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

Th3

CDP 4-82-300 (Oceano Dunes CDP Review)
March 18, 2021
CORRESPONDENCE

Table of Contents
Public Correspondence Received Since July 11, 2019

Singular

Pines <pinesiimm@verizon.net>

Tue 2/16/2021 10:05 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I believe anyone who spends 20 minutes walking on the pathway at Oso Flaco will be convinced the proposed development would destroy the beauty, peace, and PURPOSE of the area.
Sent from my iPhone

Fwd: eBird -- Oso Flaco Lake (not for beach/ocean) -- Jun 23, 2019

Patricia Furtado <patriciafurtado06@gmail.com>

Tue 2/16/2021 8:00 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

This is a list of birds seen at Oso Flaco Lake in one hour by my son.

---------- Forwarded message ---------
From: **Patrick Furtado** <pfurtado@berkeley.edu>
Date: Mon, Jun 24, 2019, 8:02 AM
Subject: eBird -- Oso Flaco Lake (not for beach/ocean) -- Jun 23, 2019
To: Patricia Furtado <patriciafurtado06@gmail.com>

Oso Flaco Lake (not for beach/ocean)
Jun 23, 2019
4:27 PM
Traveling
0.25 miles
60 minutes
All birds reported? Yes
Comments:

1 Cinnamon Teal
2 Gadwall
6 Mallard
2 Pied-billed Grebe
12 American Coot
1 Least Tern
3 Double-crested Cormorant
1 Glossy/White-faced Ibis -- Observed for ten minutes feeding in shallows near boardwalk.
1 Osprey
1 Black Phoebe
10 Tree Swallow
4 Barn Swallow
8 Bushtit
6 Marsh Wren
1 Swainson's Thrush
1 Song Sparrow
4 Common Yellowthroat
2 Wilson's Warbler

Number of Taxa: 18

(No subject)

Patricia Furtado <patriciafurtado06@gmail.com>

Tue 2/16/2021 7:52 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please do not allow the desecration of the Oso Flaco/Oceano Dunes proposed by the State Parks department. My husband and I , as well as our children, have loved and enjoyed for decades the quiet beauty of that area and its varied wildlife. It should be preserved as it is.

Proposal for Development of Oceano Dunes

Patricia Furtado <patriciafurtado06@gmail.com>

Tue 2/16/2021 7:39 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

As local longtime lovers of and visitors to Oso Flaco Lake and the dunes nearby, my husband and I were appalled to hear about the plans to build a huge campground there. It is a beautiful but fragile area with many, many species of wildlife. All that will be destroyed by crowds of noisy, destructive, and trash-leaving campers. Up until now it has been a quiet haven for wild creatures and humans in small numbers to visit. There are other purposes than money making and places to ride noisy, smelly, and dust creating vehicles for this area. Oso Flaco is an oasis which will become a wasteland if that project goes through. STOP THE DEVELOPMENT OF OCEANO DUNES AND OSO FLACO LAKE.
Sincerely,
Albert and Patricia Furtado
Santa Maria, California

Oceano beach area

Nancy Bull <anybull@gmail.com>

Tue 2/16/2021 7:02 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Since state parks has been grading the ocean floor at low tide and piling sand on the beach they have created another playground for off-roaders with pickup trucks to race up and down and over open sand piles they built up there. This pushes more sand into the air and our lungs here and creates a noisy night and day revving of engines, often a 3 lane raceway for the off-roading trucks that are permitted now. It also destroys further what was our "beach""...formerly our beach front was similar to that in Pismo and Avila...a lovely wide stretch of sand to enjoy now marred with huge piles of free flowing sand being thrown up by trucks playing up, over and through it!

The grading has also cut off the creek from flowing into the ocean by piling sand up to create large stagnant ponds instead of open water to the sea. Please require State Parks to restore our beach to a beach instead of another destructive offroading playground.

Please act to protect our ocean, our health and our recreational opportunities.

Nancy Bull

Oceano, CA

Protect Oceano Dunes!

Sandra Heller <sandih5@sbcglobal.net>

Tue 2/16/2021 6:59 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

State Parks plan is terrible. It desecrates Oso Flaco and hugely expands off road vehicle use. Studies done during the closure show that the economic impact to Oceano was minimal, and the beach was widely enjoyed by walkers, bikers and horseback riders.
Please stick to your plans to require State Parks to lessen the impact on the dunes, instead of increasing it.
Sincerely,
Sandra Heller
San Luis Obispo

Sent from AT&T Yahoo Mail on Android

Please close the Oceano Dunes to vehicles

Abrah Younger <abrahrising@gmail.com>

Tue 2/16/2021 6:54 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; OceanoDunes.PWP.EIR@parks.ca.gov <OceanoDunes.PWP.EIR@parks.ca.gov>

As a social worker and a resident of Arroyo Grande, I have a deep understanding of the thoughts and emotions of those who love to access the dunes and beach with their vehicles. In one case, my neighbor educated me on how he had grown up with access to the beach and dunes with his family's vehicles and his own off-roading vehicles. It is his passion and something he shares now with his own family.

I realize he and others may never accept a limitation placed on residents. It is clearly an unpopular stance. Yet the majority of local residents are not likely to understand the science behind ecosystems, and their resulting fragility and destruction. Science is not a myth; it is our best understanding of the reality that we live within. We have more than enough evidence of the harm done by vehicles operating within the dunes. It has been presented repeatedly.

Can we evolve enough to focus on the health and well-being of our environment, rather than to appease those who enjoy the recreation of driving on the beach? Ultimately, which is more important? The pleasure of humans or the ecological balance and health of our environment/

Thank you for listening,
Beverly Abrah Younger

Yes! Some Sanity, Finally!

Rachel <rleebross@gmail.com>

Tue 2/16/2021 4:55 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>
Cc: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Wright Michaela <michaelawright12@gmail.com>; Wright Sarah Frances Bross <sfbwright@gmail.com>

Commissioners-

Please support your staff recommendations regarding Oceano Dunes. Say yes to:

1. Providing camping between Grand and Pier Aves.
2. Shutting down the Pier Avenue ramp and eliminating all vehicles south of Pier.

This is a great start to giving a bit of sanity and respect to the Coast at Oceano Dunes. The pandemic has shown us that beach use by people without vehicles at Oceano Dunes has increased use and enjoyment for the community!

Thank you, and we support you as you vote to support your staff's recommendations on this project.

Rachel Bross, Michaela Wright, Sarah Wright

Oceano Dunes

Anne Godsey <aegodsey@yahoo.com>

Tue 2/16/2021 4:33 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear chairman Padilla and Commissioners,

I am writing in regard to the conversation regarding Oceano Dunes. I have spent my life living along different sections of the gorgeous California coast. People come from all over the world to experience the natural wonders and beauty of this spectacular coast line that runs 840 miles along the Pacific Ocean. Sadly, this natural wonder is eroded starting at the Baja border and heading north.

As a child growing up in San Diego, and camping with my family at State Parks, I believed I could always count on the State Park organization to preserve the beauty and wonder for my grandchildren. This is where I learned about the plants and animals, astronomy, geology, and Indian culture. This is where I learned how to preserve nature and honor history. As campers, we were taught this by rangers, by parents, and by observation. This is where we learned to love and interact with the elements of the life cycle.

I have never thought that State Parks was in the business of recreation unless it afforded the experience of education, peace and beauty. I have volunteered for State Parks for the past 5 years and I am afraid that the philosophy has changed. It is diverging from nature toward a philosophy that, in order to satisfy the people in California, we must allow our environment to be disrupted and our wildlife disturbed. It allows for the pollution of air and noise to take over and infiltrate our peace and wonder. It breaks my heart that at the age of 72 I am watching my childhood memories tarnish, and the one thing I can claim that is still good in this world is disappearing.

I realize and respect that recreational vehicles are fun and exciting and great family events. I have experienced many such family trips in the past. A good job was done to corral the activity to designated areas so as to preserve the beauty of the deserts. Please let vehicle owners continue to have designated areas that are far away from cities, and from concentrated wildlife areas — away from migratory areas and in places where noise and air pollution will not compromise the area. This is my wish.

Thank you for taking the time to read this.
Respectfully yours,
Annette Godsey
Morro Bay, California

Concern over proposed developments at Oceano Dunes

Michael Mulroy <mdmulroy21@gmail.com>

Tue 2/16/2021 3:58 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Hello,

I am writing to express concern about the developments proposed for Oceano Dunes. Oso Flaco Lake as well as the dune habitat is still relatively unspoiled and provides critical habitat for many sensitive bird and plant species. Oso Flaco Lake is also one of the best birding areas in the county. I believe much of the current proposed development of the area would lead to degradation of habitat which would not only harm wildlife and natural resources, but also tarnish what makes the area unique and special.

Thanks for your careful consideration in this matter.

Michael Mulroy

--
Michael D. Mulroy
Mobile: (805) 755-9363
mdmulroy21@gmail.com

Short & Sweet

Jeannie Mello <purrs8@verizon.net>

Tue 2/16/2021 2:57 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I watched the February 15, 2021 presentation. I have but two things to say:

1. If it ain't broke ... don't fix it!!

2. Kudo's to Kara Woodruff.

DON'T MESS WITH PERFECTION!!!

please protect the very special oceano dunes

Patricia Arnold <parnold90@icloud.com>

Tue 2/16/2021 1:50 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I was born and raised in San Luis Obispo County and I lived in Oceano for a number of years. I have loved these dunes since I was a small child. Their sculptured beauty and fragile plant and animal life has given me a lifetime of pleasure. It was later that I learned that this unique landscape had an amazing history with the Chumash and later the Dunites. We should not be willing to sacrifice such a rich and beautiful landscape for a drive through parking lot. The impact of the noise, fumes and damage from vehicles is devastating. We need to preserve this environmental and historical treasure for future generations and I would urge you to keep these dunes protected and undisturbed for future generations to study and discover. Recreational vehicles will leave only damage and garbage behind. Let us make a commitment to beauty and history as well as the future.

Patty Arnold
pattyarnold.com
Fine Art and Photography
Menagerie Design and Publishing
menageriedesign.net

To whom it concerns,

The following are my prepared comments opposing the use of vehicles on the beach and in the dunes of the Oceano-Guadalupe Dunes area. The actions during the last several decades by the State Parks has been and remains with their new proposed plans contrary to their stated mission to first protect the environment and cultural resources under their guardianship before providing recreational opportunities.

I have been a resident in the 5-Cities area of San Luis Obispo County since 1975. I have lived with my wife and daughter (until she moved away for college) in Oceano since 1983. I am an internationally published poet, writer, visual text artist and photographer. Beach and dune patterns and scapes have been part of my published subject matter upon moving here. My newest book, published in Australia, is a collection of beach textures on vehicle-free Oceano Beach near the mouth of Arroyo Grande Creek. It is a homage to the Dunites. It would not exist if the beach had been open to traffic. Since 1977 I have been actively pursuing environmental protection issues including nuclear energy, Chumash sacred sites, off shore oil extraction, pesticide drift, and development of a national marine sanctuary protecting nearshore and offshore waters south of Point Conception to Santa Rosa Creek.

In 1990 I was hired on contract for a year as an energy planner by San Luis Obispo County to help protect the county's environment and economy against offshore oil development. I was also assigned the task of preparing a nomination document for a national marine sanctuary off our nearshore and offshore waters. A segment of its findings helped support the extension of the Monterey Bay National Marine Sanctuary to Santa Rosa Creek in our county. I continued the effort with local environmental groups. The proposed and nominated Chumash Heritage National Marine Sanctuary may soon become a reality; its possible headquarters could be in Oceano as an anchor for green tourism.

My comments derive from experiencing the negative impacts of these permitted activities which are in my opinion contrary to the Coastal Act and the mission of State Parks.

Sincerely yours,

Karl Kempton,

Oceano, California

The Significance of the Oceano-Guadalupe Dunes and the Negative Environmental, Social and Economic Impacts of Vehicles Permitted on the Beach and in the Dunes

For decades the California Department of Parks and Recreation has ignored the negative and in some cases severe negative impacts of the off road vehicle traffic of an annual average of 2.2 million trips on Oceano Beach and in the Oceano dunes. These negative impacts add additional stress to the already stressed large numbers of state and federally threatened and endangered plant and animal species. Another negative impact has been the lack of protection of the Chumash sacred sites and cultural zones within the dunes for decades. Other negative impacts are economic, social and environmental consequences for the community of Oceano and surrounding communities. Ignoring, or as some assert supporting these consequences, are contrary to the department's stated mission. Protection and preservation of habitat, wildlife and cultural resources (in the dunes these would be Chumash) are mandated as higher priorities than recreation (underline mine):

> The California Department of Parks and Recreation ("State Parks") protects and preserves California's most significant natural and cultural resources while delivering public spaces to bring families and friends together. California's state parks provide a wide array of recreational opportunities for everyone's benefit and enjoyment. State Parks' legal mandate is articulated in its mission "to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation."

The Place of the Oceano-Guadalupe Dunes

The largest California coastal dunes complex and the state's second largest dune complex, the Oceano-Guadalupe Dunes, with its wetlands, endemic flora, birds and sea and land mammals and haulouts, was designated a National Natural Landmark in 1980. The landmark consists of two contiguous areas: 1) The Oceano – Guadalupe Dunes, which are fed by sand carried by offshore currents circulating in a littoral cell in San Luis Bay; and, 2) Point Sal, one of the last remaining pristine, rocky coastlines on the South Coast. This dune complex also maintains the highest measured dune along the entire West Coast of the U. S.

The dunes have immeasurable ecological and scenic value along with educational and scientific importance and represents one of the few coastal areas in the state still in an undisturbed condition, excluding the designated recreational areas which in some areas the California Department of State Parks has allowed complete obliteration of large swaths of flora and foredunes. Such destruction thus destroyed habitat for threatened and endangered fauna and the unknown destruction of specific threatened and endangered species of flora. There are beaches, headlands, estuaries, and lakes. Many plants are rare; a high percentage are endemic to the area. There are 22 listed state and Federal threatened or endangered plants species and 20 animal species.(see list at end of this section). At least 186 species of water and terrestrial birds have

been recorded, including the Least Tern, the Peregrine Falcon and the Southern Bald Eagle. The expressed planned expansion into protected areas is contrary to the stated goals of the State Parks mission and should be prohibited.

Combined geological, meteorological and oceanographic forces shaped and maintain this land and seascape and their integrated and complex ecosystems. The geological forces include the long history of tectonic plate movement, subduction and fragmentation of plates into microplates.[1] Two microplates, the Farallon Microplate to the South and the Monterey Microplate to its immediate north meet at the Arguello Canyon. The sea canyon is one of several geological land and ocean floor features caused by these forces. A combination of these features, including the coastal directional change at Point Conception from North-South to East-West, the Southern California Bite, the Channel Islands and the Santa Lucia upthrust block, in association with the meeting of several ocean currents, all contribute to the formation of the only persistent upwelling along the U. S. West Coast. The persistent upwelling provides nutrients entrained in the three mile wide pole-bound Davidson current nourishing nearshore and tidal dependent micro flora and fauna creating a portion of the foundation for the lush web of life found in the area.

The meteorological conditions of the area are powered by the confluence of the meeting of two meteorological providences, the northern Oregonian and the southern Californian providences.[2] The demarcation line is Point Conception with northern and southern transition zones being one degree of latitude in each direction. The two oceanographic providences follow the identical outline. These features influence the area’s high number of overlapping species from each of the providences leading to the high density of threatened and endangered species inhabiting the dune and beach complex.

The unique combination of semiarid and aquatic conditions with a climatic and oceanographic transition zone provides a wide variety of habitat and of associated plant and wildlife species. Coastal dunes, freshwater marshes, riparian habitat, coastal salt marsh, woodland, mudflats, beach, open water, and areas of transition between habitats provide a diversity of life uncommon to much of California.

The drainages of separate watersheds contribute to the wetland complex. The 1,880 square mile Santa Maria River drainage is one of California's largest coastal river basins. Extensive, tidally influenced wetlands sit at the river’s mouth. The river’s historic flood plain holds the Oso Flaco Lakes and their associated coastal wetlands. The 10 existing dune lakes are likely remainders of the freshwater bay.

About 186 species of water-associated birds have been recorded in the wetlands of the Oceano – Guadalupe Dunes Complex. Shorebirds, waterfowl, gulls, terns, pelicans, cormorants, coots, rails, loons, gerges, herons, and egrets are among those counted. Least Terns nest and raise fledglings near the Santa Maria River mouth and the Oso Flaco Lakes, Brown Pelicans roost at the shore, and Snowy Plovers inhabit the beaches. Over 100 terrestrial bird species occur among the dunes and related habitats. Among these are the endangered Peregrine Falcon and the Southern Bald Eagle.

Several plant species are found nowhere else. Two species, one aquatic and one terrestrial, reach their extreme limits with the Point Sal - Oceano – Guadalupe Dunes complex. At least eight

species occurring in the dunes have been listed by the California Native Plant Society as "very rare" and "rare and endangered."

Nearly 50 species of mammals and 33 species of amphibians and reptiles inhabit the dune region. Though not in great numbers, fish are found in the lakes. There is a wide diversity of invertebrates. And the Pismo clam, subject of much recreational and scientific attention, is found along the beaches. Of the fish, the steelhead require easy entrance to Arroyo Grande Creek. State Parks without permits altered the natural course and thus flow of the creek into the ocean. The purpose of this change was for easier access to the beach for vehicles. The consequences to the steelhead are unknown.

Below are two charts detailing the numbers of threatened and endangered species in the dune complex. These species are essentially provided lip-service protection by the State Parks in this area. It is quite apparent the department in this geographical location have reversed its mandate and prioritized recreation over protection of cultural resources and threatened an endangered species. Further proof of this is their willingness to expand off road activities into environmentally sensitive and protect areas.

Federally and State Threatened, and endangered, protected, rare species for Oceano Dunes

Scientific Name	Common Name	ESA Status	Global Rank	State Rank	Rare Plant Rank
Agrostis hooveri	Hoover's bent grass		G2	S2	1B.2
Arctostaphylos pilosula	Santa Margarita manzanita		G2?	S2?	1B.2
Arctostaphylos rudis	sand mesa manzanita		G2	S2	1B.2
Arenaria paludicola	marsh sandwort	FE/ SE	G1	S1	1B.1
Castilleja densiflora var. obispoensis	San Luis Obispo owl's-clover		G5	S2	1B.2
Chenopodium littoreum	coastal goosefoot		G1	S1	1B.2
Cirsium rhothophilum	surf thistle	ST	G1	S1	1B.2
Cirsium scariosum var. loncholepis	La Graciosa thistle	FE/ST	G5	S1	1B.1
Cladium californicum	California saw-grass		G4	S2	2B.2
Clarkia speciosa ssp. immaculata	Pismo clarkia	FE	G4	S1	1B.1
Delphinium parryi ssp. blochmaniae	dune larkspur		G4	S2	1B.2
Dithyrea maritima	beach spectaclepod	ST	G1	S1	1B.1
Erigeron blochmaniae	Blochman's leafy daisy		G2	S2	1B.2
Horkelia cuneata var. puberula	mesa horkelia		G4	S1	1B.1
Horkelia cuneata var. sericea	Kellogg's horkelia		G4	S1?	1B.1
Lupinus nipomensis	Nipomo Mesa lupine	FE/ SE	G1	S1	1B.1
Monardella sinuata ssp. sinuata	southern curly-leaved monardella		G3	S2	1B.2
Monardella undulata ssp. crispa	crisp monardella		G3	S2	1B.2
Monardella undulata ssp. undulata	San Luis Obispo monardella		G2	S2	1B.2
Nasturtium gambelii	Gambel's water cress	FE/ ST	G1	S1	1B.1
Nemacaulis denudata var. denudata	coast woolly-heads		G3G4	S2	1B.2
Orobanche parishii ssp. brachyloba	short-lobed broomrape		G4?	S3	4.2
Scrophularia atrata	black-flowered figwort		G2?	S2?	1B.2

Scientific Name	Common Name	ESA Status	Global Rank	State Rank	CDFW Status
Ablautus schlingeri	Oso Flaco robber fly		G1	S1	
Accipiter striatus	sharp-shinned hawk		G5	S4	WL
Anniella pulchra	northern California legless lizard		G3	S3	SSC
Areniscythris brachypteris	Oso Flaco flightless moth		G1	S1	
Athene cunicularia	burrowing owl		G4	S3	SSC
Bombus caliginosus	obscure bumble bee		G4?	S1S2	
Charadrius alexandrinus nivosus	western snowy plover	FT	G3	S2S3	SSC
Chlosyne leanira elegans	Oso Flaco patch butterfly		G4G5	S1S2	
Danaus plexippus pop. 1	monarch - California overwintering population		G4	S2S3	
Emys marmorata	western pond turtle		G3G4	S3	SSC
Eucyclogobius newberryi	Tidewater goby	FE			
Laterallus jamaicensis coturniculus	California black rail	ST	G3G4	S1	FP
Lichnanthe albipilosa	white sand bear scarab beetle		G1	S1	
Oncorhynchus mykiss	South central coast steelhead	FT			
Phrynosoma blainvillii	coast horned lizard		G3G4	S3S4	SSC
Plebejus icarioides moroensis	Morro Bay blue butterfly		G5	S2	
Rana draytonii	California red-legged frog	FT	G2G3	S2S3	SSC
Sternula antillarum browni	California least tern	FE/ SE	G4	S2	FP
Taxidea taxus	American badger		G5	S3	SSC
Thamnophis hammondii	two-striped gartersnake		G4	S3S4	SSC

Human Discharge and Other Threats to the Dunes and the associated Beach Ecosystem

Agriculture

Historically, agriculture has had a significant negative impact on the dune complex, especially its wetlands. Estuaries were reduced, wetlands drained, and river and creek beds altered for farming and flood control. The extensive wetlands behind the dunes from Pismo Beach to the Santa Maria River have all but disappeared.

Entrained in the outflow of the Santa Maria River numerous agricultural chemicals pollute nearshore waters. This is a well known and documented toxic problem. This pollution finds its way into the food chain in numerous ways, one of which is its movement northward once captured in the Davidson north bound current. Tidal and wave action bring these pollutants to the beach damaging the micro flora and fauna. Such pollution also arrives from Arroyo Grande and San Luis Creeks mixing in the complex eddies of San Luis Bay. A warning sign has been posted at Oso Flaco Lake not to eat the fish because of contamination by agriculture chemicals.

Farmers have long denied that their applications of agricultural pesticides, herbicides and other sprayed chemicals drift. However, during the recent conflicts between these farmers and the newly approved cannabis farmers, the chemically dependent famers admitted, as an argument to prevent cannabis farming adjacent to their fields, pesticides from their operations would drift onto the cannabis crops. Agricultural chemicals and chemical fertilizers also are carried by the wind in the dust during plowing. The accumulation of these chemicals over the years have had an unknown impact on all or many flora and fauna in the dunes.

Outfall Pollution

The San Luis Obispo South County water treatment plant discharges through its outfall off Arroyo Grande Creek directly into San Luis Bay nearshore. It pollutes the nearshore ocean waters with chemicals not captured. Some of these pollutants are detergents, house cleaning chemicals, medications and a variety of industrial chemicals. Such discharge also arrives through an outfall from Avila Beach. All are toxic to the ecosystems.

During heavy rains urban and agricultural pollutants are washed into the local rivers and creeks. These then are discharged into the ocean adding significant amounts of toxins to the nearshore ocean environment and beaches. During these events most surfers do not surf for a few days. Those who have ignored warnings have gotten sick with many symptoms.

The damage caused by the nation’s largest underground oil spill in the dunes remains under studied. When exactly the pollutants reached the tidal habitat north of the Santa Maria River Estuary remains unknown. What and how much continues to migrate into the habitat remains unknown. Impacts for parts per billion are being ignored despite the known consequences to micro organisms.

Vehicular Pollution

Vehicular caused pollution comes in the forms of solids, liquids and gases. The primary concern of wind-blown particulate matter caused by churning and grinding of sand particles is but one problem. While its impact on humans living down wind is well documented and by itself a sufficient reason to shut down all vehicle traffic on the beach and in the dunes, there appears to

be little or no study of such impacts on the listed threatened and endangered species already stressed by others forms of pollution noted above.

Several petroleum products of unknown quantities drip from vehicles onto the beach or in the dunes. All are toxins in the ecosystems. Other toxic pollutants enter the ecosystems through exhaust. Many of the vehicles, being off road or trucks, lack street car regulations.

Not studied also is the damage to the ecosystem caused by the corrosive action of the sand to vehicle tires. Tires are known to contain benzene, mercury, styrene-butadiene, polycyclic aromatic hydrocarbons, and arsenic, among several others as well as heavy metals and carcinogens. Given the permitted amount of traffic (over 2,2 millions of “trips” per year) on the beach and in the dunes, the combined pollutants must be considered not within a suburban street assessment but as that of a busy urban thoroughfare or avenue.

Lastly, given the causes of climate change, one being exhaust pollution from vehicles, is it not time to regulate and stop unnecessary recreational pollution?

Light and Sound Pollution

What are the behavior changes caused by light and noise pollution of dune and beach vehicles to populations of nocturnal species? Vehicle lights on the dunes are visible from miles away at night. Depending on wind direction during the busy holidays and the summer season, the roar from the dunes sound like that of a nearby busy freeway blanketing Oceano. Given such intensities of light and noice pollution these cannot but add additional stress of the listed threatened and endangered species in the dune complex.

Other Pollutants

Human made pollutants enter the dune lakes and wetlands through the Black Canyon watershed, the Nipomo-Sury watershed, and the Santa Maria drainage into Oso Flaco lakes and eventually moving into San Luis Bay. These are lawn and garden chemicals and fertilizers and the complex of vehicular chemicals reaching the bay and dunes also through the Santa Maria River and other creeks. During heavy rains large amounts of such chemicals move into the dune lakes and the bay. After large storms it is not save for surfing or other ocean water contact sports.

Climate Change

Given the dependency of the fragile ecosystem of the dune complex from the subtle ebbs and flows of weather conditions within the transition zone, climate change is now adding additional stress on top of the human caused pollutants damaging the ecosystems as the ebbs and flows become more extreme. The ocean’s acidity, temperature increase, and ocean level rise also are adding additional stress to ocean dependent species.

Observations During Vehicle-Free Beach and Dunes

During the few months of a vehicle-free beach in 2020, many individuals contributed to a general agreement of positive observations:

1) Quickness of the return to natural contours of the beach from tidal zones to foredunes no longer compacted by vehicles. The return to a more normal appearance enhanced the beach experiences of individuals, families a groups.

2) Wildlife in numbers and species expanded along the corridors of the beach while vehicle-free. Bird species such as the black headed heron were seen in numbers as high as a dozen. Ospreys were noted at the Arroyo Creek. Coyotes were seen during the day. Also seen was flock of terns on the sand at the entryway at Pier Avenue. And noteworthy many observed for the first time at low tide large numbers of small Pismo clams in the shallow intertidal zone. There were several groups of hundreds of clams south Pier Avenue.

3) The enjoyment increased for beach walkers. There were large numbers of beach runners and walkers free from the usual exhaust and noise pollution and the paranoia caused by vehicle traffic. Also, large numbers of groups enjoyed family gatherings in unprecedented numbers unassociated with holidays.

Reopening to Vehicular Traffic

Immediately upon the opening of the beach to vehicles, the natural contours and small forming mini dunes were flattened. The newly seen wildlife fled or numbers returned to rare sitings. The clams disappeared because during low tide vehicles drove over the beds. And the “pedestrians” who once were large in numbers enjoying the beach dwindled to the usual low numbers. With the opening of the beach to traffic, the new Pismo Reserve hiking trails became over populated.

Cultural Resources

The Chumash people have inhabited this portion of their homeland for millennia. A date of 20,000 years ago has been established from radio carbon dating on Los Baros Creek. The artifacts were on display at the Guadalupe Culture and Art Center which financed the dating. At that time the ocean was 14 miles further west in the bay. It is unreasonable to believe this is the earliest date of the Chumash in the area. Another date of an artifact of the same time period was dated through its geological setting at Point Conception in the late1970s. The oldest village datings along the coast are around 10,000 years old. At that time these were not coastal but inland sites. Depending on land slant the ocean was at its furthest distance was 7 miles to the west of today’s coastline in San Luis Bay.

For a long period of time there was a mirror image in form of an estuary behind the dunes in Oceano. It is now farmland. One the Nipomo Mesa edge are the remains of extensive Chumash village activity. The estuary, dunes and beach were part of their sacred way and a major source for food and other resources.

As far as specific comments regarding the neglect shown by State Parks regarding protection of Chumash sacred and other sites over the years and the current proposed expansion, I defer to the Northern Chumash Council comments added at the end of my comments.

Negative Economic Impacts to the Oceano Community

Oceano was designated a disadvantaged community and Opportunity Zone by Governor Brown in April 2018. For many the obvious cause is the negative impact of State Parks allowing off road activities on the beach and in the dunes that discourages normal beach recreational activities available elsewhere on county and state beaches. State Parks actively discourages pedestrian activities at Oceano's beach by limiting direct beach access parking at the end of Pier Avenue. Also, the limited street parking is restricted; street parking is illegal until 9 AM on Pier Avenue. Just one mile to the North, State Parks actively encourages pedestrian activities at Grover Beach off Grand Avenue by providing a vast number of parking spaces. This hinderance is contrary to the State Parks statement (underline mine), "California's state parks provide a wide array of recreational opportunities for everyone's benefit and enjoyment."

But limited parking is one of many negative impacts on the community of Oceano. Traffic on the beach discourages normal beach and recreational activity for families and groups. The traffic requires constant vigilance to such a degree the numbers seen north along the vehicle-free beach do not occur. This results in a narrow spectrum of beach front businesses. Current businesses cater mainly to the vehicle oriented small portion of the wider population.

At the moment of this writing four economic studies have discussed the monetary contributions and impacts of the off-road recreation to the county's income in the last 15 years. The first study, published in 2007, was "Economic Impact of Oceano Dunes SVRA Visitors," prepared by William W. Hendricks, Ph.D., et al.[3] On page 29 they conclude that the , ". . . direct annual impacts of approximately $70 million" is the economic contribution to the county. The main reason for coming to the dunes was, ". . . the natural resources setting of the Dunes, being with others such as friends and family, and getting away from daily routines." This study did not analyze negative economic, social or environmental impacts caused this recreational activity by the large numbers drawn to drive onto the beach and into the dunes.

This study, like the following study which is controversial, based its findings not on objective, unbiased data and methodology, but on an assumption that those surveyed provided accurate, non inflated expenditures. Those surveyed knew their responses would influence the operation of the Oceano Dunes SVRA. The larger the expenditures, the more "positive" the perception of their economic benefits. At least the above study attempted a narrow focus on individuals, families and groups directly accessing the Oceano Dunes SVRA area unlike the following study that surveyed beyond the boundaries of the Oceano Dunes SVRA.

The second study, by Oceano Dunes District-California State Parks, "Economic Impact Analysis Report 2016/17" prepared by SMG Consulting. It is another survey with the same built-in survey bias mentioned above. A second in-built bias was the considerably wider geographical boundaries of those surveyed. It included the entire Oceano Dunes District of California State Parks: campgrounds, the Monarch Butterfly Grove, Pismo Lakes, Grand Dunes, Pismo Nature Preserve, Oso Flaco Natural Area, and the new Oceano Dunes District Visitor Center. From page six of the report we read (my underline), "This project is designed to determine the economic impact of visitors to the Oceano Dunes District of State Parks on the local San Luis Obispo County." The report concludes the economic contribution was $243,580,919 dollars. This "economic contribution to the county's economy" is almost 350 per cent increase above the 2007 published survey. This 70 million dollar contribution to the local economy remains suspect.

Again, like the 2007 report, no negative economic, social or environmental impacts were reported.

A major impact of this particular study, unlike the 2007 study, was the creation of a false narrative of a large economic contribution to SLO County's economic well-being by the SVRA activities. It was immediately and widely accepted by constituent groups supporting the SVRA activities as a fact that the off road activities were the cause of this high number. Naturally, the off road vehicle groups near and far quickly promoted this figure to justify their activities as a large positive contribution to the local economy. Intentional or not, by expanding the area of economic contribution this total figure became the rallying point for keeping the SVRA open and even a justification for expanding it. The political clot of the off road lobby was increased using this false narrative. Lacking a deep critical counter study, local chambers of commerce and elected officials also accepted the results.

The Grand Jury of San Luis Obispo County during its 2019 session studied the 2019 social and economic costs of the SVRA:

> 1) County jail costs $390,000 for 306 criminal arrests of that resulted in jail time. There was a total of 399 arrests.
>
> 2) 260 Cal Fire responses: $385,000.
>
> 3) 265 ambulance calls and 145 transports to local hospitals. Of these 14 were 'life or death' Code 3 transports; most of which went to Sierra Vista Trauma Center. The Combined Arroyo Grande Hospital, French Hospital and Marian Hospital admittance total for ATV accidents was 219. There were six reported accidental deaths.
>
> 4) Costs to the county for public defenders and processing through the D. A.'s office are not tracked and thus unavailable.

The grand jury did not examine the medical costs experienced by the communities of the Nipomo Mesa experiencing harmful and even deadly particulate drift caused by the SVRA activities. The churning of the sand by the dune off road activities into smaller wind-carried dust particles is well known. With the destruction of the foredunes by the off roaders, the wind-carried amounts of these particles have greatly increased causing severe lung damage and deaths to humans. Unknown are veterinarian fees for pets. Also unknown are damages to wild flora and fauna. While such damage and loss cannot be monetized, at least this must be considered as significant negative impacts into the tens of millions of dollars, if not more.

The fourth study, ECONOMIC IMPACT FROM SUSPENSION OF THE VEHICULAR USE AT THE OCEANO DUNES SVRA by Pratish Anilkumar Patel, is recent and at this writing just entering public discussion after stories in local news.[4] The reasons for this study were twofold: a criticism of the methodology of State Parks' 2016/7 survey and an interest in the economic impact of the closure of the beach and dunes to vehicles because of the pandemic. After criticizing the methodology of the 2018 published survey to measure economic impact, Patel uses established analytical economic impact toots to measure as closely as possible the actual economic impact of the closure to the beach and dunes traffic. His final conclusion stated, "Using a well understood and popular DiD approach, I find that vehicle suspension had no material impact on the County's economy."

Additionally, he shows little interest exists among visitors to Pismo Beach and Avila in the SVRA. This is another indication that only a small slice of beach oriented tourists are off road dune enthusiasts. Green tourism can easily fill in the economic loss of these off roaders while at the same time end the destructive economic, social, and environmental impacts caused by driving on the beach and in the dunes.

The Covid-19 pandemic has shown that when the beach and dunes were closed to vehicle traffic, the South County economy did not change. Elected officials and chamber of commerce witnessed this lack of change and appear at this moment studying green tourism opportunities as a more robust and positive economic prospect with less economic, social and economic harm to Oceano and the surrounding communities and the environment. The above recent study, though new, has added to this conversation.

The local history of impeded economic development caused by the off road activities is available through studying the respective time periods of Pismo Beach and Grover Beach when open and later closed to off road beach activities. Economic development of both cities increased upon closing their beaches to off road vehicle activities.

THE NORTHERN CHUMASH TRIBAL COUNCIL COMMENTS

Summary

February 15, 2021

Any vehicle identified in CVC section 38010 and 38012 as an OHV must be halted and eliminated from being on the Sacred Chumash Dunes complex in Oceano California. We all must look to the future generations, working diligently together to preserve and protect Mother Earth, so our children and grandchildren can play in the pristine wonders of the Dunes, and they can honor our decisions to protect and love the great Oceano Sand Dunes and not letting the Dunes be destroyed by OHV vehicles.

The State Parks PWP planning draft document lacks California Native American perspectives, indigenous spiritual understandings, indigenous religious comprehensions, and respect for the human beings that have lived on the Dunes for all time, a Chumash cathedral of life. The PWP draft document lacks respect for Chumash Heritage and Culture.

The Northern Chumash Tribal Council (NCTC) has spoken to the preservation of the Dunes for over 50 years, asking and pleading for actions that stop the destruction of the Chumash Culture, and Sacred Sites. In our opinion little to nothing has been done to protect Sacred Chumash Sites, what we have is minimal fencing around visible Chumash Sites, fences that out-of-towners drive over thinking it funny to destroy Chumash Sacred Sites, trucks with “Proud Boys” flags driving over our Sacred Sites with no care for the importance of Chumash Culture.

Who cares about the Chumash Culture and Sacred Sites? When you read this PWP draft document it concludes that there will be no significant impact to the Chumash Culture. NCTC finds this to be completely lacking in the truth and environmental justice. The PWP planning document will take you on a “Cookie Cutter” explanation of what drives their evaluations and twisted data and misleading archaeological institutional dominate non-indigenous understandings. In the end, compiling the “Cookie Cutter” institutional explanations for the white wash determination of no impacts.

This document, a boiler plate determination of archaeologist and institutional dogma, should open everyone's eyes to the white washing of the Chumash Culture. Why don't we all wake up, see that the Chumash lived for over 10,000 years on the sacred Dunes sands, lived, raised children, buried the elders, looked to the heavens of majesty, opened our souls to the Sun rises and Sun sets. As stewards of the care of the diamond that is the great Dunes and landscape of wonder, all points connected, walking, collecting, hunting, fishing, and living in the Oneness of All Things.

The Chumash today hold no rights of any kind through the dominate society to practice and experience our past, with honor for our ancestors on the Dunes. The Dunes must be honored for all, environmental justice for all.

Conclusion

Thrivability. Inclusivity. Equitability. Diversity. Accessibility. Sustainability. Collaboration. Innovation.

These are words heard clearly from our Commissioners, the Governor, State leaders, Native Nations, stakeholders, lessees, grantees, Commission staff, and the people of California, in every region and community, statewide. These empowering words echo as constant reminders of what the Commission has the responsibility to do, what it has the opportunity to change, and the role it has as a governmental leader and visionary change maker in the State of California.

State Parks has become addicted to the OHV revenues, State Parks is putting aside local residents opposition to OHV, State Parks has minimized California Native American Indigenous Peoples concerns about the long term damages already caused by OHV use, and our concerns for preserving our Sacred Lands for future generations. State Parks addiction to the OHV revenues has blinded their judgement and vision for the future. The OHV use must stop. State Parks addiction to the OHV revenues must be terminated, only then will the Dunes Thrive once again.

NCTC FEIR Comments:

8.1 Regulatory Setting

In the first and second sentence, the word "cultural" is used in a way that diminishes the importance, therefore what should be used is "Tribal Cultural Resources ".

8.1.1 California Environmental Quality Act (CEQA)

Second sentence CEQA recognizes "Tribal Cultural Resources"; for far too long archaeologist have tried to take over our stories, the Indigenous Peoples stories. We do not need archaeologist to tell our story, we are not archaeological resources.

8.1.3.1 Unique Archaeological Resources

Once again California Indigenous Peoples are not "archaeological resources"; such a lack of "social and environmental injustices".

Paragraph 5. Indigenous Cultural Resources do not have to be preserved in place, the word "disturbed" is often used to describe a Indigenous Sacred Place and then often considered

“insignificant”, which leads to the direct impact on the Sacred area or complete destruction, because an archaeologist could not collect data because of its designation. There goes another part of our Indigenous Heritage and Culture.

8.1.3.2 Assembly Bill 52 – Tribal Cultural Resources

“Assembly Bill 52 (Gatto, 2014). Section 1 of the bill states the legislature’s intent as follows: “In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and respecting the interests and roles of project proponents, it is the intent of the Legislature, in enacting this act, to accomplish all of the following: (1) Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities. (2) Establish a new category of resources in the California Environmental Quality Act called “tribal cultural resources” that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation. (3) Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible. (4) Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated. Because the California Environmental Quality Act calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources. (5) In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible point in the California Environmental Quality Act environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision making body of the lead agency. (6) Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to the California Environmental Quality Act (Division 13 (commencing with § 21000) of the Public Resources Code).”

“The Public Resources Code now states that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” Pub. Res. Code § 21084.2.”

“To determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. Pub. Res. Code § 21080.3.1.”

State Parks has not consulted one on one with NCTC on this current FEIR, having informational meetings is not tribal consultation, this is a very important project that will impact California Native American Chumash Cultural Resources.

8.1.6 State Parks Native American Consultation Policy and Implementation
Sentence 2. Prior to implementing projects or policies that may result in the impacts on Native American sites within the State Parks System, State Parks will actively consult with local Native California Indian groups…" this has not occurred, NCTC has had no current meaningful consultations with State Parks regarding this FEIR PWP.

8.1.9 State Parks Project Evaluation Process and BMPs for Cultural Resources
First Paragraph, Third sentence, "both a State Archaeologist and State Historian to review all projects" this statement states to Indigenous Peoples that archaeologist and historians understand our history better than Indigenous Peoples do, and in most cases their institutional backgrounds nourishes their dominant perspectives, NCTC would like to see a Tribal Liaison involved in all projects, almost all agencies in California today have Tribal Liaisons mandated by the State to assist in Indigenous perspectives understandings and communications, not institutional based book understandings only.

8.1.9. Second Paragraph, second sentence. Although State Parks thinks that they and their staff understand the Indigenous Perspectives through their educational back grounds and experience, this is not true. Indigenous Perspectives are unique to the First Peoples and therefore must be included in the brainstorming and planning of all projects that have the potential to disturb/ impact California Indigenous Peoples resources.

8.1.9 Third Paragraph. "Project components have been designed, and will continue to be designed, to avoid and minimize impacts to known significant archaeological resources and tribal cultural resources, if identified." The PWP design footprint is in one big California Indigenous Sacred Chumash Site, how you can pick the sites that are visible to avoid or minimize disturbance, when the whole area, the whole project footprint is a Chumash Sacred Site and Sacred Landscape.

Sentence 7 "In mobile dune environments, it is common to locate newly revealed archaeological resources in shifting sands" There are hundreds of hidden sacred middens that are the maker for our encampments, and lodges, the whole PWP project footprint is one big Chumash Sacred Site. State Parks claims that they know of 80 registered Chumash Sacred Site with half the park surveyed, we the Chumash of this Land say there are hundreds, and the whole area is a Sacred Living Landscape.

Sentence 8 "(Condition-2) Archaeological and Native American Monitoring" Monitoring is not mitigation under CEQA.

8.1.9.1 C-I: AVOIDANCE Sentence 2 "If documented archaeological resources", our Tribal Cultural Resources are not archaeological resources, there may be things that are archaeological resources, but anything connected to pre-historic Tribal Culture are "Tribal Cultural Resources".

The meaning of *avoidance* for NCTC is the absence of any and all human intrusions that may have possible impacts to the Tribal Cultural Resources, which would be identified by the Tribal Governments review.

8.1.9.2 C-2: ARCHAEOLOGICAL AND NATIVE AMERICAN MONITORING
Californian Native American Indigenous monitoring must be included in any and all project that have a Tribal Culture aspect, from Sacred Landscape to Villages, not just when someone classifies Sacred soils as disturbed, to all Indigenous Peoples disturbed and undisturbed are the same thing, containing the essences of our Ancestors lives. California Indigenous Peoples have equal standing with any and all anthropologist and archaeologist.

8.2 Environmental Setting
Second Paragraph. "There are at least 48 identified and recorded cultural resources within the PWP planning area." The entire PWP planning area is one Chumash Sacred Site and Living Landscape, and area where thousands of Chumash lived for over 10,000 years. State Parks is minimizing the importance of this Sacred Landscape by only emphasizing 48 cultural resource sites, the Chumash live throughout the entire Dunes habitat with ever changing landscape building Chumash life ways one on top of another. Geological sand dune movements over the last 10,000 years are phenomenal.

8.2.1.1 Archaeological Resources
California Indigenous Peoples Tribal Cultural Resources are not archaeological resources and should always be respected in the proper context. Archaeology has been trying to take our stories over for several hundred years, and Indigenous Peoples are not an archaeological resource.

78.2.2 Native American Consultation and Coordination
As can be seen from looking at the Table 8.1 Summary of PWP Consultation Efforts, the last effort that State Parks made to have meaningful consultation was May 15, 2018. As NCTC has stated previously in this document, no meaningful consultation has occurred, one or two meetings do not qualify as meaningful consultation, Indigenous comments and opinions must be included into the process.

Meetings with a tribe that include other tribes, agencies, or the public are not a substitute for mandatory consultation with that individual tribe. "Tribes are not interchangeable, and consultation with one tribe does [not] relieve State Parks of its obligation to consult with any other tribe that may be a consulting party under CEQA."

8.2.2.1 Tribal Cultural Resources
Sentence 1 "Consultation conducted in support of the PWP EIR has not resulted in the identification of tribal cultural resources within or immediately adjacent to the PWP planning area." NCTC finds this statement to be misleading at best, NCTC informed State Parks of the importance of the Chumash Sacred Landscape which encompasses the project area. Additional the Phillips 66 proposed developments area is one huge Chumash Site, NCTC personally worked on the recent survey conducted by Phillips 66 for the expansion for the oil railroad project. Over 75% of the Phillips 66 site is a Chumash registered Sacred Site, and State Parks is proposing to

destroy our Sacred Sites with OHV tracks and camp sites, not social or environmental justice in our understanding, nor has there been meaningful ongoing consultation.

8.3.3 Impacts and Mitigation
Sentence 1, "Implementation of the PWP is not expected to result in a substantial adverse change in the significance of an archaeological resources as defined in Section 15064.5." This statement is not true, misleading, and makes conclusions leaving out substantial additional Tribal Cultural Resources data and information currently available through a simple records search. Phillips 66 Tribal Cultural Resources data was not included in this report, vital information. Additionally, once again Indigenous Peoples are not archaeological resources.

8.3.3.1 Ongoing Park Operations and Regular Maintenance Activities
The ongoing park operation fall short of offering protections to Chumash Sacred Site.

8.3.3.3 & 4. Oso Flaco Improvement Project (Initial and Future)
NCTC does not support the the additional use of the area. It would degrade the Chumash Sacred Landscape.

8.3.3.5 Park Corporation Yard Improvement Project
Any and all proposed disturbance to native soils in or near Tribal Cultural Resources must include meaningful tribal consultation prior to finalization of work to be performed.

8.3.3.6 Oceano Campground Infrastructure Improvement Project
Native American monitoring is not mitigation under CEQA. Meaningful consultation must be included prior to any finalization of plans for proposed project in this area.

8.3.3.7 Pier and Grand Avenue Entrances & Lifeguard Towers Project
Meaningful consultation with Tribal Governments must occur.

8.3.3.9 Butterfly Grove Public Access Project
Meaningful consultation with Tribal Governments must occur prior to finalization of proposed plan.

8.3.3.10 Pismo State Beach Boardwalk Project
Native American monitoring is not mitigation under CEQA. Meaningful consultation with all affected Tribal Governments must occur prior to finalization of plans.

8.3.3.11 Phillips 66/Southern Entrance Project
Tribal Cultural Resources were mapped and registered during the tribal cultural resources surveys done about 3 years ago, during the Phillips 66 rail extension for the transportation of additional crude oil to the Phillips 66 plant. Many sites were defined and recorded. If State Parks had been having ongoing meaningful consultations with NCTC they would have known this, Applied EarthWorks performed the on the ground survey. Phillips 66 site and proposed OHV road to the dunes is covered with sensitive species and many Chumash registered Sacred Sites.

Impact 8-2

The potential for human remains in our Indigenous Perspectives is extremely high, looking at the large area of Chumash Sacred Landscape, therefore it is NCTC position that the cumulative impact for human remains is very high, and must be a class 1 impact.

Impact 8-3
Consultation with Tribal Governments back in May of 2018 is not meaningful or ongoing consultation. In NCTC comments in the May of 2018, NCTC did strongly identify Tribal Cultural Resources as Chumash Sacred Landscapes, therefore the cumulative effect on these Sacred sites requires extensive tribal meaningful consultation, and must be mitigated.

8.4 Cumulative Effects
Californian Native American Chumash Peoples lands stretch from Malibu to Ragged Point, inland to the Carrizo Plains. Today we the Chumash People have been able to protect less than 1% of our 100% stewardship of these lands, every small piece of impacts to our Scared Sites from project like the PWP is a major loss, when you add up all the proposed impacts from our Indigenous Peoples perspectives we see great cumulative effects. Any loss is the loss of a priceless resource, not renewable. NCTC finds State Parks determination of “not expected to result in significant cumulative effects” to be false and misleading from our Indigenous Perspectives.

Thank you for the opportunity to comment on this FEIR for the Oceano Dunes proposed PWP projects.

Northern Chumash Tribal Council

[1] The area's complex topography is the result of the meeting place of three major tectonic plates. The Farallon Plate, moving eastward, was subducting beneath the North American Plate. As the Pacific Plate moved northwest, the subduction eventually ceased in our area. Remnants of the Farallon Plate, microplates, were captured by the Pacific Plate beneath the North American Plate; continental margins of the North American Plate became part of the Pacific Plate. That is, all land and sea floor west of the San Andreas Fault that was part of the North American Plate, became part of the Pacific Plate. The microplates ride the Pacific plate (see for details: californiahttps://pubs.geoscienceworld.org/geosphere/article-lookup/1/3/147
As the Pacific Plate continued its northwest migration subducting under Alaska, it rotated the Arguello Microplate, also known as the Transverse block, forming the Southern California Bite. It is bordered on its eastern side by the Transverse Range, on the West side by the Channel Islands with the Ventura-Santa Barbara Basin in the middle, and to its north, the Arguello Canyon. The rotation ended with the capture of Baja that now presses against this block causing folding and uplift.

The Monterey Microplate from the Farallon Plate, beneath western Santa Barbara County and San Luis Obispo County, is bordered on the East by the San Andreas Fault, on the West by the Santa Lucia Bank and the Santa Lucia Escarpment and on the South boundary by the Arguello Microplate. This boundary's exact location is within the Arguello Canyon, a significant conduit directing the West Coast's only persistent upwelling that provide nutrients for the nearshore and micro beach flora and fauna. The Monterey Microplate is deformed with a subsistence slant from the coastline to the Santa Lucia Bank. The Santa Lucia Bank is tilted with the uptrust on its eastern most side. Running nearshore is the Hosgri Fault, another huge crack in this microplate.

[2] The persistent nutrient-rich upwelling flows up the Arguello Canyon, enriching the Santa Lucia Bank, the Arguello Canyon and coastal waters from Point Sal to Point Conception. Here, in a transition zone blending upwelling nutrients with warm water from the South and cold water from the North, a unique, complex interaction of species and natural phenomena occurs. Feeding the web of life along the eastern rim of the Pacific Basin, the nutrients spread through and beyond both the dune tidal area, feeding plankontic communities, plants of the kelp forests, and various life stages of marine flora and fauna.

The northern portion of the transition zone between Southern California warm waters and Northern California cold waters is defined as beginning at Point Conception and extending 2 degrees north to 36 degree north latitude (20 miles south of Point Sur at Mill Creek Canyon). The proposed sanctuary expansions cover this area north to Santa Rosa Creek. The area is the meeting place of the Oregonian Temperate Eastern Pacific and the Californian Subtropical American Eastern Pacific climates and waters. The region is dependent upon as well as a cause of the complex interaction of the southward moving California current, the warmer northward moving subcurrent, the near-shore northward moving seasonal Davidson Current, and the upwelling. The dynamics are not fully understood, and systematic, ecosystem-based research is needed.

The Oregonian weather pattern brings strong northwesterly winds during the spring, a cool marine layer with much fog during the summer, and generally strong wet storms during the winter. The warm, clear autumn months are generally dominated by the California Subtropical climate, which also tempers colder winter weather from the North.

The California Current system flows from the North Pacific and is driven by planetary rotation and large scale winds. Offshore circulation is dominated by this current for most of the annual cycle. The current flows along the surface and near surface at the edge of the continental shelf. It is generally composed of low-temperature, low-saline, subarctic waters. The current's position and intensity varies with season and latitude; several coastal currents oppose it.

At the inner edge of this system is the California Undercurrent, characterized by warm saline water. The undercurrent ranges to within 100 kilometers of the coast; it runs from Baja California to Washington State. The undercurrent surfaces in the winter along the coast of Central California.

[3] https://www.google.com/search?client=firefox-b-1-d&q=Report+Prepared+for+California+Department+of+Parks+and+Recreation+William+W.+Hendricks%2C+Ph.D.

[4] *Economic Impact from Suspension of the Vehicular Use at the Oceano Dunes SVRA*

No to expansion of expanded off-road camping, Yes to environmental priority

Ellen Beraud <ellenberaud@gmail.com>

Tue 2/16/2021 12:23 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; OceanoDunes.PWP.EIR@parks.ca.gov <OceanoDunes.PWP.EIR@parks.ca.gov>
Cc: peopleforthedunes@gmail.com <peopleforthedunes@gmail.com>

Dear Coastal Commissioners and State Parks representatives,

As a 20+year resident of the county and former Mayor/Council Member for the City of Atascadero, I am very concerned about the direction that State Parks want to take, to expand off-road access and increase impacts to the sensitive, unique ecosystem know as the Oceano Dunes.

For my family and many, many other residents we value:
•Access to a safe beach for pedestrians, equestrians
•NO development of Oso Flaco Lake area, this is an important nature preserve
•Better Air Quality for the Nipomo area by reducing the area allowed for off-road
•Stop the needless Accidents and Deaths, trash and noise
•Stop the degradation of the Dunes, do real restoration planting and fence off from off-roading

Please follow the Science and phase out off-roading as an allowable use. Don't buy the false claims of a negative economic impact without off-roading. The latest, more objective study- reports the opposite effect during the closure this past year.

Thank you for your time and attention to this very important issue for our county.
Sincerely,
Ellen Beraud

9608 Laurel Road
Atascadero, CA 93422
(805)462-3020

Do The Right Thing Here: Protect Oceano Dunes!

sharon hite <skhite1@hotmail.com>

Mon 2/15/2021 10:25 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please follow the Coastal Act and entirely reject State Park's latest joke of a "PWP". You all are not alone in truly wondering if they listen to your direction at all. Proposing Oso Flaco (AGAIN !) be converted to high-use OHV expansion is the height of hubris! This PWP is a slap in the face to the Coastal Commission's mission as well as a showing a shocking disregard for any actual Stewardship of this special environmental area. How long can this continue to go on? State Parks as shown, ad nauseum, that they are not operating in good faith regarding protecting this sensitive natural resource.
I believe transitioning from OHV to beach camping is the balance we need here: access to overnight camping to enjoy this area while eliminating damaging the dune ecology and reducing unsafe air particulates.
Sincerely,
Sharon HIte
Oceano, CA

Fwd: Environmental Justice at Pier AVE OCEANO

Charles Varni <charles@varni.org>

Mon 2/15/2021 9:18 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

---------- Forwarded message ---------
From: **charles varni** <charles@varni.org>
Date: Mon, Feb 15, 2021 at 11:48 AM
Subject: Environmental Justice at Pier AVE OCEANO
To: <OceanoDunes.PWP.EIR@parks.ca.gov>

Dear State Parks,

Thank you for the opportunity to comment on the Pismo/Oceano Public Works Plan. I am a 20+ year resident of Oceano and an Avis outdoorsman, surfer, beach and dune hiker. I have very serious concerns and reservations regarding the PWK and EIR. While there are a few very positive aspects like upgrades to campgrounds and Butterfly grove, expanded boardwalks and beach access, a possible an small scale car camping (no RV's) area at Oso Flaco, the proposed expansion of OHV areas is unacceptable.

This PWP includes the following recommendations to address issues identified during the planning effort: • Permanently designate Grand and Pier avenues as primary access points to Oceano Dunes SVRA. The Plan 3-5

In the early 1980's this entrance was defined as temporary and, more than 40 years later, it is still in use with massive increases in traffic volume which impact our community in many negative ways. In addition, major and costly upgrades to the entrance points are also proposed.

3.3.10 A4. Pier and Grand Avenue Entrances and Lifeguard Towers Project This project will replace the entrance kiosks at Pier and Grand avenues that are outdated, in poor condition, and not ADA compliant. A new design will improve operational efficiencies and allow staff to assist park visitors better.

Our primary concerns revolve around the CEQA and CCC requirements in relation to environmental justice in the economically disadvantaged community of Oceano with approximately 50%+ of its residents defined was Latino. It is our position that State Parks is in violation of the spirit and letter of this regulation and it needs to be corrected now, not made permanent.

As quoted in the PWP Planning Process 2.0, the purpose of the Environmental Justice component of CEQA is the following (2.2 Environmental Justice):

The purpose of the policy is described as a way: "…to empower these communities [as defined in the Policy] that have been ***historically excluded from accessing the benefits of coastal development and resources*** *due to discriminatory implementation of local, state, and federal policies and lack of access to the process and decision-makers." (California Coastal Commission, 2019, p. 4).*

The clear facts are that Oceano has been "…historically excluded from accessing the benefits of coastal development and resources due to discriminatory implementation of local, state, and federal policies and lack of access to the process and decision-makers." This exclusion from benefits is all because of the fact that our beaches are filled with all forms of automobiles and trucks which means all forms of animals (including homo sapiens) are at physical and emotional risk when seeking to recreate on the beach.

For decades the temporary use of our main access route to our community's beach has been dominated by motor vehicles which is an inappropriate use of a public beach. And this temporary use has resulted in economic and recreational losses to our community.

Unlike other California beach communities, Oceano has never been able to achieve any significant benefits from coastal development because the great majority of Californians (and locals) do not want to recreate on a beach made dangerous and uninviting by thousands of motor vehicles. Pier Avenue is a shabby, rundown hodgepodge of ATV rentals and off-roader accessories and supplies stores with tracked out beach sand blowing in the street and air.

Pismo Beach only became a desired tourist destination after it banned vehicles from its beaches. We want the same opportunity to develop our local economy, create hundreds of new jobs, and have a beach where our families, children, grandparents and visitors can RELAX, rather that dodge vehicles and stress about their kids playing in the sand.

Section 2.2.2 Meaningful Engagement purports to enumerate all the ways State Parks has engaged our community over the years. We are not experiencing this. Only recently did communications or outreach be presented in Spanish and English. Surveys done by State Parks are notoriously biased with unrepresentative samples, leading questions, and unsubstantiated data on mythical revenues from the SVRA. New comparative econometric research from Cal Poly (unpublished) comparing Oceano to other coastal non-SVRA communities (e.g. Avila Beach) show there are no significant positive economic impacts from the SVRA. In fact, during the SVRA Covid-19 closure, County Transient Occupancy Taxes in Oceano were the highest in five years.

In conclusion, our community is tired of decades of being the “doormat of the dunes.” We are long overdue for our chance to enjoy and prosper from a beach without vehicles. We have suffered from State Park’s policies, procedures, and operations that continue to use our beach as the access to the SVRA—and continue to keep us off of the beach.

Sincerely,

Charles Varni
Oceano, CA

Save Oso Flaco

Sydney Horne <sydneyhorne467@gmail.com>

Mon 2/15/2021 9:05 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Hello my name is Sydney Horne. I have been a resident on the Arroyo Grande Mesa for about 6 years now. As a resident, I do not want this plan to move forward. This will increase traffic to my house and it's already bad during certain points of the day. I live in this area to avoid "normal city issues". Crime is another thing to consider if this plan moves forward. I feel very safe in my neighborhood and if this plan were to move forward I would not. I am even considering selling our house if this plan does move forward. So even though you are gaining more possible income from visitors, you will be losing local income. How much do we need to develop before we say enough is enough? Keep things the way they are. Going through with this plan will cause way more issues than benefit the people. Not only will the people of the mesa be disturbed, wild life will be disturbed as will the AG land located near to this propsed project. Trash will be another issue. You can argue there will be a dumping program but look at Pismo Beach and what happens to it during the weekends and holidays. I hope the people of this area will be vocal and active in fighting this proposed plan.

Thank you
Sydney Horne

Do not allow the beauty and special ecosystem of Oso Flaco Lake to be destroyed

Don Maruska <don@donmaruska.com>

Mon 2/15/2021 7:22 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

The proposal from State Parks would devastate the fragile habitat of Oso Flaco Lake and destroy the opportunities for people to enjoy the birds and other wild life of the area.

Please intervene to stop this travesty.

Thank you for you.

Don Maruska - entrepreneur, speaker, workshop leader, Master Certified Coach
895 Napa Avenue, Suite A-5, Morro Bay, CA 93442; 805-772-4667; fax: 805-772-6475
Author of "How Great Decisions Get Made" and "Take Charge of Your Talent"
ebook series "Grow and Enjoy Your Business" -- my gift to you at https://DonMaruska.com

No trees were harmed in the transmission of this email, but trillions of electrons were excited to participate.

Phillips 66 Property Agreement

Kara Woodruff <KWoodruff@blakeslee-blakeslee.com>

Mon 2/15/2021 5:42 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; Christie, Sarah@Coastal <Sarah.Christie@coastal.ca.gov>; OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

1 attachments (5 MB)

DPR-P-66 Agreement (4-1980).pdf;

Good morning, everyone.

Wanted to make sure you were aware of the attached agreement between State Parks and Union Oil (predecessor to Phillips/Conoco, etc.) concerning the “buffer land” upon which Parks is now proposing very significant OHV/recreational development.

Best wishes, Kara

Kara Woodruff

1740 Pismo Dunes RES 3317

AGREEMENT AND GRANT OF DEVELOPMENT RIGHTS

This Agreement, made and entered into this 8th day of April 1980, by and between UNION OIL COMPANY OF CALIFORNIA, a California Corporation, hereinafter called "COMPANY", and the STATE OF CALIFORNIA, acting by and through the DEPARTMENT OF GENERAL SERVICES with the approval of the DEPARTMENT OF PARKS AND RECREATION, hereinafter called "STATE";

WHEREAS, STATE PUBLIC WORKS BOARD proposes to purchase certain property from the UNION OIL COMPANY as an addition to Pismo Dunes State Vehicular Recreation Area as shown on attached Acquisition Plan identified as Drawing No. 15651 marked Exhibit "A";

WHEREAS, in addition to this purchased property COMPANY proposes to grant to STATE the right, estate, and interest to occupy and use and to prevent the further development during the term hereof of an adjacent parcel of land for specific Buffer Zone purposes in connection with the operation and maintenance of lands within Pismo Dunes State Vehicular Recreation Area;

WHEREAS, COMPANY shall retain ownership of other real property contiguous and adjacent to the Buffer Zone and conduct various industrial uses and operations on said other real property next to the Buffer Zone.

WHEREAS, it is in the interest of the parties hereto to enter into this Agreement for the purposes and on the conditions hereinafter referred to;

NOW, THEREFORE, the parties hereto hereby mutually agree as follows:

15651

1740

COMPANY hereby grants to the STATE the right, estate, and interest to occupy and use and to prevent the development during the term hereof, except as herein provided of that certain parcel of land (said parcel) as delineated in red on the attached Exhibit "A", which exhibit by this reference is made a part hereof such right, estate, and interest shall endure for a term of five (5) years beginning on May 1, 1980 and ending on April 30, 1985 and such term shall be automatically renewed at the end of such five year term, and at the end of any subsequent five year term, for an additional period of five years, unless notice of non-renewal is given in writing, by COMPANY to STATE. In the event of such notice the right, estate, and interest of STATE under this agreement shall terminate two (2) years after the end of the five year term within which such notice was served on STATE. Such right, estate, and interest is subject to the following terms and conditions:

1. STATE shall use, operate, and maintain said parcel only as a part of the State Park System for the purpose of providing a buffer zone, between other property of the STATE and other property owned by COMPANY adjacent to said parcel, and for uses and operations consistent with providing a buffer zone which shall include security patrol or emergency access, preservation of scenic values, natural interpretation through guided tours, preservation, maintenance, preventive maintenance, or rehabilitation of existing land conditions such as dunes, dune foliage, wetland, flora and fauna habitats, and such other uses as are consistent with the Buffer Zone concept described herein.

2. STATE shall not allow entry upon or occupancy of said parcel by the general public or by anyone for uses other than as described herein, or any use, except as provided for herein, which requires access to said parcel by anyone other than State Park System personnel, other relevant employees or agents, or contractors of the STATE without express written consent of COMPANY.

3. The STATE shall install and maintain boundary markers, and appropriate warning markers along the boundary between the State Park System and said parcel and prohibit access except as herein provided to the buffer area within said parcel. STATE shall maintain and place warning markers on COMPANY's existing fence and any fence subsequently installed within said parcel along said western edge of the railroad right of way. COMPANY and STATE shall have the right to use COMPANY's existing gate for access to said parcel at all times. Except as herein provided STATE shall not be required to expend funds for development within said parcel.

4. COMPANY may use and occupy that portion of said parcel indicated in blue and labelled "Company Use Area" on Exhibit A for uses necessary and beneficial to COMPANY's other real property in the area and operations thereof and not inconsistent with the Buffer Zone concept and the provisions of this Agreement; provided, however, that COMPANY may not further develop or expand operations on said parcel except to maintain, repair, replace, or reconstruct existing facilities or to construct such other new facilities as are approved in writing by the STATE as consistent with the Buffer Zone concept in the reasonable opinion of the STATE. COMPANY and STATE hereby agree that uses in the Company Use Area which are not inconsistent with the Buffer Zone concept include, but are not limited to the following:

-- storage of non-operating equipment and non-hazardous materials such as pipes, construction materials, pumps, product containers, and such protective shelters as may be required.

-- inspection, access, maintenance and security patrols; and

-- use of Company Use Area on a short-term basis as a staging or prefabrication area during construction of improvements or repairs to facilities on COMPANY's other real property in the area.

COMPANY and STATE agree that the following uses in the Company Use Area would be inconsistent with the Buffer Zone concept: employee or contractor parking, temporary office or trailer facilities, additional permanent structures, including climate controlled storage facilities, warehouses which require utility service or other operational equipment.

COMPANY shall maintain existing pipelines and other existing facilities and operations in said parcel and shall have reasonable rights of access, use, and maintenance of such pipelines and facilities.

Notwithstanding any description herein of non-permitted uses in the Company Use Area or Buffer Zone to the contrary, COMPANY shall retain the right to develop its subsurface rights in drill sites located at mutually agreeable sites within the Buffer Zone, to install, operate and maintain the equipment and facilities required to develop the subsurface resources and to have necessary access to pipelines and other required facilities in the Buffer Zone to support such drill sites.

5. STATE shall not be responsible for the protection, care, maintenance, or control of any property or equipment stored in or placed by or for COMPANY within said parcel, anything herein to the contrary notwithstanding.

6. COMPANY and its employees, agents and contractors, subject to the limitation on development, and disturbance of STATE improvements as herein provided, shall at all times retain the right to enter said parcel to observe, inspect, test, study, and otherwise monitor conditions on the entire parcel for purposes of determining STATE'S adherence to the terms of this Agreement, the condition of the parcel, possible effect of changing conditions of said parcel on COMPANY'S other real property and operations in the area, and such other purposes as are consistent with this Agreement. Except for the uses described herein as reserved to COMPANY, STATE'S occupancy of the parcel shall be exclusive, and COMPANY shall not assign or delegate or otherwise transfer its retained rights hereunder except as they may be transferred with said parcel or said other real property.

7. The right, estate, or interest of STATE under this Agreement shall be terminable on 30 days written notice to STATE by COMPANY in the event STATE after 90 days written notice specifying a breach of this Agreement does not cure or diligently carry out work to cure any breach of the restriction, covenants, or obligations upon STATE under this Agreement, or on written notice in the event any condemnation proceedings are initiated by the STATE, or on written notice in the event any other Agency with eminent domain powers establishes a more necessary public use than the STATE.

8. COMPANY does not warrant or represent the appropriateness of said parcel for the use as a buffer zone for Pismo Dunes State Vehicular Recreation Area and by execution of this Agreement does not establish, alter, waive or modify, or expand the responsibilities, liabilities or obligations of COMPANY with regard to conduct of activities on its adjoining real property which is being used for operation of an oil refinery, coke plant, and similar activities.

9. COMPANY and STATE agree to provide each other with current information, schedule and description of all personnel, equipment and material using or occupying during the term of this Agreement, said parcel two weeks prior to such occupation or use; and in circumstances requiring prompt action, as conditions permit, so that COMPANY and STATE may coordinate such use and prevent or minimize any inference, risk, or damage.

10. STATE hereby covenants and agrees, to extent it may legally do so and subject to availability of funds, to indemnify COMPANY against liability, losses, damages, or costs which COMPANY may suffer as a result of claims, demands, or judgments against it resulting from a negligent act or omission by STATE except such as arise out of the concurrent or sole negligence of COMPANY or by reason of the use of said parcel by COMPANY as herein provided.

11. It is understood and agreed that this Agreement and the right, estate, and interest herein given may be terminated by STATE by giving one hundred eighty (180) days written notice to COMPANY.

12. Any notice, demand, or request required or authorized by this Agreement to be given or made to or upon STATE shall be deemed properly given or made if delivered by certified mail, postage prepaid to: State of California, Department of Parks and Recreation, P.O. Box 2390, Sacramento, CA 95811.

The notice, demand, or request required or authorized by this Agreement to be made to or upon COMPANY shall be deemed properly given or made if delivered by certified mail postage prepaid to the Union Oil Company of California, P.O. Box 7600, Los Angeles, CA 90051, Attention: Vice President, Refining and Supply, 76/w (and a copy to Manager, Santa Maria Refinery, Union Oil Company of California, Route 1, Box 7600, Arroyo Grande, CA 93420).

The designation of the person to or upon whom any notice, demand, or request is to be given or made, or the address of any such person may be changed at any time by notice given in the same manner as provided in this article for other notices. Nothing herein shall preclude the giving of notice by personal service.

13. All obligations of STATE under this Agreement are subject to availability of funds appropriated therefor. Failure of STATE to meet its obligations hereunder because of non-availability of funds shall constitute a breach of this agreement for purposes of paragraph 7.

14. Anything herein to the contrary notwithstanding, COMPANY shall not damage or disturb any boundary marker, fence, warning marker, or any other STATE improvement to said parcel, permitted by this Agreement. After the end

of the term hereof or the sooner termination thereof, STATE may, at the STATE'S option, remove any boundary marker, fence, warning marker, or any other STATE improvement to said property. All such material and improvements shall be the property of the STATE.

15. If the COMPANY'S right to terminate the right, estate, and interest granted to STATE under this Agreement is exercised effective before the end of the twelfth year under this Agreement, COMPANY agrees to pay STATE one-half of the COMPANY necessarily incurred actual costs to install the fence, required to be installed by Property Acquisition Agreement dated April 8, 1980 between COMPANY and STATE, over and above the estimated salvage value, if any, of said fence.

16. STATE agrees not to unreasonably withhold approval of a license or permit issued to the property owner adjoining Black Lake to permit such owner to enter the portion of said parcel immediately adjacent to Black Lake to do erosion control work to control sand dune movement which is otherwise consistent with the terms and conditions of this Agreement.

17. Except as expressly provided herein there is no intent by COMPANY to dedicate said parcel to public use or waive any of its rights regarding said parcel.

STATE OF CALIFORNIA
DEPARTMENT OF GENERAL SERVICES

BY: Edward R. Mills
Chief Land Agent DATE

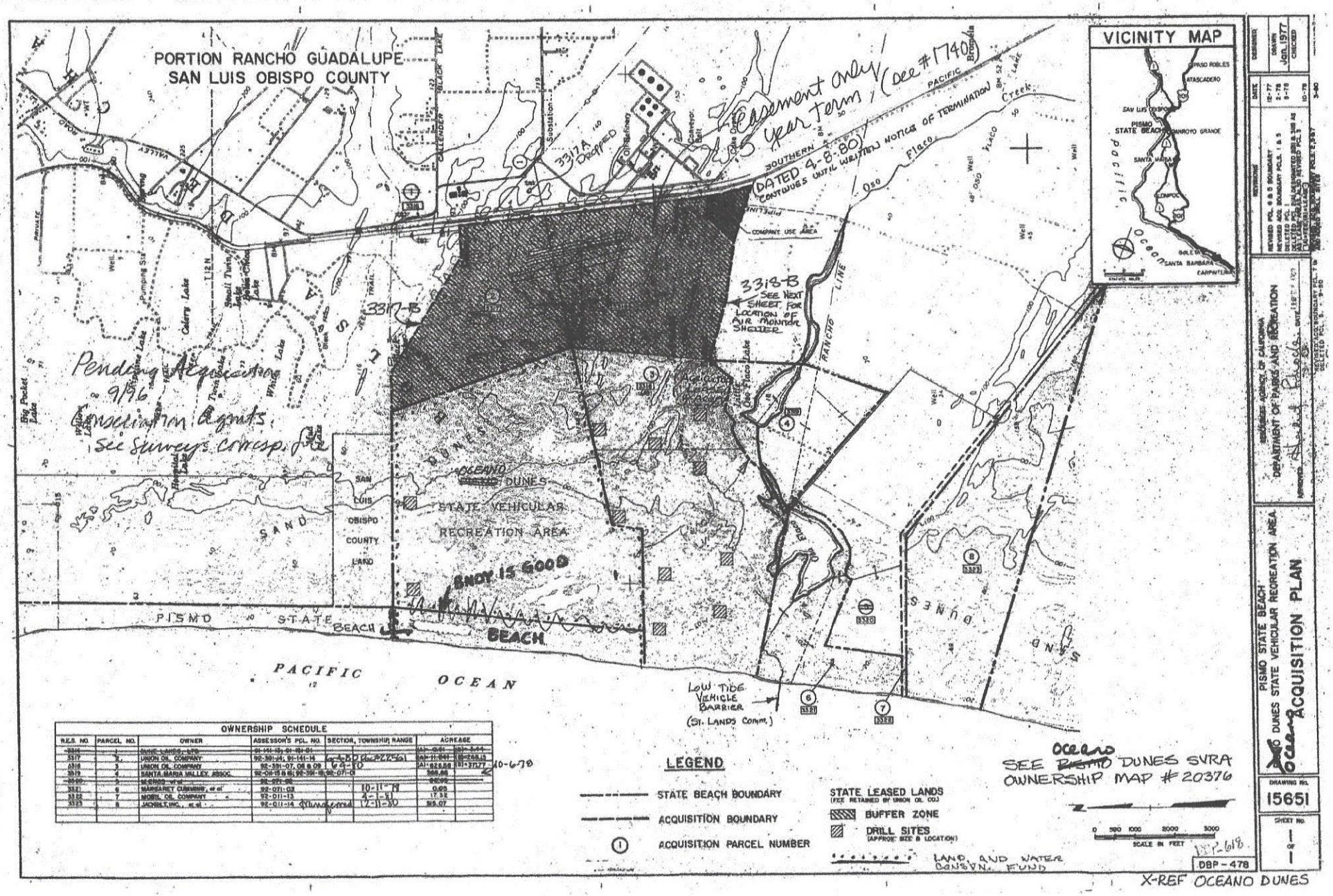
DEPARTMENT OF PARKS AND RECREATION

BY: Jack Hannon APR 28 1980
Director DATE
N-8953C Deputy Director

UNION OIL COMPANY OF CALIFORNIA

BY [signature]
VICE PRESIDENT

Date April 8, 1980



OWNERSHIP SCHEDULE

R.E.S. NO.	PARCEL NO.	OWNER	ASSESSOR'S PCL. NO.	SECTION, TOWNSHIP RANGE	ACREAGE
3316	1	SAME LANDS, ETC.	91-141-13, 91-151-01		(A) 0.61 (B) 3.44
3317	2	UNION OIL COMPANY	92-391-14, 91-141-14	Lot 30 of 27.56	(A) 71.641 (B) 268.15
3318	3	UNION OIL COMPANY	92-391-07, 08 & 09	6-45-10	(A) 212.58 (B) 377.27
3319	4	SANTA MARIA VALLEY ASSOC.	92-09-15 & 16; 92-391-15; 92-071-01		366.88
3320	5	M. KINGS, et al	92-071-06		20.00
3321	6	MARGARET CUMMINS, et al	92-071-03	10-11-M	0.05
3322	7	MOBIL OIL COMPANY	92-011-13	4-1-11	17.32
3323	8	JACKSON, INC., et al	92-011-14 (Surveyed)	12-11-30	115.07

10-678

12-678

STATE OF CALIFORNIA – THE RESOURCES AGENCY
[redacted]PARTMENT OF PARKS AND RECREAT[redacted]

TRANSFER OF JURISDICTION CONTROL SHEET

To: Real Estate Services
650 Howe Avenue
Sacramento, CA 95825

Date: 8/27/81

Attention: Jerry Heminger

From: Department of Parks and Recreation Acquisition Division, Property Acquisition and Ownership Records, Roland P. Foos, (916) 322-7507

PART I TO BE COMPLETED BY AREA/REGION AND FORWARDED TO ACQUISITION DIVISION

PARK OR PROJECT 240264 Pismo Dunes SBRA DBP 478

PARCELS 3318A (626.58 acres) Union Oil Company #788,425

PUBLIC WORKS BOARD SETTLEMENT DATE 4-28-80 ACQUISITION PLAN NUMBER 15651

INVESTIGATION RECOMMENDATION

☒ Transfer on Acquisition Area acquired in fee, 1010 - 383.42 = 626.58

Disposition of Improvements/Cleanup

☐ Interim Management

Instructions to R.E.S.

☐ Lease back (G.S. to Control)

Special Conditions 3318B (371.77 acres leased by Parks concessions)

RECOMMENDATION OF AREA MANAGER COMMENTS		RECOMMENDATION OF REGIONAL DIRECTOR COMMENTS	
SIGNATURE OF AREA MANAGER	DATE	APPROVED FOR REGIONAL DIRECTOR ▶	DATE

PART 2 TO BE COMPLETED BY HEADQUARTERS ACQUISITION DIVISION AND FORWARDED TO REAL ESTATE SERVICES

RECOMMENDATIONS APPROVED BY ACQUISITION DIVISION. PLEASE PROCEED AS DIRECTED
COMMENTS

Per telephone conversation 8/2//81 with Wes Cater, Area Manager and John Baggett, Central Coast Region request early transfer of parcel

APPROVED	TITLE	DATE
Roland P. Foos	Land Agent	8/27/81

OPR 163 (Rev. 11/80)

SEP 02 1981

STATE OF CALIFORNIA – THE RESOURCES AGENCY
DEPARTMENT OF PARKS AND RECREATION

TRANSFER OF JURISDICTION CONTROL SHEET

To:
Richard E. Felty
Central Coast Region (2)

Date: 3-9-81

From: Department of Parks and Recreation Acq. Div. Property Acquisition and Ownership Records
Roland P. Foos, 916, 322-7507

PART I TO BE COMPLETED BY AREA/REGION AND FORWARDED TO ACQUISITION DIVISION

PARK OR PROJECT Pismo Dunes SVRA DBP 478

PARCELS 3319 (366.86 acres) Santa Maria Valley Assn.

PUBLIC WORKS BOARD SETTLEMENT DATE 8-29-78 ACQUISITION PLAN NUMBER 15651

INVESTIGATION RECOMMENDATION

☑ Transfer on Acquisition

Disposition of Improvements/Cleanup

☐ Interim Management

Instructions to R.E.S.

☑ Lease back (G.S. to Control)

Special Conditions partial lease back required for area being farmed.

RECOMMENDATION OF AREA MANAGER COMMENTS	RECOMMENDATION OF REGIONAL DIRECTOR COMMENTS
portion of this property is leased private firm by Gen Services for [illegible]ming.	Transfer Portion Not Being farmed. G.S. hold portion being leased.
SIGNATURE OF AREA MANAGER [illegible] E. Cate — DATE 3-16-81	APPROVED FOR REGIONAL DIRECTOR ▶ W Trinde for REF — DATE 3/20/81

PART 2 TO BE COMPLETED BY HEADQUARTERS ACQUISITION DIVISION AND FORWARDED TO REAL ESTATE SERVICES

RECOMMENDATIONS APPROVED BY ACQUISITION DIVISION. PLEASE PROCEED AS DIRECTED

COMMENTS

APPROVED Roland P. Foos TITLE Land Agent DATE 3-27-81

OPR 163 (Rev. 11 80)

Reminder 8-27-81

DEPARTMENT OF PARKS AND RECREATION

TRANSFER OF JURISDICTION CONTROL SHEET

To:
Richard E. Felty
Regional Director
Central Coast Region
2211 Garden Rd.
Monterey, CA 93940

Date: 1-16-81

From: Department of Parks and Recreation Acq. Div. Roland Foos ((916) 322-7507)

PART I TO BE COMPLETED BY AREA/REGION AND FORWARDED TO ACQUISITION DIVISION

PARK OR PROJECT Pismo Dunes SVRA DBP 478

PARCELS 3322 - Mobil Oil Co.

PUBLIC WORKS BOARD SETTLEMENT DATE 11-25-80 ACQUISITION PLAN NUMBER 15651

INVESTIGATION RECOMMENDATION

☒ Transfer on Acquisition

Disposition of Improvements/Cleanup

☐ Interim Management

Instructions to R.E.S.

☐ Lease back (G.S. to Control)

Special Conditions

RECOMMENDATION OF AREA MANAGER COMMENTS	RECOMMENDATION OF REGIONAL DIRECTOR COMMENTS
Accept	Accept
SIGNATURE OF AREA MANAGER	DATE 1-22-81
APPROVED FOR REGIONAL DIRECTOR	DATE 2/2/81

PART 2 TO BE COMPLETED BY HEADQUARTERS ACQUISITION DIVISION AND FORWARDED TO REAL ESTATE SERVICES

RECOMMENDATIONS APPROVED BY ACQUISITION DIVISION. PLEASE PROCEED AS DIRECTED

COMMENTS

APPROVED Roland R. Foos / Land Agent (TITLE) DATE 2-17-81

DPR 123 (Rev. 11/80)

(No subject)

Ms Whitefeather <wellnesstherapies4u@gmail.com>

Mon 2/15/2021 3:03 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

it is my understanding that with the large truck and continual driving on the beach and now with out the traffic the clams were starting to come back
to the area...now that they are back on the beach it is killing the clams that were staring to return...this is such a sad thing to think we will never get our clams back if they vehicles start again ...this would be an endangerment to the local clam community...it would be nice to have them flourish on
the beach again...bringing the beach back to its original growth of the clams.

--
Whitefeather

I support the C.C.'s Vision for Oceano Dunes

michael brajkovich <mikebrajkovich@gmail.com>

Mon 2/15/2021 7:10 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

To The California Coastal Commission,

As a nearby resident of the Oceano dunes, I'm writing in support of the California Coastal Commission's vision for the Oceano dunes (as described on your website, February 14, 2021).

Thank you for your creative and very reasonable ideas regarding the dunes in particular as well our central coast area in general. Your preservation of the natural beauty in our area is important for us who live there and will be appreciated for generations to come. This is the right and long-lasting thing to do.

And of course, thank you for your patience and your prudence, particularly in dealing with the irresponsible motions by the current management of our State Parks OHV division. I hope for an improved management, one with a broader, better vision for the land and its people.

Sincerely,
Michael Brajkovich
Arroyo Grande, California

March 18, 2021 Coastal Commission Meeting - Future of Oceano Dunes

Paul Cable <pcable19@gmail.com>

Sun 2/14/2021 7:26 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

We highly support the Coastal Commission staff recommendations for the Ocean Dunes. We live in the Trilogy area of Nipomo, a few miles east of the Oceano Dunes, and have done so for the past seven years. During that time we have experienced dust, poor air quality, and health hazards caused by the excessive off-road activity at the Oceano Dunes. In our opinion, there is absolutely no reasonable justification, other than a pure profit motive, for allowing continued off-road use of the Oceano Dunes. In contrast, allowing off-roading activity damages the local environment, pollutes the air, keeps a greater number of people from enjoying the dunes and beach area, and limits economic activity for Oceano, Grover Beach, and Pismo Beach.

Again, we are STRONGLY IN FAVOR of the Coastal Commission Staff Recommendation for the Oceano Dunes.

Respectfully yours;
Paul & Debra Cable

Please help Protect/ Preserve Oso Flaco Lake

Glenn & Diedra Fuss <budjones4@gmail.com>

Sun 2/14/2021 6:45 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I have lived in San Luis Obid[o County for 40 years.Oso Flaco is 1 of the few places that young children, disabled (wheelchairs) seniors and those not in tip-top hiking shape, (parents with strollers) can go to see a lovely natural lake with a boardwalk with birds of all kinds (fresh water white pelicans, all kinds of ducks, cormorants etc.) 1 early December morning we even saw a mother raccoon and her 3 small raccoon babies. It's been such a peaceful, quiet, natural refuge. That will disappear . It's not just the snowy plovers on the beach.

NOISE/ TRASH/POLLUTION/ DESTRUCTION OF NATURAL HABITAT/ EXCESSIVE ER injuries/ deaths/ DUIs, extrac cost to County for emergency servives
Unfortunately, ORVehicles, Camping, bring noise, trash, speed, Trash, drinking, accidents which require ambulances etc. Every 3 day holiday we can hear the ambulances
speeding towards the beach. Local dare not go to the beach on any holiday much less a Sat/ Sun unless before 9AM from Memorial Day til Labor Day and then some.
I worked within 2 miles of the near the Grand Ave entrance to the beach for 27 years and some days we couldn't park to go to work because of all the "visitors" with their huge vehicles and trash, and noise. I live on the way to near Paulding middle school and can even hear the ambulances in the summertime.

NO FINANCIAL NEED FOR MORE ORV services
What about the recent Cal Poly professor's study who found there is little to no extra financial incentive to let vehicles run amok on the beach, killing and severely injuring pedestrians, even EMTs have been injured and killed. Wonder what the % of DUIs at the beach have been.

ONLY BEACH WITH VEHICLES ON PACIFIC COAST
Why do we have to be the only beach on the Western seaboard to allow cars to drive ?

WILDLIFE WILL DISAPPEAR
If your proposed Oso Flaco expansion goes thru, the birds and wildlife will disappear, as will the normal locals who just want an hour or two of nature and quiet, as well
a folks who want to walk quietly and take their trash back with them.

Charge more. Lopez Lake charges $10 for day use vs. Oso Flaco is at $5 ?Please
 Keep Oso Flaco a modest nature spot. Put the ORVs if you must at the Phillips 66 Refinery. You are in the process of paving Paradise. It can't be undone once you
slap down that asphalt and let the noisy hordes in.

Diedra Lackey

Oceano Dunes

Fern Miller Godden <fernmg@aol.com>

Sun 2/14/2021 3:47 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear CCC- Please return the beach to access for all, by phasing out vehicles. I, as well as many other friends and neighbors, and of course, bird and wildlife species enjoyed the Oceano dunes beach last year, when vehicles were prohibited. Now it is like walking on the freeway.
Thank you,
Fern Godden
1875 Casitas St.
Oceano, CA.

Sent from my iPhone

Oceano Dunes

Fern Miller Godden <fernmg@aol.com>

Sun 2/14/2021 3:47 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear CCC- Please return the beach to access for all, by phasing out vehicles. I, as well as many other friends and neighbors, and of course, bird and wildlife species enjoyed the Oceano dunes beach last year, when vehicles were prohibited. Now it is like walking on the freeway.
Thank you,
Fern Godden
1875 Casitas St.
Oceano, CA.

Sent from my iPhone

Make Oceano Dunes Vehicle-Free

Kathy Flock <kathyflock@sbcglobal.net>

Sun 2/14/2021 1:31 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Commissioners,

I urge you to adopt your staff's recommendations and tell State Parks to begin the process of phasing out off-highway vehicle use in the Oceano Dunes. The Dunes should be a safe and healthy place for all - animals, people, plants and birds. State Parks new plan does not do this. It is frankly unbelievable that a state park agency would promote OHV use on this coastal land.

Thank you,

Kathy Flock
Los Osos, CA

Protect Oceano Dunes!

thegarmans@aol.com <thegarmans@aol.com>

Sat 2/13/2021 9:23 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Coastal Commissioners,

We all rely on you to help protect our unique coastline for the future, and act decisively when we become aware of activities or proposed changes that will erode and destroy this limited resource.

I first learned about the Oceano Dunes State Recreational Vehicle Area in the 1980's, I was surprised a significant portion of the coastline seemed designated for destruction, allowing any and all vehicles to actively "tear it up" on a constant basis. The concept seemed irresponsible and outdated to me at that time and I naively assumed the process would gradually "go away", since it appeared the public was learning more about our human impact on nature and the horrific consequences of unchecked abuse to our planet and its inhabitants, including ourselves.

In 2021 I now find myself retired and newly residing in Shell Beach. On a regular basis I receive weather alerts advising of unhealthy air quality in Pismo, Oceano, Nipomo and the Mesa from dust spreading from the ODSRVA. From my deck I daily see "smog" over the areas south of me, appearing to stretch inland from the dunes across the Five Cities area. It is a disturbing sight for an area with little industry and such a small population. The future does not bode well if this activity continues unrestrained.

My husband and I regularly walk Pismo Beach for health and recreation, but find it too unsafe and unpleasant to venture south past Grand Ave, due to the abundance and often irresponsible use of vehicles on the beach on the ODSRVA. Over the years we have continually learned in news reports of violent and often fatal collisions on the dunes. Our few forays into the "drive on beach" area have left us disturbed and saddened about the abuse of this land. Reports of activities on the dunes reflect little concern for the land or the local communities, along with unfettered destruction for pleasure and profit.

I understand the folks who ride their vehicles over the dunes enjoy that activity and do not want to see it end, but there must be other areas in California with land that is already in disrepair and possibly unfit for other uses, which could be refurbished for such use and could be better situated to allow such an activity with less terrestrial, human and wildlife fallout. And if this activity is popular and financially viable, other privately owned off roading areas in the state will likely spring up to fill any void.

I also understand the local recreation businesses and State Parks may rely on income from the dunes to help them financially. However destruction for profit has always proven to be short sighted and detrimental in numerous and often irreversible ways. Encouraging protection of the Dunes or movement toward it becoming an eco-friendly recreation destination, with adequate protections for the land, its history and its wildlife, may not be the path of least resistance, but it will definitely be the path of greatest benefit long term to all, but especially for this precious coast.

Your mission statement, "The Commission is committed to protecting and enhancing California’s coast and ocean for present and future generations.." certainly suggests that in this instance you will act to protect, enhance and preserve this coastal treasure for now and for the future, and I sincerely hope you will.

Thank you for your hard work protecting the future of our coast,

Susan Garman

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Fri 2/12/2021 10:24 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Kristy Pace (kvpsummer@yahoo.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Friday, February 12, 2021 2:03 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Kristy Pace
4385 Allott Ave. #1
Sherman Oaks, CA 91423
kvpsummer@yahoo.com
(310) 746-8846

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Politics, the Backroom and Oceano Dunes

bill house <pirate805@gmail.com>

Fri 2/12/2021 7:11 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; John.Ainswoth@coastal.ca.gov <John.Ainswoth@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Morales, Maricela@Coastal <Maricela.Morales@coastal.ca.gov>; Erik.howell@erichowell.com <Erik.howell@erichowell.com>; Donne.drownsey@coastal.ca.gov <Donne.drownsey@coastal.ca.gov>; Christie, Sarah@Coastal <Sarah.Christie@coastal.ca.gov>; Haage, Lisa@Coastal <Lisa.Haage@coastal.ca.gov>; Groom, Carole@Coastal <carole.groom@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Selvaraj, Sumi@Coastal <Sumi.Selvaraj@coastal.ca.gov>; Mann, Zahirah@Coastal <zahirah.mann@coastal.ca.gov>
Cc: lrallen24@gmail.com <lrallen24@gmail.com>

Unfortunately it is that time when politics are coming into focus at the Oceano Dunes. I welcome this time as part of the process. If we base our decision solely on the rule of law, environment, air quality, public health, financial impacts and environmental justice the decision to ratify and approve the Coastal Commission compromise recommendations and new conditional use permit are clear and convincing. When you cannot win on the facts the OHV division and groups will only become more desperate and then blame others, make more false claims, threaten more frivolous process lawsuits, attempt to intimidate the commissioners and then play the victim. It is their nuclear option.

The Coastal Commission and staff needs to carefully review and consider the substantial benefits that come with immediate implementation of the compromise recommendations. Clearly to delay and extend will only bring more harm, extremist political unrest and organizational dysfunction at the Oceano Dunes. If we truly want environmental justice and equality then, after forty years and the strategic political delays of the last 18 months, the responsible path forward becomes even more clear and convincing.

Recently a friend and mother living in Oceano asked me how do we tell a five year old to wait five more years until she is ten years old for justice ? I honestly did not have an answer. We must all answer this question before we make a decision on a timeline for implementation at the Oceano Dunes. Humanity, caring, equality, kindness and even forgiveness must be at the heart of this important decision.

#10.30.2020

Protect Oceano Dunes!

Raymond Kiefer <rkcayuga@sbcglobal.net>

Fri 2/12/2021 6:11 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Coastal Commission,

Please cease support of any and all vehicle activities in and on the Oceano Dunes. Such activities are contrary the purpose of the Commission which is to protect and preserve these natural settings. I urge you to move on from from the mayhem caused by the destructive nature of vehicles run amok on what God has created.

Thank you.

Regards,
Randy Kiefer
1018 Church St
SLO, 93401

SVRA at Oceano Dunes Review

John Phipps <phipps.johnq@gmail.com>

Fri 2/12/2021 4:59 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Sirs:

Thank you for standing up to the State Parks Service and limiting off-road activity on Oceano Dunes. The pollution and environmental damage caused by off-road activity has left the SVRA area a shell of what it was 40 years ago. The town of Oceano can move forward without off-road activity that has destroyed the environment of the local area, and caused area residents to avoid the beach and dunes. Please protect Oso Flaco Lake or it will be gone just like the Clams of Pismo Beach and the Butterfly Reserve.

John Phipps
Nipomo California

Opposition to ODSVRA Public Works Plan

Donna Q Groman <dlgroman@hotmail.com>

Fri 2/12/2021 8:00 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I am in favor of the conservation of Oso Flaco Lake and opposed to the ODSVRA Public Works Plan.

Opposition to plan

Judge DQG <judgegroman@gmail.com>

Fri 2/12/2021 7:59 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I am in favor of the conservation of Oso Flaco Lake and opposed to the ODSVRA Public Works Plan.

Protect Oceano Dunes!

Judy Gaskell <judygaskell@gmail.com>

Fri 2/12/2021 6:45 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

I stand with the Sierra Club in asking you to implement your proposed amendments to the State Park's Permit and to begin to phase out OHV activity in the Oceano Dunes. I want to offer my personal perspective on this issue. When my husband, daughter and I moved to the Central Coast in January 1995, we stayed in a vacation rental in the Oceano Beach area, and we were blown away by the beauty of the beach and the marsh during a very rainy winter season. The weather must have curtailed the park activity that January because we had no idea that this beautiful natural beach was actually a recreational highway. I was horrified when I discovered that California could have so little respect for its most iconic natural resource. As a native Texan, I still don't understand how California can take its beautiful coastline for granted. I understand that families value the tradition of driving on the beach and that many people consider OHV's to be great fun, but I cannot support destroying the environment for the sake of amusement. I've had the misfortune of walking on the beach and witnessing vehicles driving in the shallow water intentionally disturbing the shorebirds. I imagine that's not allowed but there were no park personnel to prohibit it. Another thing that astounds me is how little concern is given to the safety risks that the OHV activities impose. I'm always shocked at how many people are hurt or killed each year by vehicles in the dunes. When I worked at Arroyo Grande High School, a student who lived in Oceano Beach told me how he had been injured by a vehicle as a child, and he said that accidents like his are common for residents. It makes no sense to promote high risk activities on public land. Vehicles on the beach are bad for birds, bad for air quality, bad for the climate, bad for the children who live near the beach now and for children of the future who will have to live with the negative consequences of our short-sightedness. There is no longer any justification for the Oceano Dunes SVRA in its current form. We must transition now to a healthier, more sustainable management of our beautiful beach and dunes.

Thank you for your efforts to protect the California coast.

Sincerely,
Judy Gaskell

Oceano Dunes: Begin the process to remove off-highway vehicles

Terre Dunivant <gaia@charter.net>

Fri 2/12/2021 1:30 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Coastal Commissioners,

Adopt staff recommendations to begin the process of phasing out off-highway vehicle use, and make the Dunes a safer and healthier place for all.

Thank you,
Terre Dunivant
San Luis Obispo, CA

---- |||| ---- |||| ---- |||| ---- |||| ---- |||| ---

Terre Dunivant
Meadow Park | South Hills
San Luis Obispo, California
(805) 704-5433

----- |||| ---- |||| ---- |||| ---- |||| ---- |||| —

"A human being
is a part of the whole,
called by us the 'Universe'.
Our task must be to
widen our circle of compassion to
embrace all living creatures and the
whole of Nature in its beauty."
~ Albert Einstein ~

compromise

Cindy & George Hansen <cingemanor@aol.com>

Thu 2/11/2021 9:19 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Is it possible to allow a small number of people to ride the dunes, by reservation only, under strict safety and environmentally appropriate rules?
Personally, I don't like off road vehicles, and I surf and enjoy the Oceano beach much more without the vehicle traffic, but I appreciate that many people really enjoy riding the dunes.
George Hansen, MD
3775 Santa Manuela RD
Arroyo Grande, CA 93420

Public comment about ODD

Jan Ojerholm <janojer@gmail.com>

Thu 2/11/2021 9:11 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Coastal Commission members,

I support staff recommendations except in a couple of areas.
Please move your timeline up for closing the dunes from Pier Ave. to Oso Flaco to all types of vehicles and camping. State Parks has had years to fix all the problems you have listed in past hearings and reports. It hasn't happened. And now, State Parks wants to expand riding and camping in this very special ecosystem.

I am having a hard time visualizing the same amount of campers in the stretch between Grand Ave. and Pier Ave. that currently have access to dune camping. True, it would be easier to police and control. With more vehicles in that area a much used beach walking area from downtown Pismo to Pier Ave. will be compromised. Instead, severely limit campers, shutdown camping in the dunes now, no faze out period. Shutting it down should be very simple in the time of covid19. It has been shut down for most of 2020. Ah yes, covid19. The close camping conditions, big parties and family groups, unauthorized events that draw big crowds - most of whom are not local folks with the same dedication to wearing face masks - is another good reason to CLOSE VEHICULAR USE NOW! from Pier Ave. to Oso Flaco.

Instead of spending money to develop a campground at Oso Flaco spend money to fix the flooding problem at North Oceano Campground.

A big sigh of relief was heard from most local citizens when the park was closed to vehicles for covid19. All kinds of people were able to enjoy walking, fishing, playing in the surf, riding horses, riding bikes, enjoying the peace and quiet, birding, and feeling safe.

State Parks are supposed to protect resources for perpetuity. It will not happen at ODD as long as vehicular recreation is a priority. Snowy Plovers can't nest peacefully, steelhead might be able to come back up Arrroyo Grande Creek with no vehicles crossing the creek, too many downwind neighbors have had their health compromised. This is a huge reason to shut down vehicular traffic in the dunes. As you know, scientists say it will take years for a more solid crust to form in the dunes that will reduce particulates blowing into homes and lungs.

There are many other places for OHV fun in California. Just because families have been doing it for decades doesn't mean it should continue. Family fun comes and goes, but the resource is there for all people, for all time.

Give Oceano a chance to develop its own personality in its own neighborhood. It will never achieve its potential if Pier Ave. continues to be just a road out to the dunes for folks who have everything they need in their RVs and no need or interest in spending time in Oceano town.

Please let science be your guide.
Thank you for your consideration,

Jan Ojerholm
Grover Beach, on-foot beach user
-

Re: Oceano Dunes Sustainability and Accessibility for all People

Katherine Christensen <alohakate22@gmail.com>

Thu 2/11/2021 6:47 PM

To: Coastal Commission <oceanDunesReview@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>
Cc: Jordan Cunningham <assemblymember.cunningham@assembly.ca.gov>; Dawn Ortiz Legg <abeals@co.slo.ca.us>; Bruce Gibson <bgibson@co.slo.ca.gov>; Lynn Compton <lcompton@co.clo.ca.gov>; engaged Buddhists <engaged-buddhists@googlegroups.com>

Thank you Commissioners, State Parks involved public. I appreciate all of you who work to preserve our beautiful natural coastline in California.

The Coastal Commission is dedicated to the mission of protecting and enhancing California's coast and ocean for present and future generations through careful planning and regulation of environmentally sustainable development. I am grateful for your work. We depend on you to ensure that all use conforms to the law.

State Parks is equally committed to provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity while fostering high-quality outdoor recreation with accessibility to all people.

This long standing issue of the Dunes is painful. While my heart goes out to the families enjoy OHV camping as I enjoyed it with my family in the '60s. Now we all know the time has come for all of us to acknowledge that this use is not environmentally sustainable, it is not equitable, it does not provide for the health, inspiration, and education of all people of California, and not in the best interest of the future for the Central Coast, and it harms the marginalized communities of Oceano Beach and Nipomo.

NOW the urgency is real. Each decision we make matters greatly. I urge the Comissioners and decision makers to protect the future by ensuring well -regulated sustainable use of the Oceano Beach and Dunes in conformance with the Coastal Act and Endangered Species Act.

We only have one chance to get this right. The time is now; it is not five years down the road.

Thank you I appreciate all your efforts.

Kate Christensen

Avila Beach, CA
35 Days to March 18th

Fw: Oso Flaco Lake Improvement Project

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Thu 2/11/2021 8:57 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Valerie Benveniste <valbenveniste@gmail.com>
Sent: Thursday, February 11, 2021 9:06 AM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; OceanoDunes.PWP.EIR@parks.ca.gov <OceanoDunes.PWP.EIR@parks.ca.gov>
Subject: Oso Flaco Lake Improvement Project

Project Name: Oso Flaco Lake Improvement Project

Full Name: Valerie Benveniste

Email: valbenveniste@gmail.com

The environs of Oso Flaco Lake are precious. It is a long-standing natural habitat for a number of rare, threatened, and endangered species. The dunes windward of this region have been stabilized at great expense by planting and maintaining native vegetation. It is nearly pristine. The boardwalks increased access to allow families with young children and elders to benefit from this natural resource. Development of this area will significantly detract from, not add to, the pleasure that families enjoy daily.

We implore you to recognize the benefit of keeping this area pristine, and abandon the plan to “Pave Paradise and Put Up a Parking (and RV) Lot”.

Chaver, Yair@Coastal

From: Chaver, Yair@Coastal
Sent: Wednesday, January 11, 2017 3:31 PM
To: Chaver, Yair@Coastal
Subject: FW: NOAA rec

From: Brittany Struck - NOAA Federal [mailto:brittany.struck@noaa.gov]
Sent: Tuesday, January 10, 2017 12:33 PM
To: Chaver, Yair@Coastal
Cc: Koteen, Laurie@Coastal; Garske, Lauren@Coastal
Subject: follow up from Dec. 14, 2016, conference call

Hi Yair,

This is a follow up email I promised to you all back in December. Below summarizes the suggested revisions we provided to State Parks on creek-crossing guidelines for Arroyo Grande Creek. These park guidelines help the park in making a decision to prohibit crossing of the creek within the State Vehicle Recreation Area. These guidelines are of interest to NOAA Fisheries as the subject crossing is within designated critical habitat for threatened south-central California steelhead. The specific track changes to the creek-crossing guidelines word document was provided to State Parks on December 23, 2016.

1. We suggested that the intent of the guidance should include a specific reference to protecting designated critical habitat for threatened south-central steelhead, rather than simply stating "...protect the waterway from pollution...".

2. We suggested a third condition criterion to be considered when deciding to prohibit creek crossing. This third criterion would be during the winter and spring migration season for both adult and juvenile steelhead when complete hydrologic connectivity exists between Arroyo Grande Creek lagoon and the ocean with a water-column depth of approximately 1 foot or more. We also suggested the option of closing the crossing during a storm event and up to 48-hours after the storm ceases or until connectivity conditions no longer prevail.

3. We suggested a more conservative axel/hubcap crossing criterion from mid-hubcap to a quarter-hubcap because at these lower water levels, the risk of encountering a steelhead is dramatically reduced.

4. We suggested general language that brings awareness to the fact that the days during and following winter and spring storms of significant magnitude, steelhead are either attempting to access the lagoon or leave the lagoon for ocean entry when there is complete hydrologic connectivity between these two habitats.

NOAA Fisheries is here to simply advise and make recommendations to State Parks to minimize and avoid impacts to federally listed salmonids. We hope State Parks will atleast consider these revisions the next time this document is officially updated. Finally, we are currently coordinating with State Parks on a possible site visit to the subject crossing as early as January 18, 2017, given their schedules and availability.

Thanks,
Brittany

--

Brittany Struck
Natural Resource Management Specialist

U.S. Department of Commerce
NOAA Fisheries West Coast Region
501 West Ocean Blvd., Suite 4200
Long Beach, CA 90802

Office: 562-432-3905
Fax: 562-980-4027
Cell: 214-505-9547
brittany.struck@noaa.gov



"Coming together is a beginning; keeping together is progress; working together is success."
- Henry Ford

Extremism and the Oceano Dunes

bill house <pirate805@gmail.com>

Wed 2/10/2021 10:40 PM

To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>; Haage, Lisa@Coastal <Lisa.Haage@coastal.ca.gov>; Selvaraj, Sumi@Coastal <Sumi.Selvaraj@coastal.ca.gov>; Mann, Zahirah@Coastal <zahirah.mann@coastal.ca.gov>; Faustinos, Belinda@Coastal <belinda.faustinos@coastal.ca.gov>; Luce, Shelley@Coastal <shelley.luce@coastal.ca.gov>; Morales, Maricela@Coastal <Maricela.Morales@coastal.ca.gov>; Rafael.manderman@coastal.ca.gov <Rafael.manderman@coastal.ca.gov>; Diamond, Francine@Coastal <francine.diamond@coastal.ca.gov>; Christie, Sarah@Coastal <Sarah.Christie@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Crowfoot, Wade@CNRA <Wade.Crowfoot@resources.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; Kchristensen22@comcast.net <Kchristensen22@comcast.net>; CCCA3858@gmail.com <CCCA3858@gmail.com>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Glimon@caleja.org <Glimon@caleja.org>; Maricela@causenow.org <Maricela@causenow.org>; Tiffany@caleja.org <Tiffany@caleja.org>; Abeals@co.slo.ca.us <Abeals@co.slo.ca.us>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; Chinook.shin@sen.ca.gov <Chinook.shin@sen.ca.gov>

It is so difficult to explain the breadth of the problems and conflicts at the Oceano Dunes to other people and organizations. Usually we can focus on one problem break it down and find a solution. This is not possible at the Oceano Dunes.

At the Oceano Dunes air quality, public health, the environment, access, systemic racism, civil rights, broken agreements, conflicts of interest, poverty, environmental justice and inequality are all major problems. We do not have one group but multiple groups coming together that have legitimate grievances against State Parks and the OHV division. Often State Parks and the OHV division and their commission are not on the same page or going in the same direction.The OHV division appears to be a rogue organization with their own rules and mandates, often operating without appropriate oversight. That makes things even more difficult. Never have we seen so many problems at one location and in one government agency at the same time.

In addition we must add the political and extremist elements at work to the decision making matrix. The OHV Division, some far right groups who use the central location of the Oceano Dunes to meet, recruit and organize and a few businesses that use the park to make a profit at any cost want to remain in control without any restrictions or regulations. Developing a PWP plan on a dinning room table, in their own words, indicates the level of coordination between the OHV division and leadership of these groups. The symbols, flags and parades make a powerful statement to their followers that they are invincible at the Oceano Dunes. It also sends a horrible message to environmental justice communities. They cannot rewrite their history or go conveniently underground. I requested State Parks and the OHV division to publicly condemn these symbols at the Oceano Dunes and to put up signs at the entrances. Their silence continues to make a clear statement! It reminds us all how embedded these groups are within the OHV Division at the Oceano Dunes.

The Coastal Commission well crafted compromise recommedations solves most of the problems and at the same time provides safe access, vehicles on the beach and low cost camping. It also provides a political pathway for the OHV division to continue at the Oceano Dunes without disrupting employees

lives, it is fair and compassionate.I believe that we need immediate implementation of the Coastal Commission recommendations and have already made the case why that is the best option at this time. Simply, by awarding another extension and waiting we create more peril and conflict at the Oceano Dunes. We can no longer stand back and stand by at the Oceano Dunes.

Dune transition

KS <kvsallaz@gmail.com>

Thu 2/11/2021 4:32 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Oceano Dunes Review team, please transition our Oceano dunes to a vehicle free environment. The time has come . When we know better, we can do better. I know it's been a cherished pastime for locals and visitors to drive on the beach and dunes, but that time is over. It's noisy, polluting and harms the fragile dune environment. People will be able to walk, hike in peace, ride horses, walk dogs in safety and enjoy the waves crashing. I've lived here since 1978 and the time is now to stop the vehicles on the dunes and beach. Thank you for your time, Kathy Sallaz

Sent from my iPad

Oceano Dunes comment - Graugnard

Craig Graugnard <cgraugnard@yahoo.com>

Thu 2/11/2021 12:57 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; OceanoDunes.PWP.EIR@parks.ca.gov <oceanodunes.pwp.eir@parks.ca.gov>

Thank you for this opportunity to share my views on the future of vehicle traffic at Oceano Dunes.

I'm new to the area, recently from Oregon. I'm shocked that the desires of a few, those who want to drive around on the beach, are taking precedent over those who don't.

I was encouraged to hear that during the period of time last year that vehicles were prohibited, native, endangered bird species showed recovery. I assume that process has been reversed by tire tracks.

I also feel sorry for the residents of Oceano who must live with the noise, crime and trash that are generated by this behavior.

If you want to enjoy the beach, why in the world would that mean you have to drive around on it. The coastline here is beautiful.

Let's take this simple step to keep it that way my prohibiting vehicle traffic at Oceano.

Thank you for your consideration.

Best regards,

Craig Graugnard
cgraugnard@yahoo.com
503 984.1952 - Mobile

Letter of Support

rachelle toti <rachelletoti@gmail.com>

Wed 2/10/2021 10:39 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>
Cc: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

February 10, 2021

Dear Director Ainsworth and Coastal Commissioners,

The Coastal Commission's Mission Statement includes protection of coastal resources and public access to the beaches. In a state with 40 million people, types of public access must be controlled to avoid conflicts. For example, dogs and horses are allowed on Oceano Beach, they are not allowed on Manhattan Beach.

The protection of coastal resources is also more difficult with 40 million people. Overuse and misuse are hard to monitor – over time they lead to loss of habitat and wildlife. The Pismo Clam was once plentiful, so were the California Least Tern and Western Snowy Plover. Since driving on the beach occurred for many years, who can say how much of this loss was due to pollution, crushing, or taking of these species?

The question before the Coastal Commission on March 18th is should it continue? Is driving vehicles of all shapes and sizes **beneficial** to the long-term survival of the coastal resources? Is it in compliance with current laws?

The Oceano Dunes Summary seems to address these questions of access and coastal resource preservation. I agree with and support the re-envisioning of Oceano Beach and Dunes to include more beach access for the general public and more protection of coastal resources. Clean air for residents depends on restoration of the dune eco-system.

Local residents are enthusiastic to see the potential for all types of beach activities (fishing, walking, sunbathing, etc.) to return. They also see potential for shops and restaurants in Oceano. What is needed is leadership. The Coastal Commission must lead in this process and I hope you do on March 18th.

Sincerely,

Rachelle Toti

Protect Oceano Dunes!

Anne Julian <juliananne58@gmail.com>

Wed 2/10/2021 9:43 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

One of my greatest pleasures since moving to this area in 1999, is a quiet walk on the beach. It was so wonderful during the March to October closure last year to be able to see and enjoy the unspoiled beauty of the area and the rich nature it has to offer. The slogan "Foot prints instead of tire tracks" sums it up. There are many ways to enjoy the beach without endangering the habitat of the area. This is fragile and once destroyed will never be able to return.

Thank you for your consideration in this most important matter.

Sincerely,

Anne Julian

Sent from my iPad

Protect Oceano Dunes!

Julie Dunn <jdunnfineart@yahoo.com>

Wed 2/10/2021 7:02 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

To whom it may concern,

I'd like to see ALL off-road vehicle activity cease at the Oceano Dunes. I support returning this beautiful and precious part of our Central Coast to it's natural state, and only allowing non-destructive human behavior and activities to be allowed.

Julie Dunn
Atascadero, CA.

Sent from my iPhone

A Fair and Just Timeline for Oceano

bill house <pirate805@gmail.com>

Tue 2/9/2021 6:44 PM

To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; CCCA3858@gmail.com <CCCA3858@gmail.com>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Abeals@co.slo.ca.us <Abeals@co.slo.ca.us>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; Kchristensen22@comcast.net <Kchristensen22@comcast.net>; Christie, Sarah@Coastal <Sarah.Christie@coastal.ca.gov>; Clint.werick@sen.ca.gov <Clint.werick@sen.ca.gov>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Tiffany@caleja.org <Tiffany@caleja.org>; Bonnie@pacificcoastpro.com <Bonnie@pacificcoastpro.com>; Chinook.shin@sen.ca.gov <Chinook.shin@sen.ca.gov>

A lot has changed in our country and the Oceano Dunes during the last year. With this in mind and with a rapid transition already taking place I believe our request to limit vehicles to between Grand and Pier Avenue immediately is logical, resonable, legal, proportional and appropriate. The current updated facts, data and reports support this option.

The overwhelming evidence, facts and law continue to support the Coastal Commission compromise recommendations. That debate has ended and the new PWP only reinforces why immediate change is needed to bring the Oceano Dunes into legal and environmental compliance. The OHV division continues to defy your guidance and recommendations. Clearly their only strategy is political pressure and to make things as difficult as possible and to obstruct.. Next we will have Kevin McCarthy, Devin Nunes, and Jordan Cunningham writing letters to support their political base again. When we remain silent, do nothing or provide another extension it will only create more turmoil, frivolous lawsuits, increase personal attacks, propaganda and bring even more hardships in the future.

After forty years, we have extended every opportunity and courtesy to State Parks and the OHV Division to solve these serious problems. To give them another extension is disingenuous and in the end will not solve any of the serious problems at the Oceano Dunes. A compromise extension will be viewed as another political victory, sign of weakness, and approval signal to continue this political strategy and destructive behavior in the future.

As long as we allow these conditions to continue at the Oceano Dunes we will have air quality, public health, environmental, disporportinate impacts, economic inequality, more politcal unrest, instability and environmental injustices. We have some serious problems that require immediate action.

#10.30.2020

February 9, 2021

To: California Coastal Commission Re: Oceano/Dunes OHV Hearings

Thank you for this opportunity to weigh in on the issue of OHVs on Oceano Dunes/Beach. I realize that this has been a thorny issue that has been debated for the last forty years. It is time, for many reasons, to finally end OHV riding on this beach/dune area. The reasons that are most compelling for me are two and they are interrelated.

First, any decisions made at any level of government must take into account climate change. Specifically decisions must move us toward the National, State and County benchmarks for lowering CO2 emissions. We are at serious risk of reaching climate tipping points in global warming that will significantly impact the possibility of life on our planet. Even if we can lower green house gas emissions enough to avoid the worst of the problems, our region of the country is already experiencing significant negative impacts to health and well being. These conditions will only get worse in the months and years to come due to the rise in temperatures already baked into our planetary systems.

The number of vehicles that descend on the Oceano Dunes area because of OHV access, is staggering. Many, if not most, of these vehicles come from the Central Valley, an average 300 mile round trip. Doing the math for this travel, assuming 1,000 vehicles averaging fuel efficiency of 20 miles/gallon, traveling from the Central Valley 25 weekends per year, and we find a total of 500,000 Tons of CO2 has been emitted just in the drive to and from our coast. On top of that, untold gallons of gasoline are burned by the OHVs brought over each weekend thus emitting many additional tons of CO2 in addition to a great deal of noise pollution. To put this in perspective, to offset CO2 emissions from just the commute-fuel burned over 25 weekends (and more weekends are involved than this each year), approximately 83,000 trees would need to be planted each year. It is impossible for me to calculate how many additional trees would need to be planted to offset the fuel burned by the OHVs themselves. Needless to say, these offset trees have never been planted and are not now being proposed as a mitigation action.

Instead, plants that do naturally grow on the dunes are destroyed by the OHVs. This destruction negatively impacts the nesting areas of the endangered birds of the area. This biological destruction is the second reason that OHVs should be prohibited. In addition to the climate chaos bearing down on us, a significant loss

of biodiversity is also underway. This loss of biodiversity is so severe that science warns it may result in the “Sixth Great Extinction.” Like climate change, this issue needs to be considered by governmental agencies when making decisions that would negatively impact any species, and especially endangered species, of plants or animals.

University of Oxford’s Interdisciplinary Centre for Conservation Science has developed a framework they refer to as the “4Rs.” This framework, if used to make decisions, will lessen negative impacts on species and ecosystems and thus protect biodiversity. The “4Rs” are:

1. Refrain: Avoiding negative impacts on nature.
2. Reduce: Minimizing the harm caused by any unavoidable impacts.
3. Restore: Acting to quickly counteract any harm caused to nature.
4. Renew: Working to improve damaged ecosystems.

Clearly, OHVs on the beach and dunes create negative impacts on nature by increasing fossil fuel emissions, vehicular habitat destruction, and harassment and killing of birds and sea life in the area. Further, the way to minimize the harm caused by human access to the beach and dunes is to end all vehicular access to these areas, including banning on-beach camping. Because we are experiencing the dual crises of climate chaos and biodiversity loss, it is exceedingly important that corrective measures to reduce fossil fuel emissions and protect endangered species be taken quickly and without delay. Therefore, I implore the Commission to act immediately to:

1. ban all recreational vehicles (OHV and street legal) from the beach and the dunes, and
2. direct that all necessary action be taken to repair the damage already done to this ecology.

Remember, please, that time is of the essence. We simply do not have another 5 or 10 years to wait before we begin the repair work to the environmental damage we humans have caused.

Respectfully submitted by
Sharon A. Rippner, Ph.D.
6448 Squire Court
San Luis Obispo, CA. 93401
805-909-0405

Fw: Oceano Dunes SRVA impact on our local communities

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Wed 2/10/2021 4:58 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Alice Reinheimer <alicer1@charter.net>
Sent: Tuesday, February 9, 2021 4:26 PM
To: Coastal Commission <oceanDunesReview@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Jordan Cunningham <assemblymember.cunningham@assembly.ca.gov>; Dawn Ortiz Legg <abeals@co.slo.ca.us>; bgibson@co.slo.ca.us <bgibson@co.slo.ca.us>; district4@co.slo.ca.us <district4@co.slo.ca.us>
Cc: engaged Buddhists <engaged-buddhists@googlegroups.com>
Subject: Oceano Dunes SRVA impact on our local communities

Dear Commissioner:

Thank you for the opportunity to comment on the Pismo State Beach and Oceano Dunes SRVA public works plan and the environmental impact report presented by State Parks. I would like to draw your attention to a local issue not covered in the EIR.

Some of the users of the SRVA show a sense of entitlement and aggressive behavior around what they call “our dunes”. This spills out into the surrounding communities in the form of noise, aggressive driving and other acts. In this note I will speak from my own experience.

I have lived in Arroyo Grande for 21 years and have seen the pickups on Grand Avenue with large confederate flags in the back. Modern use of the confederate flag is considered to be a symbol of the white nationalist movement and a lack of regard for the democratic rule of law. Those who fly the confederate flag are here because of the SRVA. They do not belong in our community.

Two days following the reopening of the beach to vehicles on Oct 30, 2020, I was witness to a parade of pickup trucks with American flags and “Save Our Dunes” flags rallying up Grand Avenue all the way through the Arroyo Grande village, honking, yelling, and making a lot of noise. This was not a celebration; it was a show of intimidation.

The word “Our” in “Save Our Dunes” points directly to the sense of entitlement felt by those who see the dunes as their own private playground.

Here is another example of the culture of entitlement from the "Friends of Oceano Dunes" Facebook page, dated Jan 18, 2021: "For those out at Oceano Dunes today and this week, high tides and surf are expected. Please send over any pictures you get of the high tides going into the 48 acres fenced off closures. We all know that 48 acres was not properly modeled in accordance to the SOA and CEQA, and should have never been taken from us." Notice how the wording, "*should have never been taken from us*", expose the feeling of entitlement.

Clearly, for some of the OHV users on the dunes, there is not a sense of the dunes being for everyone, but rather existing just "for us".

When a group takes over a public space, it becomes a public problem. We would not stand for a gang taking over a public park and calling it its own. Why should we stand for self-entitled off-roaders taking over our public beaches and dunes, making them uninhabitable for everyone else?

This is from a CalCoast Times article dated Sept. 16, 2020, *DA drops charges against defendant in Oceano Dunes shooting case:* "Shortly before midnight on May 4, 2019, shots were fired into a crowd at an unpermitted concert taking place at the Oceano Dunes. About 1,000 people from the Oakland area were in attendance at the concert. Bullets struck and wounded five individuals, each of whom were hospitalized but survived."

What on earth is going on out there???

The dunes and beach do not belong to the OHV users, and our local communities do not belong to the OHV users. As we have seen on a national scale, when an aggressive group feels entitled, bad things can happen. Our local communities deserve to be free of the entitled gangs who try to intimidate us.

I have two immediate requests that I ask you to join me in supporting.

Ban OHVs on the dunes and beach immediately.

Allow only street legal vehicles with license plates for people with disabilities onto the beach.

Sincerely,

Alice Reinheimer
Arroyo Grande, CA

Oceano Dunes Sustainability and Accessibility for all People

Katherine Christensen <alohakate22@gmail.com>

Tue 2/9/2021 11:16 PM

To: Coastal Commission <oceanDunesReview@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>
Cc: Jordan Cunningham <assemblymember.cunningham@assembly.ca.gov>; Dawn Ortiz Legg <abeals@co.slo.ca.us>; Bruce Gibson <bgibson@co.slo.ca.gov>; Lynn Compton <lcompton@co.clo.ca.gov>; engaged Buddhists <engaged-buddhists@googlegroups.com>

Commissioners,

Thank you for your diligent attention to this proposed public works plan and to careful assessment of the environmental impact report presented by State Parks. This plan comes at an auspicious time in our history when Covid 19 has exposed huge disparity and inequalities and has shown a light on marginalized communities. This is a time when the whole world is aware that climate change is real and it is here; we must do all we can to effect polices and regulations that create more fairness and offer the most sustainable economies and land uses. The PWP/EIR offered by State Parks does not really consider the times we find ourselves in. The new Public Works Plan does not address the issues of sustainability and accessibility, nor of inequities and negative consequences of vehicular traffic on the marginalized communities. In fact, the PWP could well cause more damage, possibly irreversible damage.

The plan is concerned mostly about continuing the same program in operation for over 40 years. State Parks has long used the beach entrances at Grand Avenue in Grover Beach, and Pier Avenue in the unincorporated community of Oceano Beach, as “their” vehicular access to the most beautiful and amazing beach in the Central Coast possibly all of California. In 1982 a "temporary" permit was granted to for vehicular beach access and it has continued since that time with few additional regulations even while the use does not conform to the Coastal Act and the Environmental Species protections are allowed to be violated. Now State Parks argues for more development focused on vehicular recreation and even more impacts on the environment. While giving a nod to the idea of phasing out OHV it puts forth a plan for FIVE MORE YEARS of increased vehicular access which means that for five more years the beach is inaccessible to humans that are not within a vehicle. The affected communities of Oceano and Nipomo will continue to suffer and pay the price even as they are held back economically. We are on the brink of destroying this beautiful living environment that is a cherished resource that should be protected right now. We can’t just allow the destruction of the dunes and degradation of the beach to continue for five more years. It is now time for a new vision for a future to be made possible that provides the most good for the most people.

This is now a time to accept that the only way to protect the environment is to end vehicular access to the beach and dunes now, not five years from now. The only responsible course of action is to phase out vehicular recreation starting right now. In this world struggling to survive in the midst of climate change, rising seas, staggering loss of biodiversity and extinction, unbreathable air, ocean pollution from oil and micro plastic, rising temperatures and drought it is ever more important for people connect with and appreciate nature. It is the reality is that we are

all dependent on nature for survival. We are at a tipping point. We do not have five more years to create more damage.

San Luis Obispo County is a destination for visitors from the rest of the state, country and the world. Allowing the OHV community to control and destroy this fragile coastal ecosystem for five more years is wrong headed. The time is now to embrace a new future. The Oceano Beach and Dunes including Oso Flaco Lake must be protected and preserved for all people to appreciate, enjoy, and reconnect with nature. It's time for a new vision of how our local economy can develop to support a sustainable future as a beautiful natural attraction in a way that makes truly accessible to all people, not just those in vehicles.We believe in this new vision.

Thank you so much for your diligent efforts to protect and preserve the environment for future generations while you allow mother nature to protect us.

Sincerely

Kate Christensen

Avila Beach, CA

36 Days until March 18th

February, 2021

Dear Coastal Commissioners,

The recent release of State Parks Public Works plan took 18 months to develop. What was the outcome? A plan that does nothing to protect the environment, air quality, or the safety of pedestrians who want to enjoy the dunes. If anything, it increases the destruction to the environment and adds to air quality, traffic and noise issues.

Now is the time for the Coastal Commission to follow thru on the plan to reimagine the park and open it up to all people who can enjoy this magnificent geological wonder.

Allow the area between Grand and Pier Ave for day camping and those who need to be driven to the beach area. Now is the time to make this park open to all. Many of us have never seen or been able to enjoy the dunes until the closure to OHV activity last year.

The park is a gigantic recreation area for vacationers and local residents alike. By making the dunes accessible to more people this will lead to the expansion of businesses and the improvement of the economy for the local communities.

Let's protect this fragile coastal dunes and open it up to the growing number of people who have recently discovered the ability to safely enjoy beach type activities in this extremely unique area.
It is time for the Coastal Commission to follow thru on its plan to reimagine the park.

Linda Reynolds
Nipomo, Ca

Oceano Dunes SRVA impact on our local communities

Alice Reinheimer <alicer1@charter.net>

Wed 2/10/2021 12:26 AM

To: Coastal Commission <oceanDunesReview@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Jordan Cunningham <assemblymember.cunningham@assembly.ca.gov>; Dawn Ortiz Legg <abeals@co.slo.ca.us>; bgibson@co.slo.ca.us <bgibson@co.slo.ca.us>; district4@co.slo.ca.us <district4@co.slo.ca.us>
Cc: engaged Buddhists <engaged-buddhists@googlegroups.com>

Dear Commissioner:

Thank you for the opportunity to comment on the Pismo State Beach and Oceano Dunes SRVA public works plan and the environmental impact report presented by State Parks. I would like to draw your attention to a local issue not covered in the EIR.

Some of the users of the SRVA show a sense of entitlement and aggressive behavior around what they call “our dunes”. This spills out into the surrounding communities in the form of noise, aggressive driving and other acts. In this note I will speak from my own experience.

I have lived in Arroyo Grande for 21 years and have seen the pickups on Grand Avenue with large confederate flags in the back. Modern use of the confederate flag is considered to be a symbol of the white nationalist movement and a lack of regard for the democratic rule of law. Those who fly the confederate flag are here because of the SRVA. They do not belong in our community.

Two days following the reopening of the beach to vehicles on Oct 30, 2020, I was witness to a parade of pickup trucks with American flags and “Save Our Dunes” flags rallying up Grand Avenue all the way through the Arroyo Grande village, honking, yelling, and making a lot of noise. This was not a celebration; it was a show of intimidation.

The word “Our” in “Save Our Dunes” points directly to the sense of entitlement felt by those who see the dunes as their own private playground.

Here is another example of the culture of entitlement from the “Friends of Oceano Dunes” Facebook page, dated Jan 18, 2021: “For those out at Oceano Dunes today and this week, high tides and surf are expected. Please send over any pictures you get of the high tides going into the 48 acres fenced off closures. We all know that 48 acres was not properly modeled in accordance to the SOA and CEQA, and should have never been taken from us.” Notice how the wording, “*should have never been taken from us*”, expose the feeling of entitlement.

Clearly, for some of the OHV users on the dunes, there is not a sense of the dunes being for everyone, but rather existing just “for us”.

When a group takes over a public space, it becomes a public problem. We would not stand for a gang taking over a public park and calling it its own. Why should we stand for self-entitled off-roaders taking over our public beaches and dunes, making them uninhabitable for everyone else?

This is from a CalCoast Times article dated Sept. 16, 2020, *DA drops charges against defendant in Oceano Dunes shooting case:* “Shortly before midnight on May 4, 2019, shots were fired into a crowd at an unpermitted concert taking place at the Oceano Dunes. About 1,000 people from the Oakland area were in attendance at the concert. Bullets struck and wounded five individuals, each of whom were hospitalized but survived.”

What on earth is going on out there???

The dunes and beach do not belong to the OHV users, and our local communities do not belong to the OHV users. As we have seen on a national scale, when an aggressive group feels entitled, bad things can happen. Our local communities deserve to be free of the entitled gangs who try to intimidate us.

I have two immediate requests that I ask you to join me in supporting.

Ban OHVs on the dunes and beach immediately.

Allow only street legal vehicles with license plates for people with disabilities onto the beach.

Sincerely,

Alice Reinheimer
Arroyo Grande, CA

FW: Oceano Dunes Sustainability and Accessibility for all People

Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Tue 2/9/2021 11:19 PM
To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Katherine Christensen <alohakate22@gmail.com>
Sent: Tuesday, February 09, 2021 3:17 PM
To: Coastal Commission <oceanDunesReview@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>
Cc: Jordan Cunningham <assemblymember.cunningham@assembly.ca.gov>; Dawn Ortiz Legg <abeals@co.slo.ca.us>; Bruce Gibson <bgibson@co.slo.ca.gov>; Lynn Compton <lcompton@co.clo.ca.gov>; engaged Buddhists <engaged-buddhists@googlegroups.com>
Subject: Oceano Dunes Sustainability and Accessibility for all People

Commissioners,
Thank you for your diligent attention to this proposed public works plan and to careful assessment of the environmental impact report presented by State Parks. This plan comes at an auspicious time in our history when Covid 19 has exposed huge disparity and inequalities and has shown a light on marginalized communities. This is a time when the whole world is aware that climate change is real and it is here; we must do all we can to effect polices and regulations that create more fairness and offer the most sustainable economies and land uses. The PWP/EIR offered by State Parks does not really consider the times we find ourselves in. The new Public Works Plan does not address the issues of sustainability and accessibility, nor of inequities and negative consequences of vehicular traffic on the marginalized communities. In fact, the PWP could well cause more damage, possibly irreversible damage.
The plan is concerned mostly about continuing the same program in operation for over 40 years. State Parks has long used the beach entrances at Grand Avenue in Grover Beach, and Pier Avenue in the unincorporated community of Oceano Beach, as “their” vehicular access to the most beautiful and amazing beach in the Central Coast possibly all of California. In 1982 a "temporary" permit was granted to for vehicular beach access and it has continued since that time with few additional regulations even while the use does not conform to the Coastal Act and the Environmental Species protections are allowed to be violated. Now State Parks argues for more development focused on vehicular recreation and even more impacts on the environment. While giving a nod to the idea of phasing out OHV it puts forth a plan for FIVE MORE YEARS of increased vehicular access which means that for five more years the beach is inaccessible to humans that are not within a vehicle. The affected communities of Oceano and Nipomo will continue to suffer and pay the price even as they are held back economically. We are on the brink of destroying this beautiful living environment that is a cherished resource that should be protected right now. We can’t just allow the destruction of the dunes and degradation of the beach to continue for five more years. It is now time for a new vision for a future to be made possible that provides the most good for the most people.
This is now a time to accept that the only way to protect the environment is to end vehicular access to the beach and dunes now, not five years from now. The only responsible course of action is to phase out vehicular recreation starting right now. In this world struggling to survive in

the midst of climate change, rising seas, staggering loss of biodiversity and extinction, unbreathable air, ocean pollution from oil and micro plastic, rising temperatures and drought it is ever more important for people connect with and appreciate nature. It is the reality is that we are all dependent on nature for survival. We are at a tipping point. We do not have five more years to create more damage.

San Luis Obispo County is a destination for visitors from the rest of the state, country and the world. Allowing the OHV community to control and destroy this fragile coastal ecosystem for five more years is wrong headed. The time is now to embrace a new future. The Oceano Beach and Dunes including Oso Flaco Lake must be protected and preserved for all people to appreciate, enjoy, and reconnect with nature. It's time for a new vision of how our local economy can develop to support a sustainable future as a beautiful natural attraction in a way that makes truly accessible to all people, not just those in vehicles.We believe in this new vision.

Thank you so much for your diligent efforts to protect and preserve the environment for future generations while you allow mother nature to protect us.

Sincerely
Kate Christensen
Avila Beach, CA
36 Days until March 18th

ODSVRA PWP and Oso Flaco Lake

michael bondello <mbondello@gmail.com>

Tue 2/9/2021 9:58 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla, Commissioners, and Staff:

I've lost track of how many times I have written this same letter to you and the staff of the ODSVRA. It is in opposition to their plans to develop the area around Oso Flaco Lake for further OHV activity. Their plans are counter to our Local Coastal Plan, findings of the California Department of Fish and Wildlife (CDF&W), and recommendations of leading conservation groups including the California Native Plant Society, the Sierra Club, the Audubon Society, the Center for Biological Diversity, to name a few. I also believe their plans fly in the face of common sense and good planning practices.

Over forty years ago, as a member of the local Sierra Club's Dune Task Force, I was able to help convince State Parks to shelve their plans to develop this region as a southern OHV entrance to the dunes. Then, two years ago, they came back with the same plan on steroids. Not only do they plan for an OHV staging area, they also want to include a campground with permanent facilities,OHV training track, and an OHV trail into the dunes on the windward side of Oso Flaco Lake. Have they learned nothing in this time? Is pure obstinance their only virtue?

OK, you know the drill. CDF&W indicates the environs of Oso Flaco Lake as the highest value area of natural resources in California. It is a center of endemism for a number of rare, threatened, and endangered species. The dunes windward of this region have been stabilized at great expense by planting and maintaining native vegetation. If you allow these windward dunes to be destabilized by allowing OHVs to run over them, then it would reverse decades of expense and effort to try and save the area. What are their planners thinking?

I was at the July, 2019 meeting when their planners were granted time to develop their PWP. Very specific deadlines were established for compliance with the Coastal Commission's recommendations. As we emptied out of the meeting I heard two of their planners say that there was no way they could comply with the conditions of their reprieve. How many of their deadlines did they meet? How compliant were they with your recommendations? Don't worry about answering.. After viewing their PWP, I can see that they didn't even try.

I have been arguing for environmental protection for sensitive dune areas from OHV intrusion since 1975, first in the California deserts and then here. I have performed research on their deleterious effects and can tell you that there is absolutely no way in which OHVs are compatible, in any sense, with intrusion into fragile dune habitats. They are destructive, in every sense, to the geological and biological features that stabilize and maintain these fragile environments. So, once and for all, slam the door on these guys! They do not deserve another chance, but the dunes and their native inhabitants do. Do the right thing!

Michael C. Bondello
Professor Emeritus
Allan Hancock College

It's about time.

John Anderson <truegrit44@gmail.com>

Tue 2/9/2021 9:33 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I fully support the proposed plan for creating camping closer to Pismo Beach and Oceano and removing motorized vehicles south of Pier Ave in Oceano. The current OHVR area would never be approved in today's enlightened environment. You will hear from the OHV community that you are trampling on their "Rights". Where is it written that they have the right to trample a sensitive habitat such as the dunes, create an air quality health crisis and dismantle the natural peacefulness of the dune environment?

The Coastal Commission will also hear about alleged negative impacts to the local economy if the OHVR park is altered. Contrary to the OHV supporters, a recent Cal Poly report debunked that claim and showed the economy thrived during the time the park was closed due to Covid. But the economy shouldn't be a reason to allow continued OHV activity in the park. Citizen's health and the environment trump economics.

Please adopt the staff recommendation and put an end to the insanity of the OHVR park in its current form and especially in the State Park's proposed plan.

John Anderson
Nipomo, CA

End the occupation

Alice Reinheimer <alicer1@charter.net>

Tue 2/9/2021 8:57 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Commissioners:

The Oceano Dunes SRVA is being occupied by people who feel entitled to use it however they want, making it unfit for use by the general public. It has gone too far and it needs to stop.

I have lived in Arroyo Grande for 21 years and have seen the pickups on Grand Avenue with large confederate flags in the back. Modern use of the confederate flag is considered to be a symbol of the white nationalist movement and a lack of regard for the democratic rule of law.

Two days following the reopening of the beach to vehicles on Oct 30, 2020, I was witness to a parade of pickup trucks with American flags and "Save Our Dunes" flags rallying up Grand Avenue all the way through the Arroyo Grande village, honking, yelling, and making a lot of noise. This was not a celebration; it was a show of intimidation.

The word "Our" in "Save Our Dunes" points directly to the sense of entitlement felt by those who see the dunes as their own private playground.

Here is another example of the culture of entitlement from the "Friends of Oceano Dunes" Facebook page, dated Jan 18, 2021:

"For those out at Oceano Dunes today and this week, high tides and surf are expected. Please send over any pictures you get of the high tides going into the 48 acres fenced off closures. We all know that 48 acres was not properly modeled in accordance to the SOA and CEQA, and ***should have never been taken from us***." [emphasis added]

Notice how the wording, "***should have never been taken from us***", expose the feeling of entitlement.

Clearly, for some of the off roaders, there is not a sense of the dunes being for everyone but rather existing just "for us".

When a group takes over a public space, it becomes a public problem. We would not stand for a gang taking over a public park and calling it their own. Why should we stand for self-entitled off roaders taking over our public beaches and dunes, making them uninhabitable for everyone else?

This is from a CalCoast Times article dated Sept. 16, 2020, *DA drops charges against defendant in Oceano Dunes shooting case*.

"Shortly before midnight on May 4, 2019, shots were fired into a crowd at an unpermitted concert taking place at the Oceano Dunes. About 1,000 people from the Oakland area were in attendance at the concert. Bullets struck and wounded five individuals, each of whom were hospitalized but survived."

What on earth is going on out there???

This is not recreation, it is an occupation. It has gone too far and must be stopped now, immediately, with no 5 year phase out.

The dunes are a unique ecosystem which deserve to be enjoyed by everyone. Our local communities need to be free of the entitled gangs who try to intimidate us.

Ban OHV's on the dunes immediately.

Allow only street legal vehicles with disabled stickers onto the beach.

Sincerely,

Alice Reinheimer
Arroyo Grande, CA

Protect Oceano Dunes!

Matt McGurrin <mmcgurrin@att.net>

Tue 2/9/2021 8:45 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Commission Members,
I do not approve of the expansion of usage proposed by California State Parks at the Oceano Dunes. I would support the further restriction of the off-road use in the Oceano Dunes Park. So many people are killed or injured each year because of the currently approved off-road vehicle use. California State Parks should be protecting these areas and not allowing the destructive use currently imposed in this coastal zone. There are several protected flora and fauna that are being harmed by the off-road vehicle traffic. I was a State Park employee for thirty years in this area of California and Oceano was one of my areas of responsibility. Thank you.

Sincerely,
Matt McGurrin
3325 Bradford Circle
Cambria, CA 93428

Virus-free. www.avast.com

TO: The California Coastal Commission
FROM: Jan Howell Marx JD
RE: Oceano Dunes Review March 18, 2021
DATE: February 9, 2021

I am a San Luis Obispo City Council Member, former SLO Mayor and current Board Member of the SLO Air Pollution Control District Board (APCD), however I am writing in my capacity as a private individual, environmentalist and long time SLO resident.

I strongly oppose the draft State Parks draft plan to maintain and expand vehicular and OHV use and development of the ESHA Oso Flaco Lake to include new campgrounds and new OHV access and facilities. This would negatively impact Oso Flaco which is an ADA compliant, peaceful, and low impact recreational site, as well as destroy its high environmental value. Too long, State Parks has aggressively evaded compliance with the Health Code, the APCD hearing board's orders, and CEQA, to the detriment of local residents' health, the environment, and the Coastal Act. The territorial domination of the Oceano Dunes Park by OHV enthusiasts has not only made the Park dangerous to pedestrians, neighbors, and wildlife, but has also failed to include diverse members of the public. The Park belongs to everyone, not just those who can afford OHVs.

I strongly support the tentative staff recommendation for the March 18, 2021 hearing to "reimagine the Park operating in more environmentally sustainable and legally consistent way." Phasing out off-roading over five years while expanding other kinds of recreational uses will provide expanded access to the Dunes for everyone, reduce dust emissions and better protect the environment. Significantly, the staff proposal finally gives residents of the underserved community of Oceano direct access to their beach. Moving the campgrounds northward makes sense, environmentally and economically, since campers could then more easily access restaurants and shops of bordering cities.

As substantiated by the recent study by Professor Patel of Cal Poly, the absence of OHVs from the Park during the COVID closure did not negatively impact the local economy and in fact, increased hotel bookings. The Park, surrounding communities, visitors from diverse kinds of backgrounds and the environment would all benefit tremendously from the Commission's reimagining and improving the Park's "visitor serving" uses as proposed in the tentative staff recommendation.

Thank you for considering,

Jan Howell Marx, JD

Oceano Dunes

Linda Sardi <lsardi@jlacq.com>

Tue 2/9/2021 6:53 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Our concerns are not only degradation of natural habitat, health impacts from air pollution, and harm to native species but the numerous DEATHS & accidents that occur each year on the Dunes. Isn't saving lives a major concern or letting the crazies continue to kill themselves by leaving the Dunes open to riders?

Linda & John Sardi
922 Bea Court
Nipomo, CA 93444

Protect Oceano Dunes!

Safron Rossi <safron.rossi@gmail.com>

Tue 2/9/2021 5:35 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Safron Rossi, Ph.D.
Sierra Club Santa Lucia Chapter

Protect Oceano Dunes!

Lauri Jasprica Graham <bayblue2@hotmail.com>

Tue 2/9/2021 4:39 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Lauri Graham

Sierra Club Santa Lucia Chapter

Protect Oceano Dunes!

Mary Eister <meister@fix.net>

Tue 2/9/2021 2:34 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Coastal Commission Representatives,

I am deeply concerned with the lack of urgency that the State Parks have exhibited in producing an environmentally acceptable management plan for the Oceano Dunes. It is time to begin phasing out off road vehicles. The Guadalupe-Nipomo dunes complex is a fragile coastal park providing habitat for threatened species. Protection of this beautiful, wild area of the coast is not compatible with off road vehicles. This is not new information. It is time to enforce compliance with environmental regulations. To prohibit off road vehicles on our beaches and dunes is to create an environment which invites different forms or public access and recreation, one which honors the fragility of this gem which we have in our "backyard."

Please act now. Require compliance by the State Parks.

Sincerely,
Mary (and Garry) Eister
Arroyo Grande
33 year resident of the Central Coast

Protect Oceano Dunes!

Diane Levison <dilevison@hotmail.com>

Tue 2/9/2021 2:18 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Come on! There doesn't seem to be a decrease in income for the area. So why on earth would you even begin to consider opening this beautiful asset to destructive activities like the ridiculous zooming around in dangerous vehicles. Diane Levison

Phase Out Off-Road Vehicles at the Oceano Dunes

lwickham@sbcglobal.net <lwickham@sbcglobal.net>

Tue 2/9/2021 2:16 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Commissioners,

I'm writing to urge you to implement the recommendations of your staff to ensure sustainable management of the Oceano Dunes. Off-road vehicles must be phased out to protect threatened species and environmentally sensitive habitat. Please amend the coastal permit for the park to begin phasing out off-road activity on the dunes.

Thank you,

Lyn Wickham
701 Anchor Street
Morro Bay, CA 93442
lwickham@sbcglobal.net
805-459-7420

February 8, 2021

Dear Director Ainsworth and Coastal Commissioners,

Concerned Citizens for Clean Air supporters are very encouraged by the attached report by Cal-Poly Associate Professor Anilkumar Patel titled "Economic Impact from the Suspension of Vehicular Use at the Oceano Dunes SVRA". For many people the mathematics of the supposedly great economic boost from the OHV users visiting the Central Coast did not add up. Finally here is a report based on actual, unemployment figures and bed tax data comparing several local towns and neighboring counties economic activity during the months the beach was closed to vehicles. It concludes: **there was no statistical evidence of a negative impact from the suspension of driving on the beach.**

CCCA's mission is to advocate for appropriate mitigation in the dunes to reduce the dust emissions to natural background levels, as it would be without riding on the dunes. Getting that mitigation done has been a long laborious process to date. Should the riding be greatly reduced or eliminated, that would surely accelerate the dunes "self-restoration" and clean up our air.

We hope you will take the time to read the study.
Sincerely,

Arlene Versaw and Rachelle Toti
Co-founders, CCCA



ECONOMIC IMPACT FROM SUSPENSION OF THE VEHICULAR USE AT THE OCEANO DUNES SVRA

Pratish Anilkumar Patel
Associate Professor
Finance Department
California Polytechnic State University
San Luis Obispo
ppatel29@calpoly.edu

ABSTRACT

On March 28, 2020, the California State Parks suspended vehicles at the Oceano Dunes SVRA. In this report, I analyze the suspension's economic impact for the San Luis Obispo County (County). Before the suspension, prior studies, using a survey-based approach, claimed that the vehicular use is pivotal to the county's economy. A survey-based approach indirectly measures the impact and suffers from selection bias. For example, if most responders are vehicle users, then the approach overstates the impact. I use an alternative approach. Using a Difference in Difference (DiD) approach, I claim that the suspension had a minimum impact on the Transit Oriented Tax (TOT) and County's unemployed. By using location data, I find that time spent at County's parks follows a similar pattern as nearby counties. Using small business revenue data, I find that the County's revenue decline pattern was similar to other nearby counties. That is, the suspension did not disproportionately affect the County. Overall, contrary to the implications from previous studies, I do not find a significant decline in economic impact from the suspension.

Table of Contents

List of Figures

.....iii Executive Summary..... 1
Background 1
Summary of Research Methods 4
Main Findings 6
Circumstantial Evidence 6
Smoking Gun Evidence..... 6
Analysis .....
7 Circumstantial Evidence involving Google Trends Data..... 7
Circumstantial Evidence involving Google's time use data 10
Circumstantial Evidence involving Womply's small business data..... 12
Smoking Gun Evidence involving Labor Force..... 14
Smoking Gun Evidence involving TOT Revenue..... 18
Univariate Analysis 19
Multivariate Analysis — A DiD approach..... 22
Conclusion .....
27

List of Figures

Figure 1: This figure shows the search intensity of different keywords using Google Trends .....
9 Figure 2: This figure shows the search intensity of different keywords using Google Trends. Note that the search intensity is relative. The Y-axis measuring intensity of "Beach ATV" is different from Y-axis of this figure. .....
10 Figure 3: This figure shows the time spent at parks relative to January 2020 across three counties: San Luis Obispo, Monterey, and Santa Barbara ..... 11 Figure 4: This plot shows the change in small business revenue relative to January 2020.
.....
13 Figure 5: This figure shows the number of open small businesses relative to January 20202.....
16 Figure 6: This figure shows the number of unemployed in the San Luis Obispo MSA and its neighbors. The monthly data is from the Bureau of Labor Statistics. .....
16 Figure 7: This figure shows a box plot of the monthly changes in the number of unemployed. The OHV activity was suspended in the State Park from April 2020 to November 2020.....
18 Figure 8: This figure shows the TOT revenue across Avila Beach, Nipomo and

Oceano. The data is the publicly available at the tourism website. ..... 20 Figure 9: The blue chart shows Avila Beach's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended. ..... 21 Figure 10: The blue chart shows Nipomo's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended. 21

Figure 11: The blue chart shows Oceano's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended. 22

Executive Summary

Background

Off-highway Vehicle (OHV) recreation is the top attraction in Oceano according to Trip Advisor. [1] But the vehicle use causes environmental loss as it damages sensitive habitat areas and the nesting area of endangered California shorebirds like snowy plovers. [2] Naturally, the vehicle use also causes pollution; it leads to erosion and it leads to lingering trash. Then, there is a tradeoff. On one hand, the vehicle use is positive for the San Luis Obispo County's (referred as the "County") economy as it serves as a tourist magnet. California State Parks hired SMG Consulting (SMG) to study the local economic impact of visitors to the Oceano Dunes State Vehicular Recreation Area (ODSVRA). Their survey-based approach concluded that such activity contributed $243 million to the local economy. [3] On the other hand, the vehicle use is negative because of public safety, health care and environmental costs. Because of the tradeoff, the vehicular access issue remains sensitive. In this report, I analyze the local economic impact from suspending the vehicular use at the ODSVRA between March and October 2020.[4] I do not comment on the environmental, healthcare, and public safety aspects of the suspension. [5]

On July 11, 2019, California Coastal Commission ("Coastal Commission") held a public hearing about the use of vehicles at the ODSVRA. [6] As a rebuttal to the SMG's

[1] Top Attractions in Oceano page on TripAdvisor (https://www.tripadvisor.com/Attractions-g32814-Activities-Oceano_San_Luis_Obispo_County_California.html)
[2] https://www.sanluisobispo.com/news/local/environment/article243564792.html
[3] The SMG report can be found here.
[4] Sometimes, I assume that the suspension takes place between April and November 2020. This is because the suspension took place on March 26; vehicular access was open for most of the month of March. [5] No one compensated me to write this report. All errors are my own.
[6] The report can be found here.

analysis, I argued that SMG overstated the impact. Over the summer after the hearing, State Parks entered into a consent cease-and-desist order with the Coastal Commission

after a whistleblowing investigation by the Center for Biological Diversity showed that some State Park's actions had harmed snowy plovers.[7] The vehicular access suspended in March 2020. From a research perspective, the suspension offers another tool to analyze the economic impact. **Unlike previous studies, I can now measure the direct impact on the local economy — I do not have to rely on survey results.** Note that an economic impact analysis falls in the realm of social science. It is difficult to prove causality; one can only hope for "probable causation". With that caveat in mind, to understand the impact, I analyze:

- Google Trends data to measure the popularity of vehicular use at the SVRA
- Time spent in parks across the County relative to other nearby counties
- Small business revenue decline in the County relative to nearby counties
- Number of open small businesses in the County relative to nearby counties
- Number of unemployed in the County relative to nearby counties
- Transit Oriented Tax / Transient Occupancy Tax (TOT) from Oceano relative to Avila Beach and Nipomo

Data availability constrains me. For example, sales tax is a measurable proxy of the economic impact. Unfortunately, I do not have access to sales tax at a relative high frequency. As a result, I use other proxies of sales tax like time spent at parks and small business revenue. In the same manner, TOT revenue across all areas of the San Luis Obispo (SLO) metropolitan area is an appropriate measure of the impact. For example, if data were available, I would compare Oceano's TOT revenue to Morro bay or

[7] Technically, the Coast Commission consent cease and desist order did not bar vehicle entry. The order suspended vehicle activity in nesting areas which harassed plovers and caused them to move. The order also requested State Parks to limit their own vehicle use. Last, the order suspended any major grading until October 3rd, 2020.

Cambria's TOT revenue. But, due to data availability, I compare Oceano's TOT revenue

relative to Avila Beach.

Summary of Research Methods

To understand the economic impact, I break up the analysis in two parts. The first part concerns circumstantial evidence. In this part, I build the case documenting that suspension of vehicular use at ODSVRA had a minimal impact on the County's economy. I build the case by analyzing google trends, time spent at the parks, small business revenue, and number of open small businesses. The second part concerns what is closest to the smoking gun evidence. [8]In this part, I seek to answer two questions:

1. What is the impact on the Oceano Beach's TOT revenue due to the vehicular access suspension?
2. How many jobs were lost due to the vehicular access suspension? Consider Oceano Inn located on Pier Avenue, which serves as one of the entrances for the vehicular access. The suspension clearly affects the Inn's revenue and in turn, County's TOT. In this sense, the first question directly measures the suspension's impact. The second question concerns jobs, which is arguably the best proxy of an economic impact. Since an Oceano citizen can work in Paso Robles, I measure the job impact by considering San Luis Obispo metropolitan area.

A naïve analysis measures Oceano's TOT revenue in April 2020 and compares the revenue against April 2019. [9] The analysis attributes the yearly change to the suspension. But such an attribution may not be appropriate. For example, suppose that the difference is negative: Oceano's TOT revenue for April 2020 was lower relative to April 2019. Along with the suspension, the decrease may be because of COVID. To make matters worse, the difference, along with COVID, may also be due to the perilous wildfire season. Last, the difference may be seasonal. Perhaps the year 2020 was hotter

[8] As claimed before, economic impact analysis is social science, and I am constrained by data availability. Therefore, I do not have a true measure of a smoking gun.
[9] Naturally, we can measure other months in the same manner.

(or colder) than 2019, which led to a decrease in the number of visitors. To summarize, other factors in 2020 may also cause a dip in the TOT revenue.

To isolate the suspension's impact, I compare Oceano's yearly change with Avila Beach's yearly change. This type of comparison is ubiquitous in public policy and economics — the method is called a "Difference in Difference" (DiD) approach.[10] The idea is simple. COVID, wildfires and overall temperature trends also affect Avila Beach's TOT revenue. The vehicular access suspension at the ODSVRA, on the other hand, does not affect Avila Beach (at least directly). Then, under reasonable assumptions, by comparing Avila Beach to Oceano, I can isolate the suspension's impact.

Said differently, I compare the outcome variable (like time spent in parks) in the County relative to nearby regions. The key assumption in the DiD approach is the so called "parallel trends" assumption. Implicitly I assume that before the suspension, time spent at parks followed a specific pattern across all the regions. For example, relative to January 2020, if time spent in Monterey in February 2020 increases by 5%, then the time spent in San Luis Obispo will also increase by the same magnitude. Trends are parallel. Then based on the SMG study, since the suspension would disproportionately impact the County relative to neighbors, I would expect a significant decrease in the time spent in parks in the County relative to others. A lack of a significant decrease implies that the suspension did not have a material economic impact.

In contrast, previous studies employed surveys. SMG, for example, asked survey participants of their spending patterns via a survey. To do so, they intercepted visitors at each of the entrances of the Oceano Dunes District parks and asked 16 questions in a post-trip email survey. The survey suffers from measurement error. For example, the

[10] https://en.wikipedia.org/wiki/Difference_in_differences

survey claimed that a visiting party spent approximately $1,300 per visit. However, the survey did not ask where the responders rented their OHVs. It may be that some visitors from Fresno rent from Fresno rather than the County. Incorporating their expenditure in the County's economic impact is misleading. The survey also suffers from selection bias. For example, asking OHV visitors about vehicular access at the ODSVRA selectively focuses on visitors who favor driving on the beach. While the survey included the visitors to the Monarch Grove and campers who did not use ATVs, it did not reach out to pedestrian beach-goers who would otherwise come to the beach for the explicit purpose of swimming, surfing or other non-vehicular activities.

To summarize, since I measure actual outcomes, the DiD approach is direct and does not suffer from the biases plaguing the survey-based approach.

Main Findings

Circumstantial Evidence

1. After analyzing Google Trends data which proxies for search interest, I find that the vehicular access popularity is a small fraction of popularity of Pismo Beach or Avila Beach.
2. After analyzing Google's time use patterns, I find that time spent at County's parks follows a similar pattern as nearby counties during the suspension period 3. After analyzing Womply's small business revenue data, I find that small businesses in the County, actually, fared better than their peers in nearby counties during the suspension period
4. After analyzing Womply's small business openings data, I find that more businesses remained open in the County in April relative to other counties. More businesses remained open in the County relative to Monterey but less than Santa Barbara during the latter half of 2020.

Smoking Gun Evidence

1. After analyzing TOT revenues for Avila Beach, Oceano and Nipomo, using the DiD approach, I do not find any statistical evidence of a negative impact of the suspension.
2. After analyzing the number of unemployed across San Luis Obispo, Salinas, Ventura, and Santa Barbara counties, using the DiD approach, I do not find any statistical evidence of a negative impact of the suspension.

Analysis

Circumstantial Evidence involving Google Trends Data

Modern life revolves around Google. To appreciate the pivotal nature of google, go back to April 2020 when an average person did not understand the COVID symptoms. According to a New York Times article titled "Google Searches Can Help Us Find Emerging COVID-19 Outbreaks", author Seth Stephens-Davidowitz finds that Google searches can find COVID hotspots. For example, searches for "I can't smell" were the highest in New York, New Jersey, Louisiana, and Michigan. Infection rate was also the highest in those four states. [11] Seth's analysis uses Google Trends, which is a public tool that the research community can use to study anonymous and aggregate search data. In the same spirit as the article, I analyze relevant searches to understand the popularity of vehicular use in Oceano.

For any keyword, Google Trends gives a normalized index of the relative use of the word. The trends index has a maximum of 100 where 100 represents the maximum search interest for the keyword. Also, Google Trends can measure search intensity in a

[11] https://www.nytimes.com/2020/04/05/opinion/coronavirus-google-searches.html?auth=login-google

region. In this way, by comparing several keywords germane to the county, one can get a sense of a topic's popularity.

But the use of keywords is more of an art than an exact science. For example, a word like "off-roading" also garners interest in Nevada and Utah. Therefore, adequate analysis has to filter keywords germane to the Central Coast. In that regard, I first compare the keyword "Oceano Dunes SVRA" with "Beach ATV" and "Monarch Butterfly Grove". These three keywords generated major interest in the County and surrounding areas. From a Google search of "Oceano Dunes SVRA", the first item is the link for the State Parks. I used the keyword "Monarch Butterfly Grove" as it is the top attraction in Pismo Beach. I compare those two keywords against the keyword "Beach ATV" which suggests activity. This keyword is more relevant to tourists who may not be familiar with the region.[12]

Figure 1 shows the search intensity of the three keywords since 2003. Two observations are in order. First, the searches follow a seasonal pattern. The search of the keyword "Beach ATV" reaches its peak during summer months, for example. As a result, the economic impact analysis needs to consider the variability across different months. Second, searches for Monarch Butterfly Grove are more popular than searches for Oceano Dunes SVRA (orange line is above the green line most of the time). But search for "Beach ATV" — not Oceano Dunes SVRA — is the most popular (dark blue line is above the other two lines) among the three keywords.

Figure 2 compares the search interest in "Beach ATV" versus keywords "Pismo Beach" and "Avila Beach". The story is different. The search interest in "Beach ATV" is markedly lower than "Pismo Beach" and "Avila Beach". Upon casual inspection, there is no sign that the search interest in either Avila Beach or Pismo Beach decreased in

[12] I also used other keywords; the qualitative results remain identical. Note that the use of search term ATV may have some bias as it is just one type of OHV. Other examples of OHVs are dune buggies and

motorcycles.

2020. It is prudent to compare the search interest relative to the one reported in the SMG study. According to Figure 13 in the SMG impact analysis report, 62% of the participants reported ATV riding as an activity. Figure 2 refutes such high participation.

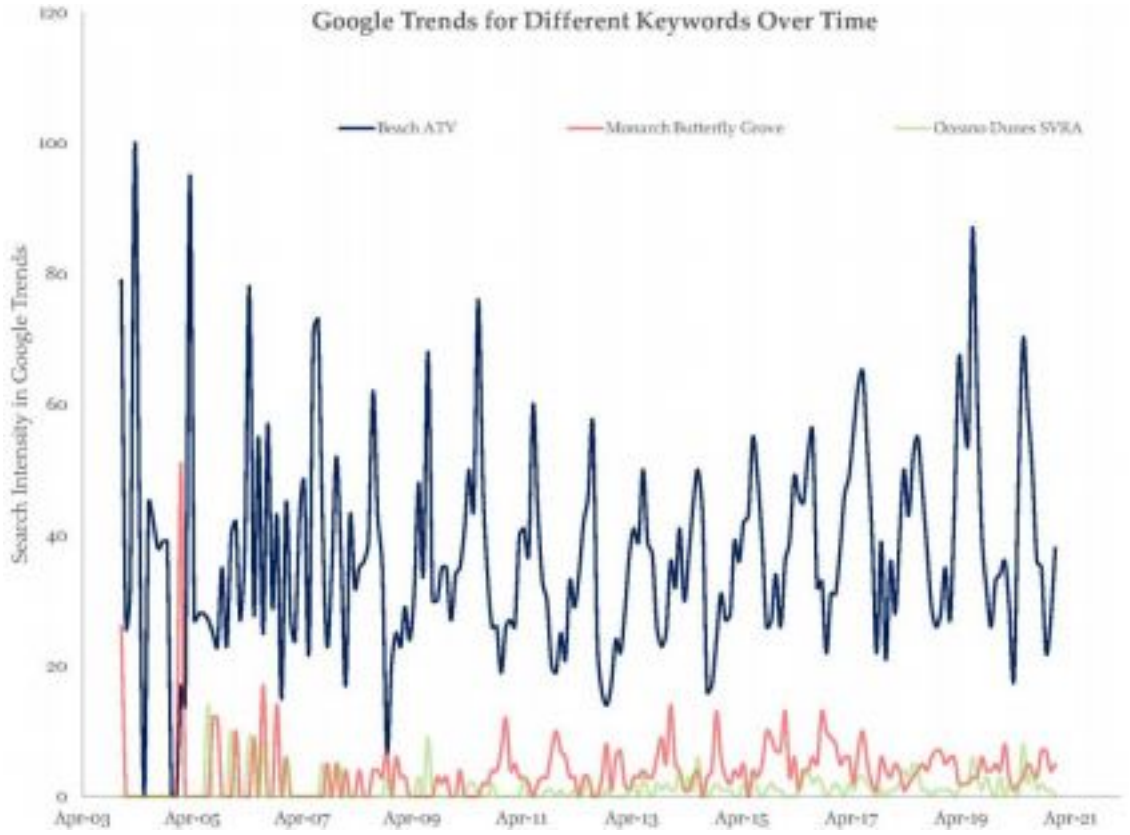


Figure 1: This figure shows the search intensity of different keywords using Google Trends

Note that I cannot claim causality from Figure 2 evidence. Maybe ODSVRA visitors are local or maybe vehicular access attracts repeated visitors who do not use Google. Then, it may be that the Google Trends evidence does not capture the true popularity. In addition, the search intensity is not a proxy of the economic impact. It may be that ODSVRA, even though it is less popular than Avila Beach, has a bigger economic impact relative to Avila Beach. The next two sections address the two issues.

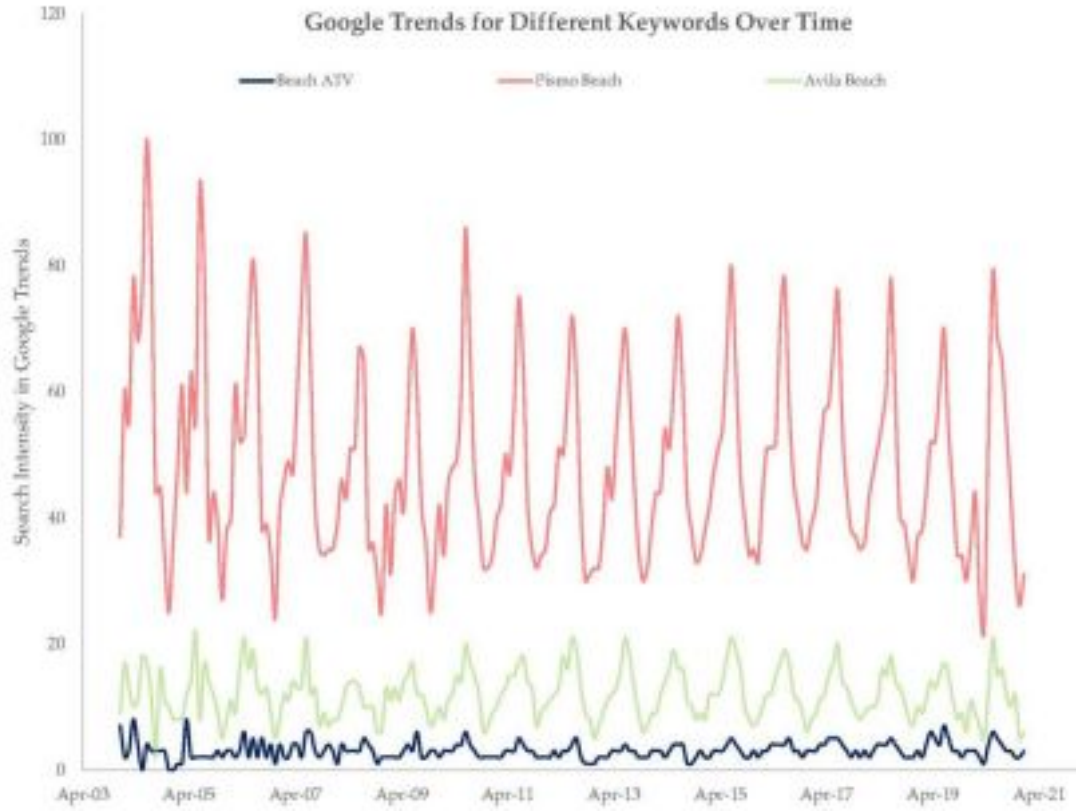


Figure 2: This figure shows the search intensity of different keywords using Google Trends. Note that the search intensity is relative. The Y-axis measuring intensity of "Beach ATV" is different from Y-axis of this figure.

Circumstantial Evidence involving Google's time use data

In response to COVID, Google via Google Mobility Reports constructed measures of daily time spent at parks, retail and recreation, grocery, transit locations, and workplaces. To give a relative sense of the COVID impact, Google normalizes the time relative to January 2020. I use the daily time use data at the GitHub page of Opportunity Insights maintained by professors Raj Chetty and Nathaniel Hendren from Harvard, and Professor John Friedman from Brown (https://github.com/OpportunityInsights/EconomicTracker). [13] Specifically, in Figure 3, I

[13] Simple comparison can also be performed at https://www.tracktherecovery.org/. Note that the data is not available to compare cities like San Luis Obispo versus Pismo Beach.

compare the time spent at parks across three counties: San Luis Obispo, Santa Barbara and Monterey.

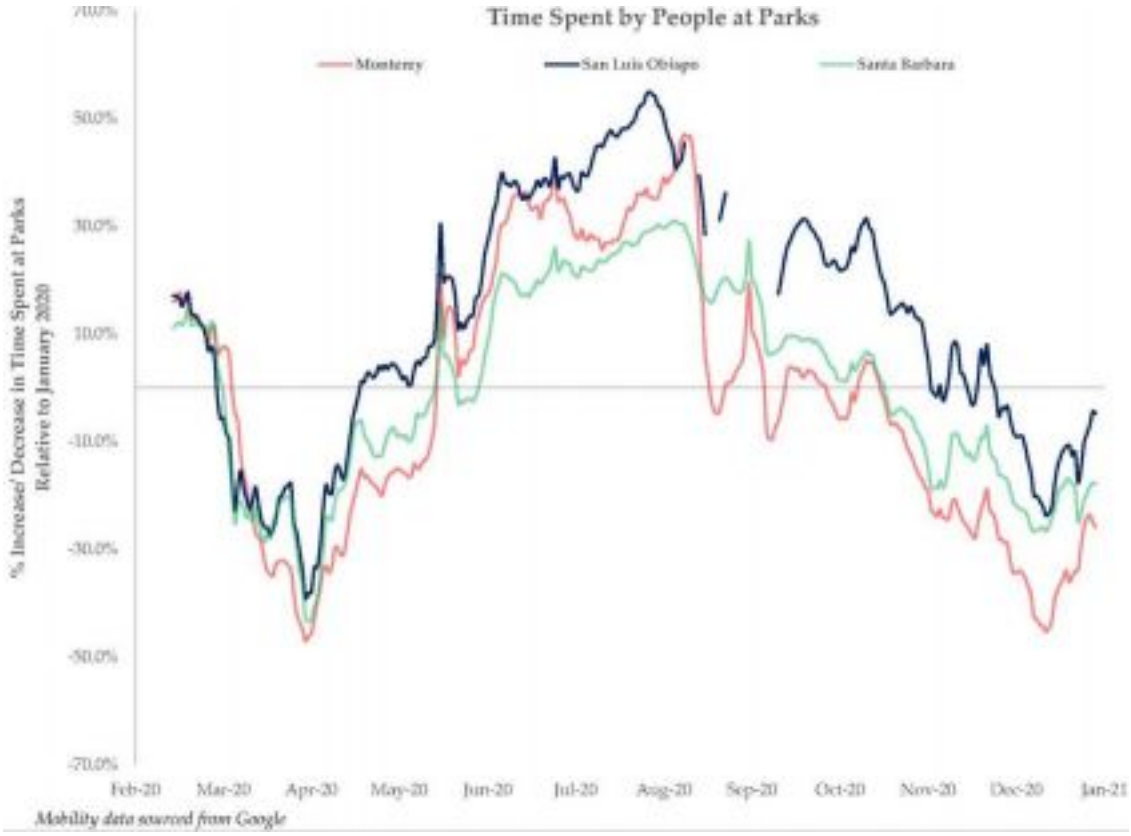


Figure 3: This figure shows the time spent at parks relative to January 2020 across three counties: San Luis Obispo, Monterey, and Santa Barbara

Consider the dark blue line first which highlights San Luis Obispo. Relative to January 2020, the time spent at parks increases in February. But in March as the world comes to gripes with COVID and the resulting nationwide shutdown, time spent at parks experiences a dramatic decline. Relative to January, time spent at parks decreases by over 30%. But, at the beginning of the summer, people venture outside, and the time

spent at parks actually increases by over 50% relative to January.

Now compare San Luis Obispo to Monterey in pink and Santa Barbara in green. The overall pattern of a steep decline in March-April and a sharp rise in summer remains for the neighboring counties. In fact, consistently, more time was spent in the

County parks relative to the neighbors — dark blue line is above the other two lines. This suggests that suspension did not affect the time spent at the parks. Again, Figure 3 evidence is not causal. Since I do not have data on specific location, I cannot, strictly, claim that suspension had a material impact on people trying to spend at parks. But there is overwhelming evidence that even if the suspension had a negative impact on the County's economy, it was not material.

Circumstantial Evidence involving Womply's small business data

Womply is a software company catering to small business needs. For example, with their software, small business managers can solve their accounting, inventory, and banking issues. In response to COVID, it started aggregating data from several credit card processors to provide analytical insights to small businesses and other clients. Similar to GPS tracking by Google, Womply also started providing small business data to the professors mentioned above. I use the same GitHub page[14] to analyze two sets of data: small business revenue and small businesses that remain open. Similar to the mobility data, Womply aggregates the small business data at a county level and the data is relative to January 2020.

In Figure 4, I compare the small business revenue data across three counties: San Luis Obispo, Santa Barbara, and Monterey. Consider the dark blue line representing San Luis Obispo. Due to the COVID shutdown, the revenue decreases by more than

40% between March and April 2020. Such a large drop is unprecedented — it highlights the perilous impact of COVID on the County. Moving forward, the revenue never increases relative to January 2020.

[14] Opportunity Insights GitHub page

Now compare the County to the neighboring Monterey and Santa Barbara counties. All counties experienced a steep decline in the early days of April 2020. It also seems that Monterey county never recovered. San Luis Obispo county fared better relative to the neighbors — dark blue line remains above the green and red lines, mostly. The relative position of the lines implies that San Luis Obispo county was, in fact, least affected.



Figure 4: This plot shows the change in small business revenue relative to January 2020.

Figure 5 shows the time series of the number of open small businesses across the

three counties. According to this data, more San Luis Obispo County businesses remained open in April 2020 relative to the other counties. But, over time, more businesses closed in the County, but the County still fared better than Monterey.

The relative comparison against neighboring counties is pivotal. The revenue in the County may have declined due to the suspension; the revenue may also have declined because Cal Poly went virtual. Although it went virtual, some students did

stay off-campus. Santa Barbara experienced a similar event. University of Santa Barbara and other community colleges also went virtual and it may be that some students decided to remain off-campus.[15]

To summarize, Google Trends data in Figure 2 suggests that vehicular use is not as popular as other keywords. Figure 3 suggests that there was no marked difference in the time spent at parks across the three counties. Figure 4 suggests that San Luis Obispo small businesses, actually fared better than their peers in neighboring counties. [16] Figure 5 suggests that more businesses remained open in the County during April 2020 relative to the neighbors. Taken together, the circumstantial evidence indicates that even if there was a negative impact from the suspension, the impact was not material. I do not find any evidence of an economic impact on the order of $243 million as claimed by SMG. Next, I analyze the smoking gun evidence: Number of unemployed and TOT revenues.

Smoking Gun Evidence involving Labor Force

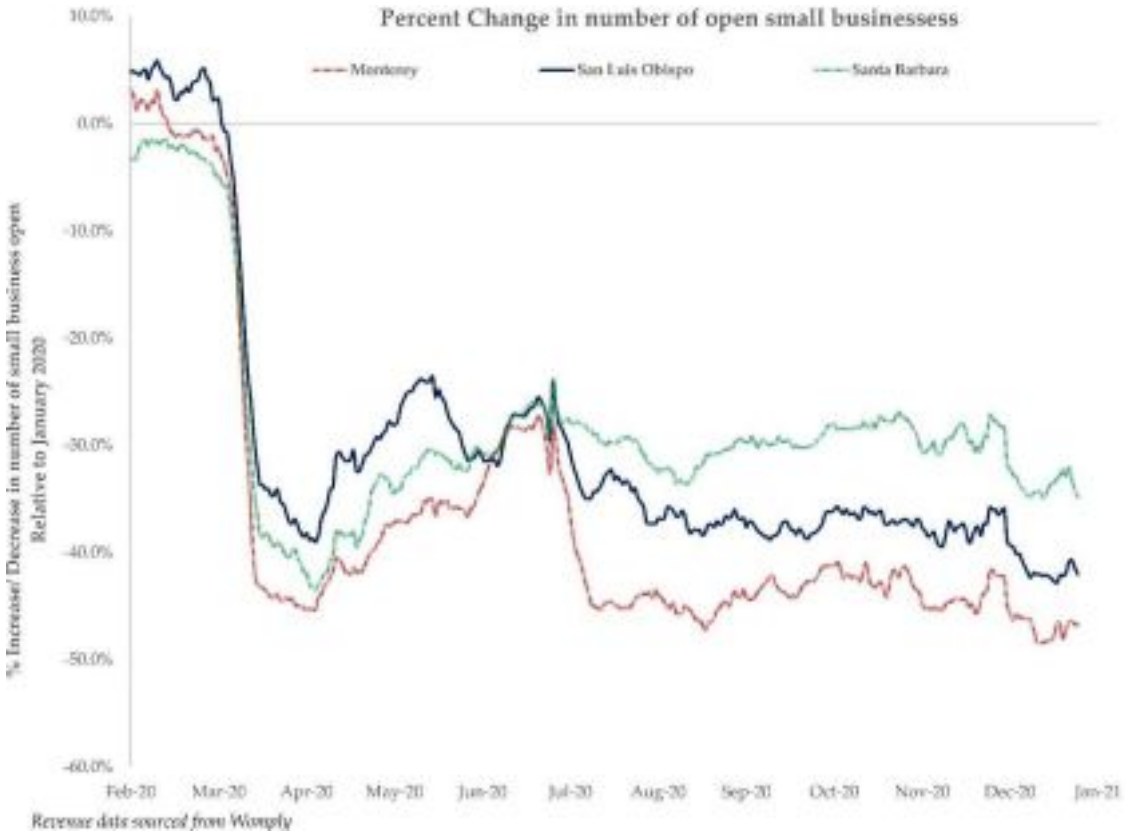
An economic impact analysis is incomplete without a study of jobs. Due to COVID, the US economy lost 22.2 million jobs in March and April 2020 while recovering only 12.4 million jobs. [17] James Carville, who was a strategist for Bill Clinton's successful 1992 presidential bid, once said: "It's the economy, stupid". That statement especially rings true today. In this section, I analyze the time series of the number of unemployed in the County.

[15] It may be that the share of students who remained in off-campus in the County is different than the share of students who remained off-campus in Santa Barbara. The difference in share could result in variable impact. I cannot reject such causation.

[16] The small business revenue is also a proxy of sales tax and I expect that the County sales tax revenues fared better than their neighbors (relative to January 2020).

[17] https://www.reuters.com/article/us-usa-economy/u-s-labor-market-losing-steam-as-covid-19-pandemic rages-idUSKBN28E0IB

Figure 6 shows the time series of the unemployed in the San Luis Obispo Metropolitan Statistical Area (MSA) and compares it to the neighbors. The data is at a monthly frequency and I get the data from the Bureau of Labor Statistics (BLS). I use the number of unemployed labor force at a MSA level rather than at a county level since it is a better measure of the economic impact. [18] For example, if I was to account only for San Luis Obispo County, then I would miss Paso Robles and in turn I would not account for people who live in the County and commute to Paso Robles.



[18] I have also compared the data at a county level; the results do not change qualitatively.

Figure 5: This figure shows the number of open small businesses relative to January 20202

Two observations are in order. First, the number of unemployed is seasonal. Consider the red line representing the number of unemployed in the Salinas MSA. Clearly, there is a yearly pattern. All other MSAs also have a seasonal pattern albeit the pattern is less pronounced. Second, Ventura MSA lost more jobs than other MSAs. San Luis Obispo MSA lost the least number of jobs. The second observation, however, is more nuanced. Ventura MSA also has the highest labor force; San Luis Obispo MSA has the smallest Labor force. Then, it is not clear if San Luis Obispo lost the least number of jobs relative to the labor force. Therefore, one needs to interpret Figure 6 with copious caution.

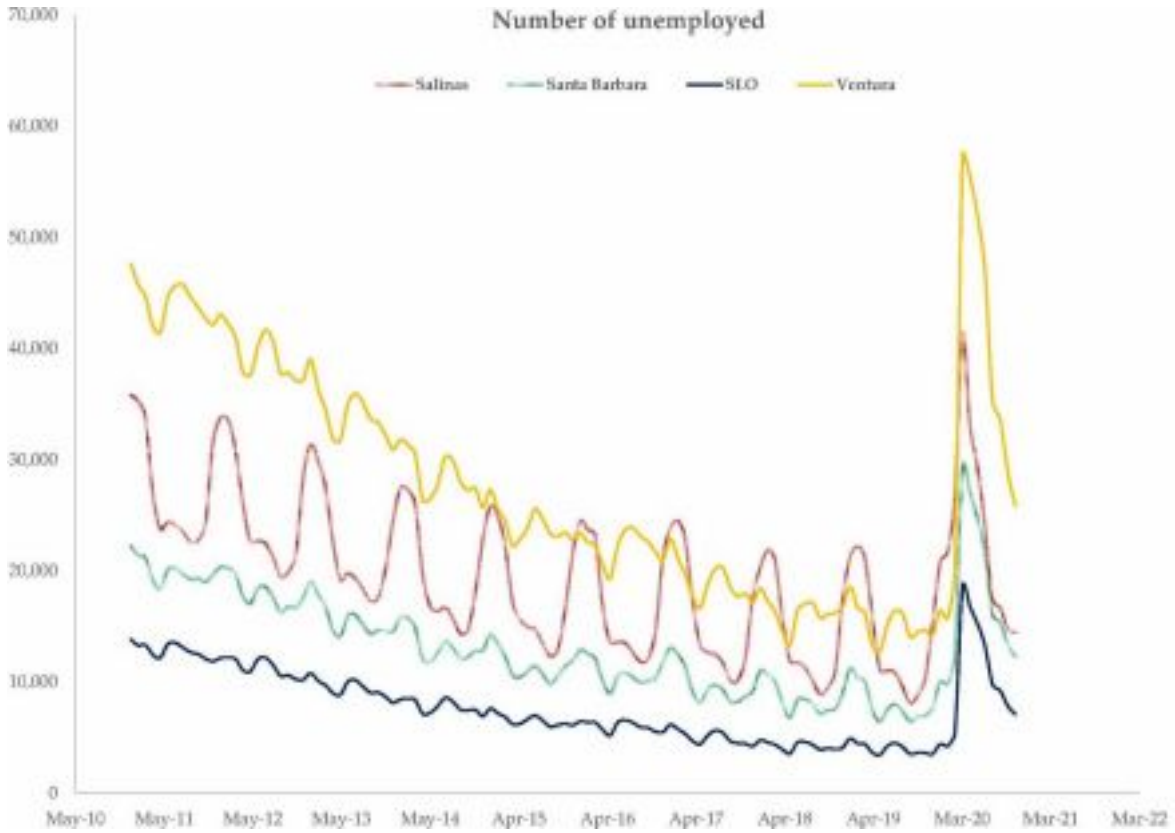


Figure 6: This figure shows the number of unemployed in the San Luis Obispo MSA and its neighbors. The monthly data is from the Bureau of Labor Statistics.

Figure 7 shows the boxplot of the relative monthly changes in the number of unemployed. I analyze relative monthly changes to normalize. To understand the plot, consider SLO (green box). The seven square markers represent the monthly percentage change in the number of unemployed while OHV activity was suspended between March and November 2020. The solid line inside the rectangular box represents the median percentage change: half of the markers are above that line and half are lower. The markers outside the rectangular box are outliers. To the left is the boxplot of the monthly change in the number of unemployed for the past ten years. Note that this period covers the tail end of the past recession. The solid lines in the boxes are different — median monthly change in the number of unemployed is lower when OHV is

suspended relative to when it is open. Across all MSAs, the monthly changes are wider when OHV activity is suspended relative to when OHV activity is open. This is consistent with Figure 6. Immediately after March 2020, the number of unemployed experienced a sharp increase. But in summer, it also experiences a sharp decrease. That is, across all MSAs, the changes in monthly unemployed are more variable.

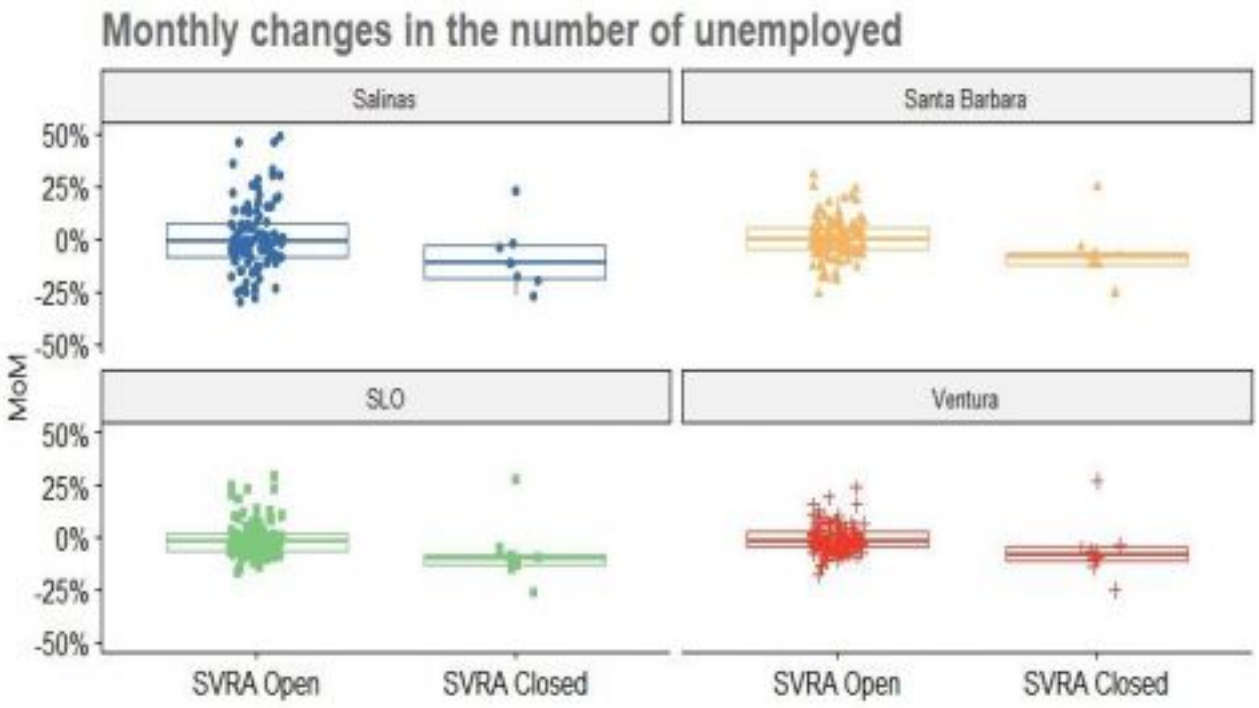


Figure 7: This figure shows a box plot of the monthly changes in the number of unemployed. The OHV activity was suspended in the State Park from April 2020 to November 2020.

As seen from Figure 6, COVID caused a havoc in the US economy; it negatively affected all MSAs. Figure 7 also shows that San Luis Obispo MSA is not adversely affected relative to other counties.

Smoking Gun Evidence involving TOT Revenue

One of the County's revenue drivers is the Transit Occupancy Tax (TOT) program. Another name for the TOT is the "bed tax" or the "hotel tax". Anytime a guest stays at a lodging business, a portion (between 9.50% and 12.5%) of their bill goes toward the TOT program. The portion depends on three components: tax, Tourism Marketing District assessment, and Tourism Business Improvement District assessment. All lodging businesses collect the TOT after registering with the county. The registration requirements are stringent. Regardless of whether an owner rents through a property manager or rents via internet listings, they have to register the business.

Then, by definition, the TOT program is a good proxy of the economic impact created by the Central Coast tourism. In this section, I analyze the impact of the suspension on the TOT revenue.

Univariate Analysis

Figure 8 shows the monthly TOT revenue since 2017. I get the data from the County's tourism website. I only analyze Avila Beach, Nipomo and Oceano due to data availability. The monthly data is available from January 2017 and ends in August 2020. Two observations are in order. First, the TOT revenues follow a seasonal pattern. As expected, the revenues are higher in summer and lower at other times.

Second, the TOT revenue of Avila Beach is approximately 70 times more than Nipomo's TOT Revenue and is approximately eight times more than Oceano's TOT revenue. This nuance is important. Even if the suspension negatively affected the County's economy, it is reasonable to assume that the impact is heterogenous. Due to proximity, Oceano and Nipomo are hurt more than Avila Beach. Then, the overall impact on the County is unclear since Avila Beach brings considerably more revenue to the County relative to Oceano and Nipomo.[19]

The blue column chart in Figure 9 shows Avila Beach's TOT revenue in 2019 for the months from March to August. The seasonal pattern is evident. The TOT revenues are higher in summer relative to spring months. The bottom chart in red shows yearly change in the TOT revenue. In April 2020, Avila Beach's TOT revenue was 70% lower than TOT revenue in 2019.

[19] I use the economic definition of the County rather that the political definition.

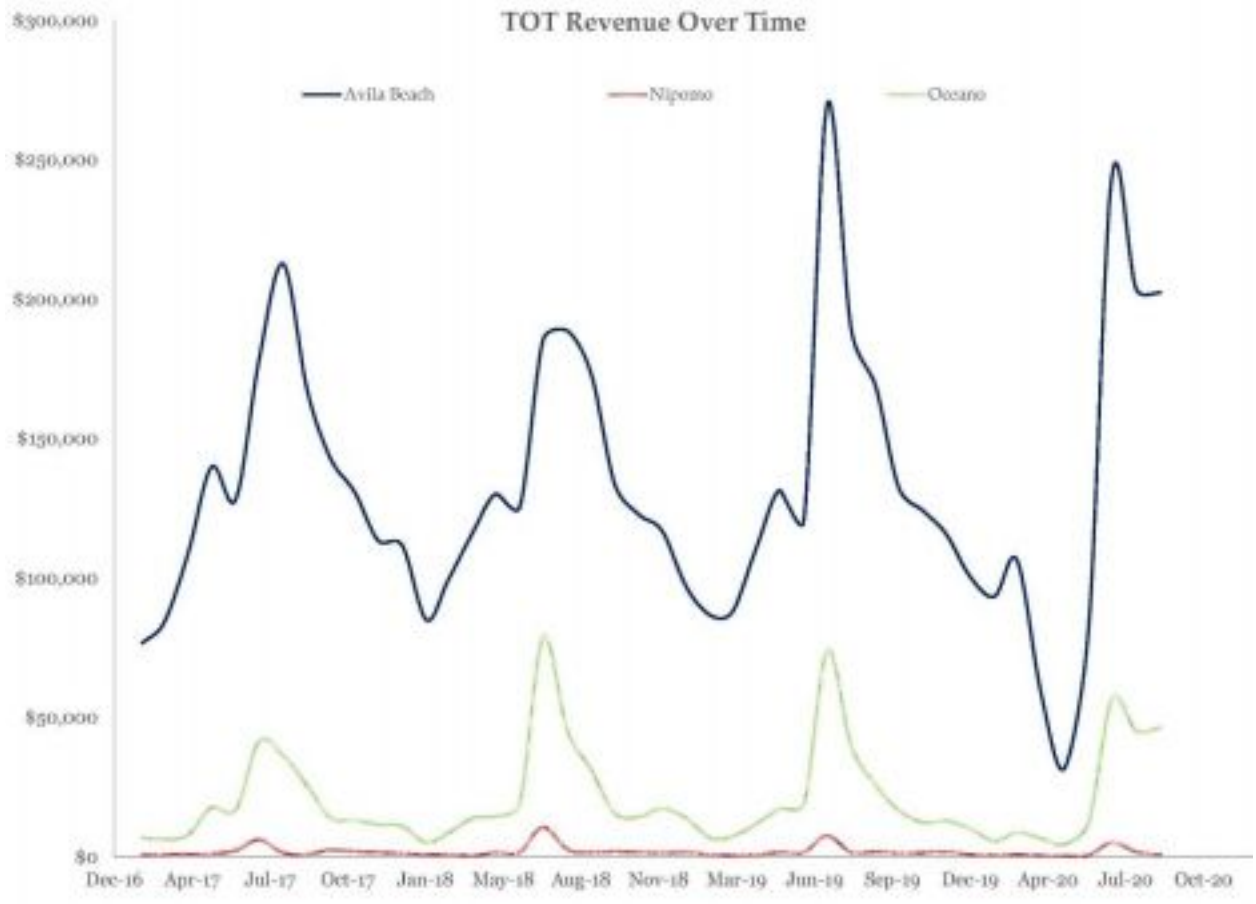


Figure 8: This figure shows the TOT revenue across Avila Beach, Nipomo and Oceano. The data is the publicly available at the tourism website.

But the plot also shows that the TOT revenues, actually, increased in summer 2020. Much to my surprise, in August 2020, Avila Beach's TOT revenue was 19% higher than 2019. Overall, Avila Beach's average revenue was only 6% lower in 2020 relative to 2019.

Figure 10 shows the 2019 TOT revenues for Nipomo and compares them against 2020. Unfortunately, Nipomo is drastically affected as it does not experience the summer rebound. But note the magnitude of the negative impact. At its highest, Nipomo only brought in $8,000 in TOT revenue.

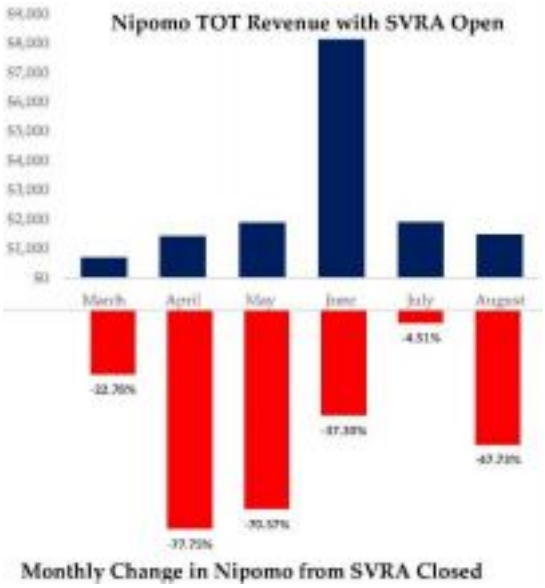


Figure 9: The blue chart shows Avila Beach's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended.



Figure 10: The blue chart shows Nipomo's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended.

Figure 11 shows the TOT revenues for Oceano and compares them against 2020. The story is similar to Avila Beach — not Nipomo. Relative to 2019, Oceano's TOT revenues decrease by more than 70% in April but unexpectedly they rebound by 69% in August. Overall, average monthly TOT revenue in 2020 was $23 K relative to $21 K in 2019 — Oceano's revenue, actually, increased.

It is worthwhile to compare the actual increase in Oceano's TOT revenue against SMG's predictions. According to the SMG study, 62% of the survey participants indicated that they would not visit the County if OHV activity were not allowed. While this may be the case for OHV visitors, it is certainly not the case for the pedestrian and equestrian visitors. Not only are the visitors coming to Oceano but also, they are staying

at the Oceano hotels generating more revenue for the County.

Multivariate Analysis — A DiD approach

In this section, I formally apply the DiD approach. As a result, this section is more technical than before.

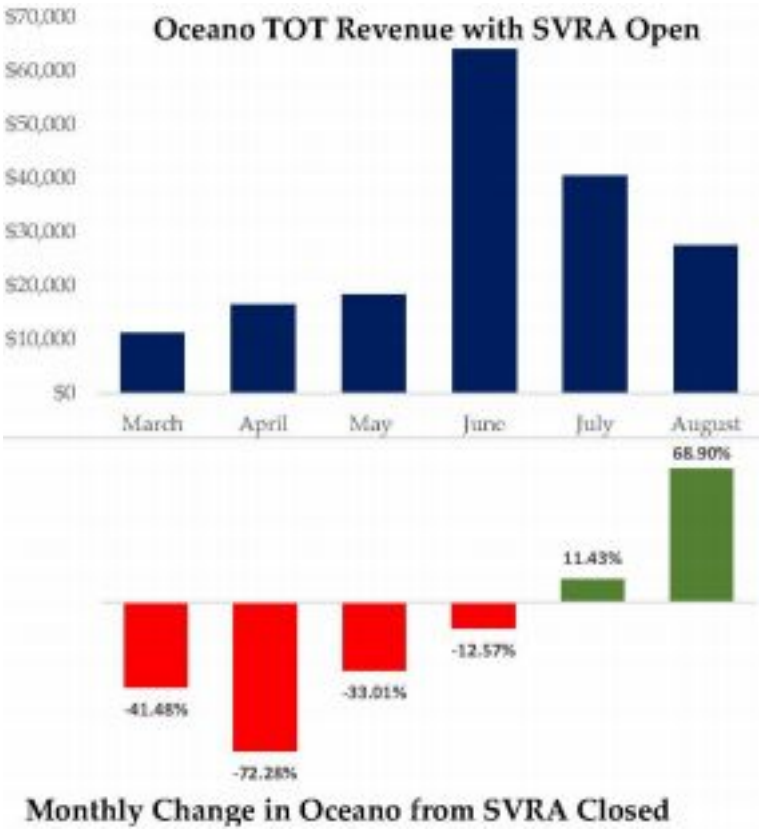


Figure 11: The blue chart shows Oceano's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended.

In the previous subsection, I analyzed the time series. I did so to explore the data through time. But this analysis is incomplete. For example, it could be that tourists changed their behavior: instead of staying in the more expensive Avila Beach, they are

staying in Oceano. The univariate analysis in the previous section is incomplete. In this subsection, I use a DiD approach to answer the question: What is the impact on the Oceano Beach's TOT revenue due to suspension of vehicular activity?

With a DiD approach, I distinguish the impact of the suspension on Oceano relative to Avila Beach and Nipomo. Mathematically, I estimate that the TOT revenue for any Area is:

$$TOTRevenue_{im} = \alpha + \beta \times Month_m + \gamma \times Area_i + \theta \times Suspension_{Period} + \delta \times (Oceano \times Suspension_{Period}) + \varepsilon$$

The equation states that the TOT revenue in month *m* at Area *i* depends on

1. Some common level represented by a constant α
2. monthly seasonal variation represented by independent variable $Month_m$ 3. Geographic variation represented by independent variable $Area_i$ 4. Suspension represented by a dummy variable for the period between April 2020 and November 2020
5. Suspension impact on Oceano represented by the interaction term Oceano × $Suspension_{Period}$. This is the main variable of interest. If the suspension impact on Oceano is statistically significant, then the coefficient δ is statistically different from zero. If the impact is negative, then δ is negative otherwise it is positive. For example, according to the SMG result, δ is negative.

With the equation, I can control for several alternative theories. For example, the monthly fixed effect $Month_m$ controls the monthly variation in the TOT revenues. The Area fixed effect $Area_i$ controls for the geographic variation. $Area_i$ variable implies that Avila Beach is different than Oceano which is different than Nipomo. Since the suspension period coincides with COVID shutdown, the COVID related negative effect is controlled by the Suspension period fixed effect. The interaction term at the end

represents the economic impact from the suspension of OHV activity.

Table 1: This table shows the regression determinants of the TOT Revenues of Avila Beach, Oceano and Nipomo. The analysis consists of four models. The first model considers the Area; the second model considers the monthly variation; the third model considers the suspension period, and fourth model considers all of them together.

	Dependent variable:			
	TOT Revenue			
	(Area)	(Month)	(Suspension Period)	(All)
Nipomo	−130,566.500***	−130,566.500***	(6,381.767)	(4,857.707)
Oceano	−111,371.500***	−112,217.500***	(6,381.767)	(5,137.289)
February	3,534.472	3,534.472	(26,313.010)	(9,301.801)
March	5,653.928	7,579.720	(26,313.010)	(9,430.108)
April	10,249.300	12,175.090	(26,313.010)	(9,430.108)
May	13,415.390	15,341.190	(26,313.010)	(9,430.108)
June	65,690.670**	67,616.460***	(26,313.010)	(9,430.108)
July	49,924.110*	51,849.910***	(26,313.010)	(9,430.108)

August	39,726.020	41,651.810***	(26,313.010)	(9,430.108)
September	20,453.360	20,453.360**	(28,421.300)	(10,047.090)

October 16,206.500 16,206.500 (28,421.300) (10,047.090)

November 12,877.140 12,877.140 (28,421.300) (10,047.090)

December 7,854.084 7,854.084 (28,421.300) (10,047.090)

Suspension Period

(16,536.190) (7,426.467)

Oceano 6,203.528

Interaction (12,258.780)

4,605.680 −9,771.008

Constant 132,421.800*** 30,754.270 51,147.790*** 111,682.300*** (4,512.590) (18,606.110)

(6,106.392) (7,172.030)

Observations 132 132 132 132 R2 0.791 0.098 0.001 0.891

Adjusted R^2 0.788 0.016 -0.007 0.877

Table 1 shows the results of the regression. Consider the first column labeled Area. This column shows how TOT revenue differs by geography. The results are

relative to Avila Beach. The regression shows that Nipomo's average revenues are $130 K below the revenues of Avila Beach. Similarly, Oceano's revenues are $111 K below Avila Beach. The three stars indicate that the differences are statistically significant.

Now consider the second column labeled month. This column shows how TOT revenues vary by month — the model accounts for seasonal variation. The results are relative to January. Again, the results are as expected. Other than June and July — summer months — average revenue in other months is not significantly different than January. Adding Area to the model in column 4 makes the results even starker — TOT

revenue is higher in the summer months (in a statistical sense); TOT revenue in other months is similar to January.

Now consider the third column labeled Suspension period. This column shows the average TOT revenue from April 2020 to November 2020 relative to other time periods. Note that this is also the period of the COVID shutdown. The estimated θ of $4,605 is not statistically significant; the standard error is $16,536. The implication is stark — the suspension period, taken by itself, did not impact the TOT revenue. That said, this third model is inadequate. The R^2 — a measure of the model fit — is below 1%.

Each of the three models by themselves are inadequate. The fourth column incorporates all the models. After adding other factors, revenues for Oceano and Nipomo remain below Avila Beach as expected. The revenues for summer months are also statistically higher than other months. After adding factors, coefficient for the suspension period is negative as expected. Last, to isolate the impact of the suspension, the coefficient for the Oceano interaction term, δ, is of interest. Contrary to the SMG study, δ is actually positive, although it is not statistically different from zero. Taken together, the regression clearly shows that the suspension did not have a material impact on the county's economy.

Conclusion

In this report, I analyze the economic impact from the suspension of the OHV activity at the ODSVRA. Unlike previous studies using surveys, I measure actual outcome variables like time spent at parks, small business revenues, and TOT revenues. Using a well understood and popular DiD approach, I find that vehicle suspension had no material impact on the County's economy.

Re: The Oceano Dunes PWP And CCC's Reaction

Kevin Beauchamp <kevin.beauchamp@kw.com>

Tue 2/9/2021 12:00 AM

To: Martin Akel <akelassoc@earthlink.net>
Cc: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; Myra Akel <myra.akel@gmail.com>

Martin,

I belive I know the answer to this, but is the biggest driver for this project / expansion, California State Parks? I know the OHV groups want it, but they would not have the pull to go up against the Coastal Commission.

Thanks,



Kevin Beauchamp
Tel 805.343.9345
Cell 805.264.5822
Kevin.Beauchamp@KW.com
www.4NipomoHomes.com
Mobile App: http://app.kw.com/KW1P8PLLF

On Feb 8, 2021, at 3:14 PM, Martin Akel <akelassoc@earthlink.net> wrote:

To: Members Of The California Coastal Commission ...

We've reviewed State Parks' latest Public Works Plan/EIR for the Oceano Dunes and Oso Flaco Lake. Without question, their planners have ignored the directions of the Coastal Commission as well as the input of citizens who live in communities bordering the Dunes.

For years we've asked that State Parks address the undeniable problems brought on by OHVs on the dunes ...

• The destruction of the dunes and vegetation.

• The ruin of habitats for endangered species and the loss of wildlife.

• The air/dust pollution that carries into the lungs of men, women and children living nearby.

• The local streets laden with sand.

• The ongoing OHV buzzsaw of revving engine noise … a roar that carries miles beyond the park itself.

• The never-ending hordes of OHVs that act as if they own the beaches and the rest of us be damned.

• The ATVs, pickup trucks and RVs that, regardless of park rangers, have a complete disregard for speed restrictions … endangering families seeking to have safe, peaceful outings … putting their lives at risk as they walk from the dunes to the ocean.

• The vehicle exhaust that families must breathe as vehicles pass by.

• The gun violence that has occurred when off-roaders gather and "party" (sometimes at non-permitted events).

• The on-site OHV accidents and personal injuries/deaths that have become a way of life for aggressive, reckless riders.

What has been the response spelled out in the PWP?

• Turning the pristine Oso Flaco location into a **Disneyland** for thrill-seeking riders on ATVs, dune buggies, dirt bikes, pickup trucks … all with destructive, heavy-duty tires and deep, open treads.

• Even greater acreage for OHVs to roam and tear up the landscape.

• Opening the door to an even greater negative impact on native vegetation, wildlife habitats and the species themselves.

• No limits on the quantity, types or sizes of OHVs.

• The introduction of on-site facilities to make riders' activities more electrifying and convenient than ever … a "kids' track", "pro tracks", cabins, concessions … thereby attracting even larger throngs of vehicles more frequently.

• A "Special Event" arena (e.g., the potential return of the out-of-control "Huckfest" … *"the world's largest offroad jumping competition*").

• No real plans to significantly reduce air/dust pollution … just vague statements implying that somehow it will work out down the road.

• No new scientific studies or EIRs regarding the impact of the new Oso Flaco sites and its activities on the air/dust pollution that the winds will drive into local communities.

• Suggestions for yet another entrance via the Phillips 66 property, which will put thousands of vehicles and enormous RVs on the one-lane, coastal Highway 1 and feeder roads, bringing far more air pollution, noise and traffic jams even closer to local citizens and businesses.

The PWP states that State Parks' new plan is bringing *"an acceptable balance between motorized recreation and protection of natural resources."* That's an outrageously misleading statement. Where does the "balance" truly address the needs of the environment and local communities? State Parks' scale of "balance" is brazenly weighted in favor of "motorized recreation." The environment and local communities are a minor or non-existing part of the plan's equation!

The bottom line - the PWP planners are tantalizing and rewarding those who bring havoc to the dunes, all in the name of revenue generated for State Parks.

All of the above is why we welcome your recent statement/press release - "California Coastal Commission to Consider New Activities at Oceano Dunes." You obviously recognize that State Parks has disdain for your stated views and directions, and that you will not allow them to continue on their destructive path.

We wholeheartedly endorse your staff's recommendation to protect the Oceano Dunes and Oso Flaco Lake from the incursion of OHVs, and to *"reimagine the Park operating in a more environmentally sustainable way."* We look forward to your March 18th hearing.

Respectfully,
Martin & Myra Akel

MARTIN & MYRA AKEL

968 Jacqueline Place, Nipomo CA 93444

T: 805.219.0295; akelassoc@earthlink.net

Oceano Dunes EIR and Coastal Commission response

Naomi Goodman <nlgoodman@hotmail.com>

Mon 2/8/2021 11:45 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

The Environmental Impact Report recommends "upgrades" for the Oceano Dunes OHV area that would be a disaster for the fragile dune ecology, protected and endangered species, and the health of area residents exposed to airborne particles from the eroded dunes. Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The current level of OHV usage has led to deaths of endangered snowy plovers, caused a plume of respirable particulates at levels exceeding health criteria in nearby communities, and has degraded the non-OHV visitor experience due to noise impacts, trash, and lack of access to large areas of the beach. Expanding that with new recreational OHV trails will make this situation worse. A 300-person campground in the vicinity of Oso Flaco lake will destroy an important migratory bird habitat through increased visitation, noise impacts, and pollution from smoke and dust.

As an out-of-area visitor and birder, I value the Oso Flaco and Nipomo Dunes area as one of the last untouched areas of coastal marsh and dune ecosystem in Central California. It should not be damaged to provide motorized recreation to those who prefer to destroy the environment rather than preserve it. I made a statement to this effect at the Coastal Commission meeting in Half Moon Bay on November 14, 2019. Please put a stop to this ill-considered and damaging plan.

Naomi Goodman
Menlo Park, CA

Protect Oceano Dunes!

Wendy Lynn Wright <wtxpainter@yahoo.com>

Mon 2/8/2021 11:03 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now, PLEASE!

Thank you for all you do for the environment,
W. Wright
Sierra Club Santa Lucia Chapter

Protect Oceano Dunes!

Alice Griselle <agriselle@gmail.com>

Mon 2/8/2021 8:10 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please protect this unique and fragile ecosystem per the recommendations of the Santa Lucia Sierra Club.

Protect Oceano Dunes!

Dr Stephen Hansen <hansens2@pacbell.net>

Mon 2/8/2021 8:03 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

It's a health issue in so many ways!
I favor the staff report--hope you do, too--

Stephen L. Hansen, M.D.
805-544-2737

Protect Oceano Dunes

Nancy Welts <nwelts@yahoo.com>

Mon 2/8/2021 7:49 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

I support local organizations such as Santa Lucia Chapter of the Sierra Club and the League of Women Voters of San Luis Obispo County, which are calling on the Coastal Commission to take action now.

Thank you,

Nancy Welts

San Luis Obispo resident since 1988

CALIFORNIA COASTAL COMMISSION
FRIDAY, FEBRUARY 12, 2021
AGENDA ITEM 4: GENERAL PUBLIC COMMENT

Dear Commissioners, Executive Director Ainsworth, and Staff.

I registered to speak during General Public Comment on February 12, 2021 but now cannot be available that day or other meeting days. Instead, I'd like to submit my statement here in lieu of oral comment.

As you prepare for the March 18, 2021 meeting about the future of Oceano Dunes, I'd like to plant five ***"Duty and Responsibility"*** phrases on your radar screens:

1. **DUTY AND RESPONSIBILITY TO CONFORM:**

   "All state agencies shall carry out their duties and responsibilities to be in conformity with this division." Pub. Res. Code (Coastal Act) Sec. 30402. (Emphasis added)

   The first and foremost duty and responsibility of State Parks is to shape and place State Park units in a manner that is compatible with both State Parks' overall mission and the total regulatory environment that exists and governs where the units are located.

   In the Coastal Zone, State Parks (and any of its divisions) must carry out their duties and responsibilities in conformity with the Coastal Act and applicable Local Coastal Plans (LCPs).

   At present, and for decades, conformity does not exist and has not existed. Classification does not create or constitute conformance.

2. **DUTY AND RESPONSIBILITY TO REGULATE:**

   While the Coastal Commission does not classify State Park units, it does have the ultimate regulatory duty and responsibility to determine whether operation and management of a State Park unit located in the Coastal Zone conforms to and complies with requirements of the Coastal Act and applicable Local Coastal Plans (LCPs).

   The duty and responsibility (and jurisdiction) for permitting and regulating all aspects of development within the Coastal Zone and requiring compliance with Coastal Act and LCP policies, provisions, standards, and

requirements are vested in and rest exclusively with the Coastal Commission and/or governments with certified LCPs. State Parks and the OHMVR Division have conceded for decades that they are subject to the regulatory and permitting jurisdiction of the Coastal Commission.

The Coastal Commission's duty and responsibility to regulate in the Coastal Zone also includes the authority and jurisdiction to condition, limit, restrict, and, where necessary, to deny.

3. **DUTY AND RESPONSIBILITY TO RE-IMAGINE:**

The Coastal Commission has broadly, repeatedly, and yes firmly invited State Parks and its OHMVR Division to re-imagine a park that can exist and thrive in a manner that complies with Coastal Act and LCP policies, provisions, standards, and requirements. This is what "the project" under consideration in any proposed PWP should truly be.

If they are to truly fulfill their legal duty and responsibility to conform to Coastal Act, State Parks and its OHMVR Division have the duty and responsibility to accept and comply with this invitation. Thus far, including through the draft PWP and draft DEIR (and the HCP process as well), they have failed to do so.

4. **DUTY AND RESPONSIBILITY TO RE-CLASSIFY**:

The State Parks and Recreation Commission has the responsibility and authority to classify State Park units and approve initial general development plans. It also has the authority to, when necessary, amend and revise plans, and reclassify units. Again, classifying is not the same as regulating, and a classification should not stand or continue if a unit as classified cannot comply with applicable regulatory requirements.

As part of seriously undertaking to fulfill their duty and responsibility to re-imagine a park that can fully conforms with Coastal Act and LCP policies, provisions, standards, and requirements, State Parks and its OHMVR Division must be willing to examine an option for the future that thus far has been improperly identified as non-viable and thus not yet examined in a good faith manner. Namely, the alternative of unit reclassification.

Government Code provisions allowing for the existence and classification of State Park units also contemplate the potential for reclassification. See e.g., Pub. Res. Code Secs. 5002.1 and 5002.2. Representatives of State Parks should be prepared to describe and explain what a reclassification process would look like and why it has not been considered.

5. **DUTY AND RESPONSIBILITY TO REPAIR AND RESTORE**:

Dune restoration has been a key component (and requirement) of the core Coastal Development Permit (CDP 4-82-300) since 1982.

Restoration is a core value of the Coastal Act, the Endangered Species Act, and the Stipulated Order of Abatement.

Restoration and conservation of lands are two of several valid bases for the expenditure of OHV Trust Fund monies. Pub. Res. Code Sec. 5090.61(b)(1).

It would be totally in keeping with applicable statutory provisions for OHV Trust Fund money to be spent on restoration and conservation activities and measures during any period of OHV phase-out. Examples would be expenditures relating to habitat protection and implementation of mitigation measures required to comply with the APCD's Stipulated Order of Abatement.

I'm sincerely appreciative of your willingness to consider my comments.

Michael Normoyle
Nipomo, CA
m.normoyle@mcnlegal.com

Protect Oceano Dunes!

Susannah Roberts <str-manga@hotmail.com>

Mon 2/8/2021 6:12 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Sirs:

For the past 38 years, the Oceano Dunes State Vehicular Recreation Area has been out of compliance with its Coastal Development Permit, which required designation of a permanent entrance and staging area within 18 months of the SVRA receiving its permit in 1982. Over the course of those 38 years and two separate access studies, no less destructive means of OHV access to the ESHA has been found. Just as there is no non-destructive OHV activity possible in ESHA, there is no non-destructive OHV access to ESHA possible. Moreover, for 32 years the SVRA has failed to conform with San Luis Obispo County's Local Coastal Program, which requires designation of 580 acres of County-owned land within the SVRA as a buffer between the riding area and the Dunes Preserve. "Interim" vehicle limits were set 19 years ago and have never been adjusted—part of the failure to conduct a carrying capacity study to determine how many vehicles the dunes ecosystem can withstand without long-term damage.

For 17 years, the California Department of Parks and Recreation (DPR) has refused to heed the advice of the scientific subcommittee of its Technical Review Team to study the potential benefits of year-round closure of the SVRA's snowy plover nesting area to vehicle traffic. For a decade and counting, the DPR has disputed the findings of a peer-reviewed study commissioned by the SLO County Air Pollution Control District which found that dust plumes that blow off the dunes and create hazardous pollution levels for down-wind residents---victims of the worst air quality in the country---are largely the result of off-road vehicle activity. Over the last 18 months, the DPR has missed four promised deadlines for delivery of a completed Public Works Plan to the Commission's Executive Director. Through the summer and fall of 2020, the DPR engaged in significant grading activity at the ODSVRA without obtaining or seeking a Coastal Development Permit for this intensified use, in direct violation of the Coastal Act. I believe that the clock has run out. The Coastal Commission should take action to implement all 15 of the permit amendments and a 5-year phase out of OHV activity in the ODSVRA, as proposed at the commission's July 2019 meeting. The Commission should also inform State Parks that, as a condition of approval for their Public Works Plan, they will be required to update their general development plan for the ODSVRA to recognize and implement the buffer status of the La Grande Tract in acknowledgment of that designation in the County's Local Coastal Plan. The Commission's required inclusion of a 5-year phase out of OHV activity in the Public Works Plan must include a specific time frame, with specific benchmarks and dates demonstrating how and when OHV activity will be scaled back and finally cease, with a date certain for an end point, and an understanding that this end point will not be changed, whether or not DPR has successfully met all benchmarks in the program timeline.

Here are a number of significant points:

Endangered & threatened wildlife:

- Oceano Dunes is an important nesting location for the threatened western snowy plover & the endangered California least tern. There is overwhelming evidence that off-highway vehicles (OHVs) at Oceano Dunes directly harm these birds.
- Native vegetation has died off as a result of erosion and degradation caused by vehicles.

Public health & safety:

- With vehicles present, the beaches are no longer pedestrian-friendly and pedestrians are put in harm's way.
- Communities near Oceano Dunes are exposed to toxic air quality and OHV activity is part of this problem. Habitat degradation and erosion from vehicles contributes to increased dust emissions and sand movement, which creates poor air quality.

Social justice:

- Recreational vehicles make the beach difficult and dangerous to access for local communities. Vehicle use prevents safe access to a clean beach for all people.
- Oceano Dunes holds cultural significance to the Chumash peoples and has for thousands of years. Degradation of the dunes is harming culturally important lands.

Habitat damage & degradation:

- Coastal erosion is caused by the off-highway vehicles (OHVs)
- The high levels of human traffic are accompanied by high levels of littering on the beach
- Recreational vehicles are responsible for depositing oil and gas on the beach
- Vehicles cross Arroyo Grande Creek while it flows. This is harming the creek habitat which is an important habitat, especially for fish spawning.

Covid-19 precautions:

- The Oceano Dunes SVRA was closed at the beginning of the covid-19 pandemic due to high cases. Covid-19 cases are rising again and SLO County has fallen back into the Widespread (Purple) tier, yet the beach remains open to vehicles
- Oceano Dunes SVRA attracts predominantly non-local users, which leaves the local community exposed to visitors from all over the state
- The beach is an important outdoor space for local communities to utilize during the pandemic. It provides space for locals (predominantly pedestrian usage) to enjoy the outdoors in a socially distanced manner.

I urge the Coastal Commission to amend the coastal permit for the park and begin phasing out off-road vehicular activity in the Oceano Dunes.

Sincerely,

Susannah Roberts
Nipomo, CA

Protect Oceano Dunes!

Shawn Gleason <shawn@greenvaletree.com>

Mon 2/8/2021 3:04 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please stop all the vehicle traffic in the dunes. I've seen people burying their trash in the sand and tons of people drinking and driving. The dunes are a natural wonder that should be explored on foot. Thank you for your time.

Shawn

Sent from my iPhone

Protect Oceano Dunes!

Lindsey Bolton <lindsey@allgoodproducts.com>

Mon 2/8/2021 6:59 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you in advance for your consideration and action regarding this important issue.

Kind Regards,

Lindsey

--

Lindsey Bolton
Community Rockstar
All Good
PO Box 203, Morro Bay, CA 93443
P (805) 528-4000
D:(805) 603-1374
F (805) 528-4667
www.allgoodproducts.com

Protect Oceano Dunes!

alex b <lxboley@gmail.com>

Mon 2/8/2021 4:46 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for your consideration,

Alexis Boley

Protect Oceano Dunes!

Karen Ames <imaginariumfun@gmail.com>

Mon 2/8/2021 4:32 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Karen Ames

Sent from my iPad

Protect Oceano Dunes!

Jackie Pope <jackiepope@gmail.com>

Mon 2/8/2021 3:23 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Jackie Pope

Keep Oceano Dunes As They ARe

Sicy Simoes <sicysimoes@sbcglobal.net>

Mon 2/8/2021 1:44 AM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>
Cc: Crowfoot, Wade@CNRA <Wade.Crowfoot@resources.ca.gov>; Miggins, Sarah@Parks <Sarah.Miggins@parks.ca.gov>

3 attachments (2 MB)

IMG_4353.jpg; IMG_4354.jpg; IMG_4355.jpg;

Dear Mr. Kahn, Mr. Crowfoot and Ms. Miggins,

I am writing to you to **voice my opposition** to the Coastal Commission proposed changes to Oceano Dunes and OHV Park.

Could you please confirm if your staff has spent any significant time at Oceano Dunes? If so, it would be difficult to accept that their observations and data support thee recommendations. Does the Coastal Commission comprise itself with diverse enough resources? or representation? It would important to know how the various recreation users of the are are represented in its future.

Based on the recent posting on the California Coastal Commission website:

1) Moving camping between Pier and Grand is an unsafe recommendation due tide conditions at Oceano Dunes. You would have campsites over taken by water on a regular bases. This appears to be a hastily assembled recommendation designed to placate those that are unaware of the physical conditions of the area. It is a recommendation destined to fail. Please leave it as it is, with room to camp safely in the dunes.

2) The central coast provides miles of hiking, biking, horse trails and walking.Pismo Beach, California Trails & Trail Maps | TrailLink It only provide the 8 mile stretch for OHV use. 8 miles of California Coastline ONLY for OHV use. One that has been in place and shrinking since 1980. Please consider maintaining accessible recreation use for other types of California recreation seekers and businesses that support this type of recreation. Please continue to represent varied recreation options.

Pismo Beach, California Trails & Trail Maps | TrailLink

Explore the best trails in Pismo Beach, California on TrailLink. With more than 6 Pismo Beach trails covering 17...

3) In the last several years, Pismo Beach has gone through a tremendous transformation. For that matter, much of California Coastline has been over developed with hotels, restaurants. Establishments that promote environments of sedentary use and experience. The OHV park has provided generations of gatherings, barbecues, story telling, active OHV and access for all ages, shapes, levels of activity. My mother in law and father in law, my father, my husband and I, my children are all part of this wonderful community going back 50 years. **Connection and community.** Please do not close this chapter on the California Coastline. Much has already been commercialized. See attached photos.

Please, I encourage you and your staff to come visit this stretch of beach and experience it for several days before a decision is made to change this small stretch of coastline.

Thank you for your consideration.

Sincerely,

Sicy Simoes
Part-time resident in Grover Beach since 2005
Part of Oceano Dunes community since 1994

Protect Oceano Dunes!

Carol Maxwell <carol@carolmaxwellmft.com>

Mon 2/8/2021 1:02 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

> Dear Chairmain Padilla and Commissioners,
>
> I am writing out of concern for the future of the Oceano Dunes.
>
> In order to protect the Dunes environment, I hope you will support and implement your staff's recommendations. Please amend the State Park's Coastal Development plan as your staff have recommended and begin to phase out of Off Road Vehicle (ORV) activity in this sensitive coastal area.
>
> It is alarming that the State Parks Draft Management Plan ignores reasonable environmental conservation recommendations, instead proposing development completely counter to reasonable, environmentally conscious, management.
>
> The State Park has so much to offer without ORV activity. Additionally, it was hopeful to read that a recent study found that closure of the dunes area for ORV activity during the pandemic did not negatively impact the local economy. This study suggests that the community could easily make a viable and healthy transition to a State Park that could offer car camping, walking, fishing, swimming, birding, hiking and other activities that promote health and well being, without deleterious environmental consequences and unreasonable personal risk.

> I thank you for your thoughtful consideration of this important issue.
>
> Carol Maxwell
> 234 Almond St.
> San Luis Obispo, CA 93405

Sent from my iPad

Supporting the Oceano Dunes Closure

B Miller <bernardlmiller@gmail.com>

Mon 2/8/2021 12:18 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>
Cc: B Miller <bernardlmiller@gmail.com>

I am responding in OPPOSITION to the recent draft proposal to re-open access to the dunes via a new route near Oso Flaco. As a permanent resident of Oceano and growing up in the area since the 60's I have watched with sadness the continuing degradation of this entire region. Adding yet another access point will further destroy our area. I find it curious that the mandate of the parks:

"To provide for the health, inspiration and education of the people of **California** by helping to preserve the **state's** extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation."

has been subverted to siding with those only bent on destruction of the area. The non-resident terrorist's minority have no vested interest in the long-range health, inspiration nor education of the people of this state let alone those who actually live in this area. Their only interest is in supporting an abhorrent lifestyle subsidized by large conglomerate automotive and off-road equipment manufacturers. The dunes and beaches of the area have been plundered for more than 100 years. From Plowing for clams on an industrial scale to the installation of sewer/sewage drain outs to the more pernicious OHV use. In one of my first acts as a citizen I voted in the late 70's to approve a statewide measure to close all automotive access to the beaches. This was done virtually immediately in the city of Pismo Beach to good affect. With vehicular pressure removed, people were allowed to interface more directly with nature. The closing of Oso Flaco took more time and legal engagement to enforce the will of the voters and the people of the area; the result was a further easing of human pressure on the fragile ecosystem. The remaining access points have turned into launch pads for the cyclone of insanity, ecological degradation, kingdom building and overall destruction of our vital limited coastal resource. The State Parks administration of the beach is part of the problem. They are more concerned with pulling in sold out campaign revenue every possible day and increasing enforcement revenue. As they are the only true enforcement agency in the OHV space they are completely overwhelmed, outnumbered, and outgunned. Additional law enforcement is required on a weekly if not daily basis officer morale is consistently low. Turnover in the ranger pool is one of the highest in the state. Most rangers leave this post as soon as senior brass will allow. Area emergency health service providers are forced to buy equipment such as 4-wheel drive ambulances and even life flight helicopters are needed to rescue those injured by this off-road frenzy. Parks are complicit in environmental degradation and are seen intentionally destroying Plover nests and nesting areas. None of the millions collected are returned to The 5 Cities area as we are considered somehow a substandard group of Californians. A recent non-partisan economic review has shown that the claimed loss in revenue is specious. The 5 Cities area is left with the mess, the damaged infrastructure, unfunded emergency services, fouled air, noise pollution, and increased trash and miscreant behavior by the minority terrorist visitors. Meanwhile Sacramento; yes, Sacramento is happy to take the cream of the revenue stream in taxes, law enforcement citations. Only a handful of "Vendors" are allowed to provide services and collect direct revenue. The Central San Joaquin Valley has built a minority arsenal of terrorist off roaders, and OHV dealership supporters who bankroll the OHV riders group to procure "Friends of the Dunes" websites to sway public opinion to maintain their grip over this fragile resource. The Central Valley Terrorists use intimidation tactics to pressure lawmakers and local residents into collective silence by shutting down the 101 freeway and to weaponize their cause by illegal and un-permitted public demonstrations on our main roads. No other beach in the United States allows wanton destruction of a beach. From top fuel nitro burning Sand Dragsters, "Hucked" off road vehicles, gasoline poured on the sand and set afire to leap through are not allowed anywhere save a war zone. This terrorism must be stopped and closing the dunes is the only way to do it.

Cordially,
Bernard Miller - Resident Oceano California 93445



Virus-free. www.avg.com

Protect Oceano Dunes!

berny miller <mffour@gmail.com>

Sun 2/7/2021 11:34 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Honorable Coastal Commission Members,

CLOSE THE OCEANO DUNES TO OFF-ROAD VEHICLES PERMANENTLY

As a homeowner in Oceano, my life is impacted by the hoards of off-road vehicle owners that trash my local environment. The large vehicles (and year after year they are bigger) that are brought to drive out on the beach are catastrophic to the dunes. The off-road groups bring alcohol and guns and that combination has become an overwhelming issue to our local law enforcement and medical community. 5 people were shot at an unpermitted event out on the dunes in 2019. OHV accidents resulting in death are on the rise due to the ever-increasing numbers of OHV vehicles.

The continued degradation of our sensitive Oceano dunes coast is extreme! The off-road folks bring oil, feces, smoke, trash and MORE TRASH! After a busy weekend, the ocean is full of garbage left by these people.

The off-road minority is a cohesive group and they have been advertising through their clubs to get as many people as they can to promote the continuation of OHV activity. False flag names such as “Save the Dunes” and “Friends of the Dunes” are nothing more than facades for groups that promote the destruction of the Oceano dunes ecosystem. The off-roaders try to say that they need MORE space on the dunes. It will not matter if they are given the entire dunes coast to Vandenberg! The problem is not lack of area; it is the off-roaders themselves. Given more space, they will just bring MORE OHVs. The huge trailers full of ATV’s now driven out on the dunes by the off-road business people (who think they OWN the dunes) will just increase. Where does it stop? Who stands for the Dunes ecosystem?

Please consider the Coastal Commission mandate and how the new plan for OHV activity does not remotely comply. This is environmental injustice. State Parks is not adhering to guidelines set to protect this sensitive environment, in fact it appears with this latest plan, that they intend to continue the destruction. Please set the clock on phase out of OHV activity now, today.

PLEASE, CLOSE THE DUNES TO OFF ROAD VEHICLES FOREVER BEFORE IT’S TOO LATE.

The dunes are a coastal treasure that should be preserved for future generations of Californians. Please act now to protect our beautiful coast.

Thank You,

Terese Miller

Virus-free. www.avg.com

Protect Oceano Dunes!

Steve Thompson <captainashore@hotmail.com>

Sun 2/7/2021 10:26 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Off-road vehicles are not compatible with the protection of a fragile coastal dunes complex, threatened species, and environmentally sensitive habitat area. For those reasons and more, off-road vehicles must be phased out at Oceano Dunes in favor of traditional, low-impact beach recreational use.

Sent from Outlook

Protect Oceano Dunes!

cd33333@aol.com <cd33333@aol.com>

Sun 2/7/2021 8:40 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please do everything you can to protect Oceano Dunes. The area is fragile, and humans leave a terrible imprint. Humans will ruin it, than say to themselves, "Gee, I didn't think it was that bad."\

Valerie Gemanis
Los Osos CA

Protect Oceano Dunes!

William Harris <wfharris@charter.net>

Sun 2/7/2021 8:29 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners

Please add my name to the list for closure of the Oceano Dunes to off-road use. I favor closure over limited use because the State Parks has proven for years that they favor money over environmentally acceptable management. Plus the latest study by Cal Poly has proven that local communities don't benefit financially from off-roaders. The latest environmental outrage for me was when rangers were caught moving Snowy Plovers nests. There are other parks in the State where off-road vehicles can operate.

Leave the Dunes open to hikers and horses but please protect the health of the people who live behind the Dunes from off-roaders.

Bill Harris

Protect the Oceano Dunes!

Gail Roberts <gatroberts@hotmail.com>

Sun 2/7/2021 8:07 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect the Oceano Dunes!

Dear Chairman Padilla and Commissioners,

I live in Nipomo and am lucky to be close by the unique seascape of the Oceano Dunes and Oso Flaco. We walk on the boardwalk and the beach whenever we can. Unfortunately there are large stretches of the beach that are inaccessible to pedestrians thanks to near-constant traffic. The beach is not a highway. Motor vehicles have no place on the sand. They are a menace to the native wildlife, and to everyone hoping to enjoy the ocean in peace. Vehicles in the SVRA are also obviously a menace to the drivers themselves, given the constant pace of accidents and injuries in that area.

I am aware that off-road supporters are a vocal and determined lot. They often argue that theirs is a family-friendly form of recreation, sanctioned by the years. But there are many other activities that once were common- smoking, driving without seatbelts, littering - that are now not acceptable. Driving on a fragile marine landscape should be another.

Families can easily enjoy our beaches without destroying them. And while there were claims that out-of-town SVRA patrons brought outsized economic benefits to this area, that contention has recently been debunked. Tourism is certainly important to the local economy. But pristine beaches seem likely to draw more visitors than noisy, dirty vehicular areas.

Oso Flaco in particular is a treasure for wildlife, and the boardwalk is ideal for walkers. But the area echoes to the roar of nearby vehicles on the beach. Developing Oso Flaco to facilitate yet more vehicular mayhem is a terrible plan that should be quashed immediately.

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase-out of OHV activity.

Thank you for your support.

Gail Roberts, Nipomo CA

Protect Oceano Dunes!

Katie Stewart <kastewart827@gmail.com>

Sun 2/7/2021 8:01 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, protect Snowy Plover habitat, preserve Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year (now stretching to 18 months) to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano cannot walk on the beach safely nor comfortably, and they are watching the precious coastal dunes complex, their defense against rising sea levels, being eroded away. The plume of health-destroying particulate matter from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an unnecessary and easily amended environmental injustice. As you know, California State Parks is not fixing the problem, they are blatantly ignoring your directive to create a plan to protect the Environmentally Sensitive Habitat Area. Please take whatever action is required to implement and enforce such a plan.

Thank you for all you do to protect and preserve our environment,

Katie Stewart

Arroyo Grande, CA

Re-imagining the Dunes

Nico Aebischer <nicoaeb@icloud.com>

Sun 2/7/2021 7:53 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

February 7th, 2021

Costal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060

Dear Commissioners,

I understand that you are asking SLO county residents if they have any ideas to improve the beach at Océano dunes and Oso Flaco. I am a 7th grade student at Laguna Middle School and Resident of SLO county. I, like countless others, enjoy going to the beach to relax and get away from home. To improve the beach, I would like to see it as a place that is open to everyone that respects it. In order for this change to happen, I think our community should:

1. Be more ecological. I don't think that giant pickup trucks that are bad for the environment should be able to rule the beach. They push others who want to enjoy the beach away.
2. I am also concerned about climate change and would like to phase out fossil fuels.
3. I would also like to see less trash on the beach. When I go to the beach, I often find shards of glass from beer bottles, plastic bags, and surprisingly, used diapers. It is truly disturbing to see the mark some people have on beach, and I would like to see some change.
4. Respect the wildlife. I think there should be more protected areas for the snowy plovers who nest in the dunes. If people can't drive on the beach, it will vastly improve the population and well-being of the wildlife.
5. Provide easy access to the beach, especially to the largely Latinx community that lives nearby. This community should have the right to access the beach without having to worry about getting run over by off-road vehicles.

I trust that as leaders of this county you will make a decision that preserves the great beaches we are so fortunate to have.
Thank you!
Nico Aebischer

P.S. If someone is driving on the beach and crashes, I wouldn't be surprised if they sued the city. :)

Protect Oceano Dunes!

Nora Lewis <noracnm@verizon.net>

Sun 2/7/2021 7:52 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I live near the Dunes and recognize the need for its protection. As a health care provider I also recognize the yearly severe accidents from reckless ATV users who do not follow the law when it comes to environmental protection or basic ATV safety laws.

Nora Lewis, RN, CNM

February 7, 2021

Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060

Dear Coastal Commissioners,

I understand that you are seeking public comment to re-imagine the use of the Oceano Dunes and Oso Flaco from San Luis Obispo County residents. I am an elementary school teacher at CL Smith Elementary School in San Luis Obispo and have taught at Oceano Elementary School. I am also a mother of 2 children, a 15 year-old and 12 year-old.

I am writing to emphasize the importance of re-imagining this space for three reasons. The first is to protect habitat and minimize carbon production to slow climate change. The second is to provide access to nature and recreation for our community and for visitors. The third is to advocate for the underserved primarily latinx Oceano neighborhood who should have the right to access their local beach without fearing being threatened or hit by off-road vehicles.

It is exciting to think of the possibilities of this beautiful place. The following ideas would attract tourists who appreciate and want to preserve this unique habitat. I also feel that these changes will be an economic benefit to the South County as a more diverse population feels safe on the beach in Oceano. Local campgrounds, hotels, restaurants, and other local tourist industry will thrive even more.

Here is my vision:

1. As we work to eliminate fossil fuel combustion engines, ELIMINATE driving on the beach.
2. Expand all of the free-to-the-public activities that people, animals, and plants naturally do at the beach!! It's the beach! And when there aren't scary, dangerous trucks zooming all over, it is a beautiful place where we all thrive! People of all economic, political, religious, and racial/ethnic backgrounds have a place at the beach. Our family goes to Pismo Beach almost every weekend and I love the diversity of people and activities there! Expanding the walkers, babies, children, surfers, runners, athletes, kite flyers, and people seeking rest and nature would be a huge and relatively cheap improvement over the polluting dangerous vehicles that exclude all of the rest of us. I resent that I pay taxes to pay for destructive vehicles that deny access to the people who live in the Oceano community and in our County.
3. To promote healthy lifestyles, construct a bike path/handicap accessible path that connects Pismo Pier to Oso Flaco. It could connect to campgrounds and have inroads and bike-parking stations at Grand Avenue to promote local businesses in that area. Families in Nipomo and Guadalupe could bike to Pismo for day trips...and vice-versa!

4. Expand the Monarch Butterfly over-wintering site and ensure that there is more protected habitat for butterflies up and down the coast. As you likely know, western monarch butterflies are nearing extinction. The numbers this year are disturbingly low.
5. Protect more snowy plover habitat.
6. Have beach volleyball, sand soccer, ultimate frisbee, and other sport camps and tournaments on the beach through South County Parks and Rec programs.
7. Have a designated area for unleashed dogs to play. (Our border collie loves to play frisbee.)

Thank you for seeking our input on this very important matter. I know that I speak for many people who don't have the time or energy to write to you. I also speak for the endangered species and open space.

I hope that our voices are heard and that our State Parks makes a decision that puts us on the right side of history.

Thank you!

Elizabeth Aebischer

Please Protect Oceano Dunes! (from Nipomo resident)

Steve Mullany <sm49903@gmail.com>

Sun 2/7/2021 6:21 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,
Steve Mullany

Nipomo , CA
Sierra Club Santa Lucia Chapter

Please Protect the Oceano Dunes

Emily <emilyrosten@gmail.com>

Sun 2/7/2021 6:06 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairmain Padilla and Commissioners,

I am writing out of concern for the future of the Oceano Dunes.

In order to protect the Dunes environment, I hope you will support and implement your staff's recommendations. Please amend the State Park's Coastal Development plan as your staff have recommended and begin to phase out of Off Road Vehicle (ORV) activity in this sensitive coastal area.

It is appalling and alarming that the State Parks Draft Management Plan ignores reasonable environmental conservation recommendations, instead proposing development completely counter to reasonable, environmentally conscious, management.

The State Park has so much to offer without ORV activity. Additionally, in support of the community's economic viability regardless of OVR use, it was exciting to read that a recent study found that closure of the dunes area for ORV activity during the pandemic did not negatively impact the local economy. This study suggests that the community could easily make a viable and healthy transition to a State Park that could offer car camping, walking, fishing, swimming, birding, hiking and other activities that promote health and well being, without deleterious environmental consequences and unreasonable personal risk.

I thank you for your thoughtful consideration of this issue and other issues that come before the commission.

Sincerely,

Emily Rosten
1146 Marsh Street
San Luis Obispo, California 93405



Protect Oceano Dunes!

Helen Powell <helenpowell823@gmail.com>

Sun 2/7/2021 4:39 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Helen Powell
Sierra Club Santa Lucia Chapter Member

Proposal re development of Oceano Dunes Vehicular Park

Norma Wightman <norma.wightman@gmail.com>

Sun 2/7/2021 4:38 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Proposal re development of Oso Flaco

Please register my extreme disapproval at the state park's proposal for the development of the area around Oso Flaco.

What happened to the vision of California State Dept of Parks and Recreation's 20 year master plan that called the Oceano dunes, "The most urgently needed landscape preservation project in the State of California." Or the U.S. Dept of the Interior Fish and Wildlife Service calling it "the most unique and fragile ecosystem in the State of California. "(*The Inventory of California,*1980)?

The proposal of 200 RV sites, up to 100 tent camping sites and OHV access via a south entrance to the park will bring hundreds to thousands of people to Oso Flaco for off-roading and camping, bringing with it traffic jams of vehicles and people creating excessive noise disturbance, water pollution, additional dust, habitat alteration, attraction of predators, and introduction of invasive species.

The proposed project will destroy and degrade habitat for snowy plovers, least terns, and several rare plant species. The special-status plant species that could be impacted include Marsh Sandwort (Arenaria paludicola), Gambel's Water Cress (Nasturtium gambelli), and La Graciosa Thistle (Cirsium scariosum ssp. loncholepis),

The project would potentially cause least terns to abandon use of Oso Flaco Lake for foraging and may drive many, many other bird and wildlife species away from the lake and the surrounding area. It would completely alter what is now one of the top birding spots in San Luis Obispo County.

Please remember the mission of California State Park regarding **preservation and protection** of valued natural and cultural resources:
Mission:
*To provide for the health, inspiration and education of the people of **California** by helping to preserve the **state's extraordinary biological diversity, protecting its most valued natural and cultural resources**, and creating opportunities for high-quality outdoor recreation.*

Norma Wightman
norma.wightman@gmail.com
2905 Coral Ave.
Morro Bay, CA 93442-3144
805-772-7859

Protect Oceano Dunes!

Sharron Miller <sharronleemiller@sbcglobal.net>

Sun 2/7/2021 3:39 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and commissioners,

Off road vehicles have contributed to several deaths in the Oceano dunes recreational area. This is just one reason of many to discontinue this dangerous use. Although, probably the most important. In fact, I am surprised that off road vehicles were not banned after the first death. I'm not sure how a "state park" can justify their current policies. It can't just be about the revenue, or tourism. Even without the off road use, revenue would continue with camping and vehicle day use.

I respectfully ask you all to please stop the use of off road vehicles at Ocean Dunes.

Sincerely,

Sharron Miller

Protect Oceano Dunes!

Ross Heckmann <rosss.heckmann@gmail.com>

Sun 2/7/2021 5:55 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thanks,

Ross S. Heckmann
1214 Valencia Way
Arcadia, CA 91006-2406
626-256-4664
Fax no.: (626) 701-5022
E-mail: RossS.Heckmann@gmail.com

Protect Oceano Dunes!

Susan Quinones <susanqrn@gmail.com>

Sun 2/7/2021 2:57 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I live on the central coast. I enjoy walking along the beach without having to watch out for vehicles on the beach. I lived within a mile of the Oceano dunes and saw the amount of silt that was in the air, covering my furniture inside and out and coating my lungs. The dunes and the species that live among them need to be protected. It's time to change policies so that future generations can enjoy the dunes too.
Sincerely,
Susan Quinones
Avila Beach, CA

--
"Compassion is the radicalism of our time."

Subject: Protect Oceano Dunes!

A Looney <ayanalooney@gmail.com>

Sun 2/7/2021 2:56 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019.

Next, began the phase-out of ALL off-highway vehicle (OHV) activity including car camping on the beach.

OHV activity in particular causes ongoing and severe environmental degradation. The longer an area is used the more damage multiplies.

Phasing out OHV activity will still mean everyone will have the right to recreate in our beautiful wild spaces, but strips the right of everyone to destroy our beaches and endangered species.

By phasing out OHV activity, our parks would continue to offer unique experiences such as walking and swimming, horseback riding, birding, fishing, and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment.

Sincerely,
~Ayana Looney
5800 Hamilton Street #189
Sacramento, CA 95842

Protect Oceano Dunes!

Matt Morrison <mattmog63@gmail.com>

Sun 2/7/2021 2:48 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Matt Morrison

Protect the Oceano Dunes!

Ron Roberts <rgroberts2000@hotmail.com>

Sun 2/7/2021 2:06 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Sirs:

For the past 38 years, the Oceano Dunes State Vehicular Recreation Area has been out of compliance with its Coastal Development Permit, which required designation of a permanent entrance and staging area within 18 months of the SVRA receiving its permit in 1982. Over the course of those 38 years and two separate access studies, no less destructive means of OHV access to the ESHA has been found. Just as there is no non-destructive OHV activity possible in ESHA, there is no non-destructive OHV access to ESHA possible. Moreover, for 32 years the SVRA has failed to conform with San Luis Obispo County's Local Coastal Program, which requires designation of 580 acres of County-owned land within the SVRA as a buffer between the riding area and the Dunes Preserve. "Interim" vehicle limits were set 19 years ago and have never been adjusted—part of the failure to conduct a carrying capacity study to determine how many vehicles the dunes ecosystem can withstand without long-term damage.

For 17 years, the California Department of Parks and Recreation (DPR) has refused to heed the advice of the scientific subcommittee of its Technical Review Team to study the potential benefits of year-round closure of the SVRA's snowy plover nesting area to vehicle traffic. For a decade and counting, the DPR has disputed the findings of a peer-reviewed study commissioned by the SLO County Air Pollution Control District which found that dust plumes that blow off the dunes and create hazardous pollution levels for down-wind residents---victims of the worst air quality in the country---are largely the result of off-road vehicle activity. Over the last 18 months, the DPR has missed four promised deadlines for delivery of a completed Public Works Plan to the Commission's Executive Director. Through the summer and fall of 2020, the DPR engaged in significant grading activity at the ODSVRA without obtaining or seeking a Coastal Development Permit for this intensified use, in direct violation of the Coastal Act. I believe that the clock has run out. The Coastal Commission should take action to implement all 15 of the permit amendments and a 5-year phase out of OHV activity in the ODSVRA, as proposed at the commission's July 2019 meeting. The Commission should also inform State Parks that, as a condition of approval for their Public Works Plan, they will be required to update their general development plan for the ODSVRA to recognize and implement the buffer status of the La Grande Tract in acknowledgment of that designation in the County's Local Coastal Plan. The Commission's required inclusion of a 5-year phase out of OHV activity in the Public Works Plan must include a specific time frame, with specific benchmarks and dates demonstrating how and when OHV activity will be scaled back and finally cease, with a date certain for an end point, and an understanding that this end point will not be changed, whether or not DPR has successfully met all benchmarks in the program timeline.

Here are a number of significant points:

Endangered & threatened wildlife:

- Oceano Dunes is an important nesting location for the threatened western snowy plover & the endangered California least tern. There is overwhelming evidence that off-highway vehicles (OHVs) at Oceano Dunes directly harm these birds.
- Native vegetation has died off as a result of erosion and degradation caused by vehicles.

Public health & safety:

- With vehicles present, the beaches are no longer pedestrian-friendly and pedestrians are put in harm's way.

- Communities near Oceano Dunes are exposed to toxic air quality and OHV activity is part of this problem. Habitat degradation and erosion from vehicles contributes to increased dust emissions and sand movement, which creates poor air quality.

Social justice:

- Recreational vehicles make the beach difficult and dangerous to access for local communities. Vehicle use prevents safe access to a clean beach for all people.
- Oceano Dunes holds cultural significance to the Chumash peoples and has for thousands of years. Degradation of the dunes is harming culturally important lands.

Habitat damage & degradation:

- Coastal erosion is caused by the off-highway vehicles (OHVs)
- The high levels of human traffic are accompanied by high levels of littering on the beach
- Recreational vehicles are responsible for depositing oil and gas on the beach
- Vehicles cross Arroyo Grande Creek while it flows. This is harming the creek habitat which is an important habitat, especially for fish spawning.

Covid-19 precautions:

- The Oceano Dunes SVRA was closed at the beginning of the covid-19 pandemic due to high cases. Covid-19 cases are rising again and SLO County has fallen back into the Widespread (Purple) tier, yet the beach remains open to vehicles
- Oceano Dunes SVRA attracts predominantly non-local users, which leaves the local community exposed to visitors from all over the state
- The beach is an important outdoor space for local communities to utilize during the pandemic. It provides space for locals (predominantly pedestrian usage) to enjoy the outdoors in a socially distanced manner.

I urge the Coastal Commission to amend the coastal permit for the park and begin phasing out off-road vehicular activity in the Oceano Dunes.

Sincerely,

Ron Roberts

Nipomo, California

Protect Oceano Dunes!

CM Powers <cm.powers@live.com>

Sat 2/6/2021 11:50 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Often from something bad, comes something good, and when we least expect it. And so it is with the quiet restoration of our Oceano Dunes as a result of the Covid19 stay-at-home orders, limited gatherings, and state park closures.

Our local environment is displaying a health, beauty and vigour missing for several decades. Local residents are literally breathing easier, children are playing, and local families, homeowners, and tax payers are able to finally enjoy the natural hometown beauty and amenities of their own back yard: the Oceano Dunes.

Please do not allow the weekend vehicular marauders to return to business as usual; the trash & dash population from out of the area, who in their arrival and departure respect neither nature or the local populace who must contest with their behavior, and the devestating results left behind each nosiy, rowdy visit.

Tourism and Environmentalism must be two halves of a singular whole. An unhealthy environment is of no use to anyone, and eventually destroys the entity that was the attraction in the first place.

Please do not return the status of the Ocean Dunes to "as before" but rather, provide a new dynamic for this amazing place of quiet natural beauty, and a sustainable resource for people, plants and animals.

Sincerely,

Mary Powers & Lee Hood
Baywood-Los Osos, CA

🌿_____🌿
"Don't waste electricity, paper, food. Live the way you want to live, but just don't waste. Look after the natural world, and the animals in it and the plants in it too; this is their planet as well as ours."
-- Sir David Attenborough

Protect Oceano Dunes!

Jenny Dull-Frost <jendull13@hotmail.com>

Sat 2/6/2021 11:39 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Hello,
I want to express my concerns about the beach environment at Oceano Dunes and major disappointment in State Parks in regards to Oso Flaco.
I like to quote: “I want to see foot steps in the sand, not tire marks”
I met a Ranger who patrolled Oceano Dunes at night and he told me there have been murders, drug dealing, prostitution, and drunken violence from those camping on the beach. Many people have been injured, hit by ATVs, trucks while playing on the beach. It’s not responsible and we need to change this. Safety, beauty for all to enjoy without vehicles. Park in the lot and walk onto beach!

I was informed that there is a proposal to State Parks at Oso Flaco to turn it into a gun range, concessions, and vehicles allowed on beach/camping. Is this for real? Why would we allow this? Please do not let this happen to our wonderful coast line! And of course we need to protect the Snowy Plover and other creatures.

Thank you for listening,
Jenny Frost

Get Outlook for iOS

Keep Oceano Dunes open to OHV and camping

Matthew Roberts <mjrobert@calpoly.edu>

Sat 2/6/2021 11:07 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear CCC representatives,
I live in Pismo Beach and would like to see the Oceano Dunes remain open to off road vehicles and to driving and camping on the beach, as the CA State Parks department is proposing to you. We use the area and love being able to do these things close to home. Additionally, the economic activity that this tourist attraction brings to the local area is key to the communities success.
Thank you for your consideration.
Matthew Roberts

Protect Oceano Dunes and Oso Flaco!

Kelly Cherry <kellywcherry@gmail.com>

Sat 2/6/2021 10:40 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

As a resident of San Luis Obispo County, I would like to support your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, **AND PLEASE** leave Oso Flaco as it is. OSO FLACO IS A BEAUTIFUL JEWEL OF THE CENTRAL COAST - one of the most magical places I have ever been. This is a great draw for birding enthusiasts! Catering to one type of (destructive!) recreation should not be allowed to ruin the serene beauty of our little slice of paradise.

Also, we really enjoyed being able to walk safely on the beach when the park was closed to vehicles - we support a phase out OHV activity.

Please, save our local treasures!

Kelly Cherry

287 Equestrian Way

Arroyo Grande, CA 93420

(No subject)

JimSheila Miller <jimsheilamiller@gmail.com>

Sat 2/6/2021 10:36 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

As a resident living on the Nipomo mesa I support and applaud the Costal Commission plan for Oceano Dunes State Park. Your plan addresses the air quality issues from which we have suffered while maintaining affordable recreational opportunities. Your plan also addresses the sensitive environmental issues that have been ignored in the past.

My husband and I have often had to curtail our activities due to air quality alerts. It does not seem fair to me that we have to deal with the essential effects on our health while others pursue nonessential recreational activities. Please protect us and our environment!

Sheila Miller
1017 Jacqueline Pl.
Nipomo, CA 93444

Protect Oceano Dunes!

K. Reka Badger <badgerwerx@gmail.com>

Sat 2/6/2021 10:29 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Sincerely,

Kathryn Badger

Re: Protect the Oceano Dunes

Laurel Sherrie <laurel@laurelsherrie.com>

Sat 2/6/2021 10:24 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Laurel Sherrie
Arroyo Grande Resident

--

Laurel Sherrie Studio
California Landscape Painter
laurel@laurelsherrie.com
www.laurelsherrie.com
805-473-4640, Arroyo Grande, CA 93420
Facebook: www.facebook.com/LaurelSherrieStudio
Blog: http://laurelsherrie.com/blog

Protect Oceano Dunes!

rosemary wilvert <rosemarywilvert@gmail.com>

Sat 2/6/2021 9:52 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

Thank you for your work to save our environment,

Rosemary Wilvert

San Luis Obispo

Protect Oceano Dunes!

Martha Farahat <marty.farahat@yahoo.com>

Sat 2/6/2021 9:24 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

One major reason given for repoening the Dunes to vehicular traffic has been an assumed positive economic impact from that traffic. A recent study by a CalPoly professor shows that assumption to be erroneous. Here is a link to that study: Patel's study

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.



The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Respectfully,
Martha Farahat, Oceano resident

Sierra Club Santa Lucia Chapter

Protect Oceano Dunes!

Cindy Lewis <drlewis@lewisassoc.com>

Sat 2/6/2021 8:28 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Cynthia Lewis, Ph.D.

President, Lewis Associates Medical Strategies
Email: drlewis@lewisassoc.com
Website: www.lewisassoc.com
Mail: 1885 Laguna del Campo, Templeton, CA 93465

Staff recommend parks plan!

BJS ATV RENTALS <bjsatvrentalsinc@gmail.com>

Sat 2/6/2021 7:45 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>
Cc: Miggins, Sarah@Parks <Sarah.Miggins@parks.ca.gov>; Crowfoot, Wade@CNRA <Wade.Crowfoot@resources.ca.gov>; Pearce, Kevin@Parks <Kevin.Pearce@parks.ca.gov>

Kevin, Wayne Foster, president BJ'S ATV Rentals INC. I have read the recommend plan and even though I'm saddin and disagree with at least I want to thank you for recommending a 5 year plan instead of the cruel 14 months that parks dropped on us on January 1, 2021. What ever happens though I don't think your staff members have spent any time on the beach because there is no way camping between pier and Grand will work! There's not enough space to move back during high tide and the poor inexperienced people will get washed away! We're out there (WERE) out there dayly and we can't drive that section of the beach during high tide. Just seems risky to sacrifice those poor innocent people for Oceano to get Pier Ave closed. Wayne.

Protect Oceano Dunes!

dknagel4u@aol.com <dknagel4u@aol.com>

Sat 2/6/2021 7:23 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Commissioners

It is high time and way passed time for your Commission to protect the natural and human resources of and adjacent to the Oceano Dunes. Please stop the destructive offroad vehicular activities on the beach and dunes. People's lives are at stake and you have the authority to save their health and well being. Please fulfill your duty to protect coastal resources.

Sincerely,

David Nagel
1715 Berwick Drive
Cambria, Ca 93428

Protect Oceano Dunes!

Randee LaSalle <rslnipomo@gmail.com>

Sat 2/6/2021 7:11 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Coastal Commisson,
We support the recommendations of staff regarding vehicles on the dunes. The destruction of the dune vegetation by OHV is shooting ourselves in the foot. Vegetation helps to sustain the natural birds and mammals that live there and keeps the surface from blowing into and polluting the air. Threatened and endangered shorebirds and seabirds rely on vegetation and protection for nesting and food.

In both Minnesota and Florida we were trained to be stewards of the land to keep it in place for our children and grandchildren. Locals helped State and Federal Park staff to maintain snowmobile trails in the winter and biking and hiking trails in the summer to provide access to all. We recreated in designated areas based on seasonal birds' migration and nesting habits It is proven that without these protections survival of these birds is severely impacted each year. We worked in conjunction with local sports groups and the state Department of Natural Resources (DNR). Citizen volunteers worked with State Park staff to maintain these trails and rope them off if necessary.

We need to be respectful of and serve to preserve these dunes, and use them to keep them a part of our legacy to upcoming generations here in California.
Support those of us who don't want to see the dunes destroyed but preserved. Thank you.

Randee LaSalle and Kevyn Schweim
Nipomo, California

Sent from my iPhone

Protect Oceano Dunes!

C Fog <jcfoglietta@gmail.com>

Sat 2/6/2021 6:55 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Protect Oceano Dunes!

Christine Mulholland <cm1334@outlook.com>

Sat 2/6/2021 6:51 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Commissioners,

I was a member of the San Luis Obispo County Air Pollution Control District Board when it contracted for a scientific study of the air quality in the area of the Oceano Dunes. Though some of us personally believed that there was a nexus between the poor air quality and the off highway vehicle riding, we did not make any assumptions, but looked to the science to inform us.

Your commission has the responsibility to protect the fragile coastal dunes complex, threatened species, and environmentally sensitive habitat area. The science is clear. Off-road vehicles are not compatible with the protection of a fragile coastal dunes complex, the surrounding air quality, threatened species, and environmentally sensitive habitat area.

Please support the phase out of off road vehicle riding on the Oceano Dunes. It is long overdue.

Thank you,

Christine Mulholland
San Luis Obispo
805-544-6618

Protect Oceano Dunes!

Dick Dixon <cambriaman99@mac.com>

Sat 2/6/2021 6:46 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please take action to save the Oceano Dunes and their entire ecology from destruction by unnecessary off road vehicle admittance. The Dune are a natural wonder and contribute a healthy accepting environment for the creatures and plants that comprise the Dune environment. Stop the senseless destruction, PLEASE!
Richard Dixon
Margaret Dixon
Cambria CA
Dick Dixon Up in the iCloud

Protect Oceano Dunes!

Elaine Genasci <elgenasci@gmail.com>

Sat 2/6/2021 6:41 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Sincerely,

Elaine Genasci

462 Chorro Street

SLO, CA. 93405

--

"The Earth is what we all have in common."
-Wendell Berry

Protect Oceano Dunes!

Brooklynn Ramos <pregame22@gmail.com>

Sat 2/6/2021 6:15 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Sierra Club Santa Lucia Chapter

Sent from my iPhone

Please Save our Dunes!

Jeanie K. Smith <jksmith614@gmail.com>

Sat 2/6/2021 6:02 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

I was appalled to learn of the State Parks' recommendations for further expansion of human activity on the Oceano Dunes, including an obstacle course & mile-long track, an OHV staging area, 225 RV sites, a museum, a weapons range, and more – all in environmentally sensitive habitat. This plan must NOT be approved— please save our coastal habitat from even more intrusion and erosion!

Instead of expanding and building and encroaching even more on the Dunes, State Parks and the Commission should continue to pursue phasing out of ODSVRA and limiting the extent and kinds of activities that are allowed. It's a fragile environment that requires our protection and that will only happen if management carefully limits human impact.

I urge the commission to support and implement your own recommendations for the Oceano Dunes, when you said in 2019: *"It is time to start thinking about ways to transition ODSVRA away from OHV use to other forms of public access and recreation that better respond to the current realities that affect and are affected by activities at this shoreline location…"*

Please amend the State Parks Coastal Development Permit: ban night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and renew/continue all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year to put these measures into effect on their own. Above all, you must initiate the phase out of OHV activity— clearly State Parks has no intention of doing that on their own.

The economic arguments against doing this were refuted during the park's closure to vehicles last year. In spite of the pandemic, a healthy level of tourism continued without driving on the Dunes. Plus there was a welcome reduction in vehicle noise, no more sand dust in residents' living rooms, and coastal habitats began to make a return.

The residents of Five Cities can't walk on the beach without danger from (often drunk) drivers, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice.

State Parks is not fixing the problem and only plans to make it far worse. It's up to the Commission to rein in this short-sighted and disastrous misuse of a precious resource. Please act now to do the right thing for our California coast!

Thank you for reading,

Jeanie K. Smith
California citizen since 1956
Resident of Arroyo Grande mesa, only 3 miles from the Dunes (and I can hear the hot-rodding vehicles from there)

Jeanie K. Smith
jksmith614@gmail.com

Protect Oceano Dunes!

Will Power <wrppwr@gmail.com>

Sat 2/6/2021 5:32 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

This letter perfectly expresses our feelings on this issue. Please take action in this matter. You all know this is the right thing to do here, so please just do it! —Will and Debbie Power, residents 47 years in Arroyo Grande, CA.

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Sierra Club Santa Lucia Chapter

Protect Oceano Dunes!

chloe smith <beautyofliving11@hotmail.com>

Sat 2/6/2021 5:10 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Chloe Smith

Protect Oceano Dunes!

Christie Withers <cwithers61@gmail.com>

Sat 2/6/2021 5:08 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please don't allow off road vehicles in the dunes. Continue to allow access to people to explore the dunes, and camp on the beach.

Sent from my iPad

Oceano Dunes

kayaker paddler <kayakersandcat@gmail.com>

Sat 2/6/2021 4:53 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

PROTECT BIOLOGICAL DIVERSITY AND WILDLIFE AS THE PRIMARY GOAL!

STOP THE INSANE RIDING OF FOSSIL FUEL VEHICLES IN THE DUNES!!!!!

NO MORE DEVELOPMENT UNLESS YOU ADD MANY MORE ACRES. IT'S ALREADY TOO CROWDED!

Irene Schmidt

Sent from my iPad

Protect Oceano Dunes!

Mary Jane Peterson <maryjanepeterson.chipman@gmail.com>

Sat 2/6/2021 4:39 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please help preserve our dunes. There have also been too many accidents & destruction of this beautiful place.
Footprints & Not destruction and pollution.
Thank you for preserving this place for future generations, Mary Jane Peterson, Larry Chipman and Wesley Peterson Atascadero California
Sent from my iPhone

Protect Oceano Dunes!

Judith Graham <gingermintgraham@yahoo.com>

Sat 2/6/2021 4:15 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Sincerely, Judith G. Anderson

Protect Oceano Dunes!

Jon Sofer <jsofer@hotmail.com>

Sat 2/6/2021 4:05 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Sierra Club Santa Lucia Chapter

Protect Oceano Dunes!

Maryan Infield <maryan.infield@gmail.com>

Sat 2/6/2021 4:00 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please protect the Oceano Dunes! We do not need off road vehicles to add to the already bad air quality in Oceano.

Listen to what the people who live here wants!

Sincerely,
Maryan Infield
San Luis Obispo, Ca

Protect Oceano Dunes!

Steven MacGregor <smacgregor52@hotmail.com>

Sat 2/6/2021 3:59 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

NO MORE TIRE TRACKS IN THE DUNES.
ACT NOW

Protect Oceano Dunes!

Steven Mabry <stevenmabry@me.com>

Sat 2/6/2021 3:47 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Commissioners,

Let's admit it, we live on a fragile planet that's groaning under our weight. We need to live lighter but we keep bearing down, even doubling down, on taxing our environment and our fellow species.

In the interest of the health and wellness of everything and everyone that lives near Oceano Dunes, shut the off-road vehicle access down. Need more reasons?
1) Almost every year people died in the park from vehicle accidents. Such tragedies are not necessary or worth it.
2) Vehicles on the beach have to be transported to the beach. I live in Paso Robles and every Friday night an endless parade of motor homes and double-cab pickup trucks from the central valley spew their fumes as they drive their 10mpg tow vehicles to the beach. I know ATVs are fun but it's time for folks to be part of the solution for our changing climate.

So please, give our environment a fighting chance by shutting down the vehicle access to Oceano Dunes. Years ago the community of Morro Bay shut down vehicle access to the beaches north of the rock. It increased tourism, walking, and wildlife. Everybody wins when nobody rides.

Give it some thought.
Thanks for reading.
Steven C. Mabry, Ph.D.

Oceano Dunes

Sue Moran <smtatccc@gmail.com>

Sat 2/6/2021 3:40 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Commissioners:

I beg you to follow your staff's recommendations to protect our dunes and keep vehicular traffic off them. Please do the right thing and adhere to the law. No more politically motivated exceptions!!! This is the time to stand up against the Park personnel who have their own limited agenda. They are guilty of over reaching their authority. Please go for the greater good and for future generations. We need nature, and we need to protect our climate as well. Act now to STOP the PARK.

Respectfully,
Sue Moran Thole
Grover Beach, CA

Protect Oceano Dunes!

mcouacaud@charter.net <mcouacaud@charter.net>

Sat 2/6/2021 3:29 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

I am a 40 year resident of San Luis Obispo county and truly value the beauty of our coast. It is time to act now to save the Oceano Dunes!

Sincerely,
Marc Couacaud
253 Loma Bonita Dr.
San Luis Obispo, CA

We Believe In Miracles for Oceano

bill house <pirate805@gmail.com>

Sat 2/6/2021 3:25 PM

To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; info@lairdforcasenate.com <info@lairdforcasenate.com>; Office of the Secretary CNRA <secretary@resources.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>
Cc: Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; CCCA3858@gmail.com <CCCA3858@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; Christie, Sarah@Coastal <Sarah.Christie@coastal.ca.gov>; Kchristensen22@comcast.net <Kchristensen22@comcast.net>; Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Bonnie@pacificcoastpro.com <Bonnie@pacificcoastpro.com>; Glimon@caleja.org <Glimon@caleja.org>; Tiffany@caleja.org <Tiffany@caleja.org>; Maricela@causenow.org <Maricela@causenow.org>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Tkeith@co.slo.ca.us <Tkeith@co.slo.ca.us>; Abeals@co.slo.ca.us <Abeals@co.slo.ca.us>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; Hharmon@slocity.org <Hharmon@slocity.org>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Chinook.shin@sen.ca.gov <Chinook.shin@sen.ca.gov>

Just as President Biden and Governor Newsom are signing executive orders on the environment, health, equity, economy, justice, poverty and discrimination because they can longer wait or be delayed.These regulations will take effect 30 days after signing. The Coastal Commission can do the same for the Oceano Dunes.

We believe in miracles for Oceano. With the transition that is already taking place and by using new stimulus and infrastructure funding we have the opportunity to pair policy with funding to bring environmental justice, meaningful change and equality to Oceano and surrounding communities.

This is one of those once in a lifetime leadership moments when we can make a profound difference in shaping the future and leave no one behind. Do you believe in miracles for Oceano ?

Protect Oceano Dunes!

William Renke <brenke51@gmail.com>

Sat 2/6/2021 3:25 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Sincerely,
William Renke
Los Osos, CA

Sent from my iPhone

Protect Oceano Dunes!

Charter Email <scotterman@charter.net>

Sat 2/6/2021 3:17 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

For the sake of the environment...beauty...human health...and more...please protect the Oceano Dunes! It's beyond time to coexist with nature's sustainable ecosystem! Thank you

Protect Oceano Dunes!

LeAnne Rothhammer <leannerothhammer@gmail.com>

Sat 2/6/2021 3:16 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Hello,

I have lived in Arroyo Grande for 32 years and have seen the major changes that have taken place in regards to our air quality. It has changed because of the lack of vegetation on the dunes from all of the off road vehicles. Any time the wind blows the winds puts so much sand in the air that I have to go inside my house. I have to close all windows as well. It wasn't like that 15 years ago. All you have to do is check the PM2 on the windy days to see how bad it is. We have the worst air quality in the country because of the way the parks and recreation decide to take advantage of how much money they can make. It is ridiculous that so many people are allowed to just tear up and ruin the beach with all of the car activity. For many years already, after a big weekend, I find all of the dead sand crabs and broken clams. It is so sad for the environment to allow this to continue. Not to mention all of the lawsuits from people that have lung disease from the sand in the air. There are so many other activities that better and protect the dunes.

LeAnne Rothhammer
Arroyo Grande resident

Sent from Mail for Windows 10

Protect Oceano Dunes!

Anaundda Elijah <satchitananda3@att.net>

Sat 2/6/2021 2:56 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

CANCEL ALL MOTOR VEHICLES ON THE DUNES.
IT IS DESTROYING THE ENVIRONMENT!

ANAUNDDA ELIJAH
SAN LUIS OBISPO

Protect Oceano Dunes!

Laurie DeWitt <beachdoxie@charter.net>

Sat 2/6/2021 1:43 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please protect the Oceano Dunes for wildlife, for endangered species, and for people who actually want to enjoy the area while out of a vehicle.

Thank you,
Laurie DeWitt

Sent from my iPhone

Protect Oceano Dunes!

Charlie Lawrence <lawrencecharlie848@gmail.com>

Sat 2/6/2021 11:21 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

C'mon, let's enforce the law(s) and return this beach back to the town (and citizens) it's named after.

Protect Oceano Dunes!

Gina Mori <winamarieag@aol.com>

Sat 2/6/2021 8:05 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Stop off reading at Oceano dunes. It’s destroying the ecosystem. It’s time to save the dunes. There’s a reason no other beaches in California allow this. Discontinue all use of back dunes. Allow limited vehicle use and camping. No more ATV rentals allowed.

Thank you for your consideration.

Protect Oceano Dunes!

john lucas <johnaklucas@gmail.com>

Sat 2/6/2021 6:58 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

To whom it may concern

Please do what you can to protect the Oceano Dunes. We live in coastal San Luis Obispo County and we NEVER go to the Dunes anymore. Our last visits made us realize Oceano has become overcrowded, loud, it smells like exhaust, motor vehicle guests and yeah go hand in hand, the partying is out of control, and a friend of paramedics, I know the injury and fatality calls happen every year.

A more protected dune environment for Oceano would mean less money for gas stations, but a positive in many more ways.

Thank you

Protect Oceano Dunes!

Hank catron <catronhank@yahoo.com>

Sat 2/6/2021 6:50 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Henry Catron

Sent from Yahoo Mail for iPhone

Protect Oceano Dunes!

Kathy Oliver <kathyokayoliver@gmail.com>

Sat 2/6/2021 6:36 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity. As I am sure you know, the temporary closure of the dunes had NO negative impact on the economy in Pismo and Oceano. There are no more excuses for prioritizing ORV's over the environment.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment.

Kathleen Oliver. 24 Cypress Glen Ct. Cayucos CA 93430. 805 710-1031

Protect Oceano Dunes!

Phil Wagner <pmwslo@yahoo.com>

Sat 2/6/2021 6:06 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

The time for action has come. You need to acknowledge the damage off road vehicles do to the Oceano Dune complex. State Parks has been dragging their feet in the guise of obtaining further data. Really? The APCD and the medical community have provided all the scientific data you need to justify shutting down the off road vehicles on the dunes. Stand up for the environment and public health and make the hard decision. Don't let monied interests win again.

Thank you for your consideration.

Phil Wagner
SLO, CA

Protect Oceano Dunes!

Lisa French <10sandytoes2@gmail.com>

Sat 2/6/2021 5:52 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I too would like to see greatly reduced or eliminated off road vehicles in the Oceano dunes.
The reasons are environmental protection of the dunes and snowy plovers and less polluting vehicles on the beach.
Thank you
Lisa French
Grover Beach, CA

Protect Oceano Dunes!

Jill ZamEk <jzk@charter.net>

Sat 2/6/2021 5:41 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

I have lived on the Central Coast since 1976 and have enjoyed its beauty and the opportunities for outdoor recreation.

I urge you to support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to:

- bar night riding and driving across Arroyo Grande Creek,
- close the Pier Avenue ramp,
- preserve the plover exclosures,
- leave Oso Flaco as it is - a tranquil and peaceful retreat,
- start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes. These are the kinds of activities that characterize the healthy economies of every other beachfront community in California - with the exception of Oceano. Dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued and supported the local economy.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Sincerely,

Jill ZamEk
Arroyo Grande

Protect Oceano Dunes!

CHRISTINA MARTIN <tinadon72@gmail.com>

Sat 2/6/2021 5:15 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Don and Christina Martin

Protect Oceano Dunes!

Tom Edell <tedell@aol.com>

Sat 2/6/2021 4:52 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Oceano Dunes, also known as the Guadalupe-Nipomo dunes complex, is one of the most extensive dune systems on the west coast. It is a 3,500-acre park that encompasses eight miles of beach, shoreline, and dunes on California's Central Coast, fronting the community of Oceano.

Off-road vehicles are not compatible with the protection of a fragile coastal dunes complex, threatened species, and environmentally sensitive habitat area. For those reasons and more, off-road vehicles must be phased out at Oceano Dunes in favor of traditional, low-impact beach recreational use.

As the CA Coastal Commission told State Parks in 2019: "It is time to start thinking about ways to transition ODSVRA away from OHV use to other forms of public access and recreation that better respond to the current realities that affect and are affected by activities at this shoreline location…"

For the CA Coastal Commission's March 18 meeting, State Parks has produced a draft management plan that ignores this instruction and instead doubles down on off-road expansion. Their plan proposes a new 33-acre OHV obstacle course & mile-long track, an OHV staging area, 225 RV sites, an OHV museum, a weapons range, and more – all in environmentally sensitive habitat. That plan must not be approved.

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without dodging vehicles, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

It's time to amend the coastal permit for the park and begin phasing out off-road activity on the dunes.

Thank you for all you do for the environment,

Tom Edell

Cayucos, CA
tedell@aol.com

Protect Oceano Dunes!

Jeri Edwards <jeri.lewis.edwards@gmail.com>

Sat 2/6/2021 4:48 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

I'm a resident of SLO County and specifically Arroyo Grande. During the stay-at-home order last year due to COVID, vehicles were barred from driving on the dunes. This couldn't have come at a better time - hopefully NOT a once in a lifetime opportunity - to experience as a pedestrian without any vehicles the most pristine stretch of beach we have left in California, perhaps the United States. For the first time in my lifetime I could breath, meditate, observe all sorts of birds, including endangered species, and envision what this area would be like without the damaging vehicles. I'm asking you to please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to **bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity. Oso Flaco must not be developed!**

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast. Without a doubt, tourism will grow without the destruction caused by vehicles and heaps of trash left behind.

The residents of the town of Oceano and others who live nearby, like myself, can't walk on their beach without taking our lives in our hands, and we are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect the Environmentally Sensitive Habitat Area. You must do so now. Time is of the essence. It's time to stop allowing State Parks to obfuscate and ignore their responsibility to be more accountable to the environment and to the people who support a vehicle-free beach.

Thank you for your consideration.

Jeri Edwards

Protect Oceano Dunes!

rob mohle <rlmohle@gmail.com>

Sat 2/6/2021 4:47 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please phase out off-road vehicle use at Oceano dunes. This type of recreational activity is not compatible with the sensitive dune habitat. Thank you

Sent from my iPhone

Protect Oceano Dunes!

Kathryn Tribbey <kreid@fastmail.fm>

Sat 2/6/2021 4:36 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Please protect the Earth and all its inhabitants now.

Thank you.

Kathryn Tribbey

--

Kathryn Reid Tribbey
kreid@fastmail.fm

Protect Oceano Dunes!

Constance DePiero <cgdepiero@gmail.com>

Sat 2/6/2021 4:28 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Constance DePiero

Protect Oceano Dunes!

David Cox <davidmcox@gmail.com>

Sat 2/6/2021 4:21 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own.

As a bird watcher and environmentalist this is a critical area of the central coast of California. It needs to be protected!

David M. Cox
Los Osos CA

Protect Oceano Dunes!

Barry Price <pricebarrya@gmail.com>

Sat 2/6/2021 4:12 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners:

Please support and implement you have held in abeyance since
In July 2019 you gave the California Dept of Parks and Recreation a year -- now stretching to 18 months -- to implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, and leave Oso Flaco as it is.

I urge you to support and implement these and other long-overdue management measures. Above all, please start the clock now on the phase out of OHV activity.

Barry Price
San Luis Obispo

Protect Oceano Dunes!

Linda Rose <lindirose268@gmail.com>

Sat 2/6/2021 4:11 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Inda
Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Linda Rosenblatt
2700 Cienaga St, Oceano, CA 93445

Protect Oceano Dunes!

Katherine Keeney <keenkatyk@gmail.com>

Sat 2/6/2021 4:07 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I recently read a report from a Cal Poly Economics professor about the 2020 revenues of Oceano tourism. This was during a time the dunes were closed for off-road vehicles and apparently none of the businesses took a major hit & it seems that people still come to Oceano aside from off-roading on the dunes.
If the local economy is a factor in your assessment, please reconsider this report. The prior report that the businesses would suffer was apparently based on limited data analysis.

Our environment and the protection of the natural habitat is of utmost importance locally and around the globe at this juncture in our civilization. I'm not sure what you base your assessments on but it's clear that if you allow these vehicles to further disrupt and damage this environment, you will be contributing to the de-evolution of many species, including our own.

Thank you for your help,
Katherine Keeney

Protect Oceano Dunes!

Helen Sherry <cqhs2@me.com>

Sat 2/6/2021 4:05 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I agree totally with the Sierra Club message below. We have a unique opportunity to protect this fragile area.

Additionally, as a Nipomo Resident, I am also concerned with the churning up of the Dunes by off road vehicles adding to the blowing glass particles threatening our air quality.

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

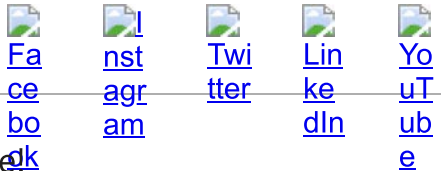
The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Sierra Club Santa Lucia Chapter

Sincerely, Helen Sherry, PhD.



Reconnect to the Magic of Life!

Helen M. Sherry, Ph.D.
LiveandGrow.com
Sent from my iPhone

Protect Oceano Dunes!

deepali panjabi <dpanjabi@hotmail.com>

Sat 2/6/2021 4:02 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

I am particularly concerned about the welfare of the snowy plovers who are constantly under stress and peril from OHV activity. It is a miracle they have still survived under these conditions. We must protect them and help them to thrive. They are not replaceable.

Thank you for all you do for the environment,

Deepali Panjabi

2030 Chorro St.

San Luis Obispo, CA 93401

805-784-0579

Protect Oceano Dunes!

David Schaechtel <davesbuster@yahoo.com>

Sat 2/6/2021 4:01 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

I lived on The Strand back in 1977 and was horrified to see what went on there, especially on three-day weekends. The residents of the town of Oceano can't walk on the beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

David Schaechtel
San Luis Obispo, CA

Protect Oceano Dunes!

shgitler@gmail.com <shgitler@gmail.com>

Sat 2/6/2021 4:00 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Stanley H. Gitler
1014 Jane Ann Court, Nipomo, CA 93444-6667
shgitler@gmail.com ; Home: 805-343-2916; Cell: 215-359-8928

****CONFIDENTIALITY NOTICE****

This E-Mail message and any documents accompanying this E-Mail transmission contain information from which is privileged and confidential information intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution and/or the taking of or refraining from taking of any action in reliance on the contents of this E-Mail information is strictly prohibited. Please reply to the sender advising of the error in transmission and delete the message and any accompanying documents from your system immediately. Thank you.

Protect Oceano Dunes!

Scott Jenkins <sjenkins111@gmail.com>

Sat 2/6/2021 3:50 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast. The economy and culture of the community would be better as there would be less of the big trucks driving around with their confederate flags.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Best regards,

Scott Jenkins

Protect Oceano Dunes!

Steve & Nancy <sloswnw@charter.net>

Sat 2/6/2021 3:40 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Coastal Commission,

Please keep motorized vehicles off of our beautiful Oceano Dunes. Driving on the dunes is an outmoded activity that is bad for our air and the dune habitat as well as the residents of Oceano. The Oso Flaco Lake area is a rich source for birds, butterflies and other animals and is a delicate ecosystem. Driving on the beach teaches children and others that it is o.k. to trash the environment. This has to stop. Please vote to protect this beautiful place.

Sincerely,

Nancy Willison
230 Catalina
San Luis Obispo, CA 93405
805/543-0325

Sent from Mail for Windows 10

Protect Oceano Dunes!

m & c bewley <bewley1974@att.net>

Sat 2/6/2021 3:36 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Mark and Celia Bewley
Sent from my iPad

Protect Oceano Dunes!

Ronda McKible <ronda@mckible.com>

Sat 2/6/2021 3:31 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear CA Coastal Commissioners,

Please vote to start phasing out OHV riding on the Oceano dunes and return the beach to those in the community who want to preserve its natural beauty. I have longed for the day when my husband + I could pitch a tent in the sand and spend the night under the stars enjoying the sounds of the surf without fear from any OHV riding. Don't we have just as much right to spend time on the beach the way we want...in peace?

All of those empty promises from State Parks, along with their recent plan to expand OHV riding, sends a very clear message. They are really only concerned about their bottom line. And why should they be catering to those who live outside of our community? Shouldn't those of us that live here have the loudest voice in the room?

Please do the right thing and vote to end OHV riding completely. Give the dunes back to the community that will love and will care for them. Thank you,

Ronda McKible

Protect Oceano Dunes!

Cheryl Dove <cheryl4pugs@gmail.com>

Sat 2/6/2021 3:29 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please preserve the plover enclosure and phase out OHV activity.
Sincerely,
Cheryl Dove

Protect Oceano Dunes!

ANDREA Fischer-Ortiz <kenya683@msn.com>

Sat 2/6/2021 3:23 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

I completely agree with this letter. The Oceano Dunes have become a dangerous place. Activities that were less impactful 50 years ago when California population was so much less have become extremely harmful to the dunes and beaches now that too many people are doing them. On a recent three day weekend the conditions were such that it was not safe to be anywhere on the beach because of the amount of cars driving around. The rangers were severely understaffed and were not able to control the multitudes of people that were at the beach. It looked like a war zone. Please restrict the amount of destruction being caused by the current uses of Oceano Beach.

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Sent from my iPhone

Protect Oceano Dunes!

janice bybee <janicebybee@hotmail.com>

Sat 2/6/2021 3:22 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Off road vehicles do not belong in a naturally beautiful environment that should be used for rest, relaxation, and environmentally safe recreation.

Our naturally beautiful areas should be preserved, not destroyed.

It's that simple.

Janice Bybee

Sent from my Verizon LG Smartphone

Protect Oceano Dunes!

Jocelynn Marriott <jocelynnmarriott@gmail.com>

Sat 2/6/2021 3:18 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,

Sierra Club Santa Lucia Chapter

Member: Jocelynn Marriott

Virus-free. www.avg.com

Protect Oceano Dunes!

Joan McKenna <trixie@charter.net>

Sat 2/6/2021 3:17 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please allow the natural habitat to be left alone.

Sent from my iPhone

Protect Oceano Dunes!

Bob & Jacquie <pnt4816@yahoo.com>

Sat 2/6/2021 3:12 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Footsteps not dune buggy tracks!

Sent from my iPhone

Protect Oceano Dunes!

Cheryl Lewis <cmlnp50@gmail.com>

Sat 2/6/2021 3:09 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Mrs. Cheryl Lewis
San Luis Obispo

Sent from my iPad

OHV Activity Oceano Dunes

derinda gates <derindagates@hotmail.com>

Sat 2/6/2021 3:06 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Sent from Mail for Windows 10

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Derinda & Richard Gates

Protect Oceano Dunes!

Angela Woodcock <angela.theinnertemple@gmail.com>

Sat 2/6/2021 3:04 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I have lived here in the beautiful central coast for more than a decade and I do understand the romance associated with being able to drive your vehicle on the sand in California, but sadly, we must come to the reality that this kind of behavior is no longer tolerable on our fragile and ever more threatened planet.

Thank you for your consideration, Angela Marie Woodcock
93405

Sent from my iPhone

Protect Oceano Dunes!

Susie Silva <ecosusie@gmail.com>

Sat 2/6/2021 2:52 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Coastal Protection Commission,
When I was a little girl my family and I would spend our limited vacation time at the Oceano Dunes. At that time the abundance of wildlife and natural habitats was amazing including the snowy plover and the Pismo clam. We had wonderful family memories of those times. I had forgotten how beautiful the dunes once were before the thousands of noisy, carbon producing, ill mannered vehicles were allowed to destroy this beautiful place. During the pandemic when the dunes were closed to traffic I ventured out into the dunes once more. I was amazed at how beautiful and peaceful the dunes were once again. The amount of medium size Pismo clams on the beach was awesome. Please protect this precious part of the central coast for my grandchildren and their children. More than ever we need to preserve these last vestiges of peace and serenity. Please don't let greed and profit have the last word.
Respectfully, Susan Silva

Protect Oceano Dunes!

Jeannette Sofer <jeannette.sofer@gmail.com>

Sat 2/6/2021 2:49 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment

Jeannette Sofer

Protect Oceano Dunes!

Jerry Stover <jerrystover6@gmail.com>

Sat 2/6/2021 2:42 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please stop the destruction of the Oceano Dunes by off-roaders.

Protect Oceano Dunes!

Su Campbell <mamaof3inag@aol.com>

Sat 2/6/2021 2:40 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

My name is Susan Campbell and I have lived on the Central Coast for most of my life. During my late teens I worked as a waitress at the Surfside Cafe located at the end of Pier Street in Oceano Beach. At the time that I worked there in the late 70's, there was no limit to the number of vehicles that could go on the beach and it was no fee to drive on the beach. On three-day weekends we would stay open 24 hours at the Cafe because there were people coming and going at all hours. These people brought a lot of dollars to the businesses that were at the beach but the environmental impact was horrendous, trash, traffic, human waste you name it. At that time I was an advocate for the "dune riders" I thought it was all sand, what would it matter? Fast forward 40 plus years and I have been educated to the destruction that "riding" the dunes can do to the wildlife and plant life in and around the beach. My first education came when I walked the path at Oso Floco and noticed what a difference there was to the terrain on one side of the fence compared to the other, the side that allowed beach access to recreation vehicles was barren, with not plant life and very little wildlife. The side that did not allow vehicles was covered in plants and wildlife, what a difference a fence made. I also run on the beach between Grover Beach and Oceano, I have done this for over 35 years and I often pick up plastic trash during my run. After a storm 2 years ago I picked up over 800 water and drink caps in one morning!!! (see pic below) This last year, without the cars the amount of trash to pick up had gone down tremendously, although now with the reopening, it has increased again. People camp out for the day, have a fire and then just walk away, I have found everything from dirty diapers, to used condoms to feminine hygiene products along with every kind of plastic container, wrapper imaginable. Please protect the Oceano Dunes, protect our beaches, protect our ocean. I beg you.



Protect Oceano Dunes!

Kate Joyce <tetrademia@yahoo.com>

Sat 2/6/2021 2:40 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Chairman Padilla and Commissioners,

Please work to phase out off-road vehicles at Oceano Dunes. Allowing vehicles there means that only a small percentage of our population get to use this huge, beautiful area. I would love to be able to explore there with my kids.

Please also do NOT accept the draft management plan from State Parks that will include a new 33-acre OHV obstacle course & mile-long track, an OHV staging area, 225 RV sites, an OHV museum and a weapons range. This is crazy! We need more nature accessible to all not just to the people who with their own dune buggys. And we need to protect a huge chunk of natural coast land.

The recent shutdown has shown that off-roading is not the economic help to the area that it was thought to be:

Off-road riding at Oceano Dunes has 'no significant impact' on SLO County economy, study says

Please do the right thing and phase out off-roading at the Oceano Dunes. It is so outdated and unnecessary.
K. Joyce

Protect Oceano Dunes from an RN

cstrycker@gmail.com <cstrycker@gmail.com>

Sat 2/6/2021 2:30 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

As a registered nurse that works in the ICU at twin cities, it's very important to me to have open spaces. Being able to mentally relax in nature is vital to community health. Also limiting smog emission from off road vehicles will reduce disease processes such as COPD, AHDH, and stokes. This is well documented in peer reviewed journal articles. If you would like to speak further about this please feel free to call me at 512-423-7972.

Sincerely,

Chloe Rivas, RN, BSN, CCRN

Protect Oceano Dunes!

Lani Steele <lcs@pacificjungle.net>

Sat 2/6/2021 2:30 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

WE have been asking this for years - please ACT NOW to save the dunes for our children and their children.
Lani Steele
Los Osos

Protect Oceano Dunes!

Robert Hatch <rob@wisdomwerks.net>

Sat 2/6/2021 2:20 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please do everything to preserve the natural beauty, unique species and make it peaceful for all to use safely. Reduce ATV traffic.

Robert Hatch
+1-805-550-0080 phone
Rob@rchatch.com
Rob@tribeauto.com
Rob@wisdomwerks.com

Protect Oceano Dunes!

Doug Overman <doverman53@gmail.com>

Sat 2/6/2021 2:18 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I only go to the Oceano Dunes when the vehicles are banned. Stop this nonsense. I think that a lot more revenue generating people will visit the area when the vehicular traffic is banished.
Douglas Overman
805-550-4178

Protect Oceano Dunes!

Annabell OConnor <annarabea@att.net>

Sat 2/6/2021 2:18 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so now.

Thank you for all you do for the environment,
Annabell O'Connor

Protect Oceano Dunes!

Vicki Ramos <vjramos@aol.com>

Sat 2/6/2021 2:16 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Subject: Protect Oceano Dunes!

Dear Chairman Padilla and Commissioners,

Please support and implement your staff's recommendations for the Oceano Dunes and amend State Parks' Coastal Development Permit to bar night riding and driving across Arroyo Grande Creek, close the Pier Avenue ramp, preserve the plover exclosures, leave Oso Flaco as it is, and all other short-term management measures you have held in abeyance since July 2019, when you gave State Parks a year -- now stretching to 18 months -- to put these measures into effect on their own. Above all, start the clock on the phase out of OHV activity.

The Park would continue to offer unique experiences such as car camping on the beach, along with walking and swimming, horseback riding, birding, fishing and hiking the dunes; the kinds of activities that characterize the healthy economies of every other beachfront community in California, with the exception of Oceano. Please dispense with the fears and economic arguments against doing this, which were rebutted during the park's closure to vehicles from March to October of last year. Tourism continued, and supported the local economy, as it does the length of California's coast.

The residents of the town of Oceano can't walk on their beach without taking their lives in their hands, and they are watching the coastal dunes complex – their defense against rising sea levels – being eroded away. The plume of health-destroying particles from foredunes denuded of vegetation by off-road activity continues to stretch to Nipomo and Guadalupe. All of this is an environmental injustice. You know this, and you know State Parks is not fixing the problem and has not heeded your directive to come up with a plan to protect Environmentally Sensitive Habitat Area. You must do so **now!**

Vicki Ramos
805.441.7436

Sent from my Mobile Phone

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

To: California Coastal Commissioners

RE: March 18, 2021 public hearing regarding the future of Oceano Dunes State Park

We have read and support Commission Staff recommendations that would enable the Commission to partner with State Parks, the local community, and visitors to the area to reimagine the Park operating in more environmentally sustainable and legally consistent way. As stewards of the environment in which we live and recreate, we all need to play a part in protecting and preserving California's beautiful coastline for now and into the future. The Commission Staff's recommendations serve that vision perfectly, providing a phased out plan for off-roading while in turn expanding different types of recreational uses that will not harm coastal resources and wildlife indigenous to the Park.

Oceano Dunes is a phenomenally beautiful place that should be safely accessible by all who wish to enjoy the space. Unfortunately, that accessibility is absolutely not the case with off-roading remaining in the picture. As residents of the Nipomo Mesa, our families, friends, neighbors and those living and working downwind of the ODSVRA are continually subjected to unacceptable and extremely unhealthy air quality conditions, conditions which are scientifically proven to be directly caused by Off Highway Vehicle (OHV) use in the Oceano Dunes riding area.

We strongly urge the Coastal Commission to approve Staff recommendations addressing all ecological, environmental and air quality concerns at the Oceano Dunes SVRA. We appreciate your time and consideration of these matters and look forward to the upcoming Coastal Commission meeting scheduled on March 18th.

Sincerely,
Scott and Heidi DiSalvo
Nipomo Mesa

Oceano SVRA

Jennifer Andrade <ljandradesr@gmail.com>

Fri 2/5/2021 5:27 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

For the people? In link on your page attached below it mentioned wanting public comment to inform the committee on what the public wants. However, that is a farce. You don't care what the public wants. This is an OHV park. You have wasted and fraudulently spent our OHV funds. You don't give two craps about what the public wants so stop loading the public with the line of BS. It will come down to the CCC to being sued again and losing again.

We are beyond frustrated with your lack of commitment to the public. When Newsom gets recalled I hope each of you loose your jobs for not representing the public. You are the one of the reasons why the public no longer trusts politicians and bureaucrats.

Laurenio Andrade

http://www.coastal.ca.gov/oceano-dunes/?fbclid=IwAR3EKndOcgEp5_WpeuAIt8U6FLcxql37jhfXNjC84Ndom5Blsb_tuzL5K8I

Please stop development of Oceano Dunes State Park

Judy Philbin <judyphilbin@yahoo.com>

Thu 2/4/2021 8:37 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I am urging the Coastal Commission to reject the plan proposed for the Oceano Dunes State Park, and impose the Commission's permit conditions and a phase-out of off-roading, as recommended by staff.

Please help stop off-road vehicle expansion at Oceano Dunes State Park. After decades of problems with off-road vehicles flattening protected shorebirds and damaging coastal dunes habitat, the Coastal Commission last year directed State Parks to phase out off-roading and develop a management plan to protect natural resources and endangered species.

State Parks finally released a plan that prioritizes off-road recreation over protection of wildlife and fails to address the resource protection issues raised by the Coastal Commission. The plan would open more sensitive dune habitat to off-road vehicles and slash protected breeding areas for threatened snowy plovers and least terns by one-third. It also proposes a massive 120-acre development near Oso Flaco Lake, including more off-roading, hundreds of campsites, huge parking lots, offices, residences, and other infrastructure. This would drive off bird and wildlife species and destroy one of the best birdwatching spots in San Luis Obispo County.

Again, I urge you to reject the proposal and impose conditions which will phase-out off-roading and protect our incredible coastal habitat.

Thank you,

Judy Philbin
1480 Ella Street
San Luis Obispo, CA

Oso Flaco Lake plan

Ileen Doering <ileendoering@yahoo.com>

Thu 2/4/2021 6:56 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

The proposed expansion plan for the Oso Flaco lake area has many elements of concern. What is more important? the natural area where endangered shore birds nest or the destructive to the environment ORV expansion? They can not co exit. If the plans happen then the birds will leave the area with no where else to go. We are constantly shrinking areas where our wildlife can thrive. It is a wonderful bird watching area now. Please don't destroy it.
Thank you, Ileen Doering
Sent from Mail for Windows 10

Comments on the State Parks Draft PWP and Draft EIR

Arlene Versaw <arleneversaw@gmail.com>

Thu 2/4/2021 1:50 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Commissioners and Commission Staff:

I am writing in opposition to the State Parks draft Public Works Plan and draft EIR, both of which cannot be allowed to stand. There are so many flaws in the plan, it is inconceivable that it can or would be adoptable. Here are a few:

The PWP was to address the 2019 recommendations from the Coastal Commission. It does not in any way meet the spirit and the letter of those recommendations.
The draft PWP expands OHV riding although the Commission told State Parks any such PWP would not be approved.
The plan would decimate environmentally sensitive habitat and even eliminate some existing protections for sea birds.
The Phillips 66 Refinery land project would further increase existing air pollution issues that plague Mesa residents.
The draft EIR does not address other pollution - noise, light, traffic - that would be promulgated by the Phillips 66 project.
The sensitive Oso Flaco environment would be decimated with the addition of 200 RV campsites, 12 restroom/shower buildings, 20 cabins, 100s of parking spaces for, a motocross track, a weapons range, etc.
A weapons range? Really?
The draft PWP reduces Commission review and oversight.

I could go on, but you get the idea. This plan must be rejected. Period. Thank you for the opportunity to provide input.
Arlene Versaw

"Only truth and transparency can guarantee freedom." - John McCain
"Freedom of the press ensures that the abuse of every other freedom can be known, can be challenged and even defeated". Kofi Annan

Future of Dunes' recreation

Paul & Anne Holden <paulanneholden@gmail.com>

Thu 2/4/2021 3:00 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

My wife and I fully support staff's recommendation of winding down all terrain vehicle use on the Oceano Dunes. We feel it is not a suitable use of the rather small area and disruptive to the environment and community. A larger desert area would seem more accommodating.

We do love the ability to drive onto the beach at Grand Ave especially for sunset dog walks and limited car camping should be maintained.

Thank you - Paul & Anne Holden
Grover Beach, CA

Future of Dunes' recreation

Paul & Anne Holden <paulanneholden@gmail.com>

Thu 2/4/2021 3:00 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

My wife and I fully support staff's recommendation of winding down all terrain vehicle use on the Oceano Dunes. We feel it is not a suitable use of the rather small area and disruptive to the environment and community. A larger desert area would seem more accommodating.

We do love the ability to drive onto the beach at Grand Ave especially for sunset dog walks and limited car camping should be maintained.

Thank you - Paul & Anne Holden
Grover Beach, CA

Oceano Dunes Off-roading plan

Elyse Ungar <elysebu@aol.com>

Thu 2/4/2021 1:21 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please reject the plan and impose your own permit conditions and a phase-out of off-roading, as recommended by their staff.

Sincerely, Elyse Ungar

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Wed 2/3/2021 11:43 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Dan McCauley (dan.mccauley@gmail.com) Sent You a Personal Message
<automail@knowwho.com>
Sent: Monday, February 1, 2021 3:08 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Dan McCauley
11925 Venice Blvd. Apt. 7
Los Angeles, CA 90066
dan.mccauley@gmail.com
(310) 270-5521

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Mar. 18, 2021 Staff recommendations

Sherry Trade <sherrytrade@yahoo.com>

Wed 2/3/2021 11:33 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I am in total agreement with the current staff recommendations regarding going-forward activities at the Oceano Dunes State Park and commend the staff on a thorough and thoughtful analysis to protect the area and nature within it.

As for other activities, perhaps areas for Beach Volleyball or equipment rentals for same.

Also, the picnic bench at the ocean end of Oso Flaco was always in high demand, so more picnic benches and areas for family celebrations would be useful and helpful for low income residents.

Sincerely,

Sherry Trade

G | D | B Gatzke Dillon & Ballance LLP
LAWYERS

September 9, 2020

By Email

Armando Quintero, Director
California Department of Parks and Recreation
1416 9th Street
Sacramento, CA 95814
armando.quintero@parks.ca.gov

Re: OHV Community's Concerns that Public Works Plan May Forfeit OHV Use Rights at ODSVRA

Dear Director Quintero:

This firm represents EcoLogic Partners, Inc. ("EcoLogic"), a consortium of off-highway vehicle (OHV) groups dedicated to maintaining public access to OHV recreation areas in California and throughout the western United States. EcoLogic's members include the American Sand Association, the Off-Road Business Association, and the American Motorcyclists Association District 37. We represent hundreds of families who routinely visit the Oceano Dunes State Vehicle Recreation Area (ODSVRA) to camp and ride/drive their OHVs. We have long fought to maintain OHV use rights at ODSVRA in the face of almost constant threat from the California Coastal Commission and various groups, such as the Sierra Club, that wish to eliminate OHV recreation at the park. Those threats are now more serious than ever, and we are afraid the Coastal Commission, by demanding that State Parks prepare a Public Works Plan to replace/supersede the park's existing and operative Coastal Development Permit (CDP), is essentially inviting State Parks to forfeit the OHV use rights built into that CDP. That would be disastrous, not to mention irretrievable.

Attached for your review is a memorandum I prepared for the EcoLogic Board, in which I lay out the mechanics of this threat and the real dangers it poses. My clients have authorized me to provide this to you for your consideration. Please feel free to call me if you have any questions about it. Thank you for your attention.

Sincerely,

David P. Hubbard
of
Gatzke Dillon & Ballance LLP

Enclosure

2762 Gateway Road
Carlsbad, California 92009

T 760.431.9501
F 760.431.9512

gdandb.com

MEMORANDUM

FROM:	**DAVID HUBBARD**
TO:	**ECOLOGIC PARTNERS, INC. BOARD OF DIRECTORS**
DATE:	**AUGUST 26, 2020**
RE:	**OCEANO DUNES STATE VEHICLE RECREATION AREA**
SUBJECT:	**COASTAL COMMISSION EFFORTS TO USE PUBLIC WORKS PLAN TO ELIMINATE OHV USE FROM ODSVRA**

Introduction

Since the early 1990s, the California Coastal Commission (the "Commission") has constantly tried to reduce the amount of open riding and camping acreage within the Oceano Dunes State Vehicle Recreation Area (ODSVRA). In this effort, the Commission has had significant success, resulting in substantial losses of park area designated for OHV use and camping. About 10 years ago, however, Commission staff began to push a more radical agenda with respect to the ODSVRA, arguing that all OHV use should be eliminated to protect the federally-listed snowy plover and California least tern. We fought against this attempt to shut down OHV use in the ODSVRA and were largely successful in doing so.

More recently, Commission staff has taken yet another run at removing OHVs from the park, but now they are using slightly new tactics.

First, they have partnered with the San Luis Obispo Air Pollution Control District (the "APCD"), and together the Commission and the APCD are alleging that OHV use in the dunes is generating high levels of PM_{10} and $PM_{2.5}$, causing human health impacts in Nipomo Flats and other local neighborhoods.

Second, the Commission staff now argues that the entire ODSVRA constitutes an Environmentally Sensitive Habitat Area (ESHA) under the Coastal Act, and that OHV use and RV camping are fundamentally – and legally – incompatible with the ESHA designation. From this position, the Commission staff then claims that OHV use and RV camping must be removed from the park.

Third, the Commission has demanded that State Parks prepare a Public Works Plan (PWP) – which is the Coastal Act version of a land use management plan – to be reviewed and approved by the Commission. The PWP would effectively supersede the 1982 Coastal Development

Permit (CDP) that has governed land uses at ODSVRA since the early 1980s. As I explain below, the danger is that once the Commission approves the PWP, State Parks will lose whatever "grandfathered" rights its enjoyed under the 1982 CDP, including the right to continue allowing OHV use and camping in the dunes. The discussion below addresses this potential outcome.

Discussion

- Uses Allowed Under the 1982 CDP

In 1982, State Parks applied for, and the Commission granted, a Coastal Development Permit (CDP) covering the various uses at the ODSVRA. Because OHV use and RV camping had been part of the Pismo Beach/Oceano Dunes culture since at least 1950 and predated the Coastal Act, these activities were incorporated into the 1982 CDP as allowed uses, even though they technically did not comply with certain provisions of the Coastal Act. In land use parlance, these are known as "vested non-conforming uses" that are "grandfathered" into the permit. Though the Coastal Act does not use these precise terms, it still recognizes the concept.

The 1982 CDP remains operative and in effect at ODSVRA. Although the permit has been amended at various times since 1982, it has never been rescinded or superseded by any other governing document. This explains why the Commission's efforts to eliminate OHV use from the ODSVRA have never achieved complete success. For this reason, the Commission would love to get rid of the 1982 CDP.

- Court of Appeal Decision: *Sierra Club v. Department of Parks & Recreation* (2012) 202 Cal.App.4th 735.

In late 2010, the Sierra Club filed suit against State Parks, alleging that continued use of OHVs and RVs within the Oceano dunes complex violated the Coastal Act, in that the OHV and camping areas were ESHAs under the Act and thus could not be disturbed by non-water dependent uses. The trial court disagreed and dismissed the lawsuit. The Sierra Club appealed, and the Court of Appeal, in a published opinion, affirmed the trial court decision and found in favor of State Parks. The Court of Appeal decision is important because it held that the 1982 CDP incorporated and allowed long-standing OHV use in the dunes. In addition, the Court of Appeal determined that the time to challenge the 1982 CDP had long since passed and the permit could not be attacked now. (*Sierra Club v. Department of Parks & Recreation* (2012) 202 Cal.App.4th 735, 742-743.) In other words, the uses allowed in the 1982 CDP – even if they arguably conflict with certain provisions of the Coastal Act – cannot be undone now, at least not without the consent or acquiescence of State Parks.

- July 9, 2020 Cease and Desist Order from Executive Director of Commission

Over the past few years, the Commission has held public hearings (usually in July) regarding OHV use at ODSVRA. These hearings typically involve hundreds of people coming to the podium either to proclaim their love of OHV use at Oceano Dunes or to curse State Parks (and, by

extension, the Commission) for allowing such barbaric activities to continue. It is a painful process to experience, especially for State Parks, which is usually depicted as the agent of all things evil. Nevertheless, the Commission has always stopped short of closing down the ODSVRA or prohibiting OHV use in the dunes. The reason for this restraint is not that the Commission wants to see OHV use continue at the ODSVRA. On the contrary, the Commission would love to put a stop to such use. However, the ODSVRA was created by legislative action, which protects it from the Commission's efforts to kill it outright. In addition, the 1982 CDP is still in place, and it allows OHV use, despite the Commission's current desire to ban OHVs and RV camping in the dunes. The only way to effectively eliminate OHV use from the ODSVRA is to convince State Parks to do it on its own. That's where the PWP comes in.

But before addressing the PWP – the text of which has yet to be released to the public – it is important to realize that the Commission has already taken steps to bypass the 1982 CDP and impose rigid restrictions on OHV use. On July 9, 2020, the Commission's Executive Director, Jack Ainsworth, issued a Cease and Desist Order to State Parks (to which State Parks consented), directing Parks to halt efforts to scratch out plover and tern nests that had popped up in the open riding areas during the COVID-19 closures this passed spring. But the Cease and Desist Order does not stop there. It also demands that State Parks halt all efforts to prepare ODSVRA for the planned reopening of the park to RV camping and OHV use. According to the Cease and Desist Order, the Executive Director has determined that vehicle-related uses are fundamentally inconsistent with the Coastal Act mandate to protect ESHAs, of which ODSVRA is one. This position, however, is clearly at odds with the 1982 CDP and the 2012 Court of Appeals decision in *Sierra Club v. California Department of Parks and Recreation.*

- <u>The PWP and Possible Forfeiture of Existing OHV Use Rights</u>

In 2019, the Commission pressured State Parks into preparing a Public Works Plan or PWP to establish allowable uses at ODSVRA. According to the Commission, final approval of the PWP would relieve State Parks of the awful chore of being dragged before the Commission each summer for a public bloodletting. More importantly, the PWP, once approved, would effectively supersede the 1982 CDP and its non-conforming uses (i.e., OHV activities in the dunes).

Generally, when a landowner with preexisting non-conforming uses asks the supervising land use agency (e.g., the County or City) for a permit of some kind, the agency, as a condition of issuing the permit requested, will require that all non-conforming uses be terminated. My fear is that the Commission, in exchange for approving the PWP, will demand that the plan delete OHV use and RV camping, claiming both are illegal intrusions into the ESHA in violation of the Coastal Act. If State Parks allows this to happen, and if the PWP is approved by the Commission without an express reservation of OHV use rights, those rights will be forfeited, likely forever.

Conclusion

The PWP sounds benign enough. It is, after all, a standard land use planning tool under the Coastal Act. In the context of the ODSVRA, however, it is a Trojan horse with the potential to destroy OHV use and RV camping at Oceano Dunes. The Commission has figured out that it can only achieve so much by huffing and puffing and making threats. It needs State Parks to finish the job. By submitting to the PWP approval process, State Parks may be giving to the Commission what it could never take by force.

FW: Confronting the Truth at the Oceano Dunes

Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>

Wed 2/3/2021 5:22 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: bill house <pirate805@gmail.com>
Date: Wednesday, February 3, 2021 at 9:20 AM
To: Craig, Susan@Coastal <Susan.Craig@coastal.ca.gov>, Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>, Caryl.hart@coastal.ca.go <Caryl.hart@coastal.ca.go>, Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>, Rice, Katie@Coastal <katie.rice@coastal.ca.gov>, LindaKatie.Rice@coastal.ca.gov <LindaKatie.Rice@coastal.ca.gov>, Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>, Groom, Carole@Coastal <carole.groom@coastal.ca.gov>, Mann, Zahirah@Coastal <zahirah.mann@coastal.ca.gov>, Belinda.fastinos@coastal.ca.gov <Belinda.fastinos@coastal.ca.gov>, Luce, Shelley@Coastal <shelley.luce@coastal.ca.gov>, Morales, Maricela@Coastal <Maricela.Morales@coastal.ca.gov>, Ward, Christopher@Coastal <Christopher.Ward@coastal.ca.gov>
Subject: Confronting the Truth at the Oceano Dunes

With a recall election coming we need to display strong leadership and resolve at the Oceano Dunes. These same groups that want a recall are at work opposing the compromise recommendations at the Oceano Dunes. Other individuals within the OHV division continue to undermine the current Administration and the chain of command at State Parks to promote their own self interests, maintain control, protect their jobs and use the park to profit a few select businesses that help them achieve their goals . Misuse of taxpayers funds, conflicts of interest, broken agreements, violations of the law, environmental harm, strategic delays, bad faith extensions, discriminatory polices and practices, using misleading reports, rejecting science, creating sacrifice zones with disposable people, poor air quality, poverty and environmental injustices are all part of the forty year legacy at the Oceano Dunes. The only thing worse than this legacy is to allow it to continue for one more day.

We need to hold the OHV Division and these groups accountable for their actions, behavior and their big lie propaganda. If we can develop a covid vaccine in less than a year, we can certainly limit vehicles to between Grand and Pier in the first 100 days. I think you will be surprised how quickly things will change with a new conditional use permit. The other option is business as usual, more nuisance lawsuits, attacks on government agencies and officals, environmental injustices, and increased empowerment to expand their vision and political beliefs unchecked. A five year transition becomes no more than a countdown to the next deadline and battle.It does not solve the problems and will be seen as a victory for the delay, deny, distract, deflect strategy. As we fight for clean air, public health, civil rights and the environment they fight to survive and win. They simply outlast and wear down their opponents using any means possible.

At some point all of us need to stand up to these factions that are causing so much harm at the Oceano Dunes, in our State and the Nation. We have all seen what happens when we remain silent and do nothing. If we do not confront and understand the dynamics at work here, we will surely fail. Is this the outcome we want for the Oceano Dunes?

10.30.2020

Oso Flaco

Sue Shields <irishshields@gmail.com>

Wed 2/3/2021 12:47 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Please consider no future expansion of off road access to the dunes and consider phasing out all off road access

--

Sue Shields

512 789-7763

****

The future of the Oceano Dunes

sunbuggierentals@aol.com <sunbuggierentals@aol.com>

Wed 2/3/2021 12:01 AM

To: Miggins, Sarah@Parks <Sarah.Miggins@parks.ca.gov>
Cc: Office of the Secretary CNRA <secretary@resources.ca.gov>; Pearce, Kevin@Parks <Kevin.Pearce@parks.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; info@oceanodunespwp.com <info@oceanodunespwp.com>; OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; Ketterer, Brian@Parks <Brian.Ketterer@parks.ca.gov>; charobolanos@aol.com <charobolanos@aol.com>; mitch@sunbuggyfunrentals.com <mitch@sunbuggyfunrentals.com>; zack@sunbuggyfunrentals.com <zack@sunbuggyfunrentals.com>

1 attachments (1 MB)

Tram!.jpg;

Dear Deputy Director Miggins,

I have not yet verified the balance of the discussion of the Oceano Dunes SVRA vendors' meeting with Mr Pearce on January 7, 2021, and as such, said information is not contained in this correspondence.

I have however had the opportunity to review various documents regarding the future of the Oceano Dunes SVRA. It would appear that the foresight of the composers of the Pismo State Beach and Pismo Dunes SVRA General Development Plan in 1975 had accurate vision regarding the Park, which calls for a dune buggy rental operation.

At the inception of the Sun Buggie rental business, we produced a low impact, 25 MPH, 24 horsepower Dune Buggie, that proved over the span of our rentals at Oceano to be the safest, low speed, low impact OHV ever offered to the general public as a rental.

The composers of the Plan also described a vehicle which did not exist at the time, and which my family/staff and I designed and produced, in the reflection of the 1975 Plan. These vehicles are the Sun Buggie Trams. (**Tram!.jpg**)

Would the forefathers' vision of this vehicle, operated as a ride in the Park with a top speed of 15 MPH, not be the most logical means of permitting the general public non-destructive access to this offroad wonderland?

Please keep in mind that the Sun Buggie Trams have transported over 500,000 people on the beach, without a single incident, generating thousands of dollars for the Christopher Meadows Memorial Fund, as well as funds for the Friends of Oceano Dunes.

Thank you for considering the Sun Buggie Tram.

Sincerely

Randy Jordan
Sun Buggie Fun Rentals

The Mesa Refinery Watch Group



Newsletter: February 1, 2021

Why MRWG Continues To Publish This Newsletter ...

For four years we fought to stop Phillip 66 from bringing crude oil trains via Union Pacific into California to a proposed rail terminal at its Nipomo Mesa/Santa Maria Refinery in SLO County. Victory was achieved in 2017 as the county rejected the plan. In 2020, due to market conditions, P66 announced it would close its refinery in 2023.

We will continue to monitor and report on the closure and related outcomes, helping ensure it is done responsibly regarding health, safety and the environment. If issues arise, we will advise you about actions that need to be taken.

We will also continue to report on the dangers of crude-by-rail and truck, oil refineries, etc. "Knowledge is power", and staying aware will help protect our communities.

To unsubscribe, please send an email to sfdubow@charter.net.

Copyrighted © 2021, Mesa Refinery Watch Group • www.mesarefinerywatch.com
All rights reserved, including reproduction of this newsletter in whole or in part.

CONTENTS

DON'T HAVE TIME TO READ IT ALL?

First Download This Document To Your Desktop.
Determine The Content That Interests You; Then Click On The Red Page Numbers

---

	Page
• Why MRWG Continues To Publish This Newsletter	1
A. What's NEW That You Need To Know	
1. Congratulations To Our New VP Kamala Harris Who Aided Our Efforts To Defeat Crude-By-Rail	3
2. P66 Isn't Alone In Closing And Converting Oil Refineries. The Entire Industry Is Facing An "Adapt Or Die" Dilemma.	4
3. P66 Following Through On Plans For Reconstruction Of Its Bay Area Refinery	5
4. P66 Executive Appointed To APCD Hearing Board, Raising Concerns About Conflicts Of Interest	5
5. CA State Parks' "Public Works Plan" Assailed	6
6. Oil Activities In Cat Canyon Impacted By The Closing Of P66's Nipomo Mesa Refinery	6
7. It's Back To The Future With Crude Oil Rail Tankers. The NTSB Is Still Figuring Out How To Deal With The Old, Fragile, "DOT-111" Cars.	7
8. Oil Train Headed To A P66 Refinery Derails, Igniting Huge Blaze ... Terrorism Being Investigated	8
9. Terror Attacks Against BNSF Railroad In Washington State	9
10. Dramatic Video Captures Rail Tankers Demolishing One Another	9
11. It's Non-Stop -- Serious Railroad & Oil Industry Safety Problems	10 - 13
B. A Synopsis Of What Occurred During The Battle To Stop Phillip 66's Crude-By-Rail Plan For California	14
C. MRWG Steering Committee Members; Logistics Of This Newsletter	15

A. WHAT'S NEW THAT YOU NEED TO KNOW

1. Congratulations To Our New Vice President Kamala Harris Who Aided Our Efforts To Defeat Crude-By-Rail

When we fought Phillips 66's attempt to bring crude oil trains to the Nipomo Mesa, both the oil company and Union Pacific hid behind the concept of **Federal "preemption"** ... i.e., that **local governments** could not stop oil trains from coming here because trains are federally-regulated.

But in 2016, California Attorney General Kamala Harris stepped in. In a written statement, she made it clear that local governments had not only the right to object to oil trains, but the **obligation** to take a strong stand to protect their communities. She wrote ...

> **"These rail shipments will have adverse impacts on air quality and the potential for an accident causing death or severe personal injury. California law requires (a local government) agency to analyze and disclose the full scope of the project's impacts. For (governments) to turn a blind eye to the most serious of the impacts, merely because they flow from federally-regulated rail operations, would be contrary to both state and federal law."**
>
> **"(An oil company's) assertion that (local government) action is illegal, is without merit."**

That statement validated SLO County's Environmental Impact Report, which identified **ten Class I significant and unavoidable impacts** from the P66 rail plan. It helped give citizens and local government agencies the confidence, momentum and legal grounds to stand up to the huge corporations we faced.

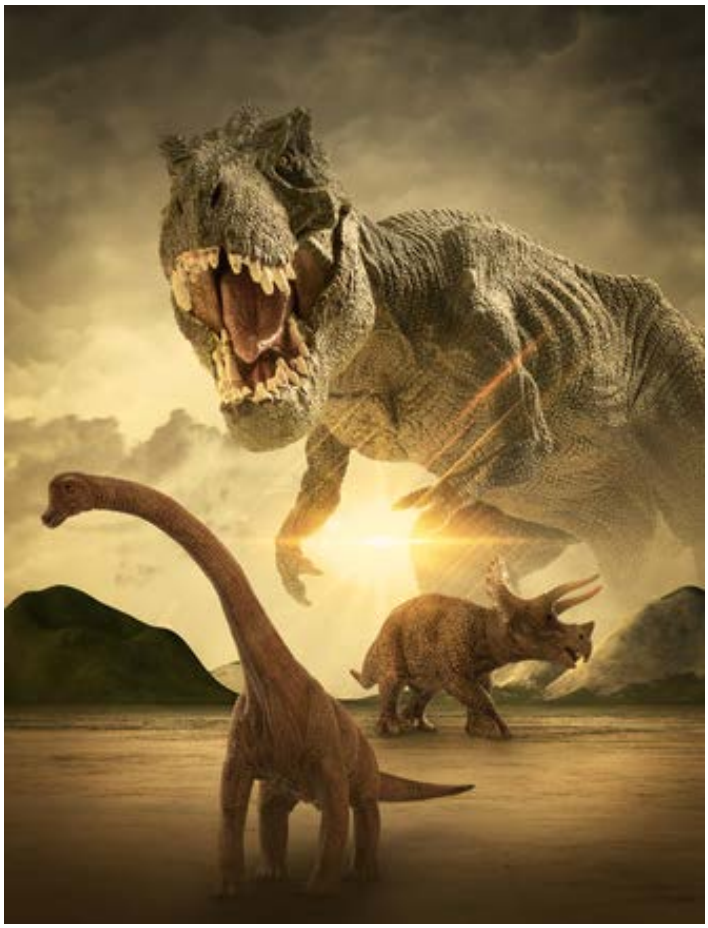


Also - "Harris **filed lawsuits against P66** for alleged environmental violations. (And) her office secured indictments against Plains All American Pipeline for a 2015 spill in Santa Barbara, which resulted in convictions."

Thank you Vice President Harris.
Your timely stance on the issue of crude-by-rail contributed greatly to the health, safety and quality of life for millions of Californians.

https:/www.mesarefinerywatch.coom/letters.html - read "Attorney General's Statement - 4.14.16"
https://www.theguardian.com/commentisfree/2020/aug/11/kamala-harris-joe-biden-vice-president-pence-trump
https://www.rigzone.com/news/wire/biden_vp_pick_has_record_of_fighting_oil_industry-12-aug-2020-162999-article/

2. P66 Isn't Alone In Closing And Converting Oil Refineries. The Entire Industry Is Facing An "Adapt Or Die" Dilemma.



Our last newsletter reported the dramatic news that, in 2023, P66 will close and dismantle its refinery on the Nipomo Mesa in Arroyo Grande.

The plant semi-refines crude oil which is then sent via pipeline to a sister plant in Rodeo, CA. However, the Rodeo refinery will no longer be using crude oil as feedstock. It will be re-engineered to use cooking oil, fats, greases and soybean oils to produce "biofuels." The result - **the Nipomo Mesa refinery will be obsolete** and no longer needed by Phillips 66.

Such actions are part of a wider, trend. According to *Reuters* - "**European and U.S. oil refineries face a wave of closures** due to plateauing fuel demand, tightening environmental rules and overseas competition, prompting some owners to opt for an alternative - converting plants to produce biofuels. The coronavirus epidemic crushed global oil demand. Some producers say it might never recover to pre-crisis levels, (and) **the need to close refineries has accelerated**.

"Shutting refineries is a costly process which requires dismantling equipment and pipelines and remediating the land. So (some) owners are choosing **alternative** paths ... in many cases, switching to cleaner biofuels." "In fact, there is such a rush on used cooking oils and animal fats that some renewable refineries (are) **having trouble** procuring these once worthless feedstocks."

Here in California, in addition to the P66 announcements, Marathon Petroleum has applied to convert its idled Martinez refinery into a renewable diesel facility, using animal fat, soybean oil and corn oil. Marathon also announced employee reductions at other U.S. facilities. Shell is closing a refinery near New Orleans. And, "Phillips shut its (Louisiana) Alliance refinery down in the runup to Hurricane Sally, but just left it shut while it waits for better days."

As the media outlet *OilPrice.com* describes, it's now time for the industry to **"adapt or die."** P66's Nipomo Mesa refinery has been caught in that predicament.

https://www.sanluisobispo.com/news/local/article244933062.html
https://uk.reuters.com/article/uk-europe-refining/facing-wave-of-closures-oil-refiners-turn-to-biofuels-idUKKBN2741B3
https://finance.yahoo.com/news/marathon-seeks-permission-undertake-renewable-140202932.html
https://www.rigzone.com/news/shell_refinery_closure_reflects_industry_trend-15-nov-2020-163855-article/
https://oilprice.com/Energy/Energy-General/Adapt-Or-Die-Refiners-Face-An-Impossible-Decision.html
https://oilprice.com/Energy/Energy-General/Why-Refineries-Are-Fighting-Over-Used-Cooking-Oil.html
https://oilprice.com/Energy/Energy-General/The-Oil-Refinery-Crisis-Will-Worsen-This-Winter.html

3. P66 Following Through On Plans For Reconstruction Of Its Bay Area Refinery



In August 2020, P66 announced the reengineering of its Rodeo refinery and the resulting closure of its Nipomo plant. There hasn't been much related news since then. However, P66 recently released its 2021 capital budget ($1.7 billion). That report describes **a new investment to move forward with the above plan**.

"The Refining budget includes **pre-construction engineering and design costs** related to the plans to reconfigure its San Francisco Refinery in Rodeo, California, to produce renewable fuels. Upon completion in early 2024, the facility would have over 800 million gallons per year of renewable fuel production capacity, making it one of the world's largest facilities of its kind."

https://finance.yahoo.com/news/phillips-66-announces-2021-capital-120000106.html

---

4. P66 Executive Appointed To APCD Hearing Board, Raising Concerns About Conflicts Of Interest



New Times - "**For two decades, Cal Poly environmental engineering professor/Ph.D** Yarrow Nelson has served as a member of the SLO County Air Pollution Control District's hearing board. According to state law, (the position is) supposed to be reserved for a registered professional engineer, but (Nelson) does not have (the specific, required license)."

Last October, by a 6 - 5 vote, the APCD board of directors decided not to extend Nelson's tenure. Instead, they appointed **Jim Anderson, Maintenance Superintendent of P66's refinery** on the Nipomo Mesa to the post. Anderson had previously been Nelson's alternate on the hearing board. "His appointment is stirring up concerns about how he'll handle matters related to Phillips 66, which is regulated by the APCD and contributes to pollution in SLO County."

Jimmy Paulding, Arroyo Grande Councilmember and APCD board member, didn't support the appointment. He remarked - "It's a classic case of **putting the fox in charge of guarding the henhouse**." Paulding stated that Anderson would have to recuse himself from voting on APCD issues involving P66. This would include a potential deal where State Parks might acquire land based on closure of P66's plant.

"Anderson said he understands the concerns about his work with Phillips 66, and if any matters related to Phillips 66 do come before the hearing board, ***'I would recuse myself.'***" We shall see.

https://www.newtimesslo.com/sanluisobispo/phillips-66-refinery-employee-appointed-to-apcd-hearing-board-in-6-5-vote-leading-to-concerns-about-potential-conflict-of-interest/Content?oid=10197244

5. CA State Parks' "Public Works Plan" Assailed



One argument against P66's crude-by-rail plan was the **additional air pollution** it would have brought to the Nipomo Mesa (already suffering from poor air quality due to dunes dust produced by ATVs). Now a new Public Works Plan **(https://tinyurl.com/y3lg2hfq)** has been criticized.

"Local groups have long blamed off-roading for the SVRA's poor air quality. (They) say State Parks has once again failed to adequately address the complex issues. 'The message is, **well we can't tell you exactly how we're going to fix all these problems but trust us**'" said a spokesperson for the Center for Biological Diversity. State Parks indicated that phasing out the off-road vehicles "is not (financially) feasible."

In addition, the plan calls for a new southern park entrance to the dunes, crossing the P66 refinery property if can be purchased.

Public comments must be sent by March 2nd to **OceanoDunes.PWP.EIR@parks.ca.gov**.

https://www.newtimesslo.com/sanluisobispo/conservationists-criticize-state-parks-plan-for-future-of-oceano-dunes/Content?oid=10476027

---

6. Oil Activities In Cat Canyon Impacted By The Closing Of P66's Nipomo Mesa Refinery



Cat Canyon Resources (formerly known as ERG Resources and also Terracore Operating Co.) "had sought approval to develop 233 steam injection wells" in Santa Barbara's Cat Canyon.

But in November the company "voluntarily withdrew its application, **becoming the third of three companies** to cancel major plans for the area." The company will retain 499 active and/or idled wells in the canyon.

Reasons for the withdrawal likely include the upcoming closure of P66's Nipomo Mesa refinery, and the long-standing opposition of environmental groups to the additional wells. Earlier in 2020, "Aera Energy and PetroRock also withdrew applications for more drilling in Cat Canyon."

However, Cat Canyon Resources "will move forward with plans to **add a short stretch of pipeline** (known as the Foxen Pipeline) to replace the trucking of crude. The 2.9-mile pipe will tap into an existing pipeline headed for Phillips 66's Nipomo Mesa (refinery), which is due to shut down in 2023."

https://tinyurl.com/y52xlsok • https://www.independent.com/2020/11/13/pipeline-project-forges-on-despite-pending-closure-of-destination-refinery

7. It's Back To The Future With Crude Oil Rail Tankers.
The NTSB Is Still Figuring Out How To Deal With The Old, Fragile, "DOT-111" Cars.



In 2015 the National Transportation Safety Board **knew how dangerous DOT-111 oil tankers were**. They had crashed and burned in major accidents (including the Lac-Megantic, Quebec disaster which killed 47 people; see above photo).

But then a new and improved tanker was announced - the DOT-117. When it reached the rails it would "adopt the most demanding technical requirements" to prevent the breaching of tankers. **That was to be the future of safer crude-by-rail**.

Now it's 2021, but it's **back** to the future. In December '20 the NTSB issued **new safety guidelines for the use of the ancient DOT-111s!** Those cars are still operating and responsible for breaches and fires. The "recommendations" call for five non-oil tanker cars to be placed between locomotives and the DOT-111 cars to protect train crews during crashes.

The recommendations were issued based on two recent accidents (one involving Union Pacific) in which the positioning of the DOT-111s "increased the risk of derailment and breaking of the tank cars, resulting in release of hazardous materials."

The NTSB stated -"It is imperative these recommendations be implemented to **prevent a catastrophic event**."

It's of course alarming and depressing to know that after all this time, actions are being taken to only slightly **minimize** the impacts of DOT-111 derailments, rather than **avert** them entirely.

https://www.progressiverailroading.com/safety/news/NTSB-calls-for-tank-car-placement-to-mitigate-hazmat-train-risks--62271
https://www.railwayage.com/regulatory/dot-117-defined/
https://www.cbc.ca/news/canada/crude-oil-shipments-tanker-punctures-top-of-agenda-at-rail-talks-1.2491949

8. Oil Train Headed To A P66 Refinery Derails Igniting Huge Blaze ... Terrorism Being Investigated

Dec. 22, 2020; Custer, Washington:

A 108-car BNSF crude oil train was heading from North Dakota to the **Phillips 66 refinery** in Ferndale, Washington. **Bakken crude**, an extremely dangerous cargo, was onboard.

(Bakken was one of the crude oils P66 considered shipping to its proposed rail terminal on California's Nipomo Mesa. It later backed down and switched the potential cargo to tar sands oil.)

"Seven cars derailed and (two) caught fire, sending a large black plume of smoke into the sky."

Streets were closed and **half-mile evacuation orders issued due to the toxicity of the smoke**. Interstate 5 was closed in both directions.

The blaze continued throughout the afternoon as responders allowed it to burn out. The cause - authorities are investigating **a potential act of terror** (see next article).

A local congressman remarked: "I worked closely with the Obama administration to make the transport of oil by rail safer. **Clearly there may be more work to do**."







https://www.washingtonpost.com/business/train-cars-carrying-crude-oil-derail-burn-north-of-seattle/2020/12/22/8042b982-44bb-11eb-ac2a-3ac0f2b8ceeb_story.html
https://kcby.com/news/local/train-derailment-prompts-evacuation-order-in-whatcom-county
https://www.bellinghamherald.com/news/local/article248035100.html. https://www.opb.org/article/2020/12/23/oil-train-derails-whatcom-county-washington/
https://www.oregonlive.com/business/2020/12/fiery-oil-train-crash-was-near-where-two-arrested-accused-of-attempted-terrorist-attack-on-tracks-feds-investigate.html

9. Terror Attacks Against BNSF Railroad In Washington State



November, 2020 -- two women "**were arrested and charged with terrorist attacks and violence against railroad carriers**. Both appeared in Federal District Court."

Photo surveillance and a police investigation indicated the women were trespassing on BNSF tracks. They claimed they were looking for car keys.

"Since January '20 there have been **41 cases of shunts placed on the tracks** in Washington. The placement of shunts have created crossing guard malfunctions, braking system interference and **almost derailed a train carrying hazardous materials**. On at least 10 occasions, shunts were placed where track and streets intersected, which put vehicles at risk."

"Shunts consist of **a wire strung across the tracks**, mimicking the electrical signal of a train. The devices can cause trains to automatically brake and disable railroad crossing guards."

In October, a train carrying hazmat materials braked prior to hitting shunts on tracks. The emergency braking caused the locomotive and cars to become separated. Investigations are ongoing into who is behind the attacks.

https://www.rtands.com/rail-news/group-using-shunts-in-an-attempt-to-disrupt-derail-trains-in-state-of-washington/
https://bonnercountydailybee.com/news/2020/dec/29/federal-officials-investigate-fiery-oil-train-dera/
https://www.foxnews.com/us/seattle-terrorism-train-track-derailment-anarchist-group

---

10. Dramatic Video Captures Rail Tankers Demolishing One Another



October 29, 2020 -- A Kansas City Southern train derailed in Mauriceville, TX, "causing railcars to pile up on the tracks and spill over onto a nearby roadway." Five tank cars with a "petroleum product" were breached, some leaking on the ground.

People within a mile were evacuated, and those between a mile and a mile-and-a-half were asked to shelter in place.

"A motorist shot video of railcars piling up as they tumbled off the tracks."

Click here to see the video -- https://tinyurl.com/y5ugrbt2.

https://www.cbsnews.com/news/train-derailment-mauriceville-texas-evacuation/

11. It's Non-Stop -- Serious Railroad & Oil Industry Safety Problems (see sources on page 13)

a. Goshen, CA; Nov. 23, 2020:
Hazmat Cars Derail From Union Pacific Train



"A (Union Pacific) train wrecked, leaving a mess of mangled and twisted train cars. (Six tankers) derailed on private and railroad property. 'The train must have been moving at full speed to throw cars in the positions I saw them,' said a police officer."

The tankers contained the hazmat materials hydrochloric acid and butane. Materials leaked from one or more tankers. Two hazmat teams were on the scene. The major Highway 99 was closed in both directions. The cause was under investigation.

---

b. Polk County, Iowa;
Dec. 25, 2020:
Bridge Fails, Derailing
Union Pacific Freight Cars



A small bridge over a "waterway gateway" collapsed on Christmas morning, resulting in the derailment of 20 - 25 cars on a UP train. "Two cars of octane were leaking after the derailment, bringing hazardous-material teams to the site to contain the leak."

Nearby streets were closed for 10 hours. The cause is under investigation.

---

c. Dixon, IL; Dec. 24, 2020:
Union Pacific Train Derails,
Leaking Fuel And Acid



Thirty-nine cars on a Union Pacific train came off the tracks, spilling diesel fuel and sulfuric acid. "The spillage was contained and the Illinois Environmental Protection Agency is on the scene. The cause of the derailment is under investigation."

d. Canby, OR; Jan. 6, 2021: Union Pacific Train Slams Into Tree



"A Union Pacific train carrying lumber derailed after colliding with a large tree that had fallen on the tracks. Three locomotives and 15 rail cars derailed.

"The engineer of the train complained of pain but no one else was injured." Heavy equipment was brought in to clean up the debris.

---

e. Gary, IN; Dec. 23, 2020: Rail Cars "Fly" Off The Tracks Next To A Highway



Norfolk Southern said 20 cars came off the tracks when the train with two locomotives hauling 132 rail cars derailed. The accident "left train wheels strewn along the tracks with cars tipped over and smashed."

"The train included tank cars marked with hazardous materials placards. None of the cars appeared to have sustained damage."

---

f. Wallins Creek, KY; Dec. 17, 2020: Rockslide Causes Train Derailment



A rockslide that included a massive bolder caused a CSX train to derail. The rocks first blocked a highway and then the tracks below.

Two locomotives and eight loaded coal cars derailed, almost crashing into a nearby home.

g. Richmond, CA; Oct. 24, 2020: Gasoline Tanker Fire Prompts Shelter In Place



A motorcyclist lost control and their bike wound up under a gasoline tanker on Rt. 80 in Richmond, CA.

Fire ensued, engulfing the double-tanker which was carrying 8,500 gallons of fuel. Plumes of smoke were seen throughout the area. Lanes in both directions were closed. Due to the chemical blaze, residents were asked to shelter in place. Motorists stuck within a half-mile of the accident were told to exit their cars and leave the scene.

---

h. Lilburn, GA; Oct. 11, 2020: Major Train Derailment Ignites Hazmat Fire



Flash flooding from a swollen creek was blamed for 37 CSX cars coming off the tracks. The derailment caused a chemical spill and fire involving several cars and hazardous materials. Two cars had been carrying ethanol. The fire spread to nearby woods. A half-mile evacuation was ordered.

"CSX (was) working with cleanup companies to minimize impact to the environment."

The engineer and conductor were taken to the hospital with minor injuries.

---

i. Roanoke County, VA; Oct. 30, 2020: Coal Cars Plunge Into River



"A Norfolk Southern bridge collapsed causing a train carrying coal to derail ... 22 cars were involved."

The cars and the coal needed to be removed from the Roanoke River. Federal agencies worked to determine whether there were impacts to water quality.

j. Indiana County, PA; Nov. 25, 2020: Train Derails In Bridge Collapse



A coal-carrying Norfolk Southern train was crossing a bridge in western Pennsylvania. It was unclear which happened first, but the train derailed and the bridge collapsed. Five cars left the track and spilled debris. Someone was driving under the span as it came down, but was unharmed.

Replacing the trestle will likely take months.

---

k. Amherst, OH; Dec. 1, 2020: 10 Cars Derail In Winter Snow Storm



During a winter snow and ice storm, 10 cars on a Norfolk Southern train left the tracks. While hazmat materials were on board, none spilled. Five cars spilled grain.

However, "the crashed train cars narrowly missed (by 50 feet) the main electrical feed that provides power to Amherst's 12,000 residents." The mayor remarked - "We really did get lucky. "It would have been a catastrophe to lose power citywide in the middle of a snowstorm."

Sources for the accidents reported above ...

https://fox40.com/news/california-connection/richmond-tanker-fire-prompts-emergency-response/
https://www.radio.com/kcbsradio/news/local/cleanup-underway-after-tanker-truck-fire-stops-i-80
https://www.sfgate.com/bayarea/article/I-80-tanker-fire-traffic-San-Pablo-Richmond-smoke-15672529.php
https://www.sfgate.com/bayarea/article/I-80-tanker-fire-traffic-San-Pablo-Richmond-smoke-15672529.php
https://www.11alive.com/article/news/local/train-derailment-crash-in-lilburn-in-gwinnett-county/85-6860f7e3-e4d0-4549-abe8-4024cb7d7599
https://weather.com/news/news/2020-10-11-hurricane-delta-remnants-train-derails-georgia-flooding-tornado
https://www.wdbj7.com/2020/10/31/train-derails-in-salem-along-barley-drive/
https://www.visaliatimesdelta.com/story/news/2020/11/23/train-cars-mangled-wreck-north-western-milling-highway-99/6390188002/
https://abc30.com/train-derailed-visalia-goshen-state-route-99-closed-highway/8198986
https://www.yourcentralvalley.com/news/train-derailment-shuts-down-highway-99-near-goshen/
https://www.fresnobee.com/news/local/article247369979.html
https://www.rtands.com/rail-news/bridge-collapses-train-derails-in-indiana-county-pa
https://pittsburgh.cbslocal.com/2020/11/25/indiana-county-train-derailment-2/
https://chroniclet.com/news/243429/multiple-fire-departments-called-to-reported-train-derailment-in-amherst/
https://wcyb.com/news/local/rockslide-causes-train-derailment-in-harlan-county-ky
https://www.wate.com/news/kentucky/watch-drone-video-shows-aftermath-of-rock-slide-train-derailment-in-harlan-county/
https://www.desmoinesregister.com/story/news/2020/12/25/polk-county-bridge-collapse-causes-union-pacific-train-derailment/4045025001/
https://trn.trains.com/news/news-wire/2020/12/28-digest-cars-to-be-removed-from-custer-derailment-site-starting-today
https://www.kcrg.com/2020/12/26/20-25-train-cars-derail-after-small-bridge-collapses-in-iowa/
https://www.ctpost.com/news/article/Rail-crews-resume-cleanup-after-NW-Indiana-train-15827031.php
https://abc7chicago.com/gary-train-derailment-norfolk-southern-route-12-closed/9032224/
https://www.wqad.com/article/news/local/train-derails-near-dixon/526-52908c2b-5c4f-48c4-a649-80ebb4d3d19a
https://wrex.com/2020/12/24/authorities-respond-to-a-train-derailment-in-lee-county/
https://www.kgw.com/article/news/local/clackamas-county/union-pacific-train-derails-between-canby-and-oregon-city/283-5708ef97-0242-4232-b166-9de155eef9d2
https://www.koin.com/local/clackamas-county/train-derailment-closes-highway-99-between-canby-oregon-city/

B. SYNOPSIS OF WHAT OCCURRED DURING THE INTENSE, EXTENSIVE BATTLE TO STOP PHILLIPS 66's CRUDE-BY-RAIL PLAN FOR CALIFORNIA ...



In 2013 Phillips 66 proposed changing its business model at their Arroyo Grande, CA refinery on the Nipomo Mesa. After 60 years of receiving California crude oil by relatively safe underground pipelines, they asked San Luis Obispo County for a permit to build a rail terminal to receive cheaper (more profitable), tar sands crude oil from Canada via rail tankers.

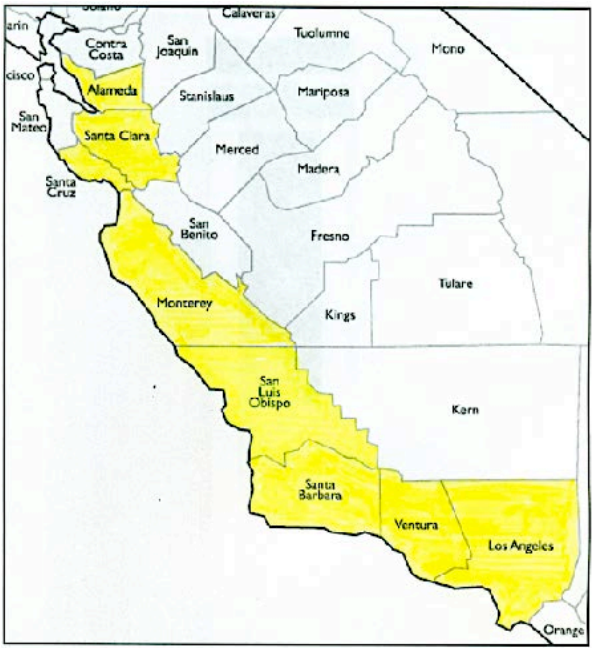
Citizens formed the *Mesa Refinery Watch Group*. We identified the many dangers of "rail" and fought along with other groups opposing the project. It took almost four years, ongoing hearings and testimony at SLO County agencies, as well fending off a Phillips 66 lawsuit. It also required obtaining official opposition from 8 different counties and 28 cities (see map below).

But in October, 2017 it all came to an end when P66 withdrew its lawsuit. The rail terminal would not be built and P66's crude oil trains would not traverse California's counties. P66 has not renewed its application to construct a rail terminal, but we must remain vigilant. In 2020, P66 announced it would close the very same refinery in 2023 due to "changing market conditions."

For a detailed account, go to "History of the Project & the Opposition" -- http://goo.gl/h8Fo9L.

Counties Officially Opposed (see map)

- Alameda County
- Los Angeles County
- Monterey County
- San Luis Obispo County
- Santa Barbara County
- Santa Clara County
- Santa Cruz County
- Ventura County



Cities Officially Opposed

- Berkeley
- Camarillo
- Carpinteria
- Davis
- Emeryville
- Fremont
- Gilroy
- Goleta
- Grover Beach
- Los Angeles
- Mar Vista
- Milpitas
- Moorpark
- Morgan Hill
- Oakland
- Oxnard
- Paso Robles
- Pismo Beach
- Richmond
- Sacramento Area Council of Governments
- San Jose
- San Leandro
- San Luis Obispo
- Santa Barbara
- Santa Cruz
- Santa Margarita
- Simi Valley
- Ventura

C. MRWG STEERING COMMITTEE MEMBERS; LOGISTICS OF THIS NEWSLETTER

1. Mesa Refinery Watch Group Steering Committee:

- Linda Reynolds (Founder): lreynolds151@gmail.com
- Eunice King (Chief Administrator Emeritus)
- Martin Akel: akelassoc@earthlink.net
- John Anderson: johnanderson33@hotmail.com
- Heidi DiSalvo: disalvosh@gmail.com
- Steve DuBow: sfdubow@charter.net
- Gayle Hurlburt (MRWG Website Administrator - www.mesarefinerywatch.com)
- Gary McKible: gary@mckible.com
- Tom Ryan: whitneyhiker888@yahoo.com
- Sam Saltoun: ssaltoun@verizon.net
- Laurance Shinderman: donlorenzo42@gmail.com
- Yvonne Williams: williams.yvonne.e@verizon.net

2. List Coordinator/Newsletter Distributor: If you would like to add names to receive this newsletter, or if you would like to stop receiving it, kindly contact Steve Dubow -- sfdubow@charter.net.

Timeline for the Oceano Dunes

bill house <pirate805@gmail.com>

Tue 2/2/2021 8:24 PM

To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>; info@lairdforcasenate.com <info@lairdforcasenate.com>; OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; CCCA3858@gmail.com <CCCA3858@gmail.com>; Kchristensen22@comcast.net <Kchristensen22@comcast.net>; Abeals@co.slo.ca.us <Abeals@co.slo.ca.us>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; Christie, Sarah@Coastal <Sarah.Christie@coastal.ca.gov>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Tkeith@co.slo.ca.us <Tkeith@co.slo.ca.us>; Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Glimon@caleja.org <Glimon@caleja.org>; Tiffany@caleja.org <Tiffany@caleja.org>; Maricela@causenow.org <Maricela@causenow.org>; Lucas@causenow.org <Lucas@causenow.org>

Just as the Federal Government is taking a new green approach to rebuilding our economy through stimulus funding and new regulations, I believe the Coastal Commission can use the same approach at the Oceano Dunes. By improving the conditional use permit we can help improve air quality, public health, safeguard agricultural workers, protect the environment, reduce adverse and disproportionate impacts and protect environmental justice communities. This is a sweeping reform that brings us into legal compliance and at the same time it preserves driving at the beach and low cost camping. The beauty of the the Coastal Commission compromise recommendations is it is simple, lean, clear, and comprehensive.

I believe we must consider a more robust timeline just like the federal and state government. The philosophy behind a five year transition plan is to give State Parks and a few businesses the opportunity to plan and transition. Unfortunately, over the past year that transition is already taking place. I believe in delaying full implementation immediately we only make it more difficult and it becomes a step backwards. Clearly, looking at the economic data from Pismo Beach from March through October sales tax and the hotel tax revenues increased in 2020 when the Oceano Dunes was closed to vehicles.

Just as important, in the last year we have seen how social, political, economic issues have changed our country. The Oceano Dunes have become over the years a centralized location for many of these groups to meet, recruit, and organize. Their flags and symbols are part of the history and culture at this location. This creates an uncomfortable recreational experience for many people and restricts access. We must never forget.

In summary, I believe the data, transition that is already taking place, changes in our society, reducing harm, mandate for social equity and unique funding opportunities, tells us that a new timeline should be considered at the Oceano Dunes. If we close the Oceano Dunes to vehicles on May 1, 2021, the park will transition quickly to reopen for vehicles, they have done it before. Truthfully, as long as we allow the problem to continue it makes it impossible to begin the healing, restoration and recovery.

#10.30.2020

Draft Public Works Plan Comments for the Commission

Chris Sorensen <cwsorensen99@hotmail.com>

Tue 2/2/2021 10:07 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Rather than resolve the fundamental environmental conflicts cited by the Commission staff 18 months before, the proposed Public Works Plan (PWP) would make them worse. While some of the Commission's specific concerns are addressed, the overall plan would expand OHV activity and its environmental impacts. It is troubling that the worst impacts are not specifically identified in the draft PWP and are not addressed by the Draft Environmental Impact Report published with the draft PWP.

The draft PWP references the ODSVRA Habitat Conservation Plan (HCP), issued separately by State Parks. The draft HCP proposes a reduction in the size of the seasonal shore bird nesting exclusion area and expansion of the riding area. The draft PWP ignores the Coastal Commission recommendation that the exclusion area be permanent, not seasonal.

The dust and beach access concerns expressed by the Oceano Beach community have been paid only lip service. State Parks proposes to make the Pier Avenue permanent, and only promises to sweep Pier Avenue more often and try to control sand track out. The calls for a new vision have been ignored.

Instead, State Parks proposes new camping, RV parking, park operations and OHV recreational facilities at Oso Flaco Lake, and if the land can be acquired, on the existing Phillips refinery property. Both proposals include new access trails to the OHV riding area. The draft PWP largely ignores the potential impacts these major development projects could have on air quality, water quality, noise and local area traffic conditions. The merits of these proposals cannot be fairly judged given the limited information provided by the draft PWP.

Most troubling, if approved by the Coastal Commission, the PWP would essentially give State Parks a blank check to pursue these broadly defined development projects without critical review. The essential role of the Coastal Commission to protect the public interest would be significantly weakened. The devil is in the details.

State Parks has failed to provide a new, more environmentally sensitive vision for the ODSVRA. It has not shown how the SVRA can be made compatible with the Coastal Act. They have failed the local community, as well as the OHV community. The draft PWP demonstrates that State Parks cannot be trusted to do so. That responsibility has again been defaulted to the Coastal Commission.

I urge the Commission to move forward on the staff's recommendations. I also ask the Commission to consider the feasibility of a 5 year phase-out of OHV activity. How would such a plan be implemented? Why not two or three years? Five years would only seem to maintain the status quo longer than necessary for park operations to adapt.

No more excuses, no more delays, act.

Chris Sorensen
Nipomo, California

H: (805) 343-1563
M: (805) 931-1608

Proposed Oso Flaco Development

Stevia Shaw <stevia7655@gmail.com>

Tue 2/2/2021 9:47 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear Oceano Dunes Review Committee,

I am a resident of the Central Coast and have lived here for the past 15 years. I have watched the area become more congested and overrun with tourists who have no interest or care about where they leave trash as long as they can party. This is not their backyard, but it is mine.

I am strongly opposed to the development proposed for added parking and campsites to Oso Flaco. This area already suffers from dune riders who have no interest in preserving our environmental heritage. We have so little as beautiful and accessible as Oso Flaco State Park.

The birds, wildlife and fauna here are so unique, and the plover is endangered. Further development will lead to their continued destruction. Why would you ever think this development might be a good idea?

California already has enough coastal playgrounds without the need to carve out another piece of natural treasure, and trash a very delicate environment.

Please do not let this development proceed. I vote NO.

Sincerely

Stevia Shaw
12708 San Felipe Ct.
Atascadero, CA 93422

“

Hope is the thing with feathers
That perches in the soul
And sings the tune without the words
And never stops at all."

Emily Dickinson

Sent from my iPhone

FW: “lodging revenue in Oceano increasing” during the closure ODSVRA

Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>

Tue 2/2/2021 2:54 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Oceano Beach Community Association <oceanobeachca@gmail.com>
Date: Monday, February 1, 2021 at 7:53 PM
To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>, Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Subject: “lodging revenue in Oceano increasing” during the closure ODSVRA

Dear staff

please read the following material:

According to a new study by a Cal Poly associate professor, the coronavirus-related restriction had “no significant impact” on San Luis Obispo County’s economy.

In fact, Pratish Patel’s study found “lodging revenue in Oceano increasing” during the closure.

https://docs.google.com/document/d/17IFfp4qW7MXbfrodXuhU9F7btSdTSdcFz-gsH-h6tnA/edit
Best,
lucia casalinuovo
Oceano Beach Community Association
oceanobeach.org

Oceano Dunes State Parks

Ed Harris <movieln2@gmail.com>

Tue 2/2/2021 2:31 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I support eliminating OHV use and ultimately all vehicle use at the Oceano Dunes state Park!

It is stressful to walk the beach and hear the rumbling muffler noise coming upon you. We need to eliminate the vehicle noise, beach destruction, grease, oil and gas from the beach environment.

The beach is suppose to be a respite from the hectic pace of life, not a continuation of the 405.

We need to be stewards of our natural environment and give the least turn, snowy plower and grunions a chance to thrive.

A wonderful beach respite will attract people and give the city of Oceano and surrounding area a chance to prosper also.

Ed Harris

Please open Oceano dunes

JACOB VAN SCOTER <jvs4x4@aol.com>

Tue 2/2/2021 4:17 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; Mangat, Lisa@Parks <Lisa.Mangat@parks.ca.gov>; Canfield, Dan@Parks <Dan.Canfield@parks.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; OHV, OHVINFO@Parks <OHVINFO.OHV@parks.ca.gov>

Good evening,

Our family has been going to the Oceano Dunes since the eighties. My dad took us there when i was a kid and I have taken my family ever since my son was 4 months old. It has been heartbreaking that they have been closed since Covid and now you want to phase out our park? A lot of families don't have the money to take fancy trips to Hawaii or Disneyland and you intend to take this low cost option of camping and making great memories around a campfire with family and friends? It's not right and devastating to our kids that they won't have the chance to take their kids as it is a family tradition that we make the trek 3-4 times a year from Gilroy, please reconsider your decisions as this impacts a lot of blue collar working people that only want to spend quality family time around a campfire. Thanks



Jacob Van Scoter



Recar Inc
Action auto wreckers
A-1 Auto Wreckers
Honda Heaven auto dismantlers
San Benito Auto Wreckers
Cell 408-590-6468

On Jun 27, 2019, at 10:12 AM, jvs4x4@aol.com wrote:

Good morning,
i am writing you to please keep our dunes open for our families and future generations to come. Me and our family would be devastated if you were to close our only dunes in California that we have been visiting for over 20 years, my son was 4 months old when we first brought him to Oceano dunes and it is our only family vacation that we get to go to 2-3 times a year since we live 3 1/2 hours away in Gilroy ca.

Sincerely Jacob Van Scoter and family
<WKAH9686[1].JPG>
<WKAH9686[1].JPG>

The Big Lie and the Oceano Dunes State Park

bill house <pirate805@gmail.com>

Sun 1/31/2021 4:52 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; info@lairdforcasenate.com <info@lairdforcasenate.com>; Chinook.shin@sen.ca.gov <Chinook.shin@sen.ca.gov>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; CCCA3858@gmail.com <CCCA3858@gmail.com>; Abeals@co.slo.ca.us <Abeals@co.slo.ca.us>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>; Tkeith@co.slo.ca.us <Tkeith@co.slo.ca.us>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Kchristensen22@comcast.net <Kchristensen22@comcast.net>; Christie, Sarah@Coastal <Sarah.Christie@coastal.ca.gov>; Hharmon@slocity.org <Hharmon@slocity.org>; Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Maricela@causenow.org <Maricela@causenow.org>; Glimon@caleja.org <Glimon@caleja.org>

At the Oceano Dunes State Park we can define the big lie as, "a distortion or misrepresentation of the facts, especially when used as a propaganda device by individuals or groups." The Oceano Dunes is a place where distorting and deflecting the truth to confuse and then creating a false narrative have become part of the institutional history and culture of the OHV division, special interest groups, and a few individuals that use the park for profit. These groups blame everything on the Coastal Commission, Air Quality District, elitist Trilogy, Environmental groups, they never will admit they are doing anything wrong. What I find so interesting is they have been telling the big lies for so long about the Oceano Dunes that they actually believe some of these lies . This is what happens when we all remain silent and do nothing.

I have been waiting for a long time and preparing for a debate on the issues, facts and science at the Oceano Dunes State Park so we can discuss the merits of Air Quality, Public Health, the Environment, Poverty, Disproportionate Impacts, Systemic Racism, the Rule of Law, Environmental Justice and Equality, and the truth. I have come to realize through delays, broken agreements, bad faith extensions, strategic political silence that this debate will never happen. How do you debate living in the past, big wind fences, misinformation campaigns, false economic armageddon predictions, developing the PWP on a dining table and groups who use each other for political, economic, or job protection and when all else fails they wrap themselves in the flag, family, then claim to be the victims.

In March, we have the opportunity to adopt a new conditional use permit that can begin to place the mistakes of the past behind us, and then move forward with a creative compromise plan with the Coastal Commission partnering with State Parks, and working with environmental groups, local agencies and communities to build a transformative paradigm that can become an environmental justice model program for our State. Waiting years to implement important elements of this plan will only weaken its impact, effectiveness and needlessly cause more harm. Immediately closing Pier Avenue in Oceano and providing a safe beach access zone sends a clear powerful action statement that it is not going to be business as usual at the Oceano Dunes State Park. I hope my thoughts as a resident will be helpful in the planning process and I will continue to support the the Coastal Commission compromise recommendations for the Oceano Dunes State Park.

#10.30.2020

Oceano Dunes HCP

Luise Gleason <luise.gleason@yahoo.com>

Sat 1/30/2021 9:37 PM

To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; oceanodunes.pwp.eir@parks.ca.gov <oceanodunes.pwp.eir@parks.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Crowfoot, Wade@CNRA <Wade.Crowfoot@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>; Miggins, Sarah@Parks <Sarah.Miggins@parks.ca.gov>; McGuirk, Liz@Parks <Liz.McGuirk@parks.ca.gov>; Bayne, Scott@Parks <Scott.Bayne@parks.ca.gov>; Yankee, Stacey@Parks <Stacey.Yankee@parks.ca.gov>; Amann, Kathleen@Parks <Kathleen.Amann@parks.ca.gov>; Chamberlin, Jay@Parks <Jay.Chamberlin@parks.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Bod@oceanodunes.org <Bod@oceanodunes.org>; Lynch, Tara@Parks <Tara.Lynch@parks.ca.gov>; Tobias, Kathryn@Parks <Kathryn.Tobias@parks.ca.gov>; info@slocleanair.org <info@slocleanair.org>; gwilley@co.slo.ca.us <gwilley@co.slo.ca.us>; Office of the Secretary CNRA <secretary@resources.ca.gov>; Canfield, Dan@Parks <Dan.Canfield@parks.ca.gov>

To Whom It May Concern:

My name is Luise Gleason and I am a resident of the city of Arroyo Grande, California. I am contacting you because I am concerned about reopening Pismo State Beach and Oceano Dunes to vehicles and kindly request that the issuance of an incidental take permit (ITP) to the California Department of Parks and Recreation (CDPR) is **not** granted.

Everybody knows that wildlife is easily disturbed by people. Both Pismo State Beach and Oceano Dunes provide a habitat for endangered and threatened species that are protected by the federal Endangered Species Act. This includes four animal and six plant species, including the western snowy plover - one of North America's most threatened shorebirds. From March to October, the western snowy plover nests on the sands of the Oceano Dunes SVRA and feeds along Pismo State Beach. According to the Center for Biological Diversity which has now filed a lawsuit against the CDPR, nesting areas expanded when the park was closed to vehicles during the pandemic. Many of these nests appeared outside the fenced enclosure that the CDPR maintains.

It is well-known that off-road vehicles degrade natural capital on all terrestrial ecosystems. Oceano Dunes and Pismo State Beach are no exception. The CDPR's three-phased reopening plan states that “drivers are being asked to drive with care and provide shorebirds and pedestrians plenty of space” but the CDPR's website notes that shorebirds “often crouch in small depressions in the sand, which make them very well camouflaged and extremely hard to see.” If a shorebird and its nest are difficult to identify on foot, how will a person in a faster moving vehicle be able to do so? Especially now during the winter months, these birds are particularly vulnerable because they are inactive.

I understand that the CDPR applied for an ITP to continue public activities, but allowing motorized recreation to return to Oceano Dunes is not only a threat to wildlife, but to humans as well. During the CDPR's Public Comment Meeting on May 13, 2020, the Oceano Dunes District's Habitat Conservation Plan was defined as supporting the mission to protect biodiversity and resources while also allowing high-quality recreation. If I may ask, what is defined as “high-quality recreation”? I consider other activities offered by the Oceano Dunes SVRA like swimming, surfing fishing, camping and hiking to meet this criteria, but not off-roading. In June 2019, the SLO Tribune described vehicle activities at Oceano Dunes SVRA as “inherently dangerous” and reported that more than 40 people have died since 1992.

Safety measures during COVID-19 should have shown us that Oceano Dunes and Pismo State Beach still provide plenty of meaningful recreational activities without vehicular access. Especially residents of the Five Cities have enjoyed the quieter conditions around this outdoor space and it is therefore understandable that the community is now gathering to contest the reopening to vehicles.

Our Central Coast offers so much natural beauty. Instead of letting rubber tires run over our state birds and unique plant species, we could invest into additional, more low-impact activities like educational hikes to show the natural resource management, bird watching, photography tours or other on-foot opportunities. Ecotourism like this would not only sustain San Luis Obispo County's fragile environment but also inspire people to be sensitive towards and appreciate of local and natural areas wherever they may go. Most importantly, it would sustain our precious landscapes for future generations and ensure that they as well will be able to enjoy what we have now.

Sincerely,
Luise Gleason



ECONOMIC IMPACT FROM SUSPENSION OF THE VEHICULAR USE AT THE OCEANO-DUNES SVRA

Pratish Anilkumar Patel
Associate Professor
Finance Department
California Polytechnic State University
San Luis Obispo
ppatel29@calpoly.edu

ABSTRACT

On March 28, 2020, the California State Parks suspended vehicles at the Oceano Dunes SVRA. In this report, I analyze the suspension's economic impact for the San Luis Obispo County (County). Before the suspension, prior studies, using a survey-based approach, claimed that the vehicular use is pivotal to the county's economy. A survey-based approach indirectly measures the impact and suffers from selection bias. For example, if most responders are vehicle users, then the approach overstates the impact. I use an alternative approach. Using a Difference in Difference (DiD) approach, I claim that the suspension had a minimum impact on the Transit Oriented Tax (TOT) and County's unemployed. By using location data, I find that time spent at County's parks follows a similar pattern as nearby counties. Using small business revenue data, I find that the County's revenue decline pattern was similar to other nearby counties. That is, the suspension did not disproportionately affect the County. Overall, contrary to the implications from previous studies, I do not find a significant decline in economic impact from the suspension.

Table of Contents

List of Figures iii

Executive Summary 1

Background 1

Summary of Research Methods 4

Main Findings 6

Circumstantial Evidence 6

Smoking Gun Evidence 6

Analysis 7

Circumstantial Evidence involving Google Trends Data 7

Circumstantial Evidence involving Google's time use data 10

Circumstantial Evidence involving Womply's small business data 12

Smoking Gun Evidence involving Labor Force 14

Smoking Gun Evidence involving TOT Revenue 18

Univariate Analysis 19

Multivariate Analysis — A DiD approach 22

Conclusion 27

List of Figures

Figure 1: This figure shows the search intensity of different keywords using Google Trends 9
Figure 2: This figure shows the search intensity of different keywords using Google Trends. Note that the search intensity is relative. The Y-axis measuring intensity of "Beach ATV" is different from Y-axis of this figure. 10
Figure 3: This figure shows the time spent at parks relative to January 2020 across three counties: San Luis Obispo, Monterey, and Santa Barbara 11
Figure 4: This plot shows the change in small business revenue relative to January 2020. 13
Figure 5: This figure shows the number of open small businesses relative to January 20202..... 16
Figure 6: This figure shows the number of unemployed in the San Luis Obispo MSA and its neighbors. The monthly data is from the Bureau of Labor Statistics. 16
Figure 7: This figure shows a box plot of the monthly changes in the number of unemployed. The OHV activity was suspended in the State Park from April 2020 to November 2020..... 18
Figure 8: This figure shows the TOT revenue across Avila Beach, Nipomo and Oceano. The data is the publicly available at the tourism website. 20
Figure 9: The blue chart shows Avila Beach's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended. 21
Figure 10: The blue chart shows Nipomo's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended. 21

Figure 11: The blue chart shows Oceano's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended. 22

Executive Summary

Background

Off-highway Vehicle (OHV) recreation is the top attraction in Oceano according to Trip Advisor. [1] But the vehicle use causes environmental loss as it damages sensitive habitat areas and the nesting area of endangered California shorebirds like snowy plovers. [2] Naturally, the vehicle use also causes pollution; it leads to erosion and it leads to lingering trash. Then, there is a tradeoff. On one hand, the vehicle use is positive for the San Luis Obispo County's (referred as the "County") economy as it serves as a tourist magnet. California State Parks hired SMG Consulting (SMG) to study the local economic impact of visitors to the Oceano Dunes State Vehicular Recreation Area (ODSVRA). Their survey-based approach concluded that such activity contributed $243 million to the local economy. [3] On the other hand, the vehicle use is negative because of public safety, health care and environmental costs. Because of the tradeoff, the vehicular access issue remains sensitive. In this report, I analyze the local economic impact from suspending the vehicular use at the ODSVRA between March and October 2020.[4] I do not comment on the environmental, healthcare, and public safety aspects of the suspension. [5]

On July 11, 2019, California Coastal Commission ("Coastal Commission") held a public hearing about the use of vehicles at the ODSVRA. [6] As a rebuttal to the SMG's

---

[1] Top Attractions in Oceano page on TripAdvisor (https://www.tripadvisor.com/Attractions-g32814-Activities-Oceano_San_Luis_Obispo_County_California.html)

[2] https://www.sanluisobispo.com/news/local/environment/article243564792.html

[3] The SMG report can be found here.

[4] Sometimes, I assume that the suspension takes place between April and November 2020. This is because the suspension took place on March 26; vehicular access was open for most of the month of March.

[5] No one compensated me to write this report. All errors are my own.

[6] The report can be found here.

analysis, I argued that SMG overstated the impact. Over the summer after the hearing, State Parks entered into a consent cease-and-desist order with the Coastal Commission after a whistleblowing investigation by the Center for Biological Diversity showed that some State Park's actions had harmed snowy plovers.[7] The vehicular access suspended in March 2020. From a research perspective, the suspension offers another tool to analyze the economic impact. **Unlike previous studies, I can now measure the direct impact on the local economy — I do not have to rely on survey results.**

Note that an economic impact analysis falls in the realm of social science. It is difficult to prove causality; one can only hope for "probable causation". With that caveat in mind, to understand the impact, I analyze:

- Google Trends data to measure the popularity of vehicular use at the SVRA
- Time spent in parks across the County relative to other nearby counties
- Small business revenue decline in the County relative to nearby counties
- Number of open small businesses in the County relative to nearby counties
- Number of unemployed in the County relative to nearby counties
- Transit Oriented Tax / Transient Occupancy Tax (TOT) from Oceano relative to Avila Beach and Nipomo

Data availability constrains me. For example, sales tax is a measurable proxy of the economic impact. Unfortunately, I do not have access to sales tax at a relative high frequency. As a result, I use other proxies of sales tax like time spent at parks and small business revenue. In the same manner, TOT revenue across all areas of the San Luis Obispo (SLO) metropolitan area is an appropriate measure of the impact. For example, if data were available, I would compare Oceano's TOT revenue to Morro bay or

[7] Technically, the Coast Commission consent cease and desist order did not bar vehicle entry. The order suspended vehicle activity in nesting areas which harassed plovers and caused them to move. The order also requested State Parks to limit their own vehicle use. Last, the order suspended any major grading until October 3rd, 2020.

Cambria's TOT revenue. But, due to data availability, I compare Oceano's TOT revenue relative to Avila Beach.

Summary of Research Methods

To understand the economic impact, I break up the analysis in two parts. The first part concerns circumstantial evidence. In this part, I build the case documenting that suspension of vehicular use at ODSVRA had a minimal impact on the County's economy. I build the case by analyzing google trends, time spent at the parks, small business revenue, and number of open small businesses. The second part concerns what is closest to the smoking gun evidence. [8]In this part, I seek to answer two questions:

1. What is the impact on the Oceano Beach's TOT revenue due to the vehicular access suspension?
2. How many jobs were lost due to the vehicular access suspension?

Consider Oceano Inn located on Pier Avenue, which serves as one of the entrances for the vehicular access. The suspension clearly affects the Inn's revenue and in turn, County's TOT. In this sense, the first question directly measures the suspension's impact. The second question concerns jobs, which is arguably the best proxy of an economic impact. Since an Oceano citizen can work in Paso Robles, I measure the job impact by considering San Luis Obispo metropolitan area.

A naïve analysis measures Oceano's TOT revenue in April 2020 and compares the revenue against April 2019. [9] The analysis attributes the yearly change to the suspension. But such an attribution may not be appropriate. For example, suppose that the difference is negative: Oceano's TOT revenue for April 2020 was lower relative to April 2019. Along with the suspension, the decrease may be because of COVID. To make matters worse, the difference, along with COVID, may also be due to the perilous wildfire season. Last, the difference may be seasonal. Perhaps the year 2020 was hotter

[8] As claimed before, economic impact analysis is social science, and I am constrained by data availability. Therefore, I do not have a true measure of a smoking gun.
[9] Naturally, we can measure other months in the same manner.

(or colder) than 2019, which led to a decrease in the number of visitors. To summarize, other factors in 2020 may also cause a dip in the TOT revenue.

To isolate the suspension's impact, I compare Oceano's yearly change with Avila Beach's yearly change. This type of comparison is ubiquitous in public policy and economics — the method is called a "Difference in Difference" (DiD) approach.[10] The idea is simple. COVID, wildfires and overall temperature trends also affect Avila Beach's TOT revenue. The vehicular access suspension at the ODSVRA, on the other hand, does not affect Avila Beach (at least directly). Then, under reasonable assumptions, by comparing Avila Beach to Oceano, I can isolate the suspension's impact.

Said differently, I compare the outcome variable (like time spent in parks) in the County relative to nearby regions. The key assumption in the DiD approach is the so-called "parallel trends" assumption. Implicitly I assume that before the suspension, time spent at parks followed a specific pattern across all the regions. For example, relative to January 2020, if time spent in Monterey in February 2020 increases by 5%, then the time spent in San Luis Obispo will also increase by the same magnitude. Trends are parallel. Then based on the SMG study, since the suspension would disproportionately impact the County relative to neighbors, I would expect a significant decrease in the time spent in parks in the County relative to others. A lack of a significant decrease implies that the suspension did not have a material economic impact.

In contrast, previous studies employed surveys. SMG, for example, asked survey participants of their spending patterns via a survey. To do so, they intercepted visitors at each of the entrances of the Oceano Dunes District parks and asked 16 questions in a post-trip email survey. The survey suffers from measurement error. For example, the

[10] https://en.wikipedia.org/wiki/Difference_in_differences

survey claimed that a visiting party spent approximately $1,300 per visit. However, the survey did not ask where the responders rented their OHVs. It may be that some visitors from Fresno rent from Fresno rather than the County. Incorporating their expenditure in the County's economic impact is misleading. The survey also suffers from selection bias. For example, asking OHV visitors about vehicular access at the ODSVRA selectively focuses on visitors who favor driving on the beach. While the survey included the visitors to the Monarch Grove and campers who did not use ATVs, it did not reach out to pedestrian beach-goers who would otherwise come to the beach for the explicit purpose of swimming, surfing or other non-vehicular activities.

To summarize, since I measure actual outcomes, the DiD approach is direct and does not suffer from the biases plaguing the survey-based approach.

Main Findings

Circumstantial Evidence

1. After analyzing Google Trends data which proxies for search interest, I find that the vehicular access popularity is a small fraction of popularity of Pismo Beach or Avila Beach.
2. After analyzing Google's time use patterns, I find that time spent at County's parks follows a similar pattern as nearby counties during the suspension period
3. After analyzing Womply's small business revenue data, I find that small businesses in the County, actually, fared better than their peers in nearby counties during the suspension period
4. After analyzing Womply's small business openings data, I find that more businesses remained open in the County in April relative to other counties. More businesses remained open in the County relative to Monterey but less than Santa Barbara during the latter half of 2020.

Smoking Gun Evidence

1. After analyzing TOT revenues for Avila Beach, Oceano and Nipomo, using the DiD approach, I do not find any statistical evidence of a negative impact of the suspension.
2. After analyzing the number of unemployed across San Luis Obispo, Salinas, Ventura, and Santa Barbara counties, using the DiD approach, I do not find any statistical evidence of a negative impact of the suspension.

Analysis

Circumstantial Evidence involving Google Trends Data

Modern life revolves around Google. To appreciate the pivotal nature of google, go back to April 2020 when an average person did not understand the COVID symptoms. According to a New York Times article titled "Google Searches Can Help Us Find Emerging COVID-19 Outbreaks", author Seth Stephens-Davidowitz finds that Google searches can find COVID hotspots. For example, searches for "I can't smell" were the highest in New York, New Jersey, Louisiana, and Michigan. Infection rate was also the highest in those four states. [11] Seth's analysis uses Google Trends, which is a public tool that the research community can use to study anonymous and aggregate search data. In the same spirit as the article, I analyze relevant searches to understand the popularity of vehicular use in Oceano.

For any keyword, Google Trends gives a normalized index of the relative use of the word. The trends index has a maximum of 100 where 100 represents the maximum search interest for the keyword. Also, Google Trends can measure search intensity in a

[11] https://www.nytimes.com/2020/04/05/opinion/coronavirus-google-searches.html?auth=login-google

region. In this way, by comparing several keywords germane to the county, one can get a sense of a topic's popularity.

But the use of keywords is more of an art than an exact science. For example, a word like "off-roading" also garners interest in Nevada and Utah. Therefore, adequate analysis has to filter keywords germane to the Central Coast. In that regard, I first compare the keyword "Oceano Dunes SVRA" with "Beach ATV" and "Monarch Butterfly Grove". These three keywords generated major interest in the County and surrounding areas. From a Google search of "Oceano Dunes SVRA", the first item is the link for the State Parks. I used the keyword "Monarch Butterfly Grove" as it is the top attraction in Pismo Beach. I compare those two keywords against the keyword "Beach ATV" which suggests activity. This keyword is more relevant to tourists who may not be familiar with the region.[12]

Figure 1 shows the search intensity of the three keywords since 2003. Two observations are in order. First, the searches follow a seasonal pattern. The search of the keyword "Beach ATV" reaches its peak during summer months, for example. As a result, the economic impact analysis needs to consider the variability across different months. Second, searches for Monarch Butterfly Grove are more popular than searches for Oceano Dunes SVRA (orange line is above the green line most of the time). But search for "Beach ATV" — not Oceano Dunes SVRA — is the most popular (dark blue line is above the other two lines) among the three keywords.

Figure 2 compares the search interest in "Beach ATV" versus keywords "Pismo Beach" and "Avila Beach". The story is different. The search interest in "Beach ATV" is markedly lower than "Pismo Beach" and "Avila Beach". Upon casual inspection, there is no sign that the search interest in either Avila Beach or Pismo Beach decreased in

[12] I also used other keywords; the qualitative results remain identical. Note that the use of search term ATV may have some bias as it is just one type of OHV. Other examples of OHVs are dune buggies and motorcycles.

2020. It is prudent to compare the search interest relative to the one reported in the SMG study. According to Figure 13 in the SMG impact analysis report, 62% of the participants reported ATV riding as an activity. Figure 2 refutes such high participation.

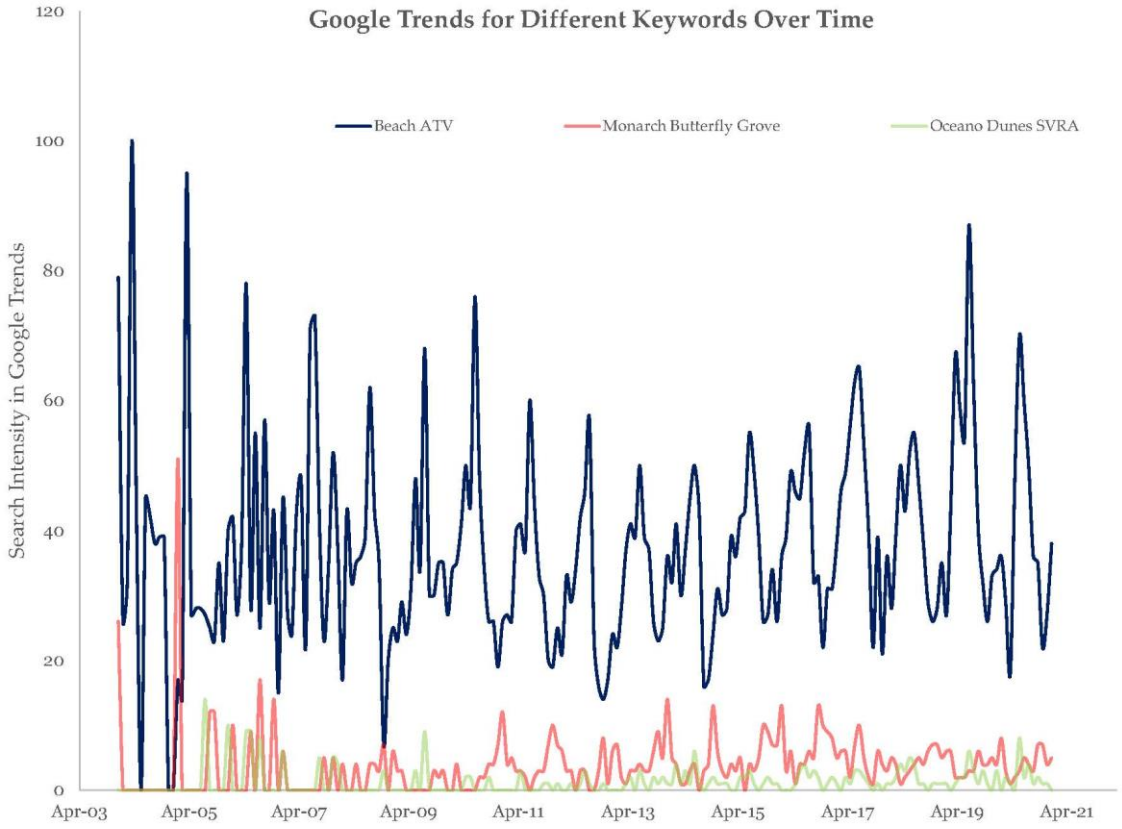


Figure 1: This figure shows the search intensity of different keywords using Google Trends

Note that I cannot claim causality from Figure 2 evidence. Maybe ODSVRA visitors are local or maybe vehicular access attracts repeated visitors who do not use Google. Then, it may be that the Google Trends evidence does not capture the true popularity. In addition, the search intensity is not a proxy of the economic impact. It may be that ODSVRA, even though it is less popular than Avila Beach, has a bigger economic impact relative to Avila Beach. The next two sections address the two issues.

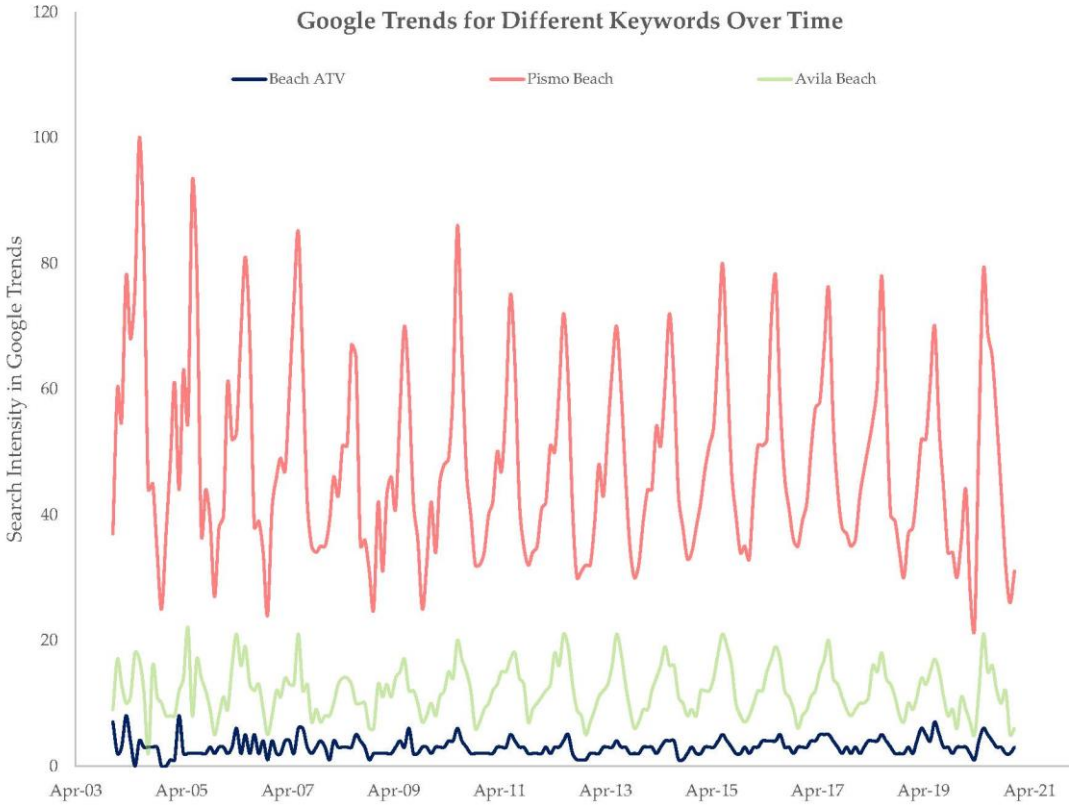


Figure 2: This figure shows the search intensity of different keywords using Google Trends. Note that the search intensity is relative. The Y-axis measuring intensity of "Beach ATV" is different from Y-axis of this figure.

Circumstantial Evidence involving Google's time use data

In response to COVID, Google via Google Mobility Reports constructed measures of daily time spent at parks, retail and recreation, grocery, transit locations, and workplaces. To give a relative sense of the COVID impact, Google normalizes the time relative to January 2020. I use the daily time use data at the GitHub page of Opportunity Insights maintained by professors Raj Chetty and Nathaniel Hendren from Harvard, and Professor John Friedman from Brown (https://github.com/OpportunityInsights/EconomicTracker). [13] Specifically, in Figure 3, I

[13] Simple comparison can also be performed at https://www.tracktherecovery.org/. Note that the data is not available to compare cities like San Luis Obispo versus Pismo Beach.

compare the time spent at parks across three counties: San Luis Obispo, Santa Barbara and Monterey.

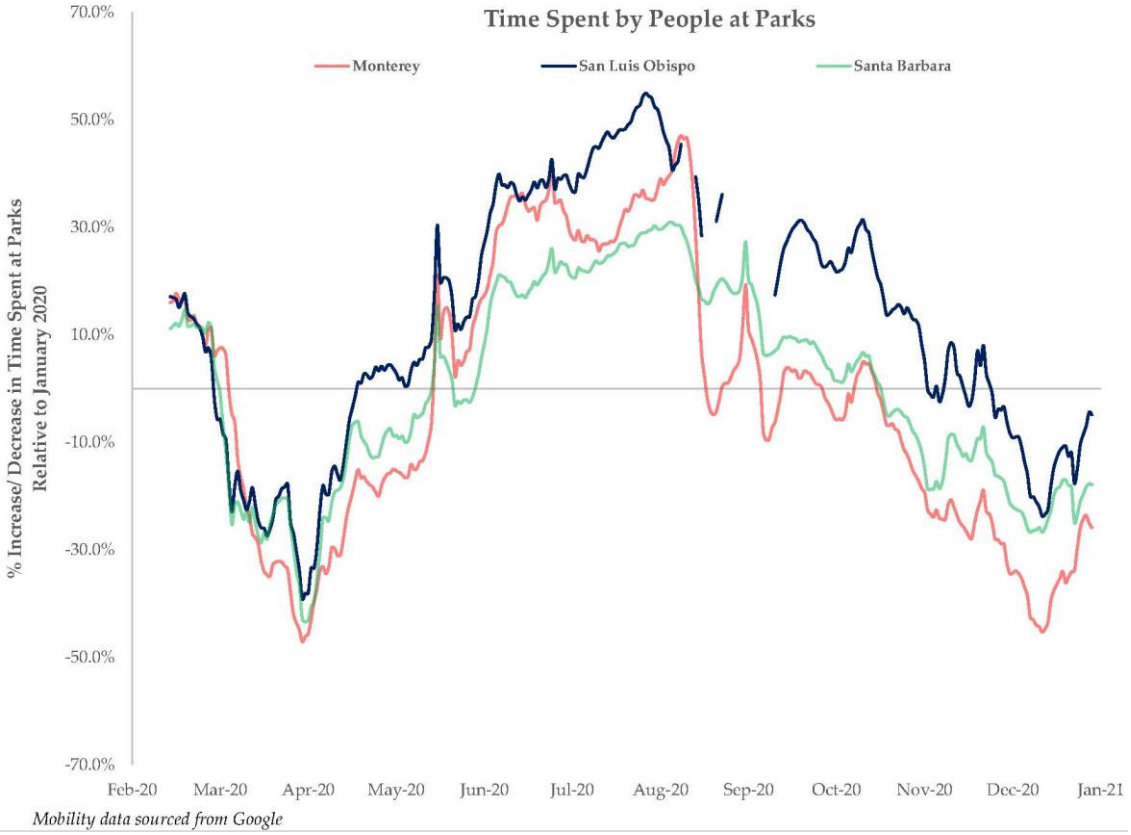


Figure 3: This figure shows the time spent at parks relative to January 2020 across three counties: San Luis Obispo, Monterey, and Santa Barbara

Consider the dark blue line first which highlights San Luis Obispo. Relative to January 2020, the time spent at parks increases in February. But in March as the world comes to gripes with COVID and the resulting nationwide shutdown, time spent at parks experiences a dramatic decline. Relative to January, time spent at parks decreases by over 30%. But, at the beginning of the summer, people venture outside, and the time spent at parks actually increases by over 50% relative to January.

Now compare San Luis Obispo to Monterey in pink and Santa Barbara in green. The overall pattern of a steep decline in March-April and a sharp rise in summer remains for the neighboring counties. In fact, consistently, more time was spent in the

County parks relative to the neighbors — dark blue line is above the other two lines. This suggests that suspension did not affect the time spent at the parks.

Again, Figure 3 evidence is not causal. Since I do not have data on specific location, I cannot, strictly, claim that suspension had a material impact on people trying to spend at parks. But there is overwhelming evidence that even if the suspension had a negative impact on the County's economy, it was not material.

Circumstantial Evidence involving Womply's small business data

Womply is a software company catering to small business needs. For example, with their software, small business managers can solve their accounting, inventory, and banking issues. In response to COVID, it started aggregating data from several credit card processors to provide analytical insights to small businesses and other clients. Similar to GPS tracking by Google, Womply also started providing small business data to the professors mentioned above. I use the same GitHub page[14] to analyze two sets of data: small business revenue and small businesses that remain open. Similar to the mobility data, Womply aggregates the small business data at a county level and the data is relative to January 2020.

In Figure 4, I compare the small business revenue data across three counties: San Luis Obispo, Santa Barbara, and Monterey. Consider the dark blue line representing San Luis Obispo. Due to the COVID shutdown, the revenue decreases by more than 40% between March and April 2020. Such a large drop is unprecedented — it highlights the perilous impact of COVID on the County. Moving forward, the revenue never increases relative to January 2020.

[14] Opportunity Insights GitHub page

Now compare the County to the neighboring Monterey and Santa Barbara counties. All counties experienced a steep decline in the early days of April 2020. It also seems that Monterey county never recovered. San Luis Obispo county fared better relative to the neighbors — dark blue line remains above the green and red lines, mostly. The relative position of the lines implies that San Luis Obispo county was, in fact, least affected.

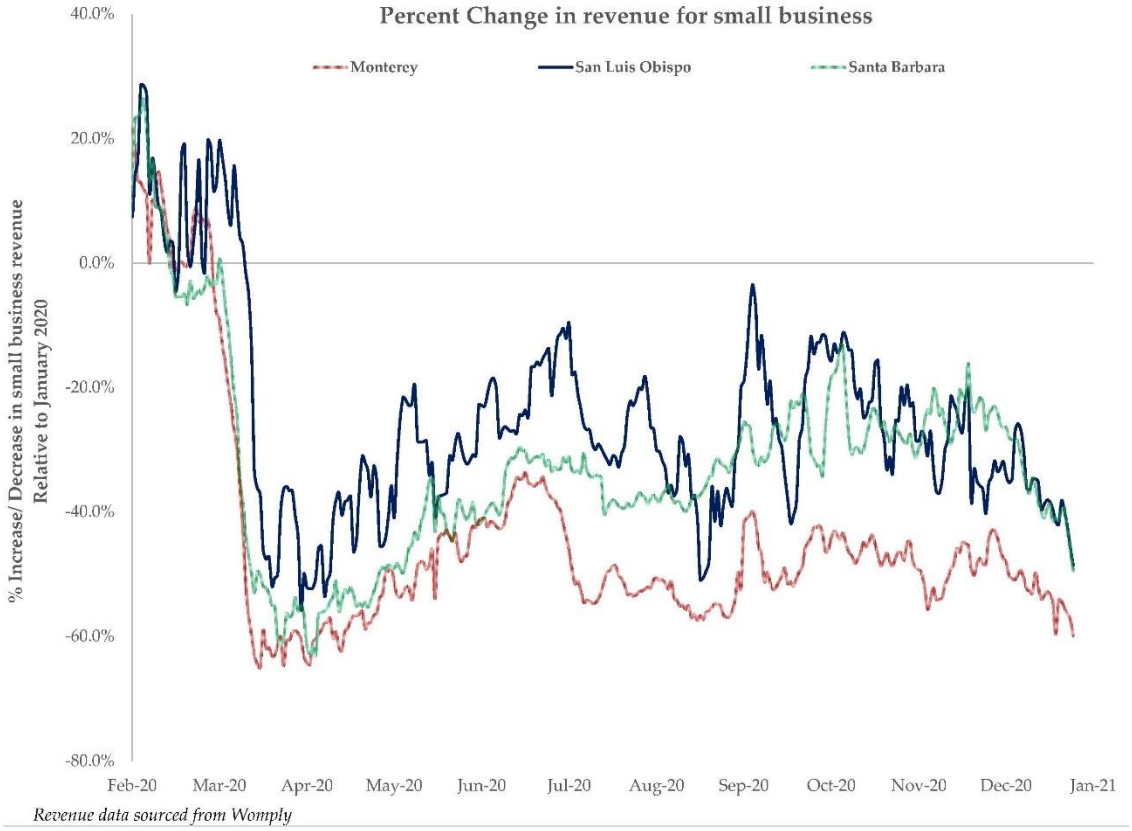


Figure 4: This plot shows the change in small business revenue relative to January 2020.

Figure 5 shows the time series of the number of open small businesses across the three counties. According to this data, more San Luis Obispo County businesses remained open in April 2020 relative to the other counties. But, over time, more businesses closed in the County, but the County still fared better than Monterey.

The relative comparison against neighboring counties is pivotal. The revenue in the County may have declined due to the suspension; the revenue may also have declined because Cal Poly went virtual. Although it went virtual, some students did

stay off-campus. Santa Barbara experienced a similar event. University of Santa Barbara and other community colleges also went virtual and it may be that some students decided to remain off-campus.[15]

To summarize, Google Trends data in Figure 2 suggests that vehicular use is not as popular as other keywords. Figure 3 suggests that there was no marked difference in the time spent at parks across the three counties. Figure 4 suggests that San Luis Obispo small businesses, actually fared better than their peers in neighboring counties. [16] Figure 5 suggests that more businesses remained open in the County during April 2020 relative to the neighbors. Taken together, the circumstantial evidence indicates that even if there was a negative impact from the suspension, the impact was not material. I do not find any evidence of an economic impact on the order of $243 million as claimed by SMG. Next, I analyze the smoking gun evidence: Number of unemployed and TOT revenues.

Smoking Gun Evidence involving Labor Force

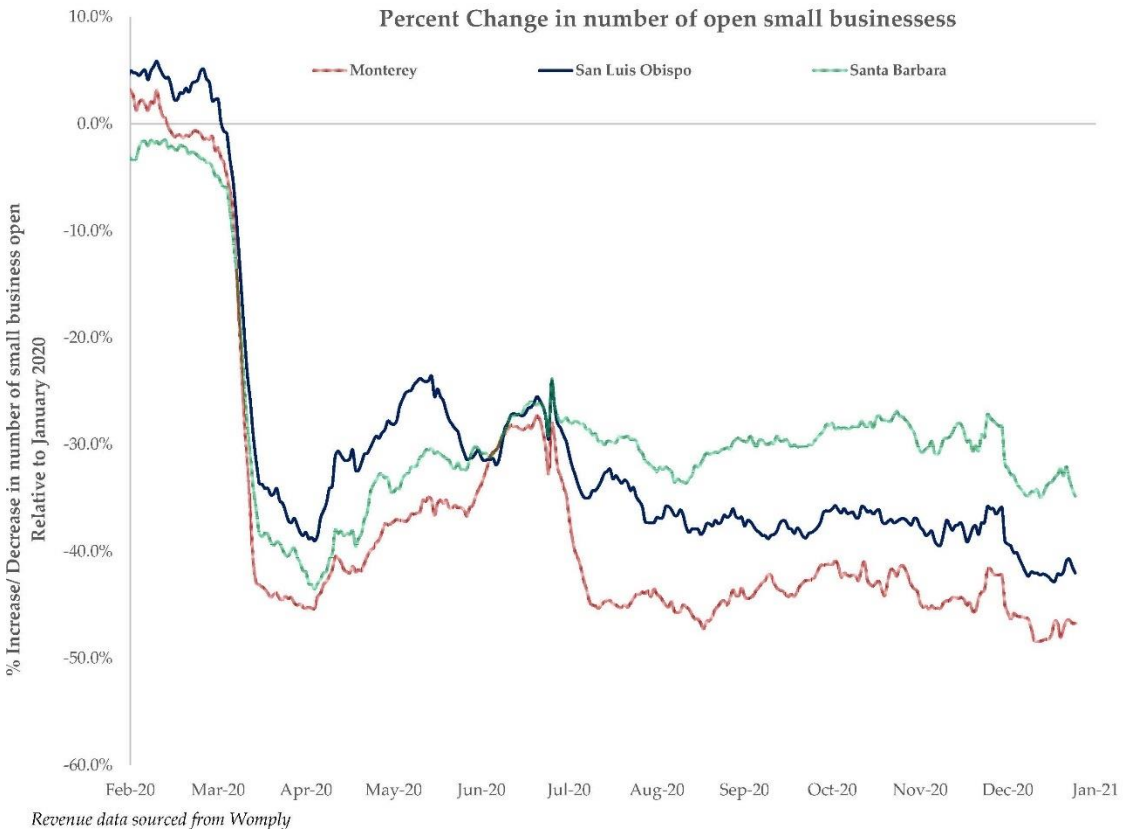
An economic impact analysis is incomplete without a study of jobs. Due to COVID, the US economy lost 22.2 million jobs in March and April 2020 while recovering only 12.4 million jobs. [17] James Carville, who was a strategist for Bill Clinton's successful 1992 presidential bid, once said: "It's the economy, stupid". That statement especially rings true today. In this section, I analyze the time series of the number of unemployed in the County.

[15] It may be that the share of students who remained in off-campus in the County is different than the share of students who remained off-campus in Santa Barbara. The difference in share could result in variable impact. I cannot reject such causation.

[16] The small business revenue is also a proxy of sales tax and I expect that the County sales tax revenues fared better than their neighbors (relative to January 2020).

[17] https://www.reuters.com/article/us-usa-economy/u-s-labor-market-losing-steam-as-covid-19-pandemic-rages-idUSKBN28E0IB

Figure 6 shows the time series of the unemployed in the San Luis Obispo Metropolitan Statistical Area (MSA) and compares it to the neighbors. The data is at a monthly frequency and I get the data from the Bureau of Labor Statistics (BLS). I use the number of unemployed labor force at a MSA level rather than at a county level since it is a better measure of the economic impact. [18] For example, if I was to account only for San Luis Obispo County, then I would miss Paso Robles and in turn I would not account for people who live in the County and commute to Paso Robles.



[18] I have also compared the data at a county level; the results do not change qualitatively.

Figure 5: This figure shows the number of open small businesses relative to January 20202

Two observations are in order. First, the number of unemployed is seasonal. Consider the red line representing the number of unemployed in the Salinas MSA. Clearly, there is a yearly pattern. All other MSAs also have a seasonal pattern albeit the pattern is less pronounced. Second, Ventura MSA lost more jobs than other MSAs. San Luis Obispo MSA lost the least number of jobs. The second observation, however, is more nuanced. Ventura MSA also has the highest labor force; San Luis Obispo MSA has the smallest Labor force. Then, it is not clear if San Luis Obispo lost the least number of jobs relative to the labor force. Therefore, one needs to interpret Figure 6 with copious caution.

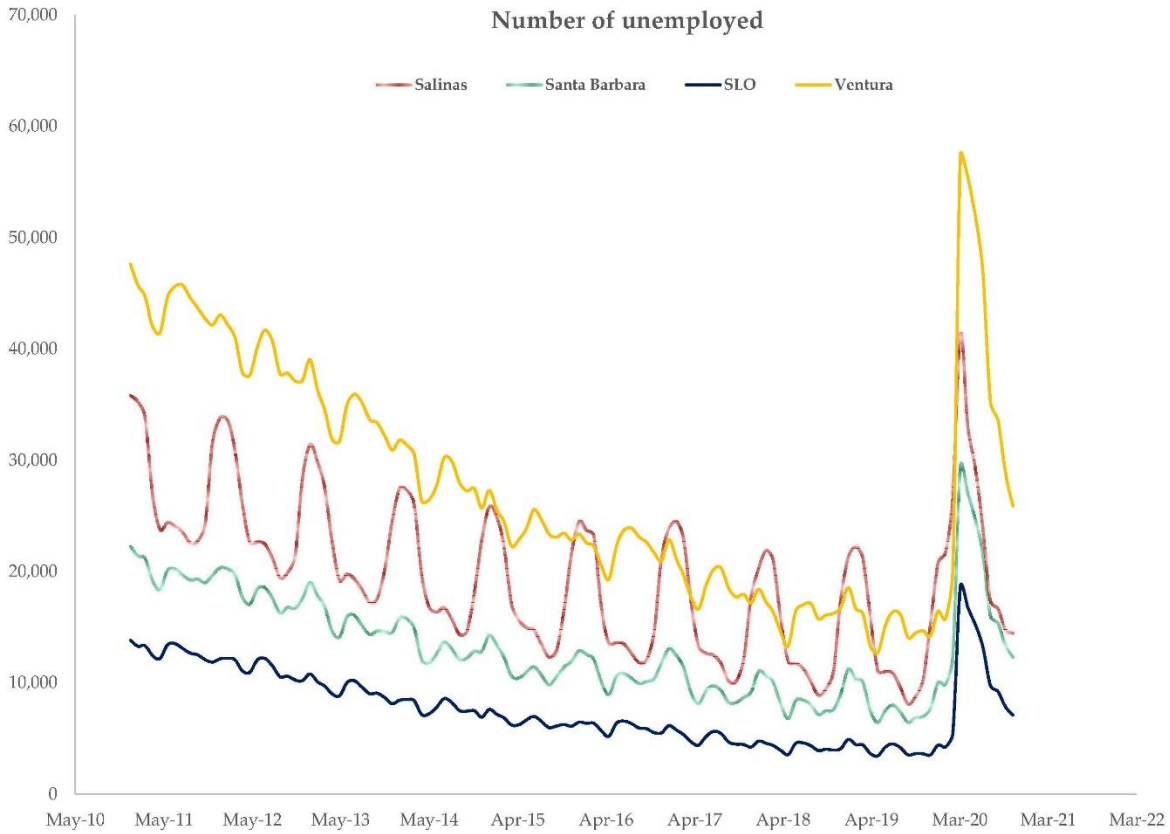


Figure 6: This figure shows the number of unemployed in the San Luis Obispo MSA and its neighbors. The monthly data is from the Bureau of Labor Statistics.

Figure 7 shows the boxplot of the relative monthly changes in the number of unemployed. I analyze relative monthly changes to normalize. To understand the plot, consider SLO (green box). The seven square markers represent the monthly percentage change in the number of unemployed while OHV activity was suspended between March and November 2020. The solid line inside the rectangular box represents the median percentage change: half of the markers are above that line and half are lower. The markers outside the rectangular box are outliers. To the left is the boxplot of the monthly change in the number of unemployed for the past ten years. Note that this period covers the tail end of the past recession. The solid lines in the boxes are different — median monthly change in the number of unemployed is lower when OHV is suspended relative to when it is open. Across all MSAs, the monthly changes are wider when OHV activity is suspended relative to when OHV activity is open. This is consistent with Figure 6. Immediately after March 2020, the number of unemployed experienced a sharp increase. But in summer, it also experiences a sharp decrease. That is, across all MSAs, the changes in monthly unemployed are more variable.

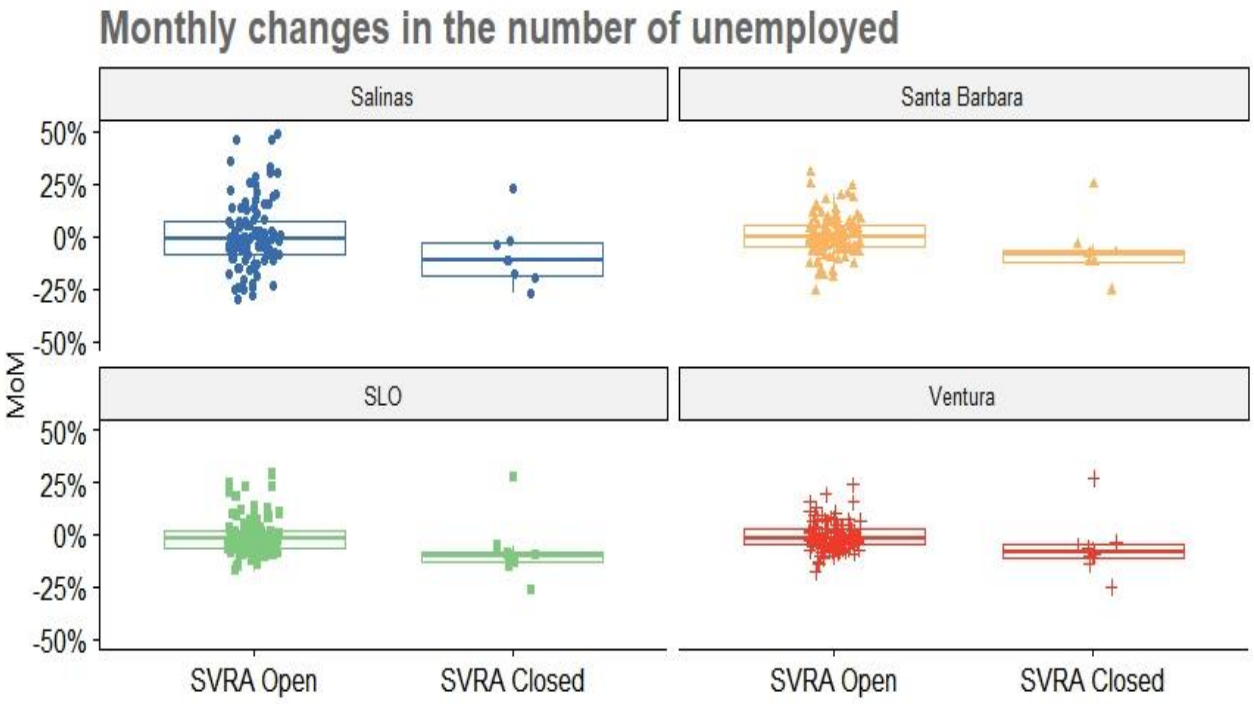


Figure 7: This figure shows a box plot of the monthly changes in the number of unemployed. The OHV activity was suspended in the State Park from April 2020 to November 2020.

As seen from Figure 6, COVID caused a havoc in the US economy; it negatively affected all MSAs. Figure 7 also shows that San Luis Obispo MSA is not adversely affected relative to other counties.

Smoking Gun Evidence involving TOT Revenue

One of the County's revenue drivers is the Transit Occupancy Tax (TOT) program. Another name for the TOT is the "bed tax" or the "hotel tax". Anytime a guest stays at a lodging business, a portion (between 9.50% and 12.5%) of their bill goes toward the TOT program. The portion depends on three components: tax, Tourism Marketing District assessment, and Tourism Business Improvement District assessment. All lodging businesses collect the TOT after registering with the county. The registration requirements are stringent. Regardless of whether an owner rents through a property manager or rents via internet listings, they have to register the business.

Then, by definition, the TOT program is a good proxy of the economic impact created by the Central Coast tourism. In this section, I analyze the impact of the suspension on the TOT revenue.

Univariate Analysis

Figure 8 shows the monthly TOT revenue since 2017. I get the data from the County's tourism website. I only analyze Avila Beach, Nipomo and Oceano due to data availability. The monthly data is available from January 2017 and ends in August 2020. Two observations are in order. First, the TOT revenues follow a seasonal pattern. As expected, the revenues are higher in summer and lower at other times.

Second, the TOT revenue of Avila Beach is approximately 70 times more than Nipomo's TOT Revenue and is approximately eight times more than Oceano's TOT revenue. This nuance is important. Even if the suspension negatively affected the County's economy, it is reasonable to assume that the impact is heterogenous. Due to proximity, Oceano and Nipomo are hurt more than Avila Beach. Then, the overall impact on the County is unclear since Avila Beach brings considerably more revenue to the County relative to Oceano and Nipomo.[19]

The blue column chart in Figure 9 shows Avila Beach's TOT revenue in 2019 for the months from March to August. The seasonal pattern is evident. The TOT revenues are higher in summer relative to spring months. The bottom chart in red shows yearly change in the TOT revenue. In April 2020, Avila Beach's TOT revenue was 70% lower than TOT revenue in 2019.

[19] I use the economic definition of the County rather that the political definition.

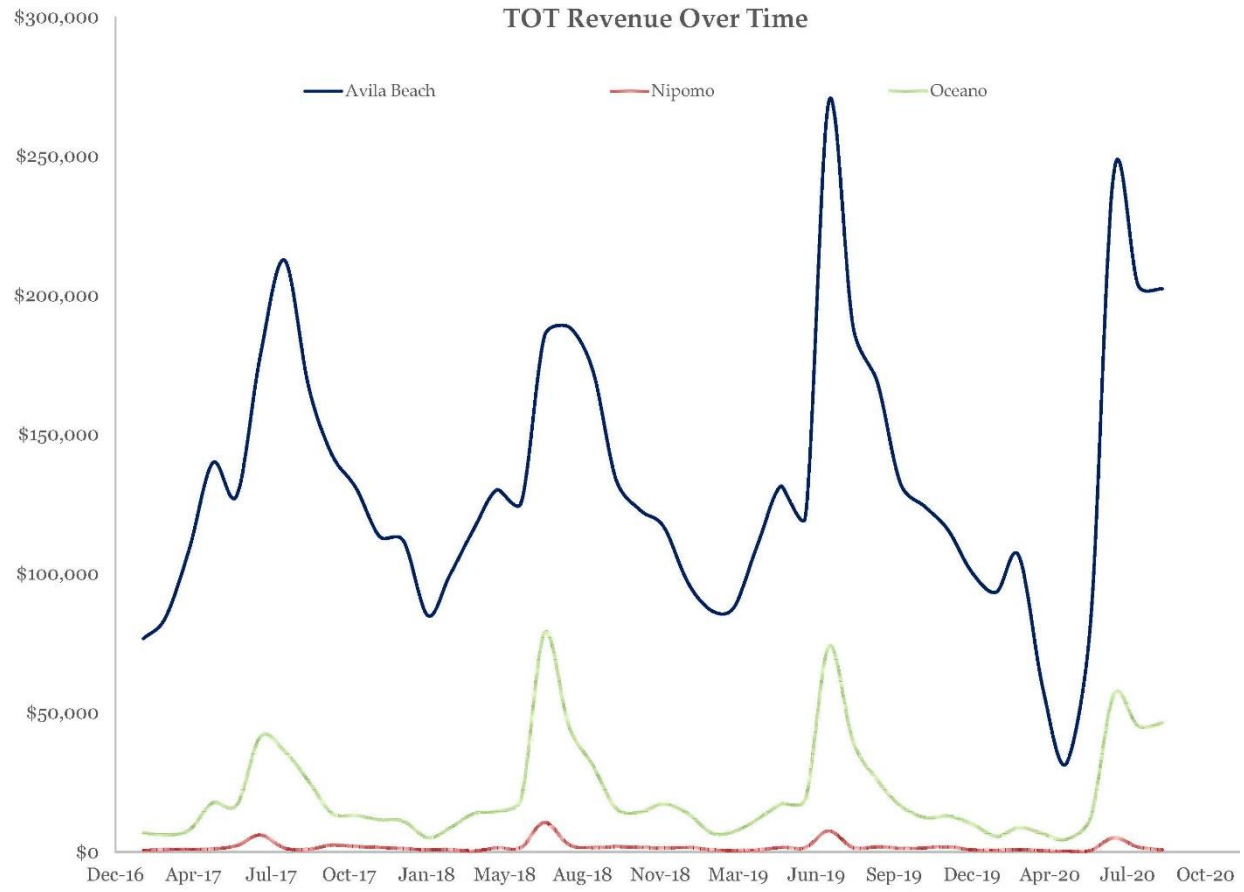


Figure 8: This figure shows the TOT revenue across Avila Beach, Nipomo and Oceano. The data is the publicly available at the tourism website.

But the plot also shows that the TOT revenues, actually, increased in summer 2020. Much to my surprise, in August 2020, Avila Beach's TOT revenue was 19% higher than 2019. Overall, Avila Beach's average revenue was only 6% lower in 2020 relative to 2019.

Figure 10 shows the 2019 TOT revenues for Nipomo and compares them against 2020. Unfortunately, Nipomo is drastically affected as it does not experience the summer rebound. But note the magnitude of the negative impact. At its highest, Nipomo only brought in $8,000 in TOT revenue.

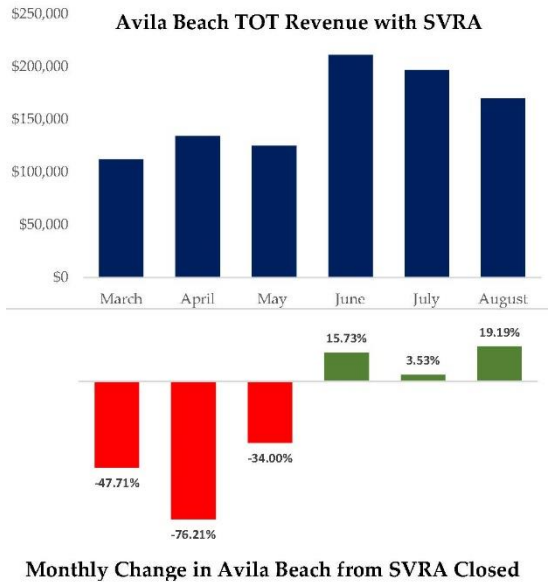


Figure 9: The blue chart shows Avila Beach's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended.

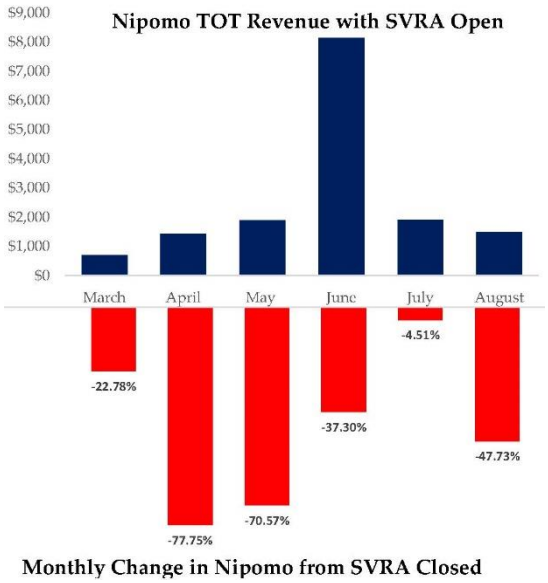


Figure 10: The blue chart shows Nipomo's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended.

Figure 11 shows the TOT revenues for Oceano and compares them against 2020. The story is similar to Avila Beach — not Nipomo. Relative to 2019, Oceano's TOT revenues decrease by more than 70% in April but unexpectedly they rebound by 69% in August. Overall, average monthly TOT revenue in 2020 was $23 K relative to $21 K in 2019 — Oceano's revenue, actually, increased.

It is worthwhile to compare the actual increase in Oceano's TOT revenue against SMG's predictions. According to the SMG study, 62% of the survey participants indicated that they would not visit the County if OHV activity were not allowed. While this may be the case for OHV visitors, it is certainly not the case for the pedestrian and equestrian visitors. Not only are the visitors coming to Oceano but also, they are staying at the Oceano hotels generating more revenue for the County.

Multivariate Analysis — A DiD approach

In this section, I formally apply the DiD approach. As a result, this section is more technical than before.

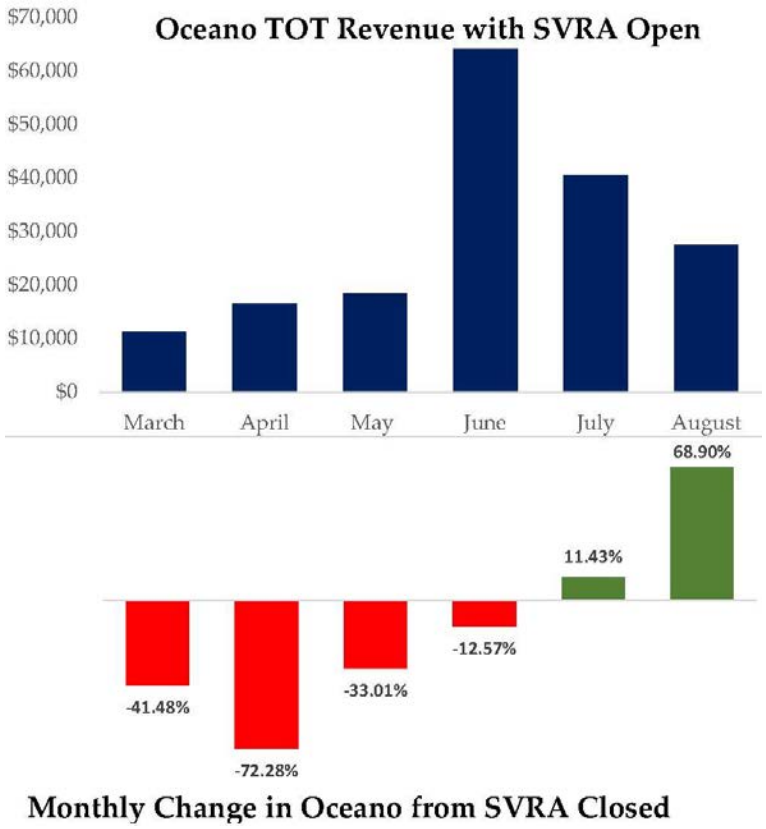


Figure 11: The blue chart shows Oceano's TOT revenue from March to August 2019. The red chart on the bottom shows the relative change in 2020 when vehicle use at the SVRA was suspended.

In the previous subsection, I analyzed the time series. I did so to explore the data through time. But this analysis is incomplete. For example, it could be that tourists changed their behavior: instead of staying in the more expensive Avila Beach, they are staying in Oceano. The univariate analysis in the previous section is incomplete. In this subsection, I use a DiD approach to answer the question: What is the impact on the Oceano Beach's TOT revenue due to suspension of vehicular activity?

With a DiD approach, I distinguish the impact of the suspension on Oceano relative to Avila Beach and Nipomo. Mathematically, I estimate that the TOT revenue for any Area is:

$$TOTRevenue_{im} = \alpha + \beta \times Month_m + \gamma \times Area_i + \theta \times Suspension_{Period} + \delta \times (Oceano \times Suspension_{Period}) + \varepsilon$$

The equation states that the TOT revenue in month *m* at Area *i* depends on

1. Some common level represented by a constant α
2. monthly seasonal variation represented by independent variable $Month_m$
3. Geographic variation represented by independent variable $Area_i$
4. Suspension represented by a dummy variable for the period between April 2020 and November 2020
5. Suspension impact on Oceano represented by the interaction term Oceano × $Suspension_{Period}$. This is the main variable of interest. If the suspension impact on Oceano is statistically significant, then the coefficient δ is statistically different from zero. If the impact is negative, then δ is negative otherwise it is positive. For example, according to the SMG result, δ is negative.

With the equation, I can control for several alternative theories. For example, the monthly fixed effect $Month_m$ controls the monthly variation in the TOT revenues. The Area fixed effect $Area_i$ controls for the geographic variation. $Area_i$ variable implies that Avila Beach is different than Oceano which is different than Nipomo. Since the suspension period coincides with COVID shutdown, the COVID related negative effect is controlled by the Suspension period fixed effect. The interaction term at the end represents the economic impact from the suspension of OHV activity.

Table 1: This table shows the regression determinants of the TOT Revenues of Avila Beach, Oceano and Nipomo. The analysis consists of four models. The first model considers the Area; the second model considers the monthly variation; the third model considers the suspension period, and fourth model considers all of them together.

	Dependent variable:			
	TOT Revenue			
	(Area)	(Month)	(Suspension Period)	(All)
Nipomo	−130,566.500***			−130,566.500***
	(6,381.767)			(4,857.707)
Oceano	−111,371.500***			−112,217.500***
	(6,381.767)			(5,137.289)
February		3,534.472		3,534.472
		(26,313.010)		(9,301.801)
March		5,653.928		7,579.720
		(26,313.010)		(9,430.108)
April		10,249.300		12,175.090
		(26,313.010)		(9,430.108)
May		13,415.390		15,341.190
		(26,313.010)		(9,430.108)
June		65,690.670**		67,616.460***
		(26,313.010)		(9,430.108)
July		49,924.110*		51,849.910***
		(26,313.010)		(9,430.108)

August		39,726.020		41,651.810***
		(26,313.010)		(9,430.108)
September		20,453.360		20,453.360**
		(28,421.300)		(10,047.090)
October		16,206.500		16,206.500
		(28,421.300)		(10,047.090)
November		12,877.140		12,877.140
		(28,421.300)		(10,047.090)
December		7,854.084		7,854.084
		(28,421.300)		(10,047.090)
Suspension Period			4,605.680	−9,771.008
			(16,536.190)	(7,426.467)
Oceano Interaction				6,203.528
				(12,258.780)
Constant	132,421.800***	30,754.270	51,147.790***	111,682.300***
	(4,512.590)	(18,606.110)	(6,106.392)	(7,172.030)
Observations	132	132	132	132
R2	0.791	0.098	0.001	0.891
Adjusted R^2	0.788	0.016	-0.007	0.877

Table 1 shows the results of the regression. Consider the first column labeled Area. This column shows how TOT revenue differs by geography. The results are

relative to Avila Beach. The regression shows that Nipomo's average revenues are $130 K below the revenues of Avila Beach. Similarly, Oceano's revenues are $111 K below Avila Beach. The three stars indicate that the differences are statistically significant.

Now consider the second column labeled month. This column shows how TOT revenues vary by month — the model accounts for seasonal variation. The results are relative to January. Again, the results are as expected. Other than June and July — summer months — average revenue in other months is not significantly different than January. Adding Area to the model in column 4 makes the results even starker — TOT revenue is higher in the summer months (in a statistical sense); TOT revenue in other months is similar to January.

Now consider the third column labeled Suspension period. This column shows the average TOT revenue from April 2020 to November 2020 relative to other time periods. Note that this is also the period of the COVID shutdown. The estimated θ of $4,605 is not statistically significant; the standard error is $16,536. The implication is stark — the suspension period, taken by itself, did not impact the TOT revenue. That said, this third model is inadequate. The R^2 — a measure of the model fit — is below 1%.

Each of the three models by themselves are inadequate. The fourth column incorporates all the models. After adding other factors, revenues for Oceano and Nipomo remain below Avila Beach as expected. The revenues for summer months are also statistically higher than other months. After adding factors, coefficient for the suspension period is negative as expected. Last, to isolate the impact of the suspension, the coefficient for the Oceano interaction term, δ, is of interest. Contrary to the SMG study, δ is actually positive, although it is not statistically different from zero. Taken together, the regression clearly shows that the suspension did not have a material impact on the county's economy.

Conclusion

In this report, I analyze the economic impact from the suspension of the OHV activity at the ODSVRA. Unlike previous studies using surveys, I measure actual outcome variables like time spent at parks, small business revenues, and TOT revenues. Using a well understood and popular DiD approach, I find that vehicle suspension had no material impact on the County's economy.

Economic Impact of Recreational Driving on Oceano's Beachfront

by
Nick Alter
Retired Business CEO

January 29, 2021

Background

For nearly 40 years the California Department of Parks has been operating the Oceano Dunes State Vehicular Recreation Area (the Park), as permitted by the Coastal Commission in 1982. Under the Coastal Development Permit (CDP), street-legal vehicles have been allowed to drive up and down a two-mile stretch of beach extending from Grand Avenue in Grover Beach, across Ocean's beachfront and the Arroyo Grande Creek, to a staging area a mile south of Pier Avenue in Oceano, where ATVs can then be driven in designated areas in the Dunes.

Coastal Commission permitting of this off-highway-vehicle (OHV) activity has been controversial almost from the start, much of it over CDP compliance matters. The controversy has intensified in recent times over a variety of issues, including the questionable legality of this activity under State law and the County's Local Coastal Plan (LCP).

Next in priority to concerns for public health and safety, the chief concern for beach communities like Oceano, Grover Beach and Pismo Beach is the impact OHV activity has on business volume and the local economy. Community beachfronts are their most valuable economic asset for generating revenue growth and creating jobs. This is especially the case for an economically distressed community like Oceano where OHV activity extends across the full length of its beachfront, effectively obstructing pedestrian use, visitor-serving business activity and prospects for economic growth.

Unlike Oceano, Grover Beach's beachfront is mostly vehicle-free, allowing beachgoers to safely stroll and spread blankets on almost all of its spacious beachfront, unimpeded by OHV activity. Its local economy is generally thriving with visitor-serving businesses near and on its beachfront.

Pismo Beach's beachfront is entirely vehicle-free, although it wasn't always this way. Its economy once languished while the City allowed cars on its beach a few decades ago. That changed when the City banned vehicles on the beach in the 1980s, leading to the booming local economy that Pismo has enjoyed ever since.

Avila Beach, Morro Bay and Cayucos add to this picture of beach communities with thriving visitor-serving business activity on and near vehicle-free beachfronts.

These cases show how OHV activity on beachfronts can retard business activity and economic growth. They also suggest how the absence of OHV activity can promote business activity and economic growth.

Exploring What's Possible

As a low-income community with a predominantly Hispanic population and a relatively high jobless rate, Oceano was designated a disadvantaged community and Opportunity Zone by Governor Brown in April 2018. This designation sparked community interest in exploring with graduate students in Cal Poly's City and Regional Planning Department (CRP) what might be possible as an economic growth path.

In two successive "planning studios" in the 2018-19 academic year the Cal Poly students helped residents map out alternative futures for Oceano. Planning studios are academic exercises in which an entire class is assigned a project or series of related projects for an academic term.

In the first of these planning studios, CRP students met with residents in Oceano for a series of four workshops during the fall and winter terms, leading them progressively through a process that culminated in the preparation of a community plan update in March 2019. Slide presentations of the four workshops, including resultant plan, are available to view as PDFs for anyone interested, at https://planforoceano.wixsite.com/oceano/8th-project or email: OEDC@earthlink.net.

The second planning studio picked up where the first one left off, with a new class of CRP graduate students assigned to work on a series of projects. Chief among the projects were two specific plans that laid out conceptual models for redeveloping Pier Avenue as a visitor-serving business district, and for creating a town center in an adjoining area with a mix of commercial, residential, educational, and cultural/historical land uses.

Banning Recreational Driving on Oceano's Beachfront

Both specific plans depend on Oceano having a vehicle-free beachfront. The Coastal Commission could fix this by discontinuing vehicular activity altogether on the beach and dunes or by closing the vehicular entrances at Pier and Grand Avenues and opening a vehicular entrance south of Oceano closer to the Dunes.

Picking a suitable site for a southern entrance presents its own set if issues, with the matter boiling down to choosing a site that does the least harm environmentally and economically.

In a just-released statement, Coastal Commission staff has indicated it intends to recommend "nonvehicular public recreational access south of Pier Avenue" along with the closure of the Pier Avenue entrance, presumably leaving the Grand Avenue vehicular entrance open.

This would transfer the full brunt of vehicular access to Grand Avenue. Vehicles heading to the dunes would then be required to travel more than an extra mile to get to the dunes, turning the stretch between Grand and Pier into a beach superhighway. Oceano's beachfront would also be overrun with traffic across the extent of its beachfront, not just from Pier Avenue south in many cases. This idea would fail to ameliorate the beachfront situation for Oceano and would seem to make matters worse in some ways for all concerned.

Even if the idea behind this recommendation is to facilitate a transition to a vehicle-free beach in five years, which is what the Commission has said it has in mind, there is little community trust in this happening in the face of the Commission's admitted history of "kicking the can down the road."

Deepening the issue of trust is a history of the Coastal Commission's and Natural Resource Agency's failure to seriously address the "elephant in the room" issue of operating the Park in violation of the State's Coastal Act; failure to enforce CDP compliances with State Parks over the years; and failure to apply their own environmental justice policy to an EJ poster child like Oceano by preempting Oceano's use of a beachfront that is the community's only spacious outside recreation area and also its bedrock economic asset for promoting economic growth and creating jobs. Hardly what Governor Brown is likely to have had in mind when he designated Oceano a disadvantaged community and an Opportunity Zone.

The bottom line is, Oceano has an uphill struggle to clear the way for economic growth. And the only feasible opportunity it has for economic growth is with a vehicle-free beachfront.

The Choice

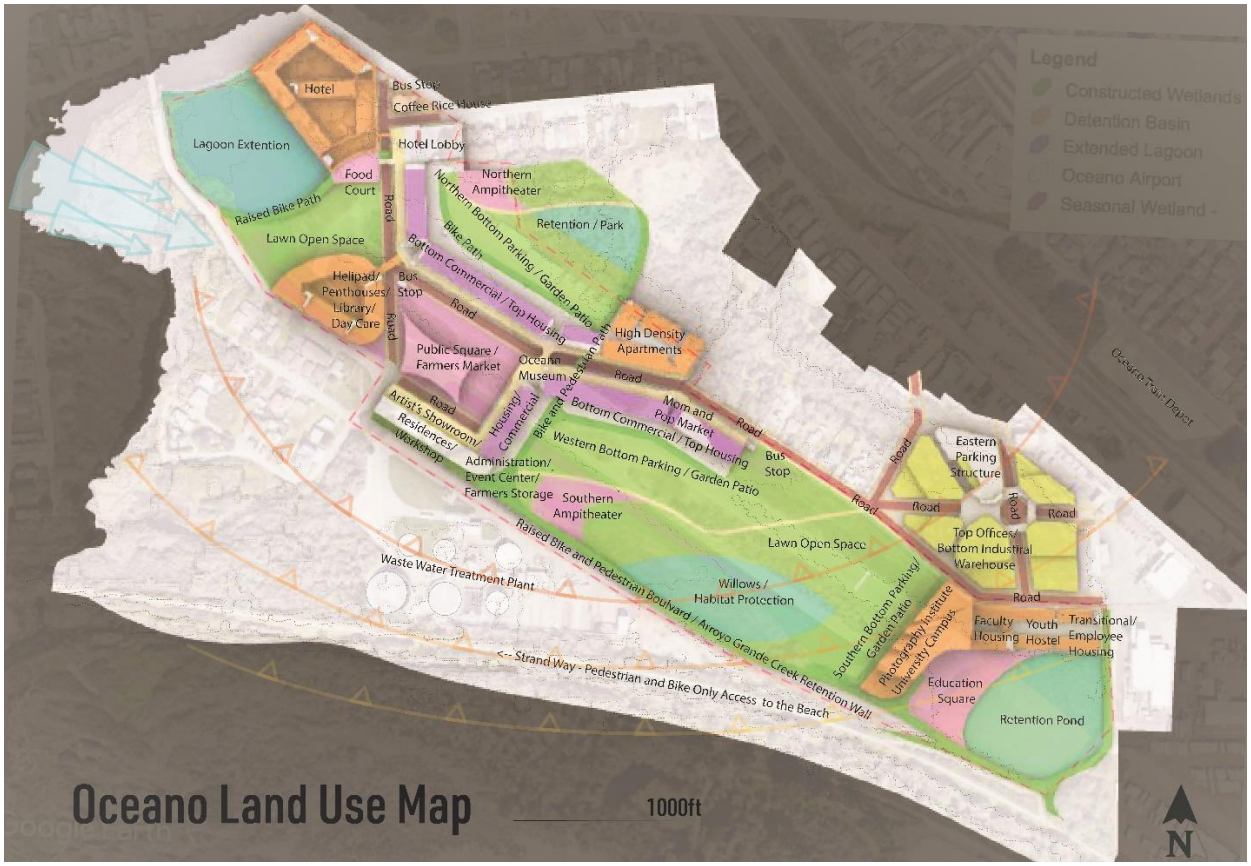
Ultimately, Oceano's future comes down to what people in Oceano and the County want and are willing to pursue, based on an informed choice that puts aside predispositions and vested interests to explore what's best for Oceano and the County. An Oceano Economic Development Council (OEDC) is in the process of being formed with this in mind, as an outgrowth of work done over the past two-and-a-half years with Cal Poly's City and Regional Planning Department and Business School.

The Oceano residents who participated in the four community workshops led by Cal Poly CRP students in 2018-19 said they wanted "maximum growth." Whether or not others in the community want this too is yet to be determined.

The value of the CRP workshops was chiefly in what participants said they wanted and didn't want in their visions for a future Oceano. This, then, shaped the conceptual modeling for the specific plan for a town center near the beach, for the express purpose of (a) analyzing the potential impact such a development could have on the local economy, housing and job creation, and (b) informing a community-wide land-use preference study.

The Town Center specific plan was recently refined for the preparation of a 65-acre land-use map with 30 acres of open space and trails, 12 types of residential housing, more than 350,000 square feet of commercial space, 200,000 square feet of hospitality and community facilities, 350,000 square feet of education and historic facilities, and 150,000 square feet of parking space.

This conceptualization of the Oceano Town Center is now being analyzed by Cal Poly Professor Pratish Patel and finance students of his to prepare a pro forma financial analysis that estimates projected business revenue, sales tax revenue, TOT revenue, property tax revenue, County leasing revenue, costs and capital requirements, operating expenses, asset valuation, financial returns where applicable, and jobs.



Oceano Town Center Concept

When this is done, it will then be possible to design and implement a community-wide land-use preference study with Oceano residents, basically asking them about the kind and mix of redevelopment they'd like to see in Oceano, showing them what might be possible in terms of job creation, housing and improved living conditions.

The sole purpose of the Town Center design modeling and economic modeling being done is to show possibilities for redevelopment, not to promote any particular model or even the idea for this kind of redevelopment.

The basic question being addressed is whether and to what extent the asset value of Oceano's beachfront and the resultant socioeconomic returns on this asset (to Oceano residents, businesses, and the County) are greater with or without recreational vehicle activity on Oceano's beachfront.

We already know that communities with vehicle-free beachfronts in the County are thriving, while Oceano is not and will not if cars and trucks continue to drive on its beachfront, as was once the case in Pismo Beach.

We also now know that the State Parks' claim of a $243 million impact, as reported in its issuance of a 2016/17 survey-based SMG economic impact analysis, is bogus, as reported initially in Pratish Patel's 2018 critique of the analysis, and then in his just-published report, *Economic Impact from Suspension of the Vehicular Use at the Oceano Dunes SVRA*.

So, what we now have is three evidentiary sources that tell us that, not only does driving on a beach community's beachfront have no significant economic value, it can also obstruct or inhibit economic growth.

What remains to find out, at this juncture, is (a) how much of an economic opportunity there might be for Oceano and the County by redeveloping Oceano as a beach community versus the non-beach-community it has become since 1982 when its beachfront was repurposed for recreational driving and (b) what area-residents prefer versus what governing authorities, special interests and outsiders prefer.

The economic choice seems clear enough to warrant serious consideration for further investigation by and for the County.

# # #

Consider the plover

Amber Clark <alclark81@gmail.com>

Mon 2/1/2021 4:16 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Hello,

I am a local scientist working with the western snowy plover and wanted to make a comment about considering protections of the western snowy plover when deciding the direction of the park. Please take into consideration plover nesting when making recommendations to the park. During the nesting season portions of the park would need to be closed for plover nest and chick protection, most likely limiting all hike in camping mentioned and pedestrian access to large portions of the shore. Pedestrians walking or on horseback can be a big disturbance to nesting plovers, unlike people in vehicles. Pedestrians are perceived as a predator while vehicles are not, so pedestrians can keep a bird off a nest or away from chicks and in windy or extreme weather this can cause abandonment of nests and death of chicks. Sometimes the management of this species isn't super intuitive, I just hope you reach out to plover and tern experts (not general ornithologists) when making your plan.

Thanks for listening

Amber Clark

Staff Recommendations - Oceano Dunes

jack@jmoyer.net <jack@jmoyer.net>

Mon 2/1/2021 2:01 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I wholehearted support the staff recommendations regarding the transformation of the Oceano Dunes State Park to a non-ORV use, emphasizing camping, closeness to Pismo Beach and accessibility of local businesses. There will be a transitional period where businesses oriented exclusively to the ORV community will be impacted; they will need to evolve to another model or be replaced by more camping and day use concerns. Many beach communities on the Central Coast thrive with non-ORV enterprises. The chance for Oceano to develop and its citizens become able to use the natural wonder that they live by but can't use.

Thank you for the thoughtful, well presented recommendation by your staff.

Regards,

Jack Moyer
Nipomo, CA 93444

TO: California State Parks

RE: Pismo State Beach and Oceano Dunes SVRA Public Work Plan and Draft EIR

DATE: February 1, 2021

A stated guiding principles of the Public Works Plan is

- ***Sustainability****. Adaptively manage lands, resources, and recreational opportunities so they may be enjoyed by many generations of Californians to come.*
  - ***Protect the Natural Environment****. Preserve and restore natural habitats, maintain healthy ecosystem processes, and assist the recovery of degraded ecosystems in line with state and federal regulations. Reduce any social and environmental impacts on the natural environment and prevent future impacts through site sensitive planning.*

The proposed "improvements" for the Oso Flaco Lake area and the Phillips 66 property are in complete disregard of these guiding principles. In addition, State Parks has ignored hundreds of comments, many from qualified experts, on the draft PWP regarding the irreparable environmental damage that will be caused by "improving" the Oso Flaco Lake area.

The Guadalupe-Nipomo Dunes are an ecological treasure that provides important habitats for hundreds of coastal species. In 1974, the U.S. Secretary of the Interior designated the Guadalupe-Nipomo Dunes Complex (GNDC) as a National Natural Landmark for containing the largest, relatively undisturbed coastal dune tract in California and exhibiting one of the highest rates of endemism of any dune system in North America. A 1980s inventory of sensitive resources within California produced by the U.S. Fish and Wildlife Service described the GNDC as "the most unique and fragile ecosystem in the state" and ranked it 1st on a list of 49 habitat areas in need of protection statewide.

The coastal foredune habitat in this area is important nesting habitat for the federally threatened Western snowy plover and California least tern. Healthy riparian habitat surrounds Oso Flaco Lake and Little Oso Flaco Lake, where a variety of bird species flourish. It is a birding hotspot, with many wintering.

This area is also home to a rich diversity of other faunal species. The California red-legged frog Little Oso Flaco Lake for breeding, and the tidewater goby has been found where Oso Flaco Creek empties into the ocean. Three rare invertebrates are found here, all of which were named after their findings at Oso Flaco Lake: Oso Flaco robber, Oso Flaco flightless moth, and Oso Flaco patch butterfly. The marshes surrounding Oso Flaco Lake are home to federally endangered Gambel's watercress and marsh sandwort.

The plan's proposed development and enhanced public use would create significant impacts to the natural and biological resources of this area.

- Campgrounds are notorious introduction sites for invasive species. Campgrounds also attract increased numbers of native predators, including raccoons and crows, that increase mortality of endangered species such as the ground nesting western snowy plover and the California least tern.
- Vehicles and animals will also bring seeds of invasive plants into an area where restoration work has largely restored the native flora.
- Increased activity from campgrounds and traffic from new off-road riding entrance points may affect the ability of species to migrate through the GNDC. Oso Flaco Lake acts as a pinch point in the GNDC, funneling species into a narrow migration corridor. If this migration corridor is disrupted it could have disastrous consequences for species ability to move and adapt to a changing climate.

- Development would bring many hundreds of people and their pets into this area. It's inevitable that people and off-leash dogs will roam throughout the nearby dunes and wetland areas, fencing and "keep out" signs notwithstanding. It's important to recognize that the proposal's environmental impact would extend far beyond the boundaries of the campground and the access trails.
- Campgrounds and OHV staging areas are noisy environments. The campground and car headlights would introduce significant light into what is presently a very dark nocturnal environment. Noise and light are not compatible with many species.
- The proposal is not compatible with traditional users of Osos Flaco Lake and the surrounding dunes: people who come to fish, bird, observe wildflowers and native plants, or simply enjoy the solitude of the dunes.

The Draft EIR is significantly deficient in not addressing many of these issues, especially cumulative impacts. Identified environmental impacts such as 7-1 (Direct and Indirect Impacts on SNPL and CLTE Primary and Secondary Habitat), 7-5 (Direct and Indirect Impacts on Nesting and Wintering/Migrating Birds, 7-7 (Direct and Indirect Impacts on Special-Status Plants), and 7-10 (Impacts on Wildlife Movement) are narrowly focused on construction activities, maintenance, and the footprint of built amenities such as boardwalks. The analysis largely ignores the environmental impact of hundreds of people and pets wandering over the dunes around the lake, which is a significant deficiency, or assumes with no evidence that a few "keep out" signs will provide adequate mitigation.

Impact 7-10 on wildlife movement considers only the construction of a boardwalk at Oso Flaco Lake and completely ignores the impact on wildlife movement of a large campground at the edge of the lake. This is a serious deficiency.

The impact on wildlife of lights and noise from the campground are not considered, even those these are known to be severe. This is a serious deficiency.

Impacts from the introduction of invasive plant and animal species are not analyzed. This is a serious deficiency.

Section 7.4 on Cumulative Effects dismisses cumulative effects in a mere one paragraph, calling them "less than significant" and even suggesting that the PWP will have beneficial impact. This would laughable if the consequences weren't so dire. Failure to provide a meaningful analysis of cumulative effects is an extremely serious deficiency of the Draft EIR.

The Draft EIR contains many deficiencies in the Biological Resources section and should not be approved. The PWP would place the fragile dune ecosystems and many years of restoration efforts at serious risk. This project at and near Oso Flaco Lake would constitute a breach of the plan's guiding principles and does not protect the public-trust resources that the State of California is obligated to protect. All of the proposed development at and near Oso Flaco Lake should be removed from this plan.

Sincerely,

Randall D. Knight, Ph.D.
10050 Corona Road
Atascadero CA 93422

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Sun 1/31/2021 9:30 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Jennifer Johnson (jennydawn1@hotmail.com) Sent You a Personal Message
<automail@knowwho.com>
Sent: Saturday, January 30, 2021 8:32 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Jennifer Johnson
202 Camino DR
Novato, CA 94949
jennydawn1@hotmail.com
(206) 701-4249

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Drive on the beach, not the dunes

John Anderson <truegrit44@gmail.com>

Sun 1/31/2021 4:23 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

When you visit an area of the dunes where vehicles are not allowed you discover a remarkably majestic place; quiet with delicate plant and animal life. These areas to not contribute significantly to the particulate air and noise pollution experienced on the Nipomo mesa.

In Texas, a state where “anything goes” (ie open carry of firearms, drive through liquor stores) you are allowed to drive on almost any beach in the state. BUT it is illegal to drive on a sand dune. Texas recognizes the fragile nature and importance of coastal sand dunes. It is incomprehensible that California allows OHVs to violate its dunes.

I think a compromise might be made that allows vehicles to drive below the high tide line or within a reasonable distance of the high tide line to reach campgrounds or access picnic areas. But I propose that no vehicles be allowed to disturb the delicate crust and ecosystem of the dunes.

If the current OHVR park were proposed today, I don’t believe there is even a slight chance it would be approved. Its time has passed.

John Anderson
Nipomo, CA

Oceano Dunes

William Brown <williamlbrown@charter.net>

Sun 1/31/2021 7:09 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I agree with the staff recommendations as they will remove the dune buggy riders from the dunes
William L Brown

Sent from my iPhone

My opinion

Toni <toni.morris50@charter.net>

Sun 1/31/2021 1:48 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I would like to support the Coastal Commission in its vision of offering more on beach camping and other activities that do not disrupt the flora and fauna of the dunes. I enjoy bird watching and walking and feel the continued use of the area by OHV disrupts the natural, environmentally friendly habitat. As a nurse who has worked with severe respiratory illness in intensive care units, and whose father had COPD, I feel confined degradation of the dunes, causing aerosolizing micro particles in the air, is unacceptable for the health of the local communities.

Thank you,

Toni
toni.morris50@charter.net

Toni Morris, RN, BSN, MA

Fees

Laurance Shinderman <lshinderman@sbcglobal.net>

Sat 1/30/2021 5:45 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I think the $10.00 fee is quite the bargain…in fact too much of a bargain.

These rigs are often hundreds of thousands of dollars; so I don't think raising the fees is a hardship. Also are the fees per/day or for the duration of their stay. I think there should also be an assessment for clean-up as the site often looks like a garbage dump alone the fence line.

Coastal Commission Meeting March 18

Irwin Joseph <irwinjoseph.mediator@gmail.com>

Sat 1/30/2021 5:24 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Good morning:
I read that the Coastal Commission is considering widely divergent views of the future of Oceano Dunes. This email is in favor of the Staff recommendations and particularly opposed to State Parks' position.

At the last meeting in SLO (which I attended until the room got too rowdy with all the editorializing by the black-shirted OHVrs), staff presented seven different reasons for reducing the off-road uses of the dunes. I am guessing the overwhelming presence of the OHV crowd caused the commission to think there was some compromise possible.

From the expansion plans and proposals of State Parks, we all know that compromise is not in their DNA at this point. If given their rein, the dunes from Phillips plant all the way to the (almost sacred) Oso Flaco reserve will be filled with extremely dangerous and environmentally damaging activities. New entrances will be carved in the dunes. Traffic will increase as capacity is increased. The air quality will return at least its worst prior levels. All in the name of "my family has been doing this for years."

So, I"m going to make a few suggestions:
First, before their families were doing this, the dunes were quiet, relatively pristine and beautiful. I remember driving on the wet sand in SLO County in my car in the 1970's and just watching the surf for what was a soothing, peaceful respite from my temporary work in the area. Since off-roading began, all that has been decimated.

Second, there are plenty of other places to off-road, without causing an environmental disaster. State Parks has nine SVRAs.

Third, videos you have seen show that self-policing of policies and regulations is inadequate, at best. Riders exceed speed limits, drive over protected areas, kill and maim wildlife, and destroy the natural habitat. People are hurt and killed on the dunes, something Parks never mentions.

Fourth, the financial impact of riders on the dunes is overstated. Dunes riders set up miniature cities, roping off areas for their families and cohorts. These are not the people driving into Pismo Beach, Arroyo Grande or Grover Beach for all their meals. These are largely campers on the beach who bring with them a majority of the food and drink they intend to consume while here.

Last, this is an opportunity for the commission to respond to its staff report instead of ignoring it or postponing consideration.

A few years ago, I had the privilege of addressing you directly. The meeting was very small, held in SLO County building. It was orderly. People were respectful.

My three minutes had three themes:
1. You have the power to deal with this issue. Historically, other agencies recognized the danger of cigarette smoking. Rules were imposed which, ultimately, led to vast areas and entire cities now

banning smoking. For a time, there was loud objection, fueled by tobacco industry money. And now, lung cancer is significantly less a lethal disease than it was.

Here, Staff has its recommendations for a new vision of Oceano Dunes. State Parks is using its funding to make a case for expansion of current uses. I believe the Coastal Commission believes elimination of the current (absent Covid restrictions) use of the dunes is in the best interest of all, and has the power to so decide.
I am hopeful it will do so.

2.To those who say, "you are infringing on my freedom" and "why are you taking this away from me?" there is a response: The Coastal Commission has an obligation to keep people and the environment safe, just as other agencies do. For example, traffic signals keep traffic orderly. Waste disposal laws and regulations keep drinking water safe. Non-flammable kids pajama requirements keep children safe.
It is the responsibility of the Coastal Commission to keep the environment safe for those birds and other animals on the dunes and those living downwind. As a 73-year-old resident of the Trilogy development, our windows and doors are always closed. We restrict our outdoor time when the 2.5 meter on my back porch climbs above 50, a common event during 3/4 of the year when the dunes are open. We are severely restricted in enjoying the outdoors and the weather conditions we moved here for.
So, some would question why the "rights" of the OHVrs are superior to my rights to enjoy my portion of the environment by being outdoors without harming my health.

3. Now is the time to act. The last meeting at the Embassy Suites was a disaster. OHVrs took over the property with trucks, American flags, black t-shirts and crowded listening rooms (to say nothing of disrespectful responses to opinions with which they disagreed). It was madness.

The Commission needs to move forward this time. There are eight other SVRAs in California. No one is taking away the right to off-road by redesigning the uses of Oceano Dunes; instead, the Coastal Commission is deciding the most inappropriate place to ride is due for protection and expansion of uses for more wide swath of the population. Riders have plenty of other places to relive their memories of family on the dunes.

Please consider this communication as support of the Staff recommendations to the Coastal Commission and the new vision for Oceano Dunes.

Thank you.

Irwin Joseph
irwinjoseph.mediator@gmail.com

Visit my website:
www.MediateYourDispute.com
www.MediateYourDisputeOnline.com

Staff Recommendations for Oceano Dunes

Anita and Tom Giangreco <gngreco@sbcglobal.net>

Sat 1/30/2021 5:19 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I have lived in Nipomo for 8 years and hope the staff's recommendations are put in place soon. The changes would be beneficial to local towns, residents and visitors. The riders would have other areas in the state to ride, and more people would take advantage of an area that many have never been to.

Thanks,

Tom Giangreco

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Fri 1/29/2021 9:37 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Ryan Brown (ryan.ebrown12@gmail.com) Sent You a Personal Message
<automail@knowwho.com>
Sent: Friday, January 29, 2021 1:27 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Ryan Brown
2319 CREST DR UPPR, upper unit
Manhattan Beach, CA 90266
ryan.ebrown12@gmail.com
(949) 606-2272

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Public comment on upcoming Oceano Dunes CCC meeting

Ethan S. <ets81519@gmail.com>

Fri 1/29/2021 9:14 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Commissioners,

I am writing to you to express my ***support*** for the California Coastal Commission's view that, given the myriad of environmental and legal issues at play, **OHV use at the Oceano Dunes should be phased out over the next 5 years.**

I am a resident of the City of San Luis Obispo, and my wife is a native to Arroyo Grande. We often visit the Five Cities and are always looking for opportunities to enjoy all that they have to offer with our family and friends. Unfortunately, the Oceano Dunes are *not* currently on our list.

To be clear: I've never visited the Dunes. I'm just another SLO County resident who enjoys the outdoors, but despite my environmentalist leanings still find myself outside far less than I should be. But if I am going to go out and enjoy what the region has to offer, **a destination with a reputation for environmentally-destructive uses, widespread littering, and aggressive visitors** is *not* where I will choose to spend my time.

Perhaps I am wrong about the Dunes and how things feel on the ground. But if even I am hesitant to visit - and I have ridden ATVs, participated in plenty of "risky" outdoor activities, and just generally enjoy a rowdy time - I cannot imagine how many other SLO County residents and tourists are avoiding the Dunes.

I am *sure* that riding an off-road vehicle on the Dunes is thrilling and I would enjoy it. It does not mean that it should continue as an allowed use. Please hold the line against State Park's staff and protect this exceptional ecosystem. I'm certain that I will drive down the highway to enjoy the proposed expanded camping and recreational opportunities once the sound of ATVs tearing across the sand has ended.

Regards,
Ethan Stan
San Luis Obispo, CA

Fw: California Coastal Commission

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Fri 1/29/2021 4:19 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: bill house <pirate805@gmail.com>
Sent: Friday, January 29, 2021 8:19 AM
To: Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; CNRA COPC Public <COPCPublic@resources.ca.gov>; info@lairdforcasenate.com <info@lairdforcasenate.com>
Cc: Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Directorreplogle@oceanocsd.org <Directorreplogle@oceanocsd.org>; Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; oceanobeachca@gmail.com <oceanobeachca@gmail.com>; dunesalliance@gmail.com <dunesalliance@gmail.com>; sierraclub8@gmail.com <sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: California Coastal Commission

http://www.coastal.ca.gov/oceano-dunes/

"A Time for Unity and Peace at the Oceano Dunes"

I hope the Natural Resources Agency and State Parks will publicly support these recommendations for the Oceano Dunes. It is time to put the mistakes of the past behind us and move forward.

As a resident of Oceano, I do not want to see this this area torn apart during the next 60 days !

With the Coastal Commission, State Parks and Environmental groups working together we can build a new model for success in Oceano and California. Using stimulus and infrastructure funding, cap and trade funds, OHV and Coastal Commission grants we can not only develop a new conditional use permit but have the prescriptive funding to restore, rebuild, redevelop and mitigate many of these problems in our communities and at the Oceano Dunes State Park. It is a time for positive leadership and action.

Environmental Justice and Equality for Oceano

bill house <pirate805@gmail.com>

Thu 1/28/2021 9:18 PM

To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; info@lairdforcasenate.com <info@lairdforcasenate.com>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; Kchristensen22@comcast.net <Kchristensen22@comcast.net>; CCCA3858@gmail.com <CCCA3858@gmail.com>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Abeals@co.slo.ca.us <Abeals@co.slo.ca.us>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>; Tkeith@co.slo.ca.us <Tkeith@co.slo.ca.us>; Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Maricela@causenow.org <Maricela@causenow.org>; Glimon@caleja.org <Glimon@caleja.org>; Tiffany@caleja.org <Tiffany@caleja.org>; Hharmon@slocity.org <Hharmon@slocity.org>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>

With the unhealthy dust plume that hangs over the Oceano Dunes we have come to realize that we can still see clearly when we look at the science, facts, law and the truth . The compromise Coastal Commission plan is outstanding and gives me hope for the future. My only concern is that the five year transition must be front loaded to include verifiable progress benchmarks. If not, it only becomes something that is used to delay and we find ourselves back in the same place in 2026. We all know that is the truth based on history and we will have then accomplished nothing.

I believe we need to immediately close Pier Avenue, create a safe beach access zone in Oceano, implement the designated safe vehicle driving zone. Just identifying the numerous well documented problems is not enough. With new State and Federal funding we can rebuild and bring more equality to Oceano and local communities. If we wait five years these funds will not be available. Strategic urgency must become part of the plan if we want successful outcomes.

In March, working together we can approve a new conditional use permit that helps solve the problems at the Oceano Dunes. New funding makes mitigation, restoration, rebuilding, redevolpment, infrastructure improvements and equality possible. A lot has changed in the last 12 months. With that change brings the need for adjustments, reevaluation and updating the transition timeline.

We can make environmental justice history and build more healthy communities with this new conditional use permit for the Oceano Dunes. This is one of those rare opportunities in our lifetime when we can really make a difference not only in Oceano, but in our surrounding communities, the State and our Country.

#10.30.2020

FW: Biden to place environmental justice at center of sweeping climate plan

Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>

Fri 1/29/2021 12:20 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Oceano Beach Community Association <oceanobeachca@gmail.com>
Date: Wednesday, January 27, 2021 at 4:08 PM
To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>, Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Subject: Biden to place environmental justice at center of sweeping climate plan

Dear Kevin and Dan,
President Biden will make the needs of low-income Americans and communities of color the focus of his plan Wednesday making environmental justice a top priority for the first time in a generation.
https://www.washingtonpost.com/climate-environment/2021/01/26/biden-environmental-justice-climate/

The president plans far-reaching actions to cut carbon emissions, aid polluted communities and shift the nation away from fossil fuels.

Oceano is a poor community oppressed by the illegal, obnoxious presence of beach and dunes vehicular traffic. We are at risk of inundation because of the grading to accommodate beach traffic.
Dear Dan and Kevin,
This is the right time for you and the CCC to push for the total banishment of vehicular traffic on Oceano beach and dunes. This is the term to do it. Please do not lose this chance.

Best,
Lucia Casalinuovo
Oceano Beach Community Association
oceanobeach.org

FW: Environmental Justice and Equality for Oceano

Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Thu 1/28/2021 10:57 PM
To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: bill house <pirate805@gmail.com>
Date: Thursday, January 28, 2021 at 1:18 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>, Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>, Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>, Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>, info@lairdforcasenate.com <info@lairdforcasenate.com>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>, Lreynolds151@gmail.com <Lreynolds151@gmail.com>, Kchristensen22@comcast.net <Kchristensen22@comcast.net>, CCCA3858@gmail.com <CCCA3858@gmail.com>, Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>, Dawn@dawnaddis.org <Dawn@dawnaddis.org>, Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>, Abeals@co.slo.ca.us <Abeals@co.slo.ca.us>, Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>, Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>, Tkeith@co.slo.ca.us <Tkeith@co.slo.ca.us>, Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>, Dunesalliance@gmail.com <Dunesalliance@gmail.com>, Sierraclub8@gmail.com <Sierraclub8@gmail.com>, Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>, Maricela@causenow.org <Maricela@causenow.org>, Glimon@caleja.org <Glimon@caleja.org>, Tiffany@caleja.org <Tiffany@caleja.org>, Hharmon@slocity.org <Hharmon@slocity.org>, Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>
Subject: Environmental Justice and Equality for Oceano

With the unhealthy dust plume that hangs over the Oceano Dunes we have come to realize that we can still see clearly when we look at the science, facts, law and the truth . The compromise Coastal Commission plan is outstanding and gives me hope for the future. My only concern is that the five year transition must be front loaded to include verifiable progress benchmarks. If not, it only becomes something that is used to delay and we find ourselves back in the same place in 2026. We all know that is the truth based on history and we will have then accomplished nothing.

I believe we need to immediately close Pier Avenue, create a safe beach access zone in Oceano, implement the designated safe vehicle driving zone. Just identifying the numerous well documented problems is not enough. With new State and Federal funding we can rebuild and bring more equality to Oceano and local communities. If we wait five years these funds will not be available. Strategic urgency must become part of the plan if we want successful outcomes.

In March, working together we can approve a new conditional use permit that helps solve the problems at the Oceano Dunes. New funding makes mitigation, restoration, rebuilding, redevolpment, infrastructure improvements and equality possible. A lot has changed in the last 12 months. With that change brings the need for adjustments, reevaluation and updating the transition timeline.

We can make environmental justice history and build more healthy communities with this new conditional use permit for the Oceano Dunes. This is one of those rare opportunities in our lifetime when we can really make a difference not only in Oceano, but in our surrounding communities, the State and our Country.

#10.30.2020

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Thu 1/28/2021 3:35 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Izayah Mora (moraizayah@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Wednesday, January 27, 2021 8:07 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Izayah Mora
60 W Olsen Rd
Thousand Oaks, CA 91362
moraizayah@gmail.com
(714) 905-6529

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Fw: Environmental Justice and Equality for Oceano

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Wed 1/27/2021 4:50 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: bill house <pirate805@gmail.com>
Sent: Monday, January 25, 2021 4:21 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Cc: Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Glimon@caleja.org <Glimon@caleja.org>; Maricela@causenow.org <Maricela@causenow.org>; Lucas@causenow.org <Lucas@causenow.org>; Tiffany@caleja.org <Tiffany@caleja.org>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>; Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; CNRA COPC Public <COPCPublic@resources.ca.gov>; info@lairdforcasenate.com <info@lairdforcasenate.com>; Kchristensen22@comcast.net <Kchristensen22@comcast.net>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; Hharmon@slocity.org <Hharmon@slocity.org>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>
Subject: Environmental Justice and Equality for Oceano

From March to October the Oceano Dunes was closed to vehicles. I believe now we can easily implement a new conditional use permit that immediately restricts vehicles, closes Pier Avenue and creates a vehicle free beach access zone in Oceano.

Pier Avenue in Oceano is the place where pollution, poverty, degradation, symbols of hate and racism meet. It is the tip of the spear for systemic racism in Oceano.

We can longer give permission to the OHV Division to harm the environment, people and low income-communities of color. They have had 40 years to solve the problems, work collaboratively with local agencies and at risk communities. They have failed, and if we are all honest we realize that If we give them 5 more years they will do nothing, violate the agreement and create more harm. It will be seen as a sign of weakness to be exploited, it is how these groups think and work.

The OHV Division should not be rewarded with a golden parachute benefit when we have better options and transition timelines that can provide immediate social, economic, environmental and public health relief.

The healing and rebuilding can only begin after the new compromise conditional use permit is fully implemented. To put this in perspective what would you want to happen if it was about you, your family, your health and life ? When you answer that question you will know exactly what needs to be done at the Oceano Dunes .

#10.30.2020

Fw: Oceano Dunes

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Wed 1/27/2021 4:49 PM
To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Matthew O'Donnell <modonnel2@hotmail.com>
Sent: Sunday, January 24, 2021 6:15 AM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: Oceano Dunes

Dear Coastal Commission,

I am a local resident of the Oceano Dunes preserve. While I am extremely pleased that OHV traffic has been largely prohibited this past year, I would like to bring to your attention another matter for consideration. Having recently walked the beach stretches permitted to vehicles, the beaches are completely saturated with charcoal from open fire pits dug into the beach sand. The tide then washes and distributes the charcoal on all of our local beaches. The charcoal is so prevalent that it is impossible to step without hearing the crunch of charcoal.

Further, it is extremely distressing to see ocean birds (including the Snowy Plover) struggling to find food amongst the vast amount of charcoal and ash. This is a man-made problem that is not natural to these birds.

My suggestion to the Commission is that fires be permitted only in concrete fire pits set back far from the water line. Beach fires should only be permitted in designated burn pits. People using those fire pits should pay a fee and deposit for their use. If the pits are left uncleaned after use, their deposit is forfeited. This action could prove to be an additional source of revenue to the state park system and would largely eliminate the vast amounts of charcoal on the beaches.

Thank you for your consideration.

Matthew O'Donnell
Nipomo, CA

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Wed 1/27/2021 3:53 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Alyssa Kane (alyssamkane@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Tuesday, January 26, 2021 6:47 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Alyssa Kane
1749 Reed Ave Apt E
San Diego, CA 92109
alyssamkane@gmail.com
(612) 210-4507

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Wed 1/27/2021 3:52 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Adrianna Freeman (freemanadrianna@yahoo.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Tuesday, January 26, 2021 10:42 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Adrianna Freeman
1065 Westridge Avenue
Danville, CA 94526
freemanadrianna@yahoo.com
(415) 852-1459

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Fwd: Finacial Impact Myths and the Oceano Dunes State Park

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Wed 1/27/2021 7:01 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: bill house <pirate805@gmail.com>
Sent: Thursday, January 21, 2021 11:51:05 AM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; CCCA3858@gmail.com <CCCA3858@gmail.com>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>; Glimon@caleja.org <Glimon@caleja.org>; Tiffany@caleja.org <Tiffany@caleja.org>; Maricela@causenow.org <Maricela@causenow.org>; info@lairdforcasenate.com <info@lairdforcasenate.com>; Hharmon@slocity.org <Hharmon@slocity.org>; Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Nnix@co.slo.ca.us <Nnix@co.slo.ca.us>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>
Subject: Finacial Impact Myths and the Oceano Dunes State Park

Recently Pismo Beach City Manager reported, " sales tax and transient occupancy tax receipts show that businesses actually saw Increased Revenues from June to October 2020, as compared to 2019 !

Even with the Oceano Dunes State Park closed to vehicles, Pismo Beach broke records.

Clearly, we can adopt the Coastal Commission compromise recommendations for the Oceano Dunes State Park , close Pier Avenue, create a vehicle free beach zone in Oceano and build our economy, creating more jobs.

The first 100 days are critical so that we can take advatage of the funds coming from the State and Federal government to support communities, businesses, infrastructure, public health, environment and promote social and economic equity in our low income-environmental justice community.

Let us be bold in our plans.

#10.30.2020

FW: Environmental Justice and Equality for Oceano

Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Fri 1/22/2021 6:53 PM
To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: bill house <pirate805@gmail.com>
Date: Friday, January 22, 2021 at 9:03 AM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>, Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>, Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>, Office of the Secretary CNRA <secretary@resources.ca.gov>, CNRA COPC Public <COPCPublic@resources.ca.gov>, info@lairdforcasenate.com <info@lairdforcasenate.com>, Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>, Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>, Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>, Padilla, Stephen@Coastal <Stephen.Padilla@coastal.ca.gov>
Cc: Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>, Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>, Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>, Lreynolds151@gmail.com <Lreynolds151@gmail.com>, Kchristensen22@comcast.net <Kchristensen22@comcast.net>, CCCA3858@gmail.com <CCCA3858@gmail.com>, Sierraclub8@gmail.com <Sierraclub8@gmail.com>, Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>, Dunesalliance@gmail.com <Dunesalliance@gmail.com>, Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>, Maricela@causenow.org <Maricela@causenow.org>, Glimon@caleja.org <Glimon@caleja.org>, Tiffany@caleja.org <Tiffany@caleja.org>, Assemblymember.garcia@assembly.ca.gov <Assemblymember.garcia@assembly.ca.gov>, Info@connieleyva.com <Info@connieleyva.com>, Chinook.shin@sen.ca.gov <Chinook.shin@sen.ca.gov>, Hharmon@slocity.org <Hharmon@slocity.org>, Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>, Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>, Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>
Subject: Environmental Justice and Equality for Oceano

As the anger, confrontation, intimidation, flags and symbols of hate continue to increase at the Oceano Dunes State Park, it gives us time to pause and recalculate the impact of a five year transition at this time at the Oceano Dunes. Please do not underestimate the facts on the ground. Things have changed in the last year !

Community members are increasingly placed at risk by individuals who want to silence the voice of opposition at the Oceano Dunes. I have asked numerous times for the OHV Division to condemn these flags and symbols of hate and place signs at the entrance.State Parks and the OHV Division have remained silent, and in that silence they have made a statement. We have all read the statement from Secretary Crowfoot about "Moving Forward with Justice and Equity."

As community members and others who support improvements and environmental justice at the Oceano Dunes come under direct attack we must all take a breathe, stand back and realize the extreme forces at work here. Clearly senior leaders at State Parks and Natural Resources do not want to make the hard decisions or use their own political capital so early in their careers to solve the problems at the Oceano Dunes. They have made the calculated political decision to let the Coastal Commission do the dirty work for them !

In closing, we all know what needs to be done. The facts and rule of law are clear and convincing. Normally a five year plan is in order. The Oceano Dunes is different for so many reasons that we now need to recalculate the transition timeline to incorporate a safer and more orderly transition. We need a plan that will "Cause No Harm" and bring peace and safety to the Oceano Dunes State Park.

#10.30.2020

OCEANO
Advisory Council

TO: State Parks
With cc: CCC, Crowfoot Dept of Resources, Quiintero State Parks, SLO BOS, Grover Beach CC, Arroyo grande CC, Pismo Beach CC
FROM: Oceano Advisory Council

Dear State Parks,

Thank you for the opportunity to comment on the Pismo/Oceano Public Works Plan. Our Oceano Advisory Council reports to the San Luis Obispo County Board of Supervisors. Our Council wishes to express our unanimous opposition to the continued use of Pier Ave as an access point for the SVRA. The PWP is proposing that Pier and Grand Ave be permanently designated as primary entry points to the beach and the SVRA.
This PWP includes the following recommendations to address issues identified during the planning effort: • Permanently designate Grand and Pier avenues as primary access points to Oceano Dunes SVRA. The Plan 3-5

In the early 1980's this entrance was defined as temporary and, more than 40 years later, it is still in use with massive increases in traffic volume which impact our community in many negative ways. In addition, major and costly upgrades to the entrance points are also proposed.
3.3.10 A4. Pier and Grand Avenue Entrances and Lifeguard Towers Project This project will replace the entrance kiosks at Pier and Grand avenues that are outdated, in poor condition, and not ADA compliant. A new design will improve operational efficiencies and allow staff to assist park visitors better.
Our primary concerns revolve around the CEQA and CCC requirements in relation to environmental justice in the economically disadvantaged community of Oceano with approximately 50%+ of its residents defined was Latino. It is our position that State Parks is in violation of the spirit and letter of this regulation and it needs to be corrected now, not made permanent.

As quoted in the PWP Planning Process 2.0, the purpose of the Environmental

Justice component of CEQA is the following (2.2 Environmental Justice):
The purpose of the policy is described as a way: "…to empower these communities [as defined in the Policy] that have been historically excluded from accessing the benefits of coastal development and resources due to discriminatory implementation of local, state, and federal policies and lack of access to the process and decision-makers." (California Coastal Commission, 2019, p. 4).

The clear facts are that Oceano has been "…historically excluded from accessing the benefits of coastal development and resources due to discriminatory implementation of local, state, and federal policies and lack of access to the process and decision-makers." This exclusion from benefits is all because of the fact that our beaches are filled with all forms of automobiles and trucks which means all forms of animals (including homo sapiens) are at physical and emotional risk when seeking to recreate on the beach.

For decades the temporary use of our main access route to our community's beach has been dominated by motor vehicles which is an inappropriate use of a public beach. And this temporary use has resulted in economic and recreational losses to our community.
Unlike other California beach communities, Oceano has never been able to achieve any significant benefits from coastal development because the great majority of Californians (and locals) do not want to recreate on a beach made dangerous and uninviting by thousands of motor vehicles. Pier Avenue is a shabby, rundown hodgepodge of ATV rentals and off-roader accessories and supplies stores with tracked out beach sand blowing in the street and air.
Pismo Beach only became a desired tourist destination after it banned vehicles from its beaches. We want the same opportunity to develop our local economy, create hundreds of new jobs, and have a beach where our families, children, grandparents and visitors can RELAX, rather that dodge vehicles and stress about their kids playing in the sand.
Section 2.2.2 Meaningful Engagement purports to enumerate all the ways State Parks has engaged our community over the years. We are not experiencing this. Only recently did communications or outreach be presented in Spanish and English. Surveys done by State Parks are notoriously biased with unrepresentative samples, leading questions, and unsubstantiated data on mythical revenues from the SVRA. New comparative econometric research from

Cal Poly (unpublished) comparing Oceano to other coastal non-SVRA communities (e.g. Avila Beach) show there are no significant positive economic impacts from the SVRA. In fact, during the SVRA Covid-19 closure, County Transient Occupancy Taxes in Oceano were the highest in five years.
In conclusion, our community is tired of decades of being the "doormat of the dunes." We are long overdue for our chance to enjoy and prosper from a beach

without vehicles. We have suffered from State Park's policies, procedures, and operations that continue to use our beach as the access to the SVRA—and continue to keep us off of the beach.

Sincerely,



Allene Villa/Chair
Oceano Advisory Council
(805)904-8269

Oso Flaco Proposal

Sarah Fuller <sarahfullerup@hotmail.com>

Sun 1/24/2021 1:56 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>; OceanoDunes.PWP.EIR@parks.ca.gov <OceanoDunes.PWP.EIR@parks.ca.gov>

Hi,

I recently read the proposal for the future of Oso Flaco Lake.

I just want to say that I think it would be short-sighted and very tragic to build in this area. I have been going to Oso Flaco regularly for years. It is a very special and beautiful place, it brings a lot of joy to people and it is also a really special habitat.

We have the ability to build on it and change it, but we don't have the ability to change it back. I think we should leave it how it is for fifty more years, and reconsider then. I believe that in those years it will become more and more apparent that we need natural areas like Oso Flaco Lake for our continuing physical and spiritual health and the health of our community, as well as the health of the plant and animal communities that call that place home. I think in the long term that place is of more value to us in its natural state.

Please reconsider destroying this very special place that means so much to people.

Sincerely,

Sarah Fuller
323 770 4168

Oceano Dunes

Thomas Weinschenk <thomasweinschenk@sbcglobal.net>

Sat 1/23/2021 2:47 AM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

The Oceano Dunes and beaches from Grover Beach down to Guadalupe are a precious national resource. I've walked, jogged, and fished on these beaches over the past 30 years, and I have never seen beaches in California teeming with so much life. The Pismo clam, many varieties of fish, dolphins, whales, native plants, and a wonderful abundance of seabirds make this a special habitat that must be respected and preserved. Please do your part to keep vehicles, trash, and other disturbances to animals and vegetation from this precious natural resource.

Sincerely,

Thomas Weinschenk,
San Luis Obispo

Concerned Citizens for Clean Air

Jan. 22, 2021

Dear APCO Willey and APCD Board members,

Is it possible to bring the air pollution emissions from the Oceano Dunes SVRA even closer to the homes and sensitive receptors living on the Nipomo Mesa??

Yes, it is, and in fact State Parks does just that in its recently released draft Public Works Plan. See this link, https://www.oceanodunespwp.com/en/documents/draft-eir

The development of the Phillips 66 property is proposed as a future project in the plan. Acres and acres of OHV riding area, a motocross track, an obstacle course, a kids riding area, and a staging area are included. Since this area is basically vegetation-covered sand dune that will be destroyed, just what would you expect the end result to be?? Dust clouds? Bad air quality for neighbors?

The draft EIR actually states on page S-53 " Ongoing OHV riding at the Oceano Dunes SVRA does not destroy or substantially modify the dunes." Really? No mitigation is required. Haven't the APCD and State Parks previously determined that riding areas are 5 to 8 times more emissive than non-riding area? Phillips 66 is presently a non-riding area. When it becomes riding area, it follows that it will become more emissive.

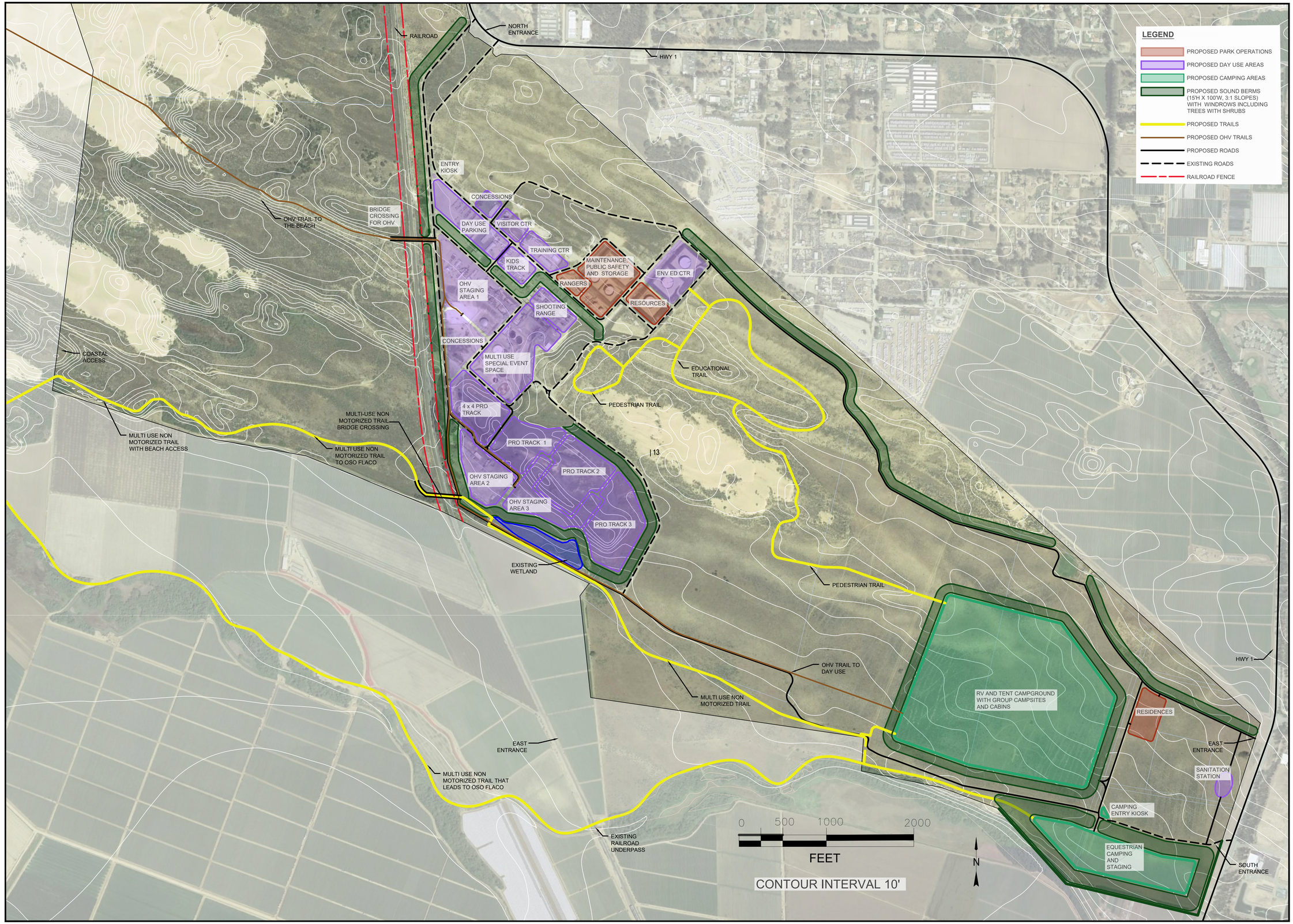
We don't know where this project will end up given that much of this area is Environmentally Sensitive Habitat Area. That said, we hope that the APCD Executive Director and Board will stand up for the protection of public health. It makes no sense to spend millions on mitigation in the ODSVRA to stop the dust plume it creates and then open a new area of riding CLOSER to the homes. See attached diagram from the plan.

We are planning on providing public comment at the January 27th meeting.

Sincerely,

Arlene Versaw and Rachelle Toti
Co-founders of Concerned Citizens for Clean Air

Cc: Dan Carl, Deputy Director, Coastal Commission
Kevin Kahn, Supervisor, Coastal Commission
Richard Corey, Executive Officer, Calif. Air Resources Board



CALIFORNIA STATE PARKS SINCE 1864

ACQUISITION & DEVELOPMENT DIVISION
One Capitol Mall
Sacramento, CA
95814-3229

CALIFORNIA STATE FIRE MARSHAL- APPROVED

Approval of this plan does not authorize or approve any omission of deviation from applicable regulations. Final approval is subject to field inspection. One set of approved plans shall be available on the project site at all times.

Reviewed by Date

DPR ACCESS COMPLIANCE REVIEW
ACCESSIBILITY SECTION
CERTIFICATION #

Reviewed by Date

ACCESSIBILITY COMPLIANCE AND STATE FIRE MARSHAL SIGNED ORIGINALS ARE ON FILE AT THE DEPARTMENT OF PARKS AND RECREATION, NORTHERN SERVICE CENTER

DESIGNED:	**G. STRNAD**
DRAWN:	**C. MAXWELL**
CHECKED:	**G. STRNAD**
DATE:	**NOV 2020**

REVISIONS	
△	DATE

SOUTHERN ENTRANCE PROJECT
FUTURE PROJECT CONCEPT

DRAWING NO.
A8

SHEET NO.
105a
OF **105**

Concerned Citizens for Clean Air

Jan 22, 2021

Dear Director Ainsworth and Coastal Commissioners,

Concerned Citizens for Clean Air supporters predominately live on the Nipomo Mesa. In the recently released Pismo Beach and Oceano Dunes draft Public Works Plan and EIR there are two proposed projects that would greatly affect our neighborhoods. They are the development of the Oso Flaco Lake area and the development of the Phillips 66 property. We are writing to you today to bring this ill-conceived development to your attention.

Not only would the plan destroy a beautiful natural area enjoyed by many (Oso Flaco Lake) it would also expand the ODSVRA camping, and OHV riding area by hundreds of acres. Oso Flaco would receive 300 plus campsites with restrooms/shower facilities plus over 250 parking spots and housing for permanent State Parks staff. It would change the tranquil area into a 24-hour party spot and drive away all the wildlife that now resides there. The traffic, noise, air pollution and light pollution would be horrendous.

The Phillips 66 site is farther down the timeline but still a nightmare. It would have two entrances off Highway 1; a visitor center; concession area; OHV training facilities; special event area; 33 acre pro track for motocross and ATV racing; historical museum; day use area; 225 RV campsites; 50 tent campsites; 75 equestrian campsites; six group campsites for between 10 and 50 campers; 20 Dunite-style cabins; restrooms/showers and parking for all of the above and of course entry ways into the original ODSVRA back dunes. It also includes a weapon range for peace officer training serving State parks districts and allied agencies statewide, see page 3-57 of the plan.

Needless to say, Concerned Citizens for Clean Air opposes these two projects and the air pollution they will create. Who knew State Parks OHV Division would try to bring the air pollution emissions from the Oceano Dunes SVRA closer to the homes and sensitive receptors living on the Nipomo Mesa?? Your immediate attention is needed to stop this slow-moving train wreck. Please review the draft PWP/EIR, we are planning on providing public comment at your next meeting on February 10 – 12.

Respectfully,

Arlene Versaw and Rachelle Toti
Co-founders of Concerned Citizens for Clean Air

Cc: Wade Crowfoot, Director of Natural Resources
Armando Quintero, Director of State Parks
Dan Carl, Deputy Director
Kevin Kahn, Supervisor

FW: night ride event on oceano beach friday night

Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>

Fri 1/22/2021 8:04 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Oceano Beach Community Association <oceanobeachca@gmail.com>
Date: Friday, January 22, 2021 at 11:37 AM
To: Pearce, Kevin@Parks <Kevin.Pearce@parks.ca.gov>
Cc: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>, Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>, Lynn Compton <lcompton@co.slo.ca.us>
Subject: night ride event on oceano beach friday night

Dear Mr. Pierce,
We became aware of the following:
https://www.facebook.com/events/167351504789199/
Our beach is being used as a cruise strip. This is a call to an event during the pandemic. It should not be permitted. We ask that plenty of enforcement be out there to protect pedestrians. The last few weeks on Oceano Beach have been horrendous and unbearable. The drivers gang up on our beach and harass us. They know who we are and make it unsafe for us to walk our beach. They parade their hate flags back and forth all day long. The same hate flags that assaulted the Capitol 2 weeks ago.
Furthermore, we have been alerted by residents that the 8:00 pm curfew is not being enforced. Vehicles still drive on the beach long into the night. We also have seen people camping in the dunes. Obviously, you are not **"containing the nuisance"** which was the purpose of establishing SVRAs in the first place with the OHV statute.
Please do your job and enforce the law. Thank you

Best,
Lucia Casalinuovo
Oceano Beach Community Association
oceanobeach.org

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Fri 1/22/2021 3:54 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Mark Miller (markm80477@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Friday, January 22, 2021 6:46 AM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Mark Miller
653 Raymond Ave
Santa Monica, CA 90405
markm80477@gmail.com
(415) 819-4340

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

FW: off road article

Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Thu 1/21/2021 7:46 PM
To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Bonita Ernst <bonnie@pacificcoastpro.com>
Sent: Thursday, January 21, 2021 10:04 AM
To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Subject: off road article

FYI - January 2021 issue:

Ad opposes the gas tax - where do they think the OHV money comes from?
Also says "Friends" has 7 legal actions set for court in 2021.
Also states they "are losing the battle in the court of public opinion".



Christmas memories at Oceano Dunes SVRA

re-layout the park with effective change increasing OHV activity, expanding camping opportunities, and making the SVRA a good neighbor to the community. Here we are 5 years later, and the vision of this new park has been hijacked by a new administration, new State Park leadership, and an overreaching Coastal Commission. What once held the promise to be upgraded recreational opportunities has now become the poster child for mismanagement in State Government and pet projects that offer no benefit to the OHV community. The next version of the PWP draft is set at time of this writing to be made public by late December and State Parks will be seeking comments from the public.

Second, the renowned Scripps Institute of Oceanography continues to monitor the dust surrounding the Oceano Dunes and provide their findings to State Parks and the local Air Pollution Control District (APCD). Their recent findings from a spring time study published on September 20, 2020 states:

"The association of high PM10 and PM2.5 with high wind conditions, even when recreational vehicles were not allowed at Oceano Dunes, indicates that dune-derived mineral dust is more likely to be caused by natural forces (i.e. wind) rather than human activities. While the short duration of this study provides only limited statistics in support of this result, the longer records provided by APCD provide additional confirmation. For this reason, the high dust concentrations measured on high wind days in and downwind of Oceano Dunes are likely dominated by natural saltation processes associated with the indigenous geomorphological dune structure."

The wind is causing the sand to blow, not vehicle activity. The science is on the side of the OHV Community but we are losing the battle in the court of public opinion.

In short, the wind is causing the sand to blow, not vehicle activity. The science is on the side of the OHV Community but we are losing the battle in the court of public opinion. The local Air Pollution Control District continues with their narrative that OHV is causing increased dust levels in the surrounding community. The APCD has made this their rally cry for years and continue to change their narrative when presented with scientific information proving them wrong. When you shout something long enough people will believe it; the APCD has done just that and decision makers refuse to listen to the proven science. State Parks knows they are in the right scientifically and it baffles me why they refuse to stand up for themselves and the park visitors! The current dust mitigation measures suggested by the APCD's scientists, and installed by State Parks, are not based on science, but the hunch of a scientist employed by the APCD. Again this is another example of poor management by the State Park system, the same State Parks system meant to increase ALL recreational activities for ALL Californians.

Friends of Oceano Dunes has 7 legal actions set for court in the early part of 2021. We are continuing to fight to keep camping and OHV recreational opportunities at the Oceano Dunes. It's times like these that historical parks like Oceano needs to bring us all together to fight for the common good. Without a strong base fighting for land use we can expect our SVRAs and other OHV areas to face the same fate as Oceano. OHV areas that were once out in rural communities have now been encroached upon by urban sprawl. The time is now to stand up, speak up, and be heard. To follow the progress at Oceano and see how you can get involved visit us on Facebook at, Friends of Oceano Dunes, or on our website www.oceanodunes.org

Wishing you a Happy New Year filled with joy!

Friends of Oceano Dunes is a 501(C) (3) non-profit organization. No salaries are paid; we are a 100% volunteer organization.





Fw: Environmental Justice and Equality for Oceano

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Thu 1/21/2021 5:06 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: bill house <pirate805@gmail.com>
Sent: Monday, January 18, 2021 9:40 AM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; CNRA COPC Public <COPCPublic@resources.ca.gov>; Quintero, Armando@Parks <Armando.Quintero@parks.ca.gov>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>; Nnix@co.slo.ca.us <Nnix@co.slo.ca.us>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Dawn@dawnaddis.org <Dawn@dawnaddis.org>; info@lairdforcasenate.com <info@lairdforcasenate.com>; Glimon@caleja.org <Glimon@caleja.org>; Maricela@causenow.org <Maricela@causenow.org>; Tiffany@caleja.org <Tiffany@caleja.org>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Hharmon@slocity.org <Hharmon@slocity.org>
Subject: Environmental Justice and Equality for Oceano

Just like when Pismo Beach made it illegal to drive vehicles on the beach we heard all the old doom and gloom predictions.Then we cleaned up and restored Avila Beach, the Phillips 66 refrinery is now closing down and the Diablo Canyon Nuclear Plant will soon be closed. Working together we continue to make progress on making our communities more healthy and safe.

The Diablo Canyon nuclear power plant was once considered a good idea when it was built, through science and research we realize we were wrong and it needed to be closed to protect public health and the environment. The Oceano Dunes State Park is a lot like Diablo Canyon, we have learned a lot about the science, data, research and facts. Over time we have come to realize that major changes are needed to protect public health, the environment and environmental justice communities. In March, the Coastal Commission will have the opportunity to make these much needed changes to the Oceano Dunes State Park conditional use permit. Clearly the evidence is overwhelming that we can no longer put our coast, natural resources and communities at risk.

We continue to support the compromise Coastal Commission recommendations for the Oceano Dunes State Park. It is my hope that consideration will be given to the immediate closing of the Pier Avenue entrance in Oceano. The healing and rebuilding cannot begin for Oceano until the Pier Avenue entrance is Closed.

#10.30.2020

Fw: New Vision for Oceano- First 100 Days - Environmental Justice

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Thu 1/21/2021 5:06 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: bill house <pirate805@gmail.com>
Sent: Tuesday, January 19, 2021 8:36 AM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; Office of the Secretary CNRA <secretary@resources.ca.gov>; Gold, Mark@CNRA <Mark.Gold@resources.ca.gov>
Cc: Lcompton@co.slo.ca.us <Lcompton@co.slo.ca.us>; Jpaulding@arroyogrande.org <Jpaulding@arroyogrande.org>; Lreynolds151@gmail.com <Lreynolds151@gmail.com>; Oceanobeachca@gmail.com <Oceanobeachca@gmail.com>; Sierraclub8@gmail.com <Sierraclub8@gmail.com>; Jmiller@biologicaldiversity.org <Jmiller@biologicaldiversity.org>; Dunesalliance@gmail.com <Dunesalliance@gmail.com>; CCCA3858@gmail.com <CCCA3858@gmail.com>; Nnix@co.slo.ca.us <Nnix@co.slo.ca.us>; Bgibson@co.slo.ca.us <Bgibson@co.slo.ca.us>; Tkeith@co.slo.ca.us <Tkeith@co.slo.ca.us>; Gwilley@co.slo.ca.us <Gwilley@co.slo.ca.us>; Pborenstein@co.slo.ca.us <Pborenstein@co.slo.ca.us>; Info@connieleyva.com <Info@connieleyva.com>; info@lairdforcasenate.com <info@lairdforcasenate.com>; Hharmon@slocity.org <Hharmon@slocity.org>; Glimon@caleja.org <Glimon@caleja.org>; Tiffany@caleja.org <Tiffany@caleja.org>; Maricela@causenow.org <Maricela@causenow.org>; Directorvilla@oceanocsd.org <Directorvilla@oceanocsd.org>; Directorreplogle@oceanocsd.org <Directorreplogle@oceanocsd.org>
Subject: New Vision for Oceano- First 100 Days - Environmental Justice

We are looking forward to making Environmental Justice history in Oceano. Closing Pier Avenue entrance and creating Safe Beach Access Zone for visitors and residents that will allow businesses to expand and create jobs should be a major priority. It is important to make this part of the first 100 days of the new revised conditional use permit plan.

After 38 years of neglect and discrimination it is time to begin the healing and revitalization efforts in Oceano. The Coastal Commission can no longer give permission to the OHV Division to maintain economic and public health sacrafice zones with disposable people. We have learned that a slow rollout will only bring more of the same negative outcomes for public health, the environment, economic and social justice for five more years.We must all ask ourselves if this is resonable and logical.

I believe we need a 100 day timeline plan on Pier Avenue and Oceano Safe Beach Access Zone because we are going to see funding for revitalization and infrastructure coming from the State and Federal Government. Clearly it should be a goal for all of us to lift up low income communities as well as those living in designated opportunity zones. If we miss this opportunity in March it will never come again in our lifetime. We need the help of the Coastal Commission to make this possible. In five years the funds will be gone !

This becomes a once in a lifetime opportunity for the Coastal Commission and Oceano. It is the time to place the needs of environmental justice communities first over an organization that has created so much harm and destruction.

#10.30.2020

Dear Commission,

My husband and I walked Oso Flaco Lake today and what a joy it was to see the many bird: Ducks, White Pelicans. We even saw racoons. At the end of the trail is the most beautiful view of the ocean and dunes.

Please do not let this one-of-a-kind area be ruined by off roaders and campgrounds. I have seen what has happend to the dunes in Oceano.

I grew up in Arroyo Grande. There used to be more butterflys, trees and habitats for wild life. The dunes were higher and more pristine. Snowy Plovers did not have to worry about their existence and, probably most important, the air quality was healthy! Unfortuneately not true any more.

Please do not let this happen to Oso Flaco Lake and Dunes. Fees could be raised if needed to insure its care and maintenance. I'm sure no one would complain. It's well worth some extra money to leave it untouched.

Thank You,

Sue Whitehead

Sue Whitehead

David Whitehead

David Whitehead

874 Alyssum Ct
San Luis Obispo, CA 93401

RECEIVED
DEC 15 2020
CALIFORNIA
COASTAL COMMISSION

Pismo State Beach and Oceano Dunes State Vehicular Recreation Area Draft Public Works Plan and Draft Environmental Impact Report (December 2020)

Holly Holly Sletteland <hslettel@calpoly.edu>

Wed 1/20/2021 6:40 PM

To: OceanoDunes.PWP.EIR@parks.ca.gov <OceanoDunes.PWP.EIR@parks.ca.gov>
Cc: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

I am so disappointed to see your recently released draft PWP and EIR to further develop the Oceano Dunes State Vehicular Recreation Area (SVRA). It doesn't appear that you have listened at all to the many voices that have already spoken out against this project. The impacts of the existing operations have been a source of controversy for decades, especially allowing motorized vehicles to destroy sensitive dune habitat, threatening a number of protected species and undermining the health of local residents with harmful air and noise pollution. And yet this proposal promises to greatly exacerbate all of those issues by expanding access to significantly more people and vehicles. An awful lot of people can be put up in 200 RV campsites, 100 drive in tent sites, and 20 cabins. They can also entertain a lot of friends in the cornucopia of new parking spaces – 60 spaces for regular vehicles and 40 spaces for large vehicles, like buses, RVs and trailers. And then, of course, you need to have support for all this access - dump stations, restrooms/ showers, convenience stores, staff accommodations. Needless to say, providing all this access to the great outdoors requires paving over a lot of it in the process – 120 acres in a designated Environmentally Sensitive Habitat Area (ESHA) adjacent to idyllic Oso Flaco Lake, to be exact.

This proposal not only doesn't solve any of the existing environmental impacts associated with operating the park as a state vehicular recreation area, but it will inevitably make them much, much worse. It also ignores the fact that much has changed since people started driving on the dunes in the early thirties. Some of the most alarming are population growth, which in turn is driving climate change and biodiversity loss. Global population has increased exponentially from just over 2 billion people in 1930 to almost 8 billion today. In San Luis Obispo County, we've seen a ten-fold increase from almost 30,000 to almost 300,000. Carbon emissions have increased from 3.93 billion metric tons in 1930 to 36.44 billion in 2019, and the disastrous effects of climate change such as wildfires, droughts, hurricanes, heatwaves and more are already upon us. Biodiversity is plummeting and the losses are accelerating. Monitoring studies have indicated that vertebrate populations have declined by 68% over the last five decades (WWF,2020) and over 1 million species are currently threatened with extinction. Although abundant solutions are available, they are being implemented at a scale and pace that is woefully inadequate to address the magnitude of the problems.

We need to reduce our carbon emissions rapidly to net-zero to avert the most catastrophic effects of climate change and yet State Parks proposes to increase them for absolutely unnecessary activities with this project. We desperately need to protect more natural areas to stem the loss of biodiversity, and yet State Parks proposes that we endanger vulnerable species and pave over more of their habitat. We also need more natural areas to support a growing human population that needs access to the outdoors, but rather than serve the overwhelming majority of the population that don't recreate using ORVs, State Parks is bowing to a vocal minority of off-roaders.

I don't know what unreality State Parks is living in, but it's time to shelve this proposal and come up with a plan for Oceano Dunes that promotes passive recreation, habitat restoration and climate friendly, sustainable development to support public access.

Holly Sletteland

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Wed 1/20/2021 4:17 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Amy Suh (amysuhh@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Tuesday, January 19, 2021 5:58 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Amy Suh
4206 Suzanne Dr
Palo Alto, CA 94306
amysuhh@gmail.com
(650) 862-1651

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Draft Environmental Impact Report for Pismo State Beach and Oceano Dunes

Bonnie Thompson <bthompson.xyz@gmail.com>

Tue 1/19/2021 10:14 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Dear California Coastal Commission Officials,

I implore you not to increase camping and off-roading at Pismo State Beach and the Oceano Dunes.

This is a valuable and special place for hikers and birders--all of that will be gone if the proposed development goes through.

Too, this will only worsen the disastrous air quality on the Nipomo Mesa and the surrounding area. At a time when climate change is causing more frequent and dramatically worse wildfires, our air quality has become ever more precious. It is literally the air we breathe. There is nothing--nothing--worth jeopardizing that for.

Given the known and accepted health hazards of the current level of off-roading on the dunes, I am alarmed that expansion of that activity is even being considered. It defies all logic.

The proposed DEIR would destroy Oso Flaco Lake as a special, extremely valuable, and even critical bird habitat and a sought-after birding location. It would be a terrible loss for the people who live in this county--as well as those who come here for the peace and nature that area affords.

It would also mean literal death for the birds, both resident and migratory. With encroaching development everywhere, there are not enough wild places left for birds, Unless you'd be happy in a world in which all birds are either seagulls or pigeons, you'd do well to protect the diversity of birds the Oceano Dunes and the Pismo area protect.

Both residents and visitors will be deprived of many things if this expansion goes through, including:
--a peaceful place to stroll on the beach
--a quiet place where someone unable to stroll can at least watch the sunset
--a bulwark against erosion, in a time of rising tides
--a drastic loss of native plants, without which the local wildlife can’t survive—and without which the beach is nothing but a sandy parking lot

In short, there is everything to be lost, and the only thing to be gained is an activity that is likely to be phased out. The expense of constructing something only to de-construct it later will seem like an enormous boondoggle.

Thank you for your time.

Sincerely yours,
Bonnie Thompson
Los Osos

FW: Coastal Commission Accepting Email Comments! RE: Help! Save Oso Flaco Lake Natural Area

NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Thu 1/7/2021 9:12 PM

To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Kara Woodruff <KWoodruff@blakeslee-blakeslee.com>
Sent: Thursday, January 7, 2021 11:29 AM
To: 'karaslo@charter.net' <karaslo@charter.net>
Subject: Coastal Commission Accepting Email Comments! RE: Help! Save Oso Flaco Lake Natural Area

Greetings, again, everyone. After sending out the below message yesterday about Oso Flaco Lake, we heard back from the **California Coastal Commission** and it has established an email where all public comments relating to Oso Flaco Lake, the PWP/EIR, and the Oceano Dunes in general, can be submitted to that agency. This is great news – perhaps our voices will finally be heard.

Thus, please **copy any and all emails** you've sent to State Parks **to the Coastal Commission**, to this address:

OceanoDunesReview@coastal.ca.gov

As a reminder, the State Parks email address is:

OceanoDunes.PWP.EIR@parks.ca.gov

**Please send public comments about Oso Flaco Lake to BOTH email addresses.*

Also:

- The Coastal Commission is planning a hearing on all of this, tentatively scheduled for March 18, 2021 – more details to follow;
- The Coastal Commission will be adding an Oceano Dunes space on its main web page soon, so look for that at www.coastal.ca.gov; and
- If anyone has any specific questions for the Coastal Commission, you may contact Kevin Kahn (the Coastal Commission lead on all things Oceano/dunes related) directly at kevin.kahn@coastal.ca.gov.

Thank you again – please speak up and save Oso Flaco Lake! Kara

Kara Woodruff
Central Coast Conservation
Friends of Oso Flaco Lake

From: Kara Woodruff <KWoodruff@blakeslee-blakeslee.com>
Date: Wednesday, January 6, 2021 at 2:24 PM

To: 'karaslo@charter.net' <karaslo@charter.net>
Subject: Help! Save Oso Flaco Lake Natural Area

January 6, 2021

Greetings to conservationists and the friends and supporters of the Oso Flaco Lake Natural Area:

We need your help. California State Parks has proposed a plan that will destroy Oso Flaco Lake as we know it. Please read below and speak up to save this treasured region of the Central Coast.

Here's the background:

State Parks just issued its draft Public Works Plan ("PWP") and accompanying draft Environmental Impact Report for Pismo State Beach and the Oceano Dunes SVRA. (To see the full draft PWP, visit https://www.oceanodunespwp.com/en/documents/draft-eir)

Unfortunately, the draft PWP arrogantly ignores hundreds(!) of public comments submitted in the last few years to promote the conservation of the beautiful Oso Flaco Lake Natural Area. Instead, yet again, State Parks has released a plan that would aggressively develop and completely transform the area. State Parks calls this ill-conceived and disastrous plan the "Oso Flaco Lake *Improvement* Project" – but it's surely no improvement.

Here's what the proposed Oso Flaco "Improvement" Project (initial and future) includes (see attached for more details):

- The conversion of 120 acres of prime agricultural and dune land, located in a designated Environmentally Sensitive Habitat Area (ESHA);
- 200 RV campsites and with 12 restroom/shower buildings;
- 100 drive in tent sites with 8 restroom/shower buildings;
- 20 cabins;
- 40 parking spaces for large vehicles, including RV's, buses, and trailers; 60 parking spaces for additional parking; 45 parking spaces for fleet and emergency response vehicles (including ATV's, trailers, and watercraft); 95 parking spaces for year-round staff parking; and 30 parking spaces for seasonal staff parking;
- Many, many other structures and facilities including three new dump stations, a half-acre multi-purpose area, permanent concession buildings with a camper convenience store, amphitheater, office buildings, staff residences, maintenance and storage equipment and facilities, and single and multi-family residences for year-round and seasonal staff; and
- A new vehicle trail connecting the above Oso Flaco Lake development to a new southern entrance to the Oceano Dunes off-highway vehicle driving area.

In short, State Parks wants to transform this special, tranquil, and ecologically rich region into a noisy hub of commercial activity at the expense of its wildlife and its present use by local communities, school groups, and others for passive recreational activities.

Not only is this wrong, it's contrary to the Coastal Act, which protects ESHAs such as Oso Flaco Lake against "any significant disruption of habitat values." The Coastal Act also specifically calls for the maintenance of prime agricultural land, not the conversion of ag land contemplated by the PWP.

For these reasons, the PWP's Oso Flaco "Improvement" project is opposed by the Center for Biological Diversity, the Morro Bay Audubon Society, the Friends of Oso Flaco Lake, and many others.

But we need your voice, too. Tell State Parks (AGAIN!) to reject the PWP plans for the Oso Flaco Lake Natural Area and keep it in its natural state. Please email your comments by March 2, 2021 to: OceanoDunes.PWP.EIR@parks.ca.gov

Or, mail comments to this address:

California State Parks
Strategic Planning and Recreation Services Division
1725 23rd Street, Suite 200
Sacramento, CA 95816
Also, to keep updated on the PWP process, please subscribe to the State Parks email list at:

https://oceanodunespwp.com/en/contact

Thank you for your help in protecting the Oso Flaco Lake Natural Area. Please, tell your friends and spread the word. It's now or never.

If you have any questions or need more information, let us know. Thank you, Kara

Kara Woodruff
Central Coast Conservation
Friends of Oso Flaco Lake

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Mon 1/18/2021 10:40 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Annmarie McGuffin (akmcguffin@comcast.net) Sent You a Personal Message <automail@knowwho.com>
Sent: Monday, January 18, 2021 10:06 AM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Annmarie McGuffin
2236 Howard Avenue
San Carlos, CA 94070
akmcguffin@comcast.net
(650) 576-5480

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Fri 1/15/2021 4:35 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Sovo Vonkaenel (sovorunner@gmail.com) Sent You a Personal Message
<automail@knowwho.com>
Sent: Thursday, January 14, 2021 9:26 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Sovo Vonkaenel
27925 Encanto
Mission viejo, CA 92692
sovorunner@gmail.com
(949) 880-8497

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

RE: Ohv closure

EnvironmentalJustice@Coastal <EnvironmentalJustice@coastal.ca.gov>

Fri 1/15/2021 3:45 PM

To: lcg1032006@gmail.com <lcg1032006@gmail.com>; EnvironmentalJustice@Coastal <EnvironmentalJustice@coastal.ca.gov>
Cc: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Hello,

I am sending your comments to oceanodunesreview@coastal.ca.gov. Coastal Commission staff working on Oceano Dunes are taking comments about this item at that email address.

Best,
Sumi

-----Original Message-----
From: lcg1032006@gmail.com <lcg1032006@gmail.com>
Sent: Tuesday, January 12, 2021 1:49 PM
To: EnvironmentalJustice@Coastal <EnvironmentalJustice@coastal.ca.gov>
Subject: Ohv closure

Hi, my name is Logan Garcia and my family and I along with countless other individuals go to the dunes every year as a family tradition. Some family members and great friends have passed and loves pismo and we try to make an effort to go every year to represent them. The birds are beautiful but I don't think they can be part of a reason to shut down something that countless amounts of people love. And the town has figured out the ohv has not caused all of the sand blown into the town. Since we have been going for so long we know the dunes really well and the wind gets ridiculous and that what causes it. This is a place for people and family's to have fun and experience a lot of things. When I have kids I want them to go to pismo and experience that but with all of the environmentalist and unthoughtful people that want to shut it down this is probably not possible. Sorry if I'm being rude but I think it's bs and the dunes need to remain open. SAVE OUR DUNES!!!!!

RE: the dunes

EnvironmentalJustice@Coastal <EnvironmentalJustice@coastal.ca.gov>

Fri 1/15/2021 3:44 PM

To: Ronnie C <rkcnag805@yahoo.com>; EnvironmentalJustice@Coastal <EnvironmentalJustice@coastal.ca.gov>
Cc: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

Hello,

I am sending your comments to oceanodunesreview@coastal.ca.gov. Coastal Commission staff working on Oceano Dunes are taking comments about this item at that email address.

Best,
Sumi

From: Ronnie C <rkcnag805@yahoo.com>
Sent: Monday, January 11, 2021 6:24 PM
To: EnvironmentalJustice@Coastal <EnvironmentalJustice@coastal.ca.gov>
Subject: the dunes

I feel strongly against the reopening of the dunes. Between the drunk driving and accident related injuries and deaths, it isn't worth it for a couple hours of fun.
Also with the covid spread it isn't practical to have people co-mingling.

I've lived here for 30 years and I'm beyond over the use of our police and emergency vehicle resources to rescue people who are irresponsible.
The only way to prevent more deaths, littering our beaches and preservation of nature is to stop dune access completely. If people want to enjoy our beaches they can walk on.
Thank you
V. Sanders

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Thu 1/14/2021 2:41 AM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Caitlin DiCarlo (cjd611@yahoo.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Wednesday, January 13, 2021 5:19 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Caitlin DiCarlo
2571Violet Street
San Diego, CA 92105
cjd611@yahoo.com
(760) 525-5047

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Tue 1/12/2021 5:32 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Amanda Matheson (apanda1@gmail.com) Sent You a Personal Message
<automail@knowwho.com>
Sent: Tuesday, January 12, 2021 9:13 AM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Amanda Matheson
4607 Torrey Circle, U206
San Diego, CA 92130
apanda1@gmail.com
(720) 548-8734

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Fw: Regarding Keeping Oceano Dunes

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Tue 1/12/2021 4:57 PM
To: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

From: Katherine Christensen <alohakate1@icloud.com>
Sent: Monday, January 11, 2021 6:14 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: Regarding Keeping Oceano Dunes

Comments on the California State Parks draft Public Works Plan.

To the California Coastal Commissioners,

I understand that the California State Parks has drafted a Public Works Plan. This plan includes a Habitat Conservation Plan and an Environmental Impact Report. All documents must be reviewed and approved by state and/or federal agencies before they can be implemented. Until State Parks receives these approvals, the park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. Aside from these statutory reasons, the COVID-19 situation demands that the beach and dunes remain closed to vehicular recreationists, most of whom come from outside the local region. The current draft Public Works Plan has many problems and allows far too much environmental impact. During the closure, all parties should work together to develop solutions that advance real conservation of natural resources and environmental justice for the local communities, for California and for the world.

The Oceano sand dune area is recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades. And then, due
to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds. At its earliest opportunity, California State Parks intends to reopen the park to vehicle use, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety. It is time to act responsibly for the health and preservation of the environment which will in fact aid the economy for decades to come.

People for the Dunes campaign advances a new, inclusive vision of recreation and conservation at Oceano Dunes without OHVs that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area's

cultural heritage. Protecting the Oceano Dunes will result in the economic future of the Central Coast and California for generations to come. Wild spaces must be protected or they will be destroyed. Now is the time to act.

I am asking the to please Commissioners to adopt recommendations that will preserve the natural resources of this extraordinary area and allow access for all.

Thank you,

Sincerely,

Kate Christensen

1501 See Canyon Road
San Luis Obispo, CA 93405
410 919 7521

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Mon 1/11/2021 11:02 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Ellen Ma (butterflyworld98@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Monday, January 11, 2021 2:01 PM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Ellen Ma
1519 S Mary Ave
Sunnyvale, CA 94087
butterflyworld98@gmail.com
(408) 930-3408

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

FW: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>

Mon 1/11/2021 9:09 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>

-----Original Message-----
From: Jennifer von Bleichert (jennifer.vonbleichert@gmail.com) Sent You a Personal Message <automail@knowwho.com>
Sent: Monday, January 11, 2021 11:42 AM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>
Subject: Protect Oceano Dunes from Destructive Off-Highway Vehicle Impacts

Dear Executive Director Jack Ainsworth,

The Oceano Sand Dunes are recognized by scientists, conservationists, government agencies and the public as the finest, most extensive coastal dunes remaining in California. The beach and dunes offer critical habitat for endangered shorebirds and other rare plant and animal species. Unfortunately, off-highway vehicle (OHV) activity has been allowed to degrade this beautiful area for decades.

Due to the COVID-19 pandemic, Oceano Dunes was closed in March to all vehicle activity. Since the closure, the dunes and beach have transformed into a vibrant, safe and clean environment for beachgoers of all kinds.

California State Parks recently drafted a Public Works Plan, a Habitat Conservation Plan and an Environmental Impact Report for the area. All of these documents still need to be reviewed and approved by state and/or federal agencies before they can be implemented.

However, at its earliest opportunity, California State Parks intends to reopen the park to vehicle use before these plans are approved, which will reimpose immediate threats to wildlife, sensitive habitats and community health and safety.

Surfrider and our partners would like to see a new, inclusive vision of recreation and conservation at Oceano Dunes that will secure environmental justice for surrounding communities, ensure better protection for wildlife and the natural environment, boost the local economy and respect the area?s cultural heritage.

Until State Parks receives necessary approvals on Public Works and Habitat Conservation Plans, as well as the EIR, the Park should remain closed to OHV activity to prevent continued violations of the Endangered Species Act, the California Coastal Act and the Local Coastal Program. In the interim, all parties should continue to develop solutions that advance real conservation of natural resources and environmental justice for the local communities.

I implore you, as a state agency leader, to adopt recommendations that will keep Oceano Dunes closed to OHV use until the Public Works Plan, Habitat Conservation Plan and the Environmental Impact Report have been approved and implemented.

Sincerely,

Jennifer von Bleichert
1 Olive Court #303
Redwood City, CA 94061
jennifer.vonbleichert@gmail.com
(650) 619-8343

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Surfrider. If you need more information, please contact Michelle Kremer at Surfrider at mkremer@surfrider.org or (949) 492-8170.

Guadalupe-Nipomo Dunes Preserve Management Plan

Kara Woodruff <KWoodruff@blakeslee-blakeslee.com>

Mon 1/11/2021 8:49 PM

To: Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Cc: OceanoDunesReview@Coastal <OceanoDunesReview@coastal.ca.gov>

1 attachments (6 MB)

Guadalupe-Nipomo Dunes Preserve Management Program TNC and CA Coastal Conservancy.pdf;

Greetings, Mr. Kahn and Mr. Carl:

Please find attached the Management Plan for the Guadalupe-Nipomo Dunes Preserve, which was published 1999 by The Nature Conservancy and the California Coastal Conservancy.

Of particular interest may be the map on pages 22A and 22B, which characterizes the “Tosco Buffer Area” – aka Phillips 66 land – as a “protected property,” and yet its development is being considered by State Parks OHV in its draft Public Works Plan. You may also wish to read the history of the Phillips 66 (Tosco Property) on page 20.

The management plan may also be of interest in providing a history of and resources found at the Oso Flaco Lake Natural Area (page 18). For reasons we will explain via public comment, the Friends of Oso Flaco Lake and many others will be opposing the PWP plans for Oso Flaco, as being highly disruptive to the environment at Oso Flaco and undermining the experience for local residents and other visitors, as well as the area’s ecology.

Finally, you may also wish to reference the plan’s discussion of resources found on the Guadalupe-Nipomo Dunes, in Section III (starting at Page 23), Section V (starting at Page 53), and Appendices C, D, and E.

Thank you for your consideration; please let me know if you have any questions; best wishes, Kara

Kara A. Woodruff



Guadalupe-Nipomo Dunes Preserve

Management Program

April, 1999

Prepared by:

The Nature Conservancy

Coastal Conservancy

Crawford Multari Clark & Mohr

Contents

Chapter — Page

Executive Summary 1

I. Introduction 5
A. The Guadalupe-Nipomo Dunes 5
B. The Guadalupe-Nipomo Dunes Preserve 6
C. History of the Preserve 7
D. Purpose of the Management Program 8
E. Organization of the Management Program 9
F. Approval Process and Legal Status of the Management Program . . . 10

II. Management Units of the Guadalupe-Nipomo Dunes Preserve 11
A. Background 11
B. Transition Program of The Nature Conservancy 11
C. Description of Properties within the Preserve 12
1. Mobil Coastal Preserve (The Nature Conservancy) 12
2. Rancho Guadalupe Dunes County Park (County of Santa Barbara) 13
3. Black Lake (The Nature Conservancy) 15
4. Pismo Dunes Natural Preserve (California Department of Parks and Recreation) 17
5. Other Protected Properties 18

III. Resources of the Guadalupe-Nipomo Dunes Preserve 23
A. Introduction 23
B. Morphology of the Dunes 23
C. Surface Water 24
D. Ecological Resources of the Preserve 25
1. Classification Schemes for Sensitive Plant and Animal Species . . 25
2. Plants of the Guadalupe-Nipomo Dunes Preserve 28
3. Sensitive Plant Species 33
4. Animals of the Guadalupe-Nipomo Dunes Preserve 38
E. Cultural Resources of the Preserve 43

IV. Management Structure for the Guadalupe-Nipomo Dunes Preserve 44
A. Introduction 44
B. Institutional Framework for Management of the Preserve 44
1. Dunes Center 45
2. Dunes Forum 46
3. Dunes Council 46
4. Scientific/Technical Advisory Committee 47
5. Program Manager 48
C. Management Agreements 51

Contents (cont'd)

V. Management of the Preserve's Natural and Cultural Resources 53
A. Introduction 53
B. Management of Ecological Resources 55
C. Management of Public Access and Recreation 59
D. Management of Public Interpretation and Education 64
E. Management of Cultural Resources 67

VI. Into the Future 69
A. Introduction 69
B. Conservation Easements 69
C. Criteria for Evaluating Potential Additions to the Preserve 70
D. Expansion of the Preserve 71

VII. Epilogue 74

VIII. Appendix 75
A. Authors 75
B. Bibliography 76
C. Plants of the Guadalupe-Nipomo Dunes Preserve and Vicinity 78
D. Birds of the Guadalupe-Nipomo Dunes Preserve and Vicinity 86
E. Selected Invertebrates, Mammals, Reptiles and Amphibians of the Guadalupe-Nipomo Dunes Preserve and Vicinity 91
F. Documents and Studies of the Guadalupe-Nipomo Dunes 93

Tables

Table 1: Classification Schemes for Sensitive Plant and Animal Species . . . 27
Table 2: Summary of Acreage By Habitat Type Guadalupe-Nipomo Dunes 33
Table 3: Sensitive Plant Species of the Guadalupe-Nipomo Dunes 35
Table 4: Summary of Species Ranked by Classification 37
Table 5: Sensitive Animal Species of the Guadalupe-Nipomo Dunes 41
Table 6: Examples of Responsibilities of the Program Manager 49
Table 7: Criteria for Setting Priorities for Expansion of the Preserve 73

Figures

Figure 1: The Guadalupe-Nipomo Dunes Preserve 22
Figure 2: Generalized Map of Habitat Communities 42

Executive Summary

". . . for in the end,
our society will be defined
not by what we create,
but by what we refuse to destroy."

This Management Program for the Guadalupe-Nipomo Dunes Preserve updates and replaces the 1991 Management Plan. Its general purpose is to provide the public with updated information about the Guadalupe-Nipomo Dunes Preserve, including its ecological resources, permitted human uses, and present ownership and management structure.

The Management Program describes the properties that presently comprise the Preserve. These properties are the Mobil Coastal Preserve, the Pismo Dunes Natural Preserve, the Rancho Guadalupe Dunes County Park, and the Black Lake area. In addition, it generally describes those properties within the Guadalupe-Nipomo Dune complex that are outside of the Preserve, but considered protected (i.e., the Oso Flaco Lake Natural Area, Dune Lakes, public Point Sal properties, and the Tosco Buffer Area). (See Chapter II.)

The Management Program is also an inclusive reference about the resources of the Guadalupe-Nipomo Dunes Preserve, particularly its ecological resources. Such resources include several plant communities, such as central coast dune scrub, central coast sage scrub, arroyo willow riparian forest, and other wetland communities. In addition, the Preserve contains at least twenty-one species of endangered, threatened, or other sensitive plants including La Graciosa thistle (*Cirsium loncholepis*) and beach spectacle pod (*Dithyrea maritima*). Multiple special-status animals also reside in and around the Preserve, including the California least tern and western snowy plover. (See Chapter III.)

Significantly, this Management Program sets forth a lasting, workable structure for the overall management and protection of the Guadalupe-Nipomo Dunes Preserve. This structure is intended for owners of Preserve lands, as well as interested landowners outside the Preserve (and within the Guadalupe-Nipomo Dunes vicinity), and the community at large -- so that all can work together to sustain the long-term viability of the dunes ecosystem and its appropriate enjoyment by people. Such guidance takes the form of four programs: the Dunes Forum, the Dunes Council, the Scientific/Technical Advisory Committee, and the Program Manager for the Dunes Center. (See Chapter IV.)

The first program is a continuation of the Guadalupe-Nipomo Dunes Forum. The "Dunes Forum" provides an open venue for all organizations, entities, and individuals to meet bimonthly and discuss any issue related to the dunes and surrounding communities. The Dunes Forum has been in place for nearly two years and has successfully brought together people of different perspectives for common discussion.

The second program is a standing committee of individuals and entities who own and/or manage lands within the Guadalupe-Nipomo Dunes Preserve and other properties within the dunes complex. Called the "Dunes Council," the committee would meet as needed to discuss common issues, work cooperatively to exchange information and perhaps resources, and to coordinate grant requests that could fund dune projects.

The third program is a standing committee of experts (the "Scientific/Technical Advisory Committee") who understand the ecological resources of the dunes and can provide voluntary guidance to property owners, managers, and the community on such matters as restoration projects, grant applications, appropriate uses of the dunes, and general management.

The fourth program is the creation of a permanent position within the Dunes Center known as the Program Manager. As envisioned by this Management Program, the Program Manager will have a wide variety of tasks. Perhaps most importantly, the Program Manager will coordinate all the programs, so that the various property owners, land managers, and community members can work in concert to achieve the protection and sound management of the Guadalupe-Nipomo Dunes. Other specific tasks of the Program Manager include facilitating the Dunes Forum meetings, organizing and coordinating the Dunes Council, recruiting members and otherwise coordinating the Scientific/Technical Advisory Committee, and helping coordinate research and monitoring activities and restoration projects in furtherance of the implementation of the Management Program.

In addition, the Program Manager would be responsible for managing the Dunes Center - the focus of education, research, and interpretive activities for the Guadalupe-Nipomo Dunes.

This organizational structure will become increasingly important as ownership and management of the Preserve evolves from primarily The Nature Conservancy, to local control (particularly of the Dunes Center) and ownership/management by new entities. As described in Chapter II, these new entities may include the U.S. Fish and Wildlife Service, the Center for Natural Lands Management, and the Land Conservancy of San Luis Obispo County.

The Management Program also sets forth suggestions and, where appropriate, requirements for the management of land units comprising

the Preserve. While the requirements vary depending upon the circumstances of the individual management units, five overarching management principles are provided: (1) the Preserve should be managed in a manner that ensures that the dunes shall always be a place for people to use and enjoy, where the land stays healthy, and where wildlife flourishes; (2) the resources and human uses of the Preserve should be managed with cooperation, coordination, and communication between and amongst the property owners and managers, public agencies, organizations, and the community; (3) the Preserve will be managed in a manner that maintains the contiguous dunes ecosystem from Point Sal to Pismo State Beach; (4) the scientific study and knowledge of the dunes ecosystem should be encouraged and advanced, with particular emphasis on the management and control of non-native invasive plant species; and (5) community outreach and education programs regarding the Guadalupe-Nipomo Dunes should be advanced and supported so that generations to come will understand and appreciate the value of this great dune system.

The Management Program provides both general recommendations for the management of the Preserve and specific recommendations for the management of the Mobil Coastal Preserve, the Rancho Guadalupe Dunes County Park, and the Black Lake area (the properties currently owned and/or managed by The Nature Conservancy). Specific recommendations for management of these units include the following:

- Preparing detailed ecological management plans for each management unit;
- Monitoring annually snowy plovers and least terns on the coastal units;
- Limiting human uses to passive recreational activities, unless otherwise specifically provided and consistent with protection of the resource;
- Providing the public regular docent-led hikes and other interpretive activities/structures; and
- Limiting access to daylight hours to minimize disturbance to ecological and cultural resources.

An extensive list of site-specific and general recommendations for management of the Preserves natural and cultural resources is provided in Chapter V.

The Management Program concludes with a discussion of the future of the Preserve - and how its boundaries might expand. This expansion might occur as it has in the past - through the acquisition of lands from willing sellers. It may also occur, however, with agreement by private landowners to manage their lands according to the general principles described in this document. Criteria for setting priorities for expansion of the Preserve is provided in Table 7; highest priority projects will encompass lands that contain, for example, highly sensitive resources,

great public support, solid funding for management, and high education/recreation potential. (See Chapter VI.)

Regardless of the ultimate composition of the Preserve, however, this Management Program is aimed at ensuring that all people feel welcome and have the forum to participate in the discussions, activities, and plans that affect, define, and ultimately protect the Guadalupe-Nipomo Dunes.

Kara Woodruff Smith
Project Director

This Management Program is dedicated to Kathleen Goddard Jones -- dreamer, inspirer, protector.

With special thanks to:

Carol Arnold, Jack Beigle, Ray Belknap,
John Chesnut, Chris Wm Clark, Bill Denneen,
Karyn Gear, and Dave Moran

I. Introduction

A. The Guadalupe-Nipomo Dunes

The Guadalupe-Nipomo Dunes are located in San Luis Obispo and Santa Barbara Counties along an eighteen mile stretch of coastline in central California. The dunes stretch from Point Sal in the south to Pismo Beach in the north.



The Guadalupe-Nipomo Dunes complex is actually a collection of three adjacent dune areas. From north to south, these areas are:

- The *Callender dunes*, which reside on the Nipomo Mesa and on the alluvial strip bounding the shore;
- The *Guadalupe dunes,* located on the Santa Maria River flood plain north of the river (on which the Guadalupe oil field and Mobil Coastal Preserve lie); and
- The *Mussel Rock dunes,* which are partly on the flood plain south of the Santa Maria River and partly on the high terrace extending southward to Point Sal and the adjoining mountain slope (see Figure 1).

In a 1980s inventory of sensitive resources within California, the US Fish and Wildlife Service described the Guadalupe-Nipomo Dunes as "*...the most unique and fragile ecosystem in the State...*" and ranked it first on a list of 49 habitat areas in need of protection statewide. At the same time, the U.S. Secretary of the Interior designated the Guadalupe-Nipomo Dunes as a National Natural Landmark for containing the largest, relatively undisturbed coastal dune tract in California, "where dune succession is exceptionally well displayed and the flora exhibits one

of the highest rates of endemism of any dunes in western North America". (Bayless, 1998). The California Department of Parks and Recreation has likewise stated that the Guadalupe-Nipomo Dunes are *"...the most urgently needed landscape preservation project in the State of California."*

Although human encroachment into the dunes is evident (including off-highway vehicle use and a significant release of diluent at the Guadalupe oil field), the Guadalupe-Nipomo Dunes remain one of the last, largely undisturbed dune ecosystems along the U.S. west coast. Often the victim of competing interests, undisturbed coastal dunes are becoming more and more rare in California. In spite of these pressures, the Guadalupe-Nipomo Dunes continue to support a rich diversity of plant and animal species, many of which are found only in this area. The richness of these resources is a testament to the size and relative remoteness of the dunes, and its location where northern and southern plant and animal species intermingle at the limits of their ranges. These unique qualities have combined to create one of the great natural wonders of California.

B. The Guadalupe-Nipomo Dunes Preserve

Preserve: Properties within the Guadalupe-Nipomo Dunes Preserve as shown on Figure 1.

Dunes: The entire dunes ecosystem, including properties within and surrounding the Preserve.

Within the Guadalupe-Nipomo Dunes is a collection of properties or management units that have been set aside for protection of their natural resources as well as for certain human activities (including passive recreation and scientific study). These properties are known as the Guadalupe-Nipomo Dunes Preserve and include the following properties:

- The Mobil Coastal Preserve;
- The Rancho Guadalupe Dunes County Park;
- Black Lake; and
- The Pismo Dunes Natural Preserve.

A description of these properties, along with their ecological resources and permitted recreational activities, is provided in Chapter II of this Management Program. (See also Figure 1.)

Most of the properties comprising the Guadalupe-Nipomo Dunes Preserve are currently, or were historically, managed by The Nature Conservancy ("TNC"), a non-profit conservation organization. However, today -- and even more so in the future -- ownership and management is and will be provided by multiple entities, including the California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation Division ("State Parks OHV Division"); the California Department of Parks and Recreation (non-OHV Division); the County of Santa Barbara; the U.S. Fish and Wildlife Service; the Center for Natural Lands Management; and the Land Conservancy of San Luis Obispo County..

C. History of the Preserve

Establishment of the Guadalupe-Nipomo Dunes Preserve began in the late 1980s. The Preserve was initiated in large part due to efforts by the California State Coastal Conservancy (a State agency) and TNC, using Proposition 70 funds approved by the California voters in 1988. These efforts began with the acquisition of the Rancho Guadalupe Dunes County Park in the late 1980s. Today, the property is owned by the County of Santa Barbara and managed by The Nature Conservancy.

In 1982, 800 acres of the Oceano Dunes State Vehicular Recreation Area were closed to vehicular use. This area, known as the Oso Flaco Lake Natural Area, was managed for five years beginning in 1990 by The Nature Conservancy for the California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation Division ("State Parks OHV Division). Today, the area is owned and managed by the State Parks OHV Division. Although the Oso Flaco Lake Natural Area is not considered part of the Guadalupe-Nipomo Dunes Preserve, it is managed for the protection of its ecological resources and passive recreational use.

The Guadalupe-Nipomo Dunes Preserve was expanded in 1990 with the acquisition of the Mobil Coastal Preserve by the State Coastal Conservancy; it is now owned by The Nature Conservancy.

By 1991, the coordinated management of the Rancho Guadalupe Dunes County Park, the Oso Flaco Lake Natural Area, and the Mobil Coastal Preserve was underway by The Nature Conservancy, and a Management Plan was prepared to help guide these efforts. This 1991 Plan described the important resources within the properties that make up the Preserve, as well as other properties that are within the Guadalupe-Nipomo Dunes ecosystem but outside the Preserve.

Notable achievements since the adoption of the 1991 Plan include acquisition of land interests from Dune Lakes Ltd. in 1996. The southern-most portion of the Dune Lakes Ltd. property -- Black Lake -- was transferred to The Nature Conservancy and then added to the Guadalupe-Nipomo Dunes Preserve. Other property interests acquired from Dune Lakes Ltd. at the same time are described in Chapter II of this Management Program.

Other notable achievements since the adoption of the 1991 Management Plan include the extensive compilation of resource inventories for the Mobil Coastal Preserve by noted botanist John Chesnut; the extensive preparation of a geographic information system (GIS) for the entire dunes complex to help compile and analyze resource information about the dunes ecosystem; the construction of an environmentally sensitive and user-friendly boardwalk and footbridge at

Oso Flaco Lake Natural Area; the adoption by the Santa Barbara County Board of Supervisors and Park Commission of a Preliminary Master Plan for the Rancho Guadalupe Dunes County Park; the restoration/revegetation of dunes within the Oso Flaco Lake Natural Area; the establishment of a dunes visitor center in the City of Guadalupe; and the recent addition of the Pismo Dunes Natural Preserve to the Guadalupe-Nipomo Dunes Preserve.

In addition to these achievements, another significant change since the adoption of the 1991 Plan has occurred. Namely, consistent with its state-wide program, The Nature Conservancy has decided to transition out of its management and ownership responsibilities within the Guadalupe-Nipomo Dunes Preserve. This decision is a result of serious contemplation and planning by TNC. Briefly stated, the purpose of the transition is to assign its land and other interests to organizations with equal or greater capacity to manage their significant ecological resources and human activities. In turn, the transition broadens the conservation constituency and frees up finite Nature Conservancy resources – staff, expertise, and funds – for new projects. In this way, TNC can safeguard more of California's vulnerable natural heritage.

The Nature Conservancy's transition plans may have a significant effect on the management of the Guadalupe-Nipomo Dunes Preserve. Where historically the management of the entire Preserve was the responsibility of TNC, management has become increasingly shared amongst a diverse group of non-profit, county, and state entities. This diversity of management and ownership will increase as TNC completes its transition program. The final transition plan must first be approved by the Coastal Conservancy, the state funding entity responsible for many of the Guadalupe-Nipomo Dunes Preserve acquisitions.

As a result of these achievements and changes, the California State Coastal Conservancy and The Nature Conservancy concluded that the 1991 Management Plan should be updated.

D. Purpose of the Management Program

This Management Program updates and replaces the 1991 Management Plan. The primary purpose of this Management Program is to provide the public with updated information about the Guadalupe-Nipomo Dunes Preserve, including its ecological resources, permitted human uses, and present ownership and management arrangements. Further, this Management Program is to provide *general* guidance on how the Preserve



The Preserve is intended to enrich the lives of present and future generations.

should be managed into the future, to sustain its unique and magnificent ecological resources for ourselves, our children, and our childrens' children.

Finally, another purpose of this Management Program is to provide for the sound transition of The Nature Conservancy's management and ownership responsibilities, to ensure the continued protection of the Preserve's sensitive resources. Namely, the Program sets forth a framework under which the multiple and diverse land managers and owners (both within and outside of the Preserve) can coordinate their activities, and perhaps share resources, to augment and facilitate the integrated management of the Preserve as a whole.

Note that this document is called a Management *Program*, rather than a Management *Plan* because it establishes the organizational framework for management of the Preserve and recommends a series of actions that will be implemented over time (a program) to achieve the overall objective of preservation of the dunes ecosystem. It does not recommend specific, detailed habitat management techniques for individual management units of the Preserve, but instead recommends that detailed habitat management plans be prepared by the particular owners and managers of the various land units, to address the unique circumstances and issues that pertain to each specific unit. These individual management plans should be coordinated with each other so that the dune system can be managed as an ecological whole. Funding for the development of these plans by private and governmental sources is encouraged.

E. Organization of the Management Program

Chapter II of this Management Program describes the history, ecological resources, public accessibility, recreational uses, and potential future management/ownership of the individual units that comprise the Guadalupe-Nipomo Dunes Preserve. Chapter II also sets forth the principles under which The Nature Conservancy will transition its management or ownership responsibilities. Chapter III describes the ecological and cultural resources within the Preserve and the surrounding dunes.

Chapter IV sets forth a recommended framework for the overall management of the Preserve to coordinate the activities of the managing and owning entities -- both amongst themselves and with land owners outside of the Preserve -- through the establishment of a Dunes Council. It also discusses more recent efforts of community outreach to foster communication and education.

Chapter V discusses generally how the natural and cultural resources of the Preserve are currently managed for the protection of the ecosystem and for recreational use, and recommends management policies to guide these efforts in the future. Finally, Chapter VI discusses the future

of the Preserve and criteria under which expansion of the Preserve should be considered.

The policies discussed in this Program represent the general consensus of the property owners and managers of the Guadalupe-Nipomo Dunes Preserve. However, the Management Program is not intended to subordinate the authority of individual property owners and governmental agencies, but recognizes that achieving the objectives described herein will depend upon the cooperative efforts of the property owners and the public.

F. Approval Process and Legal Status of the Management Program

The Management Program is considered a "project" for purposes of complying with the California Environmental Quality Act (CEQA). For this reason, an initial study and Negative Declaration have been prepared which conclude that adoption of the Management Program will not result in a significant adverse impact on the environment. Indeed, it is hoped and anticipated that implementation of the policies and programs contained in this Management Program will result in beneficial impacts to the environment through the coordinated preservation and management of the resources that make up the Guadalupe-Nipomo Dunes.

It is expected that the owners/managers of properties within the Preserve will adopt and implement this Management Program in accordance with the provisions of applicable laws, rules, regulations and standards governing such actions for each property owner. The extent to which such proceedings may vest the Management Program with the force of law will be left up to the individual property owners/managers.

II. Management Units of the Guadalupe-Nipomo Dunes Preserve

A. Background

As noted in Chapter I, the Guadalupe-Nipomo Dunes Preserve is comprised of four separate management units: the Mobil Coastal Preserve; the Rancho Guadalupe Dunes County Park; Black Lake; and the Pismo Dunes Natural Preserve. This Chapter will generally describe these units, including their ecological resources, public accessibility, and recreational uses. Detailed descriptions of the flora, fauna, and cultural resources of the Preserve as a whole, however, are provided in Chapter III.

Each discussion of the management units also includes a description of the current and future management and ownership structure. Although the management and ownership of the Pismo Dunes Natural Preserve is not expected to change, the properties currently owned or managed by The Nature Conservancy (i.e., the Mobil Coastal Preserve, the Rancho Guadalupe Dunes County Park, and Black Lake) will be transferred, as TNC carries out its transition program.

B. Transition Program of The Nature Conservancy

The Nature Conservancy's transition of management and ownership responsibilities have occurred, and will continue to occur, gradually over time. It began with the return of TNC's management responsibilities of the Oso Flaco Lake Natural Area to the State Parks OHV Division in 1996. TNC transferred its management of public access to Black Lake to the Land Conservancy of San Luis Obispo County in 1997, and transferred its management and ownership of the Dunes Center to the same entity in July, 1998. The transition will continue with The Nature Conservancy's transfer of interests in Black Lake, the adjacent Dune Lakes property, the Mobil Coastal Preserve, and finally, the Rancho Guadalupe Dunes County Park, as described below.

The Nature Conservancy will transfer its property interests and management responsibilities in the Preserve according to the following principles:

- The Nature Conservancy will deliver each property under its ownership or control only to entities with sufficient resources, expertise, and capacity to manage the protection of ecological resources and public use. Such organizations may include the US Fish and Wildlife Service, the Land Conservancy of San Luis Obispo County, the Center for Natural Lands Management, the California

Department of Parks and Recreation, and the County of Santa Barbara.

- The Nature Conservancy will transfer property under its ownership and/or management to entities that endorse by resolution the area-wide goals of this Management Program for the Guadalupe-Nipomo Dunes Preserve, support the mission of the dunes visitor center (described in Chapter III), and participate on the Dunes Council (also described in Chapter III).

- The Nature Conservancy will transfer property under its ownership and/or management with the authorization or approval of directly effected entities, including the County of Santa Barbara and the California State Coastal Conservancy.

C. Description of Properties within the Preserve

The management units that comprise the Preserve are listed and described below; the present owner of each unit is indicated in parentheses. See Figure 1.

1. Mobil Coastal Preserve (The Nature Conservancy)

The 2550-acre Mobil Coastal Preserve ("MCP") was purchased in 1990 by the California State Coastal Conservancy from the Mobil Foundation, then subsequently transferred to The Nature Conservancy. The California State Coastal Conservancy, however, holds a conservation easement on the property, which restricts development in perpetuity and prohibits certain other activities from occurring there.



Dunes of the Mobil Coastal Preserve

The MCP is composed of a diverse complex of beach and coastal dunes. The dune complex on the MCP consists of a narrow beach, the foredunes, and the backdunes. In some places the foredune vegetation community extends well inland and includes a variety of native species. The backdunes consist of a series of hills, ridges and valleys that are largely stabilized by vegetation. However, there are areas of unstabilized parabolic dunes in the eastern (backdune) portions of the MCP. Habitats unique to the MCP include: dune hollows; vegetated peaks such as Oso Flaco Peak and Guadalupe

Peak; and steep-sided valleys containing giant coreopsis (*Coreopsis gigantea*).

The MCP is home to an abundance of plant and animal life, many species of which are rare, threatened, endangered, or have other special protection status. Among the plants found at the MCP are La Graciosa thistle (*Cirsium loncholepis*), sand verbena (*Abronia maritima*), and crispy dune mint (*Monardella crispa*). Animals on the MCP include the western snowy plover, the Morro Bay blue butterfly, and the mountain lion. The federally endangered American peregrine falcon has been spotted foraging within the MCP.

Access to the MCP is by foot only from the Oso Flaco Lake Natural Area and along the beach from the parking area located within the Rancho Guadalupe Dunes County Park.

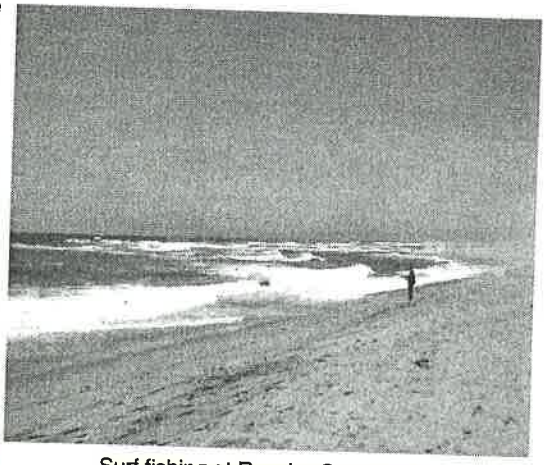
Public uses on the MCP property are limited to passive recreational activities, such as birdwatching, picnicking, fishing, jogging and hiking. The MCP is a destination point for hikes led by docents trained in the natural history of the area. Public use and facilities are limited in the MCP in order to preserve and protect the uniqueness of the area.

The Nature Conservancy is now considering the transition of management and ownership responsibilities of the Mobil Coastal Preserve to another entity with the knowledge and resources necessary for the long-term management of the property's sensitive resources, consistent with the transition principles described above. The entity best suited to assume the MCP appears to be the U.S. Fish and Wildlife Service (USFWS), which would bring MCP into the National Wildlife Refuge System (NWRS). As described by the USFWS, the NWRS is a "...system of lands managed by the USFWS that work through cooperative efforts with other federal, State and private organizations and individuals to ensure the long-term protection of species and their habitats for the enjoyment of future generations of American people." The Nature Conservancy has initiated the process of transferring the MCP to the USFWS, which will ultimately require public review and comment in accordance with the National Environmental Policy Act (NEPA). Final transition of the property is expected to occur within the next two years.

2. Rancho Guadalupe Dunes County Park (County of Santa Barbara)

Rancho Guadalupe Dunes County Park consists of 592 acres located immediately south of the Santa Maria River. The Park was established in 1987 and is now owned by Santa Barbara County and managed by The Nature Conservancy. The Park was initially acquired by The Nature Conservancy with funds from the California State Coastal Conservancy.

The Rancho Guadalupe Dunes County Park (the "Park") contains beaches and active coastal dunes adjacent to the riparian corridor formed by the Santa Maria River. The Park is currently a nesting area for the endangered California least tern and the threatened western snowy plover. Signs have been erected just inland from the beach to warn visitors to stay away from these areas during the nesting season, which extends from March through September.



Surf fishing at Rancho Guadalupe Dunes County Park

Although a thorough inventory of plants has not been conducted within the Rancho Guadalupe Dunes County Park, a number of rare plants are known to occur there, including La Graciosa thistle (*Cirsium loncholepis*), surf thistle (*Cirsium rhothophilum*) and beach spectacle pod (*Dithyrea maritima*). Future studies will help identify the location and extent of these and other sensitive species.

Access to the Park is through the West Main Street entrance west of the City of Guadalupe (one of the primary entrance points to the Preserve). An entrance station attendant (a paid employee of The Nature Conservancy) directs visitors to the parking lot located on the beach some two miles distant and informs visitors of the dune ecosystem and applicable regulations. No fees are charged; however, a $3.00 donation is suggested. The Park is open year around, although access is limited to the daylight hours.

Historically, the Park area was used for both active and passive forms of recreation. Off-highway vehicle use was popular until such use was prohibited by County ordinance in 1983. Current uses of the Park include fishing, surfing, bird watching, hiking and picnicking.

Equestrian use of the Park is currently prohibited. However, an equestrian program described in this Management Program would allow limited equestrian use subject to certain restrictions and the successful completion of a trial program (see Management of Public Access and Recreation, Chapter V).

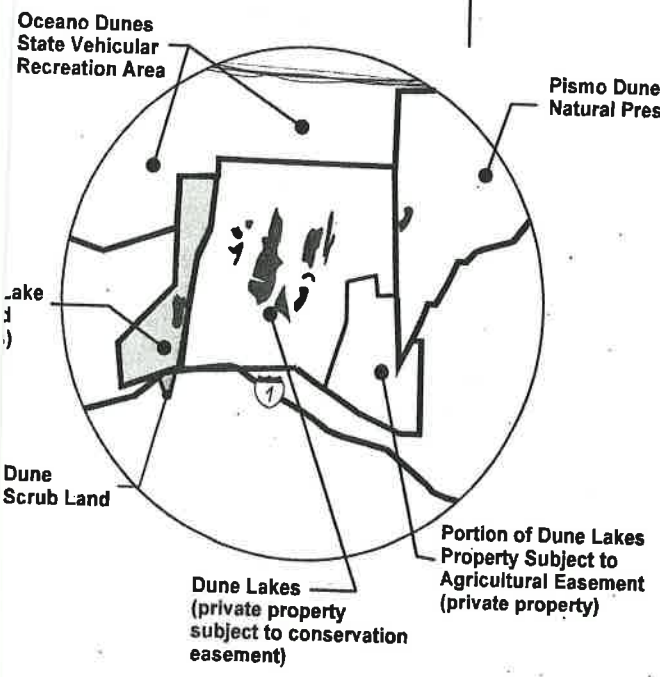
In 1997 the Santa Barbara County Parks Commission and the County of Santa Barbara Board of Supervisors preliminarily approved the *Rancho Guadalupe Dunes County Park Master Plan* which identifies a range of improvements to the Park that are intended to help educate visitors and improve the overall Park experience. The recommendations

and proposed improvements of the *Rancho Guadalupe Dunes County Park Master Plan* have been incorporated into this Management Program. Among the improvements in the Master Plan are:

- ❑ Improved restroom facilities with beach showers and fresh water;
- ❑ Improved parking facilities that will accommodate limited equestrian use (ten horse maximum) and parking for approximately 50 passenger vehicles;
- ❑ New picnic facilities;
- ❑ Improved access for persons with disabilities;
- ❑ Increased and improved signage and interpretative materials; and
- ❑ A scenic overlook

This Management Program responds to these stated desires in the Access and Recreation sub-section of Chapter V by recommending implementation of the proposed improvements to the beach parking lot and the construction of an interpretive overlook along the access road between the entrance and the beach parking lot. The parking lot is proposed to be relocated to the former Thriftway Oil site where the effects of wind-blown sand, erosion, and wave action will be minimized.

As with the MCP, the Park's management is also expected to be transferred from The Nature Conservancy. Because this property is owned by the County of Santa Barbara, however, any such transfer requires the County's express approval. Potential transition entities with the knowledge and resources necessary for the long-term management of the property's sensitive resources and human uses include the County of Santa Barbara itself, or the Center for Natural Lands Management, a non-profit organization dedicated to the protection and management of natural resources. This transition process is expected to occur within the next one to two years.



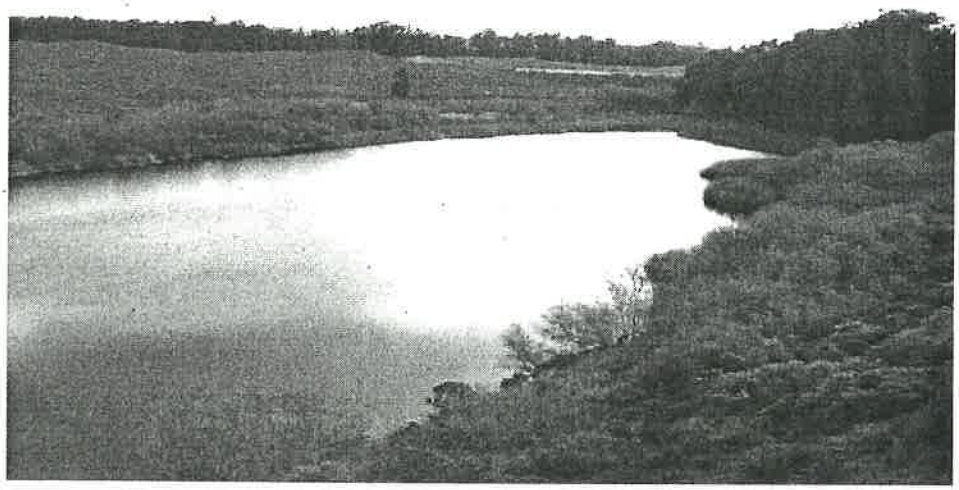
The Dune Lakes Ltd. properties

3. Black Lake (The Nature Conservancy)

The 182 acre Black Lake property was purchased in 1996 by the California State Coastal Conservancy from Dune Lakes Ltd.; it was subsequently transferred to The Nature Conservancy. The Black Lake acquisition was done in concert with the acquisition of four other land interests by the California Sate Coastal Conservancy: (1) a conservation easement on the adjacent 1,680 acre Dune Lakes area (held by The Nature Conservancy); (2) an agricultural easement on 174 acres of farm lands located north of Dune Lakes (held by the Land Conservancy of San Luis Obispo County); (3) a fee interest in 35 acres of dune scrub located east of Highway 1 in the same area (also held by the Land Conservancy); and (4) a fee interest in 385 acres

north of the Dunes Lakes area (now part of the Pismo Dunes Natural Preserve, as described below).

Black Lake is so named for the color of the water which is blackened by thick peat deposits on the lake floor. The amount of water in the lake has declined over the last twenty or more years according to observations of local individuals. It has been speculated that this decline is caused by a lowering of the regional ground water levels or the blockage of the natural drainage course from Black Lake Canyon by railroad and road construction.



Black Lake

The Black Lake property, like the rest of the properties included in the 1996 acquisition, contains coastal dune scrub, freshwater lakes and marshes, and riparian woodlands. These habitat types are among the rarest in California. The property is in relatively pristine condition, and is home to multiple plant and animal species, although a formal inventory of ecological resources has never been completed. Duckweed, pondweed, and several species of algae thrive in the nutrient-rich open waters of the lakes. The federally endangered marsh sandwort (*Arenaria paludicola*) may be present in the marsh margins of the lake.

In addition to plants, the open water and marshes of Black Lake and other dune lakes provide important migratory habitat for a wide variety of animals. Several species of migratory waterfowl and shorebirds utilize the lakes for rest and refuge; a few species of ducks, such as the ruddy duck and cinnamon teal, also nest there. The California red-legged frog and western pond turtle are lake residents.

Public access to Black Lake is managed by the Land Conservancy of San Luis Obispo County and is limited to docent-led hikes, which are offered once per month except during hunting season pursuant to an access agreement with neighboring property owners.

The Black Lake property is currently owned by The Nature Conservancy. Within the next year, however, it will transition its fee interest in the Black Lake property to the Land Conservancy of San Luis Obispo County.

4. Pismo Dunes Natural Preserve (California Department of Parks and Recreation)



Dunes of the Pismo Dunes Natural Preserve

The Pismo Dunes Natural Preserve (PDNP) consists of about 570 acres located south of Arroyo Grande Creek and east of the Oceano Dunes State Vehicle Recreation Area. The PDNP is owned and managed by the California Department of Parks and Recreation under the provisions of Section 5019.71 of the California Public Resources Code, which defines a natural preserve as an area consisting of "outstanding natural or scientific significance established within the boundaries of the State park system units." The purpose of a natural preserve is to protect such features as:

- Rare or endangered plant and animal species and their supporting ecosystems;
- Representative examples of plant or animal communities existing in California prior to the impact of civilization;
- Geologic features illustrative of geological processes, significant fossil occurrences or geological features of cultural or economic interest; or
- Topographic features illustrative of representative or unique biogeographical patterns.

An area set aside as a natural preserve must be of sufficient size to allow, where possible, the natural dynamics of ecological interaction to continue without interference, and to provide in all cases, a practicable management unit. Habitat manipulation is permitted only in those areas found by scientific analysis to require such manipulation to preserve the species or associations which constitute the basis for the establishment of the natural preserve.

The Pismo Dunes Natural Preserve consists primarily of foredunes vegetation and active dunes. It provides limited nesting areas for the threatened western snowy plover (*Charadrius alexandrius nivosus*) and other sensitive plant and animal species. The property contains Big Pocket Lake and Willow Lake (seasonally wet), which were part of 385

acres purchased from Dune Lakes Ltd., as described above. The foredunes have been significantly impacted by the non-native European beach grass (*Ammophila arenaria*), which is a persistent problem throughout the dunes complex.

Access to the PDNP is most easily gained from the north along the beach through the Oceano Dunes State Vehicular Recreation Area ("SVRA"). Off-highway vehicle use is prohibited within the Natural Preserve. Public access is limited to passive recreational activities, such as hiking and scientific study, and equestrian use. Volunteer docents for the California Department of Parks and Recreation offer informational hikes through the property.

The California Department of Parks and Recreation intends to maintain its ownership and management of the Pismo Dunes Natural Preserve.

5. Other Protected Properties

Other properties within the dunes complex, but outside the formal Guadalupe-Nipomo Dunes Preserve boundary, have also been set aside for permanent protection of the ecological resources. Many of these properties also provide for human recreational use.

A. Oso Flaco Lake Natural Area (State Parks OHV Division)

The largest of the protected properties outside of the preserve is the Oso Flaco Lake Natural Area (OFLNA). The property consists of about 800 acres located north of the Mobil Coastal Preserve and south of the Oceano Dunes Vehicular Recreation Area.

In 1982, the OFLNA was permanently closed to vehicle use. From 1991 to 1996, the property was leased to The Nature Conservancy by the Sate Parks OHV Division, during which time the boardwalk and footbridge were constructed. After the management agreement expired, the State Parks OHV Division assumed management of the park. Under its management, the State Parks OHV Division has constructed extensions to the footbridge and re-vegetated large portions of the OFLNA.

The most notable features of OFLNA are two stunning freshwater lakes, known as Oso Flaco Lake and Little Oso Flaco Lake. With over 200 bird species residing in or migrating through the area, it is a bird watchers's paradise. The dune areas are vegetated with coastal sage and dune scrub. Typical plants include dune lupine (*Lupinus chamissonis*), beach evening primrose (*Camissonia cheiranthifolia*), and coyote bush (*Baccharis pilularis*). The primary vegetation near the lakes and in some of the back dunes is dense arroyo willow (*Salix lasiolepis*), California wax myrtle (*Myrica californica*), and juncas grass (*Juncus lesueurii*).

The OFLNA is open year round during daylight hours. Access is by Oso Flaco Lake Road off Highway 1, north of Guadalupe. A $4.00 entrance fee is charged for vehicles parking in the lot at the east end of the area. The only access through OFLNA is by foot; dogs, horses, and vehicles are prohibited.



Oso Flaco Lake

B. Point Sal Area

Point Sal marks the southern end of the Guadalupe-Nipomo Dunes region. Adjacent to the point are several properties that are publically owned, protected, and may in the future–with the participation of the public owners–become part of the Guadalupe-Nipomo Dunes Preserve.

The County of Santa Barbara owns approximately 75 acres near Point Sal, and is currently in escrow for an additional 400 acres. As funding for this property has now been secured through local and state sources, the acquisition is expected to be finalized in the near future. The Federal Bureau of Land Management owns approximately 40 coastal acres just north of the point, and the California Department of Parks and Recreation owns approximately 75 acres just east of the point along the coastline. (See Figure 1.)

Notable features of the Point Sal area are the exquisite steep rocky inclines, white sandy beaches, and coastal bluffs and terraces. The area is home to multiple plant and animal species, including the signature giant coreopsis (*Coreopsis gigantea*), surf thistle (*Cirsium rhothophilium*), and coyote bush (*Baccharis pilularis*). Mountain lion tracts are occasionally found.

Access to these properties is permitted year round, although access is difficult as a result of the 1998 winter storms. Brown Road, in northern Santa Barbara County off Highway 1, provides partial access, although, until a state-maintained road is repaired, visitors must proceed on foot for several miles to reach Point Sal. Access can also be obtained by parking at the Rancho Guadalupe Dunes County Park and proceeding on foot along the coastline for about five miles.

C. Dune Lakes

Just north of Black Lake is an area known as Dune Lakes. The Dune Lakes area contains several fresh water coastal lakes, only a small number of which still exist in a natural state in California. North of the lakes is an area used for agricultural production. As noted earlier, these parcels were part of the 1996 transaction funded by the California State Coastal Conservancy and negotiated by The Nature Conservancy.

The Dune Lakes area is in private ownership and the public is not permitted to enter except by expressed permission of the owner. These parcels are considered protected as they are to remain in their existing state in perpetuity, as a result of the transfer of a conservation easement on the coastal lakes section to The Nature Conservancy and on the agricultural section to the Land Conservancy of San Luis Obispo County. Within the next year, The Nature Conservancy plans to transfer its conservation easement to The Land Conservancy.



Dune Lakes

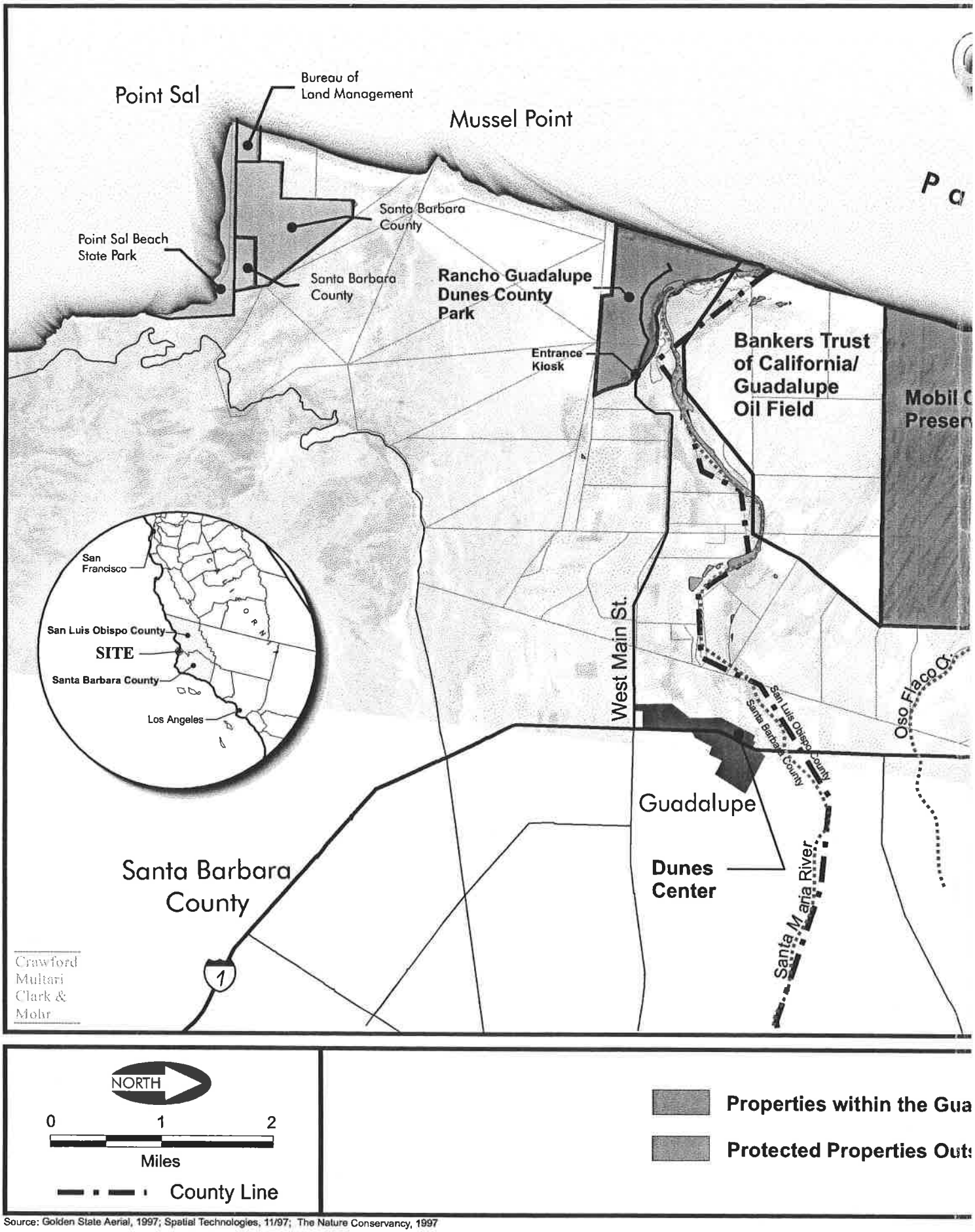
D. Tosco Property

The Tosco Refining Company owns 1,780 acres adjacent to Highway 1 on the Nipomo Mesa. The refinery which occupies a portion of this site refines oil supplied from the Central Coast and from the San Joaquin Valley. The facility has been on this site for over 40 years and currently employs about 150 people.

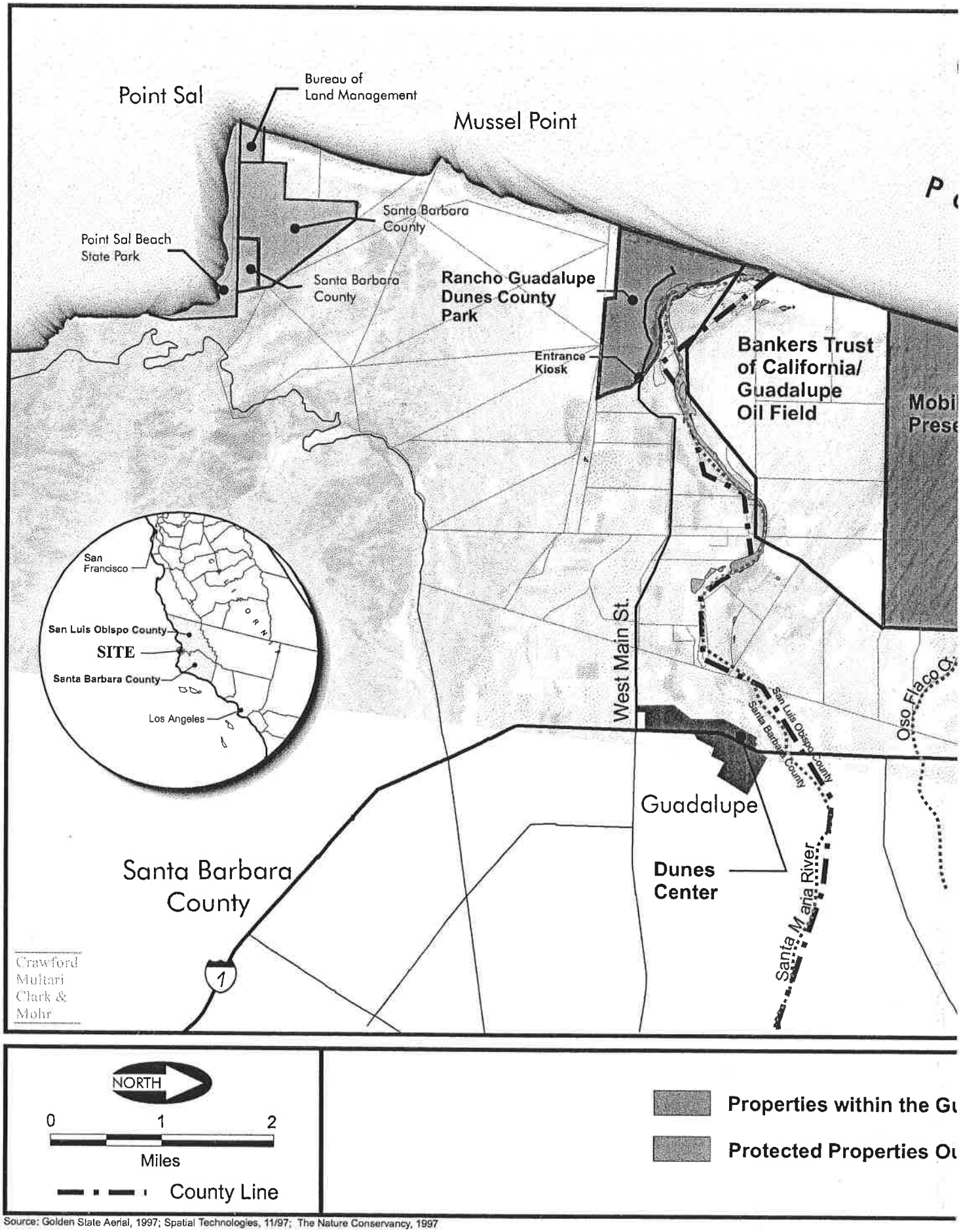
In January, 1999, Tosco and State Parks OHV Division signed an agreement to set aside 630 acres of Tosco's property in the Guadalupe-Nipomo Dunes (see Figure 1). The five-year agreement will prevent the 630 acre site from being developed, in addition to maintaining the sensitive ecosystem that exists on the property within the Guadalupe-Nipomo Dunes.

Although these properties are not currently part of the Preserve, they could be added in the future pursuant to the participation of willing land owners. Indeed, it is hoped and anticipated that the Preserve will, in the long run, be defined by all properties in the Guadalupe-Nipomo Dunes that have been set aside in perpetuity for the protection of their natural resources and the compatible use by people, and where the owners of

the properties comprising the Preserve have ascribed to the goals applicable to the entire dunes complex.



Source: Golden State Aerial, 1997; Spatial Technologies, 11/97; The Nature Conservancy, 1997



Source: Golden State Aerial, 1997; Spatial Technologies, 11/97; The Nature Conservancy, 1997

22A

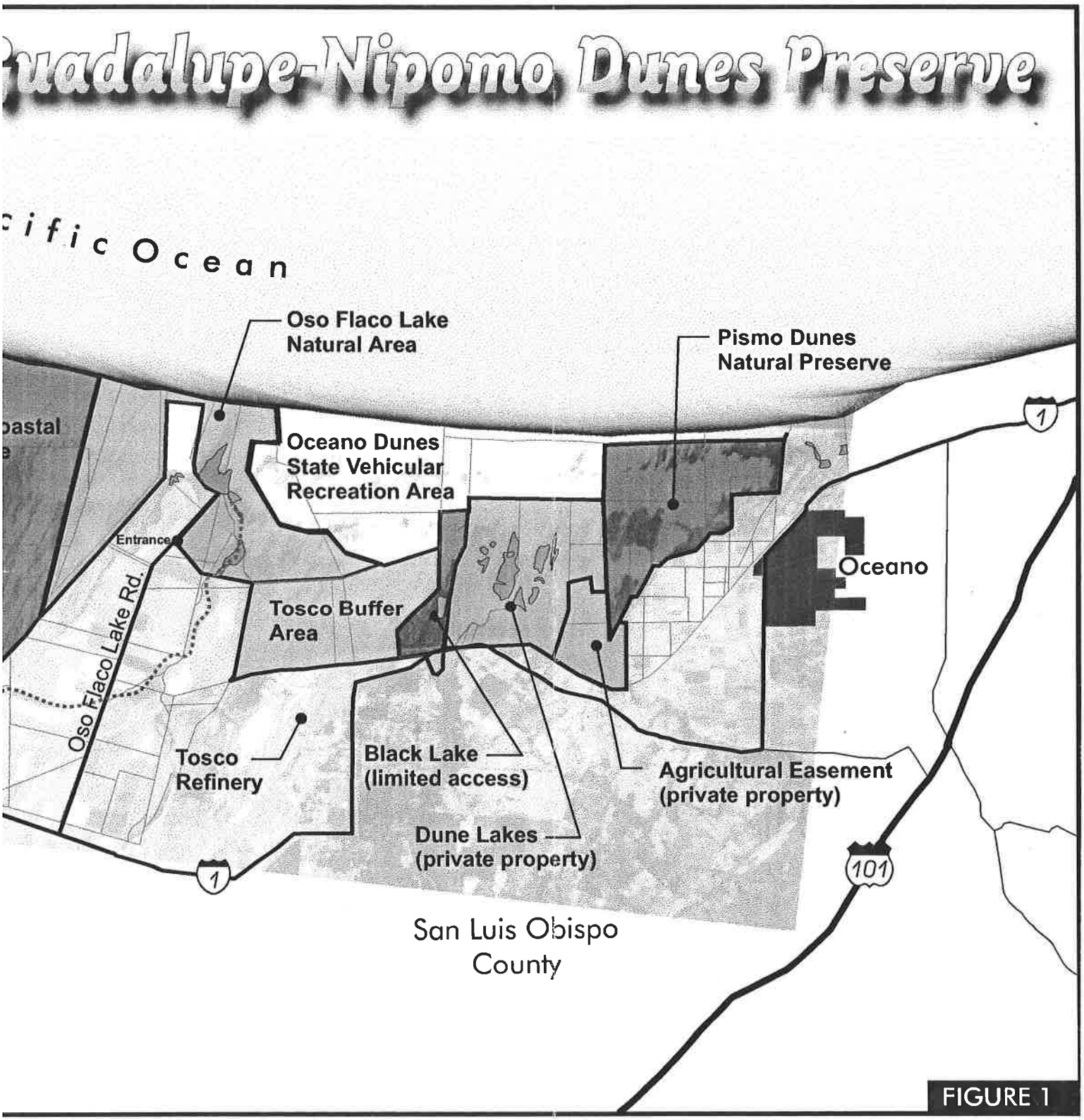


FIGURE 1

dalupe-Nipomo Dunes Preserve

ide the Guadalupe-Nipomo Dunes Preserve

The Nature Conservancy

Coastal Conservancy

III. Resources of the Guadalupe-Nipomo Dunes Preserve

A. Introduction

The goals and policies of this Management Program must be based on a thorough and accurate understanding of the diverse resources which make up the Preserve if the objectives of the Program are ever to be achieved. Thus, this Chapter of the Management Program describes the natural and human-made resources found within the Guadalupe-Nipomo Dunes Preserve to provide a context for the organizational and ecological management policies that follow.

The flora, fauna and dune morphology of the Preserve and surrounding dune areas have been the subject of numerous scientific studies over the years. Plant species have received the most attention, with both property-specific and area-wide inventories prepared using a combination of aerial photography and field surveys. Most recently, The Nature Conservancy funded an inventory of dune vegetation within the Preserve and on surrounding properties using aerial photography and limited field surveys. The resulting data have been incorporated into this Management Program.

Other studies have focused on birds; soils and geology; insects; groundwater systems; and the near-shore estuarine environment. Much of this data has been compiled on a geographic information system (GIS) for mapping and analysis purposes. A summary table of recent research projects and documents is included as Appendix F.

Although the Guadalupe-Nipomo Dunes Preserve was established primarily to provide for the protection and preservation of sensitive biological and other natural resources, the Preserve is also rich in artifacts of historical and cultural significance. Native peoples populated portions of the Preserve beginning about 10,000 years ago. The Preserve and surrounding properties were also a popular location for the motion picture industry which took advantage of the setting to film such classics as Cecil B. DeMille's *The Ten Commandments*.

B. Morphology of the Dunes

Coastal dunes occur where erosional rivers, wind and topography combine to cause sand to accumulate in a series of wind-blown low hills. The dune system as a whole is a very dynamic and varied landscape. Wetlands, dunes, and slacks are created and destroyed naturally overtime through the continual downwind migration of the active dunes. The natural balance of this cycle of creation provides the complex habitats which are the home to the unique species of plants and animals that thrive in the Guadalupe-Nipomo Dunes.

Much of the interior dune sheet was created in the last Ice Age (more than 6000 years ago) when the accompanying fall in sea level exposed enormous sand reserves to wind erosion. These older, more stabilized dunes lie generally inland from the beach and have a distinctive highly elongated parabolic shape. These dunes have been largely stabilized by the growth of low-lying vegetation that binds the sandy soil. Steep, parallel ridges have been formed alongside the downwind migration of the still active dune fronts. Behind the dunes and formed by their passage are long narrow valleys supporting the dune swale and wetland plant communities.

Recently formed and more active *foredunes* lie between the beach and the older dunes. They are formed by wind-blown sand that accumulates in a broken series of high longitudinal ridges and slacks perpendicular to the prevailing wind and parallel to the beach. Sands blown from the crests of these younger foredunes move eastward forming older, more stabilized dunes. The rate of dune expansion inland is greatly affected by the changes in the sand supply, climate, and vegetative cover in the foredunes. Highly disturbed portions of the Oceano Dunes SVRA have experienced rates of dune expansion in excess of 50 feet per year. (Hunt, 1993)

Immediately inland of the beach is a series of low hummocks that create longitudinal dunes. These narrow ridges are aligned parallel with the prevailing wind from the northwest. The narrow beach and adjacent foredune are the habitat for a suite of sensitive species, and the focus of most human recreation within the Preserve. The width of the beach varies throughout the Preserve, but is relatively narrow and steep in the long Mobil Coastal Preserve shoreline, and broader at the outlet of the Santa Maria River and Oso Flaco Creek.

A full discussion of the Guadalupe-Nipomo Dune morphology, The Origin, Maintenance and Land Use of Aeolian Sand Dunes of the Santa Maria Basin, California, has been prepared for The Nature Conservancy by Dr. Larry Hunt and is on file at the Dunes Center. (Hunt, 1993)

C. Surface Water

A number of waterways find their terminus on properties within the Preserve; the largest is the Santa Maria River which cuts through the dunes just north of the Rancho Guadalupe Dunes County Park and forms the border between Santa Barbara and San Luis Obispo Counties. The river provides fresh water that nourishes riparian plants and animals and is an important source of sand for the continuing process of dune formation. Both the Santa Maria River and Arroyo Grande creek (at the north end of the dune complex) have upstream dams, which reduce the supply of sand for nourishment of the dune system.

Oso Flaco Creek supplies surface water to form the chain of the Oso Flaco Lakes; these consist of two small fresh-water lakes and

neighboring wetlands. Oso Flaco Creek formed the historic mouth of the Santa Maria River before it was diverted by levee construction. (Hunt, 1993) Farther north still is Black Lake and the Dune Lakes area. Other significant fresh-water lakes in the area include Coreopsis, Jack, White, Big Twin, and Celery. The Nature Conservancy GIS identifies 284 acres of open fresh water in the Guadalupe-Nipomo Dunes area.

The wind is able to erode sand in the dune slacks to the depth of groundwater. This wind scour has created a scattering of tiny wetlands and water holes throughout the dune sheet.

The linkage of the dune lakes and wetlands to shallow groundwater and agricultural runoff raises significant management concerns. Lakes within the dunes have gone dry in drought years when groundwater supplies have been depleted through pumping. Riparian communities and endangered plant populations have been eliminated by the dredging of agricultural drains. Urbanization of the Nipomo Mesa has changed the hydrology of Black Lake Canyon.

D. Ecological Resources of the Preserve

1. Classification Schemes for Sensitive Plant and Animal Species

The unique location, climate, and habitats of the Guadalupe-Nipomo Dunes support a number of rare plant and animal species whose sensitivity has been classified in accordance with federal and State laws. Table 1 provides a summary of the classification schemes adopted by the federal and State governments regarding "rare and endangered" plant and animal species. The federal classification system is managed by the Department of Interior, US Fish and Wildlife Service, in accordance with the Endangered Species Act of 1973, as amended. The California Department of Fish and Game administers the State classification system in accordance with the California Endangered Species Act of 1970, as amended. Although the definitions and terminology differ somewhat between the two schemes, the goal is essentially the same: to help ensure the long-term viability and diversity of plant and animal species.

The California Native Plant Society (CNPS) is a non-profit organization whose goal is to identify and preserve the diverse native plant communities throughout the State. Classifications used by the California Native Plant Society are advisory only, and not codified in law. Significantly, however, the California Department of Fish and Game recognizes CNPS List 1A, 1B, and 2 plants as requiring review under the California Environmental Quality Act (CEQA) for projects that impact populations, and recommends the same protection be extended to List 3 and 4 plants (see Table 1, page 27).

The sensitivity of a particular plant or animal species is indicative of either low numbers throughout its range or in specific locations. Plant and animal species that are not officially designated as "rare, threatened

or endangered" may also be important because they are found in limited numbers locally, or are at the edge of their range and vulnerable to local extinction. The unusual and wonderful Giant Coreopsis (*Coreopsis gigantea*) is an example of a plant found at the limit of its range and threatened with local extinction.

Table 1
Classification Schemes for Sensitive Plant and Animal Species

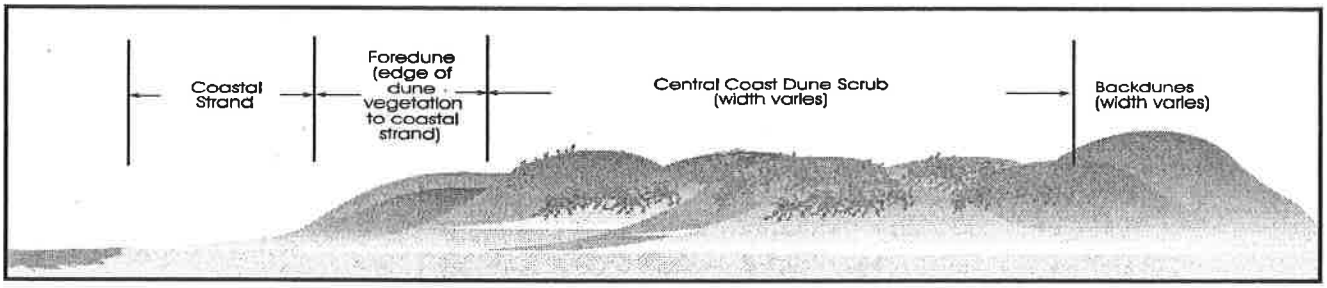
Enabling Legislation	Enforcement Agency	Classification of Species	Classification Code
Endangered Species Act, 1973	US Department of Interior	Endangered - Any species in danger of extinction throughout all or a significant portion of its range.	FE-Federally listed, Endangered
		Threatened - Any species likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.	FT-Federally listed, Threatened
		Candidate - Taxa for the which the USFWS currently has sufficient information on biological vulnerability and threats on hand to support the issuance of a rule to list, but issuance of the proposed rule has been precluded.	FC-Candidate for listing.
		Species of Concern (C1) - Former Category 1 Candidate, now considered a Species of concern. Taxa should be given consideration during planning for projects.	C1- Species of special concern.
		Species of Concern (C2) - Former Category 2 Candidate, now considered a species of Concern. Taxa should be given consideration during planning for projects.	C2- Species of special concern.
		Proposed - Taxa for which a general notice has been published in the local newspaper and a proposed rule for listing has been published in the Federal Register.	FP- Proposed for listing.
		Federal Sensitive Species -Taxa designated by the BLM or the US Forest Service as sensitive species.	FSS - Federal sensitive species.
California Endangered Species Act, 1970 California Native Plant Protection Act, 1977 California Species Preservation Act, 1980	California Department of Fish and Game	Endangered - A native species or subspecies of bird, mammal, amphibian, reptile, or plant which is in danger of becoming extinct throughout all or a significant portion of its range due to one or more causes including loss of habitat, change in habitat, over-exploitation, predation, competition or disease.	SE - State listed, Endangered
		Threatened - A native species or subspecies of bird, mammal, amphibian, reptile, or plant presently threatened with extinction is likely to become an endangered species in the foreseeable future in the absence of special protection and management efforts.	ST- State listed, Threatened
		Rare - A species, subspecies, or variety is rare when, although not presently threatened with extinction, it is in such small numbers throughout its range that it may become endangered if its present environment worsens.	SR - State listed, Rare
		Candidate - A native species or subspecies of bird, mammal, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add to the species list.	CE - Endangered candidate
		Species of Special Concern - Native species or subspecies that have become vulnerable to extinction because of declining population levels, limited ranges, or rarity. The goal is to prevent these animals from becoming endangered by addressing the issues of concern early enough to secure long term viability for these species.	SSC - California species of special concern.
None	California Native Plant Society	List 1A - Plants assumed to be extinct in California. List 1B - Plants that are rare, threatened or endangered in California and elsewhere. List 2 - Plants that are rare or endangered in California, but more common elsewhere. List 3 - Plants about which more information is needed. List 4 - Plants of limited distribution that may need monitoring	–

2. Plants of the Guadalupe Nipomo Dunes Preserve

Habitat communities found within the Guadalupe-Nipomo Dunes Preserve and surrounding dune areas are illustrated by Figure 2 and summarized below. The plant community classification has been developed by VL Holland and D. Keil in their Botanical Study of the Nipomo Dunes Preserve (Holland et al., 1995). A habitat delineation of the Guadalupe-Nipomo Dunes based on these community types was prepared by Spatial Technologies in a GIS completed for The Nature Conservancy in 1997.

A. Foredunes Communities

As described above, the active coastal dunes and foredunes that lie just inland from the coastal strand are typically low ridges and hummocks ten to thirty feet in height. The close association of these habitats with the beach means they are found in a narrow band along the Preserve's seaward edge and consequently constitute less than 5% of the land area of the Preserve.



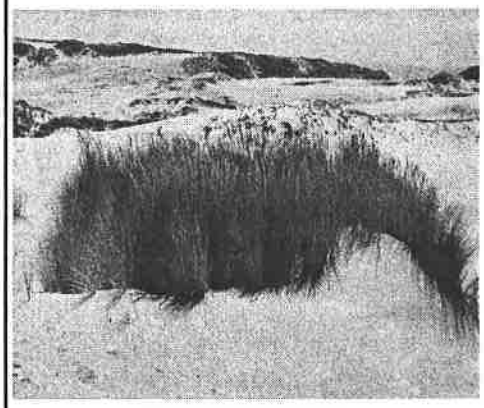
The plant communities in the zone immediately inland of the beach are characterized by low-growing, succulent, mat-forming perennial herbs with an extensive root system. Only the most salt-tolerant species are able to colonize the coastal strand. Plants found in this area are pioneers in dune stabilization. Characteristic species include beach bur (*Ambrosia chamissonis*); and beach saltbush (*Atriplex leucophylla*) as well as non-natives such as European sea rocket (*Cakile maritima*)and ice plants.

Where dune succession has resulted in well-established hummocks, a more diverse and complex foredune community develops. Additional species in the well-established foredunes include the yellow sand verbena (*Abronia latifolia*), beach evening primrose (*Camissonia cheiranthifolia*), dune strawberry (*Fragaria chiloensis*), beach cryptantha (*Cryptantha clevelandii*) and beach morning glory (*Calystegia soldanella*).

Several sensitive plants occur within this community: surf thistle (*Cirsium rhothophilum*), beach spectacle-pod (*Dithyrea maritima*), dunedelion (*Malacothrix incana*), and red sand verbena (*Abronia maritima*).

The formation of the vegetated dune hummocks is a process that requires considerable time, and may be reversed by human or environmental disturbance. Wind erosion of damaged dunes results in blowouts where sand is stripped away from roots and buried stems of the dune stabilizing plants. The destabilized dune may become active, migrating downwind, and engulfing plants growing in its path.

In addition to the native species, several seriously invasive non-native plants are found in the foredunes. European beachgrass (*Ammophila arenaria*) is a perennial grass that was introduced to California in the late 1800's and planted within the dunes by about 1910. (Hunt, 1993) European beach grass forms dense clumps that trap windblown sand, creating steep foredunes. Its robust growth and tolerance to sand make it well-adapted to the dunes environment and enable it to quickly out-compete native dune flora, reducing the overall diversity.



European beachgrass

The 1997 status report on weed/non-native plant conditions on the MCP (Chesnut, 1997) identifies more than 200 acres dominated by European beachgrass south of Oso Flaco Lake. It further identifies an exponential rate of increase from analysis of recent aerial photographs. In the past 15 years, more than 200 acres have been lost to this invader on lands within the dunes managed by the California Department of Parks and Recreation, primarily at Pismo Dunes Natural Preserve and on the Tosco buffer area (Chesnut, 1998).

The group of exotic/non-native plants commonly called iceplant are also seriously invasive pests. The most common species in the Preserve is the sea fig (*Carpobrotus chilensis*), but other similar-looking exotics in this group include freeway iceplant (*Carpobrotus edulis*), and slender-leafed iceplant (*Conicosia pugioniformis*). These species are all found within the Preserve and, as with European beachgrass, displace native vegetation (although some, including biologist Bill Denneen, report that *Carpobratus chilensis* acts like a native, thereby not displacing native vegetation. Foredunes within the Pismo Dunes Natural Preserve, for example, are being overrun by *Carpobrotus edulis*.

B. Central Coast Dune Scrub

The Guadalupe-Nipomo Dunes Preserve and surrounding dunes are one of the last remaining areas of California where a dune scrub habitat remains intact. The central coast dune scrub is found on the slopes and ridges of the more stabilized dunes inland from the foredunes zone. The Mobil Coastal Preserve is composed predominately of this community

type (more than 1300 acres), making it an especially important resource area. The plant communities of the central coast dune scrub can be considered a later successional phase that follows the pioneer plants of the active dune community.

The central coast dune scrub is dominated by perennial evergreen shrubs and subshrubs with an extensive interlocking root system that stabilizes the sand. Dune scrub communities have greater species diversity than do the foredune communities. The soils of the dune scrub communities have more organic matter, retain more water, are more fertile and have a lower salt content than the soils of the foredunes. As the plants grow, the stabilized area expands to create favorable conditions for the spread of additional plants. A thin fragile layer of mosses and lichens develops in time, and delicately binds the surface sand together. The mossy soil resists invasion by exotics, but is easily broken up by foot, animal and off highway vehicle traffic. (Holland, et al., 1995)



Central coast dune scrub in the Mobil Coastal Preserve

The most common and dominant shrubs in the dune scrub on the Preserve include:

Mock heather	*Ericameria ericoides*
Coastal buckwheat	*Eriogonum parvifolium*
California aster	*Lessingia filaginifolia*
Silver dune lupine	*Lupinus chamissonis*

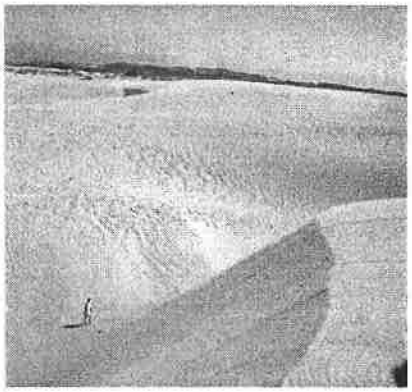
Several species associated with the dune scrub community have sensitive status. These include: localized populations of endangered Nipomo lupine (*Lupinus nipomensis*); the brilliant yellow wallflower (*Erysimum insulare* var. *suffrutescens*); the showy pale pink prickly phlox (*Leptodactylon californicum* spp. *tomentosum*); San Luis Obispo dune mint (*Monardella frutescens*); the dune almond (*Prunus fasciculata* ssp. *punctata*); and the brilliant blue dune delphinium (*Delphinium parryi* ssp. *blochmaniae*). A spectacularly showy plant of the dune scrub, the succulent-stemmed giant Coreopsis (*Coreopsis gigantea*) reaches its northernmost limit in the Oso Flaco Lake Natural Area.

Exotic species in the dune scrub community include the iceplants and European beachgrass. In addition, the exotic veldt grass (*Ehrharta calycina*) is a severe threat to the central coast dune scrub. This perennial clumping grass spreads rapidly through profuse seeding. It first invades the disturbed areas of the interior dunes (along trails and tracks, in areas

damaged by off highway vehicles and animal grazing, and in the lee of dune ridges), but later expands to fully colonize extensive acreage. The pest plant has a dense mat of surface roots that are able to outcompete virtually all other vegetation. Areas which have succumbed to invasion by the grass have very low diversity of plants and animals (USAF, 1994, Hunt, 1993). Its uncontrolled spread directly threatens the endangered Nipomo lupine with extinction (Chesnut, 1998).

Veldt grass was introduced to California from its native Cape Province of South Africa and planted widely in the 1940's in a misbegotten attempt at "range improvement." It has, since, expanded to threaten all the dune communities of the central coast and especially those at Vandenberg Air Force Base, Morro Bay/Los Osos, and the Nipomo Mesa. More than 1300 acres are identified as potentially susceptible to this pest on the Mobil Coastal Preserve alone. (Chesnut, 1997) Very little research or practical experimentation has been directed at its control (see USAF, 1994). The epidemic spread of this dangerous weed remains completely uncontained.

C. *Active Coastal Dunes*



Large, active coastal dunes

More than 4000 acres of the Guadalupe-Nipomo Dunes consists of the active coastal dune community. This is characterized by large, actively moving, unstable sand dunes that are sparsely vegetated to completely unvegetated. Much of the active dune acreage is within the Oceano Dunes SVRA, where the dunes are kept unnaturally free of vegetation by off highway vehicle use.

Plants colonizing the active dunes must be capable of withstanding the desiccating and physically damaging effects of wind-blown sand. The open migrating dunes found inland from the foredune zone are considered *Active Interior Dunes* (Holland et. al. 1995). A unique association of pioneer plants develops in this harsh habitat characterized by the silver dune lupine (*Lupinus chamissonis)*, large numbers of the crispy dune mint (*Monardella crispa*) and Blochman's leafy daisy (*Erigeron blochmaniae*). These last two species are special status plants (listed in accordance with the criteria described on Table 1), in consideration of the relative rarity of their preferred habitat. The dunes just south of the Oso Flaco Lake Natural Area provide a good example of this community.

If the coastal foredunes or coastal dune scrub communities are impacted in such a manner that the vegetation is removed, the area will revert to active moving dunes and pioneer plant communities. This is particularly important within the dunes where vegetation has been destroyed as a result of off-highway vehicle use, and wind erosion has resulted in sand "blow-outs." Newly activated dunes are overrunning sensitive wetlands and engulfing areas that were once thickly vegetated.

The Active Interior Dunes are themselves threatened by the invasion of European Beach grass (*Ammophila arenaria*) which is able to thrive and expand explosively in this unremittingly severe habitat. Once established, beach grass arrests the active dune and effectively excludes all other plants.

D. Central Coast Sage Scrub

Coastal sage scrub is found throughout Southern California. Within the Guadalupe-Nipomo Dunes, some characteristic members of this community are found along the inland slopes and interior edges of backdunes intermingled with the central coast dune scrub community. These characteristic plants include coyote brush (*Baccharis pilularis*), California sagebrush (*Artemisia californica*), deerweed (*Lotus scoparius*), occasional black sage (*Salvia mellifera*) and pygmy coast live oak (*Quercus agrifolia* var. *frutescens*). More extensive development of this community is present on slopes northeast of Pt. Sal, south of the Preserve properties. Several of the sage scrub species appear able to compete successfully with veldt grass, notably black sage.

E. Arroyo Willow Riparian Forest and Other Wetland Communities

Areas within the dunes where moisture can accumulate support the coastal dune swale and willow/wax-myrtle communities. Dense thickets of arroyo willow (*Salix lasiolepis*), California wax-myrtle (*Myrica californica*), or extensive mats of salt rush (*Juncus lesueurii*) are indicators of sheltered, low-lying pockets of moisture in the backdunes. Herbaceous perennials include the sensitive wedge-leafed horkelia (*Horkelia cuneata* ssp. *sericea*); sedge (*Carex pansa*); stinging nettle (*Urtica dioica ssp. holosericea*); the exotic weed, poison hemlock (*Conium maculatum*); and western goldenrod (*Euthamia occidentalis*).

Endangered plants associated with dune wetlands include the very rare marsh sandwort (*Arenaria paludicola*), Gambel's watercress (*Rorippa gambellii*), and La Graciosa thistle (*Cirsium loncholepis*).

Arroyo willow and cottonwood riparian communities are found along Oso Flaco Lake in the Oso Flaco Lake Natural Area, along Oso Flaco Creek and at the mouth of the Santa Maria River. There are extensive Arroyo willow thickets within the Mobil Coastal Preserve. The presence of willows indicates a constant and stable supply of surface or groundwater. These thickets serve as oases, providing shelter for plants, birds and other animals not otherwise associated with the more open, treeless scrub and dune areas.

Wetland communities are threatened with inundation from active coastal dunes. This dynamic natural succession has been accelerated from the unrestored damage caused by off highway vehicle activity. Coreopsis Lake and the north west shore of Oso Flaco Lake are severely threatened; here moving dunes are rapidly spilling into the lakes recent

restoration/regeneration efforts by the State Parks OHV Division have improved the situation, however. Oso Flaco Lake and nearby wetland areas cannot migrate eastward because they are adjacent to agricultural land. Several extensive revegetation schemes undertaken near Oso Flaco Lake by the State Parks OHV Division demonstrate the practical possibility of arresting active dune movement where it threatens critical natural features.

The TNC-commissioned GIS reports the following acreage for wetland communities within the broader dune complex:

Table 2
Summary of Acreage By Habitat Type
Guadalupe-Nipomo Dunes

Habitat Type[1]	Acreage	Approximate Number of Occurrences
Coastal dune swale	512	147
Floodplain	634	16
Estuary	137	1
Freshwater Marsh	161	22
Freshwater Seep	3	3
Open Water	284	32
Riparian woodland	703	69
Swamp	58	7
Total Wetland Types	2,492	

Notes:
1. For community definitions consult Holland, et al. 1995

Troublesome exotic weeds have entered the Oso Flaco Lake Natural Area. These include Cape Ivy (*Senecio mikanoides*) and Hoary Cress (*Cardaria draba*). The spread of these serious invaders has been controlled chemically by the State Parks OHV Division.

Another exotic species, pampas grass (*Cortaderia jubata*) has been nearly eradicated from wetlands in Oso Flaco Lake Natural Area and other parts of the Preserve. Volunteer efforts led by the local chapter of the California Native Plant Society, most notably Jack Beigle, have successfully eliminated more than 2000 massive clumps, without the use of herbicides.

3. Sensitive Plant Species

At least 21 sensitive species of plants are known to occur on the Guadalupe-Nipomo Dunes Preserve and surrounding dunes. The vast urbanization engulfing southern California means that the Preserve represents the most pristine and protected remnant of the former range of even relatively common species, and the very last and final refuge for

rare ones. The position of the dunes near the physiographic boundary of Southern California (Pt. Conception) means that many taxa are near their southern and northern limits of distribution on the Preserve.

Within the Preserve and surrounding dunes, many populations of sensitive species have been lost. Extirpation has resulted from many causes: plants suffered severely from off highway vehicle damage and dune erosion; weedy exotics have overrun other areas; natural succession has eliminated some habitats; plants have even suffered inadvertent destruction in the midst of restoration activity. (Chesnut, 1998)

An inventory of plant species within the Guadalupe-Nipomo Dunes Preserve was completed in 1995 (VL Holland, et al., 1995) and identified the presence of 21 taxa of rare, threatened, endangered, or otherwise sensitive native plants. Further fieldwork was conducted by JW Chesnut in 1997 and 1998 on the MCP, OFLNA and western portions of the Tosco Buffer Area. In preparation for cleanup of the diluent contamination on the Unocal Guadalupe oil field, an extensive characterization of the dunes located there has been completed (AD Little, Inc., 1997). The California Natural Diversity Database (CNDDB) maintains records on the occurrence of some (but not all) of the special status plants and animals found in the preserve. The recent expansion of the Preserve to include the unsurveyed Black Lake parcel suggest that additions to the list of sensitive species should be considered, for example, the remarkable and declining occurrence of yellow pond lily (*Nymphaea polysepala*) at Black Lake.

Table 3 provides a summary of the sensitive plant species found within the Guadalupe-Nipomo Dunes Preserve. The table provides the name of the plant species, the community type with which it is normally associated, indications of its local and regional occurrence, and its status with respect to federal, State and CNPS classifications.

Table 3

Sensitive Plant Species of the Guadalupe-Nipomo Dunes[1]

Species	Common Name	Distribution	Federal Status1	State Status1	CNPS Status1
Abronia maritima	Red sand verbena	Foredunes, pioneer hummocks on the coastal strand (Baja to San Luis Obispo Co.).	None	None	List 4
Arenaria paludicola	Marsh sandwort	Emergent marsh. Oso Flaco Lake and Black Lake Canyon, Jack Lake (extirpated?).	E	E	List 1B
Cirsium loncholepis	La Graciosa thistle	Coastal wetlands. Large population at Santa Maria River mouth, Dune Lakes, scattered in dune wetlands, extirpated from Oso Flaco	FC	T	List 1B
Cirsium rhothophilum	Surf thistle	Ocean bluffs and ocean-facing foredunes. MCP and Unocal to Point Arguello, extirpated from Oceano.	FC	T	List 1B
Coreopsis gigantea	Giant coreopsis	Dunes and rocky sites. Coreopsis Hill near Oso Flaco Lake, south to Los Angeles Co. and Channel Islands.	None	None	None
Dithyrea maritima	Beach spectacle pod	Foredunes and dune slacks in active sand dunes nearest coast Morro Bay to Baja, including the Channel Islands, extirpated from Oceano.	C1	T	List 1B
Delphinium parryi var. blochmaniae	dune larkspur	Central Coast dune scrub in scattered concentrations. Frequent on Tosco buffer (Nipomo to Ventura).	SSC	SC	List 1B
Erigeron blochmaniae	Blochman's leafy daisy	Coastal dunes, especially pioneer communities at margins of active interior dunes Los Osos to northern Santa Barbara Co..	None	CEQA	List 1B
Erysimum insulare var. suffrutescens	Suffrutescent wallflower	Coastal sand dunes and coastal scrub community. Morro Bay to Los Angeles.	None	None	List 4
Horkelia cuneata ssp. sericea	Wedge-leafed horkelia	Coastal dune scrub and coastal dune swale, dominant in dune swales on the MCP Extirpated in northern California.	None	CEQA	List 1B
Juncus acutus var. leopoldii	Southwestern spiny rush	Fringes of salt marsh and moist hollows bordering coastal sand dunes, Santa Maria River mouth.	None	None	List 4
Leptodactylon californicum ssp. tomentosum	Prickly phlox	Slopes in the coastal dune scrub. Type specimen from near Oso Flaco Lake. Santa Barbara and SLO county endemic.	None	None	List 4
Lupinus nipomensis	Nipomo lupine	Local endemic in sandy openings in dune scrub, Tosco Oil refinery and at Black Lake (extirpated).	FC	E	List 1B
Malacothrix incana	Dunedelion	Foredunes, Ventura to San Luis Obispo, Co.	None	None	List 4

Species	Common Name	Distribution	Federal Status1	State Status1	CNPS Status1
Monardella crispa	Crisp monardella	Foredunes and areas of open sand in the backdunes, especially on margins of parabolic dunes, endemic to central coast.	SSC	CEQA	List 1B
Monardella frutescens	San Luis Obispo monardella	Well stabilized coastal sand dune scrub communities, endemic to central coast.	SSC	None	List 1B
Mucronea californica	California spineflower	Coastal dune scrub and fringe of unstabilized dunes, disturbed areas and old trails. Monterey to San Diego.	None	None	List 4
Orobanche parishii ssp. brachyloba	Short lobed broomrape	Foredunes, collected from dunes near Oso Flaco, not recently observed. Baja to San Luis Obispo, Co.	SSC	?	List 1B
Prunus fasciculata ssp. punctata	dune almond	Coastal dune scrub, especially north slopes. Tosco buffer property, Black Lake. Central coast endemic.	None	None	List 4
Ribes divaricatum var. pubiflorum	Straggly gooseberry	Riparian and dune wetland communities. OFLNA, Black Lake Canyon, MCP. Declining throughout the West coast.	None	None	None
Rorippa gambellii	Gambel's watercress	Endemic to freshwater marshes in Black Lake Canyon, Oso Flaco Lake, Little Oso Flaco Lake, and Vandenberg AFB.	E	T	List 1B

1. Refer to Table 1 for definitions.
2. Source: Holland et. al. 1995, Chesnut 1997 and 1998, CNPS Inventory (5th. ed.) ,US Fish and Wildlife Service, California Department of Fish and Game (CNDDB)
Note: the listing status of each plant species is current as of July, 1998. However, the status of several of the listed species were under review at the time of publication and may be subject to change.

Table 4

Summary of Species Ranked by Classification

Scientific Name	Common Name
Federal Endangered (2 taxa)	
Arenaria paludicola	Marsh sandwort
Rorippa gambellii	Gambel's watercress
Proposed Rule Issued for Federal Endangered and Listed as State Threatened (2 taxa)	
Lupinus nipomensis	Nipomo lupine
Cirsium loncholepis	La Graciosa thistle
State Threatened (2 taxa)	
Cirsium rhothophilum	Surf thistle
Dithyrea maritima	Beach spectacle-pod
CNPS List 1B (6 taxa)	
Delphinium parryi var. blochmaniae	Dune larkspur
Erigeron blochmaniae	Blochman's fleabane daisy
Horkelia cuneata ssp. sericea	Wedge-leafed horkelia
Monardella crispa	Crispy dune mint
Monardella frutescens	San Luis Obispo monardella
Orobanche parishii ssp. brachyloba	Short-lobed broomrape
CNPS List 4 (7 taxa)	
Abronia maritima	Red verbena
Erysimum insulare var. suffrutescens	Suffrutescent wallflower
Juncus acutus var. leopoldii	Southwestern spiny rush
Leptodactylon californicum ssp. tomentosum	Prickly phlox
Malacothrix incana	Dunedelion
Mucronea californicum	California spineflower
Prunus fasciculata var. punctata	Dune almond
Unlisted	
Coreopsis gigantea	Giant coreopsis
Ribes divaricatum var. pubiflorum	Straggly gooseberry



western fence lizard (*Sceloporus occidentalis*)

4. Animals of the Guadalupe-Nipomo Dunes Preserve

Several different types of fauna inhabit the Guadalupe-Nipomo Dunes Preserve and surrounding dune areas, including terrestrial and aquatic invertebrates and arthropods, and vertebrates such as reptiles, amphibians, fish, birds, and mammals. Several studies have been conducted to inventory dune fauna. These studies have identified resident and migratory populations, and sensitive species within the Preserve and surrounding dune areas. Intensive monitoring tracks the nesting success of the western snowy plover and California least tern.

A. *Invertebrates*

The terrestrial invertebrates found throughout the Preserve and the entire dune complex consist primarily of arthropods. A recent survey (Sheridan, 1994) identified over 400 species including common and endemic species, and species of special concern within the dunes and the surrounding areas. Endemic species include: the flightless jumping moth (*Areniscythris brachpteris*); Point Conception Jerusalem cricket (*Ammonpelamatus muwu*); Rude's longhorn beetle (*Necydalis rudei*); white sand bear scarab beetle (*Licnanthe albopilsa*); globose dune beetle (*Coelus globosus*); and the Oso Flaco patch butterfly (*Chlosyne leanirs* spp.). Two species of special concern found at the Guadalupe-Nipomo Dunes that are present within the Preserve are the Morro blue butterfly (*Icaria icarioides* ssp. *moroensis*) and the Monarch butterfly (*Danaus plexippus*) (Powell, 1978, Hall, 1990).

A comprehensive systematic research of aquatic invertebrates at the Guadalupe-Nipomo Dunes Preserve has not been conducted. However, several species are known to exist along the shoreline. Aquatic invertebrates endemic to freshwater resources such as lakes, creeks, and riparian habitat have not been identified. Shoreline aquatic invertebrates include: the Pismo clam (*Tivela stultorum*); beach hoppers (*Orchestoidea corniculata*); and sand crabs (*Emerita analoge*).

B. *Vertebrates*

Vertebrates of the Guadalupe-Nipomo Dunes Preserve and surrounding dunes include reptiles, amphibians, fish, birds, and mammals. An inventory of birds, amphibians and reptiles at Oso Flaco Lake was prepared in 1991 by R. Burton and M. Kutilek (Burton, 1991). They found animal diversity and abundance was lower than reported by K.A. Smith in 1976, and hypothesized that this was the long-term result of earlier off-highway vehicle disturbance.

The Preserve supports several common species of reptiles, and others which are rapidly declining in abundance statewide, such as the silvery legless lizard (*Aniella pulchra*), the coastal horned lizard (*Phrynosoma coronatum fontale*) and the western pond turtle (*Clemmys marmorata pallida*).

Known amphibian inhabitants of the Preserve and surrounding dunes consist primarily of frog and salamander species. Common frogs found in wetland areas of the dunes include the Pacific treefrog (*Hyla cadaverina*); the Western toad (*Bufo boreas halophilus*)); the bullfrog (*Rana catesbeiana*)(introduced species), and the red-legged frog (*Rena aurora*). The red-legged frog is listed as federal threatened species. Reconnaissance level surveys for red-legged frogs were conducted in the OFLNA in the summer of 1998. The federal candidate species, the western spadefoot toad (*Scaphiopus hammondii*) and the California tiger salamander (*Ambystoma californiense*) are reported from nearby locations, and may be found on the Preserve if a search for these species is conducted.

Water courses and lakes within the Guadalupe-Nipomo Dunes provide habitats for several fish species, many of which were introduced to the area for recreational purposes. The federally endangered tidewater goby (*Eucylogobius newberryi*) has been reported from the Santa Maria River mouth and may be present at Oso Flaco Lake. Common fish found in freshwater lakes include the three-spine stickleback (*Gasterosteus aculeatus* ssp. *williamsoni*), largemouth black bass (*Micropterus salmoides*), bluegill (*Lepomis machrochirus*), catfish (*Ictalurus punctatus*), and perch (*Morone americana*). The taxonomic status of the reported stickleback populations is unknown. San Antonio Creek at Vandenberg AFB supports occurrences of the endangered unarmored three-spine stickleback (*Gasterosteus aculeatus* ssp. *williamsoni*).

Bird species found within the Preserve fall into two major categories: resident and migratory. Two of the most significant bird species are the western snowy plover (*Charadrius alexandrinus nivosus*) and the California least tern (*Sterna albifrons browni*). The western snowy plover is listed as a species of special concern by the California Department of Fish and Game, and a threatened species by the U.S. Fish and Wildlife Service. The California least tern has state and federal endangered status. Both of these bird species require open, vegetation-free sand to establish nests and raise their young. The plover is most successful in solitary nesting on the open strand just above high tide, while the tern favors colonial sites inland of the first dune slack. The least tern is migratory, spending the summer months in portions of the Guadalupe-Nipomo Dunes Preserve and surrounding dunes and shorelines. Terns also need calm water areas, such as lakes or lagoons in order to feed. A list of bird species found within the Preserve and surrounding dune areas is provided in Appendix D.



Several factors have made the threatened bird's survival in the Preserve and surrounding dunes difficult, including natural predators such as coyotes, raccoons, gulls, shrikes and human disruption. The nesting plovers and terns in the OFLNA are the subject of intensive scrutiny and

management by State Parks OHV Division. Small predator exclusion fences are constructed surrounding active nest sites. (Tipton, 1997)

The long-term sustainability of the birds requires a suitable mix of broad open dunes for successful nesting and vegetated hummocks for fledglings and foraging. The deterius of human recreation that attracts and maintains unnatural populations of predators must be minimized.

Over 86 species of migratory waterfowl have been identified in the Guadalupe-Nipomo Preserve and surrounding dune areas. Migratory birds use the calm, freshwater lakes and the river mouth of the Santa Maria River for breeding and feeding during the winter months. Migratory birds identified during the fall and winter months include ducks, sanderlings, whimbrels, black-bellied plovers, Fosters terns, and California gulls.

Mammals within the Preserve and surrounding dunes area are fairly common to the region in general and include the mountain lion, bobcat, badger, opossum, raccoon, gray fox, coyote, and California mule deer (represented by Colombian black-tailed deer subspecies). The Preserve's deer herd is very abundant especially on the Mobil Coastal Preserve, and its impacts and management may need to be considered.

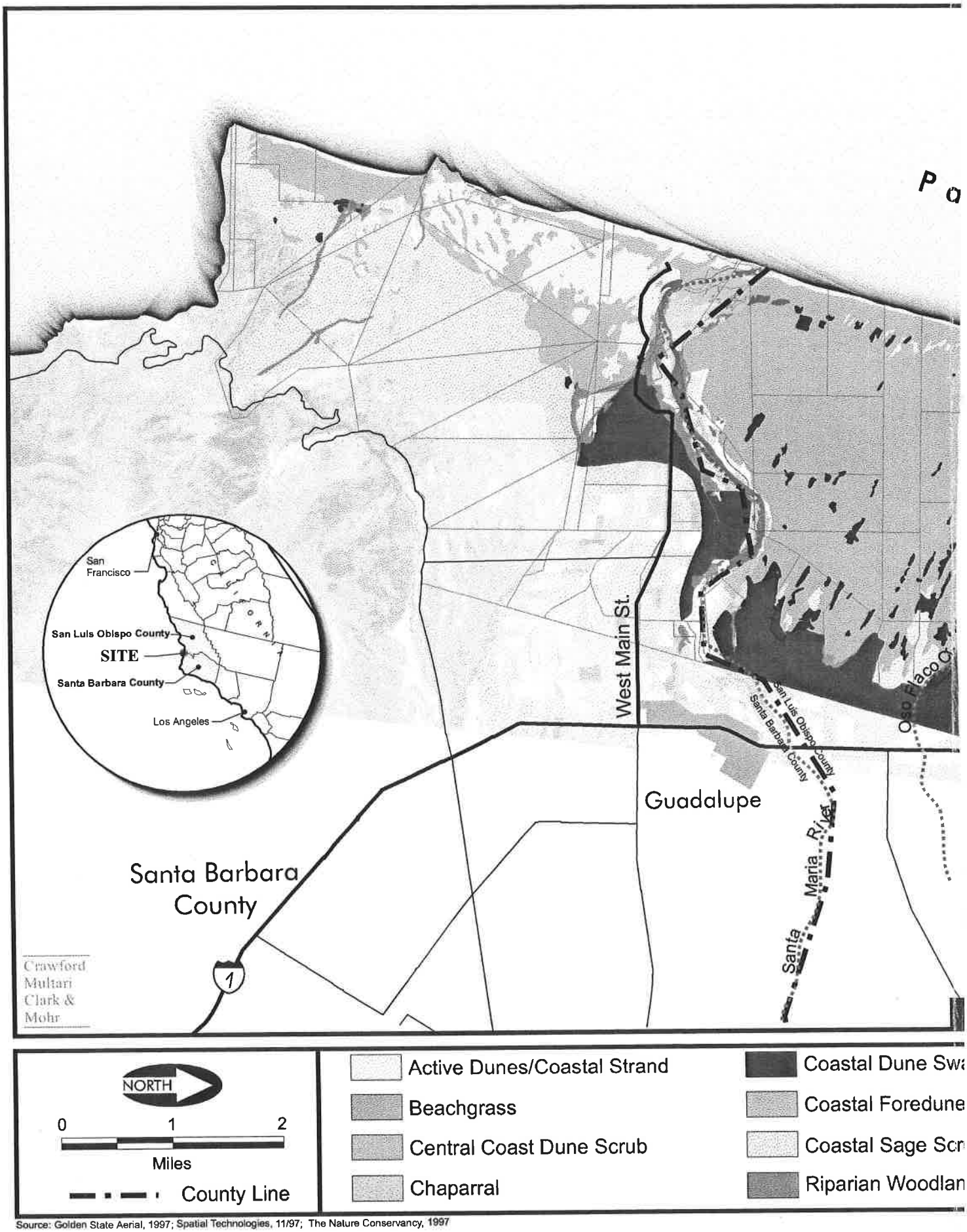


Mountain lions are known to frequent the Preserve

Table 5
Sensitive Animal Species of the Guadalupe-Nipomo Dunes

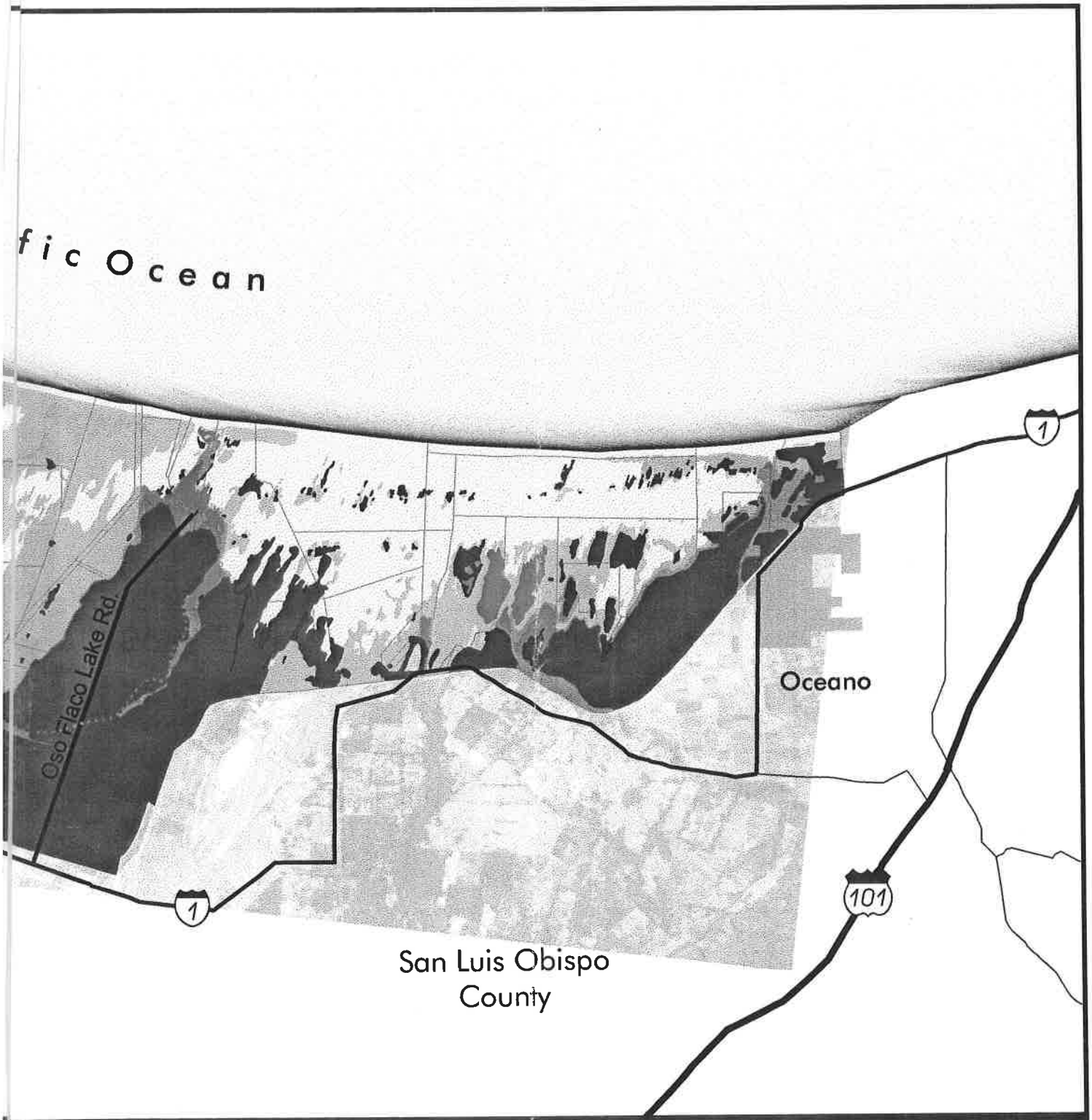
	Species	Common Name	Federal Status[1]	State Status
Birds	*Falco peregrinus anatum*	American peregrine falcon	E	E
	Sterna antaillarum browni	California least tern	E	E
		Brown pelican		
	Charadrius alexandrinus nivosus	Western snowy plover	T	SC
Arthropods	*Ammopelmatus muwu*	Point Conception Jerusalem cricket	C1	Arthropods are not listed by the State
	Cicindela hirticollis gravid	Sandy beach tiger beetle	C2	
	Necydalis rudei	Rude's longhorn beetle	C1	
	Lichnanthe albopilosa	White sand bear scarab beetle	C1	
	Coelus globosus	Globose dune beetle	C1	
	Icaricia icarioides moroensis	Morro Bay blue butterfly	C1	
	Chlosyne leanira	Oso Flaco patch butterfly	C1	
	Areniscythris brachypteris	Pismo dunes grasshopper moth	C2	
	Ablautus schlingeri	Schlingeri's robberfly	C2	
Fish	*Eucyclogobius newberry*	Tidewater goby	E	SSC
	Gasterosteus aculeatus	Three-spine stickleback	?	?
Reptiles	*Phrynosoma coronatum fontale*	California horned lizard		SSC
	Clemmys marmorata pallida	Southwestern pond turtle	SSC	SC
Mammals	*Taxidea taxus*	American badger	SSC	
		Southern sea otter		
Amphibians	*Rana aurora draytoni*	California red-legged frog	T	SC
	Scaphiopus hammondii	Western spadefoot toad	SSC	SSC
	Ambystoma tigrinum californiense	California tiger salamander	C1	

1. Refer to Table 1 for definitions.



Source: Golden State Aerial, 1997; Spatial Technologies, 11/97; The Nature Conservancy, 1997

2A



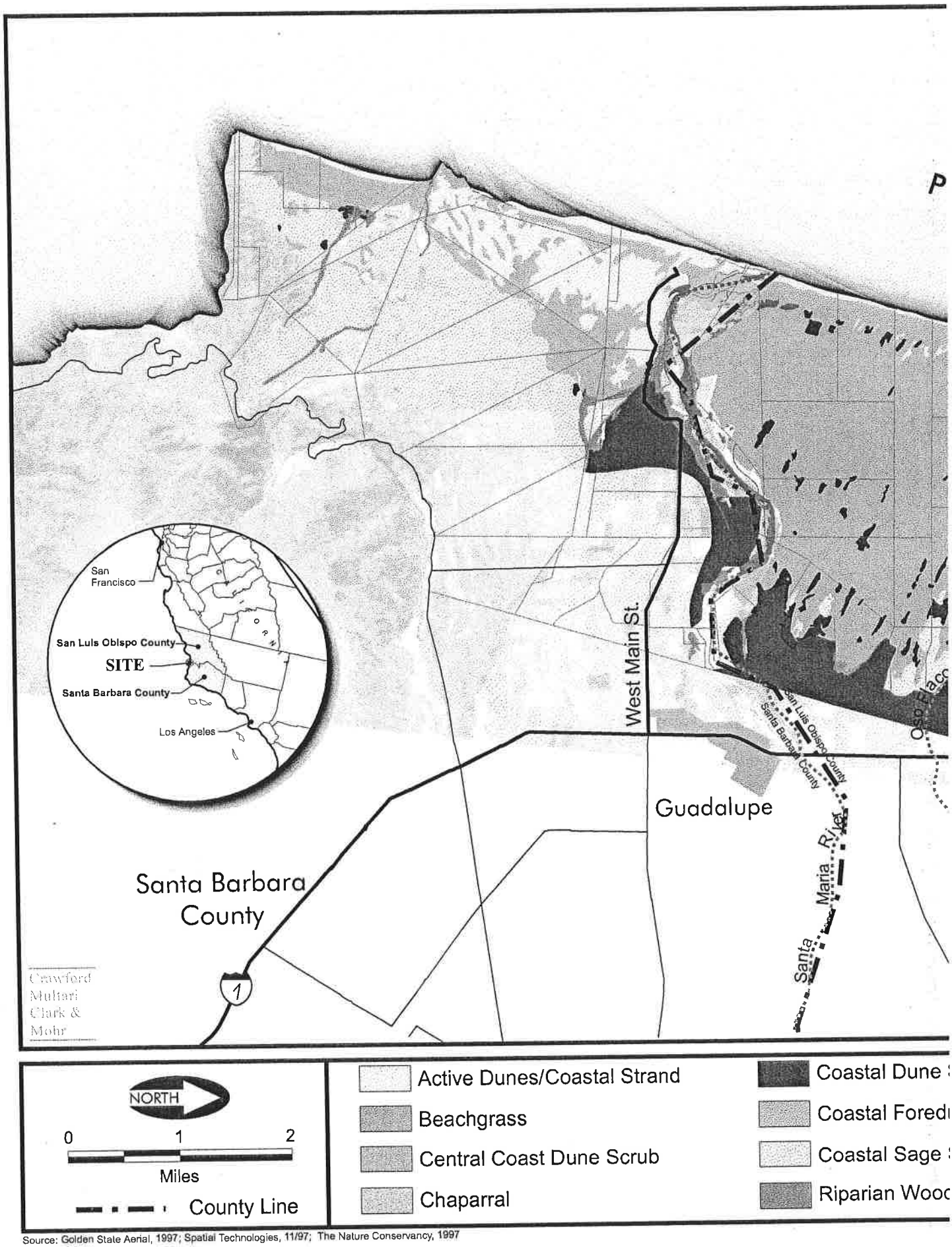
URF 2: Generalized Habitat Communities of the Guadalupe-Nipomo Dunes and Environs

- Developed/Disturbed
- Estuary
- Water Bodies
- Non-Native Forest/Agricultural Lands

crub

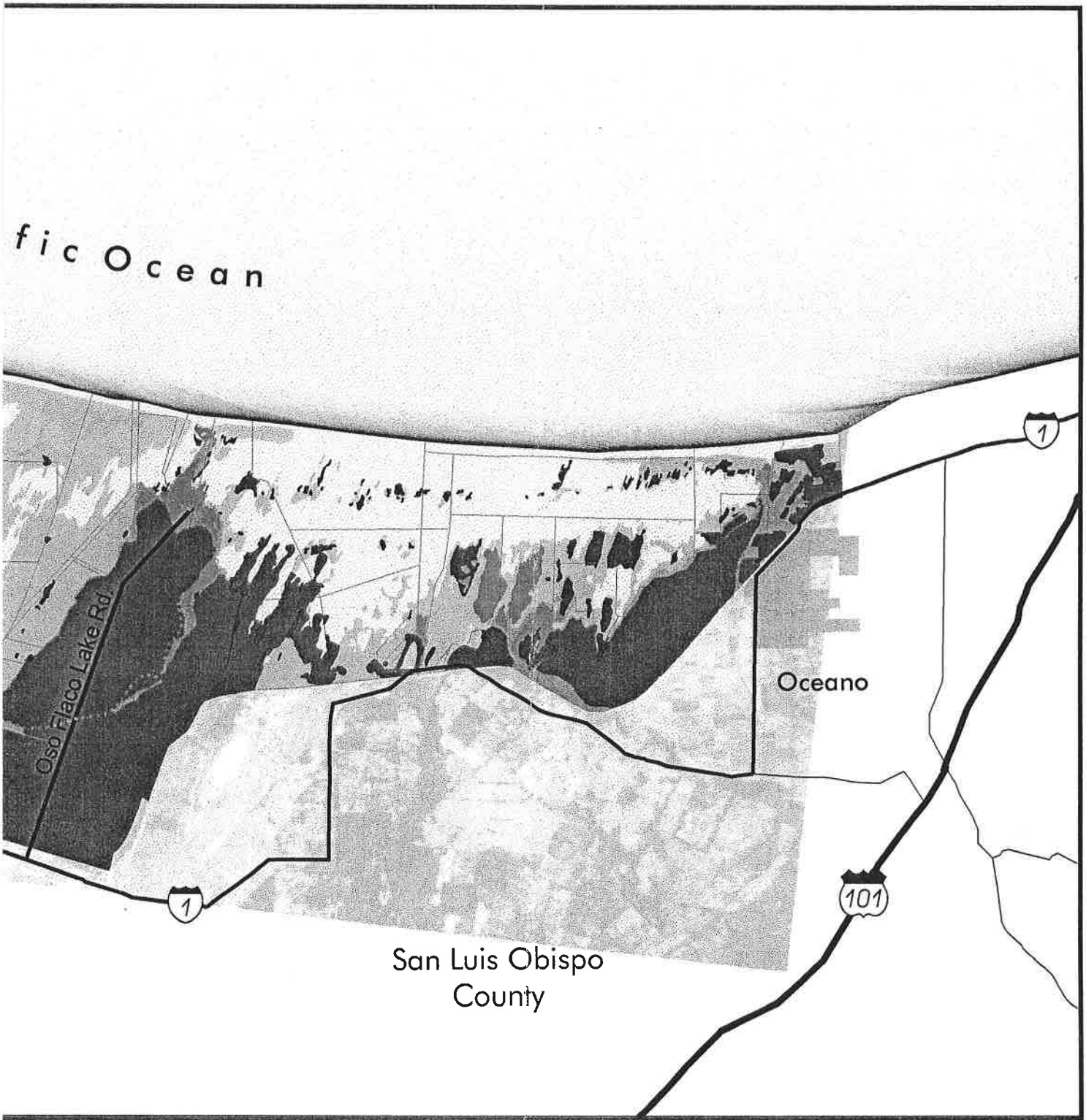
The Nature Conservancy

Coastal Conservancy



Source: Golden State Aerial, 1997; Spatial Technologies, 11/97; The Nature Conservancy, 1997

42A



URE 2: Generalized Habitat Communities of the Guadalupe-Nipomo Dunes and Environs

- Developed/Disturbed
- Estuary
- Water Bodies
- Non-Native Forest/Agricultural Lands

rub

The Nature Conservancy

Coastal Conservancy