San Luis Obispo Coast District
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San Simeon, California 93452
Dan.Falat@parks.ca.gov

May 30, 2025

Phil Hammer
Central Coast Regional Water Quality Control Board
895 Aerovista Places, Suite 101
San Luis Obispo, CA 93401

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. Hammer,

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 25, 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 Central Coast Regional Water Quality Control Board's letter was assigned A-2 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 Correspondence	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 Central Coast Regional Water Quality Control Board

Response to A-2-1:

Comment noted. Initial Study has been updated to include an analysis of shading impacts based upon trail/boardwalk projects undertaken at nearby coastal park units. The updated Initial Study identifies the potential for permanent shading impacts to 0.13 acre of jurisdictional areas. Please refer to the revised Section IV, Biological Resources, as corrected by way of the Errata Sheet.

Response to A-2-2:

Comment noted. The Conceptual Mitigation Monitoring and Reporting Plan has been revised to include State jurisdictional wetlands and riparian definitions. Central Coast Water Board regulation of riparian impacts has been added to the IS/MND and Conceptual Mitigation Monitoring and Reporting Plan.

Response to A-2-3:

Comment noted. As noted in the Response to Comment A-2-1, the mitigation locations and ratios have been incorporated into Section IV, Biological Resources section of the Initial Study.

Response to A-2-4:

Comment noted. The Conceptual Mitigation Monitoring and Reporting Plan has been revised to reference a 5-year monitoring period in place of the previous 3-year monitoring period.

Response to A-2-5:

Comment noted. The Conceptual Mitigation Monitoring and Reporting Plan has been revised to specify that revegetation efforts to offset impacts to riparian habitat will include species within the impacted area and will mirror the habitat function of the jurisdictional areas impacted.

Response to A-2-6:

Comment noted. The final design of the viewing platform will avoid impacting the beach which will obviate the need for coastal armoring and will be above and outside the mean higher high tide. 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. 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 the approved Coastal Development Permit, it will be dropped from the Project.

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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:
71989530EE2A4E5...
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

Ec: Alia.Ajina@waterboards.ca.gov