

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Thursday, April 21, 2016 1:15:27 PM  
**Importance:** High

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Keep the Guadalupe-Nipomo Dunes Beach Open!!!!

The proposed closure is unacceptable!

Jean Mollenkopf Moore  
Controller  
Access Limited Construction Company



**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Wednesday, April 20, 2016 11:04:02 AM

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To Whom It May Concern,

Please don't close these dunes as they are a prized area for us here on the central coast for visiting and hiking, as well as a draw for tourism (which the town of Guadalupe definitely needs.)

Please reconsider your plans and allow this area to remain open for people.

Thank you,

Michael Brajkovich  
Oceano, Ca.

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Tuesday, April 19, 2016 12:21:45 PM  
**Attachments:** [2016-04-19\\_0001.jpg](#)

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To Whom it May Concern:

My family and I would hate to see the Guadalupe-Nipomo Dunes close. We visit often with our children, as it is way less crowded than going further North. We have made some great memories on that stretch of beach. We would be happy to pay an entrance fee or purchase a seasonal permit to be able to continue enjoying this space (see photo attached).

Thank you,  
Maureen Soderberg

**From:** ■  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo proposed closure  
**Date:** Tuesday, April 19, 2016 10:59:46 AM

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To Whom it May Concern:

The proposed complete closure of Guadalupe-Nipomo Dunes is absolutely not acceptable. This area, once widely used recreationally by motorists, has already been limited by its closure to motor vehicle traffic. Currently, only able-bodied people have access to this public land, and much of that access self-limits to the beach nearest the existing parking area. Human impact has been greatly reduced, thereby providing more natural habitat restoration for native species.

People need places to recreate. People need access to the lands their taxes support if we expect them to appreciate the land and continue to support its preservation. Locking people out does NOT provide our children, the next generation of Earth's guardians, the access they need for an education and appreciation of nature.

Please ban from your plan any further closure of public lands.

Jennifer Best  
Creston, California



**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Tuesday, April 19, 2016 8:56:57 AM

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Keep it open

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Monday, April 18, 2016 9:26:23 PM

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Pacific Southwest Region, Refuge Planning, U.S. Fish and Wildlife Service,

I'm a Guadalupe resident and am very concerned about the possibility of the Guadalupe-Nipomo Dunes, tax payer funded, public access National Wildlife Refuge closing for fifteen years! Has there been any attempt to contact other avenues of funding within federal government channels, apart from the US Fish and Wildlife Service (USFWS)??? This refuge, in addition to being a national and state treasure, is a Santa Barbara and San Luis Obispo County treasure too! Are they aware of the funding issues??? Is there any possibility that funding source for this reserve could be turned over to California's Department of Parks and Recreation??? I personally enjoy this area not just because it's beautiful when I'm there, but I also cherish the idea that this pristine beautiful reserve is freely accessible too, without even being there! The words "shut down" or "closure", with regard to this reserve, takes away from the beauty of what this reserve represents and my wife and I would appreciate it tremendously if it would stay open! Anything you could do to keep it free and open would be awesome! Thank you for your time and consideration toward our concerns.

Mark P. Mackley and Karen L. Mackley

Guadalupe residents

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP closure!  
**Date:** Monday, April 18, 2016 6:06:50 PM

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I was shocked to learn about the possible closing of beach access to the Guad Dunes. I live in Lompoc and have been very unhappy with the limited beach access and very limited activities allowed at Surf Beach.

I tell my friends that live out of the area, that "our beach" is like... Welcome to Surf Beach, where fun is NOT allowed!

I really enjoy hiking, surf fishing and whale watching. I have been going to Guadalupe dunes for years now because of the rules at Surf Beach.

If they take away Guad from me, I will no longer want to live here.

I love living in Santa Barbara County, I would be very unhappy to move away, beach access is very important to me.

Please do not take it from me.

AL MILLIKAN / Lompoc, CA

**From:** [Ranta, Owen](#)  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP (Chevron EMC Comments)  
**Date:** Monday, April 18, 2016 4:23:52 PM  
**Attachments:** [Chevron EMC comment letter on USFWS Draft Comprehensive Plan for Guadalupe Nipomo Dunes Refuge.pdf](#)

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Attached please find comments on the Draft Comprehensive Plan for the Guadalupe-Nipomo Dunes National Wildlife Refuge.

Thank you,

**Owen Ranta**

Team Lead

**Chevron Environmental Management Company**

2184 Thornberry Road

Guadalupe, CA

Tel: (805) 343-0836

Mobile: (815) 530-6939

E-mail: [owenranta@chevron.com](mailto:owenranta@chevron.com)

*Please note the address listed above is a physical address and not a mailing address. The mailing address for this CEMC office location is PO Box 7261, Arroyo Grande, CA 93421.*



Owen Ranta  
Team Lead

**Refining Business Unit**  
Environmental Management Company  
Chevron Corporation  
2184 West Thornberry Rd  
Guadalupe, CA 93434  
PO Box 7261  
Arroyo Grande, CA 93421  
Tel (815) 530-6939  
owenranta@chevron.com

April 18, 2016

Michael Brady, Project Leader  
U.S. Fish and Wildlife Service, Refuge Planning  
2800 Cottage Way, W-1832  
Sacramento, CA 95825

**Re: Draft Comprehensive Conservation Plan for Guadalupe–Nipomo Dunes National Wildlife Refuge**

Dear Mr. Brady:

Chevron, as successor in interest to Union Oil Company of California, is responsible for the former Guadalupe Oil Field, which we refer to as the Guadalupe Restoration Project (GRP), immediately south of the Guadalupe-Nipomo Dunes National Wildlife Refuge (Refuge). We are engaged in facility decommissioning activities on the site, as well as remediation and restoration. As the neighboring land to the south of the Refuge, we would like to provide comments on the draft Comprehensive Conservation Plan (Plan). Our comments are focused on the three alternatives presented for management of the Refuge over the next 15 years.

It is our understanding that the Plan includes three alternatives: A, B, and C. The three alternatives are summarized as:

*Alternative A* – This alternative would be the “no-change” alternative in which present activities would continue with a labor commitment of just over one full-time equivalent (FTE). There would be continued efforts to control invasive plants, including European beachgrass and veldt grass; propagation of native plants; management of nesting western snowy plovers; other management activities, such as fence and sign maintenance; and public outreach.

*Alternative B* – This alternative would include a higher level of effort, amounting to an additional 1.2 FTE. In addition to the management activities described for Alternative A, this alternative would have some significant management actions, including feral pig control, possible predator management, and an increase in public outreach.

*Alternative C* – This alternative would involve complete closure of the Refuge and the discontinuation of most management and maintenance activities. The amount of work to be done would drop to 0.15 FTE and management actions such as western snowy plover nest enclosures, control of invasive plants, and management of feral pigs would not be undertaken.

As part of our ongoing activities at the former Guadalupe Oil Field, Chevron is engaged in active management of biological resources that most closely aligns with Alternative B. Currently, our resource protection and management activities include monitoring of, and surveys for nesting western snowy plovers (a federal-listed species); propagation and outplanting of federal-listed plant species (La Graciosa thistle, Surf thistle, and beach spectaclepod); monitoring of other special-status species, including the federal-listed California red-legged frog; and control of non-native invasive plants such as veldt grass and European beachgrass. Furthermore, we have participated in a feral pig control program as well as predator management activities.

Chevron is one of several Refuge neighbors to the north and south of the Refuge who are contributing efforts to protect the dune complex. For example, current programs on Vandenberg Air Force Base, the Rancho Guadalupe Dunes Preserve (managed by the Santa Barbara County Parks Department), and the Oceano Dunes State Recreation Area (managed by the California Department of Parks and Recreation) support protection of western snowy plover, including predator management and monitoring of nesting birds. Invasive plant species removal is conducted on these three areas as well. Baseline and post-project monitoring for the red-legged frog is conducted on Vandenberg Air Force Base.

Chevron has concerns regarding Alternative C and the potential for associated effects on the conservation efforts previously described. We are particularly concerned about the efforts and expense put forth by Chevron to control invasive plant species, particularly European beachgrass and veldt grass. Without management in the Refuge, which is upwind of the GRP, these two species are likely to spread throughout the Refuge and also into the GRP by means of seed blown by prevailing winds from the north and northwest. Much of the successful removal of these species, as well as the restoration of native vegetation on GRP could be undone by implementation of Alternative C. These species could continue to spread beyond GRP into other portions of the dune complex as well, resulting in increased management costs at the county and state levels.

The lack of management that is part of Alternative C could have detrimental effects on actions taken previously on the Refuge. The Refuge created two new freshwater wetland ponds in the past several years that could potentially provide a critical connection between the wetlands on the GRP and other freshwater wetlands to the north. The connection would be important as a corridor for movement and dispersal of native plants and wildlife, as well as for exchange of genetic material. The maintenance of corridors is crucial in natural landscapes that are of limited extent, such as the dune complex. Without management, these wetlands could become overrun by European beachgrass or by native species that may need to be managed at times, such as cattails.

We recommend Alternative B as the better choice for dune-wide conservation and to support the mission of the National Wildlife Refuge System, especially to support the conservation of natural resources for present and future generations. The addition of feral pig control as part of Alternative B would be of great benefit to the dune complex and local farmers. Feral pigs can be difficult to control once they establish in an area and they cause damage to a variety of natural resources from wetland areas to rare and endangered plants to ground-nesting birds. Without management, the Refuge could become a source area from which this non-native species could spread to other portions of the dune complex. Detrimental effects to native and restored habitats, as well as to common and special-status plants throughout the dune complex would go hand-in-hand with the establishment of a larger feral pig population.

Thank you for the opportunity to comment on the draft Comprehensive Conservation Plan for the Nipomo-Guadalupe Dunes National Wildlife Refuge. We believe Alternative B to be the preferable alternative because of its positive effects on the natural resources of the Refuge, and the rest of the dune complex. Those positive effects would support the intensive, long-term management and restoration efforts of Chevron at the GRP. Conversely, the implementation of Alternative C appears to have the potential for detrimental effects to occur to common and special-status natural resources throughout the dune complex, including the Refuge and the neighboring dune complex. Chevron believes that the managers of the dune complex must strive to achieve a common goal for the control of invasive plant species and feral pigs, as well as the management of western snowy plover nest predators. We understand that this is a critical current issue and support USFWS's prudent efforts to define their long-term future management plan for the Refuge in a manner that is balanced with a sustainable and appropriate level of

resource expenditures and commitment. If even one of the managers chooses not to participate in these efforts, then the programs proposed or underway at the other properties that make up the dune complex are severely compromised and become ineffective.

Sincerely,

A handwritten signature in black ink that reads "Owen Ranta". The signature is written in a cursive, flowing style.

Owen Ranta – Team Lead  
Former Guadalupe Oil Field  
Chevron Environmental Management Company

cc: Randy Jewett, Chevron EMC  
Juliet Don, Chevron PGPA  
GRP Compliance File  
Ryan Zukor, Padre Associates, Inc.

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Monday, April 18, 2016 3:37:03 PM

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The dunes must stay open

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Monday, April 18, 2016 3:32:19 PM

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Keep Guadalupe Dunes OPEN

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Monday, April 18, 2016 8:14:55 AM

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Please don't close down our dunes!!! I've been going there since I was a little girl! It is a place I go to think and relax and destress... I have severe anxiety disorder and when I'm there I hardly ever feel the effects of my anxiety... Shutting them down would be detrimental to my emotional and mental health.

-Ashley

**From:** [REDACTED]  
**To:** [Refuge Planning Comments, FW8](#)  
**Subject:** Guadalupe-Nipomo Dunes National Wildlife Refuge  
**Date:** Monday, April 18, 2016 8:02:51 AM

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Refuge Planner:

I attending the meeting held March 2016 in Grover Beach, CA to hear and learn about the Guadalupe-Nipomo Dunes National Wildlife Refuge. Options were presented that evening and I would like to make the following comments:

Alternative C: "Minimal wildlife and habitat management and Refuge is closed to the public" should not be considered as an option. To not manage the refuge is the same as abandonment which creates a place for many things to go wrong. Invasive and exotic plants will continue to invade at rapid speed and the destructive feral hog population will grow. Also, these things don't stop at your property lines but continue onto neighboring properties including State Parks and Beaches and the Chevron property to the south. In addition, closing the Refuge to the public removes opportunities for all of us to learn about and help this special place. Alternative C is a reckless choice.

I feel that Alternative B "Moderate increases in wildlife and habitat management, an incremental increase in services and environmental education" is a reasonable and positive approach to meeting Refuge goals.

I would like to ask that future public meetings regarding the Refuge be publicized in local media. I think the TV stations and local print media would carry this subject as a news story and many more people would attend. Also, the California Native American Heritage Commission in Sacramento can provide you with addresses of tribal people and groups who have an interest in the success of the Refuge.

My final comment concerns cultural resources that are present at the Refuge. These sites are important to us and to all people. They are a part of the deep history of this place and they must be protected as they are fragile and cannot be replaced.

Thank you,

Mona Olivas Tucker, Chairwoman  
yak tit<sup>y</sup>u tit<sup>y</sup>u - Northern Chumash Tribe

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Sunday, April 17, 2016 7:13:57 PM

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Refuge Planning,

Thank you for the opportunity to comment on the Draft Comprehensive Conservation Plan for the Guadalupe-Nipomo Dune National Wildlife Refuge (Refuge). As a local resident and nature enthusiast, I have had the great pleasure of accessing the Refuge during docent led hikes and volunteer planting days. I have observed the rich diversity of flora and fauna that inhabit the Refuge. I have also observed the extensive threat that exotic species pose to that unique diversity.

If Alternative C is adopted, the USFWS would be in conflict with the purpose for which the Refuge was established, "to conserve imperiled plant and wildlife habitats and species (USFWS, 2016)." The land management proposals outlined in Alternative C lack adequate measures for controlling invasive exotic species of plants and wildlife (feral hogs). Alternative C would allow the two most prominent and invasive exotic plant species on the Refuge, European beach grass and veldt grass to continue to invade the dune system, altering the deposition of sand and dynamic nature of the dune system to which the endemic plant species have been adapted. Without aggressive weed control efforts, these species not only threaten the habitat within the Refuge, but also the Guadalupe Restoration Project that is located directly south and downwind of the Refuge. The successful weed management efforts of the Guadalupe Restoration Project will be undone if the Refuge does not do its part to control invasive exotic species.

I believe that the Refuge has far greater potential to build partnerships with local land managers, non-profit organizations, and educational institutions to fulfill the mission of the Refuge System, if Alternative B is enacted. Alternative B will benefit not only the Refuge, but also the neighboring properties and wildlife that disperse between them.

Sincerely,

Anonymous, Orcutt Resident

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Sunday, April 17, 2016 2:41:38 AM

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Are you kidding me !!! This beach is one of the most treasured recreational and family gatherings EVER. Make your refuge somewhere else and figure out something different. This will not happen without a major protest and lawsuits that will come your way at your expense. Seriously re-consider this crazy idea and whoever is behind needs to answer to every citizen that LOVES and visits this beach.

Incredible how some people come up with ideas to ruin lives just because their bored!!!

Not Sincerely,

Raised in the beautiful City of Guadalupe

Barbara Adams :)

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Saturday, April 16, 2016 10:12:23 PM

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To whom it may concern,

Please don't close access to this beautiful beach! It has been a place of inspiration, peace, and family bonding for me for over 25 years! My parents took me and my friends hiking there as kids and I have taken my own kids there to play and admire God's awesome handiwork. If this beach closed it would be an extremely sad thing.

Yukara Monroe

"The remarkable thing about God is that, when you fear God, you fear nothing else, whereas if you do not fear God, you fear everything else. "

Oswald Chambers

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Saturday, April 16, 2016 11:54:05 AM

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Andres Gutierrez  
[REDACTED]

U.S.F.W.S.

RE: CLOSURE OF GUADALUPE BEACH

Sir or Ma'am

I, as so many in Santa Maria Valley were informed by the Sun, that you are planning to close Guadalupe Beach for 15 years. The closure will have a serious impact to our city of Guadalupe's economy. In our city where even quarters of a dollar makes a difference for some of our local businesses to be in the black and not the red. You need to understand how devastating this could be.

I would like to request that the citizens of Santa Maria Valley have a chance to respond to this issue. To be able to suggest that by the 18th of April after being informed on the 14th of April is ample time is unjust.

Has anyone approached your agency suggesting a volunteer group made up of local people to keep it open from Friday to Monday? They can keep it clean and show a presence. They can be taught by docents and park personnel things to do and don't do.

All I am asking for is some time to help come up with an alternatido.plan rather than a closure for 15 years.

I would like to thank you ahead of time for your willingness to help give Guadalupe a chance.

Respectfully  
Andres Gutierrez  
USA/SFC(Ret)

[Sent from Yahoo Mail on Android](#)

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Saturday, April 16, 2016 10:24:08 AM

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Please do NOT let this happen.

My name is Ferrarah Dizayee. I haven't always lived on the Central Coast but it has always been in my heart. In all my 28 years, WITHOUT question, this is the worst decision I have ever seen be considered . I will never support the close of this beautiful beach.

Most of it is already closed to conserve wildlife anyways which I DO support and have a great respect for. However, FULLY closed? I'm not sure what pushing out tourists, surfers, youth, and more will do for our economy but I know it will be really sad for the souls involved and their well-being. With an uprising in crime in this area, I worry about the effects here.

The youth that reside here. Well lately I, they do not always have the best influence it seems. I have sisters that are young, and they are very good girls, however their peers who aren't as lucky to have good influences are more so inclined to taking the wrong path, than they used to be. Would you push them to join gangs intentionally? So tell me why we feel it's okay to put wildlife so far ahead of the actual human beings that live here, the aspiring Oceanographers, the surfers, the youth that are our future, when you can respect both, without closing the beach??

I hope you can see where I'm coming from here. The few good things that provide healthy activity in this area, we need to hold on to. If we don't, we may as well consider ourselves part of the problem.

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Saturday, April 16, 2016 10:05:22 AM

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I am writing in response to an article I read about closing our reserve for 15 years! I feel this would destroy our local economy. Guadalupe is recovering from a recession, and is starting to show signs of life. New homes are being built, events are happening, businesses are opening. Having an accessible beach nearby is a huge draw, and taking it away would be the worst thing you could do. It would ensure the death of Guadalupe. For God's sake this is California! We are a beach community! The Dunes Center regularly hosts events that highlight the wildlife and beauty of the dunes, and generate revenue. Surely we can brainstorm ways to generate more. Fundraisers work well. Please reconsider any decision to close this area to the public!

Respectfully,

Shari Doty

PS Please also consider all of the homeowners who bought in this area because of its locality to the beach.

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** "GND CCP"  
**Date:** Friday, April 15, 2016 11:05:19 PM  
**Attachments:** [MCAS Guadalupe Dunes Plan.doc](#)

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U.S. Fish & Wildlife Service,

Attached is the comment letter from Morro Coast Audubon Society.  
Thank you for the opportunity to comment on the Guadalupe-Nipomo Dunes NWR Draft Plan.

Doug Tait  
Conservation Chair, Morro Coast Audubon Society

April 15, 2016

U.S. Department of the Interior  
Fish & Wildlife Service  
Pacific Southwest Region  
2800 Cottage Way  
Sacramento, CA 95825



**Re: Guadalupe-Nipomo Dunes NWR Draft Comprehensive Conservation Plan**

Morro Coast Audubon Society, MCAS, appreciates this opportunity to comment on the Draft Comprehensive Conservation Plan for the Guadalupe-Nipomo Dunes NWR.

The MCAS preference for the listed management alternatives presented in the Draft Comprehensive Plan is clearly Alternative “B”. Alternative “B” aligns well with the MCAS Mission Statement – to promote the appreciation, conservation, and restoration of ecosystems focusing on the biological diversity of birds, other wildlife, and their habitats.

MCAS believes the additional wildlife management activities of Alternative “B”, which include improving western snowy plover hatch rate by reducing invasive weeds and predation; implementation of a feral swine control and monitoring plan to protect the snowy plover, California least tern, red-legged frog, La Graciosa thistle, and other listed and sensitive species; and research on climate change effects on listed species to determine adaptive and mitigating plans is commendable.

We also believe the additional outreach and education to reduce human disturbance on the sensitivity of breeding birds and listed plants, which is included in Alternative “B”, is a necessary and worthy goal.

In conclusion, the reason the Guadalupe-Nipomo Dunes NWR was created – to conserve Central California coastal dune and associated wetland habitats and support the recovery of sensitive native plants and animals – aligns naturally with Alternative “B”.

Sincerely,

Douglas Tait  
Conservation Chair, Morro Coast Audubon

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Friday, April 15, 2016 10:25:46 PM

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Hi, I'm a Guadalupe native, lived here all my life and use our beach every chance I get, I disagree with the closure and believe it's all of our beach and that no government has any right to close it to the people, especially if it's ours to begin with. Hope this will be considered as part of the move not to have any closure to our beach. Thank you for your time

Sent from Raymond

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Friday, April 15, 2016 10:05:57 PM

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It always amazes me how a couple of environmentalists can overrule hundreds of nature loving beach goers when it comes to a vote on such a huge issue. The massive closures already in effect protecting the snowy plover is working just fine. Guadalupe beach is a long beautiful stretch of beach that is NOT crowded with hundreds of people hence the reason people go there.

The closure makes no sense whatsoever.

The complaint that exists of the off-roaders in the Oceano dunes causing dust is an absolute joke. As we've witnessed these past few days with 30 mph winds is what fills the air with sand and dust over Santa Maria. Unless it's Diablo or military coastline we the public should have access to public coastlines. There is no single human causing any harm to the so called endangered species. Fox, coyotes and Mountain lions are the natural cause of any disappearance of such species including ducks, mud hens, gulls, ect. Government has WAY too much control and I believe this closure idea is a huge infringement and embarrassment to the locals, tourists and to California itself.

Sent from my iPhone

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Friday, April 15, 2016 8:44:10 PM

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I have moved to the area recently and discovered the Guadalupe Nipomo dunes area. I was stunned by the beauty and enjoyed the proximity of a beach next to Santa Maria.....Please do not close it. If necessary, why not charge \$2-3\$ to help maintain it? This beach is a place where I go after work to relax from the day, since it's close for me. I'm sure it's the case for many people around here. Also I bring my visitors there every time.

Sandy Berger

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Washington DC's Largest FREE Email service. ---> <http://www.DCemail.com> ---> A Washington Online Community Member ---> <http://www.DCpages.com>

**From:** [Jon Hall](#)  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Cc:** [Michael Brady](#)  
**Subject:** GND CCP Land Conservancy SLO Comments  
**Date:** Friday, April 15, 2016 5:08:26 PM  
**Attachments:** [Comments\\_GND CCP 2016.pdf](#)

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Hello,

Attached are the Land Conservancy of San Luis Obispo County's comments on the Draft CCP for the Guadalupe-Nipomo Dunes National Wildlife Refuge. Thank you for allowing us the opportunity to comment on this historic document!

If you have any questions regarding our comments, please don't hesitate to contact me.

-Jon

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**Jon Hall**  
*Restoration Manager*

**THE LAND CONSERVANCY OF SLO COUNTY**

1137 Pacific Street | San Luis Obispo | CA 93401  
(805) 544-9096 x19 [www.LCSLO.org](http://www.LCSLO.org)  
Conserving the **Heart & Soil** of SLO County!

Land Trust Accreditation Commission Accredited

# The Land Conservancy

OF SAN LUIS OBISPO COUNTY

P.O. Box 12206 • SLO, CA 93406 • (805) 544-9096 • FAX (805) 544-5122  
VISIT US ONLINE AT: WWW.LCSLO.ORG

May 30, 2014

RE: Guadalupe-Nipomo Dunes CCP/EA Comments

To US Fish and Wildlife Service Representatives,

This letter documents formal comments by the Land Conservancy of San Luis Obispo County (Land Conservancy) on the Draft Comprehensive Conservation Plan and Environmental Assessment for the Guadalupe-Nipomo Dunes National Wildlife Refuge (GNDNWR). The Land Conservancy has been working in the Guadalupe-Nipomo Dunes Complex since 1999. During that time we have seen a considerable increase in the extent of invasive plants on the GNDNWR. This not only affects the Refuge itself, but impacts the management goals of neighboring landowners. The current situation has developed under Alternative A, the “Business as Usual” approach. Alternative C, which recommends reducing the current level of effort, seems unacceptable for the long-term sustainability of the dune ecosystem. It is for these reasons that the Land Conservancy **strongly recommends US Fish and Wildlife Service adopt Alternative B**, which promotes a moderate increase in wildlife and habitat management, and an incremental increase in visitor services and environmental education.

Specific comments on the plan itself include:

1. Refuge Goal 2 (pg. 84) reflects Fish and Wildlife Service’s commitment to moving past single species management to manage for diversity as well. It is generally accepted that a changing climate (i.e. increased droughts and reduction in fog layer) will have significant impacts on species ranges. Although the studies cited in this plan indicate that no changes are expected to plant communities, it could be argued that we are already seeing changes to our local ecosystems and native species migrations are currently being documented along the California Coast. Under future novel climates, it is possible that the species composition across the landscape will be different from what we see today. If Goal 2 was expanded to “preserve and promote biodiversity”, it would allow the plan more flexibility to adapt to changing climates. This would also maintain consistency with goals for the entire Dunes Complex currently being drafted by the Dunes Collaborative.
2. Objective 2.4 (pg. 97) calls for a baseline understanding of the bird, mammal, herpetological, and plant communities on the Refuge. There exists a large data gap in our understanding of invertebrate fauna and biological soil crusts in the dunes. We would recommend that attention also be given to increasing our understanding of these two groups.
3. Under Goal 2, objectives focus on invasive species control work in the RPMAs. In addition to working in the RPMAs themselves, we recommend creating defensible spaces around these areas to reduce reinvasion by surrounding non-native plant infestations. We also recommend a Refuge wide weed management approach that prioritizes RPMAs but does not exclude work in other areas. To effectively work with neighboring landowners on invasive plant priorities, it may be necessary to have the flexibility to treat satellite populations of a widespread weed invading new areas of the Refuge or in dealing with new invaders discovered in the Early Detection and Rapid Response Program.

Local People. Local Land.

# *The Land Conservancy* OF SAN LUIS OBISPO COUNTY

P.O. Box 12206 • SLO, CA 93406 • (805) 544-9096 • FAX (805) 544-5122  
VISIT US ONLINE AT: WWW.LCSLO.ORG

4. The Land Conservancy supports Objective 2.7 (pg. 99), creation of an invasive species Early Detection and Rapid Response Program. We recommend that this be applied to all invasive species and not just plants. Invasive animals and insects can pose the same level of risk to the ecosystem as invasive plants.

Thank you for allowing us to comment on this new Comprehensive Plan for managing the GNDWR. This Refuge truly is a special and spiritual place for many people. We would like to thank the US Fish and Wildlife Service for stewarding such an incredible resource.

Sincerely,



Kaila A Dettman  
Executive Director  
(805) 544-9096 Ext. 13  
[kailad@lcslo.org](mailto:kailad@lcslo.org)

**Local People. Local Land.**

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Friday, April 15, 2016 12:03:28 PM

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PLEASE DON'T CLOSE THE DUNES TO THE PUBLIC!!!

I'm sorry if funding has been cut to have a local manager, but closing the dunes will be a devastating loss to our community. My children love their school field trips to the dunes and learn so much from the activity and docents who volunteer their time for nature preservation there. Our family loves the beach and this is the closest one and would be hugely missed if it were closed. I understand that there are some supposedly endangered species indigenous to the area, but the snowy plover have other protected areas and the red-legged frog really isn't worth the trouble. Please consider the communities and people that will be affected by this action.

Sincerely,  
Teresa Gardner

[REDACTED]

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Friday, April 15, 2016 10:43:44 AM

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Good morning,

As a native who grew up in Guadalupe, hearing the prospective closure to the beaches and refuge land is a disheartening sound. I currently live in Riverside County and the highlight to my home visits are visiting/hiking with my family off Guadalupe beach. Growing up in Guadalupe we become accustomed to neighboring areas luring local business, tourism, establishments, financial routes, and honestly life lines away from our small agricultural beach town. The few constants we have are our close knit family values, the fog, and our beach. We truly hold it near and dear to our hearts and it has become a safe haven to vent, calm our minds, and raise our families. I truly hope we can find some effective ways to keep our beaches open to the populous which will not only allow a safe haven for the flora/fauna but for the residents as well. I know if we had more knowledge, information, and access to routes to help and or aide in efforts to keep it open the locals would love to be apart of it. The beach is the vein to what keeps our town pumping. As a child, teen, young adolescent, and now young man who is gearing toward starting a family of my own in the future the idea of not being able to keep the traditions which were taught to me in the sand and in the water would be a travesty.

Thank you for your time and continual preservation of our land, life, and home.

-Justin A. Paduganan

**From:** [NPS\\_Environ\\_Rev@NoReply.nps.gov](mailto:NPS_Environ_Rev@NoReply.nps.gov)  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Cc:** [alan\\_schmierer@nps.gov](mailto:alan_schmierer@nps.gov); [samuel\\_fox@nps.gov](mailto:samuel_fox@nps.gov)  
**Subject:** GND CCP: National Park Service Comments, Guadalupe-Nipomo Dunes National Wildlife Refuge Draft Comprehensive Conservation Plan  
**Date:** Friday, April 15, 2016 9:16:47 AM  
**Attachments:** [attachment.zip](#)

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Dear Sir/Madam,

Attached please find National Park Service comments on the Guadalupe-Nipomo Dunes National Wildlife Refuge Draft Comprehensive Conservation Plan.

If you have questions, please contact Alan Schmierer at [Alan\\_Schmierer@nps.gov](mailto:Alan_Schmierer@nps.gov).

**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** Guadalupe-Nipomo Dunes CCP  
**Date:** Thursday, April 14, 2016 7:19:49 PM

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As a 3rd generation Guadalupe resident the idea of closing Guadalupe beach is an outrage it would mean the loss of our heritage. My children deserve to have that piece of Guadalupe life. Also Guadalupe beach is one of the last raw natural beaches we have to enjoy taking that away from the residents and visitors of this area should be a crime.

Megan J Lizalde  
[REDACTED]

Sent from my Verizon Wireless 4G LTE smartphone

**From:** [karen\\_washington@nps.gov](mailto:karen_washington@nps.gov) on behalf of [PWR Regional Director, NPS](#)  
**To:** [FW8 Refuge Planning Comments](#)  
**Cc:** [Laurette Jenkins](#); [Naomi Torres](#); [Alan Schmierer](#)  
**Subject:** ER 16\0017 – Draft Comprehensive Conservation Plan and Environmental Assessment  
**Date:** Thursday, April 14, 2016 11:44:27 AM  
**Attachments:** [CA.NIDU.07.09.14 \(1\).doc](#)

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OFFICIAL CORRESPONDENCE BY ELECTRONIC MAIL

NO HARD COPY TO FOLLOW

DEPARTMENT OF THE INTERIOR

NATIONAL PARK SERVICE

Pacific West Regional Office

333 Bush Street, Suite 500

San Francisco, California, 94104-2828

L7619 (PWR-P)

April 13, 2016

GND CCP Refuge Planner

Pacific Southwest Region

U.S. Fish and Wildlife Service

2800 Cottage Way, W-1832

Sacramento, CA 95825

[fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)

Re: ER 16\0017 – Draft Comprehensive Conservation Plan and Environmental Assessment

To whom it may concern:

The National Park Service (NPS) appreciates the opportunity to review the Guadalupe-Nipomo Dunes National Wildlife Refuge (Refuge) Draft Comprehensive Conservation Plan (DCCP). Notably, alignments of the Juan Bautista de Anza National Historic Trail are located in the vicinity of the Refuge, and the Nipomo Dunes-Point Sal Coastal Area National Natural Landmark (NNL) is located within the Refuge.

In addition to supporting the current management alternative included in the DCCP, the NPS supports Alternative B: *Moderate increase in wildlife and habitat management, and an incremental increase in visitor services and environmental education.*

Our specific comments are as follows:

#### National Natural Landmark

The proposed DCCP (page 10) accurately represents the significance of the Nipomo Dunes-Point Sal Coastal Area National Natural Landmark with the following statement:

*At 20,000 acres, the Dunes Complex is one of the largest dune landscapes on the west coast of North America. In 1974, the lands now included within the boundaries of the Refuge, as well as several neighboring Dunes Complex lands, were collectively incorporated by the Secretary of the Interior into the 11,533-acre Nipomo Dunes-Point Sal Coastal Area National Natural Landmark. This action recognizes the Nipomo Dunes as the most extensive coastal dune tract in California. The National Natural Landmarks Program, established in 1962 by the Secretary of the Interior under the authority of the Historic Sites Act of 1935 (16 U.S.C. 461 et seq.), encourages the preservation of the best remaining examples of major biotic communities and geologic features composing the Nation's natural landscape and identifies and recognizes areas in both public and private ownership.*

Overall, the NPS's NNL Program recognizes and advocates for the conservation of sites that best illustrate the nation's biological and geological history. NNLs are owned by a variety of public and private land stewards, and participation in the program is voluntary. Landmark sites are designated for their outstanding condition, illustrative character, rarity, diversity, and value to science and education. To-date, nearly 600 natural areas, in both rural and urban

communities, have received an NNL designation.

The NPS periodically performs on-site assessments of NNLs, in order to document current conditions and monitor trends. The annual National Natural Landmark Status Report lists the site as "Damaged with Improving Conditions." This is an improvement upon a long-term chronic condition (past status was "Damaged and Threatened"). Our last on-site visit was conducted in July, 2014. Our staff met with Glenn M. Greenwald, Refuge Manager, Guadalupe-Nipomo National Wildlife Refuge (NWR). The reported damage is being caused by multiple external sources including agricultural practices, mining, visitor use, and contamination (refer to attached site report, page 7). We are pleased with the positive trends in condition at this site, and very much appreciate the excellent collaborations we have had with Refuge staff.

We recommend adding "NNL" to the EA Glossary of Terms and Acronyms, as follows:

*NNL - A natural area designated by the Secretary of the Interior as being of national significance to the United States because it is an outstanding example of a biological and/or geological feature.*

#### National Historic Trail

The area of potential effect examined in the DCCP is located near the Juan Bautista de Anza National Historic Trail (Anza NHT) historic corridor, and is adjacent to and contains portions of the Anza recreation retrace route (recreation trail), co-named California Coastal Trail. The areas protected in the Refuge offer high-quality recreation opportunities for Anza NHT visitors to experience landscape settings similar to that which the Anza expedition party encountered while they travelled along the central California coast.

The Anza NHT appreciates and commends the USFWS for continuing to provide in a sensitive manner these recreation opportunities in high quality natural areas that are otherwise limited outside the project area along the 1,200 mile Anza Trail historic corridor and associated recreation trail.

The Anza NHT supports further development of recreation opportunities as appropriate for the stewardship of natural resources within the Refuge that the USFWS protects.

For questions regarding these comments or to receive additional information about the NNL

Program or the Anza NHT, please contact Laurie Lee Jenkins, Pacific West Regional NNL Coordinator, (360) 854-7206 or [laurie\\_lee\\_jenkins@nps.gov](mailto:laurie_lee_jenkins@nps.gov) or BriAnna Weldon, Outdoor Recreation Planner, Juan Bautista de Anza National Historic Trail, (415) 623.2343 or [brianna\\_weldon@nps.gov](mailto:brianna_weldon@nps.gov).

Sincerely,

/s/ Stephanie Burkhart

(signed original on file)

(for)

Laura E. Joss

Regional Director

Pacific West Region

Attachment: 1

cc:

NNL-LLJenkins

JUBA-NTorres



NATIONAL NATURAL LANDMARK STATUS REPORT  
Part I. Administrative Information

Site: Nipomo Dunes - Point Sal Coastal Area  
Part II Attached? Yes No. of Part II Sheets? One

State(s): California  
Date of Report: July 8, 2014

**1. REPORTING OFFICIAL:**

Name: Stephen T. Gibbons  
Title: NNL Coordinator – Pacific West Region  
Owner: \_\_\_\_\_ Manager: \_\_\_\_\_ Patron: \_\_\_\_\_ NPS: X  
Address: 810 State Route 20  
City/State/Zip: Sedro Woolley, WA 98284  
Phone: 360-854-7203  
E-mail: [Steve.gibbons@nps.gov](mailto:Steve.gibbons@nps.gov)

Information on this report was obtained through:  
 Field inspection by person # 1, 2 & 3  
 Telephone contact with person #  
 Written communication from person #  
 Article or report by person #  
 Other: \_\_\_\_\_

**2. OTHER KNOWLEDGEABLE PERSON:**

Name: Brent Marshall  
Title: District Superintendent – Oceano Dunes SVRA  
Owner: \_\_\_\_\_ Manager: X Patron: \_\_\_\_\_ NPS: \_\_\_\_\_  
Address: 340 James Way, Suite 270  
City/State/Zip: Pismo Beach, CA 93449  
Phone: 805-773-7178  
E-mail: [Brent.marshall@parks.ca.gov](mailto:Brent.marshall@parks.ca.gov)

The person listed to the left:  
 Performed the field inspection  
 Accompanied us during the field inspection  
 Provided information in on-site meeting  
 Provided information by telephone/letter  
 Authored the attached article/report  
 Other: \_\_\_\_\_

**3. OTHER KNOWLEDGEABLE PERSON:**

Name: Glenn M. Greenwald  
Title: Refuge Manager – Guadalupe-Nipomo Dunes NWR  
Owner: \_\_\_\_\_ Manager: X Patron: \_\_\_\_\_ NPS: \_\_\_\_\_  
Address: P.O. Box 9  
City/State/Zip: Guadalupe, CA 93434  
Phone: (805) 343-9151  
E-mail: [Glenn.greenwald@fws.gov](mailto:Glenn.greenwald@fws.gov)

The person listed to the left:  
 Performed the field inspection  
 Accompanied us during the field inspection  
 Provided information in on-site meeting  
 Provided information by telephone/letter  
 Authored the attached article/report  
 Other: \_\_\_\_\_

Field inspection performed on: July 8, 2014  
Extent of site inspected was approximately: 10 %, or \_\_\_\_\_

by  foot  auto  air:  
acres/hectare \_\_\_\_\_  
s \_\_\_\_\_

**4. OTHER KNOWLEDGEABLE PERSON:**

Melissa Kelly, Assistant Naturalist  
Rancho Guadalupe Dunes Preserve  
6350 West Main Street  
Guadalupe, CA 93434  
Cell: (805) 729-8461  
[mkelly@sbccsd.org](mailto:mkelly@sbccsd.org)  
[www.sbccsd.org](http://www.sbccsd.org)

**5. OTHER KNOWLEDGEABLE PERSON:**

Martin Villescas, Park Ranger III  
Santa Barbara County Parks  
300 Goodwin Road  
Santa Maria, CA 93455  
(805) 934-6148  
[mvilles@co.santa-barbara.ca.us](mailto:mvilles@co.santa-barbara.ca.us)  
[www.countyofsb.org/parks](http://www.countyofsb.org/parks)

## **COMMENTS:**

On the morning of July 8, 2014 Gibbons met with Oceano Dunes State Vehicle Recreation Area (SVRA) District Superintendent, Brent Marshall. As Marshall explained, he initially became acting district superintendent upon the retirement of former district superintendent, Andy Zilke, a few years ago. After acting for a number of months, Marshall was subsequently selected as the permanent district superintendent. His predecessor, Andy Zilke, had been Gibbons' California State Parks contact at that previous time.

After meeting at district headquarters in Pismo Beach, Gibbons and Marshall began their site visit of Nipomo Dunes – Point Sal Coastal Area NNL by touring the North Beach Campground which is part of “Pismo State Beach” and the most northern portion of the NNL. According to Marshall, the campground provides approximately 88 sites to park guests while at the same time providing visitors with ready access to the beach. It is also, here, at the campground where CA state parks offer a Monarch butterfly grove (e.g., garden) for visitors to gain a better appreciation of nature's Lepidoptera biota.

From the North Beach Campground Gibbons and Marshall proceeded to enter the main beach area by the Oceano Campground, just off of Pier Avenue. It was here, along the coastal strip, that Marshall introduced Gibbons to the “Oceano Dunes Junior Lifeguard Program.” As Marshall explained, the “guard” program is to provide quality water safety education. In addition the program is designed to improve young people's physical conditioning, their understanding and respect for the environment, along with mutual respect for themselves, their peers, and their parents. The program is in its second summer and by all accounts has been a great addition to the program venues at Pismo State Beach. Ranger Marshall noted that attendance in the program has blossomed from 14 participants in 2013 up to 28 in 2014; some young “guards” are returnees.

From here the pair proceeded to drive further south, past the Pismo Dunes Natural Preserve and into the main 3,600-acre State Vehicle Recreation Area (SVRA). It is here that Gibbons viewed a number of closed areas (i.e., fenced-areas) that protect both the federally threatened Western snowy plover and the federally endangered California least tern. According to Brent Marshall, during the nesting season (e.g., March 1st – September 30<sup>th</sup>) approximately 260 acres of the park's camping and recreation area, and an additional 70 acres in the non-OHV area of Oso Flaco, are closed to protect these two federally listed species. He mentioned that this year's fledgling rate appears not quite as good as 2013's fledgling rate of 1.9; is due primarily to coyote depredation.

As far as threats, Ranger Marshall pointed out the usual culprit, exotic plants, and specifically cited European beach grass and veldt grass as two of the many alien species of concern. However, his second perceived threat to the integrity of the landmark proved interesting, thought-provocative, and put a different spin on how one perceives threats to resource integrity. His threat of utmost concern and a source of ongoing frustration is the local Air Pollution Control Board. According to Marshall, State Parks has been sued previously in derogation of set air pollution standards due to fugitive dust (i.e., sand particles) impairment caused by off-highway vehicles (OHV). As a result, each season state parks install 15-acres of “sand fence” in an attempt to reduce fugitive dust and to meet air pollution control board standards. Fueled by a local and quite vocal anti-SVRA faction, Marshall contends that if the Oceano Dunes SVRA were to be abolished that it would result in an increase of exotic plants as well as an increase in depredation on most notable

species like the Western snowy plover and California least tern.

In the afternoon Gibbons met with Mr. Glenn Greenwald, Refuge Manager at Guadalupe-Nipomo Dunes National Wildlife Refuge. Unfortunately, in his battle against leukemia Greenwald had a chemo treatment earlier in the morning and did not have the stamina to take his Polaris vehicle out onto the refuge. The 2,553-acre refuge is located in the heart of the NNL. It is here where Greenwald has created two ponds as part of the "Wildlife Ponds Project", an effort to provide high quality, long-term habitat for the federally threatened California red-legged frog and three federally endangered plants: marsh sandwort, Gambell's watercress and La Graciosa thistle.

The first site, now known as Colorado Pond, is about two and a half miles inland from the ocean; the second site, now known as Myrtle Pond, is approximately three hundred yards inland. Each pond covers about 6,000 square feet, with an average depth of about four feet. According to Greenwald, within only one day of final construction, mule deer and coyote tracks were found along the water's edge of both ponds. Within a few days, the immediate area around the ponds experienced the chorus of dozens of Sierran tree frogs. Within two weeks, northern raccoon, red-tailed hawk, great blue heron, mallard, mourning dove, red-winged blackbird, hooded oriole and other wildlife species were either observed or detected by their tracks in and around the two ponds. Overall, within ten weeks of construction California toads were observed resulting in several thousand toadlets at Myrtle Pond; and thousands of Sierran tree tadpoles and froglets were observed at Colorado Pond. Though the vegetation at both ponds remained light, in August 2013 a cadre of biologists from neighboring refuges, CA State Parks, and California Polytechnic State University San Luis Obispo planted propagules of marsh sandwort and Gambell's watercress at both ponds. The plan is to add La Graciosa thistle seeds and seed heads to the mix with the hope that these three endangered plant species will take to their new surroundings as fast as the frogs and toads have adapted. Needless to say, Greenwald's tenacity and enthusiasm to restore these species and their habitats to Nipomo Dunes – Point Sal Coastal Area NNL are to be exulted not only for the landmark but for the greater U.S. Fish and Wildlife Service.

Instead of getting to see this restoration handiwork up close, Gibbons and Greenwald drove out to the Rancho Guadalupe Dunes Preserve, a Santa Barbara county park. Part of the much larger Nipomo Dunes – Point Sal Coastal Area NNL, the preserve comprises 600-acres and features 550 foot high dunes which are the tallest on the west coast of California. Similar to Oceano Dunes SVRA and the Guadalupe-Nipomo Dunes National Wildlife Refuge, Rancho Guadalupe Dunes preserve harbors similar biological diversity reflected by its dune ecosystem and nesting habitat of the Western snowy plover and California least tern among other avian fauna. It also embodies the Santa Maria River Estuary which is an important stop-over for migrating and wintering shorebirds.

While at the main beach parking lot Gibbons and Greenwald did meet with Tina and Damen, seasonal rangers for Santa Barbara County Parks. Both rangers appeared very passionate about their jobs in protecting the inherent natural and cultural resources of the preserve. Along these lines they mentioned that exotic plants pose a constant threat to the integrity of the NNL. These include veldt grass, European beach grass, and ice plant to name just a few. Though pulling exotics is the prescribed method for ice plant, they emphasized that timing of such efforts is just as important. As they pointed out to Gibbons, traversing through and pulling protocols within the dunes should only be conducted outside the plover and least tern breeding season of March 1 – September 30 each year. Another unforeseen threat to the preserve is the ongoing practice of road sweeping which involves a grader and bucket. Accordingly, the grader scoops up the road sand

with its bucket but invariably pick up asphalt particles too. The SOP then calls for dumping the sand adjacent to the parking lot and main park road. As a result, large adjacent sections of pristine dune areas are being marred with a veneer of asphalt cinders (see attached photos).

Before departing Rancho Guadalupe Dunes Park, Gibbons mentioned to Tina, Damen and Glenn Greenwald that there was a good chance that the National Park Services' former Challenge Cost Share Program (CCSP) might be funded later in the calendar year. If so, Gibbons would alert them to this fact which might possibly aid in exotic plant eradication, a newly refurbished kiosk at the main parking lot or possibly the installation of an interpretive pull-out overlooking the Santa Maria River along the main park road.

SITE CONDITION	RECOMMENDATION (REPORTING OFFICIAL)	RECOMMENDATION (REGIONAL COORDINATOR)
<input type="checkbox"/> Satisfactory	<input type="checkbox"/> No action needed	<input type="checkbox"/> No action needed
<input type="checkbox"/> Threatened (probability unknown)	<input type="checkbox"/> Follow-up action (complete next section)	<input type="checkbox"/> Follow-up action (complete next section)
<input type="checkbox"/> Threatened (likely to occur in 1 year)	<input checked="" type="checkbox"/> Complete Part II but DO NOT list in Damaged & Threatened NNLs Report at this time	<input checked="" type="checkbox"/> Complete Part II but DO NOT list in Damaged & Threatened NNLs Report at this time
<input type="checkbox"/> Threatened (will occur in 1 year)	<input type="checkbox"/> Remove from Damaged & Threatened NNLs Report (complete Part II)	<input type="checkbox"/> Remove from Damaged & Threatened NNLs Report (complete Part II)
<input checked="" type="checkbox"/> Damaged (condition improving)	<input type="checkbox"/> List in Damaged & Threatened NNLs Report (complete Part II)	<input type="checkbox"/> List in Damaged & Threatened NNLs Report (complete Part II)
<input type="checkbox"/> Damaged (condition stabilized)		
<input type="checkbox"/> Damaged (condition worsening)		

**FOLLOW-UP ACTIONS NEEDED:**

**Ownership:**

- Complete ownership information not known.
- Ownership has changed. New information is listed below (attach map if possible).
- Collect recent, updated landowner information (Date of last update: \_\_\_\_\_)

**Technical Assistance:**

- Landowner(s) listed below desires the following technical information or other contact from NPS.
- Landowner(s) listed below desires information regarding the Challenge Cost Share Program.

**Plaques**

- New indoor plaque desired by landowner(s) listed below.
- New outdoor plaque desired by landowner(s) listed below.
- New certificate desired by landowner(s) listed below.

**NNL Boundary/Status**

- Boundary unclear. Legal description and accurate map needed.
- Due to damage that has occurred, the NNL boundary should be changed as described.
- Due to new information about the location of significant resources, the boundary should be changed as described.
- Due to a change in the patterns of ownership/management, the NNL boundary should be changed as described.
- The boundary should be changed for other reasons described below.
- The site should be dedesignated for the reason described.

**Other action needed:**



**NATIONAL NATURAL LANDMARK STATUS REPORT**  
**Part II a. Information on Threat Report**

Site: \_\_\_\_\_ State: \_\_\_\_\_ Date of Report: \_\_\_\_\_

**THREAT:** (fill out a different threats section for each different source activity threatening resources)

<b>Source Activity:</b> (check all that apply)	<input type="checkbox"/> Construction <input type="checkbox"/> Water projects <input type="checkbox"/> Agricultural <input type="checkbox"/> Mining <input type="checkbox"/> Visitor Use <input type="checkbox"/> Military <input type="checkbox"/> Contamination <input type="checkbox"/> Physical <input type="checkbox"/> Weather <input type="checkbox"/> Ecological <input type="checkbox"/> Unknown <input type="checkbox"/> Other  <b>Source Activity Description:</b>
---	---

The source activity marked above, threatens the following natural resources:

Resource Type:	Description of Resources:
Water	
Air	
Geologic	
Vegetation	
Wildlife	
Entire Ecosystem	
Other	

Nationally significant resources threatened?    Yes    No

Approximate extent of landmark threatened is \_\_\_\_%, or about \_\_\_\_ acres, in (number) \_\_\_\_ locations(s) (i.e., 4-mile stretch of shoreline)

Probability of activity occurrence:	<input type="checkbox"/> is likely to occur (unknown timeframe) <input type="checkbox"/> is likely to occur in 1 yr <input type="checkbox"/> will occur in 1 yr <input type="checkbox"/> already occurring.
Did this activity occur before designation?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> unknown
The agent of the activity is:	<input type="checkbox"/> NNL landowner <input type="checkbox"/> NNL manager <input type="checkbox"/> other person <input type="checkbox"/> natural processes <input type="checkbox"/> organization   __private, __municipal, __state, __federal Name:
Is the agent aware of the NNL designation?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> unknown <input type="checkbox"/> N/A
Does the agent have consent of the landowner?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> unknown <input type="checkbox"/> N/A

<b>Mitigating Actions:</b> <input type="checkbox"/> Proposed <input type="checkbox"/> Taken <b>Describe:</b>
Actions taken by: <input type="checkbox"/> NNL Landowner <input type="checkbox"/> NNL Manager <input type="checkbox"/> other person <input type="checkbox"/> natural processes <input type="checkbox"/> Organization:   __private   __municipal   __state   __federal Name:
As a result of these actions, the threat: <input type="checkbox"/> remains <input type="checkbox"/> has been somewhat mitigated <input type="checkbox"/> has been fully mitigated <input type="checkbox"/> has been eliminated

**Other Notes:**

**NATIONAL NATURAL LANDMARK STATUS REPORT**  
**Part II b. Information on Damage Report**

Site: Nipomo Dunes - Point Sal Coastal Area State: CA Date of Report: July 8, 2014

**DAMAGE:** (fill out a different damaged section for each different source activity damaging resources)

<b>Source Activity</b> (check all that apply)	<input type="checkbox"/> Construction <input type="checkbox"/> Water projects <input checked="" type="checkbox"/> Agricultural <input checked="" type="checkbox"/> Mining <input checked="" type="checkbox"/> Visitor Use <input type="checkbox"/> Military <input checked="" type="checkbox"/> Contamination <input type="checkbox"/> Physical <input type="checkbox"/> Weather <input type="checkbox"/> Ecological <input type="checkbox"/> Unknown <input type="checkbox"/> Other <b>Source Activity Description:</b>
The source activity marked above, has damaged the following natural resources:	
<b>Resource Type:</b>	<b>Description of Resources:</b>
Water	Hydrocarbon contamination of shallow aquifers, channel alteration, current disruption
Air	
Geologic	Dune and beach erosion, and sand mining
Vegetation	Destruction/removal of dune vegetation, exotic plants, damage to wetland plant communities of freshwater springs
Wildlife	Predation of native species by non-native fauna and destruction of bird nesting areas
Entire Ecosystem	Wetland drainage; destruction of beach, wetland spring & dune communities; shallow aquifer contamination
Other	
Nationally significant resources damaged? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Approximate extent of landmark damaged is <u>20</u> %, or about _____ acres, in (number) _____ location(s) (i.e., 4-mile stretch of shoreline)	

The agent of the activity is: <input checked="" type="checkbox"/> NNL landowner <input checked="" type="checkbox"/> NNL manager <input type="checkbox"/> other person <input type="checkbox"/> natural processes <input type="checkbox"/> organization <input checked="" type="checkbox"/> private, _____ municipal, <input checked="" type="checkbox"/> state, _____ federal Name: <b>Unocal, CA State Parks</b>	
Is the agent aware of the NNL designation? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> unknown <input type="checkbox"/> N/A	Does the agent have consent of the landowner? <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> unknown <input checked="" type="checkbox"/> N/A
Did this activity occur before designation? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> unknown	
The activity occurred because: <input checked="" type="checkbox"/> The agent planned the activity, and the resulting impacts were _____ intentional <input checked="" type="checkbox"/> unintentional <input type="checkbox"/> The activity was unplanned, and the impact resulted from _____ neglect _____ inability to prevent them _____ other	
In my best judgement, the impact is: <input type="checkbox"/> Unrestorable <input checked="" type="checkbox"/> Restorable by management action in: <b>20-50 years</b> OR <input checked="" type="checkbox"/> Restorable by natural processes in: _____ 1-5 yrs _____ 5-20 yrs <input checked="" type="checkbox"/> 20-50 yrs _____ >50 yrs	
In addition to the damages already incurred, does this source activity continue to threaten more resources? <input type="checkbox"/> yes <input type="checkbox"/> no <b>Unknown</b>	

<b>Mitigating Actions:</b> <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Taken Describe: Protection of least tern and snowy plover nesting birds at Oceano Dunes SVRA, fencing of riparian/wetland areas, control of exotic plant species, protection of coastal dune scrub vegetation through wetland (i.e., ponds) restoration at Guadalupe-Nipomo Dunes NWR.
Actions taken by: <input checked="" type="checkbox"/> NNL Landowner <input checked="" type="checkbox"/> NNL Manager <input type="checkbox"/> other person <input type="checkbox"/> natural processes <input type="checkbox"/> Organization: _____ private _____ municipal <input checked="" type="checkbox"/> state <input checked="" type="checkbox"/> federal Name: Unocal, CA State Parks, U.S. Fish and Wildlife Service.
As a result of these actions, the impact: <input type="checkbox"/> remains <input checked="" type="checkbox"/> has been somewhat mitigated <input type="checkbox"/> has been fully mitigated <input type="checkbox"/> has been eliminated

**Other Notes:** Please refer to page 1 and 2 of the Status Report



**From:** [Simon.Larry@Coastal](mailto:Simon.Larry@Coastal)  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Subject:** GND CCP  
**Date:** Thursday, April 14, 2016 10:56:32 AM

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The Coastal Commission staff provides the following comments on the Draft Comprehensive Conservation Plan/Environmental Assessment for the Guadalupe-Nipomo Dunes National Wildlife Refuge. Once the U.S. Fish and Wildlife Service has developed the final CCP, the Service will need to prepare and submit to the Commission a consistency determination which documents the CCP's consistency with the California Coastal Management Program. The Commission staff is available to assist the Service in the preparation of the consistency determination. Please contact me should you have any questions regarding this manner.

Larry Simon  
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Energy, Ocean Resources and  
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**From:** [REDACTED]  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov); [michael\\_brady@fws.gov](mailto:michael_brady@fws.gov)  
**Cc:** [REDACTED]  
**Subject:** Guadalupe-Nipomo Dunes CCP Comments  
**Date:** Wednesday, April 13, 2016 9:09:09 PM  
**Attachments:** [GDNWR CCP Final Comments 2016.pdf](#)

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Please accept the attached document in response to the Guadalupe-Nipomo Dunes CCP.

Please acknowledge receipt.

Sincerely,

Jim Sutty  
President, Friends of Oceano Dunes



Jim Suty, President  
E-mail: [jim@oceanodunes.org](mailto:jim@oceanodunes.org)  
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April 13, 2016

**By Email:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Brady, Michael** [michael\\_brady@fws.gov](mailto:michael_brady@fws.gov)

U.S. Fish and Wildlife Service  
Pacific Southwest Region  
Refuge Planning  
2800 Cottage Way, W-1832  
Sacramento, CA 95825

RE: Guadalupe-Nipomo Dunes CCP

Dear Mr. Brady:

These comments are submitted on behalf of Friends of Oceano Dunes ("Friends"), a California not-for-profit corporation and watchdog association, representing approximately 28,000 members and users of the Oceano Dunes State Vehicular Recreation Area ("SVRA") located near Pismo Beach, California in San Luis Obispo County and adjacent to the Guadalupe-Nipomo Dunes National Wildlife Refuge ("Refuge").

Friends was formed in 2001 **for the express purpose of “preserving and developing recreational uses” in the “Oceano Dunes area” of San Luis Obispo County.** The dunes area covers not only Oceano Dunes SVRA but also the dune complex that runs for 18 miles along the central coast and includes the area encompassed within Guadalupe-Nipomo Dunes National Wildlife Refuge. The purposes of the Act at issue, 16 U.S.C. § 668dd et seq., include the conservation and management of wildlife and recreational interests, such as wildlife observation, photography, fishing, hiking, exploring, and education, and active public participation in the development of management and conservation plans for the Refuge. Friends' members live near, use, recreate, visit and personally enjoy the aesthetic, wildlife and recreational resources of the Refuge. Preserving these interests in the area that includes the Refuge at issue are germane to the purpose of Friends, which accords with one of the purposes of the Act to ensure the compatibility of conservation and wildlife-dependent recreation as part of the mission of the refuges, as set forth in 16 U.S.C. § 668dd(a)(2),(3),(4) and as a required part of each CCP, as set forth in 16 U.S.C. § 668dd(e).

The Department of the Interior, acting through the U.S. Fish and Wildlife Service ("FWS"), manages the National Wildlife Refuge System (System) pursuant to the

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National Wildlife Refuge System Administration Act of 1966, Pub. L. No. 89-669, 80 Stat. 927, as amended by the National Wildlife Refuge System Improvement Act, Pub L. No. 105-57, 111 Stat. 1252 (1997) (codified at 16 U.S.C. §§ 668dd-668ee).

Friends submits the following comments on the Draft Comprehensive Conservation Plan/Environmental Assessment for the Refuge:

**1. FWS should not delay any further the development and implementation of an effective predator management plan because further delay is not compatible with the purpose of the Refuge.**

The National Wildlife Refuge System Improvement Act of 1997 (16 U.S.C. 668dd-668ee) requires the FWS to develop a Comprehensive Conservation Plan ("CCP") for each national wildlife refuge. The "purpose in developing a CCP is to provide refuge managers with a 15-year plan for achieving refuge purposes and contributing toward the mission of the National Wildlife Refuge System, consistent with sound principles of fish and wildlife management, conservation, legal mandates, and our policies." (81 Fed.Reg. 10882 (March 2, 2016) (Notice of availability of Guadalupe-Nipomo Dunes National Wildlife Refuge, San Luis Obispo County, CA: Draft Comprehensive Conservation Plan/Environmental Assessment))

As noted in the Environmental Assessment, the Refuge is key to the western snowy plover's recovery: "The Refuge, which includes designated critical habitat for the western snowy plover, is located within Recovery Unit 5, which supports the greatest number of western snowy plovers (approximately half of the U.S. population), and has the greatest amount of available suitable habitat to support this listed species (USFWS 2007)." (Environmental Assessment ("EA"), p. B-47) Most plover in Recovery Unit 15 are at Oceano Dunes and are the result of a very successful management program being implemented by the California Department of Parks and Recreation.

One legal mandate for the Guadalupe-Nipomo Dunes National Wildlife Refuge is to protect, preserve, conserve and assist in the recovery of federally listed endangered or threatened species, such as the western snowy plover: "Refuge goals include (1) protecting restoring and enhancing native habitat to aid in the recovery of federally listed and special status species and critical habitat; (2) protecting and restoring coastal dune and other natural communities to support the diverse species of the central California coast; and (3) providing safe and high-quality opportunities for compatible wildlife-dependent educational and recreational activities to foster public appreciation of the natural heritage of the region." (81 Fed.Reg. 10882 (March 2, 2016) (Notice of availability of Guadalupe-Nipomo Dunes National Wildlife Refuge, San Luis Obispo County, CA: Draft Comprehensive Conservation Plan/Environmental Assessment)) Thus, the "western snowy plover is one of the threatened species for which the Refuge was established." (Draft CCP, p. 84)

ESA Section 4 (16 USC § 1533(a), (b)) considers predator control in the determination of endangered and threatened species status.

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16 USC § 668dd(a)(3) sets forth policy governing management of refuge:

"(3) With respect to the System, it is the policy of the United States that—  
(A) each refuge shall be managed to fulfill the mission of the System, as well as the specific purposes for which that refuge was established . . . ."

"One of the most important parts of the CCP process is the development and refinement of the refuge vision and goals." (Draft CCP, p. 83) The Draft CCP recognizes that this refuge was "primarily established" to conserve imperiled species and work toward recovery of the federally threatened western snowy plover. (Draft CCP, p. 1)

The Environmental Assessment states that the "recovery plan for the western snowy plover (USFWS 2007) identifies expanding predator populations as one of the primary reasons for a decline in active nesting areas and in the size of the breeding and wintering populations." (EA, p. B-13)

However, the CCP does not require the development and implementation of a predator management plan until 2018 – more than 2 years from now and 18 years after the refuge was established to protect the western snowy plover. At the same time, the **Draft CCP admits that "between 2002 and 2013, an average of 33% of snowy plover nests on the Refuge were predated upon** (USFWS 2014a)." (Draft CCP, pp. 86-87)

In addition, other than installing the exclosures, no other predator management strategies have been employed on the Refuge for protection of western snowy plover. (Draft CCP, p. 74) This fails to live up to mandatory responsibilities under the ESA.

**Worse yet, the CCP suggests that "an** avian and mammalian predator management plan, which would require compliance with NEPA, would be developed following approval of the CCP to reduce threats to snowy plover adults, chicks, and eggs from various individual species." (EA, p. 13) This predator management plan should be part of this CCP and EA. It should not be deferred when this refuge was "primarily established" to conserve imperiled species and work toward recovery of the federally threatened western snowy plover. (Draft CCP, p. 1)

The absence of an effective predator management plan is inconsistent and incompatible with the refuge's own mission and purpose, and with the guidance and policies of the FWS. 602 FW 1 (Refuge Planning Overview) (1.3) states that "Each plan [CCP] will be founded on principles of sound fish and wildlife management and available science, and be consistent with legal mandates and our other policies, guidelines, and planning documents. We will prepare refuge plans that, above all else, ensure that wildlife comes first on national wildlife refuges." See also, 602 FW 3 (3.3) (Comprehensive Conservation Planning Process). An average nesting predation rate of 33% is not ensuring wildlife comes first. 602 FW 1 (1.6)(E) states how the CCP provides "long-range guidance and management direction to achieve the purposes of the refuge;

helps fulfill the mission of the Refuge System." The FWS needs a CCP that more effectively addresses this predation rate and in a more timely manner.

The program for protecting sensitive species implemented by the California Department of Parks and Recreation (with the active assistance of Friends, and its members) at the adjacent state recreation area is an order of magnitude more successful in protecting such species than any effort currently undertaken by FWS at the Refuge. This is true even though between 1.5 and 2 million people visit the state facility each year and only a tiny number of people visit the Refuge.

## **2. Taking of Western Snowy Plover: An average of 33% snowy plover nests subjected to predation on the Refuge shows existing predator management or control is not only inadequate, but also violates § 9 of ESA.**

Friends and its members have grave concerns about the very poor success rate that FWS has had for the past decade in implementing a predator management plan at the Refuge. "Between 2002 and 2013, an average of 33% of snowy plover nests on the Refuge were predated upon (USFWS 2014a)." (Draft CCP, pp. 86-87) With respect to the threatened western snowy plover in particular, FWS repeatedly allows numerous birds to be killed by predators each year due to a wholly inadequate predator management plan. The promulgation of the mandated CCP, with mandatory input from the public and affected persons, and with required coordination with the California Department of Parks and Recreation, would help alleviate such harm and should be implemented immediately.

Section 9 of the Endangered Species Act prohibits any person, including federal, state and local agencies from taking endangered or threatened species. (16 U.S.C. § 1538(a)(1); 16 U.S. Code § 1532(13) ("The term "person" means an individual, corporation, partnership, trust, association, or any other private entity; *or any officer, employee, agent, department, or instrumentality of the Federal Government*, of any State, municipality, or political subdivision of a State, or of any foreign government; any State, municipality, or political subdivision of a State; or any other entity subject to the jurisdiction of the United States.")); *Babbitt v. Sweet Home Chapter of Communities for a Great Oregon*, 515 U.S. 687 (1995)

Courts have held that government agencies charged with wildlife control or management engage in a taking in violation of ESA both by conduct and the failure to act that resulted in harm to a protected species. *Strahan v. Cox*, 127 F.3d 155 (1st Cir. 1997) (State licensing system authorizing gillnet and lobster pot fishing caused injury to protected endangered whales and the Court properly enjoined state officials from causing harm.); *Sierra Club v. Lyng*, 694 F.Supp. 1260 (E.D. Tex. 1988) (Court held U.S. Forest Service's management activities constituted a taking in violation of Section 9 by causing population declines of red-cockaded woodpeckers ranging from 41 percent to 76 percent on lands managed by Forest Service in a period of less than 4 to 9 years.); *Palila v. Hawaii Department of Land and Natural Resources*, 852 F.2d 1106 (9th Cir. 1988) (State agency's failure to remove mouflon sheep from Palila bird's habitat

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constitutes a taking based on habitat destruction that could result in extinction as the sheep were damaging the woodland upon which the Palila depend for food and shelter.)

The Draft CCP fails to show that the FWS will ensure compliance with the ESA and Refuge law to protect the western snowy plover.

**3. FWS should not delay the development and implementation of an effective predator management plan for the California least tern as data shows significant number of predator killings may occur in as short a period of time as an hour or a week, and the first documented occurrence at the Refuge of one predator, feral swine, was back in 2009.**

The Refuge was also established with the goal of recovery of the federally endangered California least tern (Draft CCP, p. 1) that was federally listed "[d]ue to declining population sizes." (Draft CCP, p. 58)

Breeding activities have not been recorded at the Refuge but breeding activities of California least tern have been documented at the nearby ODSVRA: "During the last 14 years, the California least tern has been intermittently observed flying over Refuge beaches and foredunes and feeding in the surf adjacent to the Refuge. Breeding activities of the California least tern have not been recorded on the Refuge, but breeding is well-documented about 2.0 miles north of the Refuge on the ODSVRA and about 1.5 miles south of the Refuge, adjacent to the Santa Maria River estuary." (Draft CCP, p. 59)

Predators affect both western snowy plover and California least tern in both indirect as well as direct impacts. "Predators and predation can be an important factor limiting least tern and snowy plover reproductive success (Page et al. 1995, Thompson et al. 1997, USFWS 2007, USFWS 1985). Predation of nests and chicks has been identified as an important cause of population decline (Page et al. 1983, Colwell et al. 2005). Predators may impact plovers directly by depredating eggs, chicks, juveniles, or adults. Further, predators may indirectly affect plovers by increasing disturbance, which can increase time spent by adults in vigilance or avoidance behavior, and may limit incubating and brooding behavior. Depredation of plover may result in egg abandonment or loss of dependent chicks. Predation can occur quickly, leaving little or no evidence, and it is likely that only a small percentage of events are documented. Even when monitors are present, there are limitations in the ability to detect predators. Currently, no lethal predator management activities occur on the Refuge. However, ODSVRA maintains an active predator management program throughout the breeding season. Due to the close proximity of that site, some incidental benefits of their activities may occur on the Refuge. Partners and adjacent landowners continue to participate in predator management in varying degrees as well." Appendix J, pp. J-4 to J-5)

The FWS Revised California Least Tern Recovery Plan (1980 and revised in 1985) [https://ecos.fws.gov/docs/recovery\\_plan/850927\\_w%20signature.pdf](https://ecos.fws.gov/docs/recovery_plan/850927_w%20signature.pdf) noted that past conservation efforts of "Predator control through judicious use and placement of electric fences and other barriers as well as by trapping efforts have

reduced losses of adults, eggs, and/or young." (Recovery Plan, p. 19) The 5-year review (2006) ([https://ecos.fws.gov/docs/five\\_year\\_review/doc775.pdf](https://ecos.fws.gov/docs/five_year_review/doc775.pdf)) plan stated that predators can "cause significant loss to a least tern colony in a matter of days or in a nesting season." (5-year Review, p. 17) For example, within just a week, one or more kestrels killed approximately 100 chicks from the Venice tern colony in 1982 and one female kestrel took five tern chicks in an hour at Batiquitos Lagoon. (5-year Review, p. 17)

Objective 1.8 is to implement "by 2017" a "feral swine control and monitoring plan to reduce threats" to several species, including the western snowy plover and California least tern. (Draft CCP, p. 91) The rationale is that: "Feral swine populations grow rapidly and as habitat generalists, these opportunistic omnivores can be found in a variety of habitats. They are known to eat almost anything from grass, worms, and insects to young fawns, small mammals, eggs and chicks of ground-nesting birds, and reptiles (CBI 2009; CDPH 2013), but their diet generally consists of plants (e.g., roots, tubers, fruit, acorns). Feral pigs cause extensive and severe soil disturbance due to rooting, wallowing, and trampling. Their foraging techniques can result in serious disturbance to soils and associated plants and animals (Sweitzer and Van Vuren 2002, 2008). The federally listed species on the Refuge are particularly vulnerable to disturbance and/or take as a result of their presence." (Draft CCP, p. 91) "A feral swine control and monitoring plan, prepared in association with the CCP and available for review as Appendix J of the Draft CCP, would be implemented under Alternative B to protect" among other protected species, the western snowy plover and California least tern. "In accordance with this step-down plan, feral swine would be controlled to reduce predation and damage to the habitat of these species. Although eradication of feral swine from the Refuge has been deemed unlikely, control of the existing population is expected to reduce the level of current impact to habitat and listed species. No more than 20 traps (e.g., corral-style, cage, drop-net, padded leg hold, box), totaling no more than 400 square feet, would be installed at one time. More information on the feral swine control and monitoring is detailed in Appendix J of the Draft CCP." (EA, p. B-12)

The FWS has delayed feral swine control plan even though "[f]eral swine represent a serious threat to the diversity of habitats and species protected within the **region's** conserved lands, including the range of listed and sensitive species supported on the Refuge" and "[a]ctions to eliminate this threat are consistent with Service policy and regulations, are compatible with the purposes for which the Refuge was established, and will assist in achieving the goals and objectives for the Refuge as stated in the Guadalupe-Nipomo Dunes NWR CCP." (Appendix J, p. J-11) "Currently feral swine are being managed by adjacent land managers, partners and neighboring growers, but no management is taking place on the Refuge or the adjacent Chevron property. Because of the lack of swine control on the Refuge, swine are harboring on the Refuge thus reducing the effectiveness of feral swine control conducted by adjacent landowners." (Appendix J, p. J-1) Feral swine control would benefit a "wide variety of species," including the western snowy plover. Indeed, feral swine "predation of a western snowy plover nest occurred in 2011." (Appendix J, p. J-4)

In fact, the ODSVRA Predator Management Plan established in 2008 has been beneficial: "Predation by both native and nonnative species has been identified as a major factor limiting western snowy plover reproductive success, which is well documented in the Recovery Plan for the species (USFWS 2007). The Refuge annual plover reports also identify and document numerous instance of known and unknown predator depredation to eggs, chicks and adult plover (Guadalupe NWR Annual Plover Reports 2001-2013, unpublished reports). In **2008, the Service's partner and adjacent** land management agency, the ODSVRA, initiated a Predator Management Plan for the protection of western snowy plover and California least tern (*Sterna antillarum browni*) (ODSVRA 2008). The implementation of this plan reduces predation of eggs, chicks and adults to support the recovery plan fledging goal of 1.0 to 1.2 juveniles per western snowy plover male adult. Feral swine are known to predate nests at the Refuge." (Appendix J, p. J-1)

The "first occurrence of feral swine on the refuge was documented during the summer of 2009," and while the "Refuge source population is unknown, [it is] believed to be expanding." (Appendix J, p. J-4) But, the FWS control plan may not be implemented until 2017. (Appendix J, p. J-4) However, local farmers responded the same year as the first documented occurrence: "Local farmers fenced the agricultural fields and received depredation permits from California Department of Fish and Wildlife to remove swine during the fall of 2009." (Appendix J, p. J-4)

Objective 1.3 for the Refuge is to "By 2018, develop and implement a predator management plan that includes relocation of avian species and lethal removal of some mammalian and avian species to increase nesting success of beach nesting birds." (Draft CCP, p. 86) The strategy for objective 1.3 appears to focus on measures to protect western snowy plover (e.g., "Control native and non-native avian and mammalian individuals using nonlethal and lethal methods when identified as a threat to snowy plovers;" "When appropriate, use nest exclosures in snowy plover nesting areas;" Regularly remove trash and carcasses from plover habitat to minimize attracting predators;" Work with partners to identify and implement new predator management techniques to protect snowy plover nests and young.") (Draft CCP, p. 87) While "California least tern are not known to nest on the Refuge, they have been observed roosting in the beach areas of the Refuge and are known to nest on neighboring lands. It is anticipated that invasive weed control and the implementation of a feral swine control and monitoring plan would benefit the least tern." (EA, p. B-13) The Draft CCP states that the "proposal to prepare and implement a step-down predator management plan is also expected upon its implementation to provide benefits to listed species, particularly the western snowy plover and California least tern, as predation is identified as a known threat to these species." (EA, p. B-50) However, "[d]isturbance and/or predation have been reported in least tern colonies from burrowing owls and American kestrels (Collins and Bailey 1980). In one large colony, disruption and abandonment was suspected of being caused by house cats. Other predators include larger birds and mammals such as raccoons, foxes, and domestic dogs." (Draft CCP, p. 59)

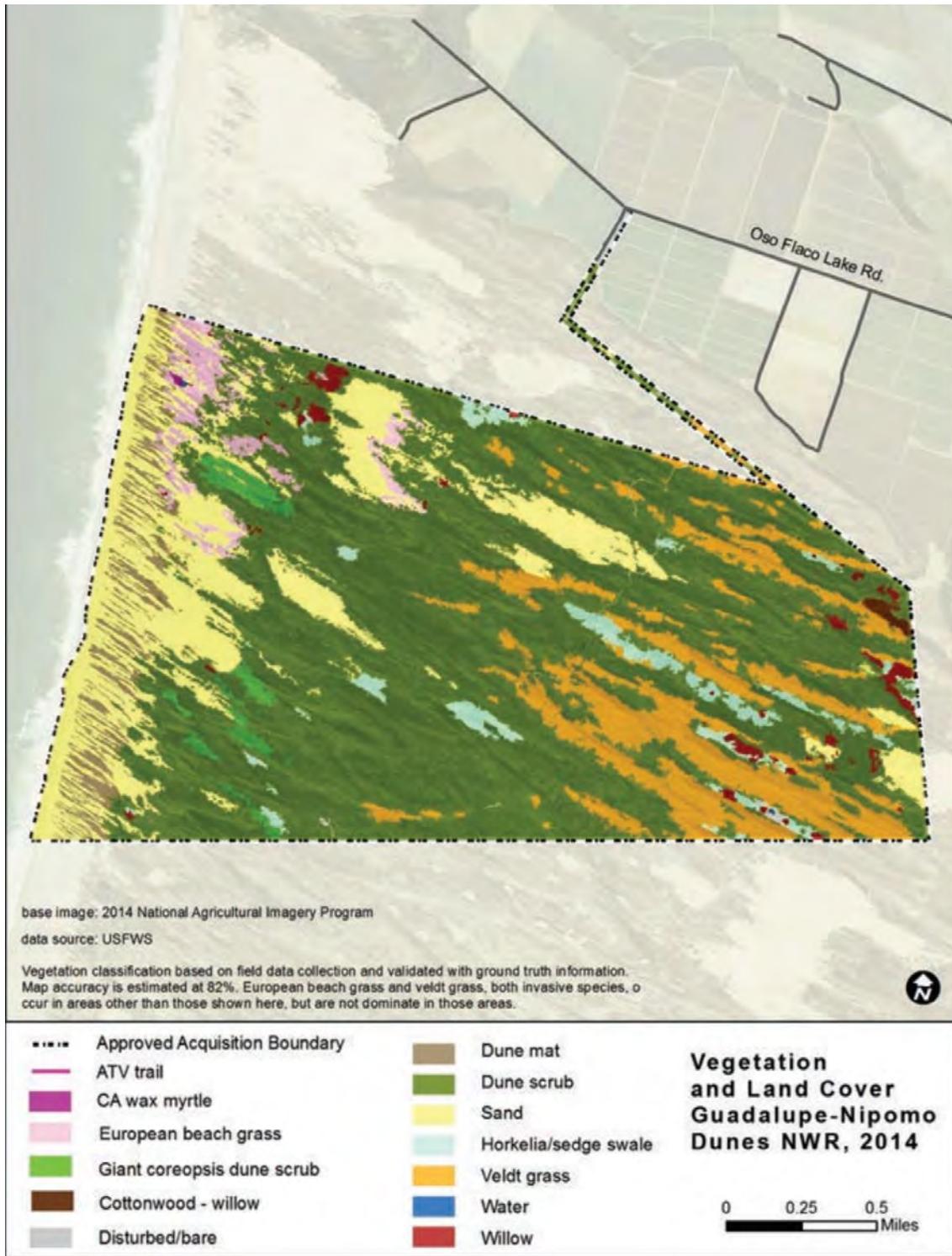
Thus, California least tern will benefit from strategies that reduce attracting predators to the Refuge now. As noted above, courts have held that government agencies charged with wildlife control or management engage in a taking in violation of ESA both by conduct and the failure to act that resulted in harm to a protected species. The Draft CCP fails to show that the FWS will ensure compliance with the ESA and Refuge law to protect the California least tern.

#### **4. The FWS should remove the non-native, invasive plant species and vegetation to better restore the Refuge to its natural sand sheets.**

One of the Refuge's interim management goals since it was established in 2000 is to "[p]rotect, restore, and enhance native habitats to aid in the recovery of federally listed species (those species federally designated as threatened and/or endangered)." (Draft CCP, p. 1) However, invasive plant species threaten the habitat and survival of Western Snowy Plovers and California Least Terns. The Draft CCP recognizes that plovers choose sites where vegetation is absent: "They [Western snowy plover] nest in open, flat, sparsely vegetated beaches and sand spits above the high tide. Western snowy plover often return to the same breeding sites year after year. They lay their eggs in shallow depressions in sandy or salty areas that generally are devoid of vegetation. Because the sites they choose are in loose sand or soil, nesting habitat is constantly changing under the influence of wind, waves, storms, and encroaching plants. Nests typically occur in flat, open areas with sandy or saline substrates. Vegetation and driftwood are usually sparse or absent." (Draft CCP, p. 56) The same is true for the California Least Tern: "The California Least Tern Recovery Plan (USFWS 1985) and five-year review (USFWS 2006) also points to non-native invasive plants as a threat to the least tern." (Draft CCP, p. 86) And, plover numbers have decreased due to habitat degradation: "As early as the 1970s, biologists suspected a decline in plover numbers. The primary cause is loss and degradation of habitat. The introduced European beachgrass (*Ammophila arenaria*) contributes to habitat loss by reducing the amount of open, sandy habitat and contributing to steepened beaches and increased habitat for predators. Urban development has reduced the available habitat for western snowy plovers while increasing the intensity of human use, resulting in increased disturbance to nesting plovers (USFWS 2014b)." (Draft CCP, p. 56)

In addition, "The Western Snowy Plover Recovery Plan (USFWS 2007b) identified predation as a significant threat and recommended preventing excessive predation for western snowy plovers." (Draft CCP, p. 86) And, "[i]nvasive species have the potential to alter foraging, nesting, and roosting habitat of endangered species and migratory birds that occur on the Refuge." One strategy is to "reduce beach vegetation to limit predator cover." (Draft CCP, p. 87)

Appendix G shows a vegetation map illustrating extensive areas of invasive species, such as perennial veldt grass and European beach grass, which are listed as "Issues and Concerns Identified by Staff." (Draft CCP, p. 21)



G-1

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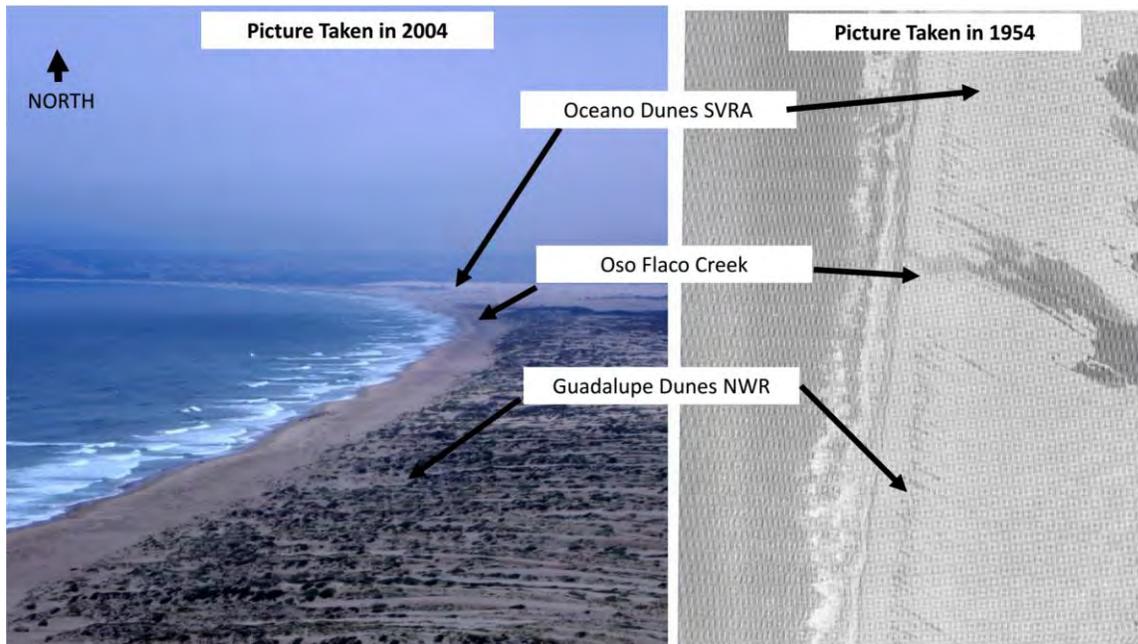
Friends would appreciate if FWS developed management plans that were implemented faster. "As of 2014, estimates provided by GIS vegetation mapping indicate that about 58% (130 acres) of coastal foredunes and back dunes of the 2,553-acre Refuge were still infested with European beachgrass (Appendix G)." (Draft CCP, p. 68) "In 2014, vegetation mapping of the Refuge indicated that approximately 940 acres (about 37%) of the 2,553-acre area of the Refuge is infested with perennial veldt grass (Appendix G). If left uncontrolled, this highly invasive species will likely continue to spread into natural sand dune and central coast dune scrub habitats on the Refuge, where it likely will outcompete native plant species." (Draft CCP, p. 70)

Removal yields positive impacts on birds that cannot be underestimated: "As early as 2009, anecdotal observations suggested that an increase in western snowy plover nesting occurred in the immediate area where removal occurred" of invasive plant species. (Draft CCP, p. 69)

Yet, for example, Objective 1.2 sets a low goal: "Within the life of the CCP, achieve and maintain 90 acres of coastal strand and coastal dune habitat (RPMA 1) (See Appendix H) with no more than 20% occurrence of invasive plant species (e.g., beachgrass, veldt grass, iceplant) to support western snowy plover and California least tern nesting habitat." (Draft CCP, p. 86) The rationale for Objective 1.2 states why removal of invasive plant species should occur more quickly: "One of the primary threats identified in the Western Snowy Plover Recovery Plan (USFWS 2007b) is habitat loss and degradation attributed to introduced beachgrass (*Ammophila* spp.) and other grasses." (Draft CCP, p. 86) Another example is Objective 2.2 that includes strategies to remove invasive plant species: "Over the life of the CCP, maintain the existing 200-acre spatial extent of naturally shifting, primarily unvegetated open sand cover in RPMAs 4, 5, 7, and 9." (Draft CCP, p. 96) And Objective 2.5: "Within five years, reduce cover of perennial veldt grass by 50% (of 2017 baseline survey) in three or more RPMAs to protect high-quality sand sheet, willow forest, wetland pond, dune swale, and coastal dune scrub habitat. Within 15 years, reduce cover of perennial veldt grass by 75% in those RPMAs." (Draft CCP, p. 98)

One problem is that a prior study showed how quickly beachgrass increased at the Refuge: "Chestnut (1997), who studied the spread of European beachgrass at the Guadalupe-Nipomo Dunes in San Luis Obispo County, documented an increase in beachgrass from approximately 8 to 109 hectares (20 to 270 acres) between 1969 and 1997 and found that its rapid spread through native vegetation posed a serious threat to nesting western snowy plovers and rare plants. Refuge staff identified RPMA 1 as having 95% of western snowy plover breeding activity; therefore, its ability to provide weed-free nesting habitat is critical to snowy plover breeding success." (Draft CCP, p. 86)

The attached, Attachment A, shows a photographic, historical overview of vegetation over the years 1972-2015. The picture below shows the difference in increased vegetation from 1954 to 2004:



The Draft CCP identifies "early detection and rapid response" as key: "The 2008-2012 National Invasive Species Management Plan (NISC 2008) also identifies early detection and rapid response as one of the strategic goals for prevention, control, and minimization of invasive species and their impacts. Early detection and rapid response prevention are one of the most effective means of avoiding costly long-term control measures." (Draft CCP, p. 99)

**5. The FWS should prepare a schedule and deadlines to ensure the CCP and its measures are implemented in timely manner and to prevent further delay.**

The FWS needs to establish a schedule and deadline with milestones for completing the CCP and implementing the measures. As stated in the *Conceptual Management Plan, Proposed Guadalupe-Nipomo Dunes National Wildlife Refuge* (July 2000) p. 1: "CCPs are generally completed within fifteen years after the Refuge has been established."

<http://babel.hathitrust.org/cgi/pt?id=umn.31951d01962977b;view=1up;seq=23>

The FWS already has failed to meet the National Wildlife Refuge System Administration Act's requirements to prepare and adopt a final Comprehensive Conservation Plan for the refuge by August 2015.

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The failure to adopt a final CCP violates the Act as well as the Administrative Procedure Act (APA), which provides that courts shall compel agency action unlawfully withheld, or unreasonably delayed. (5 U.S.C. § 706(1); 5 U.S.C. § 551(13))

**6. The FWS needs to provide more information about the "pilot loop trail" to direct the public away from plover nesting habitat and the "connectivity trail" to provide "hiking/equestrian trail connectivity through the refuge, ODSVRA, and the entire Oceano Dunes Complex."**

The Draft CCP references a potential program "pilot loop trail" and a "connectivity trail," but provides little information about either trail sufficient for the public to evaluate. As "Public involvement is an important and required component of the CCP and NEPA process," (Draft CCP, p. 19) more information is needed to enable the public to exercise its right and opportunity to participate in decisions regarding the management of the refuge by evaluating any proposed or potential trails.

The Draft CCP briefly discusses a 5-year pilot program to establish a "loop trail": "Objective 3.1 Beginning in 2017, conduct a five-year pilot program intended to redirect how the public accesses the interior of the Refuge by establishing a loop trail (see Appendix I) roughly 200 yards from the northern boundary to Myrtle Pond, Hidden Willow Valley, and Oso Flaco Peak and well away from plover nesting areas (the proposed trail would also be open during the plover non-breeding season)." (Draft CCP, p. 103) The rationale for this objective is to "attempt to reduce human disturbance to snowy plovers during the breeding season while continuing to offer wildlife observation and photography year round, two of the priority public uses on Refuges, per the 1997 Improvement Act. This objective is offered as a pilot program due to limited staffing and unknown compliance of visitors. Data over time will measure non-compliance to determine if this trail should be permanent. During the western snowy plover breeding season, limit foot travel from the beach to Refuge inland through designated corridors to reduce disturbance and potential nest and egg damage in western snowy plover habitat from visitors." (Draft CCP, p. 103) Depending on which alternative is selected, this Objective 3.1 could include installation of fencing, signage, interpretive panels, and benches. (Draft CCP, p. 103 (Objective 3.1 strategy table). This pilot trail is also referenced as a "trail corridor" in the EA: "Public access through snowy plover breeding habitat to the back dunes of the Refuge would also be limited to a marked trail corridor (five-year pilot project) to reduce human disturbance." (EA, p. B-12; see also, EA pp. B-15, B-19, B-25) The pilot loop trail is presented in a map in Appendix I to the Draft CCP. The Appendix I map shows a trail located on the Refuge.



U.S. Fish & Wildlife Service

**Guadalupe-Nipomo Dunes National Wildlife Refuge**  
San Luis Obispo County, California

*Trail Map*



The Draft CCP lists a separate "connectivity trail" as public uses: "Include hiking/equestrian trail connectivity through the refuge, ODSVRA, and the entire Oceano Dunes Complex" as part of the Chapter 2 Comprehensive Conservation Planning

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Process. (Draft CCP, pp. 21-22) The FWS needs to provide more information on the location, plans and impacts for this "connectivity trail." It is difficult to determine if these proposed actions would potentially have significant environmental or recreational effects based on the information provided.

**7. The FWS must prepare a more comprehensive Environmental Impact Statement because the EA fails to provide sufficient information regarding the direct and indirect impacts of failing to take action and also impacts of delaying action proposed to address predator management as well as information needed on the two proposed trails.**

"Based on the analysis documented in this Draft EA, the Regional Director must determine whether the selected management alternative would have a significant effect on the human environment. If a determination can be made that the selected management alternative will not have a significant effect on the human environment, a Finding of No Significant Impact can be made; however, if there is a potential for significantly affecting the quality of the human environment an EIS must be prepared before making a decision." (EA, p. B-5)

Environmental analysis needs to be conducted on delaying a predator management plan until 2018, and on the impacts of the two proposed trails: the "pilot loop trail" and the "connectivity trail" to provide "hiking/equestrian trail connectivity through the refuge, ODSVRA, and the entire Oceano Dunes Complex." The EA states that an action or alternative containing that action "should generally not receive further consideration if:

- **It is illegal** (unless it is the no-action alternative, which must be considered to provide a baseline for evaluation of other alternatives, even though it may not be capable of legal implementation).
- **It does not fulfill Refuge purposes or the mission of the Refuge System.**
- **It does not relate to or help achieve Refuge goals.**
- **Its environmental impacts are already evaluated in an approved NEPA document."** (EA, p. 10)

In addition, "The management alternative selected for implementation must be consistent with the following criteria:

- **Forwards the mission of the Refuge System;**
- **Addresses the purposes for which the Refuge was established;**
- **Provides guidance for achieving the Refuge's vision and goals;**
- **Protects the sensitive native habitats and listed species present on the Refuge;**
- **Adheres to the scientific principles of sound fish and wildlife management and listed species recovery; and**
- **Complies with all applicable legal mandates."** (EA, pp. B-10-B-11)

Alternative B mentions the five-year pilot loop trail, but not the "connectivity trail," which renders it difficult to determine if these criteria are met. (EA, pp. B-12 to B-

15) The information and description in the EA is not sufficient to determine whether there are significant environmental impacts.

Sincerely,

A handwritten signature in black ink, appearing to read 'JS', with a stylized flourish at the end.

Jim Sutty  
President – Friends of Oceano Dunes

cc: Board of Directors  
Tom Roth, Attorney

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Attachment A



N35 01.25 W120 38.37 [Image 201503313](#) Fri Sep 11 13:54:55 2015 [Copyright © 2015 Kenneth & Gabrielle Adelman. All rights reserved.](#)



N35 01.23 W120 38.36 [Image 201317701](#) Fri Oct 4 14:14:59 2013 [Copyright © 2013 Kenneth & Gabrielle Adelman. All rights reserved.](#)



N35 01.25 W120 38.35 [Image 201007438](#) Fri Sep 24 14:21:04 2010

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N35 01.27 W120 38.57 [Image 200510352](#) Fri Oct 28 15:20:39 2005  
Nearest caption: The aircraft is a Beech Bonanza, a high-performance airplane (at [Image 200510354](#), 697 ft South)

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N35 01.23 W120 38.36 [Image 200404103](#) Mon Oct 11 15:10:34 2004  
Nearest caption: Oso Flaco Creek Mouth; Oceano Dunes SVRA (at [Image 200404094](#), 3600 ft North)

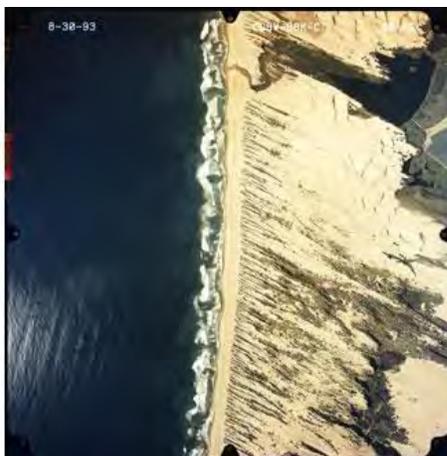
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N35 01.23 W120 38.47 [Image 2466](#) Mon Sep 2 12:29:36 2002  
Nearest caption: Guadalupe Beach, Guadalupe Dunes (at [Image 2473](#), 3354 ft South)

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N35 01.12 W120 38.37 [Image 199300086015](#) Aug 30 1993

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N35 01.36 W120 38.36 [Image 8910047](#) Jan 1989

Nearest caption: Santa Maria Rivermouth; Site of huge Unocal Oil Spill (at [Image 8910024](#), 3.036 nm South)

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N35 01.17 W120 38.49 [Image 8708024](#) Jun 1987

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N35 01.05 W120 38.39 [Image 198630102](#) Nov 11 1986  
[Copyright © 2008 Kenneth & Gabrielle Adelman. All rights reserved.](#)



N35 01.25 W120 38.54 [Image 7940101](#) Fri May 4 12:52:00 1979  
Nearest caption: Oso Flaco Lake ([at image 7940097](#), 4768 ft North)

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N35 01.28 W120 38.46 [Image 7228005](#) 1972  
Nearest caption: Oso Flaco Lake (at [image 7227114](#) 4566 ft North)

*Kenneth & Gabrielle Adelman - Adelman@Adelman.COM*

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**From:** [Lauren Brown](#)  
**To:** [fw8plancomments@fws.gov](mailto:fw8plancomments@fws.gov)  
**Cc:** [michael\\_brady@fws.gov](mailto:michael_brady@fws.gov); "Bill Waycott"; [David H. Chipping](#)  
**Subject:** CNPS Comments on the GNDNWR CCP  
**Date:** Wednesday, April 13, 2016 7:14:56 PM  
**Attachments:** [CNPS-SLO GND CCP letter.docx](#)

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Please see the attached letter re: California Native Plant Society San Luis Obispo Chapter's comments on the Guadalupe Nipomo Dunes National Wildlife Refuge Comprehensive Conservation Plan.

Please feel free to contact me if you have any questions or require clarification. Thank you, Lauren Brown.

***Lauren Brown***

**California Native Plant Society**

**San Luis Obispo Chapter**

805-460-6329 (home); 805-570-7993 (cell)



April 13, 2016

To: Refuge Planner

Re: Guadalupe Nipomo Dunes CCP

2800 Cottage Way, W-1832

Sacramento, Ca 95825-1846

Dear Refuge Planner:

The California Native Plant Society (CNPS) San Luis Obispo (SLO) Chapter presents the following comments on the Guadalupe-Nipomo Dunes (GND) Draft Comprehensive Conservation Plan (CCP) and Environmental Assessment (EA) for your consideration. CNPS is a state-wide, non-profit organization dedicated to the conservation of California native plants and their natural habitats, and increasing the understanding and appreciation of native plants. The GND Complex is located within the CNPS SLO Chapter area, and our Chapter members have a long history of involvement with the GND, including publication of the Dune Mother's Wildflower Guide, monitoring of rare plant species, serving on the Dunes Collaborative Restoration Task Force, and organizing an annual hike to Coreopsis Hill, which is one of our most popular hikes. We appreciate this opportunity to learn what is being planned for the long-term management of the Refuge and to provide input/comments on the CPP.

The CNPS SLO Chapter fully supports the proposed management Alternative B (moderate increase in wildlife and habitat management, incremental increase in visitor services and environmental education). If budget considerations do not allow implementation of Alternative B, we would support Alternative A (no action), where the current level of management and public use opportunities are maintained. We strongly oppose Alternative C (minimal wildlife and habitat management and the Refuge is closed to the public), as written, for the following reasons:

- The GND Complex supports several rare and locally endemic plant species, including federal and state-listed plant species. We concur with the EA that the minimal level of monitoring and maintenance described in Alternative C is insufficient to ensure the continued existence of these species within the Refuge. The loss of a portion of the populations of some species could greatly affect the sustainability of the species within the GND complex. In addition, the location of the Refuge, which is essentially in the middle of the GND complex, is such that the loss of habitat or a segment of a population may result in isolating populations to the north or south, which could affect the sustainability of these populations.
- The presence of the highly invasive plant species veldt grass (*Ehrharta calycina*) is a very real threat to the rare and endemic plant species, unique plant communities and wildlife habitats both within the Refuge and the lands to the north and south of the Refuge. At a minimum, the current level of invasive plant species management at the Refuge should be continued to prevent the complete loss of the efforts that have been undertaken to date, and also to support

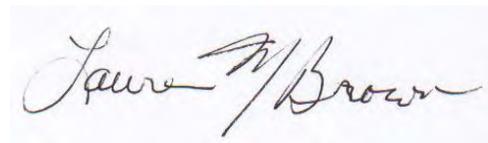
the weed control efforts that are ongoing on lands adjacent to Refuge, including the State Park lands to the north and Chevron's Guadalupe Restoration Project to the south. We concur with the findings of the EA that a decrease in the current level of invasive species management, as proposed in Alternative C, will increase the threat of invasive species to degrade and potentially destroy not only the plant species populations, plant communities, and wildlife habitat within the refuge, but also on the lands adjacent to the refuge.

- In addition to the invasive species known to be present on the Refuge, other invasive plant species are present in the GND that may not currently be present or problematic on the Refuge (such as, Russian wheat grass [*Thinopyrum junceiforme*], currently being treated on State Parks land, and Sahara mustard [*Brassica tournefortii*], present in the northernmost part of the GND). The development of an early detection and rapid response program, as described in Alternative B of the CCP, is essential to identify invasive species issues and removal or treatment initiated before they become a problem. At a minimum, there needs to be some level of monitoring to identify newly introduced invasive species. If found, these threats need to be removed before they become established on the Refuge and increase to the point where they not only affect the species, plant communities and wildlife habitat on the Refuge, but also the adjacent lands.
- Feral swine are an ongoing issue within the GND Complex. Managers on the properties surrounding the Refuge, including the agricultural lands, have been affected by feral swine and are actively engaged in feral swine control efforts. We are concerned that if Alternative C were implemented, the Refuge would become a place for feral swine to hide and thrive.

As stated above, our members have a long history of involvement with the GND and our primary concern with implementation of the CCP is the protection of the rare and endemic plant species and unique plant communities that occur in the GND. We also believe that having controlled public access (that does not impact the plants) is important to increase awareness and build public support to protect and preserve the GND and other places that are part of California's natural heritage. We wish to continue working with the USFWS to meet their goals, which are similar to ours, and thank you for the opportunity to provide comments on the GND Refuge CCP.

Please contact Lauren Brown (805-460-6329; [lbrown805@charter.net](mailto:lbrown805@charter.net)) if you have any questions or require clarification.

Sincerely,

A handwritten signature in black ink that reads "Lauren M. Brown". The signature is written in a cursive style with a large, stylized "L" and "B".

Lauren M. Brown  
California Native Plant Society  
San Luis Obispo Chapter  
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Atascadero, Ca 93422  
[lbrown805@charter.net](mailto:lbrown805@charter.net)