



## Coastal San Luis Resource Conservation District

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July 31, 2022

Ms. Jennifer Guetschow, Project Manager  
County of San Luis Obispo  
Department of Planning and Building  
San Luis Obispo, CA 93401

RE: Dana Reserve Specific Plan Draft Environmental Impact Report

Dear Ms. Guetschow:

The Coastal San Luis Resource Conservation District (CSLRCD) is a special district in San Luis Obispo County that provides information, support, and technical and engineering services to landowners and government agencies in the southwestern portion of San Luis Obispo County. We appreciate the opportunity to comment upon the Draft Environmental Impact Report (DEIR) on the Dana Reserve Specific Plan and project in Nipomo.

We will leave to others comments on the technical details of the project and its impacts as discussed in the DEIR. We are primarily concerned with two areas of impact of the project: these are the impacts upon the oak woodlands of the project site, and on the water supply. Our review leads us to suggest that a smaller project at that site could still accomplish many of its goals while conserving most of the site and its valuable habitats.

**Loss of Oak Woodland and Associated Habitat is Excessive.** County policies call for protection of the oak woodlands of the Nipomo area, yet this project proposes to destroy some 4,000 oak trees and associated habitat, including a rare local vegetation type known as Burton Mesa chaparral, in order to develop several hundred tract lots on the project site. We find such a vast gap between existing County policies and what is proposed to be very disappointing. While some losses may be unavoidable, it would appear that they could be much reduced and possible to mitigate for on-site with a project with a smaller footprint.

Having worked for years on habitat enhancement and restoration in the Oceano Dunes area, CSLRCD has first-hand knowledge of the challenges inherent in such efforts, especially as the scale of those efforts grows. In the case of Dana Reserve, the losses of the oak woodland and the so-called Burton Mesa chaparral would be extremely difficult to mitigate: such mitigation would require locating, purchasing, and successfully establishing an entirely new ecosystem somewhere on the Nipomo Mesa, presumably using propagules from the project site or at least nearby. We believe this to be unrealistic; a more reasonable and logical approach would be to preserve as much of the oak woodland and

associated habitat as possible on-site, and utilize other portions of the property for mitigation, which would be at a much smaller scale.

**Water Issues.** The DEIR appears to say that water is not really an issue for the project, as the Nipomo Community Services District (NCS D) would be the purveyor of water to the site, and it can purchase water from a supply in the Santa Maria area. The DEIR goes on to argue that the discharge from the local water treatment facility would help to recharge the local groundwater basin, so that there is no net loss of water to the basin as a result of the project. We are uncertain of this, and suggest further evaluation of this claim. This is because some years ago, CSLRCD was asked to look into a situation where a property owner along Nipomo Creek east of Highway 1 was seeking permission to draw water from the creek for use on his crops. A site visit showed that the creek had significant flow, which suggested strongly that water from the treatment facility (which was across the highway from the property in question) was percolating into the soil, hitting an impermeable or poorly permeable subsoil, and running eastward atop that layer but still underground, and surfacing in Nipomo Creek.

The Nipomo groundwater basin has been declining for years, and is considered to be in serious overdraft. We believe that further evaluation of the ultimate fate of water imported for the project is prudent and in the best interests of the Nipomo community.

**Recommendations.** It is recommended that the DEIR further evaluate the alternatives to the project to more carefully determine whether a smaller project can meet the goals stated therein while conserving the majority of the site.

Thank you for the opportunity to comment on the DEIR for this project.



Jackie Crabb, Executive Director  
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