



Oceano Dunes District
340 James Way, Suite 270
Pismo Beach, CA 93449

July 21, 2022

Jennifer Guetschow
San Luis Obispo County Department of Planning and Building
976 Osos St., Roomm 300,
San Luis Obispo, CA 93408

Subject: Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (DRSP)

Dear Ms. Guetschow,

These comments are submitted on behalf of the California Department of Parks and Recreation (State Parks), Oceano Dunes District, regarding the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (DRSP), herein referred to as the Project. State Parks appreciates this opportunity to provide comments regarding the DEIR.

State Parks is concerned that the DEIR does not sufficiently address the potential impacts to sustainable groundwater management of the Santa Maria Groundwater Basin (SMGB) and that continued groundwater pumping at current and/or increased levels will result in additional negative and cumulative impacts to sensitive wetland habitats and wetland dependent species, specifically within State Parks managed lands.

The Oceano Dunes District contains rare and diverse wildlife habitats and species many of which are dependent on an assemblage of wetlands, lagoons, and creeks influenced by the hydrology of the SMGB including lands within Nipomo Mesa Management Area (NMMA). These wetland features are already stressed from reduced groundwater levels resulting from chronic and seasonal groundwater overdraft and periodic drought. Multiple groundwater dependent dune slack wetlands within the Oceano Dunes District have disappeared or receded within recent years including Jack Lake, Lettuce Lake, and Surprise Lake. These and other affected wetlands have historically provided habitat for federally- and State- listed species including California red-legged frog (*Rana draytonii*), La Graciosa thistle (*Cirsium scariosum var. loncholepis*) and marsh sandwort (*Arenaria paludicola*). In addition, continuing the present amount of depletion of NMMA groundwater would likely contribute to further-reduced flows within both Oso Flaco Creek and Arroyo Grande Creek, resulting in additional wetland habitat loss including occupied habitat for federally and State listed tidewater goby (*Eucyclogobius newberryi*), steelhead (*Oncorhynchus mykiss*), California red-legged frog, and marsh sandwort.

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The DEIR states in Section 4.10.5 under HYD Impact 3 concerning groundwater that, “NMMA receives a minimum annual delivery volume of 2,500 AFY from the NSWSP [Nipomo Supplemental Water Project]” and that “there is more than sufficient water available to meet or exceed the needs of the project.” State Parks is concerned that this is inconsistent with the findings from the [Nipomo Mesa Management Area 14th Annual Report – Calendar Year 2021 \(Submitted April 2022\)](#) which states on Page ES-2 that, “Severe Water Shortage Conditions continue to exist in the NMMA in CY 2021 as indicated by the lowest Key Wells Index on record of 8.7 ft msl” and that only “1,064 AF of imported water were delivered through the NSWSP in CY 2021.”

Despite the SMGB court adjudication, it is clear from the Key Wells Index that the responses required under Severe Water Shortage Conditions have not been sufficient at reversing the groundwater depletion. State Parks is concerned that in addition to current level of groundwater extraction within the NMMA, lingering impacts from past groundwater extraction is resulting in severe depletion of groundwater supply, not only within the NMMA but also within the neighboring Northern Cities Management Area (NCMA) which directly, negatively impacts adjoining Arroyo Grande Creek and its tributary Los Berros Creek.

Under the Severe Water Shortage Condition that exists in the NMMA, no new demand should be added until this condition is permanently reversed. It is apparent that groundwater conditions are getting worse every year. Even if the Project does not require new groundwater pumping, as the DEIR claims, in order to protect essential wetland resources within the SMGB it is apparent that the NMMA needs to pump less groundwater in the future and instead use any additional NSWSP supply to make up for the recurring well-documented shortfall.

Thank you for the opportunity to submit comments for this DEIR. We look forward to working with San Luis Obispo County Department of Planning and Building and other partners to ensure that the environmental review fulfills the requirements of State and federal law so that essential wetland habitat will not be impacted.

You may follow up with Ben Wagner, Senior Environmental Scientist (Specialist) at ben.wagner@parks.ca.gov, or by phone at (805) 574-4587.

DocuSigned by:
Kevin Pearce
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Kevin Pearce,
Acting District Superintendent