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January 23, 2026

State of California / Natural Resources Agency
California Department of Parks and Recreation (DPR)
Off-Highway Motor Vehicle Recreation (OHMVR) Division
1725 23rd Street, Suite 200
Sacramento, CA 95816

Comments Submitted via email to comments@oceanoduneshcp.com
Attention: Ronnie Glick, Senior Environmental Scientist

Subject: Comments Re: DPR recirculated Oceano Dunes District Habitat
Conservation Plan (HCP) and DEIR/DEA (SCH# 2018011012).

Please see the comments below related to the HCP and approximately 3500-acre
Oceano Dunes State Vehicular Recreation Area (ODSVRA).

Chapter 7. FUNDING

The HCP covers ten (10) federally listed plants and animals. This number is infinitesimal as compared to the total number of species that utilize the ODSVRA. Spending \$97 - \$110 million over the next 25-years to manage, protect and conserve the 10 individual plants and animals covered would likely fail a cost/benefit analysis. Creating more continuous open space that eliminates vehicle access along the beach and around the Pismo Dunes Natural Preserve (PDNP) including the Arroyo Grande Creek mouth would better serve the purpose. In doing so, not only would many of the covered species in the HCP be conserved, but a myriad of other species would also benefit. The management of species individually appears to be less efficacious than a multi-species habitat conservation approach, especially in this instance. The draft HCP does not demonstrate a favorable cost/benefit ratio to warrant proceeding with the current funding regime.

Chapter 8. ALTERNATIVES Project Alternatives Considered and Rejected

Changes in SVRA access - Changing the primary entrance to the ODSVRA at the closed oil refinery (Phillips) would allow Pier Ave. in Oceano to be closed to beach access by vehicles. This commenter supports using the existing and proposed Offer-to-Dedicate (OTD) alignment at Phillips for access to the ODSVRA. The closure of the Pier Ave. sand ramp to vehicle access to the beach (except for emergencies) would eliminate the Arroyo Grande Creek crossing, and subsequently the need for it to be a covered activity. It appears all of the animals covered in the HCP are adapted to freshwater habitats making Arroyo Grande Creek, its estuary, and the

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contiguous PDNP vitally important to conservation of all species that utilize the ODSVRA. The protection of Arroyo Grande Creek should be the centerpiece of a HCP mitigation program. A new entrance to the ODSVRA at Phillips should be further considered as an alternative in this draft HCP.

Restricted riding times - All nighttime dune riding should be prohibited, if not already. In reviewing the January 1, 2024 DPR Order No. 554-005-2024, Vehicle Operations directive in Appendix B, it does not appear nighttime riding is prohibited. Moreover, given “restricted riding times” as a project alternative is being dismissed in the HCP, the commenter must conclude nighttime riding will continue, however should be reversed.

Please reject the draft HCP and Proposed Environmentally Superior Alternative as presented. Consequential mitigation should be cost effective and include multiple species and in this case, could be achieved with the prohibition of vehicles along all beachfront from the current Pier Ave. entrance to approximately mile marker 3.75 fronting the PDNP.

Furthermore, it is unclear how the HCP relates or “dovetails” with other conservation and habitat protection plans in effect at the ODSVRA. Examples include; but are not limited to, the Biodiversity Management Plan and the Wildlife Habitat Protection Plan. Likewise, current dust mitigation strategies pursuant to the Stipulated Order of Abatement often conflict with habitat management efforts by creating landscapes unsuitable for covered species, the Western Snowy Plover being such an instance. A discussion of how the HCP would work in concert with other conservation and mitigation efforts in the ODSVRA would appear to be constructive and informative.

In conclusion, it is this commenter’s opinion, the draft HCP does not advance the prospects of a future for the ODSVRA. As a practical matter, the HCP attempts to reinforce the notion of maintaining the status quo for the ODSVRA. In a post-Coastal Commission closure litigation period, it appears there is a limited amount of time to make major changes to the ODSVRA and its operations. Without specific changes and adaptations, some of which were dismissed in the HCP, permanent closure of the park to vehicles is becoming increasingly likely. Accordingly, there may be adverse economic implications from the closure of the ODSVRA. While it is unlikely the ODSVRA visitor-ship contributes the \$500 million often cited, it could be responsible for as much as 10% of San Luis Obispo County’s \$1 billion hospitality and visitor-serving sector.

Sincerely,

Jeffrey H. Edwards

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