



OFF-HIGHWAY MOTOR VEHICLE RECREATION COMMISSION

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March 10, 2021

Armando Quintero, Director, California State Parks and Recreation Department
Sarah Miggins, Deputy Director, Off-Highway Motor Vehicle Division, California State Parks and Recreation Department

Attention: Strategic Planning and Recreation Services Division
1725 23rd Street, Suite 200
Sacramento, CA 95816

Re: Pismo State Beach and Oceano Dunes SVRA Public Works Plan

Dear Director Quintero and Deputy Director Miggins,

The Off-Highway Motor Vehicle Recreation (OHMVR) Commission would like to thank the California State Parks project management, recreation and resource planning staff and environmental consultants for preparing the Public Works Plan and Environmental Impact Report for Pismo State Beach and Oceano Dunes State Vehicular Recreation Area (SVRA). The Public Works Plan and Environmental Impact Report is very thorough, provides important historical context, documents environmental conditions and reviews the proposed park improvements, resource protection measures, and small and large development proposals. Park staff and consultants also did extensive outreach to resource agencies, Native American Tribes, the public and stakeholders. The Commission supports the Public Works Plan goals of sustainability, enhancing visitor experiences and transparency in decision making. However, the Public Works Plan is missing a critical component addressing enhancing visitor experiences for the Off Highway Vehicle (OHV) recreation community.

The Commission has discussed the Public Works Plan and received numerous public comments at the unscheduled Commission meeting on February 18, 2021 and the regularly scheduled Commission meeting on February 26, 2021. The Commission recommends the following measures be incorporated into the final Public Works Plan to enhance and improve the Oceano Dunes SVRA visitor experience:

1. Trash and Predator Management

Trash management has been an ongoing issue at Oceano Dunes SVRA for many years and distracts from the overall visitor experience, as well as adding an attractive nuisance for wildlife predators. All of the trash and predator management measures identified in the Public Works Plan should be implemented as part of ongoing maintenance. The Commission strongly encourages the Oceano Dunes District to address this urgent ongoing park management issue as soon as possible. In addition, park management should work with the many OHV and All-Terrain Vehicle (ATV) user groups to help with ongoing trash management through educational and volunteer clean-up programs, e.g. Don't Trash Our Park," etc.

2. Vehicle Use Limits and Carrying Capacity Study

Historically the daily vehicle use limits at Oceano Dunes SVRA has been 2,580 street legal, 1,720 OHV and 1,000 camping vehicles. Currently the daily vehicle usage limits have been reduced (on an interim basis due to COVID Phase 2 re-opening plans) to 1,000 street legal, 1,000 OHV and 500 camping vehicles. The Public Works Plan proposes maintaining the current reduced use limits while undertaking a carrying capacity study in coordination with other resource agencies and/or educational institutions. The Commission does not agree with the interim use limits and would like to see the historic daily vehicle use limits restored under COVID Phase 3 re-opening plans. We agree that completing an updated carrying capacity study makes sense prior to setting future vehicle use limits. We also would like to see a firm schedule for the carrying capacity study.

3. OHV/ATV Beach Camping Limitations

The Public Works Plan proposes designation of a beach camping area of 2,000 square feet maximum per Recreational Vehicle (RV)/OHV/ATV campsite. The Commission is concerned about the overall safety of this size limitation. This camping area limitation should be analyzed further with consideration of the safety requirements for trailered vehicles, OHVs, ATVs, RVs, for overall visibility, especially for ingress and egress to the camping area.

4. Pier Street and Grand Avenue Access Improvements

The Public Works Plan proposes to designate the Pier Street and Grand Avenue entrances to Pismo State Beach and Oceano Dunes SVRA permanent and to construct two-story lifeguard towers and restroom improvements at these entrances. The Commission would also like to see a new lifeguard tower and restroom in the OHV riding area to improve public safety and amenities. The Commission would like to suggest a closer look at how OHV trust funds are allocated for the Pier Street and Grand Avenue lifeguard towers to ensure an accurate cost share between OHV and non-OHV use. In addition, the Commission would like to see plans for enhancing traffic flow, staging areas, vehicle safety, reservation systems, directional and informational signage, use of renewable energy, and electric vehicle infrastructure.

5. New Southern Access Route

The OHV community has been asking for a southern access route to Oceano Dunes SVRA for many years to enhance public safety and visitor experience. Members of the public have recently brought up an opportunity to explore a new southern access route on an existing park maintenance road from Highway 1 adjacent to the Phillips 66 property (Willow Road). The Commission strongly encourages park planning and engineering staff to review this alternative and (if feasible) include it in the Public Works Plan and Environmental Impact Report as a near term development project.

6. Oso Flaco Lake Development and Access Plans

The proposed initial and future development plans will certainly benefit many visitors to the Central Coast, but does not provide any new benefits to OHV users. The Commission would like to see serious consideration of a southern access road from the Oso Flaco Lake area that increases the connectivity of the SVRA for OHV/ATV users, as well as providing motorized access to non-motorized recreational areas. The Commission supports the protection of the sensitive plants and animals at Oso Flaco Lake and the goal to avoid all “incidental and direct take” of protected species

7. Night Riding

The Biodiversity Management Plan suggests developing a study in cooperation with the California Department of Fish and Wildlife to determine the impacts of OHV night riding on the natural resources and protected wildlife in the Oceano Dunes SVRA. The study proposal would involve closing night riding during part of the study period to assess controlled and uncontrolled conditions. The Commission would like to see additional justification and analysis on the effects of OHV night riding, a timeline for the proposed study, and completion of the proposed study analysis with public comment prior to any proposal to eliminate OHV night riding.

8. 40 Acre Riding Trail Improvements

The OHV community has been asking for specific plans for development of the 40-acre area in the southern portion of Oceano Dunes SVRA. The Commission would like to see the trail system development included in the Public Works Plan and Environmental Impact Report as a near term development project.

9. OHV/ATV Beginning Rider Trails

The Public Works Plan identifies concerns about inexperienced OHV/ATV riders at Oceano Dunes SVRA. The Commission would like the Public Works Plan and Environmental Impact Report to consider designating trail routes or areas through the SVRA that identify skill levels, safety equipment and other requirements, as well as beginning rider instruction and safety training areas.

10. Additional SVRA Opportunities for OHV Use

The Commission would like further assessment and analysis in the Public Works Plan and Environmental Impact Report that reviews all Oceano Dunes SVRA lands that have been previously closed to OHV/ATV use that can be opened up to provide additional visitor amenities such as OHV/ATV riding, camping, safety training areas, or other activities.

11. Rental Concessionaires

The Public Works Plan proposes to phase out OHV and ATV rental concessions as those contracts expire. The justification for this proposal is to limit inexperienced OHV riders at Ocean Dunes SVRA. By eliminating rental concessions, the Public Works Plan is limiting the use of the SVRA to only those

that can afford to purchase and transport their own (expensive) OHV/ATV vehicles. In addition, many experienced OHV/ATV visitors may prefer to drive their fuel-efficient passenger vehicles to Oceano Dunes SVRA and rent an OHV/ATV vs driving an inefficient large engine truck with trailered OHV/ATVs (which helps to reduce overall greenhouse gas emissions). This proposal does not align with the goals of the Public Works Plan to ensure diversity, affordability, enhanced tourism and local business support. The Commission would like to see alternatives rather than complete elimination of OHV and ATV rental concessions such as: an OHV/ATV rental reservation system, off-site trailer parking to increase OHV beach camping use, enhanced professional safety qualifications for concessionaires, OHV/ATV guided tours, and perhaps a concessionaire to provide beginning rider classes. The Public Works Plan and Environmental Impact Report should include consideration of OHV and ATV rental concession alternatives.

12. Arroyo Grande Crossing

The Biodiversity Management Plan suggests a depth limit criterion for closing OHV crossings of Arroyo Grande Creek, as well as studying the feasibility of a temporary seasonal crossing structure. The Commission supports protection of water quality and aquatic species found in Arroyo Grande Creek and would like to see consideration of a temporary seasonal crossing structure included in the Public Works Plan and Environmental Impact Report as a near term development project.

13. Habitat Conservation Plan Implementation

The Commission supports incorporating as appropriate, the species-specific Avoidance and Minimization Measures from the draft Habitat Conservation Plan into the Public Works Plan and Environmental Impact Report to ensure all plans are compatible and inform the public. The Commission also strongly supports the compliance with all laws and regulations, including the Federal Endangered Species Act.

14. Biodiversity Management Plan Implementation

The Biodiversity Management Plan, developed in consultation with the California Department of Fish and Wildlife, appears to be a voluntary agreement that may lead to the development of a Natural Communities Conservation Plan in order to comply with the California State Endangered Species Act. Some avoidance measures proposed in the Biodiversity Management Plan increases seasonal and nesting buffers for protected shorebirds which will further reduce OHV riding areas. The Oceano Dunes SVRA Wildlife Habitat Protection Plan has shown great success in increasing the snowy plover breeding adult population as well as least tern breeding adults since 2002 while balancing responsible OHV recreational use through installing seasonal nesting area exclosures. The Commission supports compliance with all laws and regulations, including the CA Endangered Species Act and urges the park resource staff to minimize further reductions to OHV riding areas.

15. Phillips 66 and Future Land Acquisitions

The Commission supports investigating future land acquisitions for adjacent properties to the Pismo Dunes State Park and Oceano Dunes SVRA in order to provide additional recreation and OHV opportunities for the public. The Phillips 66 land purchase is a “no regrets” opportunity and the Oceano District should pursue aggressively with expectation for full remediation responsibilities retained by the property owner. The Phillips 66/Southern Entrance Project may be very beneficial for State Parks but the remediation clean-up and timeframe for completion of any future development is likely to be at least 10 years into the future. The Commission would like the Public Works Plan to focus primarily on near term park access improvements while not foreclosing consideration of future projects and land acquisitions.

16. OHV Trust Funds

The Public Works Plan cost analysis showed that the OHV trust fund contributed about 45 percent of the cost for developing the Public Works Plan and Environmental Impact Report. The Commission would like the planning and project management staff to review these costs to ensure the proper allocation of expenditures between OHV trust fund and non-OHV funds.

The Commission commends the California State Parks staff and consultant for preparing the comprehensive Public Works Plan and Environmental Impact Report. The Commission supports ongoing responsible OHV/ATV and non-OHV recreation use at Pismo State Beach and Ocean Dunes SVRA to ensure diverse public access for young and old, physically limited, beginners and experts, for individuals and families. The Commission also supports compliance with all laws and regulations including the California Coastal Act, Clean Air Act, Clean Water Act, Federal and State Endangered Species Acts and the California Environmental Quality Act to ensure long term sustainable OHV/ATV recreation.

The Public Works Plan identifies many large and small projects that will greatly improve the visitor experience at the existing facilities located throughout the Pismo State Beach that the Commission generally supports. The Commission wants the Public Works Plan to also reflect large and small projects that improve the visitor experience at Oceano Dunes SVRA for OHV use.

Thank you for the opportunity to provide comments on the Public Works Plan.

Respectfully yours,



Patricia G. Ureña, Chair
OHMVR Commission

cc: OHMVR Commissioners

OceanoDunes.PWP.EIR@parks.ca.gov