

FINAL MITIGATED NEGATIVE DECLARATION

PROJECT: **Piedras Blancas California Coastal Trail Project, SCH# 2024090173**

LEAD AGENCY: **Department of Parks and Recreation**

AVAILABILITY OF DOCUMENTS

The Initial Study for this Mitigated Negative Declaration was made available throughout the 30-day public review period, which was extended to a total of 52 days, at the San Luis Obispo Coast District's Coast District Office in San Simeon, the Morro Bay Sector office, the Northern Service Center in Sacramento, and the San Luis Obispo County Cambria and San Luis Obispo libraries. It was also available on DPR's website (www.parks.ca.gov). The Final Mitigated Negative Declaration and all supporting materials will be available, by request, at DPR's Northern Service Center.

PROJECT DESCRIPTION:

This project includes the proposed Piedras Blancas segment of the California Coastal Trail located approximately 9 miles north of Old San Simeon Village. The Piedras Blancas Coastal Trail Project (PBCT) consists of 4.2 miles of accessible trail including boardwalks, bridges, and compacted gravel surface. The width of trail will vary between 4 and 5 feet and total approximately 2.5 acres once its constructed. Construction of the PBCT will result in approximately 9.5 acres of total disturbance which includes temporary impacts as a result of staging and stockpiling and temporary vegetation disturbance. The PBCT would be located west of Highway 1 and would extend north from the elephant seal boardwalk at Caltrans Vista Point 4 parking lot to the Arroyo de la Cruz parking lot and trailhead.

FINDINGS

An Initial Study has been prepared to assess the proposed project's potential impacts on the environment and the significance of those impacts and is incorporated in the Draft MND. Based on this Initial Study, it has been determined that the proposed project would not have any significant impacts on the environment, once all proposed mitigation measures have been implemented. This conclusion is supported by the following findings:

- There was no potential for adverse impacts on Aesthetics, Agricultural and Forest Resources, Energy, Greenhouse Gas Emissions, Population and Housing, Public Services, Transportation, and Utilities and Service Systems associated with the proposed project.
- Potential adverse impacts resulting from the proposed project were found to be less than significant in the following areas: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Recreation, Tribal and Cultural Resources, and Wildfire.
- Full implementation of the proposed mitigation measures included in this MND would reduce potential project-related adverse impacts on Biological Resources, Land Use and Planning, and Recreation to a less than significant level.

MITIGATION MEASURES

The following mitigation measures have been incorporated into the scope of work for the Piedras Blancas California Coastal Trail and will be fully implemented by DPR to avoid or minimize adverse environmental impacts identified in this MND. These mitigation measures will be included in contract specifications and instructions to DPR personnel involved in implementing the project.

AESTHETICS

- No mitigation measures required

AGRICULTURAL RESOURCES

- No mitigation measures required

AIR QUALITY

- No mitigation measures required

BIOLOGICAL RESOURCES

MITIGATION MEASURE BIOMM-1

Impacts to coastal prairie and cobwebby thistle will be mitigated on-site and/or off-site at a ratio agreed upon with regulatory permitting agencies.

MITIGATION MEASURE BIOMM-2

Impacts to wetlands will be mitigated on-site and/or off-site at a ratio agreed upon with regulatory permitting agencies.

MITIGATION MEASURE BIOMM-3

The Conceptual Mitigation Monitoring & Reporting Plan outlines where mitigation will occur, define success criteria, outline maintenance actions, and identify contingency measures and/or adaptive management actions if initial restoration efforts do not meet success criteria.

CULTURAL RESOURCES

- No mitigation measures required

GEOLOGY AND SOILS

- No mitigation measures required

HAZARDS AND HAZARDOUS MATERIALS

- No mitigation measures required

HYDROLOGY AND WATER QUALITY

- No mitigation measures required

LAND USE AND PLANNING

MITIGATION MEASURE BIOMM-2

Impacts to wetlands will be mitigated on-site and/or off-site at a ratio agreed upon with regulatory permitting agencies.

MINERAL RESOURCES

- No mitigation measures required

NOISE

- No mitigation measures required

POPULATION AND HOUSING

- No mitigation measures required

PUBLIC SERVICES

- No mitigation measures required

RECREATION

MITIGATION MEASURE BIOMM-2

Impacts to wetlands will be mitigated on-site and/or off-site at a ratio agreed upon with regulatory permitting agencies.

TRANSPORTATION/TRAFFIC

- No mitigation measures required

TRIBAL CULTURAL RESOURCES

- No mitigation measures required

UTILITIES AND SERVICE SYSTEMS

- No mitigation measures required

WILDFIRE

- No mitigation measures required

Errata Sheet for the Piedras Blancas California Coastal Trail Initial Study/MND

The following corrections, additions, and deletions have been made to the Piedras Blancas California Coastal Trail Draft MND and are incorporated into the original document by way of this Errata Sheet. Additions and corrections are underlined; strikeout indicates a deletion.

Overview Map, Figure PROJ-2, page 4: This figure has been revised to clearly show which portion of the trail is permitted and which portion is not yet permitted.

2.6 Project Description, page 12:

- The following clarification is incorporated to this section for clarification: The southern portion of the trail which is not tied to Caltrans' CDP is partially constructed and existing. The Project will modify this portion of the trail so that it conforms with the DPR Trails Handbook and the Accessibility Handbook and will not require breaking new ground.

III Air Quality, page 36:

The following information has been added to this section for clarification: The northern portion of the Project is covered by the CDP that authorized Caltrans' Highway 1 Realignment Project. The environmental review and permitting process for that portion of the Project included an Initial Site Assessment prepared in 2008 which determined that the area is void of ultra basic and serpentine rocks and therefore encountering naturally occurring asbestos (NOA) is unlikely (California Department of Transportation, 2010). The southern mile of the Project is not yet permitted and was not included in the analyses for the northern portion of the Project; however, both the northern and southern portions of the trail occur within the same marine terrace deposit soil type, and NOA is not expected to occur within this soil type. Additionally, the southern portion consists of a trail that already exists; the Project would modify the trail so that it conforms with DPR standards, but new construction or earth disturbance to create a trail is not required.

Table PROJ-5: Project Requirements, page 14; IV Biological Resources, page 66; Chapter 5 Summary of Standard Project Requirements and Mitigation Measures, page 183:

Standard Project Requirements for BIOR have been revised to clarify who will implement the requirements and when. Additional Requirements have been added to include burrowing owl surveys (BIOR-5 d) and nesting bird surveys (BIOR-5 e).

STANDARD PROJECT REQUIREMENTS

BIOR-1: Environmentally Sensitive Areas

Environmentally Sensitive Areas will be demarcated by a DPR Environmental Scientist prior to construction work activities, including staging and stockpiling. All work personnel and vehicles/equipment will avoid those areas.

BIOR-2: Environmental Awareness Training

A Worker environmental awareness program (WEAP) will be provided by a DPR Environmental Scientist for all work personnel prior to the onset of work activities, including staging and stockpiling. The WEAP will incorporate all related mitigation measures and condition requirements for the Project.

BIOR-3: Best Management Practices

- a) Prior to the start of on-site construction work activities, DPR Environmental staff will conduct an additional survey of the Project area for sensitive species.
- b) To prevent the spread of noxious weeds, all construction vehicles and equipment will enter and leave the Project site free of soil, vegetative matter or other debris that could contain weed seeds.
- c) All construction will be consistent with the State Parks Trail Manual guidelines.
- d) DPR Environmental staff will monitor Project construction activities on a regular basis to ensure that impacts to natural resources are minimized consistent with the Project's Conceptual Mitigation Monitoring and Reporting Plan

BIOR-4: Plants

- a) If special status plant species are located within 50 feet of the project area, the occurrences will be flagged by the DPR Environmental staff, fenced off prior to the start of on-site construction activities, and completely avoided. The contractor is responsible for ensuring that all fencing remains intact for the duration of construction activities.
- b) To maintain genetic integrity, restoration efforts will use seed/stock collected from the Project site and/or the local area by DPR Environmental staff.

BIOR-5: Wildlife

- a) Construction of boardwalks and bridges must occur during the summer months when wetlands and waterways are at their driest to avoid potential impacts to amphibians and reptiles.
- b) A qualified biological monitor will survey for California red-legged frogs prior to work near the locations where this species has been found. Through the regulatory permit process, additional measures to reduce and/or avoid impacts to State listed, federally listed, and/or sensitive species will be incorporated into construction activities.
- c) Construction of the trail must occur in the summer months prior to September to avoid potential impacts to burrowing owls and California red-legged frogs.

- d) A qualified biologist(s) must conduct surveys for burrowing owls in accordance with the referenced “Burrowing Owl Survey Protocol and Mitigation Guidelines,” the survey season immediately prior to construction. DPR will contact CDFW if burrowing owls are found within the Project site during surveys or at any point during ground disturbing activities for guidance on the development of avoidance and minimization measures.
- e) A qualified biologist(s) must conduct nesting bird surveys no more than 10 days prior to the start of ground or vegetation disturbance if work occurs during the nesting season, February 1 – September 15.

Table BIO-1, Page 42: The text in the last column for *Carex obispoensis* was cut off. The Rationale section should read: “No impact. While the plant occurs in the nearby area (north of Arroyo de la Cruz and east of Hwy 1) no plants are found within the Project area.”

Regional Water Quality Control Board, Page 52: The following information is incorporated to this section as the last sentence: Additionally, the Central Coast Water Board regulates impacts to riparian areas since protection of riparian areas is critical to protection of beneficial uses of waters of the state.

Wetlands, Page 62: The following analysis is incorporated into this section between the two existing paragraphs:

To determine potential permanent impacts as a result of boardwalks and bridges, DPR staff conducted site visits to the Moonstone Boardwalk in Cambria and the Marina Boardwalk in Morro Bay. The Moonstone Boardwalk was reconstructed in 2023-2024, so the areas impacted by construction are still recovering and wetland vegetation has filled in on both sides of the boardwalk and has currently extended one foot under the west side of the boardwalk. However, the wetland vegetation is continuing to reestablish and recruit into the disturbed area, as rhizomes continue to get nutrients, and the wetland plants have survived translocation. It is anticipated that this area will continue to fill in over the next year. Because it was constructed in 2023 and impacts can still be detected, we are using the Moonstone Boardwalk to anticipate temporary impacts as a result of construction to wetlands and riparian habitat; we anticipate that the wetland and riparian habitat will take approximately 1.5 to 2 years to reestablish. The total area that will be impacted by the new 5-foot-wide bridges and boardwalks, based on Project plans, is shown in Table 1.

Table 1: Total Area of Boardwalks and Bridges

Feature	Linear Feet	Square Feet	Acreage
Boardwalks	2,906	14,530	0.33
Bridges	225	1,125	0.023
TOTAL			0.35 acre

The boardwalks and bridges will occupy a total of 0.35 acre.

It is anticipated that 5 feet on either side of the boardwalks and bridges will be cleared and grubbed to facilitate construction. This is likely a high estimate. Staging and stockpiling will occur in existing

parking lots; therefore, no impacts to habitat are anticipated to result from staging and/or stockpiling.

Table 2: Anticipated Temporary Impacts from Clearing and Grubbing within Jurisdictional Areas

Feature	Total Area of Feature (square feet)	Area of clearing/grubbing (square feet)	Temporary Disturbance (acres)
Boardwalks	2,906 x 5 = 14,530	2,906 x 10 = 29,060	1 .0
Bridges	225 x 5 = 1,125	1,125 x 10 = 11,250	0.26
TOTAL			1.26 acre

The total area anticipated to be temporarily impacted as a result of clearing and grubbing 1.26 acre.

The Marina Boardwalk was constructed approximately 10 years ago. Although the boardwalk is not the same width as the Moonstone or proposed CCT Boardwalk, it is the same height (2 feet high) and was constructed in the same manner, with the same pier design. The Marina Boardwalk is 4-feet wide and the wetland vegetation, primarily pickleweed (*Salicornia pacifica*), has established under the boardwalk on both sides, with the exception of an 18-inch strip of grass where the shading from the boardwalk prevents the reestablishment of wetland vegetation. The remaining area has filled in with wetland vegetation, likely due to the presence of water and the fact that the shade from a boardwalk allows water or moisture to remain longer. Additionally, many of the wetland species spread by rhizomes which quickly recruit and fill in areas after disturbance. We are using this boardwalk to anticipate permanent impacts to wetlands and riparian areas as a result of the CCT boardwalks.



Figure 1: Blue line indicates 18" wide area where wetland vegetation has not established under the Marina Boardwalk

The CCT boardwalks and bridges will be 5-feet wide to meet ADA requirements and will be the same height as the Marina Boardwalk, 2 feet high. To determine the area of permanent impacts as a result of shading of wetland and/or riparian habitat, we used a proportion based on the given relationship. $\text{Impacts/ Width} = \text{Constant}$

Width: 4 feet = 48 inches

Impact Area: 18 inches

Ratio = $18/48 = 0.375$

Using the same ratio for a 5-foot-wide boardwalk or bridge (5 feet = 60 inches): Impact Area = $60 \times 0.375 = 22.5$ inches

Therefore, a 5-foot-wide bridge or boardwalk is anticipated to result in 22.5 inches of permanent impacts as a result of shading to wetland and/or riparian habitat.

To calculate the total impacts caused by 2,906 linear feet of a 5-foot boardwalk, convert the width from inches to feet:

1 foot = 12 inches

22.5 inches = $22.5/12 = 1.875$ feet

The impacted area width is 1.875 feet, and the boardwalk length is 2,906 feet. Therefore, total permanent impacts are:

Area = Length \times Impact Width = $2,906 \times 1.875$

Area = 5,448.75 square feet

Table 3: Total Anticipated Impacts as a result of Shading Resulting from Boardwalks and Bridges

Feature	Linear Feet	Square Feet	Acreage
Boardwalks	2,906	5,448.75	0.125
Bridges	225	421.875	0.0097
TOTAL			0.13 acre

The total area anticipated to be permanently impacted by shade from boardwalks is 5,448.75 square feet, or 0.125 acre. The total area anticipated to be permanently impacted by shade from bridges is 421.875 square feet, or 0.0097 acre. Boardwalks will sit on top of permanent piers which are considered permanent impacts within jurisdictional areas. Permanent impacts as a result of piers are analyzed below. For the purposes of this MND, it is assumed that bridge pilings and/or piers will be constructed outside of jurisdictional areas; however, if final design plans show otherwise, the below analysis will be updated to include those impacts to update documentation for regulatory permit applications.

DPR boardwalk specifications require no more than 8 feet between piers; a total of 2,906 linear feet of boardwalk would require 728 piers. Each pier measures 13 inches by 14 inches. To calculate total acreage impacted by piers:

$13 \times 14 = 182$ square inches

$728 \times 182 = 132,896$ square inches

There are 144 square inches in a square foot; $132,896/144 = 923.56$ square feet

Since 1 acre = 43,560 square feet = $923.56/43,560 = 0.0212$ acre

The boardwalk piers will result in 0.02 acre of permanent impacts.

Table 4: Anticipated Impacts to Jurisdictional Areas

Feature	Permanent Impacts to wetland & riparian habitat (acres)
Boardwalks	0.125
Bridges	0.0097
Piers	0.02
TOTAL	0.15 acre

DPR is proposing a 1:1 mitigation ratio for temporary impacts and a 3:1 mitigation ratio for permanent impacts.

Table 5: Proposed Mitigation Ratios to offset Temporary and Permanent Impacts

Feature	Mitigation Ratio for Temporary Impacts (1:1)	Mitigation Ratio for Permanent Impacts (3:1)
Boardwalks	1.0	0.38 acre
Bridges	0.26	0.03 acre
Piers	N/A included in boardwalk measurement	0.06
	1.26 acre	0.47 acre

As shown in Table 5, a total of 1.26 acres is proposed to be restored and/or enhanced by DPR to offset temporary impacts to jurisdictional areas and 0.47 acre is proposed to be mitigated onsite to offset permanent impacts.

Temporary Impacts

Temporary impacts within jurisdictional areas as a result of clearing and grubbing will be restored post-project by DPR staff via seeding with locally obtained seed from the project site and/or planted with native species collected on-site. However, if all temporarily impacted areas cannot be restored in place, immediately adjacent to the boardwalks and bridges, the on-site mitigation areas, described below, have been increased to account for an additional 0.20 acre.

Permanent Impacts

A total of 0.47 acre is required to be restored; however, a total of 0.55 acre is proposed for restoration to offset potential unsuccessful restoration efforts (e.g., loss of planted stock, unsuccessful seeding, etc.). The majority of the impacts will occur as a result of boardwalks within wetland habitat; therefore, 0.5 acre of wetland habitat will be restored and the remaining 0.05 acre of restoration will occur within riparian habitat, as described below.

VII Geology and Soils, page 111:

Reference to bioswales was removed: Implementation of Best Management Practices (BMPs) will be utilized to minimize erosion and to contain sediments within the project site. BMPs will include bioswales and straw waddles.

VII Geology and Soils, page 112:

Reference to bioswales was removed: Erosional impacts will not be exacerbated due to Project design features including use of permeable compacted road base, sustainable trail designs that do not impede sheet flow, along with the implementation of BMPs such as ~~bioswales~~ and straw waddles.

Tribal Cultural Resources, page 168:

- CULT-4 Monitoring requirement has been revised to specify who decides when monitoring is necessary. The requirement now reads:

SPR CULT-4: Monitoring: Archaeological and Native American tribal monitoring will be required for any project excavations that occur within existing archaeological site boundaries or immediately adjacent to intact archaeological resources. The yak titʻu titʻu yak tithini Northern Chumash tribe, the Salinan Tribe of Monterey and San Luis Obispo Counties and the Xolon Salinan Tribe will be contacted to provide monitoring for any portion of the project requiring tribal monitoring.

Chapter 6 References

Correction to provide full reference which was missing (page 191): California Department of Transportation. 1992. Historic Property Survey Report, Request for Determination of Eligibility, and Preliminary Evaluation of Effects for the Proposed Realignment of Highway 1 near San Simeon, San Luis Obispo County, California. 05-SLO-1 P.M. 61.3/63.2 05252 343600. San Luis Obispo, California.

New citation to support III Air Quality discussion (pg 36): California Department of Transportation. 2010. Final Environmental Impact Report with Finding of No Significant Impact. Piedras Blancas Realignment.

Appendices

Correction to add the following missing appendices:

- Appendix A. Typical Construction Plans
- Appendix B. CDP 3-13-012
- Appendix G. Conceptual Mitigation Monitoring and Reporting Plan

Conceptual MMRP Revisions

Section 1.1.2, Arroyo Willow Riparian Habitat, page 6:

- Include the following after the second sentence of paragraph 1: Additionally, the Central Coast Water Board regulates impacts to riparian areas since protection of riparian areas is critical to protection of beneficial uses of Waters of the State.

Anticipated Impacts to Jurisdictional Areas, Wetlands, page 9:

- Incorporate this sentence as the first under Wetlands: The Central Coast Water Board identifies wetlands as (1) an area that has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and 3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation. Additionally, the Central Coast Water Board regulates impacts to riparian areas since protection of riparian areas is critical to protection of beneficial uses of Waters of the State.
- Revise the second sentence under Wetlands to read: The Project crosses approximately 0.33 acre of wetlands; however, permanent impacts will ~~only~~ occur where individual piers that support the boardwalks are constructed within the wetlands, as well we where the shade as a result of the boardwalks prevents wetland vegetation from becoming established.
- Revise the last sentence under Wetlands to read: Consultation with permitting agencies will determine final impacts and mitigation ratios, but DPR is proposing to offset impacts to wetlands at a ratio agreed upon with regulatory permitting agencies (e.g., 3:1).

Anticipated Impacts to Jurisdictional Areas, Arroyo Willow Riparian Habitat, page 9:

- Include the following after the last sentence of this paragraph: The mitigation must match impacted habitat function.
- Include the following after the above last sentence of this section: The revegetation efforts to offset impacts to riparian habitat will include species within the impacted area and will be out planted at a ratio agreed upon with the regulatory agencies (i.e., 3:1). The species and acreage proposed as mitigation to offset impacts to riparian habitat must mirror the habitat function of the riparian area impacted to reduce impacts to a less than significant level.

Anticipated Impacts to Jurisdictional Areas, page 10:

Below the first paragraph and above the On-site Mitigation section, the following additional information has been included to clarify potential impacts to jurisdictional areas.

Table 6: Total Area of Boardwalks and Bridges

Feature	Linear Feet	Square Feet	Acreage
Boardwalks	2,906	14,530	0.33
Bridges	225	1,125	0.023
TOTAL			0.35 acre

The boardwalks and bridges will occupy a total of 0.35 acre.

It is anticipated that 5 feet on either side of the boardwalks and bridges will be cleared and grubbed to facilitate construction. This is likely a high estimate. Staging and stockpiling will occur in existing parking lots; therefore, no impacts to habitat are anticipated to result from staging and/or stockpiling.

Table 7: Anticipated Temporary Impacts from Clearing and Grubbing within Jurisdictional Areas

Feature	Total Area of Feature (square feet)	Area of clearing/grubbing (square feet)	Temporary Disturbance (acres)
Boardwalks	$2,906 \times 5 = 14,530$	$2,906 \times 10 = 29,060$	1.0
Bridges	$225 \times 5 = 1,125$	$1,125 \times 10 = 11,250$	0.26
TOTAL			1.26 acre

The total area anticipated to be temporarily impacted as a result of clearing and grubbing 1.26 acre.

Table 8: Total Anticipated Impacts as a result of Shading Resulting from Boardwalks and Bridges

Feature	Linear Feet	Square Feet	Acreage
Boardwalks	2,906	5,448.75	0.125
Bridges	225	421.875	0.0097
TOTAL			0.13 acre

The total area anticipated to be permanently impacted by shade from boardwalks is 5,448.75 square feet, or 0.125 acre. The total area anticipated to be permanently impacted by shade from bridges is 421.875 square feet, or 0.0097 acre. Boardwalks will sit on top of permanent piers which are considered permanent impacts within jurisdictional areas. Permanent impacts as a result of piers are analyzed below. For the purposes of this MND, it is assumed that bridge pilings and/or piers will be constructed outside of jurisdictional areas; however, if final design plans show otherwise, the below analysis will be updated to include those impacts to update documentation for regulatory permit applications.

DPR boardwalk specifications require no more than 8 feet between piers; a total of 2,906 linear feet of boardwalk would require 728 piers. Each pier measures 13 inches by 14 inches. To calculate total acreage impacted by piers:

$13 \times 14 = 182$ square inches

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There are 144 square inches in a square foot; $132,896 / 144 = 923.56$ square feet

Since 1 acre = 43,560 square feet = $923.56 / 43,560 = 0.0212$ acre

The boardwalk piers will result in 0.02 acre of permanent impacts.

Table 9: Anticipated Impacts to Jurisdictional Areas

Feature	Permanent Impacts to wetland & riparian habitat (acres)
Boardwalks	0.125
Bridges	0.0097
Piers	0.02
TOTAL	0.15 acre

DPR is proposing a 1:1 mitigation ratio for temporary impacts and a 3:1 mitigation ratio for permanent impacts.

Table 10: Proposed Mitigation Ratios to offset Temporary and Permanent Impacts

Feature	Mitigation Ratio for Temporary Impacts (1:1)	Mitigation Ratio for Permanent Impacts (3:1)
Boardwalks	1.0	0.38 acre
Bridges	0.26	0.03 acre
Piers	N/A included in boardwalk measurement	0.06
	1.26 acre	0.47 acre

As shown in Table 5, a total of 1.26 acres is proposed to be restored and/or enhanced by DPR to offset temporary impacts to jurisdictional areas and 0.47 acre is proposed to be mitigated onsite to offset permanent impacts.

Temporary Impacts

Temporary impacts within jurisdictional areas as a result of clearing and grubbing will be restored post-project by DPR staff via seeding with locally obtained seed from the project site and/or planted with native species collected on-site. However, if all temporarily impacted areas cannot be restored in place, immediately adjacent to the boardwalks and bridges, the on-site mitigation areas have been increased to account for an additional 0.20 acre.

Permanent Impacts

A total of 0.47 acre is anticipated to be required to be restored; however, a total of 0.55 acre is proposed for restoration to offset potential unsuccessful restoration efforts (e.g., loss of planted stock, unsuccessful seeding, etc.).

Off-site Mitigation, page 10:

Revise the sentence to read: ~~If there is not enough suitable habitat on-site for mitigation, off-site mitigation will occur south of the PBCT between the southern terminus of the Project and San Simeon Point on State Park property.~~ The following two (2) sites have been identified for off-site mitigation should acreage be required to satisfy regulatory permitting requirements, and are depicted in Figure 1, below.

0.50-acre wetland mitigation site

This mitigation site sits on Concepcion loam soils which is characterized by poor drainage. This poor drainage leads to seasonal inundation during the wet season with an unnamed drainage northwest of Arroyo del Oso serving as a water source to inundate this wetland site. The site is directly adjacent to previous mitigation sites that were completed by Caltrans as part of the Highway 1 realignment project. While most of the site is now dominated by nonnative plant species including rattlesnake grass (*Briza maxima*), wild radish (*Raphanus sativus*), and English plantain (*Plantago lanceolata*) there is also native vegetation indicative of a wetland drainage area including wild rye (*Elymus condensatus*) and western rush (*Juncus occidentalis*). Restoration efforts at this mitigation would include lightly contouring the site to provide for better pooling from the associated drainage during the wet season and to prevent runoff and planting the entirety of the site with locally sourced wetland plant or seed stock.

0.05-acre riparian mitigation site

This mitigation site is located at Arroyo del Oso, an intermittent creek that flows through the coastal trail project site. The mitigation area will be directly adjacent to a bridge feature that will be built over the creek. The site includes a soil profile of Cropley clay and San Simeon sandy loam which are both poorly drained soils allowing for inundation of the creek channel during the wet season. The existing condition of the site includes native wetland and riparian vegetation that could be enhanced with further planting of present species including willow stakes (*Salix lasiolepis*), California gray rush (*Juncus patens*), and silver cinquefoil (*Potentilla anserina*) to create higher densities and help compete with encroachment of nonnative species.

Figure 1, page 10: Insert Figure 1 which shows the two potential sites for offsite mitigation below “0.05-acre riparian mitigation site.”

Avoidance, Minimization, and Mitigation Measures, page 11:

Standard Project Requirements for BIOR have been revised to clarify who will implement the requirements and when. Additional Requirements have been added to include burrowing owl surveys (BIOR-5 d) and nesting bird surveys (BIOR-5 e).

STANDARD PROJECT REQUIREMENTS

BIOR-1: Environmentally Sensitive Areas

Environmentally Sensitive Areas will be demarcated by a DPR Environmental Scientist prior to construction work activities, including staging and stockpiling. All work personnel and vehicles/equipment will avoid those areas.

BIOR-2: Environmental Awareness Training

A Worker environmental awareness program (WEAP) will be provided by a DPR Environmental Scientist for all work personnel prior to the onset of work activities, including staging and stockpiling. The WEAP will incorporate all related mitigation measures and condition requirements for the Project.

BIOR-3: Best Management Practices

- e) Prior to the start of on-site construction work activities, DPR Environmental staff will conduct an additional survey of the Project area for sensitive species.
- f) To prevent the spread of noxious weeds, all construction vehicles and equipment will enter and leave the Project site free of soil, vegetative matter or other debris that could contain weed seeds.
- g) All construction will be consistent with the State Parks Trail Manual guidelines.
- h) DPR Environmental staff will monitor Project construction activities on a regular basis to ensure that impacts to natural resources are minimized consistent with the Project's Conceptual Mitigation Monitoring and Reporting Plan

BIOR-4: Plants

- c) If special status plant species are located within 50 feet of the project area, the occurrences will be flagged by the DPR Environmental staff, fenced off prior to the start of on-site construction activities, and completely avoided. The contractor is responsible for ensuring that all fencing remains intact for the duration of construction activities.
- d) To maintain genetic integrity, restoration efforts will use seed/stock collected from the Project site and/or the local area by DPR Environmental staff.

BIOR-5: Wildlife

- f) Construction of boardwalks and bridges must occur during the summer months when wetlands and waterways are at their driest to avoid potential impacts to amphibians and reptiles.
- g) A qualified biological monitor will survey for California red-legged frogs prior to work near the locations where this species has been found. Through the regulatory permit process, additional measures to reduce and/or avoid impacts to State listed, federally listed, and/or sensitive species will be incorporated into construction activities.
- h) Construction of the trail must occur in the summer months prior to September to avoid potential impacts to burrowing owls and California red-legged frogs.
- i) A qualified biologist(s) must conduct surveys for burrowing owls in accordance with the referenced "Burrowing Owl Survey Protocol and Mitigation Guidelines," the survey season immediately prior to construction. DPR will contact CDFW if burrowing owls are found

within the Project site during surveys or at any point during ground disturbing activities for guidance on the development of avoidance and minimization measures.


- j) A qualified biologist(s) must conduct nesting bird surveys no more than 10 days prior to the start of ground or vegetation disturbance if work occurs during the nesting season, February 1 – September 15.

Monitoring Schedule, page 15:

Change first sentence to read: For a ~~three~~ five-year period, DPR will perform annual monitoring and will submit annual reports to the regulatory agencies.

This document, along with the Draft Initial Study/Mitigated Negative Declaration (SCH#2024090173), corrected as noted above; Comments and Response to Comments; Conceptual Mitigation Monitoring and Reporting Plan; and the Notice of Determination, constitute the Final Mitigated Negative Declaration for the Piedras Blancas California Coastal Trail Project.


Pursuant to Section 21082.1 of the California Environmental Quality Act, the California Department of Parks and Recreation (DPR) has independently reviewed and analyzed the Initial Study and Negative Declaration for the proposed project and finds that these documents reflect the independent judgement of DPR. DPR, as a lead agency, also confirms that the project mitigation measures detailed in these documents are feasible and will be implemented as stated in the Negative Declaration.

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5/30/2025

Dan Osanna for Brad Michalk
Environmental Coordinator
Northern Service Center

Date

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5/30/2025

Dan Falat
District Superintendent
San Luis Obispo Coast District

Date