



Ideas + Action for a Thriving Central Coast

12 March 2021

Honorable Steve Padilla
California Coastal Commission
45 Fremont Street #1900
San Francisco, CA 94105

Subject: March 18, 2021 Hearing on Oceano Dunes Coastal Development Permit 4-82-300 Review

Dear Chair Padilla and Commissioners:

We are writing to request that any decision about the future of the Oceano Dunes State Park be made with credible data and analysis and appropriate local representation on the Commission.

By way of background, REACH is a nonprofit, economic impact organization with a mission to increase economic prosperity on the Central Coast through big thinking, bold action and regional collaboration. Led by the private sector, the organization works in partnership with business, education, government and nonprofit partners to solve the region's most pressing economic challenges in order to establish the Central Coast as a place where current and future generations have the opportunity to thrive. Our organization is focused on ideas and action to create a thriving Central Coast. It is in this spirit that we write to you, today.

We recognize and appreciate the long history of the State Vehicle Recreation Area (SVRA) and Off-Highway Vehicle activities at the Oceano Dunes, as well as the strong opinions and interests on both sides of this issue. At this hearing, our organization is not advocating for either side of this issue, because we do not believe sufficient fact gathering and analysis have been conducted to make an informed decision. To that end, prior to making a decision, we request that the Commission ensure decision-quality analysis is produced to ensure both environmental and economic impacts are independently and objectively understood in a manner consistent with the mission of the Coastal Commission, which is to make decisions through "careful planning, rigorous use of science, strong public participation, education and effective intergovernmental coordination."

The following four items are of concern for the South Central District and we request you give careful consideration and action prior to a decision:

1) **Ensure local representation in this decision**

The South Central seat on the Commission is vacant. This decision is significant for our region and should not be made without a seated representative for our South Central District. We believe strong public participation can only be achieved when our district is represented by an appointee who has been elected to public office by South Central District residents.

2) **Ensure there is an independent, objective and accurate economic impact analysis conducted (impacts on direct, indirect, induced and tax revenue fiscal implications)**

To enable informed decision-making, an independent economic impact analysis is needed that details the current impacts and outputs, as well as modeling for potential future alternative uses impacts. Economic impacts are a significant driver of economic output, not only for the Central Coast, but for California. It's not simply loss of revenue, or a potential reduction of visitors and the induced impacts they create—it's the local context within which such an impact will occur. At this time, San Luis Obispo County is wrestling with three very significant challenges that should be considered:

1. First, Oceano is a majority 51% Hispanic/Latinx community and median household income is 11% lower than the rest of the county. Oceano is also a state and federal recognized Opportunity Zone, due to underperformance in key achievement and quality of life metrics. It is not understood what the impacts of a closure of the Dunes would be to this community, or what economic alternatives there may be to continue to support the local community. We ask that the Coastal Commission evaluate the impacts to the surrounding community making every effort to ensure participation is accessible to a Spanish-speaking population.
2. Second, the county's largest and highest-paying private employer, PG&E, is closing Diablo Canyon Nuclear Power Plant in 2025, the same timeframe that the staff report proposes to close the State Park to OHV. For a larger metro, the loss of a single employer and shift in a State Park Use Policy would likely have little impact. However, in our small, rural county, the combined impacts will be significant and should not be taken lightly.
3. Third, while we're all very thankful for falling COVID-19 case numbers and vaccinations to help us achieve herd immunity, we have yet to start the recovery process from the devastating impacts of the pandemic. Recovery will be required in most every aspect of our lives, not the least of which will be economic. Tourism is a significant part of our regional economy, making up nearly \$2B or about 15% of the county GDP.

We will need every visitor resource and attraction in the coming years, or the consequence will, self-evidently, be a slower recovery.

3) **Meaningful public participation from the surrounding impacted community**

Strong public participation is a priority for the Coastal Commission, and it should be inclusive and meaningfully solicit the participation of the community most impacted, not just those most vocal and able to engage in a process designed to favor their participation (this includes vocal advocates on both sides of the closure issue).

To that end, the community of Oceano should provide input into the process, proportional to its majority Hispanic/Latinx population. The process has missed the spirit and intent of the Coastal Act which states in Section 30107.3:

- (a) *“Environmental justice” means the fair treatment and meaningful involvement of people of all races, cultures, and incomes and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.”* (b) *“Environmental justice” includes, but is not limited to, all of the following:*
- a. *(1) The availability of a healthy environment for all people.*
 - b. *(2) The deterrence, reduction, and elimination of pollution burdens for populations and communities experiencing the adverse effects of that pollution, so that the effects of the pollution are not disproportionately borne by those populations and communities.*
 - c. *(3) Governmental entities engaging and providing technical assistance to populations and communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decision making process.*
 - d. *(4) At a minimum, the meaningful consideration of recommendations from populations and communities most impacted by pollution into environmental and land use decisions.*

Although the staff report references “Environmental Justice” 62 times, we believe the spirit of the definition as defined by the Coastal Act has not been followed. Without a thorough understanding of the impacts, and recommendations of the adjacent impacted community a conclusion cannot be drawn. Along these lines, we are concerned that the Coastal Commission does not provide adequate Spanish translation of its proceedings--such as instructions for comment and public participation, staff reports and exhibits. Without these basic tools, a majority of the residents in the community where this decision would be most acutely felt are

disenfranchised. Alternatively, proactive outreach through polling or surveying a sample of this population could be an effective tool in gaining input.

4) Rigorous use of science and due process surrounding the air quality and other environmental impacts

It is important to consider established process and careful planning surrounding this decision. The Commission previously requested State Parks address and mitigate a variety of items in their Public Works Plan (PWP). A draft PWP was only recently completed, and it should be formally responded to first. We encourage the Commission to complete the process required by the California Environmental Quality Act.

We hope our letter conveys our thoughtful and sincere perspective, and desire to advocate for the right and just outcomes for our community. The issue of OHV at the Oceano Dunes is like many other issues—they are highly local and must therefore be considered in the context of our local community. Please wait until an elected member of our community is appointed to the Commission; direct staff to independently assess economic impacts of closure to OHV uses and modeling of alternative uses; and complete PWP process to formally determine which environmental impacts can/cannot be mitigated.

Thank you for your time and consideration.

Sincerely,



Melissa James
President/CEO
REACH