Central Coast Regional Water Quality Control Board

October 25, 2024

Katie Drexhage
California State Parks
San Luis Obispo Coast District
750 Hearst Castle Rd
San Simeon, CA 93452
Email: Katie.Drexhage@parks.ca.gov

VIA ELECTRONIC MAIL

Dear Katie Drexhage:

COMMENTS ON THE INITIAL STUDY / MITIGATED NEGATIVE DECLARATION FOR THE PIEDRAS BLANCAS CALIFORNIA COASTAL TRAIL PROJECT

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) appreciates the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the Piedras Blancas California Coastal Trail Project (Project). Central Coast Water Board staff understands that this project involves the creation of 4.2 miles of accessible trail including boardwalks, bridges, and compacted gravel surfaces. The project includes nine boardwalks and vista points and four bridges along the trail.

The Central Coast Water Board is a responsible agency charged with the protection of the waters of the state in the central coast region. Waters of the state include surface waters, groundwater, and wetlands. Our preliminary review of the IS/MND indicates that the Project will impact waters of the state. Projects that impact waters of the state typically require permits from the Central Coast Water Board. We are writing this letter to provide you with information that can help reduce your project's impacts to waters of the state and facilitate your permitting process. We encourage you to contact Central Coast Water Board staff in the early stages of project planning and design. We are available to discuss your project and how it can meet Central Coast Water Board permit requirements. Contact information is provided at the end of this letter.

To facilitate comprehensive environmental evaluation of this project, we offer the following comments for your review.

1. The IS/MND and the Conceptual Mitigation Monitoring & Reporting Plan (Appendix G) state that construction of the Piedras Blancas Coastal Trail will include segments built over wetlands and that to avoid significant impacts, these portions of the trail will be constructed using elevated boardwalks. The IS/MND states that permanent impacts will be limited to pier blocks that will be placed below the surface to support the new boardwalks. Additionally, it states that the boardwalks will not permanently impact wetlands since they will be raised and will allow for continued growth of vegetation. The IS/MND does not assess the impact of shading on wetland vegetation that may result from the boardwalks. The potential impact to wetland vegetation from shading should be assessed in more detail in the IS/MND. The level of information provided in the IS/MND

is insufficient to demonstrate that impacts to wetlands from shading will be less than significant.

2. The Conceptual Mitigation Monitoring and Reporting Plan describes the wetland and riparian jurisdictions of the U.S. Army Corps of Engineers and California Coastal Commission. However, it does not describe the wetland and riparian jurisdiction of the Central Coast Water Board. As is described in the IS/MND, 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. The Central Coast Water Board's jurisdiction over wetlands is different than both the U.S. Army Corps of Engineers and the California Coastal Commission and should be identified when reviewing wetland impacts in the Conceptual Mitigation Monitoring and Reporting Plan. 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. Central Coast Water Board regulation of riparian impacts should also be added to the IS/MND and Conceptual Mitigation Monitoring and Reporting Plan.

3. Neither the IS/MND nor the Conceptual Mitigation Monitoring and Reporting Plan determine exact impacts to wetlands and riparian habitat. The documents also do not identify mitigation ratios, mitigation types, or mitigation locations. Instead, the documents state that impacts "will be mitigated on-site and/or off-site at a ratio agreed upon with regulatory permitting agencies." The lack of proposed mitigation sites, types, and ratios is insufficient to demonstrate that impacts to wetlands and riparian areas will be reduced to a less than significant level with mitigation.

4. The Conceptual Mitigation Monitoring and Reporting Plan states that State Parks will perform annual monitoring and submit annual reports to regulatory agencies for a three-year period. Three years of monitoring is unlikely to be adequate to demonstrate mitigation success. Five years of monitoring is standard to confirm mitigation sites are successful.

5. The Conceptual Mitigation Monitoring and Reporting Plan states that arroyo willow riparian habitat impacts will be mitigated by planting willow cuttings in appropriate areas. Planting willow cuttings alone may not be sufficient to reduce impacts to riparian habitat to less than significant levels. All species impacted, acreage impacted, and the riparian habitat functions impacted should be reviewed and considered when identifying mitigation for riparian habitat impacts and demonstrating reduction of those impacts to less than significant levels.

6. The construction diagrams in the IS/MND show a proposed elephant seal viewing platform. The IS/MND lacks an adequate description of the elephant seal viewing platform and does not analyze potential impacts to the beach or below the mean higher-high tide line that may be associated with the piers that would hold up the platform. Additionally, the IS/MND identifies how bluff retreat and sea level rise may affect the project site and identified that the California Coastal Commission requires a total building setback distance of 78 feet from the bluff. However, the elephant seal viewing platform appears to not be set back from the bluff and instead is on the bluff edge with piers potentially on the beach. The elephant seal viewing platform should be analyzed for

potential impacts to the beach and below the mean higher-high tide line. A bluff retreat and sea level rise analysis should also be completed as it relates to the elephant seal viewing platform, to ensure it will not require coastal armoring in the future due to sea level rise.

If you have questions or would like to discuss these comments further, please contact Alia Ajina at Alia.Ajina@waterboards.ca.gov or (805) 542-4646, or Phil Hammer at (805) 549-3882.

Sincerely,

Digitally signed by Phillip Hammer
Date: 2024.10.25 10:50:35 -07'00'

Water Boards

for
Ryan E. Lodge
Executive Officer

cc:

Sean Drake, California Coastal Commission: sean.drake@coastal.ca.gov

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