

March 18, 2019

Katie Metraux
Acting OHMVR Planning Manager
California Department of Parks and Recreation
1725 23rd Street, Suite 200
Sacramento, CA 95816

Dear Ms. Metraux,

Audubon California, a state office of the National Audubon Society, is submitting comments for the Oceano Dunes State Vehicular Recreation Area Public Works Plan (PWP), specifically Project A: Oso Flaco Campground and Public Access Project. We are joining our local partner, Morro Coast Audubon Society, **in opposing both proposed concepts, 1 and 2, for Oso Flaco Lake area. We fully support and refer to all comments provided in Morro Coast Audubon's letter.**

The 22,000 acres Guadalupe-Nipomo Dunes Complex is an ecological gem that is critical habitat to hundreds of coastal species, and provides protection for 63 federal and state listed species. One of the best representations of this unique ecosystem is found at the Oso Flaco Lake Natural Area. Oso Flaco Lake is part of the **Santa Maria River Valley Important Bird Area**, designated by National Audubon Society in 2004. It is designated an IBA because of the unique habitats in the riparian areas, dunes, and beach and the number of sensitive species these habitats support.

Forty years ago, the Oso Flaco Lake region was recognized as the most unique and fragile ecosystem in the state of California. It was ranked 1st on a list of 49 habitat areas in need of protection statewide. This current 2019 proposal undermines the multi-decade efforts of The Nature Conservancy, The Land Conservancy of San Luis Obispo, the U.S. Fish and Wildlife Service, the California State Coastal Conservancy, and the many local environmental visionaries who pioneered conservation efforts at Oso Flaco.

The reason the Guadalupe-Nipomo Dunes National Wildlife Refuge, part of the Dunes Complex and located just south of Oso Flaco Lake, was created in 2000 was to conserve Central California coastal dune and associated wetland habitats, and to support the recovery of sensitive native plants and animals. The current PWP is contrary to those goals. The Refuge's Final Comprehensive Conservation Plan from 2016 states that "Oso Flaco Lake and Little Oso Flaco Lake are located about 1 mile north of the northern Refuge boundary on land owned by the State of California in the ODSVRA. These two small freshwater lakes and their adjacent wetlands are supplied with surface water from Oso Flaco Creek, which receives the bulk of its water supply from agricultural runoff. As a result, Oso Flaco Creek, Oso Flaco Lake, and Little Oso Flaco Lake have become contaminated with fertilizers, pesticides, and other agricultural chemicals, and each is classified as an impaired waterbody (RWQCB 2008; EPA 2010; RWQCB 2012)."¹

It is our opinion that State Park funds would be better spent addressing water quality issues at the Lake and protecting and improving these rare natural resources rather than diminishing their value by increasing consumptive use and destroying these habitats. We believe the impacts of the proposed PWP to the region's unique ecosystem are likely to be far-reaching, as they would effectively destroy the present values of the Oso Flaco Lake Natural Area.

The Oso Flaco Lake Natural Area region is critical habitat along the Pacific Flyway for migratory birds. The rare willow riparian habitat hosts numerous songbird species during migration and many sensitive breeding bird species. The list of special status bird species known to breed in the Oso Flaco Lake area include:

¹https://www.fws.gov/uploadedFiles/Region_8/NWRS/Zone_1/Hopper_Mountain_Complex/Guadalupe-Nipomo_Dunes/Sections/What_We_Do/Conservation/GNDNWR_FINAL_CCP.pdf

- Western Snowy Plover, federal threatened, CA species of special concern
- CA Least Tern, federal endangered, state endangered, CA species of special concern
- Least Bittern, CA species of special concern
- Northern Harrier, CA species of special concern
- Loggerhead Shrike, CA species of special concern
- Yellow Warbler, CA species of special concern

Oso Flaco Lake is mentioned in the California Least Tern Recovery Plan from 1985. The Lake is included in Management Area B, San Luis Obispo County and states under the Recovery section "Preserve and Manage Nesting Habitat": "protecting important nonnesting, feeding, and roosting habitats from detrimental land or water use changes in San Luis Obispo County...Oso Flaco and Dune Lakes (San Luis Obispo county)"² This PWP directly conflicts with the Least Tern Recovery Plan.

In addition to listed species, other California Bird Species of Special Concern found in this area are: Redhead, Black Swift, Vaux's Swift, Black Tern, Burrowing Owl, American White Pelican, Wood Stork, Olive-sided Flycatcher, Vermilion Flycatcher, Purple Martin, Yellow-headed Blackbird, Yellow-breasted Chat, and the Summer Tanager.

This proposal could negatively impact the many sensitive species in the park by destroying and damaging habitat, increasing air and noise pollution, reducing habitat quality, increasing presence of invasive species, increasing disturbance, increasing predation, etc. It could therefore directly impact the above listing avian species by reducing population density, diminishing reproductive success, and reducing species diversity and richness.

Passive Recreation

We applaud State Park's recent efforts to improve public access and passive recreation at Oso Flaco Lake for community residents and visitors. However, the active recreation in terms of ATV access, campground development and trails to areas currently inaccessible will not only impact the region's biological resources, but it will also diminish the current passive recreational experiences of hiking, picnicking, bird watching, environmental education, and nature study that the area currently attracts.

Conclusion

We strongly urge State Parks to reject the two alternatives currently outlined in the PWP for Oso Flaco Lake and take into greater consideration protecting and improving habitat for rare and endangered species and improving passive public access for the community's residents and numerous visitors to the region. We believe funds would best directed towards: continued improvements to passive recreation (docents, kiosks, bathrooms, etc.) and continued improvements in the water quality entering the Lakes. Furthermore, additional dollars could be directed towards restoration of Oso Flaco Lake and invasive species control. We strongly believe this unique ecosystem would be severely degraded by the proposed plan. Other less invasive alternatives that would benefit the ecosystem and the area's residents should be considered more thoroughly. Audubon looks forward to being part of that conversation.

Sincerely,



Andrea L. Jones
Director of Bird Conservation

cc: Jay Chamberlin, California State Parks, Chief of Natural Resources
Doug Tait, Conservation Chair, Morro Coast Audubon Society
Mark Reynolds, The Nature Conservancy
Ronnie Glick, Senior Environmental Scientist

² https://sdmmp.com/upload/SDMMP_Repository/0/7htyc4z81w0qknd9fjr5pbs6v32xm.pdf