHT TO BREATHE!"
Erica Veilleux	Kingman, AZ	2019-07-01	"I support the right to enjoy the beach in your own way!"
Samantha bowman	Madera, CA	2019-07-01	"Why take something away that has been open to us all this time!"
Robert Perez	san antonio, TX	2019-07-01	"Cali needs to stop the discrimination against car and truck enthusiasts that occurs in california"
Andrew Kessel	Yuba City, CA	2019-07-01	"California politicians seem to want to regulate fun out if existence."
Chris Lowe	Ventura, CA	2019-07-01	"Conservation is important. I'd we don't curb this now, our coasts will look like Miami."
Robert Holcomb	Fort Campbell, KY	2019-07-01	"I was raised in the sand dunes in California."
Darren Behr	Prescott Valley, US	2019-07-01	"I have been going to pismo for over 20 years and would be absolutely devastated to not be able to share it with my kids. It's a wonderful place and a small piece of California coast line that

Name	Location	Date	Comment
			generates hundreds of millions in revenue for the area. It is not only wrong to shut it down, it would be down right foolish."
Richard White	Vacaville, CA	2019-07-01	"Keep the camp sites open"
Johnny Thomas	Honolulu, HI	2019-07-01	"Let the people live, laugh, love what we do. It keeps 1000s of people from going crazy and out of trouble. The people need this. Don't take away. It definitely have a negative impact."
kevin smith	moreno valley, CA	2019-07-01	"Support riders"
Gay Wilcox	St Thomas, U.S. Virgin Islands	2019-07-01	"The beach should be for everyone"
Richard Handy	Willow Creek, US	2019-07-01	"I need a place to ride"
Kelly Mason	San Francisco, CA	2019-07-01	"Kelly M Mason"
Randy Brunet	Vacaville, CA	2019-07-01	"Their badass"
Robert Jones	US	2019-07-01	"The dunes need to stay open for vehicles, camping and fun. The non-elected members of the coastal commission along with the elected socialist state officials of this once Great State need to shut the F-up and let Citizens live their lives."
Dan Collester	Los Angeles, CA	2019-07-01	"I am signing because I want others to enjoy the same things I did growing up"
Dana Miller	Madison, US	2019-07-01	"Signed"
Jesse Claxton	Collin, MO	2019-07-01	"Lived in Grover Beach most my life. Still have a house there. The economy will die without the beach access."
shawn Anderson	Los Angeles, CA	2019-07-01	"I love camping"
Robert Bircher	Tracy, CA	2019-07-01	"Oceano dunes is a great place for motorized play and my family loves it out there. We need to keep it open for our future generations to enjoy"
Rosemary O'Keefe	Elverta, CA	2019-07-01	"Rosemary OKeefe"
David Herman	San Francisco, CA	2019-07-01	"I ride!!"
Heather Dowdey	durant, OK	2019-07-01	"I love Pismo!"
Ethan Allen	Antioch, CA	2019-07-01	"Dunes should stay open"
Fredrik Thorell	Eagle, ID	2019-07-01	"Fredrik Thorell"
Tiffany pridanonda	Pomona, CA	2019-07-01	"dont close it, dont suck."
John Thayer	Brunswick, GA	2019-07-01	"Keep the dunes open"
Sherry Seales	Visalia, CA	2019-07-01	"I love to go camping and drive on the beach."

Name	Location	Date	Comment
Carmen Lopez	Santa maria, CA	2019-07-01	"We love taking kids to have fun"
Scott Collom	Lake Hughes, CA	2019-07-01	"We need to keep Pismo Dunes open for families to ride and enjoy that right to do so"
Ivanna Victorino	Paso Robles, CA	2019-07-01	"I am tired of seeing our rights taken away! People need a place to play and the beach should be for everyone including off-roaders!"
David Kuskie	Mission Viejo, CA	2019-07-01	"Great place for families and friends to get together for years. To spend family time together and build memories, healthy memories .Our Children and grandkids not sitting around playing on their phones and computers shut in side. But outside enjoying the beauty of our Parks with family together."
Denita Bazan	Merced, US	2019-07-01	"This has been a vacation spot for our family for years now. My babies are building wonderful memories just like I did. We don't want to see the dunes close:("
Douglas Nobles	Cypress, CA	2019-07-01	"Keep the dunes open!"
Pao Nissen	Carmichael, CA	2019-07-01	"This is a place of family traditions!!! Memeries being made, and where families from all over come together! Keep it open!"
Jay Roach	Temecula, CA	2019-07-01	"Jay Roach"
Jeffery Bays	Woodland, WA	2019-07-01	"This is an iconic rec area. Ridden there many time. Needs to stay open for generations to come."
Bonnie Hall	Bakersfield, US	2019-07-01	"My family has camped on the beach for over 50 years. It is a great family experience and stopping these family traditions would be a travesty!"
Shelly Cooley	Las Vegas, NV	2019-07-01	"Keep Pismo Beach/Oceano Dunes open for off road use."
Michael Stephenson	Norco, CA	2019-07-01	"Absurd, keep the dunes open. Many local businesses will also suffer!"
Dustin Nabors	Quail Valley, CA	2019-07-01	"We need more OHV areas for responsible riders and families."
ryan embler	Las Vegas, NV	2019-07-01	"This is very important to me and my community"
Fallon Pelzer	Anaheim, CA	2019-07-01	"We love camping an riding our razor as a family"
Ray Ba	Turlock, CA	2019-07-01	"Best times are at pismo beach! Family, camping, and riding side x sides, and walking the beach! Always look forward to my reserved dates!! ���"
Sandra Lyons	Kingman, US	2019-07-01	"He's my nephew and if he wants it to stay open then leave the damn thing open!"
Jeff Ames	Canoga Park, CA	2019-07-01	"I've been going to Oceano Dunes for my whole life (55 years) with my family and friends"

Name	Location	Date	Comment
Ed McGready	Santa Maria, CA	2019-07-01	"The wind has moved the sand forever and will happen whether there is off road use or not. Closure would be a huge loss to the local economy and to those who enjoy off road usage of the dunes."
Nicholas Christensen	Riverside, CA	2019-07-01	"We need to preserve the little riding areas we have."
Kaile Zelnik	San Bruno, CA	2019-07-01	"I love Pismo Dunes and love CJ"
ARNIE RABANO	Camarillo, CA	2019-07-01	"Have enjoyed and met the greatest people from all walks of life and different geographical areas camping and riding at Oceano Dunes for decades. It was bad enough to close a big part of the area due to the snowy plover. It would be a shame to deny people's love of beach camping and enjoying the dunes with their ATVs, UTVs, sand cars and trucks. If the state closes they have no idea of the fiscal impact it will put on the local businesses and we'll as local and state tax revenue and we all know California likes to tax the living daylights out of it's citizens."
Corinne Sayles	Henderson, NV	2019-07-01	"We need to keep this going."
Natalie SAnds	Murrieta, CA	2019-07-01	"Love pismo and riding with the family!!"
Jose morales	San Juan Capistrano, CA	2019-07-01	"we really need this thats part of are life please"
Mark Rubick	Citrus Heights, CA	2019-07-01	"I want to preserve Oceano Dunes State Park for the benefit of those who love to ride and enjoy the sand dunes, beach and ocean as much as I do."
Scott Carlson	Beavercreek, US	2019-07-01	"Need places to ride!"
Marlene Castillo	Lompoc, CA	2019-07-01	"Please sign this its a fun family place"
heather wallace	arroyo grande, CA	2019-07-01	"Stop taking away our recreation!"
Steve Loy	Tollhouse, US	2019-07-01	"Long time user,(44years) 3 generations! It's time to fight back like with the intention of sending a message to this curupt coastal commission! People in the Nipomo Mesa signed away their rights upon moving there! I would venture to say that their health problems they complain about, have more to do with past occupations and or lifestyles in their younger years! Seems the air quality isn't bad enough to stay off their golf course! We have water issues in this state and those sprinklers burn 80 gallons a minute, but that's our problem not theirs! Enough of the BS already!"
Stephanie OBrien	yermo, CA	2019-07-01	"Because we need to keep them open!"
Alejandra Ordonez	Fallbrook, CA	2019-07-01	"We love Pismo !"
Bruce Allison	Linton, IN	2019-07-01	"On board for preserving all parks."
Jeremy Wilson	Delano, CA	2019-07-01	"Public land for public use."
Edgar Vargas	US	2019-07-01	"I Love this dunes"

Name	Location	Date	Comment
Bryan Gardner	Gardendale, US	2019-07-01	"Love this place. Go there every year from Texas"
Anthony Mejia	Newark, US	2019-07-01	"Pismo is a place people go to enjoy riding it relives all the stresses people have from work. People also go to spend time with there love ones"
Karissa Duda	Mission Viejo, CA	2019-07-01	"I love camping and riding here! We usually go every year as a family!"
Shavanaux McArthur	Salt Lake City, UT	2019-07-01	"Keep them from taking more public lands!!!!"
Christy Dixon	Oxford, US	2019-07-01	"Friend goes there and it's important to them and family"
Bryan Myers	Placentia, CA	2019-07-01	"Save our Dunes save our rights."
Dale Grey	Newark, CA	2019-07-01	"I want to keep riding in the dunes like I have for over 30 years."
Jackie Sanchez	Yorba Linda, US	2019-07-01	"We love to camp and play here !"
Donna Hamza	San Luis Obispo, CA	2019-07-01	"DonnaHamza"
Wade Prince	US	2019-07-01	"I have enjoyed the dunes with my family and I think this would be drastic to close the dunes. Let our children enjoy the dunes forever"
Delilah Todd	Sand Springs, OK	2019-07-01	"To help out keeping OHV parks open for riders!!"
Angela Arbogast	Clackamas, OR	2019-07-01	"I support mark he is my freind and looks like fun needs to stay open"
Thomas Recio	Bakersfield, CA	2019-07-01	"It brings family closer and friendships alive"
Anita lopez	Tracy, CA	2019-07-01	"Keeping the dunes opens means a lot to the community!"
Shawn Bauders	Plumas lake, CA	2019-07-01	"Because we should all have somewhere to go"
Cyndi Culp	Arroyo Grande, CA	2019-07-01	"I've ridden horses there every year for the last de axe. The people who use the dunes respectfully request that it stay OpEN!"
Kelly Carr	Sheridan, CA	2019-07-01	"I'm showing support to Phoenixx"
Tymothy Bradsteen	Exeter, CA	2019-07-01	"These dunes are the reason me and my family have something fun to do yearly, if you close these dunes it's just another dumbass mistake you guys are making and Californians will never forgive the state for it."
scott theriault	Newport beach, CA	2019-07-02	"The local community will lose millions in revenue if this area is closed.!"
Thomas Monaco	Willow Spring, NC	2019-07-02	"I want to help"
Tara Sumner	Van vleck, TX	2019-07-02	"That is my home state and we have spent time in the OHV Park, making many memories with family and friends. They have already

Name	Location	Date	Comment
			set aside protected areas for wildlife which is awesome but keep a place for families and people to ride. There are enough restrictions."
James Whitaker	Hesperia, CA	2019-07-02	"The govt sucks"
Trent Ough	Prineville, US	2019-07-02	"These public lands should remain open for everyone's use not just select few!"
Renee White	Phoenix, AZ	2019-07-02	"this Community i grew up in depends on the 280 million dollars this beach produces. Put the eucalyptus trees back on halcyon Mesa, and move the birds. They will relocate as I'm sure they have already."
Randy Lenz	US	2019-07-02	"We all can use these areas and still keep things protected"
Hugo Lopez	South Gate, CA	2019-07-02	"This is such a unique landmark that has be made available for upcoming generations of campers, riders, etc. to enjoy"
kyle graham	Rochester, WA	2019-07-02	"Ohv people have rights to public land"
daniel fonseca	winchester, CA	2019-07-02	"Because people love everything about the city especially the dunes! I travel all the way from San Diego every August and spend a week at a time there. Locals will suffer financially!"
dylan logan	Bakersfield, CA	2019-07-02	"It will effect the local economy by closing the dunes, and also will prevent families from enjoying their California coast"
John Bunk	Camarillo, US	2019-07-02	"Although I can see protecting endangered species, closing Oceano goes way beyond that. Oceano, which is the only place I know in So CA where one can operate a motor vehicle on the beach, represents what, a small fraction 0.1% of the total square miles of beach in California? And what percentage of beach is already protected in California? Look at just south of Oceano and see just how many square miles of inaccessible beach is already protected. It's just drip drip drip eliminating one more place to ride off road in CA. The species have plenty of beach to live and are already protected, this is just flat out trying to eliminate off road motorized vehicles one park at a time."
Brian Corning	McKinleyville, CA	2019-07-02	"Because I love riding at the beaches."
Sara Kilgore	Fresno, CA	2019-07-02	"We love to go ATV riding at Oceano Dunes. This is our family time to creat great memories. We will be going on the Fourth of July to ride. Please don't take this fun times from us! Thank you!"
Oscar Vallejo	Simi Valley, CA	2019-07-02	"Outside recreation is important!!!"
Karen Cohen	Santa Cruz, CA	2019-07-02	"I want to protect the coast"
Braulio Cortes hernandez	Ontario, US	2019-07-02	"I'm signing because I love motorcycle and love riding by the beach"
Larry Califar	Altamonte Springs, FL	2019-07-02	"Trail riding is a lot of family fun, gets our children outside and a lot of us were raised to take more out of the woods than you bring in! Good clean fun!"

Name	Location	Date	Comment
Jacob Grisham	Austin, TX	2019-07-02	"I'm signing because I love those dunes"
Jay Sparks	US	2019-07-02	"Freedom and Pursuing Happiness"
corey coreyruston	Fallbrook, CA	2019-07-02	"Awesome spot to ride and camp with friends and family"
Oscar Gonzalez	San Gabriel, US	2019-07-02	"I signed because we are loosing all of our OHVA and if we keep on ignoring the government we are going to loose all our rights to anything. We are becoming another Communist country like CUBA where the "people" has no say. So lets keep it "we" the "people"!!! Not "we" the government"
Marvin De leon	Los Angeles, CA	2019-07-02	"Marvin de leon"
Justin Scarborough	Spring, TX	2019-07-02	"Been awhile since ive been but California takes enough away let them keep this kne."
Jason Jablonski	Clawson, MI	2019-07-02	"'MERICA"
Joe Lonjin	West Decatur, PA	2019-07-02	"I am signing this because I love recreational riding and camping. I got to visit the PISMO dunes about 10 years ago to ride atv's and loved it. It's honestly tiring that we have to keep fighting it's closure. Thousands of people enjoy them every year and riding is a great family recreation activity, the people have a right to this access."
Manuel De Leon	El Centro, CA	2019-07-02	"It's healthy for all ages!!"
Ada Marie Jensen	Las Vegas, NV	2019-07-02	"I support the cause that Audrey Flanagan supports."
Frank Reyes	Los Angeles, CA	2019-07-02	"Our family loves Oceano, and spends upward 2500.00 in a 4 day stay in town at local stores and restaurants. We would stop going if the beaches are closed to ohv."
Sandi Howard	Eagle, US	2019-07-02	"Kids need a fine place to ride"
Kim Tomlinson	Peoria, AZ	2019-07-02	"Family enjoys dunes!!"
Cody Anderson	Arroyo Grande, CA	2019-07-02	"This is a huge staple item of our community. The negative effects of loosing our recreational dunes would be immense to our economy."
Alexandra Claffey	Holly, MI	2019-07-02	"This is part of my summer ever year"
Phillip Cleveland	US	2019-07-02	"I'm tired of government deciding what we can and can't do"
Julie Adair	Fresno, CA	2019-07-02	"Because those assholes need to mind there own business."
Ottis Pack	Yuba City, CA	2019-07-02	"Hey California you already tax us to death. Leave out parks alone"
Logan Collette	Carlsbad, CA	2019-07-02	"I love pismo"
Justin Gillette	Bakersfield, US	2019-07-02	"Child hood memories"
Emmelina Urso	Las Vegas, US	2019-07-02	"This place is means alot to alot of familiesyes keep it open"

Name	Location	Date	Comment
Mark Reece	San Diego, CA	2019-07-02	"I would like to drive on the sand dunes"
Ryan Urbano	Spokane, WA	2019-07-02	"I grew up on the central coast and used to ride on the dunes"
Katherine Zupan	Merced, CA	2019-07-02	"Because our family and the friends and family of those we love have enjoyed spending recreational time at the dunes. It would be a horrible loss for so many not to be able to enjoy i it would be a horrible loss for so many not to be able to enjoy it. I believe there are enough intelligent and creative people involved to find a resolution to maintaining the ability for people to continue gathering and enjoying it. Save the dunes!"
nakni felihkatubbee	Riverside, CA	2019-07-02	"Just doing the right thing"
Jeff Duda	Mission Viejo, CA	2019-07-02	"My family has and wishing to continue enjoying Oceanos camping and riding. It is one of our favorite places that I would not want taken away from others as well as us."
Isaac Garza	Corcoran, CA	2019-07-02	"The dunes are a great place to go and have fun time with friends. It is an experience like no other and should be available to the coming generations."
Jordan Shugarts	Taft, US	2019-07-02	"I've gone to these Beaches in the Dunes, and Beach Houses from when I was a Child and even still. I know I would like to share more experiences with Friends, and Family Camping, and Riding the Oceano Dunes another time again, and so forth."
Javier Cortes	US	2019-07-02	"This is very unfair California is taking all the fun away from civilians just to make more money it's the that we take the power back the government of Cali only cares about money from the looks of it"
keith furst	Santa Rosa, CA	2019-07-02	"we need places to ride !"
Aracely Valenzuela	Santa Maria, CA	2019-07-02	"This is where I take my children camping!!! They love it there. It's always happy moments and good awesome memories. My mom would take me there when I was a child!"
Aaron Levisee	Irvine, CA	2019-07-02	"because dunes are my ducking life �"
Ryan Heather	Oceanside, US	2019-07-02	"Seems to me the 'enemy' closed down Pismo Beach a while back.  After doing so the sand was blown into the town and almost completely covered it due to there being no more vehicle tracks to fill in when the winds kicked up. How quickly people forget the benefits of having vehicles on the beach."
Chris Dixon	LAKE ELSINORE, CA	2019-07-02	"Lack of space for this sport"
Michael Heimbigner	Colville, WA	2019-07-02	"Keep this area open and open more area's as soon as possible"
Tanner Lowen	Mira loma, US	2019-07-02	"I've never had the chance to go and would like to get one to enjoy something you cant in the desert."
David Lemos	Windsor, CA	2019-07-02	"The beach should be able to be used by anyone who wants to drive on it and in the dunes, save family traditions and let people have their freedom"

Name	Location	Date	Comment
Rebecca Rodriquez	San Luis Obispo, US	2019-07-02	"Grew up riding these dunes, would be sad to know my kids won't have that ability one day"
Rebecca Rodriquez	San Luis Obispo, US	2019-07-02	"Also Mac miller rode these dunes. Don't let them die too."
Kyle Harris	Saint Helens, US	2019-07-02	"Plan on going in two months hope they don't shut down"
Adam Ardito	Visalia, US	2019-07-02	"Planning on going next month really hope it's open"
Alma Higareda	Porterville, CA	2019-07-02	"I hope they don't shut down :("
Colton Marmon	Vista, CA	2019-07-02	"Keep the dunes open!"
Donald Darling	Whittier, CA	2019-07-02	"It's the right thing to do!"
Keoni Corn	Bend, US	2019-07-02	"These dunes are a huge part of the community"
Del Dinauer	Morgan Hill, US	2019-07-02	"Fight to keep our Offroad areas open! This isn't just for locals, everyone uses the beach everyone needs to fight to keep it open!"
Sherri Smith	Arroyo Grande, CA	2019-07-02	"Because I want the beach to stay opened for fun on the beach Driving camping families and friends"
Thomas Humphrey	Clearlake, CA	2019-07-02	"The dunes belong to us and their are less and less places like this for us to use"
Cody Patton	Spokane, WA	2019-07-02	"We need to keep orv parks open!"
Mack Stevens	Fontana, US	2019-07-02	"I enjoy the camping"
Roger Rodriguez	Fresno, US	2019-07-02	"I strongly dislike the liberal agenda"
Shawlan Robbins	Utah	2019-07-02	"The places we have to ride now are getting smaller and smaller and the government just keeps wanting to make more and more places OHVs cannot go"
Garrett Richardson	Anchorage, AK	2019-07-02	"I'm signing because there are so few OHV areas around, it would be sad to see one more close, if you do close please open more! Do not take away our rights!"
Frankie villagomez	Sanger, CA	2019-07-02	"Im signing the petition to save what we have left. A lot has been taken from us Californians. The best beach in California, where we can ride free and camp with families. You taking away our beach or limiting us will fall onto stores and the community losing everything they have left. Leave the beach alone!"
Davey Mueller	Phoenix, AZ	2019-07-02	"I'm signing because, I love you Pismo. ##"
Ronan Collins	Fresno, CA	2019-07-02	"Tired of government overreaching"
Ryan Kuduk	Napa, US	2019-07-02	"When I lived in AZ I always went to glamis sand dunes and that place is a blast, haven't been to pismo yet but want to

Name	Location	Date	Comment
			eventually, would be a real bummer if it were to close down. #saveoceanodunes"
Mike Kleemeyer	Santa Paula, US	2019-07-02	"This will ruin every store near the beach and will never cause any good"
Mike Jones	Baldwin Park, CA	2019-07-02	"There amazing and should stay open for younger generations"
Jim Miller	Rohnert Park, CA	2019-07-02	"Because off roading is fun for the family"
Harlan Bell	Nipomo, CA	2019-07-02	"This beach has been a family tradition for over 50 yrs. Don't close this area that has been the memories of so many families from California and the entire country."
christian santoyo	queretaro, U.S. Outlying Islands	2019-07-02	"Because off-roading is fun for everyone!"
Andrew Nelson	Roseburg, US	2019-07-02	"We deserve a place to recreate"
Folkes Jake	Pasadena, US	2019-07-02	"This is everyone's happy place in this is complete bullshit"
Kevin Baldwin	US	2019-07-02	"Kevin C Baldwin"
Jose Canales	Hemet, US	2019-07-02	"Just bought a toy hauler with hopes of enjoying family time at Oceano dunes, need to keep open so that our kids can have many enjoyable memories"
Kevin Baldwin	US	2019-07-02	"Everybody needs a place to go burn off some steam and have fun"
Kumar Chengodam	Helendale, US	2019-07-02	"If pisbro closes, glamis, ocotillo, etc is all next. Time to make a change."
Derek Dahl	Norco, US	2019-07-02	"Corrupt California government trying to take away another OHV area. Isn't my \$2000 a year in green sticker tags and registrations suppose to help keep areas open and operating?"
Nicolas Paglia's	Burbank, US	2019-07-02	"Needs to stay open so that families can enjoy and make memories"
Aubrey Woods	Fresno, US	2019-07-02	"Take this and where do we ride and have fun? The streets?"
Adam Ybarra	Victorville, CA	2019-07-02	"This place needs to stay open."
Brandon Young	Fremont, US	2019-07-02	"Fight for our right to ride!!"
William Borba	Santa Barbara, US	2019-07-02	"Protect our parks!!!"
Kristin W	North Las Vegas, NV	2019-07-02	"I want to have the opportunity to go to these Dunes! Avid dumont goer as of now! Please don't shut it down"
Shawna Wiley	Arroyo Grande, CA	2019-07-02	"This was and always will be My Home! This so what makes this beach so special!"
Alexa Mendoza	Santa Barbara, CA	2019-07-02	"I've had so many good memories and this is where I rode my first quad! don't close the park!"

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Justin Barnes	Roseburg, US	2019-07-02	"No matter where you off road at this can happen, for that reason everyone should support this fight and do what you can."
Keoni Paul	Kamuela, HI	2019-07-02	"Let people enjoy things, duh"
Alfonso Noriega	Chandler, US	2019-07-02	"Do it Do It"
Cameron Vincent	Lake Forest, US	2019-07-02	"The only beach you can buck it on. So many people dream of taking their trucks here. What a shame people are trying to ruin the fun."
Damian Alvarez	Soledad, US	2019-07-02	"No mamen"
Sergio Soto	San Luis Obispo, CA	2019-07-02	"Bs they wanna close it off"
Chris Cheek	Bakersfield, US	2019-07-02	"I love OHV parks. We must make sure our future children get out of the dam house and having fun outside."
Andrew LeCain	Mountain View, CA	2019-07-02	"The growth of the SVRA program will continue to increase opportunities for recreation in an environmentally responsible way."
Jeremy Acosta	US	2019-07-02	"These dunes need to stay. It's a great place for people to come see and ride the beauty of California"
Franky tapia	Santa Maria, CA	2019-07-02	"Family"
Steven Sissenstein	La Quinta, US	2019-07-02	"Because freedom"
Jacob Kerswell	Fair Lawn, NJ	2019-07-02	"We are all human citizens and have a right to use the land we live on in ways we collectively want to."
Dave Wessels	Huntington Beach, US	2019-07-02	"�"
Glen Osborn	Turlock, CA	2019-07-02	"Glen Osborn"
John Sellen	US	2019-07-02	"The riders take better care than the state ever would."
Edward Schwander	Pomona, US	2019-07-02	"Some of my earliest memories are from camping at Pismo in the early 90s. Let's keep it available for other generations to enjoy just as responsibly as we did. Responsible camping on the beach / dunes and responsible OHV use is sustainable alongside preservation of the area!"
Daniel JumpJr	US	2019-07-02	"Daniel"
Michael Dipietro	Shelton, CT	2019-07-02	"The people trying to restrict the ohrv community are wrong it brings many people together from all walks of life"
Jerry Boepple	Oak Grove, MN	2019-07-02	"Jerry Boepple"
Kyle Blackburn	Covina, CA	2019-07-02	"This place with its job capabilities have been a landmark for families to go and have safe honest fun for so long . Shutting it down would be a true shame to make all the fun and first times a thing in the past . It's not causing any problems with wildlife or

Name	Location	Date	Comment
			corrosion . The ocean does all that by itself . Don't take the fun away from the future generations that want to go enjoy ."
Glenn Jr Trotter	Simi Valley, CA	2019-07-02	"Such a shame so many memories"
Michael Jay	Fort Wayne, IN	2019-07-02	"It's thousands of people's dream to come west and experience the dunes"
Roxanna Quirino	Sudbury, MA	2019-07-02	"We all need a place to play!"
Karl Abel	Kuna, ID	2019-07-02	"My brother believes in it"
Matt Young	Windsor, CA	2019-07-02	"americs"
Brian Epperson	Las Vegas, NV	2019-07-02	"Its important!"
Josh foster	Jonesboro, AR	2019-07-02	"Why would anyone want to shut down a state park? Does California and it's outrageous taxes not benefit from the money spent by campers and riders? If you close this park the amount of calls for illegal riding and trespassing will go through the roof. Sales will decline on motorcycles, atvs, and other dune related rigs which in turn means less money from taxes. Not real sure what your officials are trying to do out there, but please keep them the hell out of my state!"
Todd Holyoake	Hayward, CA	2019-07-02	"OHV areas are paid for by OHV users. Keep the dunes open!"
Kristoffer Konitzer	Ontario, US	2019-07-02	"Keep dunes open"
David Bongiovanni	Blackhawk, US	2019-07-02	"Keep our dunes open for responsible ohv use!"
Matt Hall	Placerville, US	2019-07-02	"Keep our last few places open. Costal commission is a greedy land grab organization. Lost a house at bodega due to these corrupt land grabbers."
Trevor Slawson	Modesto, CA	2019-07-02	"Keep public land public. It's not the governments land to decide to close or not. We pay for the land already in taxes and ohv fees."
Jordan Steele	Carmichael, US	2019-07-02	"Keep the dunes open!!"
John Baker	Alabama	2019-07-02	"I just makes sense."
Robert b	North Fork, CA	2019-07-02	"I have been using this beach since I was a young man. I go there with my children and their kids now."
Kurt Downey	Denver, CO	2019-07-02	"Recreational activities stimulate the economy and bring people together."
Matt Rusich	Tucson, AZ	2019-07-02	"This is the people's land for their recreational use!!"
Sam Burnham	US	2019-07-02	"I love camping and riding, and taking cate of parks for others to use, please keep the park open."
yvonne arteaga	Laguna Niguel, CA	2019-07-02	"I love to go camping there."

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Chris Wall	Glendale, US	2019-07-02	"Hopefully don't have to cancel my summer trip now!"
Maria Cortez	Rialto, CA	2019-07-02	"We go there every year for the last 14 years ago, and this makes me sad, help keep this going."
Kathi Wagner	Taft, US	2019-07-02	"Kathi Wagner"
Diane Combs	Los Angeles, CA	2019-07-02	"I want families to keep enjoying this beautiful beach, it has great memories for me."
Layla Cordwell	Pennsville, NJ	2019-07-02	" It should stay open and be open for the locals who use it responsibly. It is all those tourists who are ruining it for everyone else!"
Alex Keenhold	Easton, US	2019-07-02	"Keep them open!"
Rich Lezcano	Palo Alto, CA	2019-07-02	"This is the only place in 800 miles of coastline for us to play. The environmentalists are monopolists."
Sean Stallmeyer	El Sobrante, CA	2019-07-02	"The less legal riding areas we have means the more people will ride in areas that dont allow ohv vehicles."
Brent Van Eps	US	2019-07-02	"We love ATV riding at oceano dunes"
Carson Braga	Spreckels, CA	2019-07-02	"We need places to ride California!!!"
Paul McGrath	Escondido, CA	2019-07-02	"More government control!"
Walter Scruggs	US	2019-07-02	"Tired of seeing ecoterrorist take everything that we enjoy."
Robin Bush	Osceola Mills, PA	2019-07-02	"Robin Bush"
Jesus Baeza	La Jolla, US	2019-07-02	"I Love the Dunes, lets get more signatures."
Steve Usher	The Dezert, CA	2019-07-02	"Save Pismo OHV!!!!!!!!!"
Seth Ray	Castro Valley, CA	2019-07-02	"Land should be enjoyed by the public."
Matt Garcia	Fontana, CA	2019-07-02	"Save pismo"
Evan Johnson	Fennville, MI	2019-07-02	"Keep the beach open to us please and thank you."
Kenny Ledesma	Ventura, US	2019-07-02	"Leave it open"
Nic Lezcano	Walnut Creek, CA	2019-07-02	"This is a place for family's to be family's and riders to express themselves"
Rodney Agliam	Fort Lauderdale, US	2019-07-02	"It's a place to get away and have fun with family I have had a lot of family memories there"
Edward Spence	Atwater, CA	2019-07-02	"This is a California tradition."
Julian Swain	Calabasas, CA	2019-07-02	"There is very little dune area open for these activities in California."

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Terry Lovato	Oxnard, US	2019-07-02	"I grew up off-roading at Pismo with my family and now sharing this great experience with my kids. Make more rules on the beach to eliminate the idiots. I teach my kids the right way and the safe way to ride the dunes."
David Bacon	Sicklerville, NJ	2019-07-02	"I feel it's important for people to safely enjoy the dunes . Off road vehicles etc"
Michael Ricci	Camarillo, CA	2019-07-02	"This is a unique recrestional opportunity that exists nowhere else, while most of the rest of the coast is preserved for environmental reasons, leave this one small area for ohv recreation - that is fair and reasonable."
Cody Weaver	Splendora, TX	2019-07-02	"Planning a family trip from Texas out there next year. Don't want to see people loose there place to ride."
Jaime Burnap	Portland, OR	2019-07-02	"Motorized vehicles are part of what makes California, California.  Don't keep chasing them off"
Joseph Meagher	Santa Maria, CA	2019-07-02	" I'm signing this petition because the pismo dunes are part of our culture here. I also feel the closure of this will deeply impact our local economy , I wonder what the hidden agenda is."
Brian Christie	Fresno, CA	2019-07-02	"Government needs to quit infringing on our rights!"
Tommy Arms	Simi Valley, CA	2019-07-02	"Pismo needs to stay open it will destroy the town with no visitors"
Gary Alonso	US	2019-07-02	"We are Americans !"
Kellie Meyers	Fairfield, CA	2019-07-02	"We come here every year and enjoy being able to ride here. Along with several other people"
Blane Davis	London, US	2019-07-02	"It's a dream of mine to ride in Pismo."
PATRIC DAVIS	Oakland, CA	2019-07-02	"Keep the fines open."
Michael Bollinger	San Diego, CA	2019-07-02	"I am tired of more and more OHV land being closed and restricted!"
David whitlock	New Orleans, US	2019-07-02	"The comradery and community that offroading and ohv areas bring can't be replaced. People, like myself travel from all over the world to visit. I've met some of my best friends in the dirt. Wouldn't have it any other way."
James Coleman	Emeryville, CA	2019-07-02	"My family and I enjoy OHV areas! Especially the dunes! We are respectful and take out all of what we bring in and more."
Colin Cross	San Marcos, US	2019-07-02	"I am a responsible father of two with 3 green sticker motorcycles.It would be a shame to see more OHV land disappear. Legal places to ride are already few and far between. This taking will result in congestion of legal open lands which will increase safety concerns elsewhere.This only hurts responsible riders and families."
Colin Cross	San Marcos, US	2019-07-02	"I haven't been to Pismo, but have been to many other OHV areas in California. I believe there are plenty of rules in place. There is a lack

Name	Location	Date	Comment
			of enforcement of existing rules, and non-compliance from a few bad seeds."
Charles Patera	Covina, CA	2019-07-02	"The dunes have been a staple of Californian living for years. They should not be allowed to destroy the economy in that city because a few people don't like it."
Jonathan Hernandez	Oakland, US	2019-07-02	"I've been riding there since I was a little guy and people need to quit taking things that don't belong to them"
Carl Robinson	Mansfield, MA	2019-07-02	"This will only create a network of illegal riders that will attract the wrong kind of people and will cause the state to lose money as people will stop retesting the bikes. Take it from someone who lives in a state that has all but completely outlawed OHV this will not be good for anyone"
Andrew Johnson	Gettysburg, SD	2019-07-02	"I wanna protect our recreational areas"
Matt Bylund	San Jose, US	2019-07-02	"OHV users have rights too. Why are we the ones always having to compromise?"
Ruby Hernandez	Paso Robles, CA	2019-07-02	"There's no other place like Oceano Dunes !"
Sam Burton	Beirut, Lebanon	2019-07-02	"If you want to make an environmental difference then focus on cleaning the plastic out of the ocean! That hurts way more than rubber tires on a beach."
Evan Birdsall	Danville, CA	2019-07-02	"Because I've always wanted to camp and play on the dunes."
Morgan Whatley	Santa barbara, CA	2019-07-02	"I love the dunes please dont close them"
Mindy Kephart	Springfield, OR	2019-07-02	"We have used the dunes for years, most everyone is respectful of protected area. It's a family fun activity , that needs to be expanded not taken away ."
Susan Reeves	Grover Beach, CA	2019-07-02	"Our area small businesses will not survive without The dunes tourist location"
Antonio Navarro	US	2019-07-02	"To support the areas that bring happiness to others."
Hector Martinez	Tucson, AZ	2019-07-02	"The off road community actually helps to clean the areas."
Jahziel Elizondo	Fresno, US	2019-07-02	"Would be a sad thing to lose the dunes"
Emily Lopez	San Jose, US	2019-07-02	"I love our yearly trips to the dunes. Made some great memories and hope to make more with my young daughter."
Rafael Romero	California	2019-07-02	" I am signing this petition because the Oceana dunes is one of our biggest traditions in my family. Where we gather together as a community to enjoy our family and friends in amazing adventures that gives us a quick get away from our normal lives. More of a mind reset."

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Mackenzie Rai Marr	El Monte, CA	2019-07-02	"So many local businesses rely on the traffic from the dunes, especially summer and holiday weekends. So many businesses will shut down. So many local families will loose their livelihood."
Edwin Guzman	Los Angeles, CA	2019-07-02	"��"
Rob Johnson	Moses Lake, US	2019-07-02	"I think outdoors activities are important for families to enjoy together and with out motorized access people like me that had two disabled parents we couldn't have enjoyed the time spent together with off road vehicles and parks to use them in!"
Jake Harris	Mabelvale, US	2019-07-02	"This is important to my brother Jacob Harris so it's important to ya boy, Jake Harris"
Christina Peterson	Hayden, ID	2019-07-02	"The oceano dunes are a famous destination for tourists as well as locals!! You cannot take them away!"
Jeffrey Crosbie	Floresville, TX	2019-07-02	"Californian politicians have nothing better to do than take away the liberties of the law-abiding citizens. Don't give them an inch!"
Tom Baarstad	Chino Hills, CA	2019-07-02	"We need space to ride. They will just build high dollar apartments or condos.We have too many now. Preserve nature for our children before it is ALL lost!"
Tyler M	Santa Rosa, CA	2019-07-02	"Not down for new beach front apartments"
Noah Walton	Buena Park, CA	2019-07-02	"Pismo Beach can't close"
Hector Montelongo	Anaheim, US	2019-07-02	"We need this place!! The most bestest, entertaining dune place ever!"
Eddie Longshore	North Hills, CA	2019-07-02	"It is wrong to take away our recreation. Let us keep our small designated area."
Tracy Brown	Kingsburg, CA	2019-07-02	"I grew up playing on Oceano beach. It would be deviating to me and a lot of people. This is where we spend summers, anniversary, birthdays, or any time to just get away"
Nicole Campbell	Simi Valley, US	2019-07-02	"Favorite childhood spot. I have always wanted to go back but haven't gotten the chance yet. Please don't get rid one of the best places in Southern California. It is our home away from home for A LOT of people!"
Dave Hazak	Thousand Oaks, CA	2019-07-02	"I have spent many weekends there and had some of my best memories there!"
David Verduzco Sr	Mission Hills, CA	2019-07-02	"Then where would the offroaders be able to enjoy there weekends and holidays? The bars! House Party's? Let them enjoy what they love please leave the dunes and offroading open for them it's what God created just for Them. God bless you"
Lois Berkey	Escondido, CA	2019-07-02	"I tired of them taking away all our play areas. Usually because no money ( because they stole all of our Green Sticker fees that pays for this) or some small plant."

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Todd Woodward	South Lake Tahoe, CA	2019-07-02	"So top taking away recreation from people. Lots of people with disabilities use OHV's to recreate."
Ryan Kwak	Denver, CO	2019-07-02	"California law makers are terrible people that have ruined so many good things for that state. Please don't let this be another victim"
Corina Celaya	San Bernardino, CA	2019-07-02	"Without areas like these we can't teach kids and young adults there is better things to do then to be on the streets. Keep them active, family oriented, and teach them the responsibilities it takes to ride, take care of family and so much more."
Chris w	Sylmar, CA	2019-07-02	"Closing this beach would destroy small business in that area! You are potentially destroying small business and putting families out on the street by taking away their only source of income from the offroad community that visit those dunes!"
Cesar Castillo	13244 W telegraph Rd, US	2019-07-02	"I love to visit the dunes with my family."
Frank Alfino jr	Goleta, CA	2019-07-02	"Frank Alfino"
Rick Canuso	Newark, CA	2019-07-02	"Rick Canuso"
Kevin Moore	Orange, CA	2019-07-02	"Save the dunes for OHV!!!"
Christy Knop	Green Valley, CA	2019-07-02	"We need to stop closing recreational areas!!"
Lyle Coppinger	Bend, US	2019-07-02	"Save the ohv, there is enough beaches without ohv. Why do they need ALL of it. Stop the haters. They hate fun."
Christian Ewing	San Diego, CA	2019-07-02	"Keep closing off-road areas and making it harder for people to safely use their recreational vehicles. You're turning innocent people into criminals by closing the legal lands they can go play on. People don't just say "oh well" when things like this close."
Tyler Lord	Las Vegas, NV	2019-07-02	"Keep it open!"
Harrold navea	sacramento, CA	2019-07-02	"Life would not be the same without Oceano dunes"
Chris Clubb	Menifee, US	2019-07-02	"Areas like this are what built California. We can still protect our OHV areas without closing them and surrounding business down. People should not live their lives behind a phone or television. With more and more of our parks gets closed it is harder and harder for our outdoor enthusiasts like myself to find these amazing places. Save our OHV riding areas."
Matthew Carter	La mesa, CA	2019-07-02	"Been going here with my family since I was a little kid. There will be a lot of small businesses and families affected by this closure"
Kit Ribera	Rancho Cucamonga, CA	2019-07-02	"I want to keep the dunes open"
Matt Grossmann	Arlington, VA	2019-07-02	"Live on the east coast, heard about this place all the time"

Name	Location	Date	Comment
joseph mcclintock	San Diego, CA	2019-07-02	"Pismo will lose tons of business by closing the beach/dunes."
ISRAEL MArtinez	Hayward, CA	2019-07-02	"I believe it's important to have recreational areas for the whole family"
Nathan Taylor	Manama, Bahrain	2019-07-02	"I haven't gone here but I would want to one day!"
Jorge Miranda	Coachella, CA	2019-07-02	"Save the dunes"
Kyle Ferguson	South lake tahoe, US	2019-07-02	"I've come out a few times and it's an Awesome area to ride and it's one of the few places on the west coast to drive out and play on the beach"
Ryan Young	Eugene, US	2019-07-02	"Closing Oceano dunes will not have an impact to the environment. Stop taking away the rights of those to ride and support the local economy."
Isaac Gibson	Julian, US	2019-07-02	"Let's do this people. Once we lose it, we will never get it back!"
kim martin	Carlsbad, CA	2019-07-02	"My family has visited the dunes. Family time is needed in today's society. Unplugging and spending time with your family in nature is such a great respite to today's tech driven life. Closing the dunes makes camping and family time much less accessible. If the closure is due to rules being broken, enforce the rules. Don't punish all. Do your job and kick out the few that break rules and let the majority who follow them be able to stay in this beautiful park."
Alan Ocana	San Dimas, CA	2019-07-02	"Because the threats of closing is not ok instead work with us to keep the dunes under control."
Gregory Peterson	Bell, CA	2019-07-02	"I love the pismo beach dunes"
Aaron Driggers	Myrtle Beach, US	2019-07-02	"Closing land is not okay, working with everyone to keep things clean and In order is!"
Britt Schmal	Federal way, US	2019-07-02	"Never been to pismo dunes, but we face a similar opposition to our dunes in Oregon. Over the years more and more land has been closed. Anyone who enjoys riding in sand dunes would show their support for a place they have never been, because that's how important this sport is to everyone involved."
George Carrillo	Huntington Beach, US	2019-07-02	"CA again with its bullshit"
Richard Pruitt	Oakdale, CA	2019-07-02	"because California is over regulated and I'm tired of it!!!"
Robert Liles	Bullhead city, AZ	2019-07-02	"The sand dunes are a get away from the world, it's family and friends oriented period."
Martin Sharon	Redlands, CA	2019-07-02	"To save the dunes"
Jose Maldonado	Sylmar, US	2019-07-02	"Pismo ��"
Robert Imgrund	New Jersey	2019-07-02	"It's important to have legal places to enjoy Motorsports"

Name	Location	Date	Comment
A MORGAN	Las Vegas, US	2019-07-02	"Families need a place to go and be in nature."
Miranda Johnson	Cave Creek, US	2019-07-02	"Had a lot of great times there & I would like to do the same with my family as well"
Erich Schmidt	Springboro, OH	2019-07-02	"I find that closing ovr areas are are becoming a popular action due to the consistent non factual information that is provided to our government. If we keep closing there will be no place to ride. However it will not stop the people from riding on other land that is not approved causing a larger issue."
Chris McGee	Placentia, CA	2019-07-02	"So many great memories that our children will never have if we all don't fight."
Laurie Enriquez	Yorba Linda, US	2019-07-02	"This has been a family camping spot for many years and now that my husband has passed it holds a very special place in my heart. For the past 4 years we camp here to celebrate the passing of a special person who loved Pismo. Please keep it open."
Bear Scharbarth	Encinitas, CA	2019-07-02	"Because we need to keep areas like this open for recreational purposes and good family camping."
Steve Witherell	Pahrump, NV	2019-07-02	"I'm sure those involved in closing off the land have never been there, don't go camping and probably can't even tell us what OHV means."
Jason Leos	Lake Forest, CA	2019-07-02	"I love nature and hate government getting in the way of it ��"
Jonathan perrette	Bakersfield, CA	2019-07-02	"I want all my children and my family to be able tO enjoy riding on the beach just like I did growing up"
Zac Murray	Ventura, US	2019-07-02	"I want to keep going and hanging out with friends and camping and having a good time carving the dunes in our trucks!!"
Travis Jobe	Northridge, CA	2019-07-02	"Travis jobe"
Angel Arvizo	Chino, US	2019-07-02	"My family loves going to the dunes and camping. We have been going for years."
John Thatcher	Gypsum, US	2019-07-02	"Quit shutting down our public lands due to leftist politics being bought out by huge liberal agenda groups such as the Sierra club"
Corey Pratt	Grand Junction, CO	2019-07-02	"It is wrong that the government thinks they have the right to shut down public land. And I always notice it's pointed at the people that are into motorsports."
margie davison	visalia, CA	2019-07-02	"I go three times a year for the past 7 years my family and I have a lot of fun there I don't want to give that up it's a chance for my family to connect as a family"
Gabriel Salmon	Fort Riley, KS	2019-07-02	"I'm a soldier from orange country that goes on vacation 3 times a year with my wife and family. Taking this right away will force people to find unauthorized uses of Offroad vehicles and make the city and state lose a lot of money."

Name	Location	Date	Comment
Matthew Robles	La Puente, CA	2019-07-02	"Fuck it"
Michelle Greer	Riverside, CA	2019-07-02	"Amazing place for families"
Jose Maldonado	Chula vista, CA	2019-07-02	"This is my favorite spot to go and offroad when i come home from my duty station"
John Sniegowski	Alburnett, US	2019-07-02	"Stop cuffing our freedom!"
andrew sells	Santa rosa, CA	2019-07-02	"I've always wanted to visit!"
Jake Gogats	Mount Laurel, US	2019-07-02	"I want to take my 1985 FL350R there someday"
Gary Dunn	Bakersfield, US	2019-07-02	"Please stop taking our land! Pismo is the only place left you can drive a vehicle on the beach."
Ryan Aldridge	Sacramento, US	2019-07-02	"We have been going to pismo for years and I am voicing my opinion. In respect of our rights to camp and enjoy dunning in California my friends and family are very aware of our Environmental responsibilities when we are present. We do not want our rights to dune and camp taken away. Sincerely Ryan Aldridge."
cameron cook	Friant, CA	2019-07-02	"liberals ruin everything."
Breanna Hengtgen	Bakersfield, US	2019-07-02	"Love this place and all the memories it's created. I want the same memories for my kids and their future kids! Don't take this away!"
Maureen McLaughlin Miller	US	2019-07-02	"Maureen McLaughlin Miller"
Troy Wolf	San Diego, CA	2019-07-02	"Save for future generations , Us taxpayers deserve it"
Angel Contreras	La Habra, US	2019-07-02	"Only place in California you can ride on the beach and if you don't want us on bikes in the streets then open up the dunes #bikelife"
Brad Hitt	Menifee, US	2019-07-02	"Keep our lands open! Don't force economies to suffer. Let the people freely recreate. Fees are generated for the California Parks funds via camping fees and registration stickers. We don't need land closures, we need land openings. Everyone is entitled to a opportunity to use our public land regardless of how you choose to recreate. We all deserve a fair opportunity."
Sherlyn Fowler	Nipomo, US	2019-07-02	"Instead of closing how about starting a permit law with an education class that is required and patrol the dunes better"
Jessica Aguilar	San Jose, US	2019-07-02	"I've been going every summer for the past 3 years . So many great memories here would hate to see it closed down."
alex odegard	Del Mar, CA	2019-07-02	"all public land should be open for ohv activity"
Noah Ramirez	Hanford, CA	2019-07-02	"It's apart of where I grew up"

Name	Location	Date	Comment
jon jessey	Del Mar, CA	2019-07-02	"Keeping off-road areas open is an important part of using our land in proper ways and maintaining a community of active, relationship building activities"
Jeno Rayes	Lyons, CO	2019-07-02	"I care!"
Chad Robbins	Phoenix, US	2019-07-02	"Oceans and dunes"
Mitchell Carter	North Bend, WA	2019-07-02	"California is eroding the rights of the people, and it is bleeding into other states as well."
teri rumsey	redondo bch, CA	2019-07-02	"Taxes are paid by the citizens that ensure the access and cleanliness to these parks! People enjoy them, too much government these days taking away the pleasures of the public while still burdening them w taxes!"
BettyJo Carlson	Arroyo Grande, US	2019-07-02	"Great fun for friends and families. Keep it safe and sane, but let ppl have their memorable times out there."
stephanie cabral	orangevale, CA	2019-07-02	"For my buddy Gabe!!!!"
Valerie Hernandez	Sacramento, CA	2019-07-02	"My family and I love it here."
Karin Weiss	Lake Havasu City, AZ	2019-07-02	"Oceano, Pismo Beach, Pismo Dunes! We love it!!!!! Great family fun, good friends, camping. SAVE this place for FAMILIES!!"
Shelana Wilsey	Grand Junction, CO	2019-07-02	"I like to ride and have respect!"
Henry Macias	Salinas, CA	2019-07-02	"I take my family camping there multiple times a year and it gives us adults an our children a place to ride ,camp, and fish and make wonderful memories been going their since I was a kid"
Reece Pusl	Long Beach, CA	2019-07-02	"I have very fond childhood memories of riding here, and I do t want to see it go."
Frank Martinez	Escondido, CA	2019-07-02	"Why do us with the injustice of taking away what we love to do on the dunes? We have clean fun out there and create life long memories that family and friends will cherish forever. Why is it that everything that is good and clean is attempted to be taken away from us tax paying citizens. Keep the dunes alive and do it for the future generations to come."
Ernesto Rubalcava	Chino, CA	2019-07-02	"We love family camping at Pismo, and enjoy being able to go to the dunes."
Oscar Urbina	Los Angeles, US	2019-07-02	"Some of my families best times riding together at this place, I would like to someday do the same with my children."
Marcos Garcia	David, Panama	2019-07-02	"One, alone is not enough."
Donald Koch	Henderson, NV	2019-07-02	"We have been going there for years."
Govany Alvarado	Lemoore, US	2019-07-02	"Protect our land!!"

Name	Location	Date	Comment
Joseph Botelho	San Ramon, CA	2019-07-02	"I'm signing this petition to keep the park open. My family has been going there for years to enjoy the sand."
Devon Williams	Solvang, CA	2019-07-02	"I grew up having the joy and ability to experience Pismo beach. This is a locals safe haven for some. Tourism should not be The reason why is locals can't continue our family traditions and time spent together enjoying the beauty of our area!"
Olga Lakhno	Carmichael, CA	2019-07-02	"Igor lakhno"
Isaiah Garcia	Yuma, US	2019-07-02	"Freedom"
Rhett Steenburgh	Clovis, CA	2019-07-02	"Freedom"
Leann Hill	Fullerton, US	2019-07-02	"i love my auntie"
Blayze Webster	Santa Barbara, CA	2019-07-02	"Life"
Damon Granada	Livermore, US	2019-07-02	"Too many off-road parks, raceways etc, have already been closed in California. Not every kid grows up dreaming to be the next Lebron James, Tom Brady, dancer or chess champion. It's hard enough getting kids outdoors these days. If the state keeps closing these places where will we ride? Please accept the fact that Motorsport is just as important as any other sport. All the family bonding, friendships made and memories will all be lost. Please reconsider this decision. Sincerely, Damon Granada"
Jacob Hensley	San Carlos, CA	2019-07-02	"I have been going to Pismo Beach since I was a child and every time I go, it gives me the memories that I will tell my kids one day. Hopefully it will be open to the time of when I do have kids so I can being them to Pismo one day. Pismo Beach's problems can be dealt with in different ways than shutting it down."
Bonnie Burrows	Watsonville, US	2019-07-02	"Our family has been vacationing at the Oceano Dunes park since the 1970s. We raised our children to ride safely and responsibly, and now we bring our grandchildren to the park - Oceano is unique in that it offers activities for every family member."
El_Kelloggs Delgado	Rancho Cucamonga, US	2019-07-02	"Well hurry"
Robert Shannon	Groveland, US	2019-07-02	"Why"
tony santana	Los Angeles, US	2019-07-02	"Oceano ohv is one of the few places i can go to relax and energize myself for work again pluss its one oth the few places i wanna use my phone cause there is so much to do"
Arlene Delgado	Rialto, CA	2019-07-02	"�"
Robert Westler	Valley Center, CA	2019-07-02	"Stop with this nonsense"
Fernando Barron	Los Angeles, US	2019-07-02	"Save the grounds !!!!"
Marco mendez	Apple Valley, CA	2019-07-02	"This a way of life for a lot or tax payers it's our right to enjoy the shore as we wish"

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Travis Starr	Apple Valley, US	2019-07-02	"Because its our land"
James O	Cassopolis, MI	2019-07-02	"I live across the other side of the country we have a sand dune park in michigan if it were ever so close like this one it would be taking away alot of people's way of life that's so wrong to do and I dont agree with messing with people's lives"
Adam Schalow	Virginia Beach, VA	2019-07-02	"How can you take what already belongs to us?"
Craig Bortman	Encinitas, CA	2019-07-02	"Our responsible ohv user group deserves access to our public lands. It's time to reverse the trend of shutting down and limiting or access to our public lands."
Logan Palmer	Clovis, US	2019-07-02	"I love to ride and I feel if they take this away then it just really isn't putting people who love this hobby the right to ride"
Tanner Shipley	Bellingham, US	2019-07-02	"I don't want to see it close. It's great for the economy and it's a family fun place to go."
Jesus Sandoval	Chico, US	2019-07-02	"It's always been a family gathering location for our family."
John Sinacori	Simivalley, CA	2019-07-02	"Because they need to keep it goin"
Will Jester	San Francisco, US	2019-07-02	"I spend atleast \$1000 every time I go to pismo at the surrounding business to prepare for weekend there. I go 3 times a year so if you close it consider that money taking out the pockets of local businesses. By shutting down pismo you will kill the economy for the locals"
PITO GRANDE	San diego, US	2019-07-02	"ME MAMARO EL PITO EN ESOS DUNES NO LOS QUITEN"
Richard James	Murrieta, CA	2019-07-02	"I feel as part of the off road community for 50 years we are entitled to and pay for OHV areas through our taxes and registrations. We need to preserve the right to off road for our kids and grandkids"
steven smith	Aydlett, NC	2019-07-02	"Its a great area for family and friends to enjoy one another company."
steven smith	Aydlett, NC	2019-07-02	"its a great area for people to enjoy valuable time with family and friends making memories that will last a life time."
Andrew Whitehead	San Clemente, US	2019-07-02	"We live in the greatest country in the world, government officials need to do their jobs to manage and maintain our recreational land for OHV and others to enjoy, not just close gates and walk away."
Cristian Gonzalez	Desert Hot Springs, US	2019-07-02	"No Quema cuh"
Kelly Shelton	Duncanville, TX	2019-07-02	"Kelly Shelton"
Caitlyn Jobe	Bakersfield, CA	2019-07-02	"Because I love camping out there!"
Anthony Silva	San Antonio, TX	2019-07-02	"US Citizens should have the right to enjoy OUR outdoors."

Name	Location	Date	Comment
Moises Barragan	Redwood City, CA	2019-07-02	"Moises jr b"
Cole Henderson	Fremont, CA	2019-07-02	"Been my favorite place to ride and hang out since I was a kid."
Tyler Duran	Arroyo Grande, US	2019-07-02	"Puro oceano"
Robin Mckee	Whigham, GA	2019-07-02	"Im an advid ATV rider"
Justin Padgett	Maxvile, US	2019-07-02	"We need more riding spots but they are taking them away instead of giving us more"
Jashoa Rosado-Rodriguez	Tampa, FL	2019-07-02	"My boy Collin"
Thomas Nicholson	Fresno, CA	2019-07-02	"Save the dunes"
Bethany Dodds	Oxnard, CA	2019-07-02	"Growing up in Pismo Beach, I know how important the tourism brought by the dunes is for the local economy. There have always been accidents and terrible decisions made atthe dunes but current social media makes it seem more far reaching than it is. Perhaps adding a small day-use tax to pay for a specialized security/beach force to enforce the current laws which would lessen fatalities and serious injuries? It's better than closing it down!"
Josh Breilein	La Verne, US	2019-07-02	"We need places to ride. They are taking all our open land!!"
Graham Burgdorf	Hendersonville, TN	2019-07-02	"Keep the dunes"
Jacob Schultz	Cypress, US	2019-07-02	"This community loves this land more than anyone else ever could."
vivian ngo	fullerton, CA	2019-07-02	"Vivian Ngo"
connor whitesell	Bluffton, IN	2019-07-02	"Riding is a part of life"
Rafael Davila	Gonzales, US	2019-07-02	"We need more recreational areas not less �"
Jakob Martin	Oceanside, US	2019-07-02	"This is shit. We have the right to ride and drive where we have been going since we were kids"
sam williams	San Jose, CA	2019-07-02	"You can't keep taking away ohv land and enforce such strict laws on the highway. Cars/atvs are a passion for people and if you take that outlet away it will lead to more destruction of protected land and illegal enjoyment because there's no where to enjoy ourselves legally. Do you take dog parks away from dog owners because the dog shits on the lawn? No, because if you did they would shit on the streets. Get your shit together California."
Jordan Liesener	Albuquerque, US	2019-07-02	"Riding and exploring is an important part of so many peoples lives uve grown up riding there and plan on taking my two children to pismo also. We bring money to the area so much will be lost in tourism and economy all because you want to stop ohv riders from being in the area. Where should we ride now?"

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Zach Cummings	Boulder City, NV	2019-07-02	"Because taking away land just promotes more drug use and then illegal riding elsewhere"
Trenton Lyhane	Baldwin Park, CA	2019-07-02	"Should not take more areas fpr outdoor recreation away"
Nate Kroeger	Norfolk, NE	2019-07-02	"We lost our local area and now nobody has anywhere to ride that isn't 6 to 10 hours away. Was my favorite thing to do on the weekends"
John Ruda	Escondido, US	2019-07-02	"Always taking and never giving anything back to the public!"
Kristin Kubiak	Scottsdale, US	2019-07-02	"I've been visiting this recreational site since I was a kid! So many memories have been made here!"
Christy Milan	Anderson, CA	2019-07-02	"I love to ride and believe we need areas to enjoy with this activity too!"
steven wileman	Carlsbad, CA	2019-07-02	"This is BS! This is our land!!!!"
Chevelle Howerton	El Cajon, CA	2019-07-02	"Stop taking away our rights California."
Omar Gutierrez	Santa Maria, CA	2019-07-02	"We have a say in this!"
Zach Steele	Jurupa Valley, CA	2019-07-02	"First our guns laws go to shit and now our off-roading land is being taken away enough is enough from our liberal state! Riding and exploring promotes great family qualities, memories for kids and families they will remember for a lifetime, it promotes kids to create new things for the off road work and explore their creative side in building new projects."
Wardell Bennett	Houston, TX	2019-07-02	"Don't take more from us. Public land is for our use."
Kent Jackson	Las Vegas, NV	2019-07-02	"I like camping !"
Eric Martinez	Anaheim, US	2019-07-02	"We need to keep areas that allow residents to enjoy the natural resources"
Jim Roberts	US	2019-07-02	"We pay plenty of taxes to keep riding areas open."
Angelina Hernandez	Los Angeles, CA	2019-07-02	"Angelina Hernandez"
Amy Thomas	Marion, US	2019-07-02	"Spent some really good times with my family here. Don't know of any other place like it."
Kyle Kremis	Henderson, US	2019-07-02	"Been going here for years with the Family typical bs that California is trying to close something good for the family but has no problem raising taxes and doing other things that aren't good"
Matthew Willis	Hesperia, CA	2019-07-02	"I love it there it's a annual stop for us on our camping trip been going here as long as I can remember"
David Alvarado	Bakersfield, CA	2019-07-02	"Cuz i want to"
Deelorez Chiquillo	Tulare, CA	2019-07-02	"In signing because the Oceana dunes isn't just "a cool place", a lot of people see the dunes as a get away spot, to be free and go riding,

Name	Location	Date	Comment
			a place to clear the minds. I myself learned how to ride at the dunes if you take that away this would be so different and heartbreaking. Please reconsider your actions to close the dunes down."
Aaron Schuller	Chula Vista, CA	2019-07-02	"It's a lifestyle for some people, why not?"
Mario Apodaca	Indio, CA	2019-07-02	"Its a nice place to to go with family and friends and always has great weather"
Caren Groves	US	2019-07-02	"I want to keep the dunes open"
Doug Waxler	Los Angeles, CA	2019-07-02	"To reserve a special location for enthusiasts or outdoorsman to enjoy"
Gilbert Montoya	Oceano, US	2019-07-02	"Still taking our land. Stay woke people let's come together & fight back"
Steven Villalovos	Palm Springs, US	2019-07-02	"KEEP THE DUNES OPEN !!!"
Zachery McGill	Omaha, NE	2019-07-02	"I enjoy riding in the dunes"
Mark Escalera	Fresno, CA	2019-07-02	"Why not?"
Brittany Stephens	Sacramento, CA	2019-07-02	"Family vacations means family memories. My son and I shared our first experience here 2 years ago and we want to be able to continue to do so!"
Ricardo Navarro	Chula Vista, US	2019-07-02	"Keep the dunes open."
michelle Stevens	Anaheim, CA	2019-07-02	"Grew up coming here yearly as a kid. Tons if great memories"
Richard Cushman	Riverside, US	2019-07-02	"Keep the dunes open please."
Mason Marston	Rancho Cucamonga, CA	2019-07-02	"The don't like us having fun with our cars on the road yet they take away the places it's allowed smh"
Chad Krewson	Ramona, CA	2019-07-02	"To help keep the oceano dunes open!"
Brendan Labolle	Huntington Beach, US	2019-07-02	"Keep California's OHV's open for Family's to enjoy"
Philip Ramsour	Fremont, US	2019-07-02	"Oceano duns"
Inoke Fanaika	Union City, CA	2019-07-02	"I love camping on oceano dunes!"
Teri Ann Snedaker	Cambridge, ID	2019-07-02	"Our entire world is over regulated. The dunes have raised many many healthy active families. Let's keep this tradition alive.�"
Jason Lee	Claremont, CA	2019-07-02	"We need to keep these lands available for our use."
michael ervin	Citrus Heights, CA	2019-07-02	"nature is way more important than electronic media"
Garret Northcutt	Modesto, CA	2019-07-02	"This has been a family get together spot since before I was born"

Name	Location	Date	Comment
Manolo Rocha	Norwalk, US	2019-07-02	"Oceano dunes, a place where families make memories. Wonderful place where you have the best of both worlds, off-road the dunes or spend the day in the beach."
Blake Coffey	Oceano, US	2019-07-02	"Can't believe we'll be losing our backyard! Absolutely ridiculous."
Jeffrey Eyraud	Bakersfield, CA	2019-07-02	"I ride and enjoy the dunes and it brings a lot of revenue to the local community's"
Jason Luna	Santa maria, US	2019-07-02	"I ride and enjoy the dunes and it brings a lot of revenue to the local community's!"
Siobhan Mctiernan	Correctionville, IA	2019-07-02	"I would like to camp and go off-roading at Pismo Beach. This is one of the last few state parks and beaches over all that allow this kind of recreational activity. I would suggest making regulations or monitoring such recreational activities to fit the needs of why it is being suggested to close down. Having the beach open supports not only the state park system but also stimulates local economy. It also is a pull factor for community in off-roading and camping because the area is so fitting to the needs of this group. But Pismo Beach also has historical significance in that group and in the local community. Closing it down would be a shame, people will still be off roading, but wouldn't it be better to be collecting an income for the state park system off of the pull factor of this community being able to use this beach as well as stimulating the local economy because of that pull factor. There'll be fewer visitors to this area if the beach is closed down to off-roading. Monitoring or regulating could solve"
Jacob Hudson	Lake elsinore, CA	2019-07-02	"Please stay open!!"
Michael Adams	Sacramento, CA	2019-07-02	"It's our land that you are taking away from us. keep it open raise the cost x3 so not anyone and everyone can go any time any day. Also raising cost can pay for more patrol but also help pay to move the birds so we can have the land you already took away."
Nick Wurster	Citrus Heights, CA	2019-07-02	"This is something all generations need to have the opportunity to enjoy."
Johnathon Kenshalo	Fresno, CA	2019-07-02	"I've been going there all my life please don't close this place it's one of the last places to go and spend the night on the beach and have fun with your toys I've brought my quad and side by sides out there since I was little please leave this place open"
Jonathan Velez	US	2019-07-02	"My friend likes this place"
Mark Krepela	Elkhorn, US	2019-07-02	"I need to ride here someday so keep it open."
Michael Jimenez	Long Beach, CA	2019-07-02	"I love the dunes"
Dane Udelhofen	Los Angeles, CA	2019-07-02	"I love to ride"
Robert Frigerio	Chula Vista, CA	2019-07-02	"Can't let them take it away"

Name	Location	Date	Comment
kelli moore	Vallejo, CA	2019-07-02	"I'm under the impression the park will not be closed but rather amount of camping sites is to be reduced. Please do not close the park, or have this be a way to slowly close bit by bit. Thanks."
Haley Pierce	Mount Vernon, US	2019-07-02	"Keep it open!"
Josh Alm	Redlands, US	2019-07-02	"Keep it open!"
Matthew Whittome	San Jose, CA	2019-07-02	"I'm signing because I have been going to Pismo since I was a child and would be deeply saddened if it was closed"
Brayden Greftory	Lakeside, US	2019-07-02	"Too many times they've taken from us"
Kelly Strickland	Paradise, CA	2019-07-02	"Free space"
Alexis Wiley	Camarillo, CA	2019-07-02	"Free space !!!!!"
Cole Leseberg	Boulder City, NV	2019-07-02	"I go to these dunes every weekend almost"
Dusty Runion	Chula Vista, US	2019-07-02	"Ride on"
Doug Morrisroe	Waycross, US	2019-07-02	"Well managed and environmentally conscious sports enthusiasts and Californians deserve access to the dunes."
Pete Richmond	Tulare, US	2019-07-02	"Keep open for the youth to come and enjoy family fun."
Steve Consigny	Morgan Hill, CA	2019-07-02	"It is ridiculous to further limit this awesome place. It is 2 miles along the entire CA Coast, it is hurting no one and benefiting many!"
Carlos Martin Del Campo	Los Angeles, CA	2019-07-02	"This land is my land. This land is your land."
Bryce Ocain	Santa Monica, CA	2019-07-02	"Public land should be kept for public use. Government overreach"
Brooke Lima	San Francisco, US	2019-07-02	"My family loves to ride there and it's a shame to shit it down."
Renee Riley riley	US	2019-07-02	"I feel dunes should stay open. Do not let the few wrong people ruin it for us law abiding people"
Ramsey Benson	Auburn, US	2019-07-02	"Keep them public."
Bryan Beeson	Anaheim, CA	2019-07-02	"You are slowly eliminating every good place to ride"
Isaac Contreras	Los Angeles, CA	2019-07-02	"I'm signing because I love going to this place and I don't want it to close down."
Tracy Perry	Whittier, CA	2019-07-02	"I'm signing because I enjoy riding! It's a great way to keep kids off the street and out of trouble"
Greg Lind	Chino Hills, US	2019-07-02	"Whoever's idea this was, your moms a hoe!"
Binh Nguyen	San Jose, CA	2019-07-02	"For the people who are into 4x4 or prerunning, Oceano is our Disneyland. If you take this away from us, you are just as corrupted

Name	Location	Date	Comment
			as the government of California itself. You're taking away the little freedom that we have left when it comes to fun."
Rodrigo Torres	San Jose, US	2019-07-02	"����"
Jordan Cloud	Belmont, US	2019-07-02	"I guess they want us tearing up the streets in UTV and dirtbikes"
Devin Perini	Simi Valley, US	2019-07-02	"I am signing this because we go here almost yearly, if not to ride to handout and drive on the beach. The city benefits so greatly by having this attraction and giving kids in the area something to do and attracting tourist from all over to come and spend a weekend at the dunes."
Connor Knautz	Solon, US	2019-07-02	"Sand dunes are badass!"
shana mcgill	porterville, CA	2019-07-02	"Shana mcgill"
Jason Mazziotti	Los Angeles, US	2019-07-02	"Jason Mazziotti"
Ryan penhall	Laguna Niguel, CA	2019-07-02	"Stop stealing OUR land"
Cody Wahl	Fontana, CA	2019-07-02	"Keep it open for the off roaders! There's a million places for tourists on the beach this is the only one we have!"
Clay Tevelde	US	2019-07-02	"Since I was a little kid have gone to the dunes with my family and it is some of our greatest memories and I hope to be able to go with my children (if I have any) one day"
jim Gustin	Suisun City, CA	2019-07-02	"I'm signing because it needs to be open"
Pamela Cheney	Pinon Hills, CA	2019-07-02	"I want to ride forever!"
Brian Esquivel	California, US	2019-07-02	"It brought my coworks closer bonding experience"
Curtis Sances	Riverside, US	2019-07-02	"Too many fun memories with family riding would hate to not get to ride with my kids"
Brandon Gutierrez	Los Angeles, US	2019-07-02	"Bring back huckfest the right way!"
Michael Wren	Taft, US	2019-07-02	"We need to keep the dunes open.It is a great family outlet for riding and camping."
Melissa Cortes	Twin Falls, ID	2019-07-02	"I support 100%!"
Johnathan McDiffett	Santa Clarita, US	2019-07-02	"The Dunes have been a family trip since before i was born and we love it. I want my young kids to enjoy it when they get older as well."
Weston Barth	Los Osos, US	2019-07-02	"One of the last places in the nation of its kind"
David Blanchard	Santa Paula, CA	2019-07-02	"Because freedom!"
Austin Tapia	Peoria, AZ	2019-07-02	"I'm sighing because keep parks open"
jeremy Bossert	Inverness, US	2019-07-02	"I've never been but I want to one day. Hopefully this doesn't close."

Name	Location	Date	Comment
Zachary Leeper	Brea, CA	2019-07-02	"Of course California wants to tax us, create more rules and take away tax payers land."
Todd Wickstrom	Boise, ID	2019-07-02	"It is not their land to take and shut down PERIOD!"
River Hill	Springville, US	2019-07-02	"Great place to ride as it should be"
Gregory Ramos	Fresno, CA	2019-07-02	"I taught kids learned how to ride at Pismo. I am looking forward to teach my grandson also. Let's keep it open so future generations can also be taught."
Tommy Mcdevitt	Baypoint, US	2019-07-02	"Brrrraaaaaapppp"
Hannah Duarte	Trabuco Canyon, CA	2019-07-02	"i love visiting Oceano Dunes especially since i go to school in SLO"
Mary Rivas	Riverside, CA	2019-07-02	"My friend likes to ride"
Robert Swiers	Paradise, CA	2019-07-02	"Open land is balanced with non-OHV land. OHV accessible land provides more opportunities for folks, and what's left needs to REMAIN OPEN."
Emmanuel Avina	Anaheim, US	2019-07-02	"This is the only beach left to camp and ride in California. And it's not even about the riding but freedom to be able to jump on your bike and cruise around and enjoy the view. My family and friends have been camping in Oceano for years. My son has been camping at Oceano since he was in diapers and I want him to be able to enjoy the great locations that California has to offer. I'm sure we can find a beach to camp and ride in in Baja but why not keep the Californians in California? And keep the people happy."
Stephanie Stickel	Lancaster, CA	2019-07-02	"I love these dunes! so many good memories."
Orlando Gutierrez	Stevenson ranch, US	2019-07-02	"I hate to see business fall under."
Kevin Ryan	Vacaville, CA	2019-07-02	"Not enough places to ride OHVS"
Kobe Woodson	Valencia, CA	2019-07-02	"Family has been riding this place for generations. One of the biggest parts of California riding, shuttling it down would be a horrible decision. I plan on tearing the dunes up either way."
Michael Lee	Auburn, CA	2019-07-02	"There is no reason to close this place."
Lance Snowhite	Richland, WA	2019-07-02	"I love getting out doors in the dunes"
Julie Hampton	Rancho Santa Margarita, US	2019-07-02	"Julie Hampton"
cole mcclain	Menifee, CA	2019-07-02	"Closing our parks will only bring mischief. You cant take away things we love."

Name	Location	Date	Comment
Vincent Gionta	Tehachapi, CA	2019-07-02	"I moved to Morro Bay and I come to go riding there and have been there every year for over 10 years of my life and plan on continuing my trips there!"
Dillin Perini	Thousand oaks, CA	2019-07-02	"Fun place to ride and nice area to be in"
Dave Alonzo	Fresno, CA	2019-07-02	"My Family has been coming here for years"
Brian Damschen	Spreckels, CA	2019-07-02	"OHV users need sand to ride in. California has the rest of the coastline closed to OHV access, this is all we have left."
Trevor Halama	Nevada city, CA	2019-07-02	"I remember when I was a kid in the 90's riding quads here. Great place for kids to be outside instead of being on there phones. Hopefully it stays open!!"
Jordan Bernloehr	Lakeville, US	2019-07-02	"Wonderful place to be with family and friends. Please save our land and the community."
Cameron Bohn	O'Fallon, MO	2019-07-02	"These dunes are great for these riders to use. Better than them running in the streets."
Matt Doss	La Mesa, CA	2019-07-02	"I'm signing because I'm sick of California Government taking all of are land that we the people pay plenty of taxes for."
Robert Murphy	North Las Vegas, NV	2019-07-02	"I wanted to take my 250r here :("
Glenn Deacon II	Chula Vista, CA	2019-07-02	"I use the desert for family fun"
Trina Watson	Riverside, US	2019-07-02	"We come with the family every year! My daughter's learned how to ride here."
Mark Mathieu	Hawthorne, CA	2019-07-02	"Don't shut it down! So many memories!! The dunes are for us California people! Save The Dunes"
jason shiftar	Oak Creek, WI	2019-07-02	"I would like to use the dunes someday."
Scott Zindroski	Hurricane, US	2019-07-02	"CA residents and out of state off-road enthusiasts and families come to these dunes year after year bringing money to the local economy and enjoying this public land. Please don't allow this to stop."
Zach Coats	Fremont, US	2019-07-02	"It's a great family place."
Haley Stowe	Corona, CA	2019-07-02	"So many memories here for me and a lot of other people. Sad California wants to take yet another thing away."
Pamela Montelongo	Palmdale, CA	2019-07-02	"I'm signing because I want these dunes to remain open to the public."
Cj Holmes	Lemoore, US	2019-07-02	"If we lose the beach let's shred the streets! 1000's of quads and bikes down main revving to hell!! Power to the people!"

Name	Location	Date	Comment
Cj Holmes	Lemoore, US	2019-07-02	"It's more dangerous in the water then on the beach ask around sea if I'm lion"
McKenna Pettyjohn	Paso Robles, US	2019-07-02	"This is where I first learned how to walk this is where I first learned how to ride a dirt bike an also the first place I learned to drive . So many firsts here an I would like that for my kids one day ."
Neil Roessler	Carpinteria, CA	2019-07-02	"A great recreation area"
Christine Saffire	Thousand Oaks, CA	2019-07-02	"I love pismo!!!"
Jesse Mckee	Whitethorn, CA	2019-07-02	"Riding motorcycles and atv's is a healthy thing for the vast amount of youth, adults and anyone else that finds satisfaction from the lifestyle. Consider it an alternative to drugs and addiction or any other distructive things life can throw at ya"
Scott Kauffman	York, US	2019-07-02	"We are planning our vacation for next year and going to Pismo while we are in California"
Cameron Brock	San Luis Obispo, US	2019-07-02	"Fuck emissions"
Ziad Adaimy	Fontana, US	2019-07-02	"This is our beach people its not our right its our privilege lets treat it like our own or they will take it away from us >"
William Tetro	Tempe, AZ	2019-07-02	"I'd like my kids to have some of the same memories I did there when I was a kid. There arent too many beaches you can drive on anymore."
Gale Jensen	Gilroy, CA	2019-07-02	"We have been going to Pismo at least twice a year since 1973. The whole family enjoys it. Dont ruin our family reunions! There are going to be people who don't follow the rules or clean up. We have cleaned up other campsites after people have left a mess just to keep our park going. There is a lot of coastline . Dont take ours away!!!"
Michael Corbett	Los Angeles, US	2019-07-02	"I"
Antonio Montelongo	Bell, US	2019-07-02	"Because Pismo that's why Braaap"
Chadwick Witherspoon	Cheney, WA	2019-07-02	"I have strong histpry with the area and the activities that go on within it."
Jenee Chandler	Ojai, CA	2019-07-02	"I'm signing because I'm an active user of our OHV areas and you are taking everything away from us. Please leave our remaining recreation areas OPEN!"
Sage Clark	Valencia, CA	2019-07-02	"Ride on"
Evette Sallee	Riverside, CA	2019-07-02	"It's important to keep our OHV rights . We deserve these recreational areas, for all the taxes we pay and outrageous gas prices, dealing with the homeless population, we deserve a place to enjoy."
Justin Anderson	Crestline, CA	2019-07-02	"Keep our OVH land open!"

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David Welch	Riverside, US	2019-07-02	"Fuck the tree huggers"
Michael Stovall	Fresno, US	2019-07-02	"My livelihood depends on Oceana staying open. We are a franchise selling sxs, quads, jeeps and trucks. It will cut our business by at least 25%."
kalyn machado	Desert Hot Springs, CA	2019-07-02	"Jessie bind♥#"
Douglas Sorrell	Los Angeles, US	2019-07-02	"We pay taxes it's our land. Open it all back up"
Kirby Phillips	Santa Maria, CA	2019-07-02	"My father grew up riding these dunes, I grew up riding, and I want my kids to grow up riding here too, but they can't if these crybaby soy boy beta male libtards shut down the beach. If the beach gets shut down, so help me god I will find out who voted for full closure and I will chop off all your toes and sell them on the deep web, so Don't close the beach."
Manuel Niebla	Lynwood, US	2019-07-02	"Keep it open!"
Travis Hooker	Barrington, US	2019-07-02	"We need to keep recreation areas open to stimulate economy"
Ava Darata	Riverside, US	2019-07-02	"Stop stripppng is of our colic liberties."
Ava Darata	Riverside, US	2019-07-02	"Stop taking away our civil liberties with so many laws."
Ava Darata	Riverside, US	2019-07-02	"Stop taking away our civil liberties with your laws."
Jorge De Horta	Camarillo, US	2019-07-02	"Only place like it for miles. It's part of the community. Sad to see it slowly dissapearing."
Andres Garza	San Diego, US	2019-07-02	"Best beach place to drive your truck feel free"
Breal Rowe	Ventura, US	2019-07-02	"Have you ever seen anyone frowning on a quad, in the sand dunes? Me neither keep it open so the good, tax paying citizens of California can continue to enjoy themselves"
Tony McLaren	Portland, OR	2019-07-02	"I'm a taxpayer and do not want further restrictions"
Ryan Cary	Sun City, CA	2019-07-02	"People need somewhere they can take their families for fun"
Radley Rust	Ontario, US	2019-07-02	"I been going there since I was a kid. It's ridiculous that people want to take part of are childhood away. And what about my kids future. They will never grow up knowing Pismo Beach like I do KEEP IT OPEN!!!"
Brooke Parker	San Luis Obispo, CA	2019-07-02	"Let them ride"
Alex Kelsey	Fredericksburg, US	2019-07-02	"Don't restrict the people's freedom to enjoy the beauty nature has to offer."
Casey Hall	Weed, CA	2019-07-02	"I like fun"

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miguel fernandez	west covina, CA	2019-07-02	"Exciting family fun you will never forget, two generations enjoying Pismo"
Jacob Grant	Visalia, US	2019-07-02	"I agree!!! They see people dying out there all the time that's why"
Steve Kamienski	Corona, CA	2019-07-02	"They have taken enough land form the people!!"
robert scott	Grand Junction, CO	2019-07-02	"Our public lands need to stay open"
paul blaume	San Luis Obispo, CA	2019-07-02	"I believe all should have the right to play"
Benjamin Jen	La Palma, CA	2019-07-02	"Please maintain OHV and recreation areas"
Mason Chapman	Richland, WA	2019-07-02	"I've never been to Pismo but my family and friends enjoy the Oregon coastal dunes in the same way that I'm sure Pismo riders do. If someone tried to take my Oregon Dunes from me, there is very little that I wouldn't do to stop them."
Michael Faiella	Phoenix, US	2019-07-02	"Save Pismo! Planning on making a trip there in the future!"
Alex Picazo	Montclair, US	2019-07-02	"We need to keep pismo open. That's the dunning spot in the summer for me."
Adam Jusula	Phoenix, US	2019-07-02	"Maintain open ohv areas for us to enjoy!"
Emilio Camacho	US	2019-07-02	"I love oceans dunes. and will fight to keep for what I love!"
Brady Earley	lakeside, CA	2019-07-02	"The desert should be open to the public"
Nicholas Smith	Myrtle creek, US	2019-07-02	"I love the oregon dunes"
Jesse Andrade	Long Beach, CA	2019-07-02	"I still haven't gotten the chance to ride the Pismo Dunes!"
Mike Adams	San Diego, US	2019-07-02	"Want to take my kids a ride on the beach"
Jonathan Martinez	North hills, CA	2019-07-02	"Pismo is a great place to enjoy what earth has given us!"
Joe Miller	Apple Valley, CA	2019-07-02	"19,000 acres taken years ago and now they want the remaining 1,500 acres? Bull Shit!!"
Blake Tardiff	Lake Forest, US	2019-07-02	"It's somthing God created for people to enjoy so let us do that"
Justin Sanders	Medford, OR	2019-07-02	"OHV enthusiasts"
Carson Charbonneau	Ramona, CA	2019-07-02	"Braaaaap is why"
Luke Morales	Los angeles, CA	2019-07-02	"I go to Pismo every year and I'm fed up with the bureaucratic BS I pay taxes and I want to do whatever I want there"
Marcus Velarde	Indio, US	2019-07-02	"Been a local for years, this is something that brings the community together to hangout and have fun. Good family memories for everyone, please let's keep it open for everyone else to enjoy and experience it."

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Richard Wilkins	Phoenix, US	2019-07-02	"This place is excellent place to make family memories and make long term friends. While having a blast!!"
Lauri james	Lompoc, CA	2019-07-02	"Freedom to play"
Cameron Andre	Mission Viejo, CA	2019-07-02	"It's not right to take away the people's land. So many of us have a passion for riding, the few spots left to go legally need to stay open."
Ron Milano	US	2019-07-02	"We need it!"
Ronda Bunker	Twining, MI	2019-07-02	"It's time to stop taking away parks!"
Xavier GONZALEZ	Moreno Valley, US	2019-07-02	"#vivaHaveeGordon"
Jay Jackson	Saint Cloud, FL	2019-07-02	"OHV do more to keep areas clean than those that want to close access"
Cindy Purnell	Camarillo, CA	2019-07-02	"We need wide open spaces."
Jesica Edwards	Honolulu, HI	2019-07-02	"Jesica Edwards"
Manuel Garcia	Oceanside, CA	2019-07-02	"Because lots of people had the right and opportunity to ride it and it was fine and i want that same right"
Maria Preciado	Lemon Grove, CA	2019-07-02	"I love having safe places to ride and enjoy family time the family that plays together stays together!"
Devin DiBasilio	Rancho Cordova, US	2019-07-02	"Just another place taken away from the youth to keep them busy and off drugs"
Charlie Stewart	Henderson, NV	2019-07-02	"Because we are tired of the government land grabbers ."
Brian Navarra	San Jose, CA	2019-07-02	"Been riding here for 20 years, there are not any places like this anymore locally. Let's keep it open so generations to come can enjoy what I was able to growing up."
Scott Faulkner	San Carlos, US	2019-07-02	"2 reasons. 1) a GREAT cause. 2) and if Bobby says he needs me, I am there."
Richard Fluharty	Riverside, US	2019-07-02	"Just found out If they keep closing everyone will end up riding the streets"
Charles OConnor	Concord, CA	2019-07-02	"Keep it open."
nick martin	Milledgeville, GA	2019-07-02	"Keep it open"
Bernard Alexis	Selden, US	2019-07-02	"Keep it open"
Erik Kovacs	Murrieta, CA	2019-07-02	"Because you tree huggers and shitty Democrats that run this state are burning it to the ground"
Danny Vargas	Napa, US	2019-07-02	"It is a right to be able to have freedom and those sand dunes make me feel free"

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Robert Merriman	Castaic, US	2019-07-02	"It's good family fun so many families enjoy"
Ariana Milla	Fresno, US	2019-07-02	"Keep it OPEN"
Richard Allgood	Manteca, US	2019-07-02	"Fight for your right to ride."
Ryan Stolte	orange, CA	2019-07-02	"Hasn't California taken enough away from its citizens already? Gas tax for zero road progress over taxation to pay for illegal's, shall I go on?? Get Newscum and Pelosi OUT OF HERE!! all we want is a place to leave it all behind and enjoy what the working class people deserve!! THIS IS OUR SANCTUARY PLACE!!!! If illegals can have one why can legal citizens!!!"
Salli Cordova	El Sobrante, CA	2019-07-02	"People should be able to enjoy this"
Houston Lear	La Mesa, US	2019-07-02	"You can still respectfully use the land and conserve the land simultaneously!"
Chris Contreras	Hemet, US	2019-07-02	"Fckn Democrats"
Sabrina Mancebo	San Jose, US	2019-07-02	"Been coming here for my whole life. Such a beautiful place shouldn't be taken away!"
Chris Davis	Benicia, CA	2019-07-02	"I've been going to the dunes ever since I was a kid. I learned how to ride here and I always wanted to be able to take my kids to these fun dunes which are great for beginning riders"
Ben Mcdonel	Bakersfield, CA	2019-07-02	"This is going to kill local businesses around that area and take jobs away"
David Himes Jr	Aguanga, CA	2019-07-02	"Fun Police at it again"
Gabriela Ramirez	Nephi, UT	2019-07-02	"Its the right thing to do"
Erin Himmelrick	Pleasant Hill, CA	2019-07-02	"Damn fun Hitler's. Leave shit alone"
libertad ruiz	Hasbrouck Heights, NJ	2019-07-02	"because"
James Crapeticio	Corona, CA	2019-07-02	"California needs to stop taking away any and all avenues for fun. Soon it will be illegal to surf because sun screen damages coral reefs."
David DerMinasian	Taft, CA	2019-07-02	"Because its our way of recreational fun and thats what we always have done落"
Tony Tonso	Roseville, CA	2019-07-02	"I love oceano dunes and my family has been camping there for years."
Angelica Banaga	Calipatria, US	2019-07-02	"Family that Plays together Stays Together is my reason"
Thomas Reicher	Tustin, CA	2019-07-02	"Because the state keeps taking away all the places that people make memories with their children. No bikes, no skateboards, no skateparks, no dogs, no running, no climbing, no drones or RC toys,

Name	Location	Date	Comment
			and no sand rails and quads! No wonder kids are getting in so much trouble today."
Olivia Vigil	La Puente, US	2019-07-02	"Olivia vigil"
Jeremy Champion	Petaluma, CA	2019-07-02	"I love Pismo beach"
Jesus Silva	Clovis, US	2019-07-02	"This is where our children have memories and where they will make memories with their own kids. Just get a better system for check in and you'll see the difference. Need to fund some technology for check in and life at dunes will be great."
hayley guffey	Morro Bay, CA	2019-07-02	"This is our home our lives our memories and some of our livelihoods"
Annette Kallio Pargett	US	2019-07-02	"I love this place and have many fond memories."
Gina Michell	Huntington Beach, CA	2019-07-02	"This is such a great spot for families and adventure seekers. Many many fun memories here. You're putting local businesses and employees out of work and taking away a CA treasure!"
Ross Derrick	US	2019-07-02	"I am tired of the government taking more away from us."
Josh Ferency	Redding, CA	2019-07-02	"Stop taking our lands away from the people!"
Patricia Greene	Hockley, TX	2019-07-02	"I'm signing because it's the right thing to do and it's an awesome family outing"
May Guinaban	Singapore, Singapore	2019-07-02	"May Guinaban"
Evan Hartley	Escondido, CA	2019-07-02	"�"
Joshua Scott	Indianapolis, US	2019-07-02	"Our national lands need to be for everybody enjoyment."
Nick Harris	Long Beach, US	2019-07-02	"We need a place for families to ride and spend time together making memories."
Steven Bowden	Bakersfield, CA	2019-07-02	"This has been policy for years. Why are we changing it because new home owners are suddenly opposed. You knew what you were getting into when you bought property there"
Seth Grotts	Murrieta, US	2019-07-02	"Pismos the shit"
Michelle Spears	Bonsall, CA	2019-07-02	"I want to keep riding, take my boys. Show them its ok to have a good time and not have to worry about any closures."
Morgan Lazan	Riverside, US	2019-07-02	"There needs to be more places where kids can be kids"
Fareed Hayat	Baltimore, MD	2019-07-02	"I support. Back in my day I was one of those who dwelled at devil's dip. It was a safe space that gave the youth something fun to do.  These spaces are important and necessary."
David Sparling	Bakersfield, CA	2019-07-02	"its a family tradition to go riding out there, lets keep the tradition alive for lots of people and generations to come."

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Nathan Szukala	Yucaipa, US	2019-07-02	"We need to keep our land for the people who pay taxes to enjoy the land"
William Lutjemeier	Cedar Hklls, UT	2019-07-02	"Motorsport recreation is a big part of my family's and friend's lives. It's what we love and we love the areas we all ride in."
Luke Swenson	Brisbame, Australia	2019-07-02	"Was planning on flying from Australia to the USA to see this amazing place and more CA parks. The amount of tourism you will kill of you shut this park down will be crazy and hurt so many businesses"
Rosario Moya	Los Angeles, CA	2019-07-02	"Rosario Moya"
John Collins Collins	Lake Elsinore, CA	2019-07-02	" I'm signing this because we need to keep public open spaces open to the public!"
Terrance tisdale	Wichita, KS	2019-07-02	"Sign it"
Erik Coleman	Murrieta, US	2019-07-02	"Singed. ���"
Anthony Aldaco	Ontario, US	2019-07-02	"Because I wanna sign it"
Katelyn Johnson	Bakersfield, US	2019-07-02	"I'm signing because most childhood memories with my dad were spent here. We came almost every month and rode our ATVs together. My dad has been gone for 12 years and I would like to share this experience with my family as they get older In honor of my dad who always put his family first. This is where memories happen. Please sign to keep it open!"
Arlene Zamora	Moreno Valley, CA	2019-07-02	"Keep open"
Alex Gonzalez	Corona, CA	2019-07-02	"Because we the people need somewhere to have fun and spread positive vibes."
Roberto Cantu	Fresno, CA	2019-07-02	"I am tired of having my freedoms taken away slowly. If it isn't one thing it is another. Wakeup people!!"
Desirae Rivas	Visalia, CA	2019-07-02	"I have made so many memories their !!!!"
jorge Mendoza	Los Angeles, US	2019-07-02	"save pismo!!!"
Dr. Panik Hernandez	Santa Maria, US	2019-07-02	"Keep it ricky"
Rob Fernandez	Colorado Springs, US	2019-07-02	"I want this to stay open"
sean polione	Antioch, CA	2019-07-02	"Let's work to help maintain and preserve the dunes while enjoying them at the same time."
Louisa May	College Park, MD	2019-07-02	"Larry may"
Felix Hernandez	Los Angeles, US	2019-07-02	"Keep it open !!"
Jason Adams	Sheridan, CA	2019-07-02	"More restrictions, really? Leave pismo alone"

Name	Location	Date	Comment
Kelsey Spencer	Tempe, US	2019-07-02	"MORE PISMO"
jaime reeves	Council Bluffs, IA	2019-07-02	"I support the piano dunes"
Michael Osgood	Los Angeles, US	2019-07-02	"California politicians are out of fucking control!! They All need to go before it too late!!"
mark reich	stanton, CA	2019-07-02	"Keep pismo open"
Eric Silva	Bakersfield, CA	2019-07-02	"That place is awesome"
Jake Gallo	Orland, US	2019-07-02	"Keep oceano dunes open"
Ryan Vanario	Las Vegas, US	2019-07-02	"Want to enjoy pismo this summer"
Josh Parrish	La Mesa, CA	2019-07-02	"Public OHV areas are one of California's most appealing assets. It allows for families and friends to enjoy California's beautiful outdoors while enjoying vehicles constructed with many parts and providers located here in California. The more areas closed, the more our states economy takes another negative hit. Not to mention the local economies that thrive and sustain their lives based on the tourism the ohv areas bring to these otherwise unpopulated areas."
ed hall	Rancho Cucamonga, CA	2019-07-02	"I believe they our the tax payers dunes not the local or state governments to decide. Give us our freedom back!"
Jamie Ungar	Truckee, CA	2019-07-02	"I support this!!"
Ryan Anderson	Anaheim, CA	2019-07-02	"Let's keep the good times rolling!!"
Delia Solorzano	Buellton, CA	2019-07-03	"I agree with this"
chris mckenzie	surprise, AZ	2019-07-03	"i support OHV"
Justin Hansen	Paso Robles, CA	2019-07-03	"It is my right to be able to enjoy OUR land. Home of the FREE because of the brave. Taking away this OHV family destination will devastate the economy. Not just the 5 cities area, but food and fuel that is bought between their place of travel to Oceano. Braaaaap!"
Shane Curiel	Goleta, US	2019-07-03	"California needs to have OHV areas. Or else we will see an influx ohv vehicles on the road!"
robert reeves	Miami, FL	2019-07-03	"Land seizures brought to you by libtards you suck their own farts."
Jose Gutierrez	Tulare, CA	2019-07-03	"Closure is not managment."
Ronald Kem	Long Beach, CA	2019-07-03	"Rk"
Malia Pule	Hayward, CA	2019-07-03	"We should have the right"
Nick Gomez	Santa Maria, US	2019-07-03	"It's ridiculous to close down.That can't happen."

Name	Location	Date	Comment
Christopher Henningsen	Sonora, CA	2019-07-03	"I feel this is another illegal government landgrab. The government does not own these lands, WE THE PEOPLE do, the government is to hold and maintain the lands in trust for the people to use, not close it off for special interests groups only, or to cow to small environmental groups who are lawsuit happy and who actually get paid by the government for the lawsuits. End the corruption, and reopen OUR lands, before we show you what the 2nd Amendment was written for, to stop tyrannical government."
Larry Glantz	Fort Lauderdale, FL	2019-07-03	"Jake Glaser is my friend and it is important to him"
scott wilcox	Oceanside, CA	2019-07-03	"I grew up going there. My father used to sand drag comp hill"
Calvin Shaffer	Brentwood, CA	2019-07-03	"I want it open that's why �"
Ian Reik	Oakland, CA	2019-07-03	"I support this"
James Feldermann	Brentwood, CA	2019-07-03	"Public land should be able to be enjoyed by the public in the manner they desire."
Micah Kerns	Riverside, CA	2019-07-03	"I want the dunes to stay open."
Rodolfo Cerda	Beckley, US	2019-07-03	"I love and enjoy riding plus I'm sure I'm not the only one!"
Pamela Martinez	Glendora, CA	2019-07-03	"I'm signing because the dunes should stay open for everyone"
Anthony garcia	Lakeside, CA	2019-07-03	"I want to"
Terry Valencia	US	2019-07-03	"Terry Valencia"
Denise Mclelan	US	2019-07-03	"I love the duned and have great memories of riding there with my brothers."
Christian Noyes	Las Vegas, NV	2019-07-03	"Wack should be able to ride there!"
Camron Decker	Walnut Creek, CA	2019-07-03	"Keep it open"
Bobbi Dochhrty	Santee, CA	2019-07-03	"Bobbi Docherty"
Daniel Alvarez	Oakland, CA	2019-07-03	"Keep it"
Jimmy Huynh	San Jose, US	2019-07-03	"Great family outing. Why close?"
Timothy Montes	Marina, CA	2019-07-03	"Non elected individuals making decisions for the masses."
Kenneth Rochester	Tallahassee, FL	2019-07-03	"We enjoyed our places to ride"
Deonne Reeves	Council Bluffs, IA	2019-07-03	"Such a perfect place to enjoy so many fun activities by people of all ages. Love it."
Christopher Clayton	Hesperia, CA	2019-07-03	"Keep these open so families can continue their traditions."
Jack Chiles	Yorba Linda, CA	2019-07-03	"I've never ridden there and I really want to"

Name	Location	Date	Comment
Elijah Boecker	Barstow, CA	2019-07-03	"My family and I have been going there for years and it has only been good times. It is the public's land."
Whitney Goodrich	Wanship, UT	2019-07-03	"It's important"
Yecenia Cabrera	Ontario, US	2019-07-03	"It's my sons favorite place to go for his birthday"
Christopher Thomas	Laguna Beach, US	2019-07-03	"We own the Land not the un-elected Coastal Commission.Time to get out and VOTE back your state!"
Justin Hill	Crestline, CA	2019-07-03	"Pismo is the shit fuck the tree huggers!"
Johnathon Miller	Fox Lake, IL	2019-07-03	"Fucking COMMIEfornia is at it again"
Jessie Chavez	Moreno Valley, US	2019-07-03	"This is all we have left we have no where to legally ride in ca You can not take this away from us!!"
Shaunda Sparling	Bakersfield, CA	2019-07-03	"It's a place for people to camp, relax and have some family time. It shouldn't be taken away."
Melinda Sutter	Felton, CA	2019-07-03	"My kids have camped here every xmas. If you want to reduce the numbers per day i could see that but eliminating completely is wrong."
Tyler Cronin	Santa Cruz, CA	2019-07-03	"Income to the local economy"
Jessie Chavez	Moreno Valley, US	2019-07-03	"Only place we have left other than glamis to legally ride how dare you take this away from us!!"
Shaun Wicks	San Diego, US	2019-07-03	"Keeping the places we love open."
Jennifer Santel	Vista, CA	2019-07-03	"Keeping outdoor space for people who ride is necessary. This is a family oriented activity that many have been raised with and these areas are where we play."
Saul Navarro	US	2019-07-03	"I prefer the presence of freedom to its opposite."
Roberta Slosson	Santa Maria, CA	2019-07-03	"We need to keep the Oceano dunes open for future children to use"
Michael Gonzalez	San Luis Obispo, US	2019-07-03	"The Trilogy/Monarch Dunes community should never have been approved for construction, especially for a community targeted at the elderly. The area has always had high airborne particulate matter which is generally not recommended for the elderly. The community should be condemned and the homes vacated. There is no feasible solution to reducing the airborne particulate matter in that area."
Alex Hidalgo	Aurora, CO	2019-07-03	"Kurt says it's important."
Valerie Lacey	West Linn, OR	2019-07-03	"We need access to recreation. US citizens, our legal visitors and residents."
Sylvia Clevenger	Magalia, CA	2019-07-03	"OHV is needed."

Name	Location	Date	Comment
Nicole Carlos	Coarsegold, US	2019-07-03	"I love the dunes. Can't close them!"
Junior Ruiz	Paramount, US	2019-07-03	"Can't close these dunes I had the best times here �"
allissa keyes	mesa, AZ	2019-07-03	"I love these dunes and respect all land and always clean up after myself and other people!!"
Elva Grell	Northridge, CA	2019-07-03	"My family enjoys their time spent there."
Suzanne Belding	Auburn, CA	2019-07-03	"Family outings and memories that are made at Pismo are irreplaceable"
Bobby Bartholomew	Aptos, US	2019-07-03	"This is a state park and needs to remain one for future use.  Theodore Roosevelt and John Muir preserved state parks for the future generations to experience. Pismo beach has been a staple in central California for a long time and all the local businesses will suffer and be impacted by this. There is land elsewhere that would be better used for a construction project. Do not close pismo beach!"
Christopher Session	Escondido, CA	2019-07-03	"I love this park and want it to remain open for all to enjoy"
Aleksandr Vydrug	Canoga park, US	2019-07-03	"One of a kind experience we can't afford to lose"
Matthew Sanders	Carlsbad, CA	2019-07-03	"Oceans dunes drives millions of dollars of revenue to the central coast every year. Thousands of households and small business will immediately be affected by the closure. The true impact of the Oceano dunes visitor/tourism dollar will never be fully realized until it is gone. Pismo beach and arroyo grande will see the greatest loss of revenue. All because some retired city slicker decided to retire (in the windiest portion) down wind from the dunes and complains about the dust. Wind blowing at 30mph will move more sand than any off road vehicle. Over thousands of years the dunes were formed by wind. The wind Through this portion of the central coast will never stop blowing. Hence the dust(ppm) and sand moving/encroaching will never stop."
Angie Leon	US	2019-07-03	"It's a fun activity"
Destiny Armendariz	Bakersfield, CA	2019-07-03	"This is a place of importance! Many families spend their summers here, as well as cherish there memories here. The only nice beach in California that you can camp out on! Don't take it away from us Californians."
Brian Roby	Hendersonville, US	2019-07-03	"Visited many times when I lived on the west coast. Would love to come back and enjoy the park later in life"
James Allred	Inglewood, US	2019-07-03	"Signing because it's BS to close this"
Judy Pelphrey	Corona, CA	2019-07-03	"I want to keep oceans dunes open"
Paul Varakuta	Easthampton, MA	2019-07-03	"M"
Daniel Henley	Fresno, US	2019-07-03	"I know so many that have grown up going to the dunes and to take them away would deeply impact the area. Those who want to shut

Name	Location	Date	Comment
			it down should've thought about it more before they signed the contracts. They can move and get another house along the coast somewhere. Not like they can't afford it."
Ryan Maestas	Henderson, US	2019-07-03	"I enjoy shredding the dunes right on the ocean. Keep our off-roading areas open as long as you keep demanding ohv fees."
Denise Reyes	Sacramento, US	2019-07-03	"So not nice that all the nice places you can enjoy with family and/or friends get closed."
Sarah Bohmker	Cave junction, US	2019-07-03	"It's one 6 mile stretch in a state that has over 700 miles of beach. It's the only place in the state, the revenue it brings in is in the millions. Keep the park!"
Fernando Gomez	Visalia, CA	2019-07-03	"Dont close this park"
Kenneth Fittro jr.	Alameda, US	2019-07-03	"Riding is my life!!"
candace covey	Hilmar, CA	2019-07-03	"Everyone loves this place & have been going there all there lives. It's a tradition to a lot of people I know. Why must they keep taking places like this from us? That so many families love & enjoy so much. Don't take the Dunes Frome us. A place we love to ride at & have a good times with great friends. We have made so many memories there & have expected to do so for many years to come. So why would they want to take it away from us??"
Billy Ruchert	Pomeroy, WA	2019-07-03	"Im sick and tired of the government over stepping its boundries, and taking our public land. Its been a dream of mine since i was 10 watching all the sand dune vids, to go to pismo and ride the dunes myself, and that dream may never happen now"
Travis Mittendorf	Oak Harbor, US	2019-07-03	"Yeah let's just ruin the local economy that is based on people coming to camp/ride on the dunes."
Travis Rubrecht	Beaverton, OR	2019-07-03	"I love the dunes"
Ginny Browning	Buckeye, AZ	2019-07-03	"The dunes are a great place to go"
Renee Edwards	Fresno, US	2019-07-03	"I wanna go"
Ryan Socia	Ventura, US	2019-07-03	"Don't do this to the futurekids are already glued to the phone, keep an outdoor activity alive!"
James Dieli	Kelsyville, CA	2019-07-03	"This place is amazing and needs to stay open"
Taylor Bradley	Placerville, US	2019-07-03	"Was just there last weekend and had a blast. Hope this closure does not happen."
Zachary Francis	Poway, US	2019-07-03	"Ive been riding and going camping with my family since i was a little kid and traditions need to be passed on"
Daniel Ebberts	Menifee, CA	2019-07-03	"Pismo is a great and fun family destination for us!"
brady mcandrews	Fremont, CA	2019-07-03	"I grew up going to the dunes,want my kids to do the same"

Name	Location	Date	Comment
Tamyra Fenstermaker	Placerville, US	2019-07-03	"Love the dunes and the family times we shared with me kids and grandkids"
Vincent Smith	Pottsboro, TX	2019-07-03	"Do it"
Roger Ortiz	Gilroy, CA	2019-07-03	"I ♥# dunes"
Jeffrey Garrison	Riverside, CA	2019-07-03	"I want us to have a place to play!!!"
James Tyree II	Portland, OR	2019-07-03	"We need more places not fewer!"
Brian Antonik	Cleveland, OH	2019-07-03	"Keep these dunes OPEN!!! Millions and Millions of acres of land are locked up across the country. The few thousand acres that we get to OHV on are a tiny bit in comparison. Plenty of space for EVERYONE and their interests!
Donnell Scott	Napa, CA	2019-07-03	"I'm tired of our rights to ride being taken away"
Dusty Prill	Woods Cross, UT	2019-07-03	"Keep our trail open"
Chelsi Bennett	Boise, US	2019-07-03	"My niece who loves it there."
Dylan Baines	San Diego, US	2019-07-03	"I ride."
David Valerga	Lower Lake, CA	2019-07-03	"Because freedom"
Steven Velazquez	San Diego, US	2019-07-03	"All about conservation, but we have to find a way to keep this park open the OHV use!"
Jeremy Lambert	Whittier, US	2019-07-03	"Stop taking outdoor family fun away from responsible people!!"
Joseph Marin	Los Angeles, CA	2019-07-03	"I've camped here since I was a kid and would love to take my kids someday."
Jentry Young	Roberts, ID	2019-07-03	"The way to protect natural ground is by allowing people to use it. There has to be a balance. It's not the off road community you should be worried about. When corporations roll in, they will stand and fight. Why? It's simple. They're love and passion for the outdoors. Pushing everyone and everything out of this land might seem like it is "helping" the land stay natural. Maybe short term, but our grand kids won't give a rat's ass about it if you bar them out. If you actually love and care the natural world. Take people on hikes, mountain biking, snowmobiling, off roading and anything else that gets them there and teach them to respect it."
Reid Hooper	Mission Viejo, US	2019-07-03	"Stop taking away the outdoor family fun and LEARNING activity's."
Brenden Clark	Bakersfield, US	2019-07-03	"Natural selection is everywhere!! Don't take it away!!"
George Hickey	Newberg, OR	2019-07-03	"I am signing because it is our land and well , we pay for it"
Juan Valladolid	Los Angeles, CA	2019-07-03	"Because tradition. Memories. Favorite place in the 805."
Austin Gross	Downey, CA	2019-07-03	"Who would want the dunes to close?"

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Jose e menera	San jose, US	2019-07-03	"Been riding this dunes with family and friends for years, hope oceano dunes stay open for many years to come"
Justin Johnson	Roosevelt, UT	2019-07-03	"Extremely important Cause."
Norman Dillon	Denver, CO	2019-07-03	"These are our lands!"
Skip Streets	San Clemente, CA	2019-07-03	"Open space matters"
scott bertken	tracy, CA	2019-07-03	"Keep the dunes open."
KIm Goss	Nipomo, CA	2019-07-03	"Keep the beach open for all of us to use! WIND BLOWS"
Mike Coe	Havasu lake, US	2019-07-03	"We pay for it"
matthew doherty	Lakeside, CA	2019-07-03	"Stop shutting down ohv areas"
Nate Romero	Phoenix, US	2019-07-03	"I don't know why they would want to close the dunes it makes no sense can't believe I'm hearing about this."
David Corell	Glendale, CA	2019-07-03	"I love motorcycles and freedom"
ty goodin	custer, WA	2019-07-03	"Too much government control"
Mark Jordan	Ventura, CA	2019-07-03	"I am signing because I recreate at the dunes and was planning to take my son there when he's old enough. Don't take this experience away from me and my family for a bunch of rich people who knew there was dust there even without the OHV park. This public use was well in place before these people moved in."
Judith May	Orlando, FL	2019-07-03	"The Dunes is a place that is loved by so many people, it is a fun place where a family can have some good, clean fun. Please keep it open for all."
Inderjit Singh	Fresno, US	2019-07-03	"Keep the dunes open"
Elinor castellanos	Fresno, CA	2019-07-03	"I'm from Nipomo and the beach was always my place to go to relax, it's where my soon to be husband had our first date! It's our place and we love it don't close the beach down"
Kevin Romanowski	Jensen Beach, FL	2019-07-03	"Left California because of instances like this. So many places I used to be able to hike, camp, off-road, explore, all gone. They take the fat pockets over thinking about what the people who live there like to do."
Dustyn loppnow	Calimesa, CA	2019-07-03	"My family has been going for over 20 years. I just went last month. It's a great place to make memories. What a shame, the government is trying to take more of our ohv areas."
Dominic Deleon	Vallejo, CA	2019-07-03	"I love pismo been there since I was a baby and been riding razors there since then to now"

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Armando Rodriguez	Marina, CA	2019-07-03	"My family and I look forward to our Pismo vacations every year, I would hate telling my kids they no longer have a place to enjoy a late night bonfire or a place they can enjoy riding their quads."
Joy Taylor	Louisville, CO	2019-07-03	"This has been a recreation for multi generations in my family. This is a park that belongs to the residents of California. We need to take back the power from our government officials. This is one more disgrace to Americans and what this means to our future."
Sherwin Hojjati	Torrance, CA	2019-07-03	"1st off-road trip was here 16 years ago and I've been hooked evey since! My future children need a chance to experience the same!"
mark arp	Claremont, CA	2019-07-03	"Been going to Oceano/Pismo for 20 years. Was our Annual Summer Camping trip!. Sad part is the town will die withoutvall the rider revenue!!"
Timothy Dunne	Littlerock, CA	2019-07-03	"Pismo is a great opportunity for families to get out and enjoy the west coasts only beach where we can ride our OHV vehicles and camp and make great lasting memories. Also where the people of the deserts of California can escape the heat and ride year around. I love going there and would hate to see this wonderful place go away. Keep our beach open to us."
Ken Jamieson	Eugene, OR	2019-07-03	"Ken Jamieson"
William Murray	Medina, OH	2019-07-03	"Cause it's ridiculous"
Jim Griffin	Aptos, CA	2019-07-03	"This is a huge economic and recreation benefit for our communities and youth"
Javier Rodriguez	Rancho Cordova, CA	2019-07-03	"Javier Rodriguez"
Benjamin Sutton-Brown	Ashby, MA	2019-07-03	"To keep off-roading alive"
Jerid Dollschnieder	Lancaster, CA	2019-07-03	"Keep pismo open!"
Dave Snedden	Las Vegas, NV	2019-07-03	"Our country, our land !"
Nathan Hinojosa	Los Angeles, CA	2019-07-03	"Bikes are life"
James Ferrenburg	US	2019-07-03	"I love off road adventures and taking care of our lands."
Adrian Rodriguez	National City, CA	2019-07-03	"I'm singing because I love going here to ride and was planning a trip there"
Chris Gallop	Burlingame, CA	2019-07-03	"Pismo is a place for families and friends to share the beauty of California and enjoy lifetime memories. As our population grows this bonding experience increases the value of California's natural beauty improving the lives of our fellow citizens."
Michael Link	North Tonawanda, NY	2019-07-03	"I ride!!"

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Brian Allison	Crestline, CA	2019-07-03	"This should stay open to hov so my grand children can enjoy it as every generation of my family has up through my grand father, riding his bull taco."
Danielle Fortner	Fairview, TN	2019-07-03	"I grew up on the central coast. It would be a shame to future generations to shut down the dunes."
Matt Tilston	Repentigny, Canada	2019-07-03	"This is a passion on my own as well as so many others"
Jeff Spiszer	uplancd, CA	2019-07-03	"They've closed down enough"
Jason Worthington	Alpine, US	2019-07-03	"Great place for families to ride!"
William Ross	Oceanside, US	2019-07-03	"Go big or go home!"
Jeffrey Delte	Chico, CA	2019-07-03	"Keep them open!!!"
Blain Danley	Ventura, US	2019-07-03	"Ocean dunes are junk now days but hopefully one day they will open it up like it used to be"
Jerahmia Fischer	Vista, CA	2019-07-03	"I want to ride!"
Karina Lopez	Fontana, CA	2019-07-03	"Keep them open. We have made a lot of good memories here with friends and family. My kids love this place."
Lauren Martin	Fort Collins, CO	2019-07-03	"Please don't take away this great place!"
Alex Niz	San pedro, US	2019-07-03	"Been going here since I was a kid!!!"
Jeff Brock	Reseda, US	2019-07-03	"I been going to pismo since I was a kid to drive and when I got my atvs beem going there to see the beach camp and ride I'm 34 so I been going up there for long time and now this come on also if they close it it's going to hurt alot of people coming up there going to hurt alot of local businesses that make a lovineg off of tourists and people who go there to camp and ride there toys on the beach please dont close it"
Nick Korbe	Portland, OR	2019-07-03	"Love and protect the dunes 落�"
Michael Volpe	Parker, AZ	2019-07-03	"The country belongs to WE THE PEOPLE! Not a bunch of bureaucrats' trying to justify their existence!!"
Edward Cekovic	San Francisco, CA	2019-07-03	"It is our right to have access and use of this land."
Isela Quiroz	Imperial, CA	2019-07-03	"This is a sport that gives parents the chance to bond with there kids"
Vicki Monte	Santa Maria, CA	2019-07-03	"We should have one place where we can drive on and use. Not right to close it"
Marcie Worthington	Alpine, US	2019-07-03	"To stop Hilary supporters from taking away more rights"

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jeff chang	san jose, CA	2019-07-03	"Just a day at the dunes with all the buddies blast! You are not gonna be able to atv anywhere else close! Parks are meant to be for the people! Not government!"
Michael Allen	Portland, OR	2019-07-03	"Amazing experience"
Michelle Carter	Vancouver, WA	2019-07-03	"Duh!"
Rachel Rodriguez	Pittsburg, CA	2019-07-03	"The dunes are such a great outdoor adventure that should be experienced by all!!!"
Xavier Lomeli	North Las Vegas, US	2019-07-03	"Love that we all cane together to fight this"
Pamela Riley	Phoenix, US	2019-07-03	"It's a fun and wonderful place for families. To shut it down is senseless for such a magnificent place."
Bobby Ratto	Novato, CA	2019-07-03	"Keep ohv areas open."
Philip Cairns	Canada	2019-07-03	"I love dunes"
Brent Ruddell	Coeur d'Alene, ID	2019-07-03	"I would hate our riding areas too be taken away."
Moe Torres	Pacoima, US	2019-07-03	"I love dunes!"
Gregory Coggins	US	2019-07-03	"He's my nephewgotta support him"
Fern Rivas	Moreno Valley, US	2019-07-03	"I love these dunes!!"
Edwin Cushing	Martinez, CA	2019-07-03	"Closing this place is ridiculous. The opposition is lying about what is creating the sand at the homes affected."
Jessica Buck	Fullerton, CA	2019-07-03	"I grew up in the dunes."
Jack Gortner	Buena Park, CA	2019-07-03	"Save the dunes"
Craig McClellan	Goleta, CA	2019-07-03	"Oceano Dunes belongs to the people of CA. It is such an awesome place and there is nothing like it. So many good memories there. I hope to share it with my daughter some day."
Ferni Rivas	Moreno Valley, US	2019-07-03	"Excellent place to be to unwind!!"
Tim Boyle	Carbondale, CO	2019-07-03	"Keep the dunes multi use, mobility impaired folk can't go for a 'hike' in the dunes."
Leslie Gores	Nuevo, CA	2019-07-03	"It needs to be done"
Nicholas Berry	Simi Valley, CA	2019-07-03	"I'm a offroad enthusiast. More and more land is being taken from us everyday"
Ruben Llamas	US	2019-07-03	"Idk"
Allison schrafel	phoenix, AZ	2019-07-03	"I want the chance to ride here"

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Janice Boelter	Hesperia, CA	2019-07-03	"Janice Boelter"
Jacqueline Martinez	Oxnard, CA	2019-07-03	"It's important to have this safe place"
William Biller	escondido, CA	2019-07-03	"I love to ride out there"
Jazmine Rodriguez	Victorville, US	2019-07-03	"Please don't take our ohv"
robbie hett	glendora, CA	2019-07-03	"It's the right thing to do. We are losing all land of recreation to our government. Time to figjt back."
Jennifer Navarro	Tujunga, CA	2019-07-03	"My family and friends frequent this site and its always fun for all, a nice family atmosphere to relax and have fun."
Loyd Kruse	Eugene, OR	2019-07-03	"We do not need miles of sand enjoyed by no one"
Melissa Kay	Henderson, NV	2019-07-03	"I love riding the dunes"
Sherif M.	Los Angeles, CA	2019-07-03	"Preserve Camping and OHV RIGHTS!"
Logan Perini	Seattle, US	2019-07-03	"It's our right !"
Luis Quintero	Victorville, US	2019-07-03	"Keep on signing we've got this !!"
Martha Aceves	Acton, CA	2019-07-03	"We need our 1 spot in California where we can ride."
Luis Quintero	Victorville, US	2019-07-03	"Have never been here and would hate for this place to close. Would definitely love to go sometime hope this place stays open"
croix bartel	Lakeside, US	2019-07-03	"I understand wanting to close these ohv areas due to trash and vegetation damage but closing them is not the answer. People need to be educated. Also, think about this government, less funds for you from gas, trucks sales, trailer sales, ohv sales etc. Think about the businesses that will go under from the loss of sales. Please reconsider your options"
James Ditzler	Mokelumne Hill, CA	2019-07-03	"People depend on the revenue that is brought in."
Patrick McCuiston	Shingle Springs, CA	2019-07-03	"I am signing because I recreate at Oceano Dunes and believe in protecting our dunes as a steward of the dunes, however total closure off OHV's is not the solution. This is discrimination under the guise of conservation. Shame on the Coastal Commission to exclude OHV users and discriminate."
Nick Danna	Fort worth, US	2019-07-03	"A beautiful place , a fun place and definitely an income for the town, dont take it away."
cody johnson	Simi Valley, CA	2019-07-03	"I love this place"
RoseMerry Toney	Willcox, AZ	2019-07-03	"Its the right thing to do."
Fernando Flores	San diego, CA	2019-07-03	"We need places to take ohv to and have fun with families"
Dylan Rogers	Santa Clarita, US	2019-07-03	"Glamis is too hot for the summer so this is where I go"

Name	Location	Date	Comment
Channon Mitchell	Lompoc, CA	2019-07-03	"The Central Coast needs it. The Dunes are a hot spot for locals and tourists. It helps the local economy, generates tax revenue, and gives families a place for clean, honest fun."
Ruben Cortez	Rialto, US	2019-07-03	"Family yearly trip and family friendly"
liam knoblock	Sparks, NV	2019-07-03	"I can"
Ralph and Susan Foster	San Clemente, CA	2019-07-03	"I love camping at Pismo and this is so typical of what is happening to my once amazing native state! Corruption at its finest!!!!"
Heidi Carrie	US	2019-07-03	"I think California needs to keep the dunes open for riders and their families."
Jeremy Glenn	Palmdale, CA	2019-07-03	"This is where I learned to ride! Hope this helps!"
Scott Berry	Atascadero, CA	2019-07-03	"Please don't close this We truly enjoy going here."
Kyle Carlson	Moab, US	2019-07-03	"Keep the dunes open!!!"
Lisa Corona	Alabama	2019-07-03	"I used to ride when I was young. We need to keep places like this for riders. I do believe that campers need to respect the land and make sure they pick up their trash when leaving. Keep it clean"
Bonnie Betancourt	Glendale, CA	2019-07-03	"Craig is my friend. Craig like to ride dirt bikes. I support what my friend likes."
Michelle Roche-Gilmore	US	2019-07-03	"Michelle Gilmore"
Robert Mamlouk	Rialto, CA	2019-07-03	"Protect the camp"
Laura Smolyar	Los Angeles, CA	2019-07-03	"I strongly believe in the cause."
Tina Mae	US	2019-07-03	"I grew up going here and I think the town will be greatly hurt economically from this."
Lisa Fernandez	US	2019-07-03	"Lisa fernandez"
Tanya Devriese	US	2019-07-03	"Tanya kraus"
Daisy Marquez	Menifee, CA	2019-07-03	"I believe that dailies need a place to make memories and have family time."
John Brammer	Murrieta, US	2019-07-03	"Visit California. Its not just marketing, the Dunes are a reason to visit. Countless memories are part of this beach. Beyond the memories, closing the dunes will drastically reduce economic viability of local independent merchants/businesses which rely on the draw of the dunes. Keep the Dunes OPEN!"
Angela Sanchez	Moreno Valley, CA	2019-07-03	"Keep.it open."
Andrew Bittner	Reno, US	2019-07-03	"Sign!"

Name	Location	Date	Comment
Johnathan Downhill	Big Bear, CA	2019-07-03	"Keep our lands open toAll users"
Sandra Chamberlain	Vancouver, WA	2019-07-03	"This is what we love to do! �"
Shawn Sullivan	Silt, CO	2019-07-03	"I enjoy my family vacations in the area. It would also bring a large economic hit to the area if closed."
Dave Smith	Morgan Hill, CA	2019-07-03	"Let people live in this great country. Keep this place open!"
jose ordaz	salinas, US	2019-07-03	"my entire family looks forward to visit this camp ground all year long. super sad if my younger children will not have a chance to experience these dunes"
Rene Kozar	Ardmore, OK	2019-07-03	"I used to go there as a kid and camp with my family. Kids should still be able to have these experiences"
David Whitney	Syracuse, UT	2019-07-03	"I believe the people of California should have these rights!"
Hayes Irving	Boone, US	2019-07-03	"Save the Dunes!"
Richard Roe	Alhambra, US	2019-07-03	"Keep our lands open to use��"
Erika Vega-Sanchez	US	2019-07-03	"Family/friends yearly trip for father's day weekend"
Pablo Martinez	Manteca, CA	2019-07-03	"I feel it is a beautiful place for off-road enthusiast to spend quality time with family and friends enjoying the California coast. It's all we have ."
Michael Newton	Fresno, US	2019-07-03	"Save the dunes! Otherwise, I and my \$\$\$ will never visit Pismo again."
Braydin Burns	Vacaville, US	2019-07-03	"Save the Dunes!!!!!!!!!"
Kile Miller	Riverside, US	2019-07-03	"Save the dunes!"
Misty Hester	Nehalem, OR	2019-07-03	"We love the dunes"
Lauren Hepner	US	2019-07-03	"We love the dunes!"
Christina Gillgren	Napa, CA	2019-07-03	"It's good clean fun."
Charles Vreeland	St George, US	2019-07-03	"Don't let them take our parks!"
Linda Yost	Rancho Cucamonga, CA	2019-07-03	"This area should remain open for riders from everywhere to enjoy!"
Jeremy Best	Columbia, SC	2019-07-03	"Motorsport, in all forms needs to be saved. Motorists need a place where tings can be done in a safe and legal manner."
Cindy Van Slyke	Alturas, CA	2019-07-03	"This is wrong stop being stupid"
Albert Khudeta	Los Angeles, CA	2019-07-03	"I love that place"

Name	Location	Date	Comment
Carter Collins	Santa Margarita, CA	2019-07-03	"I am a fan of public lands. The dunes need tighter restrictions but closure is not the restrictions."
Leticis Serrano	Tustin, CA	2019-07-03	"Leticia Serrano"
Tatenysha Harris	Emeryville, CA	2019-07-03	"It's our right"
Juan Gara	Mexico	2019-07-03	"Awesome place"
Javier Pulido	Hayward, US	2019-07-03	"Make Pismo great again"
Aaron Parker	Redwood City, CA	2019-07-03	"Save public lands"
alfredo ramos	Los Angeles, CA	2019-07-03	"to keep the dunes open"
Stephen Marks	US	2019-07-03	"It should be kept as public land"
George Moser	Westminster, CA	2019-07-03	"Let us keep what little is left for us."
JACOB EATON	Carson, CA	2019-07-03	"Oceano Dunes have been the source of many great memories and good times with friends. Very many people, including myself cherish this park. It MUST be kept open to offroad vehicles and camping."
Shannan Cunningham	St. Helens, OR	2019-07-03	"I am a rider along with my husband. We just spent the last 5 days camping and riding the dunes with a group of 25 people. It's a yearly thing. Still would like to be able to keep doing it."
James Griffin	Modesto, CA	2019-07-03	"One of my favorite memories is riding motorcycles with my family in those dunes. Don't take that away from future generations."
sam conner	Pahrump, NV	2019-07-03	"I use and love the dunes just like everyone else"
Justyn Salisbury	Meridian, ID	2019-07-03	"I'm tired of liberals"
Nick Kaslofski	US	2019-07-03	"It's important"
Andrew Allen	Littleton, US	2019-07-03	"Would love to wheel there one day, we cannot lose this important historic recreational area."
Ryan Cash	San Jose, CA	2019-07-03	"I have always wanted to go to pismo"
Kimberly Kemp	Alameda, US	2019-07-03	"I have great memories of camping and riding on this beach!!"
Shelly Smith	Pleasanton, CA	2019-07-03	"I learn how to ride at Pismo. It is such a beautiful place to be camping, and riding."
Jalyssa Alvarado	Corcoran, CA	2019-07-03	"Want to make more memories with my friends / family. Don't punish those who've been careful and responsible for others actions."
Christian Echavarria	Menifee, US	2019-07-03	"I'm signing because Amber is one of the most out-going and loving individuals I know!! A role model among Queens!! Her hard work is my motivation!!! GO AMBER!!"

Name	Location	Date	Comment
Amanda Hooper	Menifee, CA	2019-07-03	"I'm signing because I grew up camping here and had a lot of fun and made awesome memories! And soon make more memories but in order to do that, it needs to stay open!"
Kyle Dougherty	Santee, CA	2019-07-03	"Stop taking away public land. I pay my taxes. So stop shutting it down."
Sergio Fortich	Santa Ana, US	2019-07-03	"I'm signing because we need a place to have fun, it's better to be there instead of the freeway for example"
Kim Duchscher	Florence, US	2019-07-03	"If they start here they won't stop! The dunes are what keeps us little towns opened!! They're already taking so much stuff away from us as it is, we need to put our foot/feet down!!! KEEP THE SAND DUNES OPEN!!!"
Anne Peronne	New York, NY	2019-07-03	"I'm signing this to protect recreational spaces for families"
Amanda Everest	Las Vegas, NV	2019-07-03	"I'm signing because my best friend grew up here and has amazing memories and her kids deserve to make the same!"
Brett Everling	San Luis Obispo, CA	2019-07-03	"I'm a local resident of the Central Coast. I grew on the edge of Nipomo, in the area where supposedly the air quality is affected by vehicle activity from the Oceano Dunes OHV Park. I lived there for 30 years and never once had an issue with air quality, nor did I know anyone else in the area that did. One thing I did notice was, that area is a tunnel for wind. Several air quality studies have been conducted over the years. There has been no scientific evidence produced from these air quality studies proving that OHV use in areas adjacent to the park contributes to an increase of particulate in the air, or a decrease of air quality. It doesn't take a rocket scientist to understand that when you mix heavy wind with mountains of sand, you're going to have particulate in the air. Using simple logical deduction, it also doesn't take a rocket scientist to come to the conclusion that vehicle use is not a catalyst for poor air quality in the areas adjacent to the Oceano Dunes in regards to adding particulate to the"
Eva Arebalo	San Miguel, CA	2019-07-03	"This is not OK - this is our beach!"
John Llado	Lake Elsinore, CA	2019-07-03	"Californians has a vast amount of land yet very little public lands are set aside for off Roading. Pismo is the ONLY beach/Ocean riding area a it brings jobs and tax money locally and state wide."
Jacob Cortes	Winchester, US	2019-07-03	"I grew up going here all the liberals want to ruin California"
mike haddad	Inglewood, CA	2019-07-03	"Great family place, it should not be closed!"
Jesse Marsh	Reno, NV	2019-07-03	"When Lord when, when's it going to stop."
Michael Santos	Tracy, CA	2019-07-03	"Don't make public land unavailable."
Lexy Barajas Chavez	Lancaster, US	2019-07-03	"Oceano Dunes is an awesome place for a weekend getaway with your family. ATVs are what keep this place going, the vibe is great."
Leighton Bovee	Lompoc, US	2019-07-03	"Love spending time exploring the duned"

Name	Location	Date	Comment
Ryan Stokes	Moreno Valley, CA	2019-07-03	"I have been going to pismo beach since i was 5 years old. Awesome place, provies alot of money for the Arroyo grande community which will cause alot of the businesses there to loose money on all the thousands of people who visit all year long. Please keep pismo beach open amd provide more EMS and police officers to help patrol the area."
Douglass Stairs	Rohnert Park, CA	2019-07-03	"I love it there"
Zachary Burris	Huntington Beach, CA	2019-07-03	"K"
Cameron McLeod	Los Angeles, US	2019-07-03	"Pismo dunes is my favorite place to not only ride but enjoy camping surfing and other fun family/friend activities. This place closing would be devastating to local businesses and local campers. Please keep pismo dunes Alive!"
Jaime Mendez	Tampa, US	2019-07-03	"Pismo dunes the best place ever , I hope they never shut it down I've been going the my whole life"
Stephanie Huff	Kirkland, WA	2019-07-03	"It's the right thing to do, I have known Adam for many years as I worked with him so long ago"
Lane Mcgann	Sonora, CA	2019-07-03	"It's the right thing to do"
Jenna Lombardi	Hollister, US	2019-07-03	"Because my family lives for this place"
Kali Rodriguez	Ripon, CA	2019-07-03	"I spent so much time at Oceano Dunes with my family as a kid! We spent holidays and countless weekends there! I learned to ride my first quad on that beach! I would be so sad to see this place go"
Benjamin Smith	Pico Rivera, CA	2019-07-03	"They have closed enough of those dunes."
Jeff van Damme	Santa Cruz, CA	2019-07-03	"We need to keep areas open it's our right to enjoy this land responsibly there's no good reason to shut it down"
alex steck	Menlo Park, CA	2019-07-03	"California is getting to extrmem and needs to cool its jets"
ashley matos	Hanford, CA	2019-07-03	"I grew up going to these dunes and now i take my 2 kids there and we love going to the beach and driving our truck out on the beach with our kids!"
Sean White	Redmond, WA	2019-07-03	"Recreational vehicles are our blood and we need to be able to ride them in the few spots that are still available."
rynn bethell	Van Nuys, CA	2019-07-03	"I grew up there and its a family tradition to have fun at the dunes!"
Alex Hess	Port Orchard, US	2019-07-03	"I"
Cole Kreutzer	Seattle, WA	2019-07-03	"I live near and ride on the dunes all the time back home!"
Hannah Johnson	Orange, CA	2019-07-03	"I come here almost every year to camp and roam around on the dunes! I love watching the kite surfers while camping in the truck

Name	Location	Date	Comment
			Pleasseee california can we just keep the cool stuff around for our children to love and enjoy??"
Kimberly Roice	Tulare, CA	2019-07-03	"This is my favorite place to go. Where else can you camp on the beach, drive on the beach and walk on the beach."
Erik Frolov	Sacramento, US	2019-07-03	"Keep it open"
taylor kim	San Jose, US	2019-07-03	"please do what we can to keep it open"
Sandy Skinner	San Antonio, TX	2019-07-03	"Keep the park open!"
Jennifer Tessaro	Allen, TX	2019-07-03	"I grew up on these dunes and visit every time I come home I would HATE to see us lose the rest of our land!"
Travis Andrews	Huntington Beach, CA	2019-07-03	"Travis Andrews"
Kayla Smith	Coeur d'Alene, ID	2019-07-03	"I'm from here"
Andres Cruz	Redwood city, US	2019-07-03	"Its a nice place to camp."
Connor Allred	Sacramento, CA	2019-07-03	"I'm signing because in the future I wanna go ride quads in these dunes"
George Madaryan	Los Angeles, CA	2019-07-03	"No legitimate reason to be closing the dune. People need to open their eyes. Hope it doesn't close down"
betsy higginbotham	Campo, CA	2019-07-03	"Keep recreation open for generations to come! Americans value our places to play , and they work hard for their time and place to play! This is one of the benefits of being taxed as much as we are, the price has been paid! Hands off!"
charity brown	Hanford, CA	2019-07-03	"This is a place of tradition for so many generations past and present"
Ryan Rosso	Temecula, US	2019-07-03	"Rage against rhe machine!"
Tony Galaviz	US	2019-07-03	"Tonygalaviz"
Dylan Rider	Wellington, US	2019-07-03	"To stop the commies"
Chase Caldwell	US	2019-07-03	"I couldn't imagine having something that is and has been such a big impact on so many peoples lives away and shutting it down. These dunes need to stay open!"
Dylan Rider	Wellington, US	2019-07-03	"To stop the commies"
Dylan Rider	Wellington, US	2019-07-03	"To stop the commies"
Dylan Rider	Wellington, US	2019-07-03	"Who is here to stop the communist? I know I am."
Cristina Claxton	Newbury park, CA	2019-07-03	"Cristina claxton"

Name	Location	Date	Comment
Fernando Carrillo	Riverside, US	2019-07-03	"My father brought me here when I was 15, and I better get that same chance for my kids too in the future. Thanks to Steve's ATVs for bringing the fun of motorsports and dunes to people of all ages, including myself."
kami finch	Oxnard, CA	2019-07-03	"It's like closing toys r us"
Loretta Storment	US	2019-07-03	"I a. Signing to keep Oceano Dunes open as my family and friends have come here for years. We cleanup and take care of the dunes and teach our kids about this life here at these dunes."
Sonia Sedano	Corona, CA	2019-07-03	"I love to ride"
Milton Reyes	Novato, CA	2019-07-03	"We need OCEANO DUNES SVRA!!"
Monique Najar	Phoenix, US	2019-07-03	"Never been there personally but it beats driving hours the other direction east to get to any other dunes."
Taha Diah	San Diego, CA	2019-07-03	"Never been and idk what it is but from all the ppl getting upset over this why not help �"
Brandon Taylor	Puyallup, US	2019-07-03	"Its public land and we the people have the right to ride on it"
Nena Garcia	Delano, US	2019-07-03	"We love going with the family and having a good time"
Christian Ortiz	El Cajon, CA	2019-07-03	"Grew up there as a child riding with many family. so many memories I hope to create with my kids one day"
Brandee Church	Nipomo, CA	2019-07-03	"Literally come here almost every day. Have been for years. It's a place that so many can gather & have good, clean fun. For me, I come out for the serenity of it all. Pure bliss! Don't take away one of the rarest beaches!!! Closing down the dunes will have so many negative effects on our central coast!"
Baily Wahl	Lilburn, GA	2019-07-03	"The dunes were apart of my childhood."
Heath Dunn	Basalt, CO	2019-07-03	"We used to go there as kids. Nothing better than an ATV in the sand. I'd love for my kids and their kids to enjoy the dunes as well and not through a fence looking at them"
James Smith	Martinez, CA	2019-07-03	"I ride"
LAMBERT CONE	Tucson, AZ	2019-07-03	"AMERICANS NEED OPEN PLACES FIR RECREATIONAL USE"
Aleah metzler	Sacramento, CA	2019-07-03	"I love the ocean and want to keep the dunes clean!"
Juan Gonzalez	Gilbert, AZ	2019-07-03	"I need to send it juan day"
Matthew Sanchez	Claremont, CA	2019-07-03	"It is a great place to ride with family and friends"
Charles Sparks	Branson, Mo., MO	2019-07-03	"Keep this place open!"
Peter Gilpatric	Huntington Beach, US	2019-07-03	"We need to protect what little riding areas we have so our kids can enjoy them just as we have!"

Name	Location	Date	Comment
Jared Skinner	Merced, CA	2019-07-03	"Naturalists and politicians have taken enough from tax paying citizens like me."
Jack Wall	Litchfield Park, AZ	2019-07-03	"This area needs to stay open to for offroad recreation!!"
Joshua Brouhard	Lake Havasu City, AZ	2019-07-03	"I would go camping there when I was a kid and I would like to be able to take my son camping there."
Rusty Wiggers	Winnsboro, LA	2019-07-03	"I'm signing because even though i live Louisiana , being able to visit this historic and Iconic Park is important to me !"
Brian Freiermuth	Watsinville, CA	2019-07-03	".State owned property is for all to enjoy weather it be for hikng camping fishing hunting bike riding its our property as tax payers to decide. Let citizens vote on it. Just don't let the state officials Have the only say. A lot of buisness"s will end up closing."
Trey Hanson	East Wenatchee, WA	2019-07-03	"I support happiness"
Richard Carman	Rome, NY	2019-07-03	"I support off road riding."
Cody Van Engen	US	2019-07-03	"Freedom"
Paul Kleizo	La Palma, US	2019-07-03	"I support off roading, we deserve to have this area and more kept open or re-opened."
Scott Anderson	Escalon, CA	2019-07-03	"Stop the government overreaching and interfering into everything we do as Americans."
Jiseph Whiting	Livingston, TX	2019-07-03	"We need to keep places for kids to learn the fundamentals or riding and driving"
chris florian	san diego, CA	2019-07-03	"This is not a place that should be shut down"
Michael Buckett	San Jose, CA	2019-07-03	"Fuck California and its liberal pussies always having shit removed, remove the liberals"
Rodrigo Yamagishi	Mesquite, TX	2019-07-03	"Supporting the community �"
Hernan Feria	Escondido, CA	2019-07-03	"Stop this shut down"
Nancy McAllister	Joshua Tree, CA	2019-07-03	"I'm signing because we have had our family trips there for yearsplease keep this open!!!! As we approach our annual family trip it saddens me and my family that this could be out last. Whatever else I need to do I will do to keep oceano dunes open."
Shaun Singer	Woodland Hills, CA	2019-07-03	"Keep Pismo Open!"
Debbara Monroe	Pacifica, CA	2019-07-03	"Debbara Monroe"
Brian Rasey	Union Lake, MI	2019-07-03	"Keep our lands open for ORV!"
Stacy Jackson	EL CAJON, CA	2019-07-03	"This is where my son loves to go! He now wants his daughter and son to enjoy it as well! Yes"

Name	Location	Date	Comment
Anthony Cully	Yorba Linda, US	2019-07-03	"Keep Pismo open!"
mike berrios	Hayward, CA	2019-07-03	"Save the park!!"
Javier Garcia	Edcouch, TX	2019-07-03	"No one takes our land, Our freedom."
Dianne Coleman	Farmington, NM	2019-07-03	"It matters"
Mike Brown	Stevinson, CA	2019-07-03	"There are parks all over California and a lot of them have gang activity and drugs and they stay open"
Jennifer Richter	n/a, IL	2019-07-03	"Keep the beach open!!!"
Michael Hopkins	Fenton, MI	2019-07-03	"I like dunes"
dara lewis	Renton, WA	2019-07-03	"I believe in the tax payers RIGHT to enjoy the outdoors without govt interference"
Jonathan Brewster	Louisville, US	2019-07-03	"Don't take our dunes"
Jace Price	Las Vegas, NV	2019-07-03	"I like more area to use my passion"
Daniel Lewis	Port Saint lucie, FL	2019-07-03	"Need more riding places not less. Don't close the dune!"
Ignacio Acosta jr.	Riverside, CA	2019-07-03	"Don't take it from us"
Griselda Larios	Sylmar, CA	2019-07-03	"I love Pismo dunes"
Michael Fausett	Bakersfield, US	2019-07-03	"Please don't close Pismo dunes! This is my family's vacation spot and has been for the last 10 years!"
Matthew Gilding	Lincoln, US	2019-07-03	"My first time ever riding a three wheeler atv was in Pismo beach. I was 10 years old then, now I'm 46. DON'T close Pismo, get rid of the politicians instead."
Scott Silvas	San Diego, CA	2019-07-03	"For my FriendCarl"
Spencer Gifford	Rancho Cordova, US	2019-07-03	"So many good times here"
David Grant	San Jose, CA	2019-07-03	"Pismo needs to stay open."
Tammy Graham	Sturgeon County, Canada	2019-07-03	"It's a beautiful place for families to make memories"
Josh Steele	Hoboken, NJ	2019-07-03	"California is so screwed up by all of the elected officials and this is just one more thing they want to take away from people and control everyone's lives growing up my family spent uncountable hours learning growing and enjoying each other on these dunes and that beach! Trying to take that type of experience away from the people of California is awful. Sierra club, pelosi and all the other clowns running the state need to kick rocks!"

Name	Location	Date	Comment
Charles Davis	Ewa Beach, HI	2019-07-03	"I am an avid offroad enthusiast stationed in California. This is how I meet people and see the truest parts of the area"
Kevin Pla	Las Vegas, US	2019-07-03	"Don't take away our only place in California for actual beachfront camping. �"
Jason Hester	Campbell, CA	2019-07-03	"Keep CA OHV parks open!"
Jazlyn Wood	Riverside, CA	2019-07-03	"Ever since I was a young child, my favorite off road memories were at this beach with these dunes. My first time learning how to ride a quad and drifting off into the ocean. That is something that I will never forget. Keep Oceano Open so my kids can experience the amount of excitement and being to off road and swim at the same time!"
Philip Silver	Anderson, US	2019-07-03	"If you restrict the activities that people are allowed to do on public land, there will be less people who care about preserving it."
John Jutzy	Boise, ID	2019-07-03	"Please research your candidates before you vote! So sad what has become of California!"
Justin Vaughan	Arlington, TX	2019-07-03	"I want to see more of road parks not less."
Matthew Ehler	Rancho Cordova, US	2019-07-03	"If they do end up shutting them down, the surrounding towns will lose out on so much business so many people have so many good memories here"
Christina Robledo	US	2019-07-03	"Everyone needs a place they can have fun riding with family and friends."
Robert Gold	Warrenton, VA	2019-07-03	"I love camping on the beach and riding 4 wheelers. I grew up in cape cod and have seen first hand what the government can do by seizing lands and restricting recreation activities definitely had an economic impact and impacted tourism as well. Also impacted quite a few family fortunes and had a negative economic impact as a whole. Please don't shut down the dunes. It would be a huge mistake"
Steve Meier	Seal beach, CA	2019-07-03	"Steven meier"
victoria kortlang	san diego, CA	2019-07-03	"Need open lands"
Alexis Vences	Santa Maria, US	2019-07-03	"Bonfires"
Shawn Rodriguez	Visalia, CA	2019-07-03	"I want our dunes back!!! I want to make more memories"
Brandon Lewis	Spring valley, CA	2019-07-03	"It's the right thing to do. Stop taking away our land"
Stephen Hajdu	Gilroy, US	2019-07-03	"It's a great place for families to go and spend time together. I've been going since I was a kid and now my kids are going. We're all contributing to the local economy."
Josh Foresyth	St. Louis, MO	2019-07-03	"Went in February and can't wait to go back. I'm from Missouri and I traveled up the coast of California, this was one of highlights for my wife and I. Please don't close it."

Name	Location	Date	Comment
Devin Pelphrey	Corona, US	2019-07-03	"I want to"
Erik Amos	Felton, CA	2019-07-03	"I am signing because closing our public lands is taking away our rights a tax payers. We pay for these lands and the services."
David Seat	Santaquin, US	2019-07-03	"Keep the dunes open."
Tim Ratican	Fallbrook, CA	2019-07-03	"Keep public land public. The coastal commission has overstepped their boundaries again."
Geni Kawamura	Lakewood, CA	2019-07-03	"Keep Pismo open!!!!"
Bart G	Pomona, CA	2019-07-03	"I used to come to pismo every year And I just had 2 kids. Can't wait for them to grow up and enjoy pismo like I did. We went for the first time since they were born this year and they had a blast."
Danika Winterburn	Shasta Lake, CA	2019-07-03	"They need to keep it open."
Jorge Morgan	Galt, CA	2019-07-03	"Favorite spot"
Merlin Wagner	Lompoc, CA	2019-07-03	"Should never be closed! More area needs to be open"
Michael Mcwilliams	Hesperia, CA	2019-07-03	"The dunes have been and need to always be, a recreational resource for all. Including the Offroad community."
Roger Bovee	Evanston, WY	2019-07-03	"I enjoyed the dunes when I lived in the area."
Valerie Ortega	Lakewood, US	2019-07-03	"I hope this doesn't happen! So many good memories the only place left in Cali you can ride on the beach and camp."
Glenda Jelks Gardenhire	Keller, TX	2019-07-03	"Love this place"
Duke Alspaw	De Queen, AR	2019-07-03	"I'm signing because places for us to get out on SXS and spend time with our kids is getting far and few between"
Michael Caetano	Phoenix, AZ	2019-07-03	"Its sand, stop the pettiness!!!!"
Jeff Palmer	Rancho Cucamonga, CA	2019-07-03	"It's a great place for family fun that should be kept open for generations to come!"
Raelene Chastain	Houston, US	2019-07-03	"I love it"
Andrew Holtzclaw	Walnut Creek, CA	2019-07-03	"I'm signing because I've been going to Oceano Dunes since I was a kid and it always been my favorite vacation spot to hear that they want to shut it down is just sad"
Thomas Payne	Corona, CA	2019-07-03	"This beach is a treasure that should be enjoyed, not preserved by locking it away."
Teri Munoz	El Paso, TX	2019-07-03	"Teri Lynn Muñoz"
Jeffery Darpli	Lemoore, CA	2019-07-03	"It's family thing!"

Name	Location	Date	Comment
Jack McCord	Seattle, WA	2019-07-03	"I Love The Outdoors and dont want it regulated to death."
Josh Jarvis	Safford, AZ	2019-07-03	"Dunes are a great place to ride."
David White	Sparks, NV	2019-07-03	"I grew up riding the dunes made me who I am"
Cole Preston	Yorba Linda, CA	2019-07-03	"Leftists don't need anymore of our OHV riding"
Eric Newell	Littleton, US	2019-07-03	"I support outdoor recreation with the likes of TDR."
Raymundo Vallejo	San Diego, CA	2019-07-03	"It's our right to have fun"
ТК	California	2019-07-03	"This is a staple of Pismo tourism, to take this away from the region would have devastating economic consequences to hundreds of businesses who rely on the foot traffic of visitors who come to enjoy this fantastic recreational areas. To say otherwise is an endeavor in virtual signalling without regard for the consequences to people's lives."
Nancy Gagne	Canada	2019-07-03	"These kids need a place to ride n keep them of the streets n farmers fields"
Gregory Mundy	Santa Maria, US	2019-07-03	"Please sign the petition. The local economy and business owners would be devastated."
Camron Brewer	Salt Lake City, UT	2019-07-03	"Don't shut it out"
Braydin Hildebrand	Pleasanton, US	2019-07-03	"The dunes is like a second home from all the problems and drama that's going on in this world or the circle that's around usthe dunes(Oceano dunes) is filled with good vibes and good people"
Jeff Collis	Vista, US	2019-07-03	"Just another example of the leftwing bureaucrats taking public land away from the public for off road recreational use. Keep Oceano Dunes open to ORV use!"
Michael Smolinski	Boise, ID	2019-07-03	"Mike Smolinski"
Joseph Herrera	Los Angeles, CA	2019-07-03	"It's such a shame that the focus on closing this wonderful OHV land is even a considerable opinion. Leave it open what ever small reamaining acres we still have!!"
Walter Perkins	Glendale, AZ	2019-07-03	"I like my outdoors"
Bobby Jeanblanc	La Habra, US	2019-07-03	"What did we do to deserve this?"
Faye Brigoli	Gardena, CA	2019-07-03	"Because to support"
Kendall Garcia	Compton, CA	2019-07-03	"This is a place where my family and I unite. Without it we are forced out of state to do anything similar. This will hurt the local community"
Brian Lewis	Milwaukie, US	2019-07-03	"Preserve our riding areas! OHV activities stimulate local economies and foster communities of diverse brotherhood and positive family recreation."

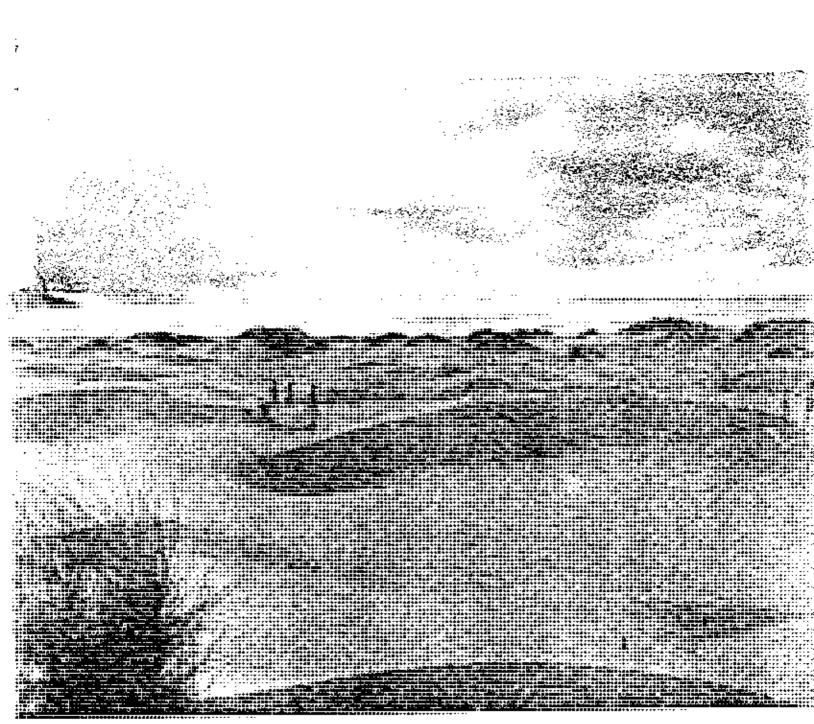
Name	Location	Date	Comment
Jacob Mitchell	Bakersfield, US	2019-07-03	"So much of my childhood was spent here. At least a month out of every year. This can't happen!!!!"
Craig DeMas	Nashville, TN	2019-07-03	"the great memories I have here"
Eddie Rubio	Santa Clarita, CA	2019-07-03	"This place represents happiness and fun to me and my daughter. I have been going to this place for over 20+ years. Ive brought my daughter up to ride motorcycles and enjoy the outdoors. And in todays society kids are stuck inside playing video games and have there noses stuck on you tube. Closing this place just stops kids from being outdoors and experiencing offroading and possibly keeping alot of kids out of trouble."
Josie Hawkins	California	2019-07-03	"I believe that a state park is suppose to be opened for the public to use this is why it is a park. If you close this park you are taking away the peoples right to use this park as a way to be connected to the land that we live on. It is more than just a piece of land that people use it is a tradition that has been passed down from generation to generation, it's a way for people to find time outside of the busy society to do something with the people that they love. Taking away the right for them to use this stare park is taking away their rights."
Shane Swarthout	San Diego, US	2019-07-03	"Beautiful place to play in the dunes"
Jareth Raymond	El Cajon, CA	2019-07-03	"No good can come from it"
David Fitzgerald	Huntington Beach, US	2019-07-03	"I believe in freedom."
Jacqueline Gutierrez	Pittsburg, CA	2019-07-03	"It's an amazing place"
teri cianconi	forest grove, OR	2019-07-03	"Teresa cianconi"
Mark Tarasco	Gilroy, US	2019-07-03	"Ending OHV in Pismo would devastate the local economy which largely depends on the tax revenues of visiting OHV enthusiasts."
Andria Mayfield	Antelope acres, CA	2019-07-03	"Andria mayfield"
Katti Fields	Torrance, CA	2019-07-03	"We must protect our parks!"
Jeff Beneck	San Diego, CA	2019-07-03	"Jeff bey"
Chet cox	Las Vegas, NV	2019-07-03	"Public lands are just that. They should remain open to the public for ALL to enjoy. The constant land grabs by environmental groups is becoming too much. It's continuing to cut off access to recreational use of all kind who enjoy the lands in many different ways. Quit stealing our land!"
Penny Munoz	San Antonio, TX	2019-07-03	"penny munoz"
Sharon Joseph	Oxnard, CA	2019-07-03	"We need this place to play!"
phillip silveira	San Martin, CA	2019-07-03	"the beach is for ALL people to enjoy. closing it to off roading will not solve the health issues. the wing will still blow. please do not punish the majority because a minority made a poor choice buying

Name	Location	Date	Comment
			in an area prone to wind carrying particulates off the ocean and dunes. The loss of revenue and jobs to the local economy will be devastating. With participation in offroading increasing and less areas to ride in, we need more areas to ride in to allow for this increase."
Lisandro Regalado	Escalon, CA	2019-07-03	"This will be sad if it closes, it where lots of people have fun!!"
Karen Chapman	Tulare, CA	2019-07-03	"We love these dunes !"
Donna Pare	Anaheim, US	2019-07-03	"Donna Pare"
Zeke Johnson	Los Angeles, US	2019-07-03	"I'm so sad, Pismo is an awesome place, but California is just turning into 3rd world country, I refuse to leave California but it's getting harder every day."
Cindy BRady	Vail, AZ	2019-07-03	"Riding is the best therapy in life"
Sophanara Kann	Long Beach, CA	2019-07-03	"Planning to go this summer, please don't shut it down"
leah valla	Placerville, CA	2019-07-03	"Don't let a few people ruin it for us all!"
richard keep	Henderson, NV	2019-07-03	"This is a fun place to bring family and have a good time"
Donald Robinson	Lompoc, US	2019-07-03	"The Dunes are a feature on California's appearance as the "smile" is to the Mona Lisa. Do not ruin Central California's one of a kind "Smile"."
Jordan Pellegrino	Simi Valley, US	2019-07-03	"We need local OHV land enjoy our cars and bikes on on the weekends and in our free time. M"
Jeffrey Lancial	Beaverton, US	2019-07-03	"This OHV area is truly unique and provides my family and many others an incredible place to make memories."
Tammy Tyler	Salem, AR	2019-07-03	"Tammy Tyler"
Teresa Munoz	US	2019-07-03	"Stop taking away our play areas."
David Mora	Yucaipa, CA	2019-07-03	"Trent is family"
Michael Dodson	Los Angeles, US	2019-07-03	"Love to camp on beach and ride in the dunes."
Linda Hagoort	Bakersfield, CA	2019-07-03	"The dunes have been a fun part of many peoples, families lives for many years. Why does everything enjoyable get taken away?"
Phil Abod	Riverside, CA	2019-07-03	"The residents ssns community want to keep if open"
Miriam Lopez	Wasco, CA	2019-07-03	"My family enjoys parking & relaxing there!"
Michelle McFarland	Gardena, CA	2019-07-03	"Pismo is a great family trip place"
Monica Fritz	Rancho Cordova, CA	2019-07-03	"Monica Fritz"
Lisa Cuellar	Escondido, US	2019-07-03	"Pismo is great vacation spot for my family"

Name	Location	Date	Comment
Isabel Ornelas	Madera, CA	2019-07-03	"I am signing this because it has been a tradition of ours to go with the family on all major holidays. Now that my kids, nephews, nieces are older they look forward to it."
jeremy clutinger	ramona, CA	2019-07-03	"This is Murcia!"
Stuart Collins	San Dimas, CA	2019-07-03	"Pismo Beach has been my family's vacation destination for decades, multi generations. Don't close Pismo!!"
ashley perez	westminster, CA	2019-07-03	"It's my family's favorite place"
Branden Hogg	El darodo hills, CA	2019-07-03	"Taking away our playground is absurd"
carlos brassel	Holbox, Mexico	2019-07-03	"Keep them open to the public"
Gwen Serrano	Tempe, AZ	2019-07-03	"Gwen Serrano"
Lenora Perri	Alhambra, US	2019-07-03	"Because I believe that the Dunes are part of family times together and it would be ashame to take such an experience away. The dunes is an awesome place to get children away from their phones and iPads and enjoy the out doors and spend family and friends active time together"
Dave McWilliams	Hesperia, CA	2019-07-03	"I want those open for future generations"
antonio olguin	Fontana, CA	2019-07-03	"It's a great location that has always been a destination for people world wide to ride the dunes and enjoy the beach"
Christina Guzman	Beaumont, CA	2019-07-03	"I want to keep Oceano dunes opens. We have been going over 15 years for family vacations!"
Geremy Reese	Anaheim, US	2019-07-03	"We need our off road areas left alone"
Peter Kim	Los Angeles, CA	2019-07-03	"I want the dunes to stay open for recreation and leisure."
Janessa Morrow	Bakersfield, US	2019-07-03	"i love going to the dunes its a family tradition. Id love for my children to experience the same"
Jalen Miller	Chicago, US	2019-07-03	"I live close to 2,000 miles away! I'd love to be able to go back there someday!"
Ryan Betts	La Habra, US	2019-07-03	"Save the dunes !!!"
Maria Sanchez	San Jose, CA	2019-07-03	"it's been a tradition since I was young & now that I have my own son we take him every year and he loves it"
Mackenzie Paz	Redlands, US	2019-07-03	"All of a sudden there's issues with where we ride! People realize shutting this shit Down is only going to cause more issues in the streets! Leave our fun spots alone!!!!!! Pleaseee"
James Miller	Healdsburg, CA	2019-07-03	"Its America and we should have more freedom, not less.Lots of great memories here, and hopefully more to come."
Jason Burke	Yuma, US	2019-07-03	"Save the dunes!"

Name	Location	Date	Comment
Colby Dolan	California	2019-07-03	"I want change"
Morgan Register	Fort Worth, TX	2019-07-03	"I encourage the use of off-roading."
Javier Valdez	Vacaville, CA	2019-07-03	"Save the dunes!!"
Dennis Fuller	Hemet, CA	2019-07-03	"I don't want anymore riding spots closed."
Gary Morris	Las Vegas, NV	2019-07-03	"I say keep it open!!"
Erik Anderson	Van Nuys, US	2019-07-03	"The more areas you close off more and more riders are prone to crashing due to small riding areas with bigger groups of people not knowing where to go"
Matt Sanders	RANCHO Cucamonga, CA	2019-07-03	"My family and I love to enjoy pismo beach riding"
Alex Valdez	Fresno, US	2019-07-03	"Our American rights to keep the beaches open"
Cole Dawson	Riverside, CA	2019-07-03	"The california government is a joke"

# DIMO STATE BEACH and and DIMO DUNES STATE VEHICULAR RECREATION AREA GENERAL DEVELOPMENT PLAN AND RESOURCE MANAGEMENT PLAN



Pismo State Beach and Pismo Dunes State Vehicular Recreation Area

GENERAL DEVELOPMENT PLAN AND RESOURCE MANAGEMENT PLAN April 1975

Edmund G. Brown Jr. Governor State of California Claire T. Dedrick Secretory for Resources

Herbert Rhodes
Director
Department of Parks and Recreation



State of California — The Resources Agency Department of Parks and Recreation P. O. Sox 2390 Sacramento, California 95811

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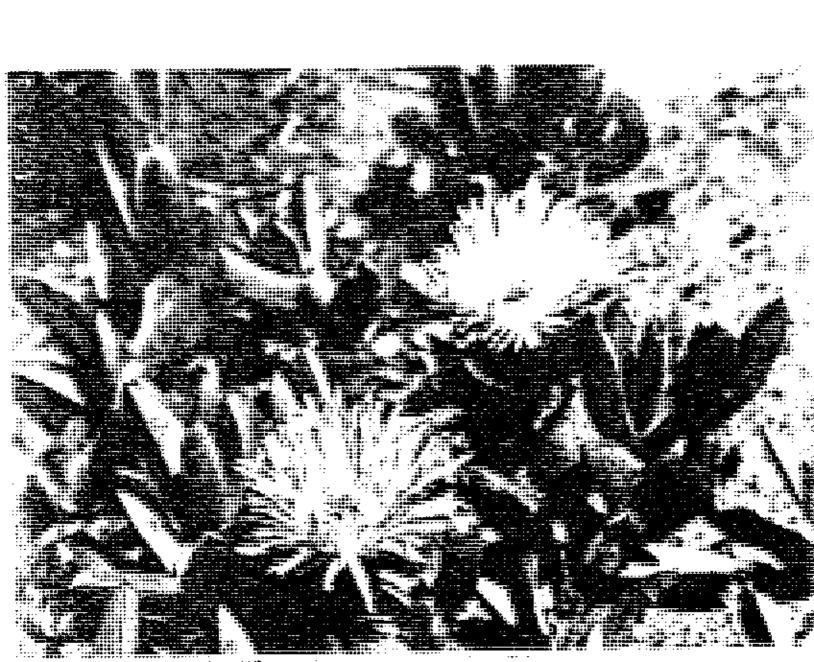
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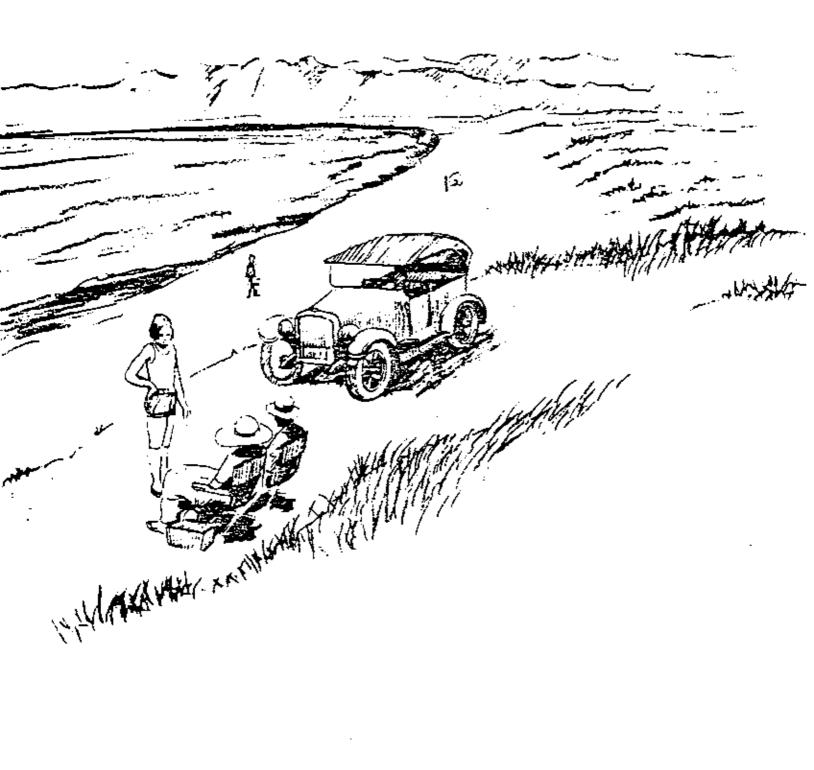
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# INTRODUCTION





### Pian Purpose

Forty years have passed since the State of California first acquired lands for recreational purposes at Pismo State Beach. During this period of time, millions of visitors from all sections of California have enjoyed this magnificent beach. In 1934, when this unit was first established, the population of California was approximately 6 million; today the population of this state approaches 21 million. This population growth, plus significant changes in travel and recreation trends, has resulted in tremendous pressures on all of California's public beaches in general and on Pismo State Beach in particular.

Overcrowded conditions reach their peak at Pismo State Beach and at Pismo Dunes State Vehicular Recreation Area during the major summer holidays, when tens of thousands of people converge in pursuit of diversified recreational experiences. These overcrowded conditions have resulted in problems involving conflicts of recreational use, congestion, safety, and health. Therefore, one purpose of this plan is to recommend an immediate course of action to remedy these

existing problems.

However, a second and no doubt more important purpose of this plan is to provide Pismo State Beach and Pismo Dunes State Vehicular Recreation Area with a document that will guide the growth and management of resources well into the future. In addition, the plan will serve as an informational document for the public, the Legislature, the California Coastal Zone Conservation Commission, and local planning entities. Once approved, the plan will be subject to review and updating by the State Department of Parks and Recreation.





FIGURE 1 LOCATION MAP

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### Plan Format

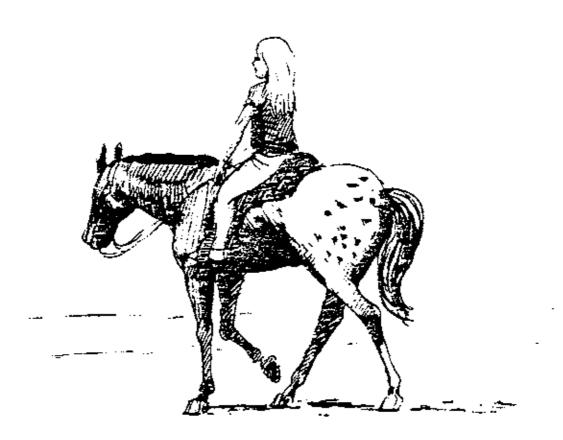
The Public Resources Code provides that after each unit of the State Park System is classified, the Department of Parks and Recreation must prepare a general development plan and resource management plan for that unit. The Department must then submit the plans to the State Park and Recreation Commission for approval. It is the responsibility of the commission to schedule a public hearing to consider such approval.

In the case of Pismo Beach, there are two plans that have been reviewed by the commission and the public: one plan for Pismo State Beach and the other for Pismo Dunes State Vehicular Recreation Area. These areas are contiguous, and consideration of either plan requires an understanding of the total proposal encompassing the two individual units of the State Park System.

For this reason the two plans have been included under a single cover.

On February 27, 1975, the California Coastal Zone Conservation Commission, South Central Coast Region, conducted a public hearing to consider this plan. The regional commission approved the plan at that meeting, and the terms and conditions of the approval appear in the appendix to this publication.





### Summary of Recommendations

The recommendations included here provide for prompt correction of existing problems and conflicts involving land use, beach congestion, sanitation, and law enforcement.

More specifically, the recommendations provide for:

- Controlled vehicle access
- Reduction in vehicle traffic on the beach primarily through:
  - a. Development of new access to dunes
  - Development of off-beach parking
  - Reduction in beach camping densities
  - d. Conversion of one mile of beach to play beach with nonvehicular use
- 3. Continuity in administration of recreational lands

The recommendations provide the means by which long-range recreation needs can be met and by which highly diversified recreational activities, both active and passive, can coexist without negative effect on environmental qualities or visitor enjoyment.

Through the acquisition of private and public lands, it is recommended that Pismo State Beach be increased from 1,090 acres to approximately 1,270 acres and that Pismo Dunes State Vehicular Recreation Area be increased from 810 acres to approximately 2,940 acres. This would provide a total of eight and a half miles of magnificent beach frontage and approximately 4,200 acres with outstanding sand dunes, freshwater lakes, uplands, marshes, and lagoons with a variety of vegetation and wildlife.

For public enjoyment as well as educational, scientific, and interpretive purposes, the plan recommends the acquisition and preservation of sites containing archeological values and areas that contain significant natural and scenic qualities.

The plan recommends the development of specific support facilities necessary for access, sanitation, safety, administration, and visitor enjoyment of state beach and state vehicular recreation area lands.

For the protection of environmental quality and visitor enjoyment, it is recommended that recreational capacities and use patterns be carefully monitored and studied. Recreational use standards, including carrying capacities, should be modified according to the findings of such studies.

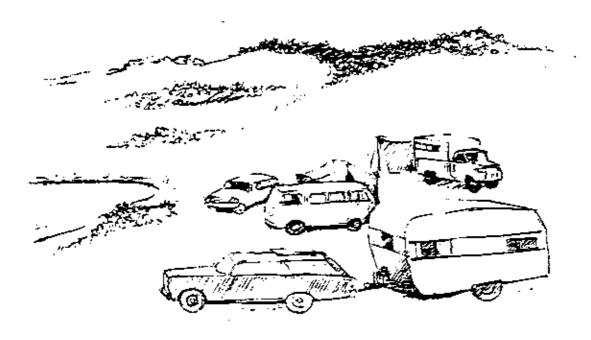
Recommendations contained within this plan provide for the following recreational use and facilities.

### **Bicycling and Hiking**

- Three miles of paved bicycle trails plus three miles of hard sand beach suitable for bicycle riding
- 2. Twelve miles of hiking trail
- Hostel for bicyclists and hikers
- Hike-in campground for bicyclists and hikers.

### Horseback Riding

- 1. Nine miles of equestrian trail
- Two equestrian staging areas for parking trailers and unloading horses.



### Vehicular Beach Touring

Six miles of hard sand beach for automobile touring

### Camping

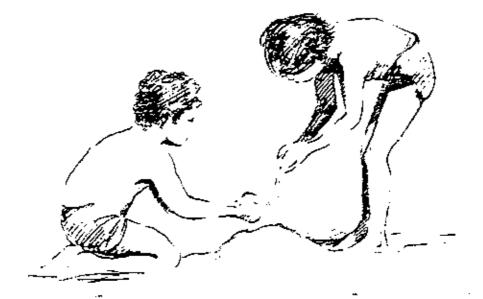
- 1. Oceano and North Beach campgrounds for tent and trailer camping
- 2. Initially three hundred and twenty, eventually to be reduced to two hundred, primitive beach camping units on the firm sand above high tide

### Beach Play (Nonvehicular)

- 1. Two miles of beach for day use without automobile traffic
- 2. Parking areas adjacent to the day-use beach

### Picnicking and Other Day Use

- 1. Picnic areas
- 2. Nine-hole golf course, clubhouse, and concession-operated restaurant





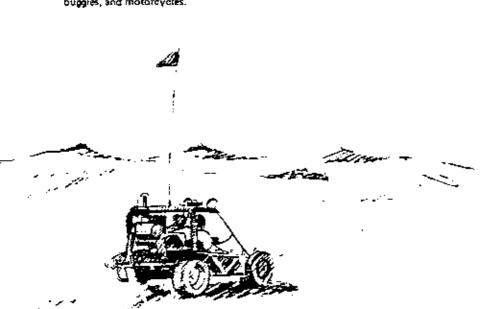
### Fishing and Clamming

- 1. Fourteen acres of freshwater fishing
- 2. Eight and a half miles of clamming and fishing beach
- 3. Public fishing pier
- 4. Fishing tackle rental and bait shop (on pier)

### Off-Highway Vehicle\* Recreation

- 1. Two thousand acres of sand dunes for off-highway vehicle recreation
- 2. Primitive camping facilities for dune vehicles
- 3. Inland camping area for off-highway vehicle users
- 4. Vehicle association center with administration facilities for off-highway vehicle recreation
- Concession-operated facilities for dune vehicle service, rental, and storage and food service
- 6. Operation center with information and first aid facilities
- The term "off-highway vehicles" as used in this report, refers to whealed vehicles
  designed to travel in the sand dunes. This includes four-wheel-drive units, dune
  buggies, and motorcycles.





### Nature Study and Photography

- 1. Dune preserve of 570 acres
- 2. Oso Flaco and Jack Lakes natural areas, which consist of 800 acres
- 3. Forty-acre dune arboretum
- 4. Hike-in campground in the Oso Flaco Lakes natural area
- 5. Facilities to interpret the lakes and dune ecology
- 6. Interpretive dune and beach vehicle to transport park visitors along the beach



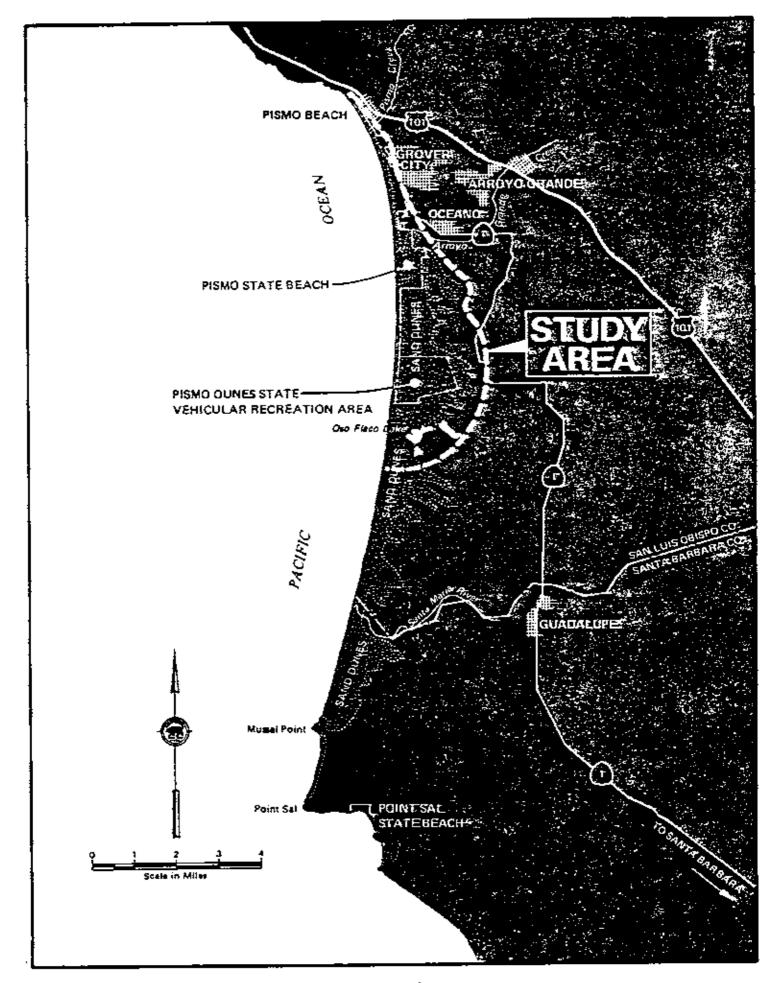


FIGURE 2 STUDY AREA

### Area of Study

Pismo State Beach and Pismo Dunes State Vehicular Recreation Area are located in San Luis Obispo County on the ocean side of Pismo Beach and Grover City and extending downcoast for approximately seven miles. Access to this area is from U.S. Highway 101 and State Highway 1.

Pismo State Beach and Pismo Dunes State Vehicular Recreation Area lie within the crescent shaped coastal strip that stretches from Point Sal on the south to the City of Pismo Beach some 17 miles to the north. The State Department of Parks and Recreation has long recognized the potential of this coastal strip and accompanying upland for open space and recreation.

If the problems and conflicts at Pismo State Beach and Pismo Dunes State Vehicular Recreation Area are to be resolved by long-range planning, such planning must extend beyond the present state ownership. For the purposes of this study, a comprehensive planning unit is considered the north half of the Point Sal-Pismo Beach coast front and the reach between the City of Pismo Beach and Oso Fiaco Lake eight and a half miles to the south.

This comprehensive approach provides the Department an opportunity to resolve problems in a logical, manageable planning unit. The north end of the study area consists primarily of Pismo State Beach lands, which are bounded by the shoreline of the Pacific Ocean on the west and the urbanized communities of Pismo Beach, Grover City, and Oceano on the east. Lands surrounding Pismo Dunes State Vehicular Recreation Area on the south end of the study area are primarily undeveloped or agricultural properties.

Primary natural features within the study area include:

- 1. The beach
- 2. Marsh and lagoon areas behind the beach on the north
- 3. The vast area of sand dunes on the south
- 4. Fresh water lakes within the stabilized dunes of the Dune Lake Properties
- 5. The Oso Flaco Lakes area surrounded by fragile dune and marsh lands

Primary land use and development either within or near the study area include:

- 1. The urbanized communities on the north-
- 2. The Southern Pacific Railroad
- The Union Oil Company refinery to the south.
- 4. State Highway 1, immediately east of the study area, and U.S. Highway 101 further inland.
- Agricultural lands in the Cienega and Santa Maria valleys.
- 6. Undeveloped and unaltered lands

Major property owners within the study area include:

- State of California
- County of San Luis Obispo.
- Dune Lake Properties, Ltd.
- 4. Pacific Gas & Electric Company
- Union Oil Company.
- Santa Maria Valley Associates

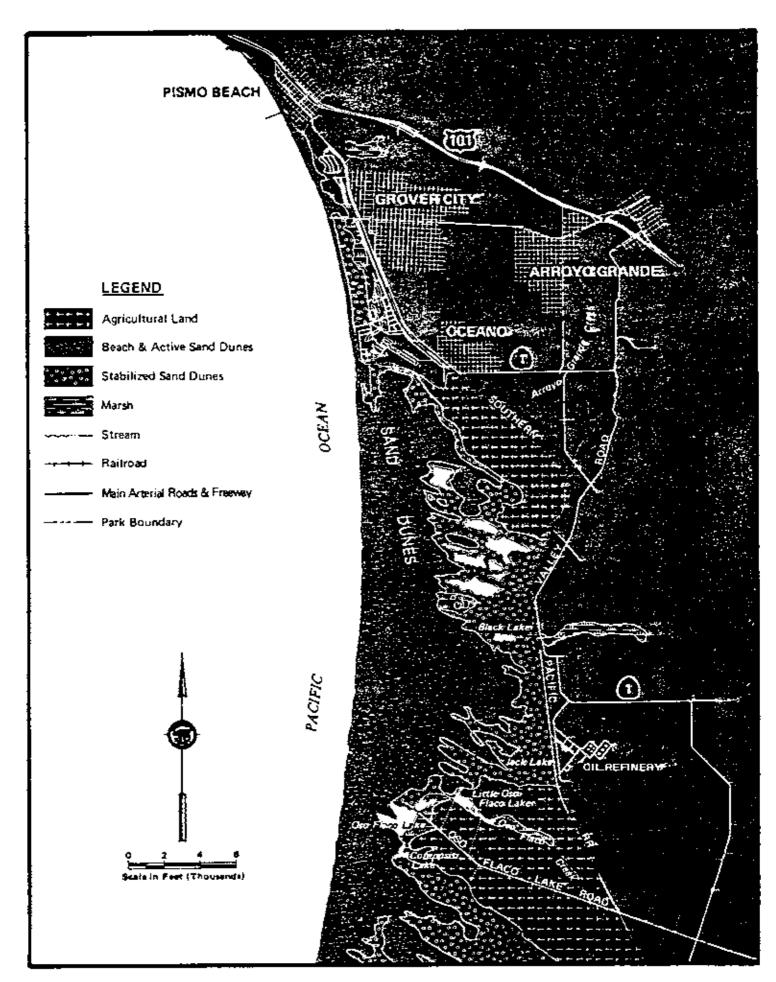
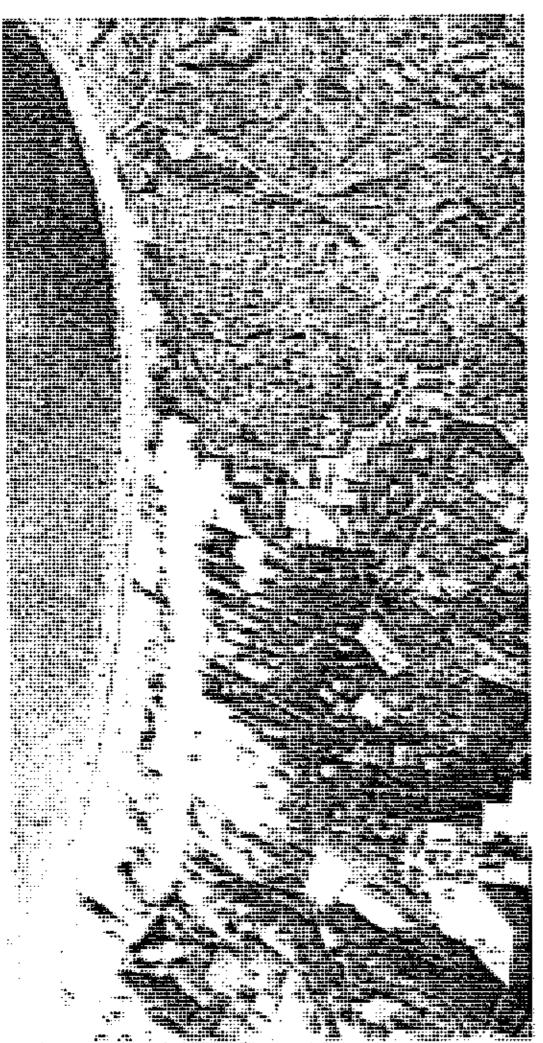


FIGURE 3
PHYSICAL CHARACTERISTICS



# EXISTENS SITUATEDN



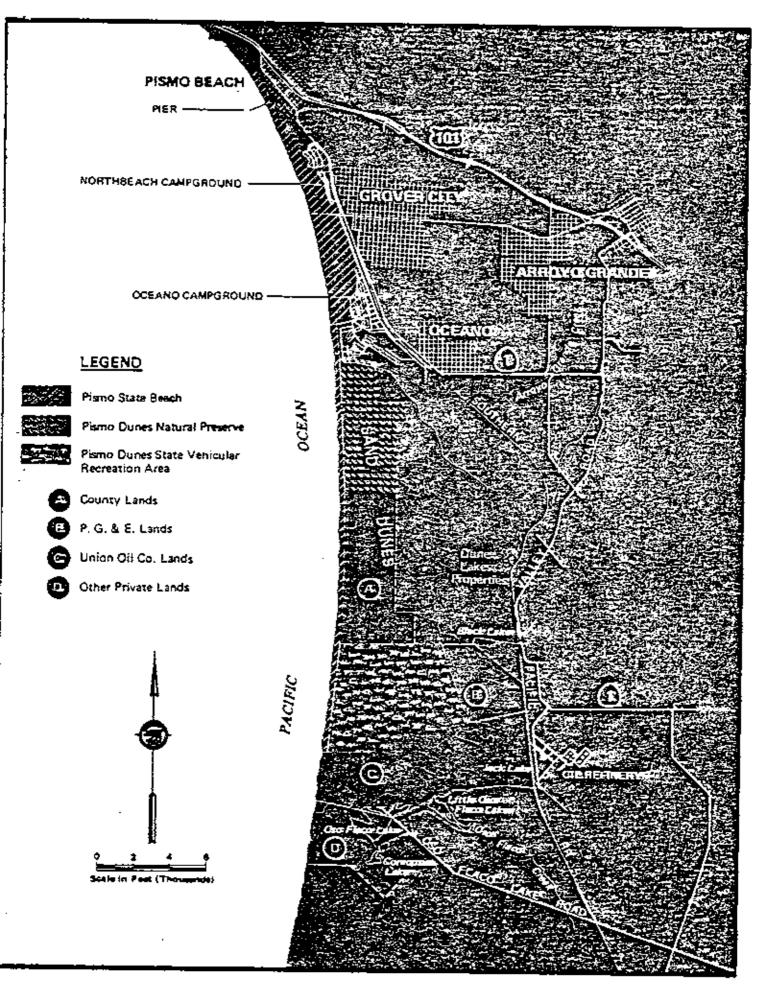


FIGURE 4

### Acquisition and Classification

### Acquisition

Pismo State Beach and Pismo Dunes State Vehicular Recreation Area today comprise a total of 1,902 acres. Following is a brief history of this acquisition.

- 1934 Original park acquisition 140 acres. Oceano Campground, completed in 1947, is located on this original plot.
- 1949 Pismo Beach Pier acquired from the county and negotiation undertaken to acquire land adjacent to the pier.
- 1951 Beach area immediately north and south of the pier acquired. This comprises the nonvehicular day-use area of Pismo. This area is 72 acres in extent.

Also acquired in 1951 was a 53-acre parcel known as Pismo Oaks Estates, Incorporated. This area is now occupied by North Beach Campground, which was constructed in 1963.

- 1958-64 Continuing program of acquisition of the small parcels contained within the Halcyon and La Grande subdivisions. This is the present Dunes Natural Preserve Area.
- 1974 Acquisition of an 847-acre parcel from PG&E. The state's intent in this acquisition is to retain its use as an area for off-highway vehicles.

### Classification

Units of the State Park System are classified by the State Park and Recreation Commission in accordance with the guidelines established in the Public Resources Code and Title 14 of the California Administrative Code. The classification process was legislatively mandated to ensure that the natural resource values of the proposed park are identified and that the park classification will guarantee proper management of these resources.

State Park System lands at Pismo Beach have been classified under three different unit

classifications:

- Plsmo State Beach, as classified by the California State Park and Recreation Commission in September, 1962, involving 1,050 acres, derives its classification from its natural physical qualities and from guidelines established by the State Department of Parks and Recreation.
- Outstanding sand dunes within Pismo State Beach have recently been classified as Pismo Dunes Natural Preserve. This is a 430-acre subunit within Pismo State Beach. The Natural Preserve contains many fine examples of undisturbed sand dunes and native vegetation. Classification as a natural preserve guarantees that this area will be protected from adverse uses.
- The Pismo Dunes State Vehicular Recreation Area, comprising 810 acres at the southern and of the state ownership, was classified by the commission on July 12, 1974. While vehicular use is restricted to designated routes of travel in the state beach and is prohibited in the natural preserve classifications, it is permitted in designated areas within the Pismo Dunes State Vehicular Recreation Area. This area has been acquired for the recreational use of dune buggies and similar off-road vehicles.

### Administration of Lands

Recreation lands associated with Pismo State Beach and Vehicular Recreation Area are essentially owned or administered by five different entities. For the most part visitors pass from one property to the other without being aware of this multiple ownership. The five entities are:

- 1. California State Department of Parks and Recreation
- 2. California State Lands Commission
- 3. County of San Luis Obispo
- 4. City of Pismo Beach
- 5. Private property owners

(See Administration of Lands Map, page 19.)

The California State Department of Parks and Recreation is responsible for the stewardship of Pismo State Beach; the beach subunit, Pismo Dunes Natural Preserve; and Pismo Dunes State Vehicular Recreation Area.

Subtidal jurisdiction is presently vested in the California State Lands Commission. To minimize public confusion in the enforcement of rules and regulations and to carry out its own charge properly, the Department of Parks and Recreation has made formal application for the control of this zone along the beach frontage.

The County of San Luis Obispo administers lands in the sand dunes between the dunes preserve and the Vehicular Recreation Area. The county also leases some private land for recreational purposes in the Oso Flaco Area. The county lands are essentially used for off-highway vehicle recreational use.

The City of Pismo Beach, under agreement with the county and the state, operates and maintains the northern one mile of beach and accompanying support facilities.

Certain major private property owners in the sand dunes have permitted off-highway vehicle recreational use on their lands. Some of this use has been agreed to under a lease or easement arrangement with off-highway vehicle groups and the county. Major owners in this area are Union Oil Company, PG&E, and the Santa Maria Valley Associates. The privately owned Dune Lakes properties in this area are primarily stabilized dunes; off-highway vehicle recreation use in this area is therefore in conflict with private land management principles. The boundaries of the Dune Lakes properties are marked, and trespassing is prohibited.

### Public Facilities

### Camping

There are presently two developed inland camping areas and one beach camping area.

- 1. Oceano Campground is located off the beach approximately two miles south of the community of Pismo Beach. It is bordered by Coast Highway 1 on the east and by the beach on the west. There are 82 developed campsites, 42 of which have water and electric hookups for trailers.
- 2. North Beach Campground is located about one-quarter mile south of the community of Pismo Beach. It has 103 campsites and is located about one-quarter mile inland from the beach.
- Beach Camping is permitted on the hard sand in four designated areas south of Arroyo
  Grande Creek. Chemical toilets are provided at intervals along two and a half miles of
  beach. The beach camping area is designed to accommodate a maximum of 320 units.

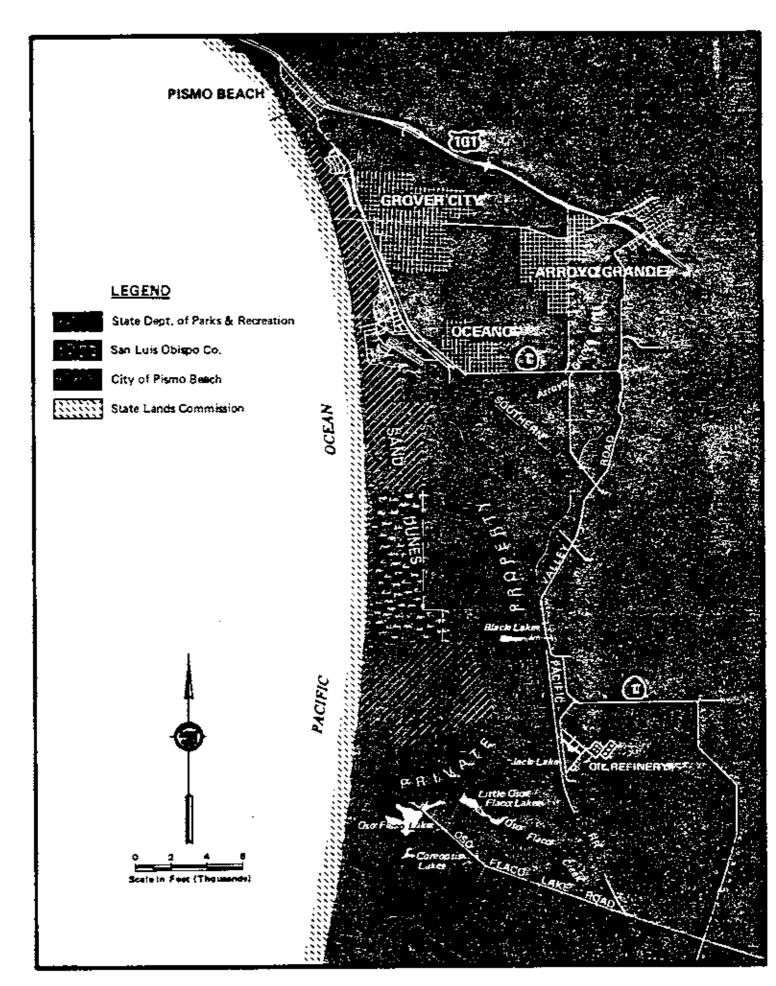


FIGURE 5
ADMINISTRATION OF LANDS

During the past year there has been considerable controversy over the continuation of beach camping. This is discussed in some detail under the section dealing with existing problems (p. 27).

### State-Operated Day-Use Facilities

In 1974 two large modern comfort stations were constructed at Pismo State Beach. One comfort station is located at the foot of Grand Avenue, and the other is located about one mile south at the foot of Pier Avenue. No day-use facilities are provided in the vehicular recreation area.

### Concession-Operated Facilities

On the northern end of the beach, the Pismo Beach Pier connects to a public parking area in the City of Pismo Beach. Under agreement, approximately one mile of the northern end of the state beach is operated by the city. In connection with the pier and beach frontage, the city contracts to concessionaires for the operation of a snack bar, a bait and tackle shop, and a mobile home park that will accommodate trailers, motorhomes, and campers for overnight use. The city maintains restrooms and a lifeguard facility on the pier.

The operating agreement for this section of the beach is actually between the County of San Luis Obispo and the state. The county and state have jointly subleased this property to the City of Pismo Beach. The agreement expires August 7, 2000.

Immediately adjacent to Grand Avenue and the state beach, and on the north side of the avenue are a restaurant and a nine-hole golf course. These facilities are under concession contract to the Le Sage Enterprises until December 31, 1975.

### Administrative Facilities

Employee housing and maintenance facilities necessary to the operation and protection of facilities and natural resources are located adjacent to Highway 1 about one-half mile north of Pier Avenue.

### Fees

With the exception of free day use, the fee structure at Pismo State Beach and Pismo Dunes State Vehicular Recreation Area is the same as that found throughout the State Park System.

Camping. There is a \$3 charge for the use of overnight camping facilities without trailer hookups at both the North Beach and Oceano Campgrounds; a fee of \$4 is charged for a limited number of campsites at Oceano that are equipped with trailer hookups. A fee of \$1.50 is charged for the more primitive camping that is allowed on specified areas of the beach. An extra fee of \$0 cents for dogs and \$1 per additional vehicle (excluding additional off-highway vehicles) is charged at all the camping areas.

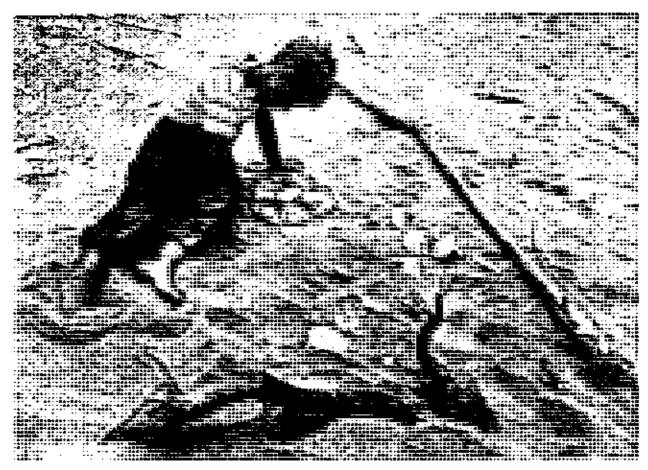
Day use. There is no charge for day use. A great amount of pressure has been exerted on the State Department of Parks and Recreation by local citizens and the Department of Fish and Game to continue a no-fee day use policy at Pismo. Recent meetings with the Technical Planning Committee and the Citizens' Advisory Committee have indicated that these two local advisory groups are also in favor of retaining free day use at Pismo.

### Attendance

While annual visitor attendance figures for Pismo State Beach reflect the patterns of attendance during the various seasons, the figures for day use and overall attendance are not completely reliable. This is because of the difficulties involved in making accurate counts during periods of high use. This is a large beach area with uncontrolled access. During periods of intensive use there is a continuous flow of traffic onto and off the beach. Vehicles flow through the state beach onto private beach and dune recreational lands to the south and vice versa.

Despite the unknowns, there are some things we do know about the attendance:

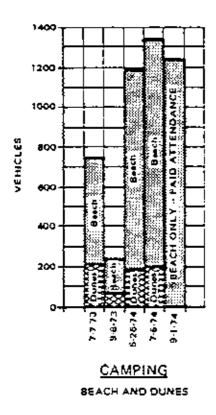
- Pismo Beach is among the most popular units of the State Park System with an annual attendance of more than two million visitors.
- 2. There are relatively few days in the year when the beach becomes overcrowded. During the clamming tides the beach becomes crowded with both vehicles and people. In recent years the beach has become seriously overcrowded with vehicles and people on three holidays Memorial Day, the Fourth of July, and Labor Day.
- 3. Many reported figures of attendance on the beach and in the dunes during the peak periods of use on the major holidays have been highly exaggerated.
- 4. Available attendance figures and observations of park personnel indicate that in recent years there has been a leveling of attendance. Use during the major holidays is not increasing and may be slightly decreasing, whereas use during other seasons of the year, normally off seasons, is increasing.
- 5. The greatest number of "walk-in" visitors use the beach north of Grand Avenue. This is because of the proximity of this beach to public and private campgrounds as well as to motels.

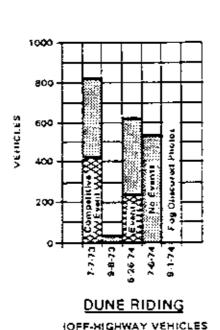


### FIGURE 6

### INSTANTANEOUS COUNT AND DISTRIBUTION OF VEHICLES

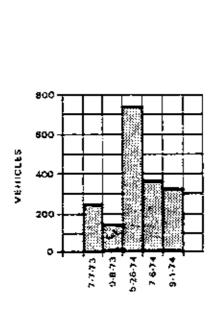
(Count made from aerial photographs, that covered the 8.5 miles of beach and dunes between the community of Pismo Beach and Oso Flaco Lake)

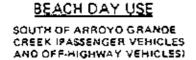




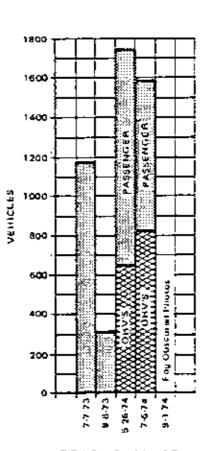
IN OUNES!

7-7-73 — 4th July Weekend 9-8-73 — Admission Day Weekend 5-26-74 — Memorial Day Weekend 7-6-74 — 4th July Weekend 8-1-74 — Labor Day Weekend



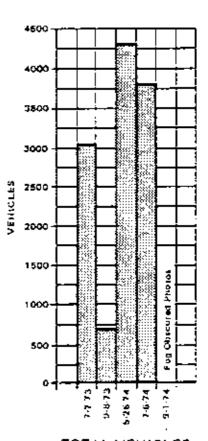


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NORTH OF ARROYO

NORTH OF ARROYO GRANDE CREEK (PASSENGER VEHICLES



TOTAL VEHICLES

BEACH AND DUNES
(ALL TYPES)

In long-range planning for an existing unit of the State Park System, it is important to know the current numbers and distribution of persons and vehicles during times of peak use. This information is normally derived from aerial photographs taken at the peak use times. Figure 6 reveals the instantaneous count and distribution of vehicles on state, county, and private beach and dune lands within the study area. The chart was compiled from aerial photographs taken in 1973 and 1974.

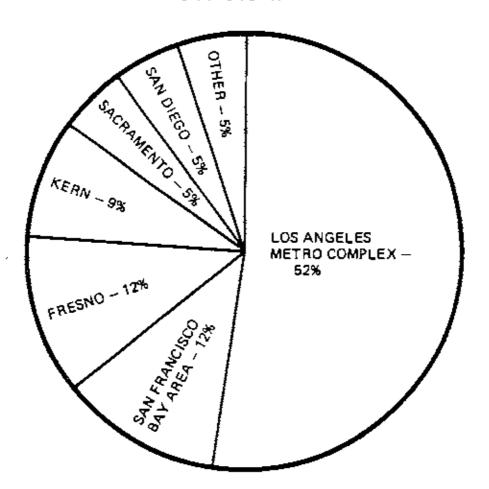
(See Area of Study Map, page 11.)

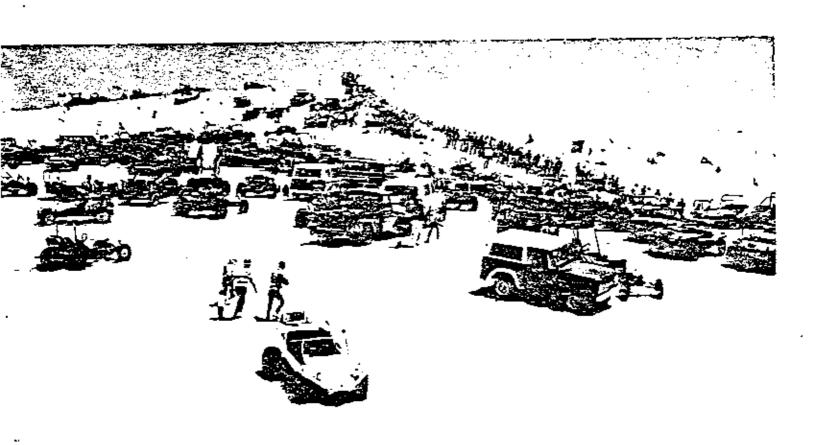
During the 1973 summer season, 76 percent of the upland campsites were filled. On summer weekends 92 percent of the sites were filled. On holidays all available campsites were filled.

The origin of these campers is shown in Figure 7. The figures are from 1973 Ticketron and 1969 RecTIP information.

Major recreation demand at Pismo is from the Los Angeles area. The south central portion of the state, including Fresno and Kern counties, is next in visitor demand with less than one-quarter the demand.

FIGURE 7
ORIGIN OF VISITORS TO PISMO STATE BEACH





### Recreation Use Patterns

### Beach Use

The beach at Pismo is unique because its hard surface supports vehicle travel during all seasons of the year. Beach touring is a rare and memorable outdoor recreation experience that attracts people from all parts of the country. Nowhere else in California can one enjoy the thrill of driving for miles on the natural sand beach with the surf breaking just a few yards away. This has always been among the most popular activities on the state beach. On major holidays, vehicles are stretched bumper to bumper for five or six miles along the beach.

Digging for the famous Pismo clam is also among the most popular beach activities. During the

clamming tides thousands of people enjoy this popular and sometimes productive sport.

Beach camping rates among the most popular recreation activities. Vacation trailers, motor homes, campers, and a few tents line the beach south of Arroyo Grande Creek during the major holidays. This is the only place along the 1,072 miles of California shoreline where natural conditions afford the opportunity for "drive-on-beach camping." This is an informal type of overnight use without the limitations imposed by roads and parking spurs.

Other popular beach recreational activities include fishing, swimming, wading in the surf, beach combing, surfing, sunbathing, sand play, beach sports and games, strolling, sightseeing,

jogging, and horseback riding.

These diverse activities attract a number of persons who converge on the beach in recognized patterns of recreational use. The northern mile of beach with adjacent parking areas is used exclusively for typical beach activities: swimming, beach play, sunbathing, and the like. Vehicles are not allowed in this area. On the remaining seven and a half miles of beach in the study area, typical beach activities are enjoyed with vehicle access and parking on the beach. Two and a half miles of beach south of Pier Avenue serve as the principal entry route into the sand dunes.

### **Dunes Use**

The beach that extends some 17 miles south to Point Sal serves as the gateway to a vast and beautiful system of sand dunes. Off-highway vehicle enthusiasts enjoy a variety of recreation activities in this area. Dune touring; competition events, such as drag racing and hill climbing; and primitive camping in the dunes are the most popular activities. Dune touring is not confined to just daylight hours — with headlights and whip antennas marked with a warning light, skilled vehicle operators safely cruise throughout the night.

The dunes also serve other recreational pursuits. Among these are hiking, horseback riding,

nature study, fishing (in freshwater lakes), hunting, and photography.

Passive enjoyment of the dunes involves pleasure derived from observation of and identification with the unspoiled natural beauty. The undisturbed active dunes within the dune preserve area supply much of this experience, although such activities are not confined exclusively to the preserve. Frequent hikes in the dunes are scheduled by the Sierra Club and other groups. Popular areas for these hikes are the Dunes Natural Preserve, Oso Flaco and Jack lakes, Coreopsis Hill, and vegetated dunes south of Oso Flaco Lake.

### inland Use

The primary recreational use of the inland state beach property is camping. There are two developed public campgrounds within one-quarter mile of the beach at Pismo State Beach. In recent years the private sector has developed many recreational vehicle campgrounds in the area, most of which are within one mile of the beach. Obviously, these public and private camping areas serve a major portion of the beach and dune day users.

Also within the state beach on the inland property is the golf course, which is used by both

local citizens and park visitors.

### Access and Circulation

Vehicle access to the state beach and to the vehicular recreation area is primarily via one of three streets that are ramped onto the beach. On the north, at the City of Pismo Beach, is Ocean View Avenue Ramp. One mile south is the Grand Avenue Ramp, and approximately another mile south is the Pier Avenue Ramp. Reportedly, Pier Avenue Ramp receives 80 percent of the use during peak periods. During periods of high tides the ramps become unusable.

Some off-highway vehicles enter the vehicular recreation area across private lands from the Oso Flaco Road, approximately five miles south of the Pier Avenue Ramp. Oso Flaco Road is a county and the second 
road that terminates at Oso Fiaco Lake, about a half mile from the beach.

Walk-in access to the beach is primarily along the northern urbanized section, where numerous motels and private and public campgrounds contribute to beach use.

### Problems and Conflicts

### Unit Identity

Pismo State Beach and Pismo Dunes State Vehicular Recreation Area are not readily distinguishable units. First-time visitors and even many "old timers" are not aware of when they are entering or leaving these units. The location of the "park" headquarters is not apparent, and lack of adequate control prevents distribution of information on rules and regulations and on things to see and do. As a result of this, the visitor's enjoyment is lessened, and operation and enforcement problems are increased.

### Control

Access to the beach has generally been uncontrolled. There are six points of vehicle access to the state beach, two of which are controlled access points to inland campgrounds. As a means of controlling beach camping density, two control stations were recently placed in streets leading to the beach. These are temporary stations used only during the beach camping season. Beach camping conditions were improved as a result of these contact stations; however, there still remains a problem of beach control.

In the past local citizens have vehemently opposed control or information stations because they believe the stations are the first step toward the initiation of a day-use fee for beach access. Since several of the streets are the property of local communities, their cooperation is needed in the control of beach access.

The problems that result from lack of beach control are twofold. First, it is virtually impossible to control density when access cannot be controlled. Second, law enforcement problems increase as access control decreases.

### Management Continuity

Four different public agencies now administer recreation lands at Pismo Beach. This is inefficient and costly to the taxpayer. It is also confusing to the public and only adds to the problems of law enforcement jurisdiction, boundary demarcation, and private property trespass.

### Vehicle Circulation

In addition to the problems caused by numerous accesses to the beach, there is one serious problem involving vehicle circulation. The primary vehicle access to the Pismo Dunes State Vehicular Recreation Area is the beach; consequently, vehicles travel a distance of from two to four miles southward on the beach to the sand highway that leads into the dunes. During periods of peak use, this heavy vehicle travel conflicts with other beach uses. The problem is aggravated as vehicles from the dunes travel back and forth over the beach to the gasoline, food, and beverage supply centers to the north.

Competition for recreation land. Because of the popularity of beach recreation, a conflict is developing over exclusive land use. Each interest group (i.e., equestrians, clammers, fishermen, dune buggy operators, and sunbathers) feels it has the right to enjoy its own special form of beach recreation as long as it does not interfere with another group's enjoyment of the beach. Today, however, this is rarely possible. The large numbers of persons visiting Pismo Beach often unknowingly spoil other beach users' enjoyment. Dog owners frequently offend sunbathers and beach walkers. Vehicle users conflict with equestrians and pedestrians. Campers use space desired by some day users. Although individuals do not intentionally attempt to interfere with other people's enjoyment of the beach, they nevertheless do, and consequently, the number of complaints registered with the park rangers increases every year. Two specific problems that relate to this subject deserve further mention here.

Beach camping has been the subject of considerable controversy during the past year. On July 10, 1974, the California Coastal Zone Conservation Commission issued an emergency permit allowing beach camping to continue until December 31, 1974. One condition of this permit provided that a long-range plan for the development and operation of camping and day-use areas at Pismo State Beach and a schedule for carrying out that plan be submitted to the commission by the State Department of Parks and Recreation before December 31, 1974.

The principal conflict is between those who believe that the portion of beach between the Pacific Ocean and the toe of the first line of dunes should not be dedicated to a single purpose use and those who believe that the dedication of a segment of the beach to camping is reasonable because nowhere else does the opportunity exist to enjoy this type of beach camping.

Camping on the beach has long been popular at Pismo Beach. This popularity has grown over the years and, when coupled with the skyrocketing use of motorhomes, campers, and vacation trailers, has developed into a serious problem. Because of the uncontrolled access to the beach, camping on the three major holiday weekends has far exceeded the capacity of the beach, and the result is vehicular congestion as well as potential health and safety hazards. There is general agreement that if beach camping is to continue, it should be allowed only in designated areas, and these areas should be limited to low densities.

The Department of Parks and Recreation has recently developed an "Interim Use Plan," which deals with immediate measures to correct the problems connected with beach camping. With the cooperation of several local communities this last summer, control stations were placed at two locations leading into the beach. Local off-highway vehicle groups have helped through an information program dealing with the necessity of curtailing camping use. A fee has been placed on beach camping, and reservations through Ticketron are required. Progress in reducing the number of beach campers during peak use periods is being made.

A problem somewhat similar to the beach camping controversy is beginning to develop on the north end of the beach. This involves approximately two miles of beach frontage. The northernmost mile of beach has been traditionally used for beach play with vehicle use prohibited. Pressure for more space for beach play during the summer months is now having an impact on the downcoast mile of beach. This pressure is generated by the increasing development of motels and recreational vehicle parks immediately inland from this section of beach. The state beach campground is also in this area. These public and private developments are within walking distance of the beach; consequently, the ratio of people to vehicles is higher here than elsewhere on the beach. This higher ratio causes increased conflict between people and vehicles on the beach. It should be noted, however, that there is still considerable vehicle use in this area, and if the zoning were changed to eliminate vehicle use along this portion of the beach without provisions for off-beach parking, other problems of equal magnitude would arise.

Variable carrying capacity of beach. The carrying capacity of a beach is not static. A given area of beach may accommodate 100 vehicles plus 500 persons during low and mean tides. The capacity of this same area will shrink to zero during periods of high tides. Adequate off-beach parking is not provided at Pismo State Beach to accommodate vehicles during high tides.

Resource protection. Resource protection is also a problem at Pismo Beach. Areas with unique flora and fauna within the dunes but outside the existing park ownership are being destroyed. Although a growing number of concerned vehicle users are attempting to avoid these areas of dune vegetation on their own initiative, a small group of uncontrolled vehicle users continues to destroy unprotected natural values.

Off-highway vehicle parking. Many off-highway vehicle owners trailer their vehicles to the area for operation in the dunes. Presently there are no adequate off-beach parking areas in the vicinity of the dunes where vehicles can be unloaded, and passenger vehicles and trailers can be parked. Consequently, most of these operators use the beach as their staging area, and as a result the vehicle congestion problem on the beach is aggravated.

The problem mentioned above is made even worse because off-highway vehicles that are not street licensed must be trailered from nearby private recreational vehicle parks to the beach or

dunes.

Operation and Maintenance. Several problems of lesser magnitude than those mentioned above deserve mention here because they relate directly to the overall land use pattern and the long-range recommendations included in this plan.

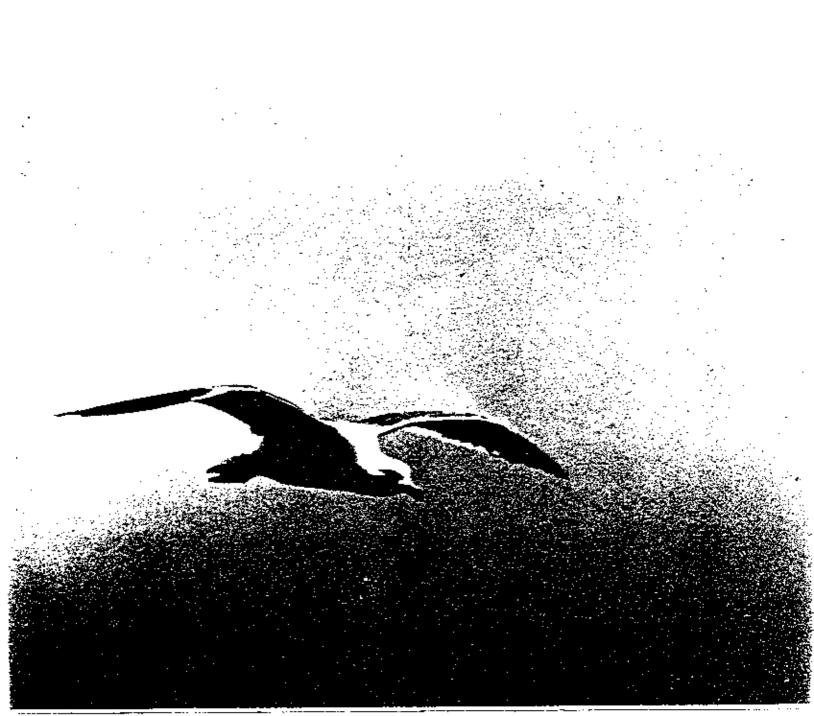
The present entrance to Oceano Campground is poor. The entrance station and office are located immediately off Pier Avenue, and there is neither space for parking nor space for vehicle back up. This results in congestion on Pier Avenue during periods of peak use.

Inadequate parking and turnaround space adjacent to the ramps leading onto the beach causes

additional congestion.

Marshlands on the upland of the state beach have required a continuous program of storm water control and mosquito abatement.

# FUTURE SITUATION





The purpose of long-range planning is to prepare for the future, and since the future holds many uncertainties, we must make some assumptions here. Based on data available from experiences in the field of outdoor recreation, social trends, surveys, demand projections, and information from the Park and Recreation Information System (PARIS), future recreation patterns can be predicted with a reasonable degree of accuracy. Using this data, assumptions can be made that relate to future recreation use at Pismo State Beach and Pismo Dunes State Vehicular Recreation Area. These are indicated under three degrees of probability: reasonably certain, likely, and possible. Certain reference data for these assumptions are included in the appendix.

It is reasonably certain that the demand for recreation land will increase because:

- The population will increase 7.2 percent by 1980 and 23.5 percent by 1990.
- The demand for recreation opportunities will increase at a faster rate than the population growth. For example, the recreation demand of the Los Angeles metropolitan complex, which should continue to exert the greatest pressure on Pismo State Beach and Pismo Dunes SVRA, is expected to increase 27 percent or 1.25 times the population growth between 1970 and 1990.
- Leisure time will increase, and as leisure time increases, so does the demand for outdoor recreation opportunities.

It is reasonably certain that competition between special interest groups for public recreation land will increase because as the overall demand for recreation land increases, so does the demand for individual uses. Historically, this has been the trend. For example, even today in the Pismo area, pressures generated from specialized recreation groups is increasing. Here recreationists converge by the thousands to engage in their own specialized activity. These activities include off-highway vehicle use, swimming, surfing, clamming, fishing, sunbathing, horseback riding, picnicking, and camping. There is also much pressure from environmental groups to set aside lands for open space. All these demands are being exerted on the same area, and since many are conflicting demands, obviously some regulation of use must be exercised.

The automobile is the dominant element in beach-oriented recreation activities at Pismo State Beach, and the majority of users now favor this situation. Some beach uses are incompatible with the auto, and these uses, while increasing, still remain secondary to beach vehicle pressures. Eventually the nonvehicle groups may exert greater pressure for vehicle control and limitations.

It is *likely* that the demand for off-highway vehicle recreation use areas will stabilize. The growth of OHV recreation has reached astronomical proportions. It is estimated that approximately one person in ten now owns or has access to a vehicle that could be used off the highway. There is one registered off-highway vehicle for every 150 Californians. It is *likely* that the saturation of this market will occur in the next few years. As is true of most popular activities or products, they sell rapidly until all interested people are involved. Beyond that point new growth tends to stabilize.

The availability and cost of gasoline should affect OHV recreation. Because driving to the use area often takes more fuel than the on-site OHV use itself, there may be increasing pressure for OHV use areas closer to the major metropolitan areas.

It is possible that new and unknown recreation activities will influence land use patterns in the Pismo area.

In just the past 20 years, new outdoor recreation trends have evolved. There is every reason to believe that the future will bring dimensions in outdoor recreation that are unknown to us at this time.

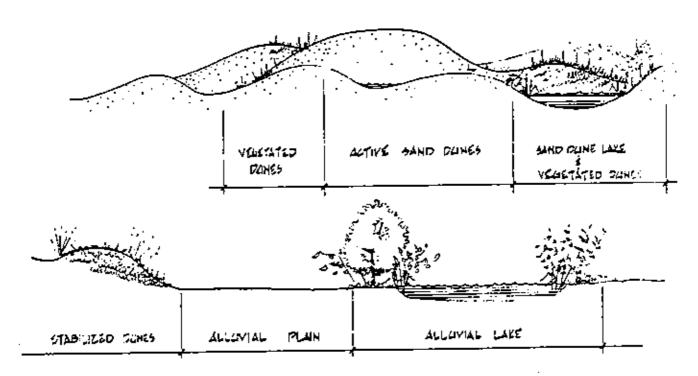
It is reasonably certain that "off-season" recreation use in the Pismo area will increase and possible that visitation during the major summer holidays will subside.

Since 1970, Pismo State Beach attendance figures have indicated a general increase in off-season visitation for both camping and day use while overall annual attendance is leveling off. More people, particularly people without children in school, are taking their vacations in the off-season when the parks are not crowded. Also, people are taking advantage of the clear weather conditions that exist along various areas of the coast during fall and winter months. This changing pattern of use is welcomed by the Department of Parks and Recreation because park lands and facilities will serve a greater number of people under better environmental conditions when use is more evenly distributed throughout the year.

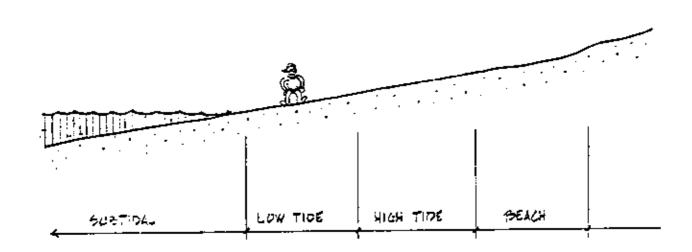
# RESOURCE ANALYSIS AND RESOURCE MANAGEMENT DLAN



FIGURE 8 BIOTIC ZONES



# TERRESTRIAL AND WARSH ZONES



# Resource Analysis ENVIRONMENTAL RESOURCES

#### Biotic Associations

It is easier to understand the physical setting of the Pismo Beach area if one visualizes four ecological zones. These form a convenient framework for classifying and understanding the natural resources of the area. Within each ecological zone are the various biotic associations that characterize the zone. The ecological zones at Pismo Beach are as follows: terrestrial, marsh, intertidal, and subtidal.

Terrestrial zone. This zone includes classifiable land forms or so-called terrestrial communities within the upland area. These forms contain various classifications of the sand dunes and some riparian woodland along the banks of Oso Flaco Creek and lakes. These classified land forms are as follows:

1. Vegetated dunes: Vegetation occurs on the sand dunes throughout the project site. The most densely vegetated dunes are immediately upland from the beach in sheltered locations. Coustal scrub species of plant material and European beach grass have crept into the sand dunes, especially in the foredune area. Native vegetation includes California sagebrush, coyote brush, bush lupin, sand verbena, and arroyo willow. In hollows with sufficient moisture are willows, sedges, and semi-aquatic vegetation. In addition, there are many varieties of herbaceous species that are relatively short-lived. Among the native plant materials that should be especially noted are Cirsium phothophilum, a rare crystalline thistle, and the giant coreopsis.

The Pismo dunes are recognized by scientists, conservationists, government agencies, and the public as being the finest, most extensive coastal dunes remaining in California. Particular areas within this zone are sensitive and will tolerate very little recreation disturbance. In these areas the greatest degree of protection should be given to aesthetic qualities.

Of particular note are the dunes immediately south of Arroyo Grande Creek and dune areas surrounding the lakes and riparian woodland areas. These are fragile and require special protection. The giant coreopsis and the thistle mentioned above also deserve special protection.

- 2. Active dunes: These areas occur between the vegetated dunes and the stabilized dunes. This active sand dune area is tolerant of recreation activities. This zone can support dune buggies and related recreation vehicles, but no permanent structures of any kind should be permitted. Reasons to support this restriction are: the relative instability of the dunes and ancroachment on the visual impact of the dunes.
- 3. Stabilized dunes: These are the most inland of the dunes. This association has been almost completely destroyed by urban development in the downtown portion of Pismo outside the project area. Preservation of exemplary areas in the stabilized dunes is essential in the Pismo Beach and vehicular recreation area project to facilitate scientific research and to satisfy the need for interpretation. Plant species include buckwheat (Eriogonum parvifolium) and lupin (Lupinus chumissonis). Valley quail also inhabit the stabilized dune areas. Vegetation should be saved at all costs. Structures can be permitted provided they are properly located. This area is ecologically sensitive but will tolerate limited recreation activity.
- 4. Alluvial plain: The alluvial plain was created by the Santa Maria River, which came in to the Oso Flaco Lake area in the 1850s. Since this time the river has been diverted through levee systems, and the area has been altered through man-made and natural influences. At present Oso Flaco Creek, a lesser drainage course, flows in this vicinity.

This area is very tolerant of use. There are sufficient slopes from 0 to 5 percent that are well adapted to both day use and camping. As a compliment to the scarce natural cover that occurs on the alluvial plain, a supplemental discriminating planting program of suitable materials would increase the capacity of the area to support wildlife and enhance the suitability of the area for park purposes.

Marsh zone. This zone contains many valuable associations of natural resource value. Most of these associations at Pismo occur in the freshwater marsh category. The classified land forms in the marsh zone are as follows:

Alluvial lakes area: This area occupies a portion of the alluvial plain. The ecological entities to be preserved are permanent freshwater marsh and riparian habitat involving birds. The natural cover surrounding the lakes is valuable for wildlife habitat.

Every effort should be made to protect the Oso Flaco lakes area not only for aesthetic purposes but also for enhancement of bird life. Recreation should be limited to activities that are in harmony

with the degree of protection required to preserve the ecology of the site.

Sand dune lakes: Examples of this type of lake are within that portion of the study area that lies adjacent to and south and east of the Pismo Dunes Natural Preserve. Approximately ten sand dune lakes are contained within this area. In addition, there is jack Lake on Union Oil property, which is within the area proposed for acquisition.

These are freshwater lakes with surrounding vegetative cover. In order to preserve this fragile environment, only limited recreation will be allowed in these dune lake areas. This area is at the present time being managed in such manner as to promote the desired protection to the environment.

Trails should be the only development within these sensitive areas. Vehicles should not be permitted in these areas.

The periphery of this lake area can be used for parking and activities that support the access to

this area for passive recreation.

Freshwater lagoons: North of Arroyo Grande Creek is a series of lagoons, supplemented by a freshwater marsh. These lagoons are surrounded by both native and introduced vegetation and have been partly modified and developed.

Plant cover consists of dense aquatic and semiaquatic vegetation. A great number of permanent

and seasonal waterfowl inhabits the area.

The natural values here are not of sufficient integrity to warrant strict preservation. However, only those recreation activities will be permitted that are in keeping with the environmental character of these lagoons and the surrounding area.

Intertidal zone. The intertidal zone of the Pismo project comes under a classification recognized as high-surf, wide sandy beach. The city of Pismo Beach has a jurisdictional control that includes nearly the entire intertidal zone within the city limit. This zone can be further divided into four distinct areas or minor zones as a result of various tidal exposures. These minor zones are as follows:

Beach area - splash zone: This zone extends from the mean of all high tides to the high reach of spray and storm waves. This zone takes in the uppermost beach which, in its upper reaches, is wetted only by waves and spray; its lower portion is wetted only by high tides.

This zone is tolerant of recreation activity. It can support a variety of activities associated with the beach.

High tide and mid-tide regions: This zone contains the area from mean high water to mean lower low water (the lowest of the daily low tides). This zone is covered and uncovered twice each day. The area from mean high water to mean sea level is the home of barnacles, which tolerate a great deal of air and which require air as well as water for survival. Life in the mid-tide region requires the rhythm of the waves for maintenance of life.

This region is also tolerant of recreation, which includes beach and surf play and running and

walking on the beach.

Low tide regions: This region or zone is uncovered only during minus tides. Its availability is limited to a few hours each month. The sea life that lives within this zone foregoes the less crowded conditions higher up because of its sensitivity to exposure beyond that which the low tides provide. The Pismo clam (*Tivela stultorum*), inhabits this region and offers the opportunity for a unique, historic, and principal recreational activity. This is a highly regarded natural resource and is of utmost importance to the Pismo project.

Subtidal zone. This zone consists of submerged land that is constantly covered by the ocean. On the wave-swept sandy beaches at Pismo, living elements have evolved to tolerate the continual pounding of the surf. For instance, instead of the powerful attachment devices that are found on invertebrates of rocky coasts, sandy beach organisms have developed burrowing mechanisms, thick shells, sand-filtering papillea, and other biological systems to ensure survival.

Clamming, fishing, and boating are the major recreation activities of this zone. Surfing is also enjoyed in a few selected locations.

# Geology and Geomorphology

Regional geologic structure.<sup>1</sup> The regional geologic structure in the Pismo Beach area is extremely complex. The area lies within or near the structural influence of the Coast and Transverse ranges.

The record before the Miocene Epoch is obscure and indefinite. In the early Miocene, nonmarine sediments were deposited. Next the sea invaded the area for the first known time during the Tertiary Period and occupied the region until the end of the Pliocene, During the early and middle Pliocene, marine sediments were again deposited. Deformation was minor but continual. The Pismo Formation was deposited during this epoch. During the upper Pliocene time, the sea advanced farther inland and the Careaga Sand was deposited.

In lower Pleistocene time the Paso Robles Formation was deposited.

In middle Pleistocene time major deformations and intense folding took place. At this time there was partial removal of the Paso Robles Formation in the Arroyo Grande and Nipomo Mesa areas.

After the intense folding and major deformation of the middle Pleistocene, conditions became more stable into the upper Pleistocene. The Orcutt Formation was deposited by ancestral streams. The extent and elevation of the marine terraces indicate that there must have been times of extended uplift in the upper Pleistocene. An example of this is the Nipomo Mesa.

Towards the end of the Pleistocene, during the Wisconsin glacial age, the sea level was considerably lowered. This caused rivers and streams to further entrench their stream beds.

More recent events are the erosion of offshore projecting headlands and the transporting of sand by wave and longshore currents. The wind transported the sand inland to establish the sand dunes. The sand dune development is discussed extensively in a separate section.

Sand.<sup>2</sup> The ocean is the sand resource for the dunes in the study area. The ocean receives its sand supply mainly from erosional materials inland, which are transported by rivers to the ocean. It is estimated that rivers supply more than 70 percent of the sand to California's beaches. Unconsolidated materials eroded from cliffs supply an estimated 1 to 30 percent, depending on the area, and fragmented shells contribute minor amounts on the California coastline. Onshore and offshore movement of existing dunes or ocean bottom sediments contribute in some instances.

Sand transport in the ocean is accomplished mainly by longshore currents, which are the currents parallel to shore caused by waves striking at an angle to the beach. The energy of the wave breaking and creating a surf both moves the sand on the bottom and sets some grains in suspension in the water and moves them along the coast. In the case of Pismo Beach, the waves move in a direction that is nearly perpendicular to the beach, making net longshore drift minimal. Consequently, the sand is driven onto the beach and is blown inland by the wind. This condition, along with parallel ocean bottom contours offshore, tends to create relatively straight beaches.

<sup>&</sup>lt;sup>1</sup> Condensed from a report by John Meisenbach, California State Department of Parks and Recreation, September, 1974.

<sup>2&</sup>lt;sub>(bid.</sub>

The sand supply from Point Buchon to the Santa Maria River is estimated at 8,000 cubic yards per year from San Luis Obispo Creek and 13,000 cubic yards per year from Arroyo Grande Creek. The estimated deposition of sand on the beach is 79,000 cubic yards per year between Pismo Beach and Oso Flaco Creek and 46,000 cubic yards per year from Oso Flaco Creek to the Santa Maria River. It is also postulated that the ocean bottom itself supplies approximately 100,000 cubic yards of sand per year from older alluvial deposits supmerged after the retreat of the last glacial period.

Dune formation. In general the whole complex of dunes is known as the Santa Maria Dunes. The study of the dunes is based on William S. Cooper's "Coastal Dunes of California," 1967. Three topographic units comprise the dunes in the Pismo area. They have been identified as the Callendar unit, the Guadalupe unit, and the Mussel Rock unit. The Callendar dune complex rests mainly on the Nipomo Mesa and partly on the alluvial strip between the Nipomo Mesa and the ocean coast. The Pismo study area falls within this alluvial strip. Along the coast the Callendar dunes extend from Arroyo Grande Creek to Cso Flaco Creek.

The Guadalupe unit extends from Oso Flaco Creek to the Santa Maria River and rests on the broad Santa Maria River alluvial plain. The Mussel Rock unit extends from the Santa Maria River to Point Sal and rests on the Ordutt Mesa and a portion of the Santa Maria River flood plain.

The dunes along the Pacific coast have been identified as pre-Flandrian and Flandrian. The pre-Flandrian dunes are very old and were formed before the Flandrian transgression. Because of their long and complex history, they are referred to only as pre-Flandrian. It is thought that their origin goes back more than one glacio-custatic cycle.

The formation of the Flandrian dunes in the study area of the Callendar dune complex followed the formation of the ancient pre-Flandrian dunes on the Nipomo Mesa. These highly vegetated and stabilized dunes cover about 18,000 acres and extend 11 miles inland. Although the Nipomo Mesa dunes are out of the study area, their formation is significant in tracing the younger dune history.

The pre-Flandrian dunes cover most of the Nipomo Mesa, a stream-formed alluvial terrace.

The Flandrian dunes show evidence of two major episodes of advance. Episode I is the older and consists of the highly stabilized dunes inland. Episode II involves mainly active, moving dunes reaching shore.

The present highly stabilized dunes of Episode I lie mainly on Nipomo Mesa and are roughly in the form of a triangle south of Black Lake Canyon. They have penetrated inland about four miles and extend two and a half miles south of Black Lake Canyon, generally inland from the main mass of active dunes at Pismo State Beach. They are composed of many overlapping parabolas with the open end seaward.

In the northern part of Black Lake Canyon, the Episode I stabilized dunes appear in the form of four wide parabolas and several narrow ones resting on the ancient alluvial plain of Arroyo Grande Creek just south of Cienega Valley. Each of the four major parabolas has one or two shallow lakes or marshes within its troughs. The parabolas basically have common lateral ridges that have been penetrated by active sand on the ocean end.

Generally parallel to and 500 to 1,500 feet inland from the shoreline, discontinuous fragments of stabilized Episode I dunes penetrate the active dune surface. Traces of the older ridges at the coast foredune area can be matched with these Episode I dunes in the typical west-northwest direction.

Various dune patterns are the result of (1) wind, sand, and water; and (2) the previous elements and the addition of vegetation. One pattern of each of the above is found in the study area.

The addition of vegetation introduces irregularity and diversity to dune forms.

Soils. The dominant soil in the study area is coastal dune sand. The majority of the area is covered by actively drifting sand supplied by the ocean and blown inland by the wind. Substantial portions have been stabilized with vegetation.

Portions of the area surrounding Oso Flaco Lake and Creek consist of swampland and stream-deposited agricultural land.

The Soil Conservation Service is currently conducting a soil survey of southern San Luis Obispo County and has provided the following interim soil classification information.

The dune sand is classified as VIe-1, which generally makes it unsuited to cultivation, in this case due to wind erosion. Under irrigation and with slopes less than 15 percent a class IVs-4 is possible. This class soil requires very careful soil management and plant selection.

The immediate area of Oso Flaco Lake and Creek is swampland classed VIIIw-1, which precludes any commercial crop uses due to wetness or flooding.

Generally, the soils southeast of Oso Flaco Lake and Creek are agricultural. The dominant types are Camarillo silty clay loam (IIw-2) and Camarillo sandy loam (IVw-2). Both soils are limited due to wetness caused by poor drainage or flooding.

#### SCENIC RESOURCES

The unique scenic impact of the Pismo project area is comprised of two major elements: the ocean and the terrestrial zone. The terrestrial zone includes all the land from the top of the Pismo hills to the water's edge.

The ocean, which contains fishing and clamming resources, is in itself a marvel of nature and is the visual focal point at Pismo. The gamut of colors to be experienced ranges from the gray-green surf to the reflection of brilliant sunsets on the water.

The prominences composing the Pismo hills serve as a backdrop to the ocean scene. The full impact of the various scenic elements of the Pismo Beach project can be experienced when one climbs to the highest level of the dunes. Here the gently curving coastline, the Pismo hills, the patchwork of agricultural lands, and the cities to the north all blend into an impressionistic panorama — a picture of magic elements cast in an ever-changing background.

Visual quality is enhanced by the vegetated dunes, the sand dune lakes, and the freshwater lagoons with their wealth of plants and birdlife.

# **CULTURAL RESOURCES**

History

The Pismo Beach region has an interesting history going back in time to 1769, when Don Gaspar de Portola and parties camped in the area.

According to the diary of Costanso, a member of the Portola party, "the party continued over the sand dunes (from Oso Flaco Lake) and then descended to the beach, along which they walked for several miles before camping for the night. Near their camping place was an Indian village of some forty people." Undoubtedly the beach walked upon by the Portola party was that known today as Pismo State Beach.

Pismo Beach takes its name from Rancho Pismo — a name of Indian origin. The city advertises itself as "the home of the Pismo Clam." In early days the sands at Pismo Beach are said to have been "paved with huge clams." At that time there was no restriction in clamming. Farmers plowed the sand, turned up the bivalves and used them for hog and chicken feed.

In 1911 a limit of 200 per day, with a minimum size, was prescribed by law — an early effort at protective legislation.

Before 1920 clams were in great abundance, but the continual impact of hordes of clammers, often taking thousands each day, depleted the supply. There are still many clams at Pismo, but it is unlikely they will ever again reach their former number.

The communities of Shell Beach (northwest) and Oceano (southeast) adjoin Pismo Beach; the former is now within the corporate limits of the City of Pismo Beach. During prohibition Shell Beach was a favorite of smugglers and bootleggers. The Oceano area, largely comprised of sand dunes, was frequently used by the motion picture industry; many scenes representing the Sahara Desert originated here only a few yards from the Pacific Ocean.

Both Pismo Beach and Oceano are within the former boundaries of Rancho El Pismo, granted on November 18, 1849 by Governor pro-tem Manuel Jimeno Casarin to Jose Ortega. In 1866 it was patented to Isaac Sparks. Sparks was a famous sea otter hunter, who subsequantly turned rancher.

John M. Price, an employee of William Goodwin Dana at Rancho Nipomo, was the next owner of the property. On the south side of a canyon located near Pismo Beach, Price built a large adobe. This canyon was named Price Canyon in honor of its owner.

A wharf was built at Pismo as early as 1881, but it never became the popular landfall for those entering San Luis Obispo County; Port Harford, several miles north and closer to San Luis Obispo, enjoyed that distinction. The town of Pismo Beach was founded in 1891, when the Southern Pacific Railroad was built from San Luis Obispo to Ellwood in Santa Barbara County.

Today the popularity of Pismo Beach is attested to by its many permanent residents, and by State Beach attendance, which exceeded 2,100,000 persons in 1972.

# Archeology<sup>3</sup>

The Pismo Beach area is within the territory of the Indians of the northern Chumash, especially the group known as the Obispeno. The native name for the Obispeno appears to have been Stishini. Place names in the general area include Tishlini, the native name of San Luis Obispo. Pismo and Huasna appear to be derived from Chumash village or area names.

Archeological data for the San Luis Obispo region indicate that the area was occupied by at least 7000 B.C. The terminal archeological period, Canalino, began about 2,000 to 3,000 years ago and ended with the Spanish Conquest. There seems little doubt that the archeological sites at Pismo

SB may be assigned to the Canalino period.

The specific archeological resources within Pismo State Beach consist of 14 sites. Of the 14 archeological sites within the unit, several cover less than 1,500 square feet, five are between 3,500 and 15,000 square feet, and the two remaining sites are 54,400 and 67,500 square feet in area,

None of the small sites, less than 1,500 square feet, have a depth greater than six inches, suggesting that all these sites represent shellfish processing areas used for a short period of time.

The somewhat larger sites, 3,500 to 15,000 square feet, mostly range in depth from 12 to 18 inches, suggesting that they represent temporary Indian camp locations, probably used during the period of time devoted to shellfish collection.

The two largest sites, 54,000 square feet and up, may represent village sites, though their

recorded depth suggests that these may simply represent favored camping locations.

The greatest site density is in that portion of the unit just southwest of Oceano, Within an area

of one-half by one mile are located 10 of the 14 sites within the state beach.

Within the present vehicular recreation area is one major archeological site, No. SLO-199. extending over nearly 25,000 square feet. It is not within one of the major vehicular use patterns, but it is being studied for necessary protective measures. Two additional known sites are within the proposed expansion area. The discovery of additional archeological values in the future is a distinct possibility.

Those archeological sites that do not enjoy a preserve status must be protected in other ways. First, they should be posted and fenced, and an active and intensive excavation program should then be undertaken to provide data that will validate their loss should it occur through human and natural erosion. The signs should not highlight the cultural values but should draw attention to the importance of protecting these zones or areas of high environmental value.

An excavation program for these sites is being prepared as an accommodation to this Department by professional members of the California Polytechnic State University at San Luis Obispo.

<sup>&</sup>lt;sup>3</sup>Condensed from a report by the Resource Management and Protection Division, May 3, 1974.

# Resource Management Plan PISMO STATE BEACH

Pismo State Beach, established in 1934 and expanded through various later acquisitions, lies on the coast of San Luis Obispo County. It extends southward from the City of Pismo Beach for approximately seven and a half miles and embraces a land area of approximately 1,100 acres, plus an additional 1,000 acres below the mean high tide line for which application has been made to the State Lands Division.

In addition to the beach itself, which is broad and gently sloping and is the habitat of the famous Pismo clam, the unit includes lagoon areas along the lower course of Meadow Creek and north of the mouth of Arroyo Grande Creek; stabilized dune areas between Meadow Creek and the ocean; and higher and wilder dunes south of Arroyo Grande Creek, largely unstabilized and included within Pismo Dunes Natural Preserve. The southernmost four miles of the unit consist of the beach itself, oceanward from the toe of the foredune. The adjacent inland areas are contained within Pismo Dunes State Vehicular Recreation Area.

The low dunes north of Arroyo Grande Creek are not in their natural condition. They are occupied in many places by introduced plants and by developments of various types, it appears to be in the public interest to maintain these dunes in a condition controlled by vegetation.

The lagoons along Meadow Creek are likewise in a heavily modified condition, and while they have reverted to a quasi-natural condition in some places, investigation has proved that it is not possible to maintain them in that condition. The lagoons should either be preserved in seminatural condition, or they should be landscaped, whichever is the more practical approach in view of the factors bearing on their maintenance, their freedom from breeding of nuisance insects, and other related considerations.

The natural dunes south of Arroyo Grande Creek are included within Pismo Dunes Natural Preserve. A resource management plan has been prepared specifically for that unit.

The beach itself affords recreational opportunities unlike those anywhere else in California. Apart from the availability of the Pismo clam, this beach has traditionally been the only one in the state on which the use of vehicles is permitted. Vehicular use of the beach not only makes possible much easier clamming; it also permits camping with either recreational vehicles or portable equipment on the inner edge of the beach and closer to the ocean than may be enjoyed anywhere else. The perpetuation of these activities is highly valued by many.

There is some responsible opinion in the scientific community that the driving of vehicles on the beach seriously endangers not only the Pismo clam but other species of littoral animal life as well. It is claimed that this is particularly true when vehicles are driven close to the ocean at low stages of tide. Further investigation and evaluation of this opinion is an important need, and may call for modification or closer regulation of certain recreational activities.

#### Declaration of Purpose

The purpose of Pismo State Beach is to make available to the people an outstanding coastal area of beach and sand dunes located in and southward from the City of Pismo Beach in San Luis Obispo County. Specific recreational activities to be perpetuated and provided for include the aesthetic enjoyment of dunes and shore; beach vehicular travel, when consistent with the perpetuation of the natural values; camping, both in established inland facilities and on the beach in appropriate zones; fishing and clamming under appropriate applicable regulations; and walking or riding horseback in the sand dune areas.

# Declaration of Management Policy

Pismo State Beach will be managed by the Department to perpetuate and enhance the recreational opportunities afforded by this outstanding coastline, together with the scenic and natural features upon which such recreational opportunities depend; to regulate the various uses in the interest of the safety and enjoyment of visitors; and to coordinate the various activities and uses

in such a way that the resources of the area are protected and perpetuated to ensure their continuous availability to the people. All activities within Pismo State Beach shall be carried out under the guidelines established by the Resource Management Directives of the Department of Parks and Recreation.

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# PISMO DUNES STATE VEHICULAR RECREATION AREA

Pismo Dones State Vehicular Recreation Area is a unit of the State Park System that presently embraces about 810 acres, with an additional 2,130 acres now contemplated for acquisition. It lies southward and inland from Pismo State Beach and includes the highest portion of the sand dune areas in southwestern San Luis Obispo County. In total it is approximately three and a half miles in extent from north to south, beginning at the south boundary of Pismo Dunes Natural Preserve, and a little more than two miles in extent from east to west, extending inland in places as far as the main line of the Southern Pacific Railroad. Its west boundary is the western toe of the foredune at the inland edge of the beach.

Roughly half the area within this unit consists of unstabilized dunes that are ideal for off-road vehicle operation and other related recreational pursuits. Also included within the unit, however, are stabilized dunes of considerable ecological significance, valley margins adapted for development of facilities, and freshwater lakes trapped by the shifting sand, some of them having considerable ecological interest and importance. There are three known archeological sites, but two of these are large and of great interest and significance; they are not within the zone that is to be used for active vehicular recreation.

# Declaration of Purpose

Pismo Dunes State Vehicular Recreation Area is established to make available to the people opportunities for recreational use of off-road vehicles in a large area of unstabilized sand dunes exceptionally adapted to this recreational activity; to regulate such uses in the interest of visitor safety and environmental protection; and to provide appropriate related facilities to serve the users of the area. At the same time, the area is established to afford protection to surrounding stabilized sand dunes that embrace some areas of great ecological interest and significance, including freshwater lakes. These areas are important not only in their own right, but also as key elements in the environment within which the vehicular activities will take place and in the quality of the visitor experience arising from those activities. This protection is to be afforded by exclusion of vehicular activities, by establishment of natural preserves in appropriate locations, and by other measures as required.

# Declaration of Management Policy

The Department will manage Pismo Dunes State Vehicular Recreation Area in ways that perpetuate and enhance the uses and values enumerated in the declaration of purpose, that reduce or eliminate conflicts between patterns of use arising from the kinds of resources present in the area, and that forward mutual understanding between the diverse groups of visitors and interested persons who use this area for various recreational and scientific pursuits. Operating and management procedures will provide for the protection and perpetuation of the several islands of vegetation existing within the designated vehicular use areas. All departmental activities at Pismo Dunes State Vehicular Recreation Area will be carried out within the guidelines established by the Resource Management Directives of the Department of Parks and Recreation.

# PISMO DUNES NATURAL PRESERVE 1

Pismo Dunes Natural Preserve is an area of approximately 430 acres, with expansion to 570 acres now contemplated, within the sand dune area of Pismo State Beach. Established in July, 1974, the natural preserve begins at the left bank of Arroyo Grande Creek, its northern boundary common to Pismo Dunes State Vehicular Recreation Area. Laterally, it is bounded on the west by the seaward toe of the foredune, this being the inland limit of the beach, and extends inland from there to the eastern boundary of Pismo State Beach, approximately at the crest of the highest dunes. The foredune is well stabilized with woody and seasonally herbaceous vegetation; the higher dunes farther inland are active and bare of vegetation. Within the natural preserve are a large number of the known recorded archeological sites within the entire Pismo dunes complex.

## Declaration of Purpose

Pismo Dunes Natural Preserve is established to perpetuate in essentially natural condition a substantial tract of sand dunes in an area where they attain outstanding development and where they may easily be visited and enjoyed by interested persons. Full protection is also afforded to all archeological sites located within the unit and to all natural vegetation and wildlife occurring within it.

# Declaration of Management Policy

The Department will manage Pismo Dunes Natural Preserve in accordance with Section 5001.5(f), Public Resources Code, and with the Resource Management Directives of the Department of Parks and Recreation. It will be kept free not only of roads, structures, and other facilities, but also of dune stabilization projects of all kinds. Motorized vehicles of any type, except in cases of extreme emergency, are prohibited.

# PLAN ANALYSIS





# Acquisition

The acquisition of key private land will:

- Ensure continued public use and enjoyment of beach and dune recreation lands.
- 2. Be necessary to accommodate the ever-increasing pressures for recreation lands in the Pismo Beach area.
- Provide the means for state action to protect now privately owned natural and cultural values that are currently being damaged.
- 8e a necessary step toward the development of a new access to the dunes which, when provided, will relieve venicular congestion on the beach.
- 5. Provide lands on which base facilities can be developed for both active and passive recreational uses in the dunes.

The most urgent land acquisition need involves approximately 1,400 acres of land south of the Pismo Dunes State Vehicular Recreation Area. This property includes Union Oil Company lands west of the railroad and properties in the vicinity of Oso Flaco Lake. This would include the acquisition of large parabolic sand dunes, freshwater lakes and marshlands, and outstanding examples of native plants in the Coreopsis Hill area.

Problems relative to access and land use in the Pismo Dunes State Vehicular Recreation Area can be satisfactorily solved only if both the Union Oil Company property and the Oso Flaco properties are acquired. Funds from the 1974 Park Bond Act are earmarked for the acquisition of lands in the Oso Flaco Lake area; however, there is no source for funding the acquisition of the Union Oil Company properties. Funds for the purchase of Union Oil Company lands are urgently needed. The state cannot develop leased lands; therefore, a lease is not the solution.

Acquisition of 280 acres of Pacific Gas and Electric lands is important though less urgent than the two properties previously mentioned. The PG&E lands are an integral part of the total dune complex and must eventually be acquired for public use. This land is not vital to the solution of some of the more pressing problems. To provide for public use of this land in the interim, the state

should renegotiate its lease of the property.

The Dune Lake properties are currently being managed as a private preserve, and the natural values are well protected. This management policy is totally compatible with the state's policy for management of the neighboring public recreational lands. In the event the natural values on the Dune Lake properties were jeopardized through development, it would be desirable to acquire this property for preservation and recreation purposes. The State of California, in its management of off-highway vehicle use, has an obligation to the Dune Lake properties, as well as other neighbors, to provide an adequate buffer from vehicle use.

It would be desirable eventually to acquire the private ownership within the sand dunes between the Pismo Dunes Natural Preserve and the agricultural lands in the Cienega Valley. This

would ensure the environmental integrity of the dune preserve.

It would be in the best interests of the public if the state were to assume ownership of the La Grande Beach Tract, containing 630 acres and primarily owned by the County of San Luis Obispo. It is logical that this inholding be administered by the state in conjunction with the state beach and vehicular recreation area. The administration of this area by the state would provide continuity to the state beach and relieve the county of administration and maintenance costs.

The primary need for additional public land is for large parcels of land south of Arroyo Grande Creek in the vicinity of the state vehicular recreation area. It would, however, be desirable to acquire some specific smaller parcels of land north of the creek within the vicinity of the state beach. The implementation of a part of this plan involves the cooperation of local agencies in the abandonment and transfer of interest in portions of streets near the foot of Grand and Pier avenues.

# Control

If the beach and the dunes are to continue to serve highly diversified recreational activities and great numbers of people, and if the public is to enjoy a quality recreational experience with maximum environmental integrity, then the most effective means to accomplish this is through the implementation of controls at all access points to the beach.

Controlled access does not imply that a fee be charged for day use, nor does controlled access mean that each access will be manned 365 days a year. Controlled access does mean that during periods of moderate and heavy visitation, each visitor will have ready access to recreation area information as well as rules and regulations. It means that beach camping as well as any other recreational use that might threaten environmental integrity can be controlled to specific numbers. It means that law enforcement problems will be eased and that in general visitors to the area will enjoy their visit more and yet be more inclined to obey regulations, such as speed limits on the beach.

# Beach Day Use

Beach touring (driving an automobile on the hard sand beach) is a favorite recreational activity among many. For some, particularly out-of-state visitors, this is a rare, long-remembered experience. Indeed, there are few areas where natural conditions provide such an opportunity. For other visitors, the hard sand beach serves a utilitarian role: it allows them to drive to their favorite location, where they can pursue a recreation activity, such as fishing, camping, clamming, or dune buggying.

Provided there are ample areas zoned for other beach activities and provided the 15 MPH speed limit is enforced, there is no known reason why beach touring should not continue. The day-use vehicle activity has not yet reached proportions that justify regulation of numbers. Possibly this will be necessary some time in the future. It is important that studies of the ecological impact of vehicle use on the intertidal zone at low tide be continued and that findings from such studies regulate vehicle use.

It seems logical to conclude that the more that can be done to reduce vehicle traffic on the beach and to reduce conflicts between beach vehicle interests and other beach user groups, the better will be the opportunity for this rare beach touring activity to continue. Steps that will reduce beach vehicle traffic include:

- 1. Provision of new access to dunes for off-highway vehicle use
- 2. Significant reduction in beach camping
- 3. Provision of parking areas adjacent to beach
- 4. Provision of a beach-dunes interpretive tour vehicle that could also serve as a people mover and operate the full distance of the beach with regular stops
- 5. Provision of a local transportation system that would connect inland motels and recreational vehicle parks with the beach
- 6. The development of a functional system of bicycle trails to connect the state beach use areas with the local communities

Use patterns on the beach between Grand and Ocean View avenues indicate that it will not be too many years before this area should be converted to nonvehicular day use. This segment of beach is about one mile in length and is receiving increasing numbers of walk-in visitors from nearby campgrounds and motels. The beach will serve a greater number of people in a safer and better environment without automobile traffic. Certainly automobile traffic is not compatible on a beach where large numbers of people converge for beach play. Local businessmen in the city of Pismo Beach oppose this conversion of beach use because it will isolate beach vehicle traffic from the city and consequently, they believe, will adversely affect their economy. It is very likely, however, that by the time the state could implement this conversion — perhaps five years from now at the earliest — the businessman in Pismo Beach will welcome this recommended conversion of use. The conversion should not take place before adjacent off-beach parking is provided.

The Department has been instructed by the State Park and Recreation Commission to work with the city of Pismo Beach regarding the closing of the Ocean View Avenue ramp.

# Day Use Within Inland Areas of the State Beach

Excluding the concession-operated golf course, at the present time there are no facilities or areas provided for day-use recreation activities in the interior of the state beach. There is adequate space for the introduction of several uses in this area, and the primary need is for picnic use. Picnic sites in this area would be protected from the wind and could be located in the highly scenic

vegetated area adjacent to Meadow Creek south of Grand Avenue. Flooding and mosquito abatement problems could be solved with dredging, grading, and landscaping, which would allow this area to be developed and managed for picnic and related uses. By varying the width of the lagoon, providing waterfowl islands, and developing trails and picnic sites around the lagoon, an interesting and valuable recreation opportunity will be offered to kayakers, birdwatchers, bicyclists, hikers, and fishermen. This section of the creek has been previously modified by man; consequently, it is not regarded as an area with significant natural values. The area does harbor wildlife; however, the nature of the modifications and use proposed for this area would not adversely affect the wildlife habitat.

The east slope of the sand dunes that protect the Meadow Creek area from the ocean winds have been planted with beach grasses and stabilized. Today there is a variety of both natural and exotic coastal plants occurring in this area. Here there is an excellent opportunity to manage a botanical area for scientific and educational purposes. With some additional plantings this area will help to interpret the native flora and fauna in the dunes natural preserve. The area would serve best as a dune arboretum with minimum developments, including a parking area, boardwalk trails, and interpretive facilities.

The existing concession-operated restaurant and golf course at Grand Avenue have been well received by the public and well patronized. The golf course provides an excellent open space element at the proposed major entrance to the park. These uses should be continued.

There is a distinct need for identifying lands of state ownership. This can be best accomplished through signs, elimination of unrestricted access, and development of a road system emanating from a main entrance and serving each of the use areas, including overnight areas and the beach.

There is a considerable amount of equestrian use on the beach and in the dunes. Presently there is less than adequate regulation of the use of horses on the beach, and there are few areas developed for equestrian use. There is a need for the designation of riding trails in the dunes and on a specific segment of the beach. There is also a need for the development of two staging areas on the trail system where visitors can park and unload their trailered horses. The best location and opportunity for the development of one such area is on county land adjacent to the Arroyo Grande Creek levee. There is an opportunity to develop a similar type of staging area some five miles south within the proposed Pismo Dunes State Vehicular Recreation Area expansion at Oso Flaco Lake. The trail system connecting these two areas would be best located within the buffer zone on the exterior of the off-highway vehicle area.

The provision of bicycle trails is important to the interior circulation system.

#### Day Use Within State Vehicular Recreation Area

The basic day-use elements within the proposed vehicular recreation area include:

- Touring and competition areas on the interior of the dunes.
- 2. Peripheral buffer lands separating the touring and competition areas from neighboring private lands.
- Peripheral natural areas serving passive nonvehicular uses.
- 4. Day-use staging area providing the operational base for the off-highway vehicle activities
- Support facilities for the peripheral natural areas.
- Administrative facilities necessary to the operation and maintenance of the state vehicular recreation area

Touring and competition areas. The non-vegetated area on the interior of the dunes is to be designated for vehicular activities. There are some vegetated areas within this area that have been criss-crossed with roads in recent years by off-road vehicle use. Some of these roads should remain open to provide better circulation and diversified terrain for vehicle operators. To prevent sand blow-outs and further loss of vegetation, other roads should be closed, planted, and stabilized. The determination of which roads should remain open must be carefully carried out on the site with vehicle operators and resource management personnel.

A simple system of zone delineation could be implemented within the dunes. Reflectorized panel markers using symbols indicating various messages could be adopted. This might be similar to

the system of markers adopted by boaters.

Competitive events, including drag races and hill climbs, have been conducted at specific locations within the dunes for a number of years. Such events have been well controlled and conducted in an orderly fashion. There is no reason why the off-road vehicle groups should not continue these events.

Several vegetated areas within the dunes provide an excellent environment for off-highway

vehicle family picnic use. This use should continue.

Peripheral buffer lands. This is an area of varying width on the perimeter of the touring area. The actual interior boundary of this buffer zone must be determined in the field to suit topographical conditions. The width of this zone should be a minimum of 500 feet. The zone will serve to protect private lands bordering the vehicular recreation area, and off-highway vehicle use will not be permitted within the buffer zone. This zone will accommodate a riding and hiking trail as well as a route for the interpretive tour vehicle. Within this zone are several archeological sites that must be protected. The margin of this zone would be increased when justified by neighboring values, such as the ecologically sensitive Black Lake area.

Peripheral natural areas. These are the areas that support significant natural values worthy of management for passive recreational uses and protection from off-highway vehicle use. This includes Jack Lake, Oso Flaco Lake, Coreopsis Lake and related marsh, as well as dune and vegetated areas,

including Coreopsis Hill and Little Coreopsis Hill.

Day use staging area. This is the area that will serve as the base for off-highway vehicle recreation activities. This area must serve the following functions:

- Parking and a trailered vehicle unloading area should be provided for off-highway vehicle
  operators. This will require a vast area for parking during peak use, which occurs on relatively
  few days of the year. Consequently, it is reasonable that the paved parking area serve only the
  basic needs and that less costly turf areas be provided for expansion of parking during peak use
  periods.
- 2. The basic needs of the off-highway vehicle operator should be met in this area. This would include concession facilities, such as fuel and service. Eventually a concession-operated storage and rental service may prove economically feasible. Food and beverage supplies in the early stages of the project might best be offered through a mobile facility during heavy use periods.
- 3. Off-highway vehicle organizations should have the opportunity to develop administrative facilities for their activities in this staging area. This could be a center developed for information and competition event registration. These groups could possibly implement a patrol and safety program similar to that undertaken by ski patrols.
- 4. It is essential that vehicular recreation area operational facilities be located in this area. This would include a state-operated control center with first aid facilities and an information and education program.

Support facilities for passive recreational uses. This includes the access roads, parking areas, trails, picnic areas, and equestrian and interpretive facilities necessary to visitor enjoyment of the Oso Flaco and related nonvehicular use areas.

Administrative facilities. This element relates to overnight use and day use equally. The most efficient way to administer the Pismo Dunes Vehicular Recreation Area will be to develop administrative facilities directly in relationship to the area. This will include the operational center mentioned above as well as a maintenance center, employee housing (mobile home), and an entrance contact station.

# Overnight Use

# Beach Camping

During periods of peak use the beach becomes congested with vehicles, and in recent years this congestion has resulted in adverse environmental conditions and has reached proportions that jeopardize public health and safety. A major contributor to this congestion has been the beach camper.

On the major holidays most of the beach campers are off-highway vehicle enthusiasts who find the beach the most convenient base for access into the dunes. Many of these campers would prefer camping in areas behind the dunes protected from the winds; however, only 25 percent of the vehicles (campers, motorhomes) are capable of operating in the sand. Many campers with this capability drive to primitive camping areas in the interior of the dunes.

If a hard surface road were provided to a camping area with basic facilities in the stabilized area at the rear of the dunes, a great deal of the pressure would be taken off the beach.

Most off-highway vehicle operators do not seek the conventional type of campsite provided by the California State Park System. They prefer a less formal area with flexibility, where small numbers of vehicles can converge in groups. They do not require conveniences, such as showers. electric and water hookups, and individual parking spurs.

There are a number of private recreational vehicle parks in the Pismo area, for those who seek

utility hookups and other conveniences.

The basic problem with beach camping is the number of campers. Environmental conditions can be maintained at a quality level only when use is restricted to designated areas in low densities. With controlled access it is possible to maintain a given level of density during peak use periods.

The present problem involving too many campers on the beach during the three major holidays is not likely to be solved through the abrupt discontinuance of camping during these peak periods of use. This action will not immediately stop the influx of campers to the general Pismo area. If camping on the beach is banned, these campers will overflow into the streets of the local communities or into other areas that may be provided for emergency camping areas. The adverse environmental conditions that would result would likely create equal if not greater problems than beach camping. It should be noted that during these periods of heavy camper influx all private and public campgrounds are filled to capacity.

The most logical solution to the beach camping problem will be through the following actions.

- Educate the beach camper as to the problem and the need for correction.
- Immediately acquire lands in the rear of the dunes and develop camping areas accessible to 2. passenger vehicles.
- Provide and enforce stringent environmental controls on beach cambing.

Note: The Department of Parks and Recreation's "Interim Use Plan," published in the summer of 1974, was the first step toward implementation of these actions.

Some visitors camp on the beath for the rare beach camping experience rather than because of the convenient access to the dunes. Indeed, this opportunity is unique to Pismo Beach for nowhere else on the California coast does this type of outdoor recreation opportunity exist.

A basic responsibility of the State Department of Parks and Recreation is the provision of outdoor recreation opportunities of statewide significance. At this time there is no known reason why low-density camping should not continue on the beach. Within the foreseeable future, beach camping, if maintained in designated areas at low densities, will not compete with day-use activities nor will it create adverse environmental conditions on the beach.

# Primitive Camping in Dunes (4-WD Access)

This type of camping has long been enjoyed by the off-highway vehicle owners. Camping areas in the dunes have been policed and maintained in a sanitary condition by off-highway vehicle groups.

There are no land use conflicts with primitive dune camping, providing:

- Camp areas are maintained in designated locations clear of active touring areas. 1.
- The number of campers is maintained in balance with area size and sanitary facilities.
- The use remains of a primitive nature. So called "improvements" and modifications to the 3. landscape should be kept to a minimum.

# Back-Dune Camping (Passenger Car Access)

The use of carefully selected areas in the stabilized backdunes for camping would alleviate pressures for beach camping.

Vehicle travel within back-dune camping areas must be confined to designated routes of travel to protect vegetated dune areas.

# Back-Dune Overflow Camping (Passenger Car Access)

Approximately 20 days a year all available private and public camping areas are filled, and there is a need for an overflow camping area. Areas in the backdune are suitable for overflow camping provided:

- The use is contained in designated areas
- The use remains at a level that will permit natural rehabilitation and recovery of the site.

# Inland Camping (Conventional Campgrounds)

The present land use at Oceano and North Beach campgrounds provides low-density family camping. The site densities within these areas are generally good. With some rehabilitation these areas should continue to serve the public as they have in the past.

Adjacent to the state beach the private sector is providing high-density campsites with electric, water, and sewer hookups for recreational vehicles. State beach lands would best not be used for this type of facility, which is readily available nearby.

# Hike-in Camping

Hike-in camp areas are not now available. With the acquisition of lands in the Oso Flaco Lake area, there would be an excellent opportunity to provide such an area with primitive facilities.

The area should be separated from the sight and sound of off-highway vehicle use. Trailhead parking and trail facilities should be provided in conjunction with hike-in camping. The area should be designed to accommodate both individuals and small groups.

An increasing number of long-distance bicyclists and hikers uses units of the California S: Park System. The Department will soon begin to provide hostels to accommodate these visitors. Pismo State Beach area is beginning to receive an influx of this type of use, and there is an excelle location for such a facility adjacent to the existing Highway 1 bicycle trail adjacent to the Nor

# Primary Access to Pismo Dunes State Vehicular Recreation Area

Once the key lands related to the SVRA have been acquired, a new access and suppor facilities for off-highway vehicle activities should be provided. This acquisition and development ar urgently needed for the relief of vehicle and camping pressures on the beach.

The access to be provided will serve not only OHV interests; there are also scenic natural areas in this region that will be acquired for passive recreational activities. Certain support facilities, such as access, parking, trails, and picnic facilities should be developed adjacent to these non-off-highway

After a number of alternatives were studied, two possibilities were considered for access to the Pismo Dunes State Venicular Recreation Area. The first, Alternative A, would provide access from Highway 1, immediately north of the oil refinery; the second, Alternative B, would provide access

There has been a division of opinion on these two access routes. The County of San Luis Obispo has recommended the Oso Flaco access; the Pismo State Beach Technical Planning Committee also recommends the Oso Flaco access. The Citizens' Advisory Committee and a coalition of user groups, including conservationists and off-highway vehicle users, favor the Highway 1 access. The State Park and Recreation Commission also recommends the Highway 1 access.

The general acquisition program for this area will not be materially altered by the selection of access. If the Highway I access is selected, it will be necessary to acquire an additional narrow connecting corridor of land about 1,500 feet long between the highway and the proposed SVRA

Access to the area proposed for off-highway vehicle support facilities would be most direct over Highway 1. This access would save nine miles for southbound traffic and a half mile for northbound traffic. However, if the destination were the Oso Flaco Lake area, where passive recreation use facilities are proposed, the Highway I access would not offer a mileage saving.

From its intersection with Highway 1, the Oso Flaco Road is three miles long to Oso Flaco Lake, where the road ends. This is a paved county road that presently serves only the agricultural fields and recreation use. On this section of road there is a crossing of the Southern Pacific Railroad with signals and crossarms. If the major access to the Pismo Dunes State Vehicular Recreation Area is located at Oso Flaco, the standard of this three-mile section of road will eventually have to be

The Highway 1 access would necessitate the construction of approximatley 1,500 feet of new road plus a costly railroad overpass.

Proponents of both means of access have offered valid arguments favoring the access that best serves their interest. Those favoring the Oso Flaco access fear that the Highway 1 access would bring off-highway vehicle recreation activities too close to the privately owned Dune Lakes properties environmentally sensitive lands that are now managed as a preserve. Conversely, those favoring the Highway I access fear that the Oso Flaco access would bring these same types of activities too close to Oso Fiaco Lake's fragile environment. Also, the Highway I access certainly provides 3 much closer access for southbound visitors to the off-highway vehicle area.

After careful consideration of the various alternatives, the California State Park and Recreation Commission, at its December 5, 1974, hearing in Los Angeles, determined that the Highway 1 access provided the best solution for primary access to the Pismo Dunes State Vehicular Recreation

# Secondary Access to Pismo Dunes State Vehicular Recreation Area

There will be two points of secondary access to the vehicular recreation area. One will be via the beach, and the other will be via the existing causeway over Oso Flaco Lake to the Maidenform Flats area. Both routes have long been used by dune riders. The need for additional access routes outweighs the conflicts caused by these routes.

The primary access to the dunes now is via the beach from Pier or Grand Avenue to the sand highway several miles south. Some visitors drive slightly farther down the beach and enter the dunes at other points. As mentioned earlier, the more traffic that can be redirected from the beach to the proposed primary inland dune access, the more the congestion problem will be eased on the beach. The proposed inland access will primarily serve visitors that originate from distant locations. Many local off-highway vehicle operators will continue to drive down the beach and enter the dunes as they have in the past. Trailered vehicles, however, will be directed to the main vehicular area access; thus, the overall result will be a significant reduction in beach traffic to the dunes.

The other secondary access will be across the existing Oso Flaco Lake causeway to Maidenform Flats. Drag race competition events are conducted several times a year in this area, and these events attract large crowds. Approximately half the spectators, plus any special equipment necessary to conduct the events, come into the dunes via the Oso Flaco causeway. The Maidenform Flats area is also a popular camping area, and vacation trailers are sometimes towed over the sand to the camp area. It is proposed that this camp area remain for primitive camping in the dunes.

The corridor that will be used as a thoroughfare to Majdenform Flats has already been modified by man and is not considered significant in natural values. The conflict with this secondary access is that it bisects the Oso Flaco natural area, and the sight and sound of vehicles in this area will not be compatible with the adjacent passive recreational uses. The problem will be insignificant if this access is used on a special use basis only. During the large competition events and for camping access with special equipment, the road could be used for through traffic only.

Neither of the secondary access routes requires the addition of an entrance station. Both routes will be controlled by stations previously discussed.

#### Utilities

No major utility problems are anticipated for this general development plan. Water, sewerage, electricity, telephone service, and solid waste disposal are all feasible.

The Pismo State Beach water supply is currently furnished by the County of San Luis Obispo, County Service Area 13. Future supply for new development will be through the same agency.

Water supply for the proposed overnight and day-use facilities in the vehicular recreation area will be from deep wells constructed by the Department of Parks and Recreation or through possible purchase by agreement with a private industrial source.

Pismo State Beach sewage disposal is through the trunk sewer lines of various cities in the area to the treatment plant of the South San Luis Obispo Sanitary District. Future development sewage disposal will be through the same facilities.

South of Arroyo Grande Creek sanitary facilities for beach camping and day use consist of chemical toilets. The effluent is currently pumped into a Department of Parks and Recreation pumper-trailer and disposed of in sewer lines leading to the South San Luis Obispo Sanitary District Treatment Plant, Future sewage disposal will be by the same method with an alternative disposal on a county-approved land disposal area east of the study area.

Sewage disposal for the camping and day-use areas for the proposed vehicular recreation area will be either by septic tank and leach field, on-site treatment and spray field disposal, or off-site transport if possible in the future.

Electricity and telephone service will continue to be furnished by local utility suppliers at Pismo State Beach. The state vehicular recreation area will be serviced by electricity and telephone facilities available east of the Southern Pacific Railroad tracks.

Solid waste disposal will continue by means of pick-up by local agencies or contractors.

# CARRYING CAPACITY OF INDIVIDUAL ABEAS

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TOYAL					4,280	26,900		31,460	
									1

) EGFND: SB - State Beach SVRA + State Vehicular Recreation Area

<sup>•</sup> Maximum of 8 pursons per unit for overnight use 50 purcent of theach parking provided
••• Not including off-beach parking

# Carrying Capacity

The recreational carrying capacity is the amount of recreation use that an area can support without causing excessive damage to the physical environment and without lessening the recreational experience of the visitor. The design of sanitary facilities, parking, and other support facilities is based on the carrying capacity.

The determination of the recreational carrying capacity is a very complex process. This is particularly true in areas that are involved in the plan. Consider some of the variables at Pismo Beach, such as the changing space available on the flat beach at different tide levels. Or consider some of the variables involved in determining carrying capacity of off-highway vehicles in the Pismo Dunes State Vehicular Recreation Area, such as:

- 1. Number of vehicles operating at any given time (Some operators estimate that only 25 percent of sand vehicles are operating at one time.)
- 2. Range of vehicles (Some vehicles are confined to the harder sand because of tires, motor, and the like.)
- Condition of dunes (soft or hard sand)
- 4. Relief of dunes (Some areas are rarely used while others are heavily used.)
- Type of activity (hill climbing, touring, and so on).

Each of these elements must be considered in determining how many vehicles a given area of dunes can support at any given time.

The carrying capacities for Pismo State Beach and Pismo Dunes State Vehicular Recreation Area are recommended in Figure 9. These are based on regulated capacities used within other units of the California State Park System, together with currently known use patterns, densities, and problems at Pismo State Beach. The figures are not infallible. This is particularly true as relates to off-highway vehicle use, which is a relatively new activity and one with which most agencies have had little experience.

It is imperative that these recommended carrying capacities be carefully monitored, studied, and adjusted as determined necessary to maintain environmental integrity of the resources and a quality experience for the visitor.

# DLAN ELEMENTS



# Pismo State Beach

#### Access

- Provide controlled vehicle access to the state beach using temporary control stations in the initial phase with conversion to permanent facilities in the future. The main entrance station is to be located at Grand Avenue, and an auxiliary entrance station is to be located at Pier Avenue.
- 2. Reduce the number of vehicle access points to the state beach and provide an inner road circulation system connecting overnight use areas, day use areas, and the beach.

# Acquisition

- Through the State Lands Commission, acquire administrative control of tidal lands adjacent to Pismo State Beach.
- Work with the County of San Luis Obispo toward the consolidation of ownership and continuity in administration of county and state recreation lands located between Arroyo Grande Creek and Pier Avenue.
- Work with the County of San Luis Obispo toward the consolidation of ownership and continuity in administration of 140 acres at the northern end of the La Grande Beach tract adjacent to the Pismo Dunes Natural Preserve.
- Acquire lands between Oceano Campground and the beach on the north side of Pier Avenue whenever such lands qualify for purchase under the Department's opportunity purchase program.

# Day Use

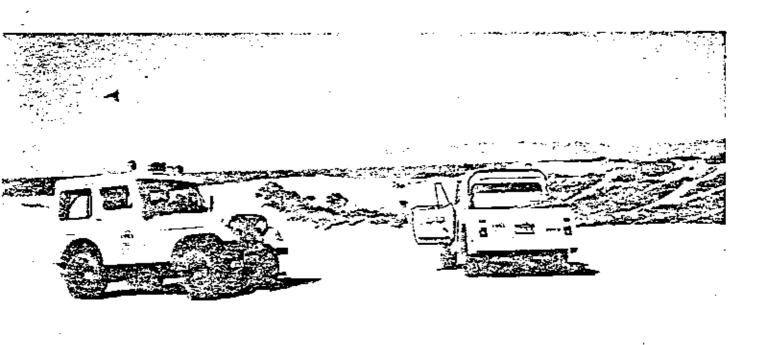
- Provide off-beach parking at Pismo Creek and Pier Avenue with a major facility near the foot of Grand Avenue (520 paved parking spaces plus 400 turfed spaces total for the three locations).
- 2. Work with the City of Pismo Beach in converting beach use between Ocean View Avenue and Grand Avenue to pedestrian use only.
- Enhance Meadow Creek for fishing and other recreational uses through dredging, landscaping, and wildlife enhancement measures
- 4. Provide two off-beach picnic areas, one adjacent to Grand Avenue parking and another adjacent to Meadow Creek (40 picnic sites at each location).
- Provide a system of trails for bicycle riding, hiking, and equestrian use, with bicycle and hiking trails paralleling access roads and connecting use areas.
- 6. Provide a dune arboretum with educational and interpretive facilities.
- Continue existing day-use concession facilities, including golf course, restaurant, and pier-related facilities.
- 8. Provide additional compatible beach-related concession facilities, such as beach equipment rental and beach tram, when warranted by a demonstrated public need.

# Overnight Facilities

- 1. North Beach Campground (100 camp units): Continue present use with development of campfire center, realignment of existing entrance road, removal of existing entrance station, and landscaping for visual screening, wind protection, and aesthetic purposes.
- Oceano Campground (80 camp units): Continue present use with rehabilitation of vegetative screening in specific areas. With the consolidation of park entrance stations at Grand Avenue, the Oceano Campground entrance station would be removed.
- 3. Hostel: Provide hostel adjacent to North Beach Campground.
- 4. Beach camping: Provide 320 camping units in designated areas on the beach south of Arroyo Grande Creek. Reduce the beach camping units to 200 upon development of inland camping in the dunes. Provide portable sanitation facilities on the beach for overnight use, and develop a sanitation station for recreation vehicle waste disposal at the Grand Avenue entrance.

# Administrative Areas

- Maintain existing service yard and employee housing area at present location.
- 2. Provide state beach headquarters office in conjunction with entrance stations at Grand Avenue.



#### Pismo Dunes State Vehicular Recreation Area

#### Access

- Initially provide temporary access to Pismo Dunes State Vehicular Recreation Area from Oso Flaco Road. When feasible, provide an access from Highway 1 in the vicinity of the Union Oil Company refinery.
- 2. For special purpose recreational use in connection with competition events and camping, provide access to dunes via Oso Flaco Lake causeway.

## Acquisition

- For addition to the vehicular recreation area, acquire from the County of San Luis Obispoapproximately 490 acres at the southern end of the La Grande Beach Tract.
- Acquire 1,400 acres of private land, including Union Oil Company properties west of the Southern Pacific Railroad and lands in the vicinity of Oso Flaco Lake, for purposes of developing access and recreational facilities and for protection of scenic, archeological, and natural areas.
- 3. Based on engineering studies for location of a railroad overpass, acquire a corridor of land between the present alignment of Highway 1 and the railroad for future access purposes.
- 4. Acquire 280 acres of Pacific Gas & Electric Company properties west of the Southern Pacific Railroad. Until such time as these lands can be acquired in fee, they should be leased for both active and passive recreational uses.

# Off-Highway Vehicle Use in Sand Dunes

Provide the following support facilities in connection with off-highway vehicle use in the sand dunes:

#### Day Use

- Parking area for parking and unloading of trailered vehicles with turfed area for expansion during peak use periods (150 paved spaces plus overflow turfed parking areas for 500 vehicles)
- Picnic facilities immediately adjacent to parking area and at specific vegetated areas within the dunes (50 sites plus 2 group areas)
- 3. Concession-operated vehicle service and storage area with related food and beverage services.
- 4. Provisions for off-highway vehicle organizations to develop facilities necessary for dissemination of information and registration for and administration of vehicle events.

# Overnight Use

- 1. One back-dune camping area with passenger vehicle access to accommodate 300 camping units
- Four primitive camping areas in the dunes with four-wheel drive access and capable of accommodating 120 camping units
- 3. One back-dune overflow camping area designed to accommodate 380 units during the relatively few days each year on which large numbers of campers congregate in the Pismo area
- 4. One trailer sanitation station

# Passive Recreational Uses in Oso Flaco Like Area

Provide the following support facilities in connection with passive recreational uses in natural areas in the Oso Flaco Lake area (includes Jack Lake, Coreopsis Lake, Coreopsis Hill, and Little Oso Flaco Lake areas):

# Day Use

- 1. Parking area near Jack Lake to accommodate 30 vehicles
- 2. Equestrian parking area to accommodate 20 vehicles with trailers plus a turfed overflow parking area to accommodate 20 vehicles
- Hiking and equestrian trails
- 4. Picnic areas (30 sites)
- Educational and interpretive facilities
- 6. Parking area to accommodate 30 vehicles near Oso Flaco Lake

# Overnight Use

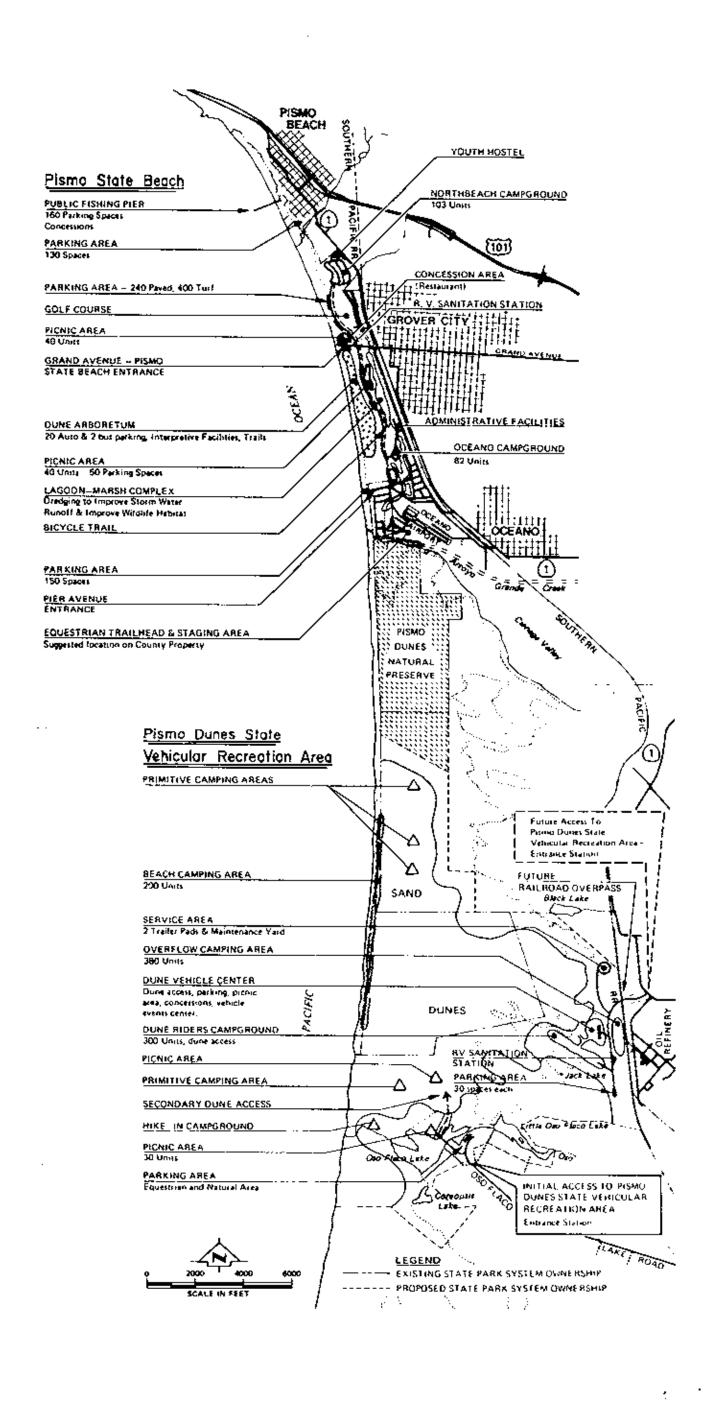
Hike-in campground suitable for family and (small) group use to accommodate 50 persons.

#### Administrative Facilities

- Provide initial-phase entrance station at Oso Fiaco Lake. A future-phase entrance station will be located at Highway 1 access.
- Provide initial-phase maintenance and residence area at Oso Flaco entrance. A future-phase maintenance and residence area will be located at northeastern corner of vehicular recreation area.
- Provide operations center for vehicular recreation area, including control and information center and first aid station

# Fees

The Policies, Rules, Regulations, and Orders of the California State Park and Recreation Commission and the Department of Parks and Recreation states, "The department whenever in its judgment it is practicable to do so, shall collect fees, rentals, and other return for the use of any state park area, the amount to be determined by the department . . .". At Pismo fees are charged for camping at both North Beach Camping and Oceano Campground. A fee is also charged for camping in the designated beach camping area. There are no day use fees at present. The Commission has approved the resource management and general development plans with the conditions that no charge be made for day use of the beach. Another condition is that no charge be made for off-road vehicles being towed or conveyed to the vehicle recreation area. Both of these conditions were agreed to by the department and are in effect today.



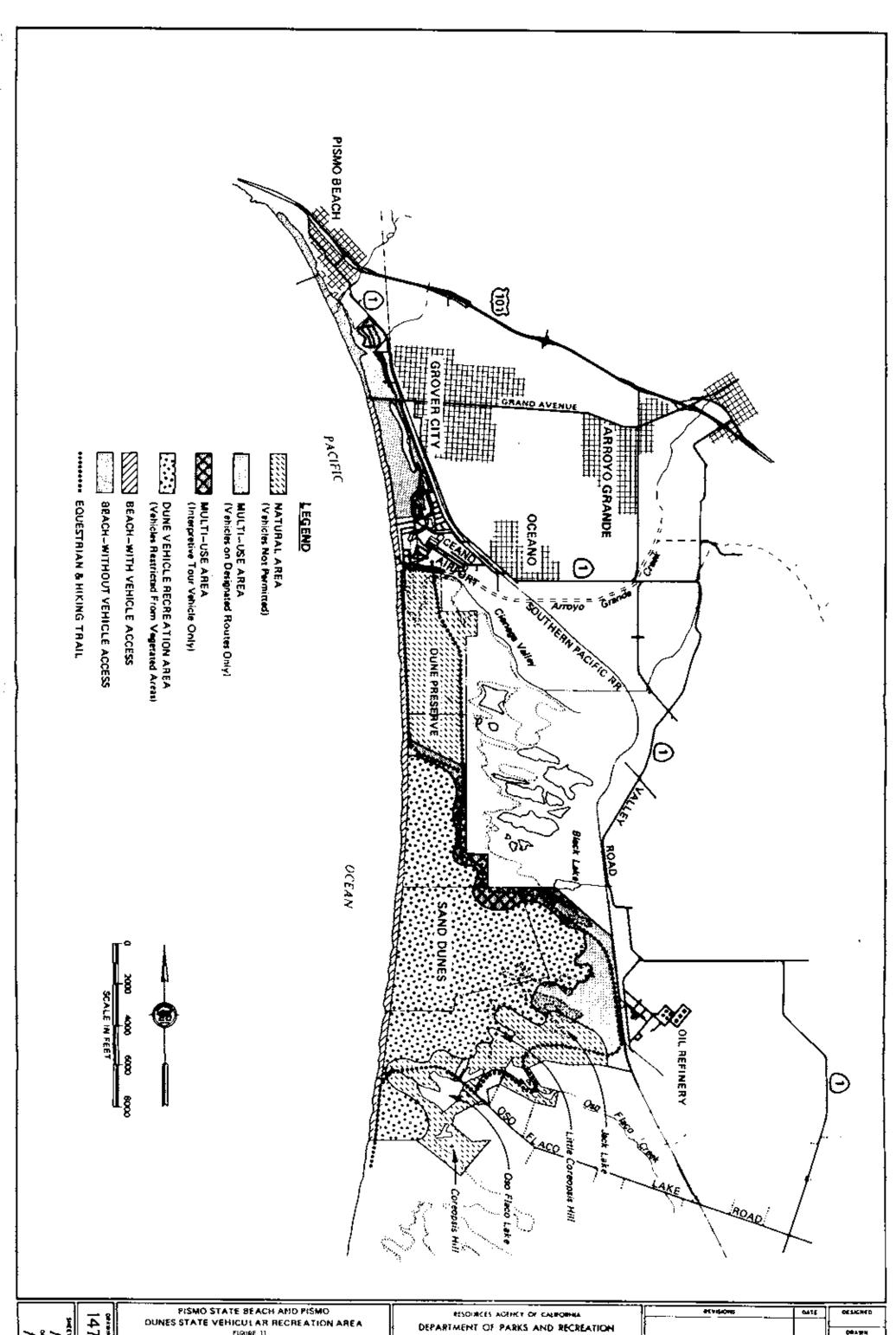
PISMO STATE BEACH AND PISMO
DUNES STATE VEHICULAR RECREATION AREA

FIGURE 10

GENERAL DEVELOPMENT PLAN

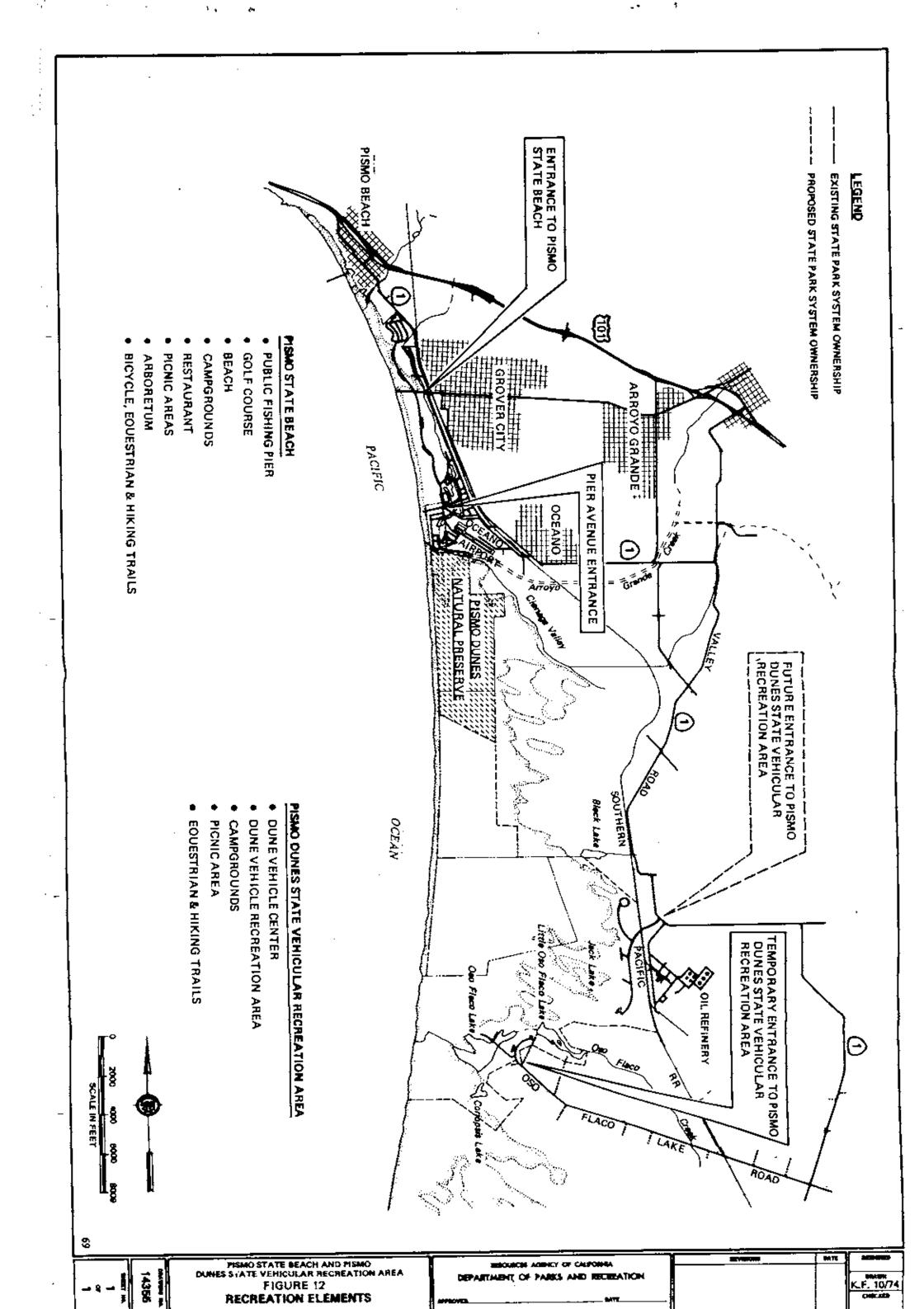
RESOURCES AGENCY OF CALMONIA
DEPARTMENT OF PARKS AND RECREATION

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FIGUAE 11 LAND USE PLAN

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# Figure 13

# SEQUENCE OF PLAN IMPLEMENTATION

# Pismo Dunes State Vehicular Pismo State Beach Recreation Area Establish temporary contact stations at Pier Avenue and Grand Avenue. o. On major holidays place contact stations at Ocean View Ave. and Oso Flaco Road. o Establish primitive dune campgrounds on o Construct Recreation Vehicle sanitation lands recently acquired from P.G.&E. station at Grand Avenue. o Upon transfer of County dune lands to o Maintain all existing developments in-State, establish primitive dune campcluding 320 beach campsites. grounds and modify boundaries of dunes natural preserve. a Acquire Union Oil property west of the railroad and establish primitive camparounds. Acquire other key properties in the vicinity. o Establish parking area at Pismo Creek and of Oso Flaco Lakes. Pier Avenue. o Construct Grand Avenue entrance station, Acquire sand dune portion of P.G.&E. pro-Headquarters Office, picnic area and beach perty west of railroad. parking area. o Connect North Beach Campground with o During period of acquisition provide tem-Grand Avenue entrance road. porary access to vehicular recreation area o Construct bicycle trail concurrently with via Oso Flaco Road. Utilize margin of agriroad system. cultural land for interim facilities. Construct youth hostel. Discontinue Ocean View access ramp. o Extend non-vehicular play beach south to o Develop Highway No. 1 access to vehicular Grand Avenue. recreation area and facilities, including: day Reduce number of beach campsites to 200. use staging area, campgrounds, administrative area and trailer sanitation station. o Construct South Grand Avenue project which includes the following: establisho Develop support facilities for Oso Flaco ment of Marsh Lagoon complex, picnic Lakes Natural Area; Hike-in Campground, area, dune arboretum, bicycle/hiking trails, equestrian staging area, picnic area, interinterpretive display and access road to pretive facilities and trails. Oceano Campground. o Establish interpretive beach and dune tour.

## Environmental Impact Report

The description of the project is contained in the preceding chapters of this report. This chapter will discuss the environmental impact of the proposed project.

## Environmental Impact of the Proposed Action

The environmental impact of the proposed project would be caused primarily by construction activity, physical development of the land, and the concentration of people and activities within certain areas of the project.

The construction of facilities such as roads, trails, restrooms, campsites and administrative facilities, would cause short-term environmental impacts, including dust, noise, and increased vehicular traffic.

After completion of the construction phase, long-term impacts would be realized. These would be largely in the form of physical features, such as walks, roads, parking areas, and miscellaneous single-story structures. Long-term impacts would also result from the concentration of people, vehicles, and activities within certain areas of the project. Possible long-range impacts on the existing natural environment, private and public services, and community health and safety are discussed in the following sections.

#### Effects on Soils

The accelerated rate of dune movement caused by vehicular use on active dunes is unknown but should be minor compared to overall natural dune movement.

Some changes in dune shapes will occur with heavy vehicle use; however, these changes will be temporary and minor compared to the overall natural changes constantly taking place in the dunes.

# Effects on Vegetation

Within certain areas of the active sand dunes, some acceleration of dune vegetation loss will occur. In others the control of off-highway vehicles will allow vegetation to reestablish itself. Some of the native and introduced vegetation will be removed from the site to accommodate roads, trails, structures, campsites, and picnic areas. Within the preserve areas, native vegetation will be protected.

## Effects on Wildlife

Off-highway vehicle use has already had an impact on the wildlife. In three areas in which off-highway vehicle use has been regulated or reduced, wildlife populations should increase.

Clamming and fishing activities are under the jurisdiction of the Department of Fish and Game and will be regulated by that Department. This proposal will not have an effect on clamming or on the clamming resources. Dredging will increase the freshwater fish habitat in the Meadow Creek lagoon area. In addition, access to the Oso Flaco lakes will be improved, and the number of fish taken by anglers should therefore increase in the project area.

# Effects on Scenic or Visual Quality

The project area is essentially open space and will remain so. Visual impacts will be realized by the continued intrusion of man and his vehicles in the solitary dunes and on the broad open beach. A visual impact will also be realized in camping areas and other areas in which facilities are constructed.

# Effects on Private and Public Services Demanded

Several public and private service demands are expected to result from the project. These demands include the following:

- Travel on county roads will require additional improvements and widening.
- 2. Maintenance of campgrounds, concessions, and day-use areas will demand the resources of local individuals.
- On-site construction will demand local labor supplies and will temporarily increase local employment.
- Restaurants in the local area are expected to receive additional clientele from the state beach and vehicular recreation area visitors.
- Although many visitors will bring the majority of food staples with them, the sale of incidentals and beverages at local grocery stores will increase.
- 6. Dune buggy repair, auto repair, service, and fishing supply outlets will receive additional income.
- Additional park personnel will require the full range of public and private services.

# Effects on Demands for Law Enforcement and Fire Fighting Services

Law enforcement. Criminal activity within the project is expected to decrease with the placement of entry stations. The Department has found manned entry stations at vehicle access points to be the single most effective deterrent to criminal activities within parks.

The few popular holiday weekends now create extensive enforcement problems. These problems should decrease when the number of visitors to the project is more stable and when the entry stations are developed.

Fire control. The project is not expected to present fire hazards. Some fire control assistance will be available; however, public assistance would be required if a major fire were to occur.

# Effects on Community Health and Safety

If beach day use and beach camping were to result in the depositing of raw sewage on the beach, possible health problems would exist. Visitors might be directly affected by exposure to the waste material, and they might be indirectly affected by eating contaminated Pismo clams that had fed on raw sewage. Realizing these potential health problems, the Department will provide adequate sanitary facilities and will strictly enforce sanitary regulations to ensure that solid and liquid wastes will not be deposited on the beach.

# ANY ADVERSE ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSAL IS IMPLEMENTED

A loss of some open space and low-quality agricultural land will occur if the project is implemented. Some vegetation and wildlife within the developed areas will be displaced.

A minor local increase in air pollution, noise levels, and traffic will occur as a result of this project. In addition, some visual intrusion on the landscape and surface change in sand dune shapes will also occur.

# MITIGATING MEASURES PROPOSED TO MINIMIZE THIS IMPACT

Measures proposed to minimize the impact are as follows:

- 1. The Department will proceed with a study of off-highway vehicle use on the coastal sand dunes. The following items will be studied.
  - a. The types of changes occurring in the dunes and the rate of change
  - b. The short-term and long-term effects of various management techniques
  - c. Possible management techniques to reduce the impacts of off-highway vehicle use; i.e., noise reduction
- 2. Landscaping will be used to minimize soil erosion, screen proposed buildings, offer wind protection, and improve the aesthetic qualities of the site. Plants will be chosen to harmonize with the surrounding landscape and tolerate special environmental conditions.
- 3. Parking areas and hiking and bicycle trails will be designed to encourage motor vehicle users to park their automobiles and walk or ride bicycles to their destinations.
- 4. The proposed beach tram will provide access to the beach and to points along the beach from various locations. This transportation system will provide the option of access by means of a motorized vehicle without the use of individual motor vehicles.

# ALTERNATIVES TO THE PROPOSED PROJECT

Alternatives to the project include first, no action; second, state beach development only; and third, vehicular recreation area development only.

- 1. No action: If this project or a similar one is not implemented, the project area will continue to develop as it has in the past, with very little regulation of off-highway vehicle use.
- State beach development only: Most of the beach-related activities would be well controlled, and the majority of existing conflicts would be eliminated. However, the vehicle-related problems would not be solved.
- Vehicular recreation development only: A statewide vehicular area would be designated and controlled, but the state beach would continue basically as it is now, with related congestion and use problems.

The state beach and vehicular recreation area are interrelated, and there is a great deal of overlap of activity between the two units. Any planning or development proposal must consider both units.

### Recommendations

The following recommendations are included in this report as alternative design measures to further minimize any significant environmental impacts:

- Maintain native plants wherever feasible.
- 2. Limit vehicular use wherever practical or feasible.
- Reduce congestion problems on the beach by providing alternatives to vehicle access.
- 4. Provide direct access and proper signs from the freeway system to the project entrances.
- Develop in cooperation with local communities and the country a flood control and drainage district.

# RELATIONSHIP BETWEEN SHORT-TERM USES AND LONG-TERM PRODUCTIVITY

The project site is essentially open space under public ownership. The intent of this plan is to preserve this open space for future generations while providing minimal facilities so that the site can be better used for recreational purposes.

Some marginal agricultural land will be used for recreation base facilities. Other areas suitable for residential or industrial development will be ocquired by the Department and preserved as open spaces.

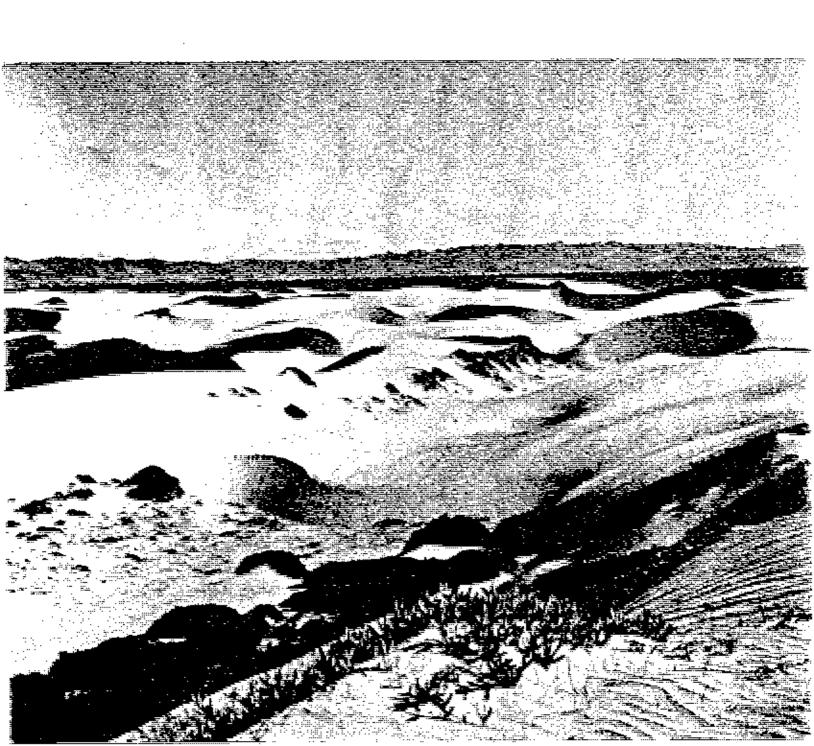
# ANY IRREVERSIBLE ENVIRONMENTAL CHANGES AS A RESULT OF THE PROPOSED PROJECT

- 1. Conversion of open space to campground roads, picnic areas, and other facilities
- 2. Conversion of some lower-quality agricultural land to recreational use
- Changes in land form as a result of grading for roads, parking areas, building sites, pionic
  areas, and lagoons
- Commitment of resources, such as lumber, cement, oil, gravel, and gasoline to paving of roads, parking areas, and bicycle trails and the construction of campsites and buildings

#### GROWTH-INDUCING IMPACTS

There would be an increase in visitors to the project area for vacations. This would slightly stimulate the local economy. There would also be a slight increase in local traffic and some pollution as a result of the project.

# **ADDENDIX**



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# Copy of a Letter from the SOUTH CENTRAL COAST REGIONAL COMMISSION dated March 12, 1975

William Penn Mott, Jr., Director State Department of Parks & Recreation P. O. Box 2390 Sacramento, CA 95811

Dear Mr. Mott:

On February 27, 1975, this Regional Commission approved The General Development Plan for Pismo State Beach, with the following terms and conditions:

- This approval represents conceptual approval
  of the plan as presented, but does not extend
  to any of the actual development contemplated
  pursuant to the plan. Such development shall
  be the subject of separate permit applications
  at such time as it is actually undertaken.
- 2. On-beach camping shall be restricted to no more than the proposed 320 (to become 200) campsites at all times. Each campsite shall be limited to no more than 8 persons. Overflow camping on the beach (between the water's edge and the first dune) shall not exceed 500 sites in 1975, and the number of sites shall be reduced 100 each year until no temporary or overflow campsites are provided on the beach in 1980.
- 3. At such time as a competent public agency has empirical data showing a clear and present health threat either to human beings or to the Pismo Clam resource, which threat is attributable to on-beach camping, this Commission reserves the right to withdraw its permit approval of the physical facilities necessary to accommodate on-beach camping.
- 4. The closure of the Ocean View Avenue access ramp shall be effected only after a State-funded study of the economic impact of such closure on the local merchants has been completed and subjected to full public hearing.

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- 5. Access "A" shall continue to be the preferred dune access route. The proposed perioheral road connecting Access "A" with Access "B" shall not be built; all as delineated on Figure 9, page 55, of The General Development Plan.
- 6. As the Department of Parks and Recreation acquires ownership of or control over property abutting that of the Dune Lákes Associates, a buffer zone shall be created in conformance with the natural topography. The buffer zone shall be no less than 500 feet in width at any point, unless the Director of Parks and Recreation, the Executive Director of this Regional Commission, and the adjoining landowner mutually agree on a lesser distance. No motorized vehicles or horses shall be allowed in this buffer zone. The buffer zone shall be posted and patrolled by the California Department of Parks and Recreation.
- The day-use parking lot north of Grand Avenue is not approved as submitted. Instead, nearby alternate locations should be studied.
- The interior road connecting Oceano Campground and the Northbeach Campground is not approved.
- Day-use fees shall not be collected at Pismo State Beach.
- 10. The Department of Parks and Recreation as part of its Resource Management Program and in cooperation with the County of San Luis Obispo, shall survey the dune structure along the coastline under its jurisdiction to determine the extent of vegetation damage on these dunes.

The Department with the approval of the County as to areas owned by it, shall limit points of access to the dunes south of the Sand Highway by posting or other suitable means to allow vegetative recovery in that area. All persons entering the State Beach shall be informed of the access limitation and reasonable patrols maintained to enforce such access limitation.

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When the Department wishes to undertake specific developments pursuant to the General Development Plan, applications therefore will be processed as Administrative or Consent Calendar Permits pursuant to the Commission policy above described.

Sincerely yours,

**/s/** 

F. C. Buchter Executive Director

FCB/eaw

cc: Robert Uhte

M. Frinke

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# **ACKNOWLEDGMENTS**

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Department of Fish and Game

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Santa Maria Soil Conservation Service