



## CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
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# Th20a

**Prepared August 9, 2021 for August 12, 2021 Hearing**

**To:** Commissioners and Interested Persons

**From:** Susan Craig, Central Coast District Manager  
Kevin Kahn, Central Coast District Supervisor

**Subject: Additional hearing materials for Th20a (Oceano Dunes CDP Review)**

This package includes additional materials related to the above-referenced hearing item as follows:

Additional correspondence received in the time since the staff report was distributed



August 11, 2021

Steve Padilla, Chair  
California Coastal Commission  
1725 Front Street, Suite 300  
Santa Cruz, CA 95060

Jack Ainsworth, Executive Director  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, California 94105

Dear Chair Padilla,

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

The California Department of Parks and Recreation ("DPR") has reviewed the Revised Findings prepared by your staff for review by the Commission. While DPR has no substantive comments regarding the revisions recommended by the Revised Findings, it does continue to maintain its previous objections to, and comments on, the Commission's March 18, 2021 decision.

Our two agencies obviously share the same mission to protect the park's coastal resources for future generations and to ensure that all Californians have equal access to the park and its diverse recreational opportunities. DPR remains committed to working with your Commission to address the appropriate balance between access and preservation, consistent with our separate missions and legal mandates.

If you have any questions, please do not hesitate to contact me at (916) 653-8380.

Sincerely,

Armando Quintero  
Director

Mr. Padilla  
August 11, 2021  
Page Two

cc: California Coastal Commissioners:

Sara Aminzadeh  
Dayna Bochco  
Donne Brownsey  
Linda Escalante  
Carole Groom  
Meagan Harmon  
Caryl Hart  
Katie Rice  
Effie Turnbull-Sanders  
Roberto Uranga  
Mike Wilson

California Coastal Commission Staff:

Dan Carl, District Director  
Kevin Kahn, District Supervisor

Natural Resources Agency:

Mark Gold, Deputy Secretary for Ocean and Coastal Policy

California State Parks:

Liz McGuirk, Chief Deputy Director  
Sarah Miggins, Deputy Director, Off Highway Motor Vehicles Division  
Kevin Pearce, Acting District Superintendent, Oceano Dunes District  
Alexandra Stehl, Planning Chief, Strategic Planning

LAW OFFICES OF THOMAS D. ROTH  
1900 S. NORFOLK STREET, SUITE 350  
SAN MATEO, CALIFORNIA 94403  
(415) 508-5810  
[rothlaw1@comcast.net](mailto:rothlaw1@comcast.net)

August 6, 2021

**By E-mail**

Dan Carl  
Kevin Kahn  
Coastal Commission  
725 Front Street, Ste 300  
Santa Cruz, CA 95060

**Comments of Friends of Oceano Dunes on Proposed Revised Findings  
of the California Coastal Commission on the 1982 Permit Review;  
August 12, 2021, Agenda Item 20a**

Dear Government Officials:

This firm represents Friends of Oceano Dunes, a California nonprofit watchdog association, which represents approximately 28,000 members and users of Oceano Dunes SVRA (“Friends”), and member Jim Sutty. This letter is sent on behalf of Friends and its members, including member Jim Sutty.

Friends objects to the Coastal Commission’s proposed Revised Findings.

The CCC claims it has the authority to make unilateral changes to the 1982 permit. False. Friends has already detailed why this is not true in its previous comments and in its pending lawsuit, *Friends v. CCC*, SLO County Court Case No. 21cv-0246 (consolidated with 21cv-0214).

The CCC claims its decision on March 18, 2021 is “incontrovertible.” That’s the kind of arrogance that the world has come to expect from the CCC.

In the Synopsis, the CCC confirms again that it made findings regarding the draft PWP, even though the CCC never noticed the March 18, 2021 hearing as a review of the PWP. It highlights the CCC’s “bait and switch” in reviewing its own unilateral changes to the 1982 permit when it led everyone, including State Parks, to believe for the longest time that it would be reviewing the PWP. The CCC isn’t even consistent on this point, first claiming that it wasn’t reviewing the PWP, now claiming that it did. No wonder its own Commissioners were confused and attempted to clean up the record.

The CCC claims its unilateral changes to the 1982 permit don’t result in the closure of the park. Of course, that’s just semantics that wouldn’t fool a fifth grader. If the park

was expressly established as a park to allow OHV recreation, and the CCC purports to end OHV recreation, then it has effectively closed the OHV park. Attempting to convert to the park to some other use doesn't change that fact.

The CCC pays lip service to lower cost recreational opportunities while simultaneously ending ALL camping in the SVRA. What little camping it allows is outside the SVRA, and so poorly planned and placed that State Parks opines that it is wholly infeasible. Another farce by the CCC.

On page 4 of the Staff Report, staff claims that it is more clear today than in the past that OHV use is leading to disruption of ESHA. That's completely false and manufactured. There have been allegations of impacts to ESHA by OHV since the Coastal Act was adopted, and indeed that is, in part, what led to the 1982 permit with conditions. That is what led to permit amendments since 1982. In other parts of the Staff Report, the CCC claims there have been 40 years of debate regarding impacts. This is not a new issue and there is no evidence at all that impacts now are greater than in the past. That is a lie. There is no other way to say it. If anything, it's the exact opposite.

Also on page 4, the CCC claims that "evidence" demonstrates that OHV recreation is one of the most disruptive activities that could occur there. Again, totally false. What evidence? There is none because no agency has ever evaluated the question, "what is one of the most disruptive activities that could occur on the dunes?"

The CCC claims that OHV recreation changes the dune structure, but recreation does not do that anymore than planting vegetation or dust control. The latter activities have been proven to cause deep pits on the backside of the vegetation due to wind action. Why is that acceptable but less impactful changes by OHV recreation is not acceptable? The CCC provides no explanation.

The CCC claims it is "sensitive" to the impacts of closure to OHV recreation. Again, false. If the CCC were "sensitive," it wouldn't attempt end OHV recreation. Using words like "sensitive" doesn't help at all. It's like in the South, when someone says, "Well, God bless you." They don't really mean "God bless you." They usually mean the opposite.

Whether OHV is allowed at other locations in the State misses the point and is not relevant. None of the other OHV areas have the unique coastal experience found at Oceano Dunes.

On page 8, the CCC claims that it has worked with State Parks. Even Coastal Commissioner Mark Gold at the March 18, 2021 called out this lie. He said flat out that the CCC did not work with Parks but instead completely blind-sided Parks with its bait and switch.

The CCC's deletion of its acknowledgement that it could continue to allow OHV recreation here is telling. It simultaneously says that it must end OHV and that it could continue to authorize it. Well, which is it? Its post hoc deletion of the admission that it could continue use doesn't make the admission go away.

On pages 9-12, the CCC again, after saying it wasn't reviewing the PWP, reviews the PWP. This back and forth inconsistency is arbitrary and capricious and confusing to the public and other agencies.

The CCC violated CEQA by failing to undertake any environmental review of shortening the closure to three years from the original five years. The CCC added no meaningful analysis in the Revised Findings. It also violated CEQA by extending the date of closure of Pier Avenue by a year without any environmental analysis. It also violated CEQA by modifying its nighttime driving prohibition without environmental analysis. It also violated CEQA by failing to evaluate the environmental impacts of accelerating the seasonal restrictions by two years. It also violated CEQA by failing to analyze the environmental impacts of accelerating by two years the camping and vehicle limitations.

Under California Code of Regulations, title 14, § 13096 the CCC cannot adopt revised findings if those findings do not accurately reflect the CCC's stated reasons for its decision. Moreover, ignoring the Commissioners' statements is inconsistent with CCR, title 14, § 13094, which provides that the CCC's decision is final at the hearing after it votes to issue or deny a permit. Revised findings issued pursuant to the Coastal Act are meant to capture actions, not change them. Here, the CCC seeks to add traffic analysis after-the-fact in order to fill in gaps in its original record, not to capture what happened at the March 2021 hearing. Indeed, Commissioner Gold commented on the lack of traffic analysis as a result of closing Pier and shifting all traffic to Grande Ave. The CCC cannot fill in this oversight through the revised findings.

What little additional analysis that the CCC added to its revised findings, including a few small points on traffic impacts, is wholly conclusory, which does not comply with CEQA. It is also being added post hoc which violates CEQA. The entire point of CEQA is to make sure that the decision-makers are fully informed *before* they make their decision.

The remainder of staff additional analysis simply rehashes the issues and fails to refute the arguments previously made by Friends and others.

Sincerely,

/s/

Tom Roth

July 30, 2021

Jack Ainsworth, Executive Director, California Coastal Commission  
Steve Padilla, Chair, California Coastal Commission  
455 Market Street, Suite 300  
San Francisco, CA. 94105

Re: August 12, 2021 Meeting Agenda Item Th 20.a.

Dear California Coastal Commission Executive Director Ainsworth and Coastal Commission Chair Padilla,

The Off-Highway Motor Vehicle Recreation (OHMVR) Commission respectfully requests that the California Coastal Commission postpone any action on your August 12, 2021 meeting agenda item Th 20.a. regarding Revised Findings on Oceano Dunes Coastal Development Permit (CDP) Review.

The OHMVR Commission was just recently made aware of this agenda item and has not had the opportunity to review the staff report because it is not yet posted or available to the public for review.

In addition, the OHMVR Commission has its next regularly scheduled meeting on August 26-27, 2021 where Commission action and public comment can be taken to respond to the California Coastal Commission Revised Findings on Oceano Dunes CDP Review. The OHMVR Commission previously submitted a letter to the California Coastal Commission on March 10, 2021 regarding our serious concerns about the Staff Report to phase out off-highway motor vehicles at Oceano Dunes State Vehicle Recreation Area, to which we have not received a response.

The OHMVR Commission desires to build a better rapport and positive working relationship with the California Coastal Commission to better serve all of our interests to benefit California residents. We request your cooperation to postpone this agenda item until we have the opportunity to provide comments.

Sincerely,



Kimberlina Whettam, Vice Chair

California Off-Highway Motor Vehicle Recreation Commission

Cc: OHMVR Commission  
Coastal Commissioners  
California State Parks Director Armando Quintero  
Off-Highway Motor Vehicle Division Deputy Director Sarah Miggins  
CA Resources Secretary Wade Crowfoot

## Fw: Public Comment on August 2021 Agenda Item Thursday 20a - Oceano Dunes CDP Review

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

Fri 8/6/2021 5:56 PM

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

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**From:** Richard Wishner <rwishner@rwishner.com>

**Sent:** Friday, August 6, 2021 4:32 PM

**To:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** Public Comment on August 2021 Agenda Item Thursday 20a - Oceano Dunes CDP Review

Sir,

I support the three changes to the staff recommendations. Let's get the OHVs off of our beach.

Dick



## Fw: Public Comment on August 2021 Agenda Item Thursday 20a - Oceano Dunes CDP Review

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

Fri 8/6/2021 2:08 PM

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

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**From:** James L <jl@gccpack.com>

**Sent:** Friday, August 6, 2021 2:07 PM

**To:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** Public Comment on August 2021 Agenda Item Thursday 20a - Oceano Dunes CDP Review

Commissioners,

Pursuant to CDP 4-82-300, I am taking the opportunity to comment on the permanence of the three proposed modifications to the Staff Report. I am in opposition to anything that perpetuates camping or automobile use on the beach for a single day longer than the original staff recommendation and certainly not until 2024. This archaic and extremely dangerous practice must be discontinued immediately. Further, the use of Pier Avenue as an entrance should have been stopped as of July 1, 2020 not extended for an additional year. Most importantly the compromise permitting beach camping and street legal driving INDEFINITELY is foolish and unnecessary. What is the point of this compromise? The 1.5 mile stretch cannot possibly safely accommodate all the cars and people interested in threading that needle. As it is, during periods of high tide, the area is ridiculously narrow.

There are multiple points of entry for people to walk in to enjoy the area. The use of automobiles to gain access was proven false during the period of time last year when the beach was closed. Kite surfers, fishermen, surfers and beach goers were all able to bring in their equipment with no difficulty. Why go back to an antiquated process again?

Eliminating the practice of driving all over the dune area for pleasure is an excellent step in the right direction for a myriad of reasons but to leave loopholes and half measures to remain on place or delay implementation goes against the original spirit of the staff directives and should not be accepted.

James Letzel  
1632 Strand Way  
Oceano

PH: 949.456.0901



## *Concerned Citizens for Clean Air*

August 6, 2021

Subject: Comments to Coastal Commission re Hearing Date of August 12, 2021,  
Agenda Item Th.20a, Oceano Dunes CDP 4-82-300 Review

Dear Commissioners and Staff,

We are writing to support staff recommendations to adopt modified findings and conditions that reflect your March 18, 2021 decision regarding the Oceano Dunes.

We agree with the staff report conclusions that actions approved by the Commission on March 18 followed the constructs of the staff report and made only minor modifications to the dates for specific actions to be completed. Another minor modification to allow limited nighttime vehicular access to the Oceano Dunes within the designated camping areas between Grand and Pier Avenues was made for practical reasons to allow campers access to their campsites.

The recommended motion should be adopted and approved as submitted.

Sincerely,

Arlene Versaw and Rachelle Toti  
Co-founders of Concerned Citizens for Clean Air

## Fw: Public Comment on August 2021 Agenda Item Thursday 20a - Oceano Dunes CDP Review

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

Fri 8/6/2021 2:08 PM

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

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Eliminating the practice of driving all over the dune area for pleasure is an excellent step in the right direction for a myriad of reasons but to leave loopholes and half measures to remain on place or delay implementation goes against the original spirit of the staff directives and should not be accepted.

James Letzel  
1632 Strand Way  
Oceano

PH: 949.456.0901

## Please oppose restricting or ending powersports access to Oceano Dunes SVRA

Dodd Stange <user@voterveice.net>

Thu 8/5/2021 9:00 PM

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

Dear District Supervisor Kahn,

As an outdoor enthusiast who enjoys powersport activities, I'm concerned about the proposed Public Works Plan (PWP) for Oceano Dunes State Vehicular Recreation Area (ODSVRA) which was released on December 30, 2020. I am opposed to several provisions in the proposed PWP.

As drafted, the proposed PWP supports reducing and ultimately even eliminating off-highway vehicle recreation at ODSVRA. Within the PWP, the most concerning proposals are:

- Proposes an immediate 42 percent reduction of OHV day-use limits, from the current 1,720 vehicles/day, down to 1,000/day (p. 78 of the PWP).
- Proposes ending OHV/ATV rental concessions when their current contracts expire in 2022. Phasing out of OHV rental concessions would require visitors to bring in their own OHVs and would impact low- and middle-income individuals. (p. 79 of the PWP).
- Proposes an Environmental Impact Review (EIR) alternative to consider phase-out of OHV recreation over five years (see Volume 3, Chapter 2, Alternatives).
- Proposes to conduct an "independently peer-reviewed carrying capacity study" to determine appropriate limits for beach camping and day-use by OHVs and street-legal vehicles and update use limits accordingly, which could further limit access/use by OHV in the SVRA (p. 76 of the PWP).

The off-highway vehicle community strongly advocates for responsible use of our natural resources and ensuring powersports enthusiasts are well-trained in the proper use of their vehicles to foster an enjoyable and safe riding environment. Many people cannot afford to purchase their own vehicles and eliminating the rental option is something that would not only kill local jobs, but would also disenfranchise lower income individuals who rely on the ability to rent powersports equipment. The Oceano Dunes SVRA has been a significant part of many individuals' lives in the outdoor recreation community. It has been a place for people worldwide to gather and enjoy powersport use and beach camping. The proposed PWP could end access to the park for many Californians, hundreds of thousands of individuals, and their families who have been recreating the dunes for decades. At a time when so many people have turned to outdoor recreation as a form of stress release, we should be looking at ways to expand recreation opportunities, not eliminate them.

Please strike these provisions from the PWP and preserve access for a diverse group of recreation interests at Oceano Dunes SVRA.

Sincerely,

Dodd Stange  
140 Arlington Dr  
Petaluma, CA 94952

8/6/2021

Mail - OceanoDunesReview@Coastal - Outlook

dana-darla@msn.com

## Oceano Dunes comments

howardktg <howardktg@gmail.com>

Thu 8/5/2021 12:03 PM

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

Please consider stopping the ever-increasing restrictions on OHV, camping and public use of the Oceano Dunes Beach area. This is the last vehicle accessible Beach in California and has been a healthy outdoor activity for many families, for Generations.

The footprint of the area is so fractionally small compared to the entire size of the state, it is quite selfish not to allow the public to enjoy this treasure, as they have done for Generations.

With California's expanding population, the public needs more access to the public lands and the sensible thing to do would be to open up the beach back to it historic size that it was 40 years ago.

Sincerely,  
Howard Hughes  
Madera

## Aug. 12th hearing

Pam Nelson <pamela05n@yahoo.com>

Thu 8/5/2021 11:05 AM

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

I'd like to comment on the permit to be discussed for Oceano Dunes. I was thrilled to see that the Commission was restricting OHV use with changes to CDP 4-82-300. This has been a long time coming.

Allowing this use for decades has endangered humans and wildlife for too long.

Please keep the strictest possible limits on use, as is feasible.

I know that OHV use is proposed to be phased out by 2024. The staff recommended a later date, but I say why wait until 2024? Close the use today!

As for beach camping and OHV use between W. Grand Ave and Pier, I disagree. Using the beach as a campground continues to show a disregard for the importance of our coastlines. Pollution, compaction, noise, to name a few impacts that are generated by this use should be eliminated by a phase out of this use. I don't like the possible indefinite use statement.

Thanks,  
Pam Nelson  
Warner Srprings,  
CA 9086

## Comment to OCEANO DUNES CDP REVIEW

jdtarabini@gmail.com <jdtarabini@gmail.com>

Mon 8/2/2021 7:07 PM

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

Hello,

Please maintain the ruling that OHV use be discontinued by January 1, 2024.

Sincerely,

John and Sharol Tarabini  
1422 Vista Tesoro Place  
Nipomo, CA 93444  
925-899-0834



## Oceano Dunes CDP 4-82-300 As Amended

William Bailey <swbailey3@gmail.com>

Sun 8/1/2021 2:30 PM

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

Dear Coastal Commission Members:

As a local resident, I have carefully followed the California Coastal Commission (CCC) regarding the Oceano Dunes. I am thrilled to know that the CCC March 18, 2021 findings support long-needed changes to the "allowable kinds, locations and intensities of use..." of the Oceano Dunes. I completely support the CCC plan to eliminate OHV from the area and only wish it could be done immediately.

The plan proposed by the State Park's Oceano Dunes unit in the City of Grover Beach, the unincorporated community of Oceano, and unincorporated southern San Luis Obispo County was not in any way acceptable and, if implemented, would have been illegal and had disastrous environmental and social consequences for the local area. After all the opportunities the State Park's have been given to investigate and mitigate the many problems caused by OHV use and the tenor of the plan proposed by State Parks it is obvious they had no intention to comply with California law.

I support both the staff recommendations and the minor changes to those recommendations being considered in the Agenda Item 20a of the August 13, 2021 CCC hearing. I have carefully reviewed those changes and believe them to be in keeping with the outcome of the March 18, 2021 CCC actions.

I so very much appreciate all the effort that has been put into making this wise decision.

Regards,  
Sheffield William Bailey, III

## Dunes

kayaker paddler <kayakersandcat@gmail.com>

Sat 7/31/2021 2:30 PM

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

I fully support removing any motorized vehicle use at Oceano Dunes. This has been going on far too long and does too much damage. There are species in critical danger who have nowhere else to go, and managing this property for biodiversity protection and ecosystem restoration must be the highest management objective. This should happen immediately. Five years is too long!

Irene Schmidt

Sent from my iPad

## Oceano Dunes

bill house <pirate805@gmail.com>

Fri 7/30/2021 1:09 PM

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

As a resident of Oceano, I continue to support the new conditional use permit and revisions approved at the March 18, 2021, Coastal Commission meeting.

Working together we can protect the environment, public health, air quality and bring social justice to the Oceano Dunes.

Thank you.

## Fw: Public Comment on August 2021 Agenda Item Thursday 20a - Oceano Dunes CDP Review

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

Fri 7/30/2021 9:27 AM

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

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**From:** Rusty & Marilyn Smith <rustybws@pacbell.net>

**Sent:** Friday, July 30, 2021 9:16 AM

**To:** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** Public Comment on August 2021 Agenda Item Thursday 20a - Oceano Dunes CDP Review

Help restore the coast for all Californians. Stop off roading. Please.

Marilynn Smith

1598 Hillmont Avenue

San Jose, CA 95127

## Please oppose restricting or ending powersports access to Oceano Dunes SVRA

Lisa Delaney <user@votervoice.net>

Thu 7/29/2021 6:10 PM

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

Dear District Supervisor Kahn,

As an outdoor enthusiast who enjoys powersport activities, I'm concerned about the proposed Public Works Plan (PWP) for Oceano Dunes State Vehicular Recreation Area (ODSVRA) which was released on December 30, 2020. I am opposed to several provisions in the proposed PWP.

As drafted, the proposed PWP supports reducing and ultimately even eliminating off-highway vehicle recreation at ODSVRA. Within the PWP, the most concerning proposals are:

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The off-highway vehicle community strongly advocates for responsible use of our natural resources and ensuring powersports enthusiasts are well-trained in the proper use of their vehicles to foster an enjoyable and safe riding environment. Many people cannot afford to purchase their own vehicles and eliminating the rental option is something that would not only kill local jobs, but would also disenfranchise lower income individuals who rely on the ability to rent powersports equipment. The Oceano Dunes SVRA has been a significant part of many individuals' lives in the outdoor recreation community. It has been a place for people worldwide to gather and enjoy powersport use and beach camping. The proposed PWP could end access to the park for many Californians, hundreds of thousands of individuals, and their families who have been recreating the dunes for decades. At a time when so many people have turned to outdoor recreation as a form of stress release, we should be looking at ways to expand recreation opportunities, not eliminate them.

Please strike these provisions from the PWP and preserve access for a diverse group of recreation interests at Oceano Dunes SVRA.

Sincerely,

Lisa Delaney  
1706 Haven Pl  
Newport Beach, CA 92663

8/3/2021

Mail - OceanoDunesReview@Coastal - Outlook

delaneylisa2000@yahoo.com