



San Luis Obispo Coast District
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May 30, 2025

Sean Drake
California Coastal Commission
Central Coast District
725 Front Street, Suite 300
Santa Cruz, CA 95060

Subject: Response to Comments on the Department of Parks and Recreation San Luis Obispo Coast District's Piedras Blancas California Coastal Trail Project Mitigated Negative Declaration, SCH# 2024090173

Dear Mr. Drake,

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the Department of Parks and Recreation's (DPR) proposed Piedras Blancas California Coastal Trail Project (Project) have been analyzed in an Initial Study/Mitigated Negative Declaration (MND), dated July 2024.

Section 15704(b) of the CEQA Guidelines states that, prior to approving the project, the lead agency must consider the proposed IS/MND together with any comments received during the public review process. The lead agency must adopt the proposed IS/MND, only if it finds on the basis of the whole record that there is no substantial evidence that the project would have a significant effect on the environment and that the IS/MND reflects the lead agency's independent judgement and analysis. We received your letter, dated October 28, 2024, during the public comment review period. We have prepared responses to your comments and others received during the comment period. We are responding individually to each commenting agency as well as posting all responses to CEQAnet.

DPR received comment letters from four (4) agencies. The California Coastal Commission's letter was assigned A-3 as shown in Table 1, which provides an index of those comment letters, the date they were received, and corresponding numbered responses. Comment letters are organized chronologically by the date they were received. Comment letters, bracketed by comment, are reproduced in their entirety and are followed by response to each comment. A copy of your comment letter with each comment bracketed and numbered is attached for your reference to the corresponding responses that follow. Changes to the IS/MND, where deemed appropriate, are summarized in the response and refer to the applicable section in the IS/MND. Text changes are incorporated via the Errata prepared for the Final MND.

Table 1: Comment Letter Designation by Agency, Date of Correspondence, and numbered responses

Document Letter Designation	Agency and Date of	Response Designations
A-1	California Department of Fish and Wildlife, October 7, 2024	A-1-1 to A-1-6
A-2	Central Coast Regional Water Quality Control Board, October 25, 2024	A-2-1 to A-2-6

A-3	California Coastal Commission, October 28, 2024	A-3-1- to A-3-3
A-4	County of San Luis Obispo Planning and Building Department, November 5, 2024	A-4-1 to A-4-13

Response to Comments from California Coastal Commission

Response to A-3-1:

Comment noted. DPR acknowledges CCC's offer to permit the southern portion of the project via the CDP tied to Caltrans' highway realignment project, but we intend to apply to San Luis Obispo County for a separate CDP to ensure that the public is noticed and provided with opportunities for comment, which might not occur if we relied on the CDP for the northern portion of the Project. We want to ensure that the permitting process is transparent to the public. Since the southern portion is outside of Caltrans' highway realignment project area and not included in the project's EIR, our intent is to pursue a separate permit for that portion of the Project. DPR confirms that we will pursue authorization under the Coastal Act for the southern-most mile of the trail through the County of San Luis Obispo.

Response to A-3-2:

DPR acknowledges that Special Condition 5 and the Cooperative Agreement state that final CCT plans must be submitted to Commission staff for review and to the Executive Director approval prior to commencing construction. DPR also confirms a shared understanding of the Special Condition 5 requirements including:

- The proposed trail provides the impression of a natural surface path with curvilinear features, a compacted but unpaved surface, and widths generally not exceeding 6 feet. Additionally, the proposed trail alignment remains consistent with the scenic easement by including low profile trail features.
- Public use of the Motel site for the Project will consist of parking and trailhead access. This location provides access to both the north and south and provides parking for visitors.
- The trail will be accessible by pedestrians and cyclists, free of charge, year-round, with the exception of emergency or hazardous situations in which case it would be temporarily closed to the public.
- The Project includes several design elements for the protection of elephant seals including interpretive signage; posted orders to keep visitors on trail; the Project has been designed to fence, protect, and avoid haulouts and pupping sites and keep trail users separated from elephant seals; and a viewing platform to allow human observation of this species from a safe distance. Staffing the platform with docents who can interpret that natural history, protective regulations, and importance of elephant seals has been proven effective at keeping this resource protected while allowing the public to enjoy the seals from a safe distance at the elephant seal vista upcoast of this site, and DPR intends to implement that same program at the new viewing platform.
- Final CCT plans will include the location and contents of all signs and other project elements that will be used to facilitate, manage, and provide public access to the CCT, including educational displays, and interpretive signage.

Response to A-3-3:

Comment noted. While State Parks recognizes your concerns regarding the elephant seal viewing platform, the current design is consistent with Coastal Commission policies regarding managed retreat; the platform is designed to be moved

inland as needed. The platform is retractable, allowing for adjustments over time, including enough space for potential relocation.

DPR follows established trail management protocols to ensure visitor safety and accessibility. If the trail or its features, including boardwalks, bridges, and/or viewing platforms, are impacted by erosion or sea-level rise, DPR will rehabilitate or realign them, as has been done at Moonstone Beach Boardwalk.

The Project has been carefully designed to avoid impacts while balancing environmental protection, public safety, and visitor experience. To address potential human-animal interactions, which could result in disturbance or behavioral changes to the elephant seals, the platform's design features will include handrails to maintain a safe distance between visitors and wildlife. This mitigation aligns with NOAA regulations regarding appropriate setbacks from marine mammals and ensures compliance with best management practices for wildlife protection.

The Project's design features and standard project requirements—including handrails, interpretive signage, and adaptive management strategies—are appropriate under CEQA. The platform provides a controlled, interpretive opportunity for visitors while reducing the risk of unregulated access and disturbance to the elephant seals. This approach strikes a necessary balance between public recreation, education, and environmental resource protection. However, if the final design plans are found to be inconsistent with approved CDP, it will be dropped from the Project.

DPR appreciates your review of and comment on the MND to assist with the environmental review of the Project, and we look forward to continuing to coordinate with your agency on this and other projects.

Sincerely,

DocuSigned by:

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DAN FALAT
District Superintendent

Attachment: Original Comment Letter with Brackets

Cc: Katie Drexhage, Environmental Scientist
Doug Barker, Senior Park and Recreation Specialist
Northern Service Center