INITIAL STUDY /
MITIGATED NEGATIVE DECLARATION

PIEDRAS BLANCAS CALIFORNIA COASTAL TRAIL PROJECT

View of elephant seal rookery south of the Piedras Blancas Lighthouse

July 2024

State of California

California State Parks

MITIGATED NEGATIVE DECLARATION

PROJECT: Piedras Blancas California Coastal Trail Project

LEAD AGENCY: California State Parks

AVAILABILITY OF DOCUMENTS: The Initial Study for this Mitigated Negative Declaration is available for review at:

- California State Parks
  San Luis Obispo Coast District Office
  750 Hearst Castle Rd
  San Simeon, CA 93452
- California State Parks
  Morro Bay Sector Office
  11 State Park Rd
  Morro Bay, CA 93442
- Northern Service Center
  California Department of Parks and Recreation
  2241 Harvard Street, Suite 200
  Sacramento, CA 95815
- San Luis Obispo County Library Branches:
  Cambria Library
  1043 Main Street
  Cambria, California 93428
  San Luis Obispo Library
  995 Palm Street
  San Luis Obispo, California 93401
- Online at: https://www.parks.ca.gov/?page_id=982

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.

A copy of the Initial Study is attached. Questions or comments regarding this Initial Study/ Mitigated Negative Declaration may be addressed to:

Katie Drexhage, Senior Environmental Scientist
San Luis Obispo Coast District/California State Parks
katie.drexhage@parks.ca.gov
(805) 712-4768

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 Draft Mitigated Negative Declaration for the proposed project and finds that these documents reflect the independent judgment of DPR. DPR, as lead agency, also confirms that the project mitigation measures detailed in these documents are feasible and will be implemented as stated in the Mitigated Negative Declaration.

7/23/24

Dan Falat
District Superintendent

Date

7/24/24

Katie Drexhage
Senior Environmental Scientist, Supervisory

Date

Figure PROJ-1. Map showing San Luis Obispo County highlighted on a state and regional scale with the project location indicated on the regional scale.

TABLE OF CONTENTS

CHAPTER 1 INTRODUCTION

1.1. INTRODUCTION AND REGULATORY GUIDANCE

The Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the California Department of Parks and Recreation (DPR) to evaluate the potential environmental effects of the proposed Piedras Blancas Coastal Trail Project (PBCT) in Hearst San Simeon State Park in San Luis Obispo County, California. This document has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code §21000 *et seq*., and the State CEQA Guidelines, California Code of Regulations (CCR) §15000 *et seq*.

An Initial Study is conducted by a lead agency to determine if a project may have a significant effect on the environment [CEQA Guidelines §15063(a)]. If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared, in accordance with CEQA Guidelines §15064(a). However, if the lead agency determines that revisions in the project plans or proposals made by or agreed to by the applicant mitigate the potentially significant effects to a less than significant level, a Mitigated Negative Declaration may be prepared instead of an EIR [CEQA Guidelines §15070(b)]. The lead agency prepares a written statement describing the reasons a proposed project would not have a significant effect on the environment and, therefore, why an EIR need not be prepared.

This IS/MND conforms to the content requirements under CEQA Guidelines §15071. The PBCT portion of this project being funded by the California Department of Transportation (Caltrans) includes money from federal sources. Therefore, the National Environmental Protection Act (NEPA) requirements must be met. Since this project impacts federal wetlands, an Army Corps of Engineers permit is necessary, and a Nationwide Permit Pre-Construction Notification is being pursued. Within this permit application, a Section 106 archaeological report must be completed. Through the use of these processes the requirements of NEPA are being satisfied.

Responsible and Trustee agencies include the California Department of Fish and Wildlife (CDFW), the California Coastal Commission (CCC), the San Luis Obispo Regional Water Quality Control Boards (RWQCB), and San Luis Obispo County, and the United States Fish and Wildlife Service (USFWS) and United States Army Corps of Engineers (ACOE) are Cooperating Agencies. As such, these agencies will review this document and appropriate permits will be pursued prior to project implementation. Impacts to wetlands will require State permits for compliance with the Coastal Act and Section 401 of the Clean Water Act. The Project will require a Coastal Development Permit from the County of San Luis Obispo and the project is herein analyzed under the requirements of the Coastal Act. The proposed Project was developed in conformance with the San Luis Obispo County North Coast Area Plan, San Luis Obispo County's Local Coastal Program's planning document that covers the area that the Project is located in. The project is being cooperatively planned with Caltrans and will interface with Caltrans facilities including parking lots, a boardwalk trail, and plant restoration areas, thus requiring encroachment permits and mutual Right of Entry permits for restoration and

resource monitoring. As the administrator of the Hearst Scenic Conservation Easements (SCE's), Caltrans also has responsibility to review the Project for consistency with the SCE's.

The trail also crosses mapped coastal streams, and therefore is subject to restrictions regarding projects within 100 feet of coastal streams.

The project site is also located within the California Coastal Zone as established by the California Coastal act of 1976 and is subject to the provisions of the Local Coastal Plan. The proposed project is appealable to the California Coastal Commission.

1.2 LEAD AGENCY

The lead agency is the public agency with primary approval authority over the proposed project. In accordance with CEQA Guidelines §15051(b)(1), "the lead agency will normally be an agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." The lead agency for the proposed project is DPR. The contact person for the lead agency regarding specific project information is:

Katie Drexhage, Senior Environmental Scientist,
11 State Park Rd., Morro Bay, CA 93442
(805) 712-4768
Email: katie.drexhage@parks.ca.gov

Questions / comments regarding this Initial Study/Mitigated Negative Declaration should be submitted to:

Katie Drexhage, Senior Environmental Scientist,
11 State Park Rd., Morro Bay, CA 93442
(805) 712-4768
Email: katie.drexhage@parks.ca.gov

Submissions must be in writing and postmarked or received by fax or email no later than September 3, 2024. The originals of any faxed document must be received by regular mail within ten working days following the deadline for comments, along with proof of successful fax transmission. Email or fax submissions must include full name and address. All comments will be included in the final environmental document for this project and become part of the public record.

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of this document is to evaluate the potential environmental effects of the proposed PBCT. Mitigation measures have also been incorporated into the project to eliminate any potentially significant impacts or reduce them to a less-than-significant level.

This document is organized as follows:

- Chapter 1 - Introduction.

  This chapter provides an introduction to the project and describes the purpose and organization of this document.

- Chapter 2 - Project Description.

This chapter describes the reasons for the project, scope of the project, and project objectives.

- Chapter 3 - Environmental Setting, Impacts, and Mitigation Measures.
- Chapter 4 - Mandatory Findings of Significance.

  This chapter identifies and summarizes the overall significance of any potential impacts to natural and cultural resources, cumulative impacts, and impact to humans, as identified in the Initial Study.
- Chapter 5 – Summary of Standard Project Requirements and Mitigation Measures
- Chapter 6 – References.

  This chapter identifies the references and sources used in the preparation of this IS/ND.
- Chapter 7 - Report Preparation

  This chapter provides a list of those involved in the preparation of this document.

1.4 SUMMARY OF FINDINGS

Chapter 3 of this document contains the Environmental (Initial Study) Checklist that identifies the potential environmental impacts (by environmental issue) and a brief discussion of each impact resulting from implementation of the proposed project.

Based on the IS and supporting environmental analysis provided in this document, the proposed PBCT would result in less than significant impacts for the following issues: aesthetics, air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, noise, and planning, recreation, transportation, and tribal cultural resources. Additionally, the Project would result in less than significant impacts to biological resources with mitigation incorporated.

In accordance with §15064(f)(2) of the CEQA Guidelines, the lead agency may prepare a Mitigated Negative Declaration if it determines there is substantial evidence in the record that the project may have a significant effect on the environment but the lead agency determines that revisions in the project plans or proposals made by, or agreed to by, the applicant would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur and there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

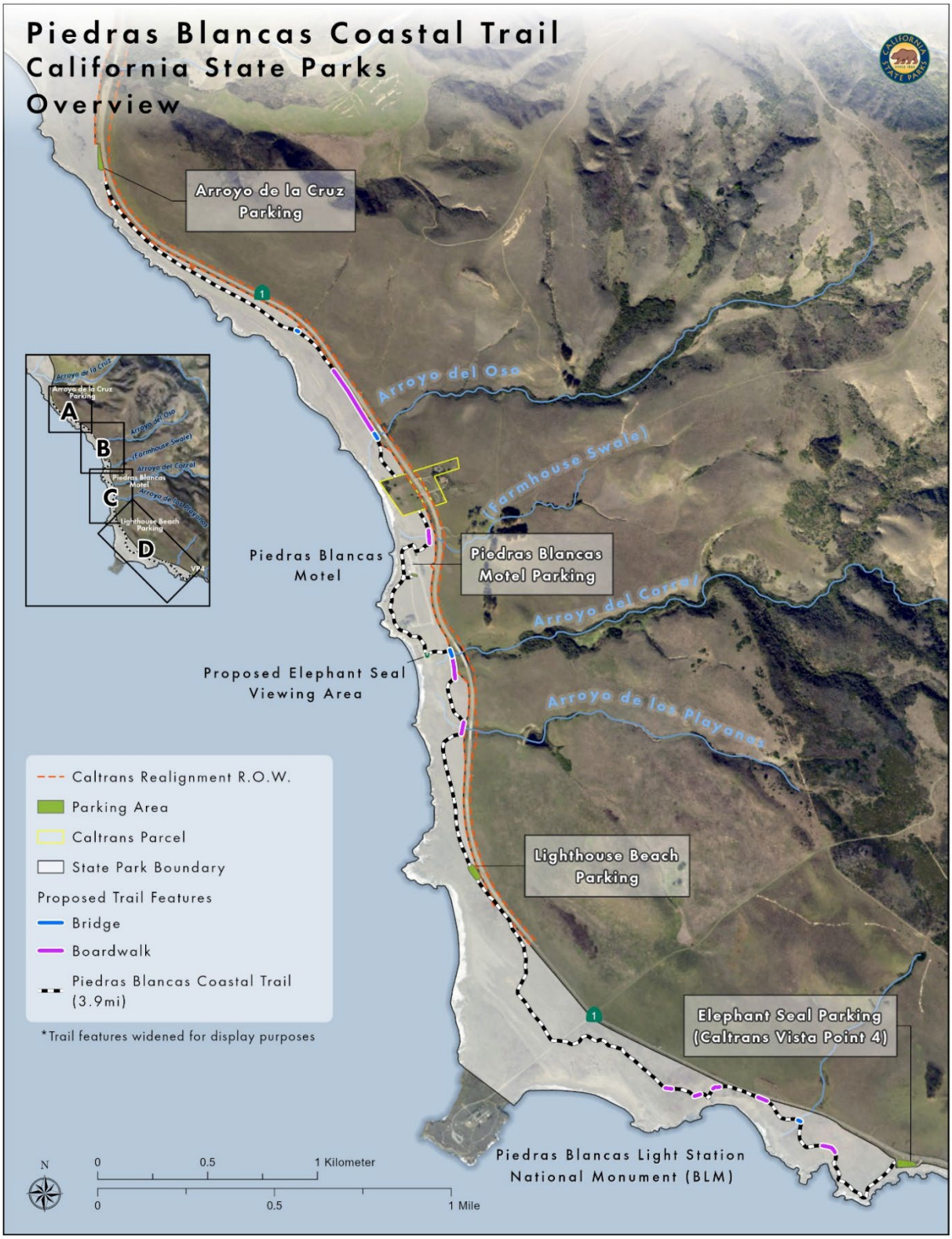

Figure PROJ-2. Map showing project area and proposed trail structures.

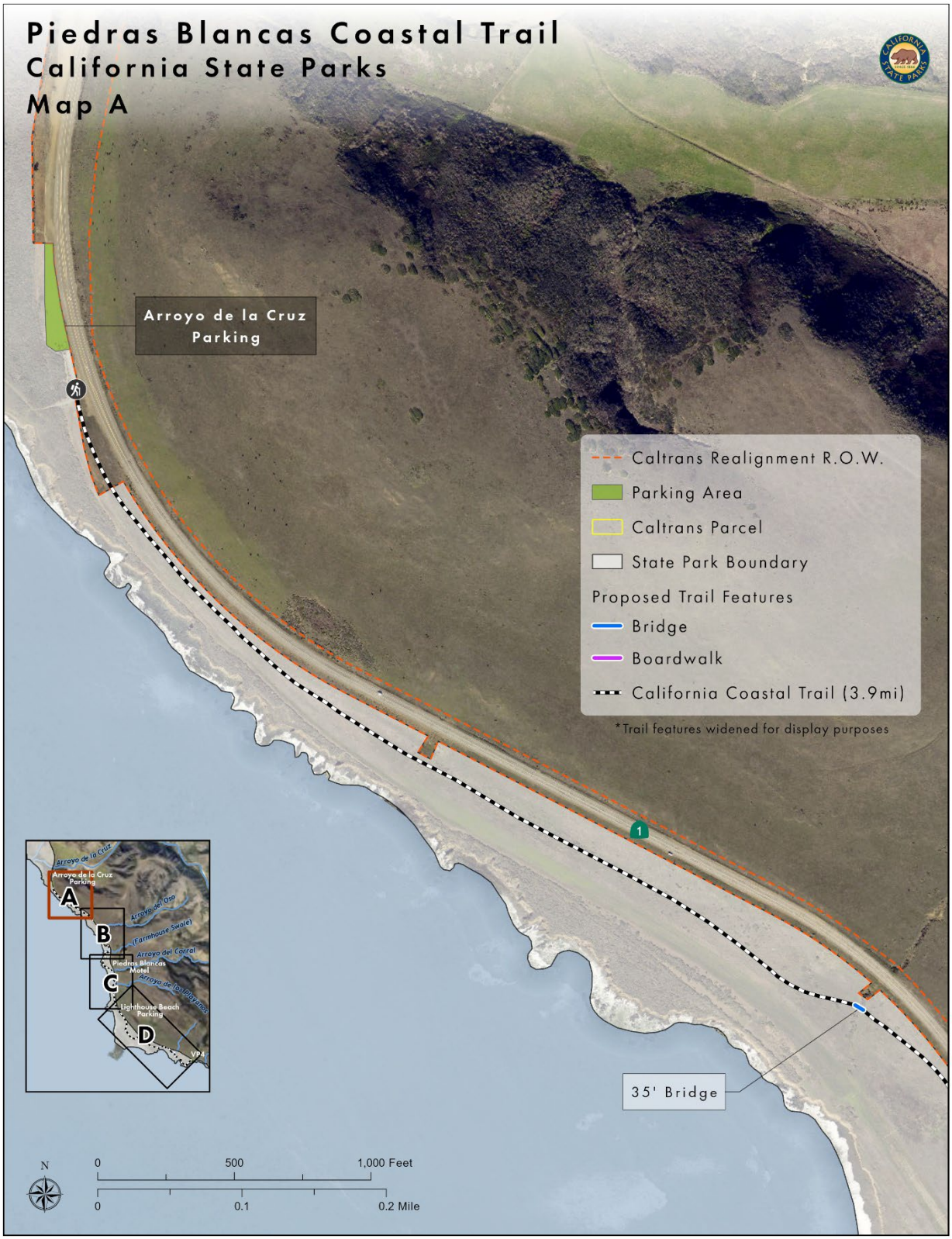

Figure PROJ-3. Piedras Blancas Costal Trail - Map A

Figure PROJ-4. Piedras Blancas Costal Trail - Map B

Figure PROJ-5. Piedras Blancas Costal Trail - Map C

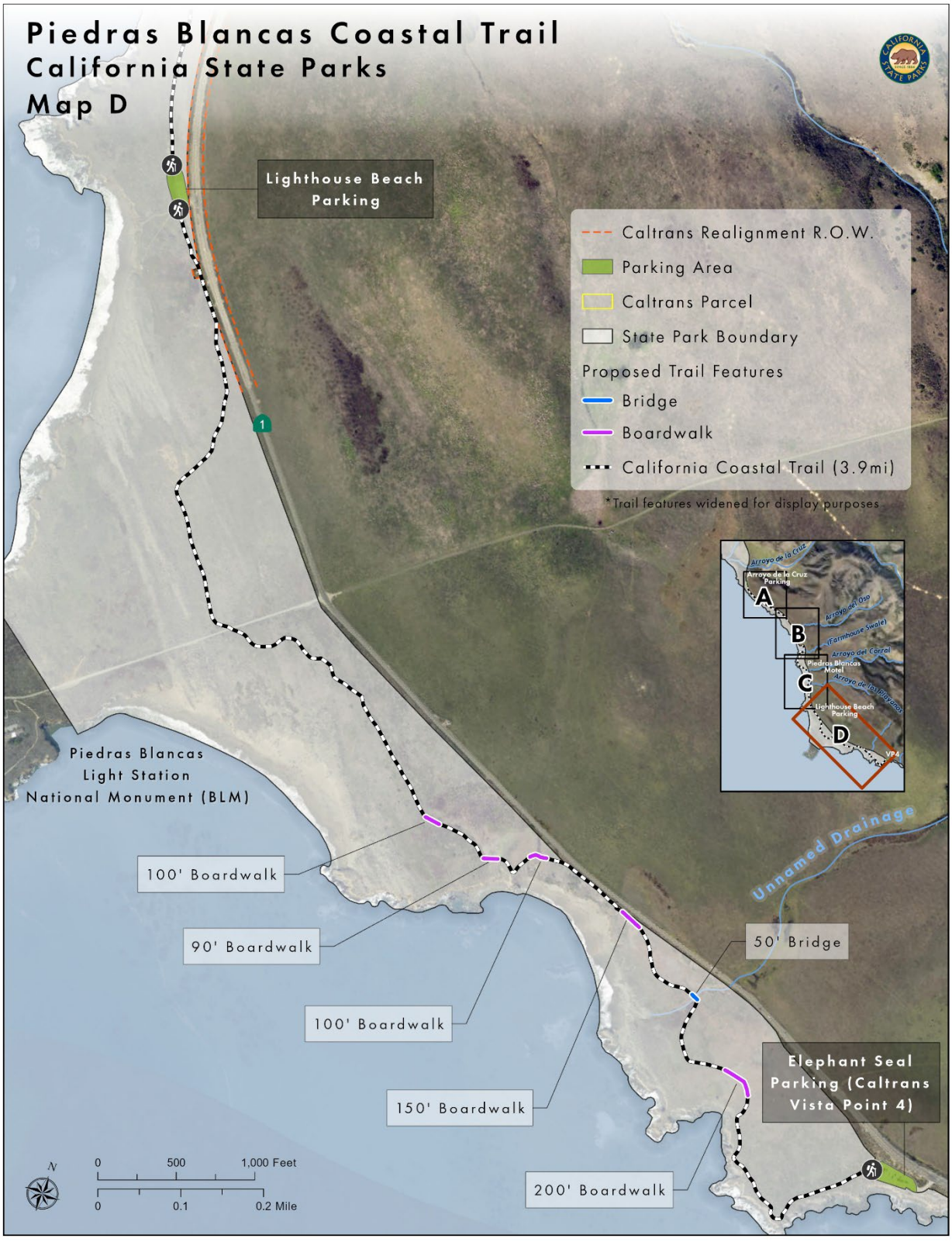

Figure PROJ-6. Piedras Blancas Costal Trail - Map D

CHAPTER 2 PROJECT DESCRIPTION

2.1 INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by DPR to evaluate the potential environmental effects of the proposed Piedras Blancas California Coastal Trail Project at Hearst San Simeon State Park (HSSSP), located in San Luis Obispo County, California.

The Piedras Blancas California Coastal Trail Project (PBCT) consists of 4.2 miles of accessible trail including boardwalks, bridges, and compacted gravel surfaces. The width of trails will vary between 4 and 5 feet and the area of trail will total approximately 2.5 acres. 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.

The PBCT will be accessible and consist of a trail corridor averaging 4.5 feet wide (5 feet wide on bridges and boardwalk structures and 4 feet wide on improved aggregate trail surface). The Project will include 9 boardwalks and vista points and 4 bridges along the trail. All vista points and bridges will have handrails.

Construction of the PBCT will result in approximately 9.5 acres of total disturbance, including temporary impacts resulting from staging and stockpiling, temporary vegetation disturbance, and permanent impacts as a result of the trail including boardwalks and bridges. Trail segments, including boardwalks and bridges, will measure approximately 22,189 linear feet which is equivalent to approximately 4.2 miles.

2.2 PROJECT LOCATION AND SETTING

The PBCT is located in HSSSP which is comprised of 1,696 acres along the north coast of San Luis Obispo County about 11 miles north of the community of San Simeon. Table PROJ-2 provides a summary of the acreage and facilities provided in the Park, as of 2017.

Table PROJ-2. Project Location and Setting

Unit No.	State Park Acreage	Other Acreage (Preserves)	Waterfront (feet)	Individual Campsites	Group Camp Sites	Individual Picnic Sites	Group Picnic Sites	Non Motorized Trails (miles)
487	1,696	613.00	115,643	201	0	66	0	6.00

"Other Acreage" refers to lands within the park designated as Natural Preserves and a Cultural Preserve."

Visitor surveys provide an estimate of the number of people who visited HSSSP between 2013 and 2023:

Table PROJ-3. Annual Visitation to Hearst San Simeon State Park

Hearst San Simeon State Park Visitors By Year	
Year	Total Visitors
2013	293,688
2014	302,953
2015	376,643
2016	375,028
2017	357,289

2018	477,665
2019	480,907
2020	392,958
2021	476,982
2022	479,534
2023	334,689
Average	395,302 per year

Source: 2023 DPR Attendance Database

The PBCT will be located on a coastal terrace that lies between Highway 1 and the Pacific Ocean. The project site extends northward about four miles from the elephant seal boardwalk parking lot at Caltrans Vista Point 4 to the Arroyo de la Cruz parking lot 0.25 miles south of the arroyo or creek. (Figure PROJ-1). The coastal terrace is relatively level along the project area except where incised by ephemeral creeks, from north to south: "Arroyo del Oso, Arroyo del Corral, Arroyo de los Playanos," and several unnamed drainages and culverts. Properties surrounding the project site are in private ownership and are generally used for grazing.

2.3 SURROUNDING LAND USES AND DEVELOPMENT

Surrounding land uses consist of open space lands within the San Simeon State Park between Highway 1 and the ocean, with grazing and ranching on lands east of Highway 1.

Currently, three single family residences are located on the east side of Highway 1 approximately ¼ mile north of the Piedras Blancas Motel site. The northernmost of these residences (former Welsh house) will be demolished for Caltrans mitigation and plant restoration site.

HSSSP consists of multiple parcels which are not all contiguous. Following the last major acquisitions/donations of former Hearst Ranch parcels, the Piedras Blancas motel property, and the Junge parcel on the west side of Highway 1, as well as the Molinari parcel east of the Highway, HSSSP now encompasses 1,696 acres. HSSSP is zoned for recreational use and borders private single family residential properties, the Cambria Community Services District facility and private parcels in the south, Hearst Ranch to the east and north, and the Los Padres National Forest in the north.

2.4 BACKGROUND AND NEED FOR THE PROJECT

In 2001 the California Legislature mandated the completion of the California Coastal Trail through the passage of Senate Bill 908. When completed, the Coastal Trail will extend from the Mexican border to the Oregon border, approximately 1,200 miles. Five Specific principles were detailed for laying out the CCT and generally apply to all of the different components:

- PROXIMITY. Wherever feasible, the Coastal Trail should be within sight, sound, or at least the scent of the sea.

- CONNECTIVITY. The trail should effectively link starting points to destinations
- INTEGRITY. The Coastal Trail should be continuous and not compromised by motor traffic.
- RESPECT. The trail must be located and designed with a healthy regard for the protection of natural habitats, cultural and archaeological features, private property rights, neighborhoods, and agricultural operations along the way.
- FEASIBILITY. To achieve timely, tangible results with the resources that are available, both interim and long-term alignments of the Coastal Trail will need to be identified.

The proposed project would construct roughly four miles of the California Coastal Trail within HSSSP. San Simeon, on the central coast of California is a popular tourist destination with amenities that include Hearst Castle, Historic San Simeon Village, restaurants and winery, a large elephant seal colony, and scenic rocky shoreline and beaches. Completing the Piedras Blancas portion of the California Coastal Trail would provide recreational opportunities, which is one of the important objectives of DPR, the County of San Luis Obispo, the travel and tourism industry, and the CCC. The PBCT would expand visitor recreational opportunities for all age groups, physical abilities, and economic levels.

The Coastal Development Permit for the northern portion of the PBCT project from the north light house beach to Arroyo de la Cruz (approximately 3 miles long) has already been approved by the CCC as part of the Caltrans Highway 1 Realignment Project's coastal development permit. The PBCT project still requires CEQA compliance. The approximately 1-mile-long southern portion of the PBCT which was outside the project area of the Highway realignment will require approval of a separate discretionary coastal development permit from the San Luis Obispo (SLO) County Planning Commission. A decision by the Planning Commission may be appealed to the SLO County Board of Supervisors (Board). The Board's decision may be appealed to the CCC.

2.5 PROJECT OBJECTIVES

The mission of DPR is to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality recreation. The project will meet several objectives.

The objectives for this project are:

- Provide recreational access to the coast for all age groups, income levels, and physical abilities;
- Provide visitor education and interpretation by furnishing periodic wildlife viewing areas and interpretive panels/exhibits;
- Provide viable portions of the California Coastal Trail that State Parks is able to manage and maintain;

- Restore and protect sensitive areas of HSSSP.
- Improve the visitor experience; and
- Provide greater public access to the shoreline.

2.6 PROJECT DESCRIPTION AND SCOPE OF WORK

The Piedras Blancas California Coastal Trail Project (PBCT) consists of 4.2 miles of accessible trail including boardwalks, bridges, and compacted gravel surfaces. The width of trail will vary between 4 and 5 feet and total approximately 2.5 acres. 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.

Some of the facilities that will serve the PBCT and reduce potential impacts to traffic from the PBCT, specifically parking lots and left-turn lanes, have already been constructed by Caltrans as a part of their highway realignment project (see Section 2.11, Related Projects).

The PBCT will be accessible and consist of a trail corridor measuring between 4 and 5 feet wide (5 feet wide on bridges and boardwalk structures and 4 feet wide on improved aggregate trail surfaces). The project will include 9 boardwalks and vista points and 4 bridges along the trail. Figures PROJ-2 though PROJ-6 show the proposed trail route. The PBCT will be an accessible multi-use trail for hikers and bicycles.

Table PROJ-4. Coastal Trail Feature Lengths and Project Acreage

Trail Feature	Lengths
Length of earth tone road base surface sections	20,358 feet
Length of boardwalk sections	1565 feet
Length of bridged sections	275 feet
Total Length of Trail including Boardwalks & Bridges	22,189 feet = 4.2 miles
Project Acreage	
Earth tone road base trail, boardwalks, & bridges	2.5 acres
Temporary vegetation disturbance (~5 feet on either side of trail, boardwalks, bridges)	5 acres
Staging and stockpiling	2 acres
Total Project Acreage	**9.5 acres**

Typical construction plans and methods are provided in Appendix A. These consist of trail cross sections, typical materials and dimensions, running slopes, cross slopes, and bridge/boardwalk plans from the DPR Trails Handbook and the Accessibility Handbook. Also provided are construction diagrams for the proposed elephant seal viewing platform at Arroyo del Corral, and manufacturer drawings and specifications for weather-resistant raised fiberglass boardwalks and bridges.

The PBCT will incorporate special design elements such as handrails and fencing to keep visitors away from elephant seal colonies. Special design elements will be most intense in the Piedras Blancas Motel area, where viewing platforms, bridges, and boardwalks will be raised and will incorporate railing and redundant fencing.

Construction staging will be provided in the following locations (see PROJ-2):

- The Vista 4 parking lot at the elephant seal boardwalk
- The parking lot near North Lighthouse Beach;
- The Piedras Blancas Motel parking lot and portions of the old Highway 1 right-of-way; and
- The parking lot south of Arroyo de la Cruz.

2.7 PROJECT REQUIREMENTS

Under CEQA guidelines, DPR is in a unique role as both the Lead Agency and a Trustee Agency. The Lead Agency is a public agency that has the primary responsibility for carrying out or approving a project and for implementing CEQA. A Trustee Agency is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. DPR takes this distinction with responsibility to ensure that its actions protect both cultural and natural resources on all projects.

However, DPR is also the landowner and project proponent. Because of its unique role as Lead Agency, Trustee Agency as well as the project proponent, DPR's resource professionals take a prominent and influential role during the project conceptualization, design and planning process consistent with Section 15004(b)(1) of CEQA. Their early involvement during the planning process enables environmental considerations to influence project programming and design. This approach requires DPR under CEQA Section 15065(b)(1), to incorporate project modifications prior to the start of the public review process of the environmental document, to avoid impacts to a point where clearly no significant effect on the environment would occur.

As part of its effort to avoid impacts, DPR also maintains a list of Project Requirements that are included in project design to further reduce (less than significant) impacts to resources. From this list, standard project requirements are assigned, as appropriate to all projects. For example, projects that include ground-disturbing activities, such as trenching would always include standard project requirements addressing the inadvertent discovery of archaeological artifacts. However, for a project that replaces a roof on an historic structure, ground disturbance would not be necessary; therefore, standard project requirements for ground disturbance would not be applicable and DPR would not assign it to the project.

DPR also makes use of specific project requirements. DPR develops these project requirements to address impacts for projects that have unique issues but do not typically standardize these for projects statewide.

Table PROJ-5: Project Requirements

Element/Title	Standard Project Requirements (SPR)
Air Quality	SPR AQ-1: Dust Management: a) During dry, dusty conditions, all active construction areas will be lightly sprayed with dust suppressant to reduce dust without causing runoff. b) All trucks or light equipment hauling soil, sand, or other loose materials on public roads will be covered or required to maintain at least two feet of freeboard. c) Excavation and grading activities will be suspended when sustained winds exceed 15 miles per hour (mph), instantaneous gusts exceed 25 mph, or when dust occurs from remediation related activities where visible emissions (dust) cannot be controlled by watering or conventional dust abatement controls. SPR AQ-2: Maintenance of Equipment: All gasoline-powered equipment will be maintained according to manufacturer's specifications, and in compliance with all State and federal requirements.
Biological Resources	SPR BIOR-1: Environmentally Sensitive Areas Environmentally Sensitive Areas will be demarcated, and all work personnel and vehicles/equipment will avoid those areas. SPR BIOR-2: Environmental Awareness Training Environmental training will be provided by a DPR Environmental Scientist for all work personnel prior to the onset of work activities, including staging and stockpiling. SPR BIOR-3: Best Management Practices a) Prior to the start of on-site construction 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. SPR 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.

	SPR 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.
Cultural Resources	SPR CULT-1: Cultural Resource Awareness Training Prior to the start of ground disturbing activities, cultural resources awareness training will occur for all construction staff. The purpose of the training will be to educate construction personnel as to the potential presence of historic resources and/or archaeological resources within subsurface soils and that DPR staff and tribal monitors may be onsite to inspect for such resources within excavations. Staff will be educated on the appearance and types of objects that may constitute historic or archaeological resources and instructed to refrain from disturbing these resources. The staff will be instructed to halt work in the event any such cultural resources are unearthed or encountered on the surface. SPR CULT-2: Inadvertent Discovery and Treatment Plan If any previously undocumented cultural resources are inadvertently encountered within project excavations (including but not limited to dark soil containing, bone, flaked stone, ground stone, or deposits of historic trash), work within the immediate vicinity of the find will be halted or diverted until the District Archaeologist, or a DPR-qualified cultural resource specialist has evaluated the find and implemented appropriate treatment and regulatory compliance, including contacting a Native American tribal monitor and drafting an Archaeological Treatment Plan. SPR CULT-3: Human Remains a) In the event human remains are discovered work will cease in the immediate area of the find until further notice and the onsite DPR representative will notify the District Archaeologist or District Superintendent Designee who will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code, and the Native American Heritage Commission (NAHC). Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered. In addition, the DPR district archaeologist will notify the SLO County Environmental Coordinator (or authorized representative) of the discovery. b) The SLO County Coroner will make the determination of whether the human remains are of Native American origin and will contact the NAHC in Sacramento, who will then identify a most likely descendant (MLD). Once appointed, the MLD will then have 24 hours to visit the site, inspect the find and recommend appropriate treatment and disposition of the remains. Work will not resume in the area of the find until proper disposition is complete (PRC §5097.98). No

	human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the site prior to determination. 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 titʸu titʸu yak tiłhini 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.
Geology and Soils	SPR GEO-1: Maintaining Structural Integrity. After a large earthquake event (i.e., magnitude 5.0 or greater within 50 miles of the project site), a qualified professional chosen by DPR will inspect all project structures and features for damage, as soon as is possible after the event. If any structures or features have been damaged, they will be closed to park visitors, volunteers, residents, contractors, and staff. SPR GEO-2: Erosion Control and SWPPP: A stormwater pollution prevention plan (SWPPP) will be required for the project and appropriate BMPs will be required to prevent erosion from all applicable areas.
Hazards and Hazardous Materials	SPR HAZ-1: Hazardous Materials Management a) Prior to the start of on-site construction activities, Contractor will prepare a Spill Prevention and Response Plan as part of the Storm Water Pollution Prevention Plan (SWPPP) for RWQCB approval to provide protection to on-site workers, the public, and the environment from accidental leaks or spills of vehicle fluids or other potential contaminants. This plan will include (but not be limited to); o a map that delineates construction staging areas, where refueling, lubrication, and maintenance of equipment will occur; o a list of items required in a spill kit on-site that will be maintained throughout the life of the Project; o procedures for the proper storage, use, and disposal of any solvents or other chemicals used in the restoration process; o and identification of lawfully permitted or authorized disposal destinations outside of the project site. b) Prior to the start of on-site construction activities, Contractor will clean and repair (other than emergency repairs) all equipment outside the project site boundaries. c) Contractor will designate and/or locate staging and stockpile areas within the existing maintenance yard area or existing roads and campsites to prevent leakage of oil, hydraulic fluids, etc. into the ephemeral creeks, associated wetlands and riparian communities. d) Prior to the start of on-site construction activities, Contractor will inspect all equipment for leaks and regularly inspect thereafter until equipment is removed from the project site. All contaminated water, sludge, spill residue, or other hazardous compounds will be contained and disposed of outside the boundaries of the site, at a lawfully permitted or authorized destination.

Hydrology and Water Quality	SPR HYRDO-1: Regulatory Compliance a) Prior to the start of construction involving ground-disturbing activities, Contractor will prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) for DPR approval that identifies temporary Best Management Practices (BMPs) (e.g., tarping of any stockpiled materials or soil; use of silt fences, straw bale barriers, fiber rolls, etc.) and permanent (e.g., structural containment, preserving or planting of vegetation) for use in all construction areas to reduce or eliminate the discharge of soil, surface water runoff, and pollutants during all excavation, grading, trenching, repaving, or other ground-disturbing activities. The SWPPP will include BMPs for hazardous waste and contaminated soils management and a Spill Prevention and Control Plan, as appropriate. b) The Project will comply with all applicable water quality standards as specified in the Central Coast Basin Plan.
Land Use and Planning	SPR LAND-1: The Project will include regulatory, interpretive, and educational signage as standard project requirements.
Noise	SPR NOISE-1: Construction Activities a) Internal combustion engines used for project implementation will be equipped with a muffler of a type recommended by the manufacturer. Equipment and trucks used for Project-related activities will utilize the best available noise control techniques (e.g., engine enclosures, acoustically attenuating shields or shrouds, intake silencers, ducts, etc.) whenever necessary. b) Contractor will locate stationary noise sources and staging areas as far from potential sensitive noise receptors, as possible. If they must be located near potential sensitive noise receptors, stationary noise sources will be muffled or shielded, and/or enclosed within temporary sheds. c) Construction activities will generally be limited to the daylight hours, Monday – Friday. If work during weekends or holidays is required, no work will occur on those days before 8:00 a.m. or after 5:00 p.m. d) All motorized construction equipment will be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes.
Recreation	SPR REC-1: The Project will include handrails along the bridges and vista points, and boardwalks within ESHA to keep people on trail as a standard project requirement.
Tribal and Cultural Resources	SPR CULT-1: Cultural Resource Awareness Training Prior to the start of ground disturbing activities, cultural resources awareness training will occur for all construction staff. The purpose of the training will be to educate construction personnel as to the potential presence of historic resources and/or archaeological resources within subsurface soils and that DPR staff and tribal monitors may be onsite to inspect for such resources within excavations. Staff will be educated on the appearance and types of objects that may constitute historic or archaeological resources and instructed to refrain from disturbing these resources. The staff will be instructed to halt work in the event any such cultural resources are unearthed or encountered on the surface. SPR CULT-2: Inadvertent Discovery and Treatment Plan

	If any previously undocumented cultural resources are inadvertently encountered within project excavations (including but not limited to dark soil containing, bone, flaked stone, ground stone, or deposits of historic trash), work within the immediate vicinity of the find will be halted or diverted until the District Archaeologist, or a DPR-qualified cultural resource specialist has evaluated the find and implemented appropriate treatment and regulatory compliance, including contacting a Native American tribal monitor and drafting an Archaeological Treatment Plan. SPR CULT-3: Human Remains a) In the event human remains are discovered work will cease in the immediate area of the find until further notice and the onsite DPR representative will notify the District Archaeologist or District Superintendent Designee who will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code, and the Native American Heritage Commission (NAHC). Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered. In addition, the DPR district archaeologist will notify the SLO County Environmental Coordinator (or authorized representative) of the discovery. b) The SLO County Coroner will make the determination of whether the human remains are of Native American origin and will contact the NAHC in Sacramento, who will then identify a most likely descendant (MLD). Once appointed, the MLD will then have 24 hours to visit the site, inspect the find and recommend appropriate treatment and disposition of the remains. Work will not resume in the area of the find until proper disposition is complete (PRC §5097.98). No human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the site prior to determination. 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 titᵛu titᵛu yak tiłhini 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.
Wildfire	WLDF-1: Fire Prevention a) Prior to the start of construction, Contractor will develop a Fire Safety Plan for Cal Fire approval. The plan will include the emergency calling procedures for both the California Department of Forestry and Fire Protection (CDF) and local fire department(s). b) All heavy equipment will be required to include spark arrestors or turbo chargers (which eliminate sparks in exhaust) and have fire extinguishers on-site. c) Construction crews will park vehicles 500 feet from flammable material, such as dry grass or brush. At the end of each workday, construction crews will park heavy equipment over a non-combustible surface to reduce the chance of fire. d) DPR personnel will have the Emergency Command Center contact information on hand, which allows direct contact with CAL FIRE and a centralized dispatch center, to facilitate the rapid dispatch of control crews and equipment in case of a fire.

2.8 PROJECT IMPLEMENTATION

After permitting, construction will occur in phases based on available funding. Higher priority segments are those that provide connectivity to existing trail and parking facilities, such as the elephant seal parking lot north to Piedras Blancas Motel parking lot where a portion of the trail has already been completed.

The PBCT Project will be completed by a contractor through the Public Works Contract process or a Master Service Agreement with The AmeriCorps or similar. The majority of the work will be completed with hand tools, handheld power tools, and small mechanized equipment such as toters and rock drills. In project areas where it is possible to use heavy equipment, the contractor could use mini-excavators and trail dozers to construct portions of the new trail as well as rehabilitate the existing trail. The PBCT will be constructed in phases as funding for various segments become available. Areas proposed for restoration for PBCT impacts will be completed concurrently with the trail. Access will occur from staging and stockpiling sites: Vista 4 parking lot at the elephant seal boardwalk, the parking lot near North Lighthouse Beach, the Piedras Blancas Motel parking lot and portions of the old Highway 1 right-of-way; and the parking lot south of Arroyo de la Cruz. To reduce impacts to air quality and/or traffic, options for contractor trailers and/or camping facilities for trails crews will be available at either the Piedras Blancas motel site or San Simeon Campground.

Best Management Practices (BMPs) will be incorporated into this project design to ensure that the natural and cultural resources in and around the project area are adequately protected during and after construction. DPR will utilize Coastal Commission developed BMPs. The project would employ temporary BMPs to keep sediment on-site throughout the duration of the project; during construction, DPR would check BMPs daily, and maintain, and modify as needed. DPR would use BMPs after construction to stabilize the site and minimize erosion.

2.9 CONSISTENCY WITH LOCAL PLANS AND POLICIES

The project has been designed to be consistent with the Local Coastal Plan (LCP) approved by the CCC and codified in Title 23 the San Luis Obispo County Code known as the “Coastal Zone Land Use Ordinance or CZLUO. Also applicable is the San Luis Obispo County North Coast Area Plan. The standard of review is the LCP. In addition, the project must be consistent with DPR policies in the Department Operations Manual and conditions, covenants, and restrictions contained in applicable conservation easements and grant deeds. The project is also consistent with the San Simeon State Beach General Plan’s recommendation to acquire the coastal strip (Piedras Blancas West Side Public Ownership Area) *“in order to provide public access.*”

2.10 DISCRETIONARY APPROVALS

DPR is the Lead Agency for the proposed project. The project requires Public Resources Code 5024 review, which was undertaken as part of this document.

The PBCT North Segment located between Mile Marker 64.26 (near North Lighthouse Beach) and Mile Marker 66.61 (near Arroyo de la Cruz) was approved by the Coastal Commission in 2014 as part of the Coastal Development Permit for the Piedras Blancas Highway 1 Realignment Project. A condition of that approval was a requirement to prepare CEQA compliance for this segment of the PBCT.

Table PROJ-4. Agency Permits and Approvals

AGENCY	APPROVAL
San Luis Obispo County Dept. of Planning & Building	Coastal Development Permit
Regional Water Quality Control Board	Storm Water Pollution Prevention Plan, Section 401 Water Quality Certification
United States Army Corps of Engineers	Section 404 Nationwide Permit, Section 106 Consultation
Caltrans	Scenic Conservation Easement Review, Encroachment Permits for trail related infrastructure.
California State Parks	Accessibility Plan Review

2.11 RELATED PROJECTS

Caltrans Highway 1 Relocation Project

In 2014 Caltrans obtained a Coastal Development Permit (CDP 3-13-012, Appendix B) from the CCC to realign a 2.8-mile stretch of Highway 1 north of the Piedras Blancas Lighthouse to Arroyo de la Cruz (specifically between Highway 1-mile markers 64.0 and 66.9 - see Figure 2). The purpose of the project was to relocate the Highway inland by as much as 475 feet to protect the roadway from coastal bluff erosion and potential long-term erosion impacts. Construction of the new highway was completed on August 31, 2017, and restoration of the old alignment has since occurred.

Caltrans completed a Natural Environmental Study (Hacker, 2007, amended by Moonjian, 2008) for the realignment project which included studies of the habitat and biology of the area. In addition, Caltrans completed a Historical Resources Evaluation Report (Carr, 2007) and an Archaeological Survey Report for the Piedras Blancas Realignment Project, San Luis Obispo, California (Joslin, 2006). Many of these studies extend onto land owned by State Parks and provide recent baseline environmental information for the PBCT project area. Finally, State Parks completed a natural resources inventory in 2008.

Conditions placed on the Highway 1 relocation project required Caltrans to take certain actions and to construct certain improvements that directly affect the PBCT Project:

- Caltrans relocated Highway 1 eastward through a portion of the project area. The strip of land to the west of the relocated highway and east of the old alignment (currently owned by Hearst Corporation) is to be transferred to State Parks and placed in a scenic conservation easement (except for the Piedras Blancas Motel parcel).
- The old Highway 1 roadway was removed, except on the Piedras Blancas Motel property, and the land was recontoured and revegetated to complement the natural conditions on surrounding land. On the Piedras Blancas Motel property sections of the old Highway 1 roadway will remain and will be used by State Parks for vehicle and trail access.
- Adjacent to the Piedras Blancas Motel, the relocation project resulted in Highway 1 being moved roughly 75 feet eastward at the southern end of the site and 380 feet at the northern end. Caltrans has constructed a new asphalt driveway connecting the motel's parking lot to the new Highway 1 alignment. Caltrans has installed a left turn lane on Highway 1 for north bound travelers to access the motel site.
- Under Special Condition 5 of CDP 3-13-012 Caltrans was required to provide a public access mitigation fee to fund construction of the portion of the PBCT in the highway realignment project area.
- Caltrans was required to construct a visitor-serving parking lot just south of Arroyo de la Cruz. The parking lot footprint measures approximately 100' wide with an average width of 30'. The parking lot provides parking for 19 motor vehicles plus 2 ADA van accessible spots and surfaced with aggregate base (reduced from an originally proposed 60 spots). The parking lot provides parking for coastal access and the PBCT. The parking lot will be transferred to State Park ownership for long-term maintenance per the Agreement and Irrevocable Offer to Dedicate by gift (DOC #20050 13393).
- In addition, a parking lot was constructed at the North Lighthouse Beach, at an existing pull-out spot just upcoast from the Piedras Blancas Lighthouse. This lot provides 14 parking spots and 1 ADA van accessible spot (reduced from an initial 20 planned spots).
- Caltrans undergrounded utilities along the realigned portion of Highway 1. Various culverts and bluff shoreline protection (riprap) were also removed in the project area and waterways restored to natural conditions.
- The CDP approved for the Highway 1 realignment project also approves construction of the portion of the PBCT extending north from North Lighthouse Beach to Mile Marker 66.61 near Arroyo de la Cruz.

CHAPTER 3 ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

1.	Project Title:	Piedras Blancas California Coastal Trail Project
2.	Lead Agency Name & Address:	California Department of Parks and Recreation
3.	Contact Person & Phone Number:	Katie Drexhage (805) 712-4768
4.	Project Location:	750 Hearst Castle Road, San Simeon, CA 93452
5.	Project Sponsor Name & Address:	California Department of Parks and Recreation *(District name and address)* San Luis Obispo Coast District Dan Falat, District Superintendent 750 Hearst Castle Road, San Simeon, CA 93452
6.	General Plan Designation:	REC
7.	Zoning:	R
8.	Description of Project:	This project includes the construction of 4.2 miles of accessible trail, bridges, and boardwalks to avoid impacts to sensitive resources. Mitigation in the form of on-site and off-site restoration will occur within Hearst San Simeon State Park.
9.	Surrounding Land Uses & Setting:	Refer to Chapter 3 of this document (Section IX, Land Use Planning)
10.	Approval Required from Other Public Agencies	Refer to Chapter 2, Section 2.9

1. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact", as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agricultural & Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Energy/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Haz. Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Find. of Sig.
☒ None		

DETERMINATION

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared. ☐

X. I find that, although the original scope of the proposed project COULD have had a significant effect on the environment, there WILL NOT be a significant effect because revisions/mitigations to the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE **DECLARATION** WILL be prepared. ☒

I find that the proposed project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT or its functional equivalent will be prepared. ☐

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment. However, at least one impact has been adequately analyzed in an earlier document, pursuant to applicable legal standards, and has been addressed by mitigation measures based on the earlier analysis, as described in the report's attachments. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the impacts not sufficiently addressed in previous documents. ☐

I find that, although the proposed project could have had a significant effect on the environment, because all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration, pursuant to applicable standards, and have been avoided or mitigated, pursuant to an earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, all impacts have been avoided or mitigated to a less than significant level and no further action is required. ☐

7/24/2024

Date

Environmental Coordinator

ENVIRONMENTAL ISSUES

I. AESTHETICS

ENVIRONMENTAL SETTING

The visual quality of Highway 1 in the Project area is exceptional. Highway 1 in San Luis Obispo County is designated as a State Scenic Highway and an All-American Road under the National Scenic Byways Program. Public views of the project site are from Highway 1 and from public areas located west of Highway 1 such as the Piedras Blancas Lighthouse, vista points, parking lots, and various beaches and coves located in the project area.

Existing development in the project area west of Highway 1 consists of the Piedras Blancas Motel site facilities, parking lots, and volunteer trail (trails created by visitor usage or access versus officially designated trails constructed by DPR) corridors. West of Highway 1, volunteer trails are located throughout the project area. Conditions east of the project site along Highway 1 consist of rangeland, rolling hills, periodic ranch or residential development, and distant views of the Santa Lucia Mountain range.

In the vicinity of the Project, Highway 1 has been realigned and moved further east of the project site. A scenic conservation easement covers the area between the new Highway 1 alignment and the highway's old alignment. This easement requires that the visual character of the land not be altered, although exceptions may be approved by the easement holder, which is Caltrans. The scenic conservation easement authorizes construction of the PBCT. The scenic conservation easement protects the viewshed by restricting or limiting the placement of trail infrastructure as seen from Highway 1. All of the proposed PBCT project will be located west of the new Highway 1 alignment and covered by a Hearst scenic conservation easement. Caltrans' Highway 1 Realignment Project added new bridges and resulted in portions of Highway 1 being located at a higher elevation as well as further from the bluff edge. The highway's new location provides some changes in views from the new highway corridor. The proposed Project would add new development consisting of the PBCT and support facilities, such as bridges, signs, fencing, and boardwalks. Vegetative screening may be incorporated at select sites on an as-needed basis.

This Project was developed under the guidance of the San Luis Obispo County North Coast Area Plan. The proposed project provides visitor serving facilities and is located on the west side of Highway 1. The Project conforms to the site selection criteria for the North Coast Planning Area as follows:

- the project provides visitor serving facilities;
- new development does not extend above the highest horizon line of ridgelines (coastal bluffs in this case) as seen from Highway 1, and;
- the ownership is completely within the west side of Highway 1. See Appendix C Project Design Graphic and Visual Assessments.

DPR recently reconstructed a similar boardwalk, Moonstone Boardwalk, in HSSSP in the community of Cambria. The PBCT will be constructed in the same manner as the

Moonstone Boardwalk, in conformance with the DPR Trails Handbook and the Accessibility Handbook. Photos of the boardwalk can be found in the same appendix, following the Project Design Graphic and Visual Assessments.

IMPACT ANALYSIS

Except as provided in Public Resources Code Section 21099, would the project:

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

DISCUSSION:

a) Would the Project have a substantial adverse effect on a scenic vista?

This Project would not have a significant impact on scenic resources. The Project will preserve open space and views of the ocean between Highway 1 and the ocean. The use of red-rock trail surface and earth-toned structures (bridges, viewing areas, trail lumber) will minimize the viewshed impacts. Bridges and structures have been designed to be below the horizon and below the existing highway. In addition, highway banking reduces the view of the largest structures at Arroyo del Corral. Temporary viewshed impacts may occur due to staging areas of equipment and materials. See Appendix C Project Design Graphic and Visual Assessments.

Conclusion: Impacts less than significant.

b) Would the Project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project has been designed to completely avoid impacts to trees, rock outcroppings, and historical buildings.

Conclusion: No impact.

c) Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

The PBCT has been designed in accordance with the scenic conservation easement that covers a large portion of the property where the Project will be constructed. Use of red-rock trail base and earth-toned structures will preserve and protect the outstanding visual resources of the Piedras Blancas area. Low growing native planting would be used to obscure the trails if the final designs identify any areas of concern. The use of earth-toned structures (bridges, viewing areas, trail lumber) will mitigate the viewshed impacts. Bridges and structures have been designed to be below the horizon and below the existing highway. In addition, highway banking reduces the view of the largest structures at Arroyo del Corral. These measures make the project consistent with SB 908. See Appendix C Project Design Graphic and Visual Assessments.

Conclusion: Less than significant.

d) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No lighting is associated with the Project and materials used in the Project's construction will be non-reflective and would not result in glare affecting daytime views.

Conclusion: Less than signficant.

MITIGATION MEASURES

None required.

II. AGRICULTURAL AND FOREST RESOURCES

ENVIRONMENTAL SETTING

The proposed Project footprint will be constructed within HSSSP and California State Parks properties that are zoned for recreation. Neighboring properties for the Project across Hwy 1 are used for agriculture and ranching but the Project itself will not require use or access of these properties.

The Project area contains various habitats and vegetative communities (See Section IV) and while there is Monterey pine forestland in HSSSP, the forest does not extend to where the trail is proposed to be constructed or where project operations will occur. No other agricultural or forest resources exist within the project site.

Would the project:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Convert Prime Farmland, Unique Farmland, or farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC section 12220(g)), timberland (as defined in PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environmental setting, which, due to their location or nature could result in conversion	☐	☐	☐	☒

of Farmland, to non-agricultural use or conversion of forestland to non-forest use?

DISCUSSION

a) Would the project convert Prime Farmland, Unique Farmland, or farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

According to the Department of Conservation's Farmland Finder at https://maps.conservation.ca.gov/DLRP/CIFF/ the project area does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Conclusion: No Impact.

b) Would the project Conflict with existing zoning for agricultural use or a Williamson Act contract?

The Project is located on land that is zoned for recreation. No work will occur on lands zoned for agricultural use and the recreational trail will not conflict with any nearby agricultural use or be in conflict with any WA contract.

Conclusion: No impact.

c) Would the project Conflict with existing zoning for, or cause rezoning of, forest land [as defined in PRC section 12220(g)], timberland (as defined in PRC section 4526), or timberland zoned Timberland Production [as defined by Government Code section 51104(g)]?

The Project area does not contain any zoned forestland.

Conclusion: No Impact.

d) Would the project result in the loss of forestland or conversion of forestland to non-forest use?

The Project area does not contain forestland.

Conclusion: No Impact.

e) Would the project involve other changes in the existing environmental setting,

which, due to their location or nature could result in conversion of Farmland, to

non-agricultural use or conversion of forestland to non-forest use?

The project will not involve changes to the existing environmental setting, or any changes to adjacent farmland.

Conclusion: No Impact.

STANDARD PROJECT REQUIREMENTS

None Required.

PROJECT SPECIFIC REQUIREMENT

None Required.

MITIGATION MEASURES

None Required.

III. AIR QUALITY

This section provides the setting and scope for the environmental impact analysis of the MND for air quality which contains a discussion on the environmental setting focusing on what air quality standards are present within and adjacent to the Project site. The regulatory setting of air quality is also discussed including the descriptions of federal, State, and/or local regulations that are applicable to the Project site.

For the analysis of air quality, this MND focuses on the potential for the Project to impact air quality, increase air pollution, or result in other emissions. This analysis of air quality is designed to identify and assess the potential impacts associated with both project construction and project operation.

Thresholds of significance are used to determine the significance of environmental impacts for each issue area. They are based on the Initial Study Checklist included in Appendix D of the CEQA Guidelines and modified as needed to address potential Project impacts.

ENVIRONMENTAL SETTING

For the environmental setting of the PBCT, a desktop literature review has been conducted using queries with the San Luis Obispo County Air Pollution Control District (SLOAPCD) CEQA Air Quality Handbook and the California Air Resources Board emissions data.

The Project site is located in San Luis Obispo County, which is part of the South Central Coast Air Basin, under the jurisdiction of SLOAPCD and United States Environmental Protection Agency (EPA) EPA. The Project site falls under the regional jurisdiction of the SLOAPCD, whose main purpose is to enforce local, state, and federal air quality laws and regulations. Their primary responsibility is controlling air pollution from stationary sources.

Pursuant to the federal Clean Air Act, the SLOAPCD is required to reduce emissions of criteria pollutants for which the Basin is in nonattainment. San Luis Obispo County has relatively clean air due to frequent rains, ocean winds, low levels of commuter traffic, and a small industrial base. Because of these conditions, San Luis Obispo County is currently in attainment with most California standards (Table AIR-1). However, the County is considered a non-attainment area for suspended particulate matter (PM_{10} or particles with an aerodynamic diameter of 10 microns or less) and 8-hour ozone under the California Clean Air Act. San Luis Obispo County, the major sources of emissions are combustion (from automobiles and diesel engines), commercial and industrial processes, and residential buildings (California Air Resources Board, 2017).

Table AIR-1 San Luis Obispo County Attainment Status

POLLUTANT	AVERAGING TIME	STATE STATUS	NATIONAL STATUS
Suspended particulate matter (PM_{10})	24-hr and Annual	Non-attainment	Unclassified
Fine suspended particulate matter ($PM_{2.5}$)	24-hr and Annual	Attainment	Unclassified/Attainment
Ozone	1-hr.	Non-Attainment	No federal standard
Ozone	8-hr.	Non-Attainment	Unclassified
Carbon monoxide	1-hr. and 8-hr.	Attainment	Unclassified/Attainment
Nitrogen-dioxide	1-hr. and Annual	Attainment	Unclassified/Attainment
Sulfur dioxide	1-hr. and 24-hr.	Attainment	Unclassified/Attainment
Sulfates	24-hr.	Attainment	No federal standard
Lead	30-day	Attainment	Unclassified/Attainment
Hydrogen sulfide	1-hr.	Attainment	No federal standard
Visibility reducing particles	8-hr.	Unclassified	No federal standard

Data obtained from https://www.arb.ca.gov/desig/adm/adm.htm, latest available data from September 2021

REGULATORY SETTING

The following section includes the regulatory framework surrounding air quality as part of the Project and impact analysis. Information regarding the regulatory setting was compiled by using federal and state laws and statutes on the protection of air quality.

FEDERAL REGULATIONS

Federal Clean Air Act

The Clean Air Act (Amended 1990) defines the Environmental Protection Agency's responsibilities for protecting and improving the nation's air quality and the stratospheric ozone layer. The act establishes standards and regulations for air quality and emissions as well as ozone protection.

STATE REGULATIONS

California Clean Air Act

The California Clean Air Act of 1988 provides a framework for air quality planning and other actions to meet the health-based State Ambient Air Quality Standards. Air quality standards established under the California Clean Air Act are more stringent than those set through the Federal Clean Air Act. Emission reductions from mobile sources (such as automobiles themselves) are the responsibility of the California Air Resources Board, while emission reductions from stationary sources and some uses of mobile sources are the responsibility of the air quality management and air pollution control districts.

The California Air Resources board sets statewide rules for mobile and many stationary sources, as well as toxic air pollutants; the air districts set rules for stationary sources and permits in their areas, and sometimes have rules that affect vehicle fleets and construction-related activities.

In the following section, impacts to air quality are addressed under these thresholds and mitigation measures specific impacts are designed in order to avoid or reduce impacts below levels of significance.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

For the environmental impact analysis of the Project, both direct and indirect impacts to air quality from construction and operational activities are considered. These impacts include the potential for the Project to result in air pollution or emissions or conflict with air quality plans and standards.

Note: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

		POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	☐	☐	☐	☒
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☐	☒

DISCUSSION:

The SLO APCD's 2012 CEQA Air Quality Handbook, with administrative updates in 2017, 2021/2022, 2023, assists lead agencies in assessing the potential air quality impacts from new development. The Handbook defines the criteria used by the APCD to determine when an air quality analysis is necessary, the type of analysis that should be performed, the significance of the impacts predicted by the analysis, and the mitigation measures needed to reduce the overall air quality impacts.

The Handbook establishes thresholds of significance for various types of development and associated activities. According to the Handbook, a project with grading in excess of 4.0

acres and moving 1,200 cubic yards of earth per day can exceed the construction threshold for respirable particulate matter (PM_{10}). In addition, project construction with the potential to emit 137 lbs/day or 2.5 tons per quarter of ozone precursors (reactive organic gases and oxides of nitrogen combined) would result in potentially significant air quality impacts (Table AIR-2).

Table AIR-2. Thresholds of Significance for Construction

Pollutant	Daily	Quarterly Tier 1	Quarterly Tier 2
ROG+NOx (combined)	137 lbs	2.5 tons	6.3 tons
Diesel Particulate Matter	7 lbs.	0.13 tons	0.32 tons
Fugitive Particulate Matter (PM10), Dust[2]		2.5 tons	

Source: SLO County APCD CEQA Air Quality Handbook, page 2-2.

Notes:

Daily and quarterly emission thresholds are based on the California Health & Safety Code and the CARB Carl Moyer Guidelines.

Any project with a grading area greater than 4.0 acres of worked area can exceed the 2.5-ton PM10 quarterly threshold.

For operational emissions, the Handbook establishes the following thresholds of significance:

Table AIR-3. Thresholds of Significance for Operational Emissions

Source: San Luis Obispo County APCD CEQA Air Quality Handbook, with administrative updates 2017, 2021/2022, and 2023, Table 2-1, accessed 4/29/24 at slocleanair.org/rules-regulations/land-use-ceqa/ceqahandbook.php.

One of the main concerns with development that involves grading is the generation of wind-borne fine particulates (PM10), which in turn is a function of the wind erodibility of the underlying soils. The wind erodibility index is a numerical value indicating the susceptibility of soil to wind erosion, or the tons per acre per year that can be expected to be lost to wind erosion.

There is a close correlation between wind erosion and the texture of the surface layer, the size and durability of surface clods, rock fragments, organic matter, and a calcareous reaction. Soil moisture and frozen soil layers also influence wind erosion. According to the NRCS Soils Survey, the project site is located on soils that have been given the following wind erodibility ratings. A lower number represents a higher potential for wind erosion.

Table AIR-4. Wind Erodibility of Soils on the Project Sites

Soil	Portion of Soils Found on Project Site	Quantitative Rating[1]	Qualitative Rating
Capistrano sandy loam, rolling	5%	3	Higher
Concepcion loam 2 to 5 percent slopes	47%	5	Moderate
Capistrano sandy loam, undulating	38%	3	Higher
Gazos-Lodo clay loams, 15 to 30 percent slopes	2%	6	Lower

Source: NRCS Web Soil Survey, 2023. Notes: On a scale of 1 to 8, where soils assigned to group 1 are the most susceptible to wind erosion, and those assigned to group 8 are the least susceptible.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Typical sources of emissions for public facilities include heating, cooking, solvent/paint use, and lawn and yard care equipment and vehicular traffic; these are not elements of this project. While construction would generate temporary emissions, operation of the proposed Project would not include any source of visible emissions, such as intentional fire/burning or manufacturing.

Air quality impacts for the proposed facility were calculated using the online California Emissions Estimator (caleemod.com, accessed 4/29/24 and 5/20/24). The Estimator uses widely accepted emissions estimates to model emissions from construction and operation of new stationary sources.

Operational Emissions. Table 1-1 of the Handbook provides screening criteria based on the floor area of projects that would normally exceed the operational thresholds of significance for greenhouse gases and ozone precursors. The project size is well below the project size that would normally generate emissions that exceed the thresholds for ozone precursors.

Table AIR-5. Unmitigated Emissions of the Proposed Project Site

	ANNUAL EMISSIONS (TONS/YR)	
POLLUTANT	**CONSTRUCTION**	**OPERATION**
Carbon monoxide (CO)	22.27	1.62
Nitrogen oxides (NOx)	24.94	0.234
Particulate matter (PM_{10})	1.06	0,004
Particulate matter ($PM_{2.5}$)	.007	0.004
Reactive organic gases (ROG)	2.68	0.156
Sulfur oxides (SO_2)	0.033	1.004

Source: California Emissions Estimate Model (CalEEMod), 5/20/24.

Based on the California Emissions Estimate Model (CalEEMod) results shown in Table AIR-5 above, emissions from construction and operation of the proposed Project would not have a negative impact on air quality beyond the thresholds of significance. Implementation of Standard Project Requirements will ensure impacts on air quality would be less than significant. Standard Project Requirements are detailed below.

Conclusion: No Impact.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Based on the CalEEMod analysis results, the Project would have a less than significant impact on increases of any criteria pollutants and would not result in cumulatively considerable net increases of any criteria pollutants. The Project does not include the operation of woodstoves or hearths and would not emit PM_{10} at levels that would exceed the County of San Luis Obispo's cumulative threshold of 550 pounds per day. The project will be designed consistent with San Luis Obispo County's standard design criteria and the California Green Building Code.

While unlikely to result in net increases in criteria pollutants, trail construction activities in exposed coastal areas nevertheless could result in increases of windblown dust. Incorporation of Standard Project Requirement AQ-1 as noted below, will minimize the potential for fugitive dust to result from the Project.

Conclusion: Less than signficant Impact.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Sensitive receptors are people or other organisms that may have a significantly increased sensitivity or exposure to air pollution by virtue of their age and health (e.g. schools, day care centers, hospitals, nursing homes), regulatory status (e.g. federal or state listing as a sensitive or endangered species), or proximity to the source.

The closest sensitive receptors to the PBCT portion of the project are visitors at the elephant seal viewing area, visitors and State residents at the Piedras Blancas Motel and residents on the inland side of Highway 1 near the motel.

Conclusion: No Impact.

d) *Would the project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?*

The project is not anticipated to create any emissions and/or objectionable odors of significance.

Construction activities have the potential to generate short term emissions that could adversely affect sensitive receptors. However, construction of the PBCT would involve the use of hand tools or small gasoline powered equipment and is not expected to generate emissions that would adversely impact sensitive receptors.

Construction Related Emissions. Construction equipment for the PBCT would consist of hand tools (shovels, rakes, pulaskis, and wheelbarrows). Some power tools (such as vibrating plate, compactors, small vehicles such as quads and miniature tracked auger drivers) would be used for trail construction. The large bridge at Arroyo del Corral may require a crane or helicopter, depending on the final design.

The APCD CEQA Air Quality Handbook provides screening emissions rates to help determine whether construction activities will exceed these thresholds. Table 10 compares the estimated construction emissions using these screening emissions rates with the thresholds of significance. Table AIR-6 suggests that construction related emissions will not exceed APCD thresholds and therefore no mitigation is required. Nevertheless, Standard Project Requirement AQ-2 will ensure that construction equipment operates at their most efficient levels.

Conclusion: No Impact.

Table AIR-6. Comparison of Project Components With APCD Screening Thresholds for Ozone Precursors

APCD CEQA Air Quality Handbook Land Use Category	Size of Urban/(Rural) Project Expected to Exceed the APCD Daily Ozone Precursor Significance Threshold	Project Size

PBCT	None	9.5 acres of disturbance, completed in phases

Source: APCD 2012 CEQA Air Quality Handbook, Table 1-1

Naturally Occurring Asbestos (NOA). According to the APCD CEQA Air Quality Handbook, NOA has been identified as a toxic air contaminant by the California Air Resources Board (CARB). Under the CARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any grading activities a geologic evaluation should be conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the District. If NOA is found at the site, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD.

STANDARD PROJECT REQUIREMENTS

AQ-1: Dust Management

a. During dry, dusty conditions, all active construction areas will be lightly sprayed with dust suppressant to reduce dust without causing runoff.

b. All trucks or light equipment hauling soil, sand, or other loose materials on public roads will be covered or required to maintain at least two feet of freeboard.

c. Excavation and grading activities will be suspended when sustained winds exceed 15 miles per hour (mph), instantaneous gusts exceed 25 mph, or when dust occurs from remediation related activities where visible emissions (dust) cannot be controlled by watering or conventional dust abatement controls.

AQ-2: Maintenance of Equipment

All gasoline-powered equipment will be maintained according to the manufacturer's specifications, and in compliance with all State and federal requirements.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

IV. BIOLOGICAL RESOURCES

This section provides the setting and scope for the environmental impact analysis of the MND for Biological Resources, which contains a discussion on the environmental setting focusing on what resources are present within and adjacent to the Project site. The regulatory setting of biological resources is also discussed including the descriptions of federal, state, and/or local regulations that are applicable to the Project site. For the analysis of biological resources, this MND focuses on the potential for the Project to impact special status plants and vegetative communities, special status wildlife and their associated habitat, critical habitats, and any present jurisdictional wetlands. This analysis of biological resources is designed to identify and assess the potential impacts associated with both Project construction and project operation.

Thresholds of significance are used to determine the significance of environmental impacts for each issue area. They are based on the Initial Study Checklist included in Appendix D of the CEQA Guidelines and modified as needed to address potential Project impacts.

This section is written with separate analyses for wetlands, plants, wildlife. Each analysis considers the environmental setting and presence of both plant and wildlife resources as well as the regulatory setting and thresholds of significance that are used to determine impacts on biological resources.

Sensitive biological resources that have the potential to occur within or near the proposed project sites are shown in Figures BIO-1, BIO-2, BIO-3, and BIO-4. Special-status species (sensitive species) are defined as plants and animals that are legally protected or that are considered sensitive by federal, state, or local resource conservation agencies and organizations. Specifically, this includes species listed as State or federally Threatened or Endangered, those considered as candidates for listing as Threatened or Endangered, species identified by the U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) as Species of Special Concern (SSC), animals identified by CDFW as Fully Protected or Protected (FP, P), and plants considered by the California Native Plant Society (CNPS) to be rare, threatened, or endangered. Designated critical habitat for federally listed species is also included. Additionally, all marine mammals are protected under the Marine Mammal Protection Act and protected migratory bird species are protected by USFWS's Migratory Bird Treaty Act.

All special-status species and their habitats were evaluated for potential impacts from the PBCT. Existing available data was collected and reviewed to determine the proximity of special status plants, animals, and their habitats to the project area. Queries of the California Department of Fish and Wildlife's California Natural Diversity Database (CDFW 2023), the California Native Plant Society's On-line Inventory, Eighth Edition (CNPS 2022), and the USFWS IPAC program (USFWS 2023) were conducted for special-status species and habitats within the Weott and eight surrounding United States Geological Society (USGS) quadrangle maps.

General and species focused botanical and wildlife surveys were conducted by SLOCD Natural Resources Program staff; Katie Drexhage (Senior Environmental Scientist), Mike Walgren (Senior Environmental Scientist Specialist), and Brad Collins (Environmental Scientist) in April and May, 2023.

Special-status biological resources including wetlands, plant, and animal species are described below along with their potential to occur within the project area.

ENVIRONMENTAL SETTING

For the environmental setting of the PBCT, a desktop literature review was conducted using queries with the CDFW Natural Diversity Database (CNDDB) as well as the USFWS IPAC and using spatial data from CDFW and USFWS as well as spatial data for delineated wetlands from the United States Army Corps of Engineers (ACOE). This desktop review was conducted as a basis of analysis for the project.

The PBCT would be located in a temperate region of California's central coast that supports the intermix of many northern and southern habitats, creating a high diversity of wildlife and plant life. With the regional variation of topography, geology, and soils, prominent communities of grasslands, oak woodlands, pine forests, coastal scrub, and maritime chaparral comprise the regional landscape of the San Simeon Coast and Santa Lucia Mountains from Ragged Point south to the town of Cambria, CA.

This high diversity of biological resources is important in the planning of the project as a variety of special status species and sensitive habitats are found both within the project sites and the adjacent landscape. The Project Sites are located within the Coastal Zone, which is regulated by the State and/or local government (see III.II Regulatory Setting).

Wetlands

The project contains emergent, freshwater wetlands that will fall under the jurisdiction of ACOE, RWQCB, and the CCC. Wetlands in this area were recently delineated by Caltrans for the Highway 1 Re-alignment Project. Portions of the Project will be constructed through these wetlands; however, in these locations, boardwalks will be installed to reduce impacts to the wetlands to the maximum extent practical. Construction within the delineated wetland area will be timed to occur during the summer months when these areas are dry and/or not inundated.

Plants/Vegetative Communities

Within the project sites and surrounding landscape, numerous plant communities are found – most notably grasslands and coastal scrub communities. The project footprint itself includes disturbed areas from Caltrans' Highway 1 re-alignment project.

Wetland Vegetation

Within the project area wetland plant communities occur in conjunction with riparian corridors and streams, and in freshwater seeps. Generally, streams have embedded wetlands or riparian woodland within the main channel. Near the coast, these wetlands have a salt influence.

Pioneer Dunes

Pioneer dunes are those dunes located nearest to the shoreline. They are characterized by a high rate of sand movement which exceeds the rate of colonization by vegetation. This region of the sand dunes is subject to extremely harsh environmental factors which greatly reduce plant life and diversity as well as provides uniquely adapted assemblages of plants. Such conditions include desiccation from wind and salt spray, salt and sand abrasion, high reflectivity and surface temperatures, constant fog, fluctuating tides, high salt content in the soils, low soil fertility and water holding capacity, and constant burial, excavation, and re-burial of root systems.

The plants that grow on the foredunes are often called dune stabilizers and are very tolerant of the above-mentioned environmental pressures. Foredune plant species are often prostrate or creeping along the soil surface, have small succulent leaves with pubescence, are light in color, and have a small surface to volume ratio. They also typically have a large tap root, a complex shallow or surface root system and generally root at the nodes.

Within the project area, pioneer dunes occur at several scattered beaches, generally landward of coastal strand areas. The most obvious pioneer dunes in the vicinity of the project are found at Point Piedras Blancas, at Arroyo del Corral, and near the mouth of Arroyo de la Cruz.

Coastal Sea Bluff Scrub

Coastal sea bluff scrub occurs in large stands, forming substantial, discontinuous pockets along the coastal terraces and the steep bluff faces. The immediate proximity to the coast subjects these slopes to a variety of harsh environmental conditions. Here the increased salt spray and wind, as well as the eroding parent material are all contributing factors to the species composition and average height of the shrub layer. The shrubs are typically prostrate and mound like. In general, where erosion is prevalent, coastal sea bluff scrub is more common.

Coastal Scrub

Coastal scrub, or ‘soft chaparral,’ is most commonly associated with steep slopes and moderately xeric environments. These areas typically have a shallow soil profile and water is most commonly available in the upper horizons during the winter and spring. Many coastal scrub plants are semi-woody, multi branched and drought deciduous. Coastal scrub communities are adapted to fires; many coastal scrub species have volatile

oils, can stump sprout, or have seeds that require fire scarification and enriched nutrient availability before germination can occur.

Coastal scrub typically dominates north-facing slopes, and also occupies ditches, ravines and roadsides throughout the project area.

Native Grasses/Coastal Terrace Prairie

Along the bluffs there are large patches of native grasslands. The remnant grasslands occupy the flat coastal terraces and the shallow slopes below the coastal scrub and are dominated by native bunch grasses such as *Stipa pulchra* (Purple needle grass), *Stipa lepida* (Slender needle grass), *Deschampsia cespitosa* (Tufted hairgrass), and *Danthonia californica* (California oatgrass). Other common native species such as *Elymus glaucus* (Blue wild-rye) and *Elymus triticoides* (Beardless wild-rye) occur in and adjacent to wetlands as well as along ditches and roadsides. *Hordeum brachyantherum* (Meadow barley) is relatively uncommon but occurs in patches of wetland communities throughout the San Simeon coast.

Coastal Prairie/Mixed Grasslands

The majority of the grasslands are actually mixed grasslands and coastal prairies. The dominant cover is a combination of both native and non-native species. The most common native grass is *Stipa pulchra.* Native grasses typically form a co-dominant association with non-native species such as *Avena barbata, A. fatua, L. multiflorum*, *Briza maxima*, and a variety of *Bromus* spp. While the native grasses are spread throughout the mixed grassland hillsides in great abundance, they usually form much thicker stands in the lower areas with gradual slopes.

Central Maritime Chaparral

Maritime chaparral communities occur in windswept coastal areas throughout central and northern California. This community type typically inhabits the sandy soils of old stabilized sand dunes, but in northwestern San Luis Obispo County, they occur on fine grained clays and serpentine-derived soils. In the project area, maritime chaparral forms dense stands immediately south of Arroyo de la Cruz and north of Arroyo de los Chinos.

Invasive Grasses and Other Non-Native Plants

The non-native grasslands host a variety of annual grass species and dominance of particular genera vary from site to site. The most common non-native grassland species that are distributed throughout the property are: *Vulpia myuros* (Fescue), *Lolium multiflorum* (Wild rye), *Avena barbata* (Slender wild oats), *A. fatua* (Wild oats), *Bromus hordeaceus* (Soft chess brome), *Bromus diandrus* (Ripgut brome), and *Briza maxima* (Rattlesnake grass). There are many native species of grass distributed throughout the non-native grasslands, but they never establish dominance over the non-native species. The grasslands form broad ecotones with the coastal scrub community.

Along the edges of the highway and other roads there are many common ruderal species such as *Brassica rapa* (Black mustard), *Conium maculatum* (Poison hemlock), *Foeniculum vulgare* (Fennel), *Hirschfeldia incana* (Perennial mustard), *Carduus pycnocephalus* (Italian thistle) and *Cirsium vulgare* (Bull thistle). Annual grasses such as *Bromus diandrus, Bromus hordeaceus*, *Avena barbata, A. fatua*, and *Lolium multiflorum* are also common along the extent of roads. *Baccharis pilularis* is the dominant shrub along roadsides and is a common native species in disturbed areas.

There are many patches of disturbance throughout the San Simeon coastal property. Grasslands will often have intermittent patches dominated solely by thistles. There are central regions of the property that now occur along the past highway distribution. These areas are highly invaded by species such as *Cynodon dactylon* (Bermuda grass), *Trifolium angustifolium* (Narrow-leaf crimson-clover), *Hirschfeldia incana, Brassica rapa, Melilotus indica* (Yellow sweet-clover), *Conium maculatum*, and *Hirschfeldia incana*.

Special-Status Plant Species

For the PBCT, the CNDDB, CNPS[1], and USFWS have identified specific special status plant species as occurring or having a potential to occur within the Burnett Peak, Burro Mountain, Pico Creek, Piedras Blancas, San Simeon, and Villa Creek USGS 7.5-minute quadrangles. These species, including their listing status are identified in Appendix D.

Of the species identified in these quadrangles, 30 have been reviewed as having the potential to occur in the project sites by CNDDB and IPAC, and based on suitable habitat adjacent to the project sites assessed during biological desktop review and field surveys. These species are discussed in Table BIO-1. Additionally, the Project site contains Coastal Prairie which is considered to be a protected Environmentally Sensitive Habitat Areas (ESHA) by the CCC.

Table BIO-1. Potential Impacts to Listed Plants Within/Near the Project Area

Species and Common Name	Status	Habitat	Habitat Present?	Rationale
Abronia maritima **(Red Sand Verbena)**				**No Impact.** Project will avoid suitable habitat (i.e., coastal dunes).
Allium hickmanii **(Hickman's Onion)**	CNPS 1B.2		No	**No Impact.** This species is not present within the Project area.
Aphyllon robbinsii **(Robbin's broomrape)**	CNPS 1B.1	Associated with sea bluff scrub, possibly coastal dunes	Yes	**No Impact.** Project will avoid areas of suitable habitat.
Arctostaphylos cruzensis **(Arroyo de la Cruz Manzanita)**	CNPS 1B.2	Sea bluff scrub, coastal scrub, and coastal terrace grasslands	Yes	**No Impact**. One plant occurs in the project area; however, the Project has been designed to avoid this species**.**
Arctostaphylos hooveri **(Hoover's manzanita)**	CNPS 4.3	Broadleafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest	No	**No Impact.** Suitable habitat does not occur in Project area.
Arenaria paludicola **(Marsh sandwort)**	FE, SE, CNPS 1B.1	Sandy openings in marshes and swamps	No	**No Impact.** Suitable habitat does not occur in Project area.
Astragalus nuttallii **var. *nuttallii* (Nuttall's Milk Vetch)**	CNPS 4.2	Sea bluff scrub and coastal dunes	No	**No Impact.** Species is associated with dunes. Suitable habitat does not occur in Project area.
Baccharis plummerae ssp. glabrata **(San Simeon baccharis)**	CNPS 1B.2	Coastal scrub	Yes	**No Impact.** This species is not present within the Project area.
Bloomeria humilis **(Dwarf goldenstar)**	CNPS 1B.2, CR	Associated with coastal terrace grassland, chaparral edges (in association with *Calochortus luteus* in coastal areas of San Simeon).	No	**No Impact.** Project area does not provide suitable prairie habitat.
Calochortus clavatus **var. *recurvifolius*** **(Arroyo de la Cruz Mariposa Lily)**	CNPS 1B	Coastal grassland fields in clay soil.	Yes	**No impact**. Hoover writes "a very local dwarfed variant found 1.8 miles north of Arroyo de la Cruz, in clay soil of a coastal field. Specimens at the Hoover Herbarium, Cal Poly SLO, are from just south of Arroyo de la Cruz to about Arroyo de los Chinos. The species was not detected
Calystegia subacaulis episcopalis **(San Luis Obispo County morning glory)**	CNPS 4.2	Chaparral, cismontane woodland, coastal prairie, grassland	No	**No Impact.** Suitable **h**abitat does not occur in the project area.
Carex obispoensis **(San Luis Obispo sedge)**	CNPS 1B.2	Springs, streamsides, often on serpentine seeps	Yes	**No impact.** While the plant occurs in the nearby area (north of Arroyo
Castilleja densiflora **ssp. *Obispoensis*** **(San Luis Obispo owl's clover, SLO Indian paintbrush)**	CNPS 1B.2	Meadows and seeps, coastal grassland, sometimes serpentine and/or sandy soils	Yes	**No Impact.** This species is not present within the Project area.

Ceanothus maritimus **(Maritime ceanothus)**				
Cirsium occidentale* var. *compactum **(Compact cobwebby thistle)**	CNPS 1B.2	Associated with coastal dunes, bluffs, coastal prairies, coastal scrub, and chaparral.	Yes	**Less than significant impact with mitigation.** Individuals of this species cannot be avoided by the Project as they are abundant in this area. However, replanting impacted individuals at a mitigation ratio agreed upon with the permitting regulatory agencies will reduce
Chenopodium littoreum **(coastal goosefoot)**	CNPS 1B.2	Coastal dunes	No	**No Impact.** Suitable habitat does not occur in the Project area.
Deinandra paniculata **(paniculate tarplant)**	CNPS 4.2	Coastal scrub, valley and foothill grassland, vernal pools	No	**No Impact.** Suitable habitat does not occur in the Project area.
Dudleya blochmaniae* ssp. *Blochmaniae **(Blochman's dudleya)**	CNPS 1B.1	grassland. Found on open rocky slopes with soils that are often dominated by clay or	No	**No Impact.** This species is not present within the Project area.
Erigeron sanctarum **(saint's daisy)**	CNPS 4.2	Coastal scrub, chaparral, cismontane woodland	No.	**No Impact.** Species not detected during surveys and is associated with chaparral and woodlands habitat; suitable habitat is not present
Hosackia gracilis **(harlequin lotus)**	CNPS 4.2	Coastal prairie, coastal scrub, meadows and seeps, marshes and swamps, coastal bluff scrub, cismontane woodland	Yes	**No Impact.** This species is not present within the Project area.
Juncus acutus* ssp. *leopoldii **(Southwestern spiny rush)**	CNPS 4.2	Moist saline places, coastal dunes, salt marshes, alkaline seeps	No	**No Impact.** This species is not present within the Project area.
Lomatium parvifolium **(Small Leaved Lomatium)**	CNPS 4.2	Clay soils in the San Simeon coast area.	Yes	**No Impact.** This species is not present within the Project area.
***Lasthenia californica ssp. macrantha* (perennial goldfields)**	CNPS 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub	Yes	**No Impact.** This species is not present within the Project area.
Microseris paludosa **(marsh microseris)**	CNPS 1B.2	Marsh habitat found in Coastal scrub, valley and foothill grassland. Cismontane woodland	No	**No Impact.** Suitable habitat does not occur in the Project area.
Navarretia fossalis **(spreading navarretia)**	FT, CNPS 1B.1	Chenopod scrub, marshes and swamps, playas, vernal pools	No	**No Impact.** Suitable habitat does not occur in the Project area.
Pedicularis rigginsiae **(Arroyo de la Cruz lousewort)**	CNPS 1B.1	Maritime chaparral	Yes	**No Impact.** This species is not present within the Project area.
Pinus radiata **(Monterey pine)**	CNPS 1B.1	Closed-cone coniferous forests, oak woodlands	No	**No Impact.** This species is not present within the Project area.
Ribes sericeum **(Santa Lucia gooseberry)**	CNPS 4.3	Coastal scrub, forests	No	**No Impact.** This species is not present within the Project area.
Sanicula hoffmannii **(Hoffman's sanicle)**	CNPS 4.3	Coastal bluff scrub, coastal scrub, cismontane woodland, chaparral, lower montane coniferous forest	No	**No Impact.** This species is not present within the Project area. This species is associated with rocky slopes on coastal slopes.
Sanicula maritima **(Adobe sanicle)**	CNPS 1B.1	Coastal prairie, grassland, seeps, meadows, clay or serpentine outcrops	Yes	**No impact.** While plants do occur north of Arroyo de la Cruz, no plants are found in the Project area.

FE – Federally Endangered
FT – Federally Threatened
SE – State Endangered
ST – State Threatened
CR – California rare species

CNPS Rare Plant Ranks
1B.1 – Rare throughout range. Seriously threatened in CA.
1B.2 – Rare throughout range. Moderately threatened in CA.
4.2 – Limited distribution throughout CA. Moderately threatened in CA
4.3 – Limited distribution throughout CA. Not very threatened in CA

Special-Status Wildlife Species

Within the project sites and surrounding landscape, suitable habitat for numerous wildlife species is present – most notably grasslands, coastal scrub, coastal bluff scrub, and riparian. The project footprint itself would include ruderal areas intermixed with coastal scrub. These areas may have the potential to provide habitat for certain special status wildlife species.

CNDDB, CNPS1, and USFWS have identified specific special status wildlife species as occurring or having a potential to occur within the Burnett Peak, Burro Mountain, Pico Creek, Piedras Blancas, San Simeon, and Villa Creek USGS 7.5-minute quadrangles. These species, including their listing status are identified in Appendix D.

Of the species identified in these quadrangles, 23 have been reviewed as having the potential to occur in the project sites by CNDDB and IPAC and based on suitable habitat adjacent] to the project sites assessed during biological desktop review and field surveys. These species are discussed in Table BIO-2 below:

Table BIO-2. Potential Impacts to Listed Animals within/Near the Project Area

Species and Common Name	Status	Habitat	Habitat Present?	Discussion/Conclusion
			Invertebrates	
Smith's Blue Butterfly (*Euphilotes enoptes smithii*)	FE	Coastal bluff scrub and coastal dunes with seacliff buckwheat (*Eriogonum parvifolium*) and coastal buckwheat (*Eriogonum latifolium*).	Yes	**No Impact.** Not found on State property during 2006-2007 focused surveys, nor during the following 10 years of incidental observations. The host plants are few in number along the PBCT and the trail was designed to avoid these plants.
Vernal Pool Fairy Shrimps (*Branchinecta lynchi)*	FT	Vernal pools found in grasslands and prairies.	No	**No Impact.** Caltrans work in the area (Hacker, 2007) surveyed for branchiopods in the road realignment project area with negative results. No potential habitat exists in the Project areas.
			Amphibians	
California Red-Legged Frog (*Rana draytonii*)	FT, SSC	Streams and ponds found in grasslands, cismontane woodlands and forests, and agricultural areas.	Yes	**Less Than Significant Impact.** Species has been observed in waterways near the Project site and the Project is within dispersal range of this species. Construction will be timed to occur during the dry season to avoid the breeding season and/or times when this species is more likely to be found dispersing through the Project site.
California tiger salamander *(Ambystoma californiense)*	FT	Ponds, vernal pools and other water bodies found in grasslands, cismontane woodlands and forests, and agricultural areas.	No	**No Impact.** This species has not been documented within the Project site. This species is not found along the coast of San Luis Obispo County.
Coast range newt *(Taricha torosa)*	SSC	Wet areas in cismontane woodlands and forests, chaparral, and rolling grasslands.	No	**No Impact.** Suitable habitat is not found in the Project area.
Foothill yellow-legged frog (*Rana boylii*)	FC	Valley-foothill hardwood, valley-foothill hardwood-conifer, valley-foothill riparian , ponderosa pine, mixed conifer, mixed chaparral and wet meadows. The frog is closely associated with streams and is rarely observed far from the water's edge.	No	**No Impact.** Surveys have not detected this species in the creeks within the Project site. While frogs have been documented in Little Pico Creek and Arroyo de la Cruz, they are not expected in the small creeks crossed by the proposed PBCT as this species is found inland and the Project will impact coastal habitat.
San Simeon Slender Salamander (*Batrachoseps incognitos*)	G2S2	Open and closed forests of yellow pine, laurel, sycamore, and oak woodland.	No	**No Impact.** Suitable habitat does exist within the Project site.
			Reptiles	
Southwestern Pond Turtle (*Actinemys marmorata pallida*)	SSC, FC	Rivers, lakes, ponds, and other water sources.	Yes	**No Impact.** This species has been observed in creeks and one culvert near the Project site. Trail features including bridges, are designed to avoid impacts to riparian and aquatic habitat. Bridges will be free spanning over the creeks in the project site therefore dewatering of creeks is not required and impacts to the species are not anticipated.

Two-Striped Garter Snake (*Thamnophis hammondi*)	SSC	Streams and ponds in chaparral, oak woodland, and forest habitats up to 8,000 feet elevation.	Yes	**No Impact.** This species has not been observed in the Project area by DPR Environmental staff, Caltrans staff, or others during field surveys. Suitable habitat exists; the closest occurrence of this species was in 2008 at the mouth of San Simeon Creek approximately 9.5 miles south of the project site.
			Fish	
Tidewater Goby (*Eucyclogobius newberryi*)	FE, SCC, CH	Brackish lagoons, estuaries, and marshes.	Yes	**No Impact.** This species is found in coastal waterways. Arroyo del Corral is critical habitat for this species. The Project includes bridges that span waterways to avoid aquatic habitat. Bridge construction will occur during the summer and will not require dewatering; therefore, no impacts to this species or its critical habitat are anticipated.
Steelhead – South-Central California Coast ESU (*Onchorhynchus mykiss*)	FT	Coastal rivers and streams where upstream pooling habitat with still waters.	Yes	**No Impact.** This species is found in coastal waterways. The Project includes bridges that span waterways to avoid aquatic habitat. Bridge construction will occur during the summer and will not require dewatering; therefore, no impacts to this species are anticipated
			Mammals	
Harbor Seal (*Phoca vitulina*)	Federally protected under the Marine Mammal Protection Act (MMPA)	Coastal waters, islands, and estuaries, and often rest on sandbars, beaches, and rocky shores.	No	**No Impact.** The PBCT has been designed to avoid impacts to this species by locating the trail away from haulouts. The Project includes signage and posted orders to keep visitors on trail. One haulout occurs seasonally at the south Piedras Blancas beach; however, the trail route will divert visitors away from these areas, avoiding disturbance to this species that could occur from human presence/silhouettes.
Northern Elephant Seal (*Mirounga angustirostris*)	FP, Federally protected under MMPA	Coastal waters, islands, and estuaries, and breed and give birth on sandbars, beaches, and rocky shores.	Yes	**Less than Significant Impact.** The PBCT has been designed to avoid close proximity to haulouts, although elephant seals appear tolerant of close human observations. The Project includes signage and posted orders to keep visitors on trail. Impacts could occur if park visitors violate posted orders. The entire length of the project has beaches with haulout and pupping sites. The Project includes multiple design elements to avoid seal-human interactions or seal harassment including fencing, posted orders/signage, and a viewing platform to allow human observation of this species from a safe distance.
California Sea Lion (*Zalophus californianus*)	Federally protected under the MMPA	Coastal waters, beaches, rocky shores.	No	**No impact.** Observed onshore occasionally (1 to few individuals) at the beach on the southeast side of Point Piedras Blancas. Offshore, large numbers occur over 3,000 ft from the project on the offshore islets near Point Piedras Blancas. Species not found within Project site.
			Birds	
Western Snowy Plover -Pacific Coast Population (*Charadrius alexandrinus nivosus*)	FT, SSC	Sand, dry mud or salt flats on the edged of ocean beaches, rivers, lakes, or ponds.	No	**No Impact.** The trail was designed to avoid suitable habitat for this species (e.g., dunes, beaches). The Project will be constructed on bluff tops and other habitat types inland from dune and/or beach habitat.

California Brown Pelican (*Pelicanus occidentalis californicus*)	FP	Coastal waters, rocky, sandy, or vegetated islands or beaches.	No	**No Impact.** Communal roosts occur at the southeast beach of Point Piedras Blancas, the mouth of Arroyo de la Cruz, and the seabird roosting rocks off the "Junge Property" immediately downcoast of San Simeon on the ocean side of Hwy 1. However, the PBCT is aligned east of the beach and avoids roosts.
Burrowing Owl (*Athene cunicularia*)	SSC	Grasslands, road cuts, and open areas.	Yes	**Less than Significant Impact.** Caltrans environmental staff report one owl seen using a ground squirrel burrow just inland of Highway 1 south of Arroyo del Corral. Tom Edell (Caltrans) reports several sightings south of the elephant seal viewing area, but it is unclear if these sightings were on what is now State land. Burrowing owls are present along the coast during the overwintering season, outside of summer. The Project will avoid potential impacts to this species because construction will occur during the summer months.
California clapper rail *(Rallus longirostris obsoletus)*	FE, SE	Coastal salt and brackish marshes and tidal sloughs.	No	**No Impact.** Occurs almost exclusively in tidal and brackish marshes with unrestricted daily tidal flows, adequate invertebrate prey food supply, well-developed tidal channel networks, and suitable nesting and escape cover to provide habitat during extreme high tides. Their current distribution is restricted to the San Francisco Bay Estuary.
Calfornia condor *(Gymnogyps californianus)*	FE, SE	Open grasslands, oak savanna foothills, and beaches adjacent to coastal mountains.	No	**No Impact.** Suitable nesting habitat is not found within the project site. California condors use vast expanses of varying habitats for foraging, roosting, and nesting. Condors roost on large trees or snags, or on rocky outcrops and cliffs. Nests are located in caves and ledges of steep rocky terrain or in cavities and broken tops of old growth conifers created by fire or
California least tern *(Sterna antillarum browni)*	FE, SE	Beaches, mudflats, and sand dunes, usually near shallow estuaries and lagoons with access to the near open ocean.	No	**No Impact.** Project design will avoid areas of suitable habitat.
Tufted puffin *(Fratercula cirrhata)*	Federally protected under the Migratory Bird Treaty Act	Coastal waters, nests on grassy steep slopes or cliff tops and in burrows on sea cliffs.	No	**No Impact.** Suitable nesting habitat not found within the Project site.
Yellow-billed cuckoo (*Coccyzus americanus)*	FT, ST	Wooded habitat with dense cover and water nearby, including woodlands with low, scrubby, vegetation, overgrown orchards, abandoned farmland and dense thickets along streams and marshes.	No	**No Impact.** Suitable habitat not found within the Project site.

FE – Federally Endangered
FT – Federally Threatened
FC – Federal Candidate
SE – State Endangered
ST – State Threatened
SSC – State Species of Special Concern
FP – State Federally Protected

CH – Critical Habitat

CDFW Special Animals List
G2S2 – Imperiled: At high risk of extinction due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.

REGULATORY SETTING

The following section includes the regulatory framework surrounding the biological resources as part of the Project and impact analysis. Information regarding the regulatory setting for biological resources was compiled by using federal and state laws and statutes on the protection of biological resources.

FEDERAL REGULATIONS

United States Army Corps of Engineers

The United States Army Corps of Engineers (ACOE) is responsible for administering several federal programs related to ensuring the quality and navigability of the nation's waters.

Although definitions vary to some degree, wetlands are generally considered to be areas that are periodically or permanently inundated by surface or ground water, and support vegetation adapted to life in saturated soil. Wetlands are recognized as important features on a regional and national level due to their high inherent value to fish and wildlife, use as storage areas for storm and flood waters, and water recharge, filtration, and purification functions. Technical standards for delineating wetlands have been developed by the U.S. Army Corps of Engineers and the California Coastal Act of 1976, each of which generally define wetlands through consideration of three criteria: hydrology, soils, and vegetation.

Federal Wetlands

The ACOE defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3). The ACOE's delineation procedures identify wetlands in the field based on indicators of three wetland parameters: hydrophytic vegetation, hydric soils, and wetland hydrology.

Clean Water Act Section 404

Congress enacted the CWA "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 404 of the Clean Water Act (CWA) authorizes the Secretary of the Army, acting through the ACOE, to issue permits regulating the discharge of dredged or fill materials into the "navigable waters at specified disposal sites." Section 502 of the CWA further defines "navigable waters" as "waters of the United States, including the territorial seas." "Waters of the United States" are broadly defined at 33 CFR Part 328.3 to include navigable waters, perennial and intermittent streams, lakes, rivers, ponds, as well as wetlands, marshes, and wet meadows.

Federal Endangered Species Act

The Endangered Species Act of 1973 (ESA) provides information regarding the continuous protection and management of special status species as well as their habitats. USFWS and the National Oceanic and Atmospheric Administration/National Marine Fisheries Service (NMFS) determine which species are listed for protection under this act and are the regulatory agencies that enforces the ESA.

Section 7

Section 7 of the ESA requires that federal agencies, with cooperation from the Secretary of the Interior or the Secretary of Commerce, ensure that any Project-related activities that might jeopardize the existence of any threatened or endangered species, or adversely harm or destroy any habitat that is critical to the livelihood of said species in any way, is not undertaken. Section 7 also requires a permit that must be obtained to allow for the take of any threatened or endangered species during lawful project activities. Procedures to apply for this permit can be found at 50 CFR Part 402 of the ESA. This section of the ESA is enforced by USFWS and NMFS.

Section 9

Section 9 lists all actions that are prohibited under the Endangered Species Act. This includes take of a species with intent to harass, harm, pursue, wound, kill, etc. Only two circumstances are listed under Section 9 in which take is allowed, both of which occur when the take is incidental to an otherwise legal activity. Section 7 details how a permit is required for such incidents, which is obtained through the USFWS and NMFS.

Section 10

Section 10 provides a means for a non-federal action that has potential to result in the take of a federally listed species could be allowed under an incidental take permit. Application procedures are found at 50 CFR Parts 13 and 17 for species under the jurisdiction of USFWS and 50 CFR Parts 217, 220, and 222 for species under the jurisdiction of NMFS.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior USFWS. The MBTA also covers any nest occupied during breeding season, making it illegal to disturb any such nest or take, kill, or pursue any egg or hatchling.

STATE REGULATIONS

California Environmental Quality Act

CEQA was designed to ensure that potentially significant environmental impacts are analyzed and mitigated to a less than significant level in order for a project to be approved and permits to be obtained. Appendix D of CEQA introduces a list of 6 questions directly related to Biological Resources to be analyzed in order to determine the significance of any potential impacts.

In addition to CEQA Appendix G, CEQA Guidelines § 15380(d) allows for a public agency to determine whether significant impacts may take place to species that are not listed as endangered or threatened but meet certain criteria that define special – status species. This allows public agencies to protect vulnerable species from a project's potentially severe impacts until USFWS, NMFS, or CDFW formally protects the species by listing them as threatened or endangered.

Regional Water Quality Control Board

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) have jurisdiction over "waters of the State," which are defined as any surface water or groundwater, including saline waters, within the boundaries of the state (California Water Code sec. 13050(e)). These agencies also have responsibilities for administering portions of the CWA.

Clean Water Act Section 401

Section 401 of the CWA requires an applicant requesting a federal license or permit for an activity that may result in any discharge into navigable waters (such as a Section 404 Permit) to provide state certification that the proposed activity will not violate state and federal water quality standards. In California, CWA Section 401 Water Quality Certification (Section 401 Certification) is issued by the RWQCBs and by the SWRCB for multi-region projects. The process begins when an applicant submits an application to the RWQCB and informs the ACOE (or the applicable agency from which a license or permit was requested) that an application has been submitted. The ACOE will then determine a "reasonable period of time" for the RWQCB to act on the application; this is typically 60 days for routine projects and longer for complex projects but may not exceed one year. When the period has elapsed, if the RWQCB has not either issued or denied the application for Section 401 Certification, the ACOE may determine that Certification has been waived and issue the requested permit. If a Section 401 Certification is issued it may include binding conditions, imposed either through the Certification itself or through the requested federal license or permit.

The SWRCB's *Implementation Guidance for the Wetland Definition and Procedures for Discharges of Dredge and Fill Material to Waters of the State* (2020), states that waters of the U.S. and waters of the State should be delineated using the standard ACOE delineation procedures, taking into consideration that the methods shall be modified only to allow for the fact that a lack of vegetation does not preclude an area from meeting the definition of a wetland.

Wetland Waters of the State

Procedures for defining wetland waters of the State pursuant to the SWRCB's *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* went into effect May 28, 2020. The SWRCB defines an area as wetland if, under normal circumstances:

> (i) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both;
>
> (ii) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and
>
> (iii) the area's vegetation is dominated by hydrophytes, or the area lacks vegetation.

California Coastal Act

The Coastal Act guides how the land along the coast of California is developed or protected from development. It emphasizes the importance of public access to the coast, and the preservation of sensitive coastal and marine habitat and biodiversity.

The Coastal Act defines the area of the coast that comes under the jurisdiction of the CCC, which is referred to as the "coastal zone." The Coastal Zone extends seaward to the state's outer limit of jurisdiction (three miles), including offshore islands. The inland boundary varies according to land uses and habitat values. In general, it extends inland 1,000 yards from the mean high tide line of the sea, but is wider in areas with significant estuarine, habitat, and recreational values, and narrower in developed urban areas. Coastal Zone boundary maps are available on the Coastal Commission website. The Project Sites fall within the portion of the Coastal Zone that is managed by the San Luis Obispo County Planning and Building Department via a Local Coastal Program. The Project Sites fall within the County's North Coast Planning Area.

Coastal Wetlands

§ 30107.5 of the Coastal Act defines Environmentally Sensitive Habitat Areas (ESHA) as areas in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem, and which could be easily disturbed, degraded, or enhanced by human activities and developments. The Coastal Act states that resource extraction, development, and sales or transfers should be limited or prohibited in ESHA in order to ensure that these areas remain intact (especially § s 30240, 30233, 30263, and 30609.5). These areas must be protected against habitat disruption, including land use and development that are adjacent to ESHA and may impact such areas.

Coastal Wetlands

Coastal Act § 30121 identifies wetlands, which often qualify as ESHA, as "lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens."

Under the Coastal Commission's definition of wetlands (see California Code of Regulations § 13577(b)), a wetland need only display one of the parameters typically used to define wetland areas, in contrast to the U.S. Army Corps of Engineers, which uses a three-parameter definition under its federal authorities. The diking, filling or dredging of wetlands is generally permitted for specific purposes listed in Coastal Act § 30233, regardless of whether the wetland also meets the definition of ESHA.

California Endangered Species Act

The California Endangered Species Act of 1984 (CESA) and other regulations implemented by the Fish and Game Code work to provide protection for rare, threatened, or endangered plants and animals recognized by the California Department of Fish and Wildlife (CDFW). The CESA prohibits the taking or any special-status species without permission, as well as prohibiting any actions that could severely impact the production of the species through habitat destruction. The CESA also orders that State agencies should not approve any Project that could potentially jeopardize the continued existence of a threatened or endangered species if alternatives exist that would avoid these risks all together. If a Project has the potential to affect both State and Federally listed species, compliance with the federal ESA will fulfil those required by the CESA if CDFW determines that the federal incidental take authorization is consistent with the CESA under California Fish and Game Code § 2080.1. If a Project will only impact species listed solely in California, the Project Applicant may apply for a take permit under § 2081(b).

California State Fish and Game Code

The California State Fish and Game Code contains 3 separate pieces which could pertain to the Project. Sections 1600 through 1616, 280 and 281, and 3503 and 3503.5 provide details on actions that are prohibited by the California State Fish and Game Code and will be enforced by CDFW. They are summarized below.

Sections 1600 through 1616

Under these sections of the California State Fish and Game Code, the Project Applicant is required to inform the CDFW of any Project actions that may divert, obstruct, or change the natural flow, bed, channel, or bank or any stream, river, or lake prior to the action occurring. This includes any watercourse with surface or subsurface flows that support or have previously supported riparian vegetation. The CDFW also has jurisdiction over dry washes that carry storm water ephemerally during storm events. When existing fish or

wildlife resources may be adversely affected by a Project action, the Project Applicant and CDFW must enter into a streambed alteration agreement to protect the resource.

Sections 2080 and 2081

Section 2080 of the California State Fish and Game Code states, "No person shall import into this state [California], export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the Commission [State Fish and Game Commission] determines to be an endangered species or threatened species, or attempt any of those acts, except as otherwise provided in this chapter, or the Native Plant Protection Act, or the California Desert Native Plants Act." Section 2081 states that the CDFW may allow individuals to take, import, export, or possess state special status species through permits or a Memorandum of Understanding (MOU). These can only be applied for if:

1. The take is incidental to an otherwise lawful activity.
2. Impacts of the authorized take are minimized and fully mitigated.
3. The permit is consistent with any regulations adopted pursuant to any recovery plan for the species.
4. The Project Proponent ensures adequate funding to implement the measures required by the CDFW.

It is not anticipated that an Incidental Take Permit from CDFW will be required as no take of State listed species is anticipated to occur.

Sections 3503 and 3503.5

These sections of the California State Fish and Game Code state that a Project Proponent may not conduct any activities that would result in the taking, possessing, or destroying of any birds of prey, taking or possessing of any migratory non-game bird as designated by the MBTA, the taking, possessing, or needlessly destroying of the nest or eggs of any raptors or non-game birds protected by the MBTA, or the taking of any non-game bird pursuant to California State fish and Game Code Section 3800.

California Native Plant Protection Act

The California Native Plant Protection Act (NPPA) requires all State agencies to carry out programs to conserve rare and endangered native plants. The NPPA prohibits the taking of listed plants from the wild and requires the notification of the CDFW at least 10 days in advance of any change in land use, allowing them to salvage any plant that may otherwise be destroyed. Botanical Inventories and consultation with the CDFW are required of the Project Applicant during the Project planning in order to comply with the provisions of this act and sections of CEQA that pertain to rare and endangered species.

THRESHOLDS OF SIGNIFICANCE

The CEQA Appendix G thresholds are significant for consideration in that they describe which state and federal agencies will be needed in the review of environmental impacts as well as what permits are required for Project implementation.

In the following section impacts to biological resources are addressed under these thresholds and avoidance and minimization measures specific impacts are designed in order to avoid or reduce impacts below levels of significance.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

For the environmental impact analysis of the Project, both direct and indirect impacts to biological resources from construction and operational activities are considered. These impacts include the potential for the Project to injure or cause mortality in wildlife species, the temporary and permanent loss of plant species and the loss of habitat that supports both wildlife and plant species. Figures BIO-1, BIO-2, BIO-3, and BIO-4 provide maps of the Project layout including the locations of project infrastructure in relation to present biological resources within the Project sites. These maps represent and reference where certain impacts would occur with the current Project plans.

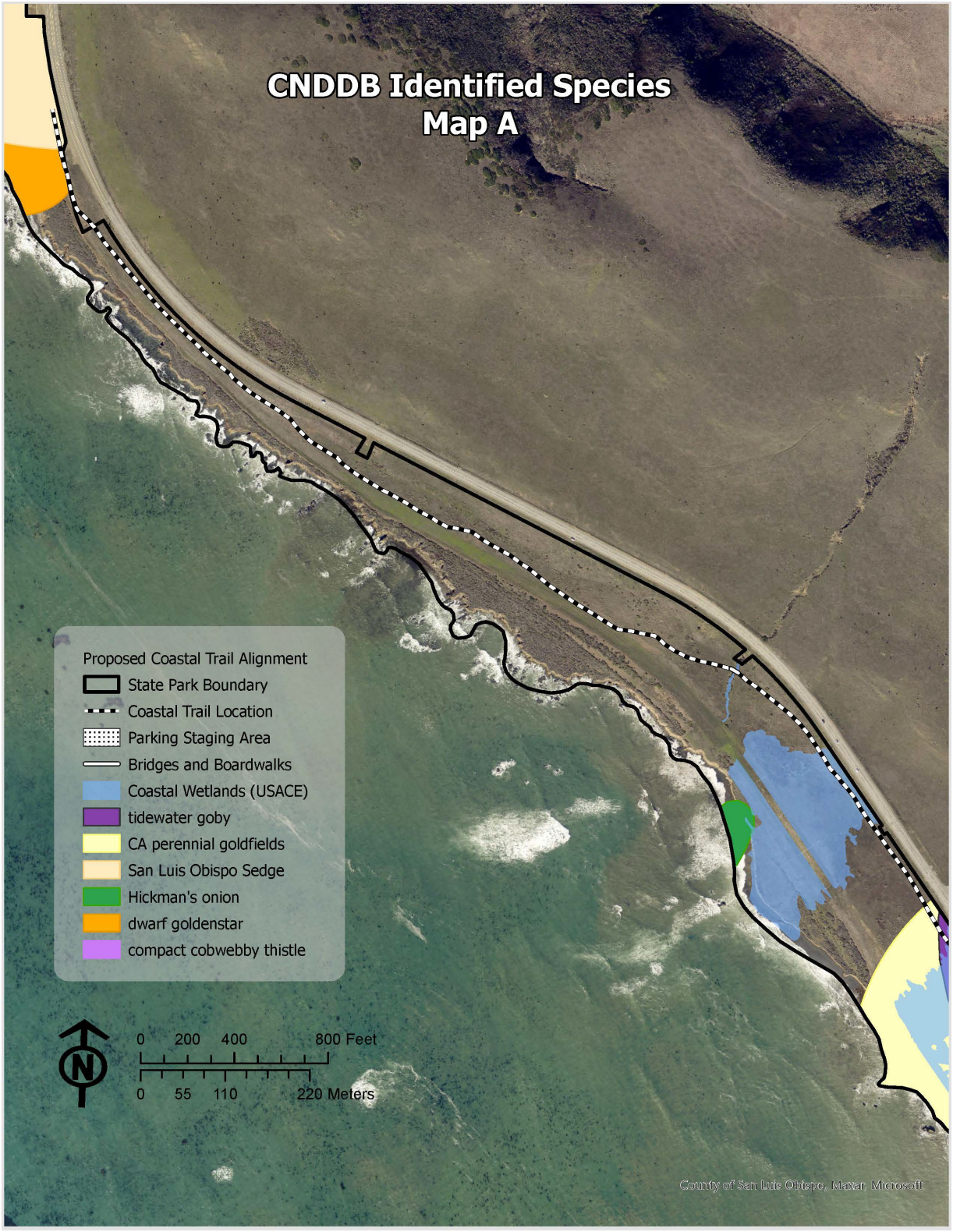

Figure BIO-1. Map of Species identified by CNDDB with potential to occur near project site (Section A).

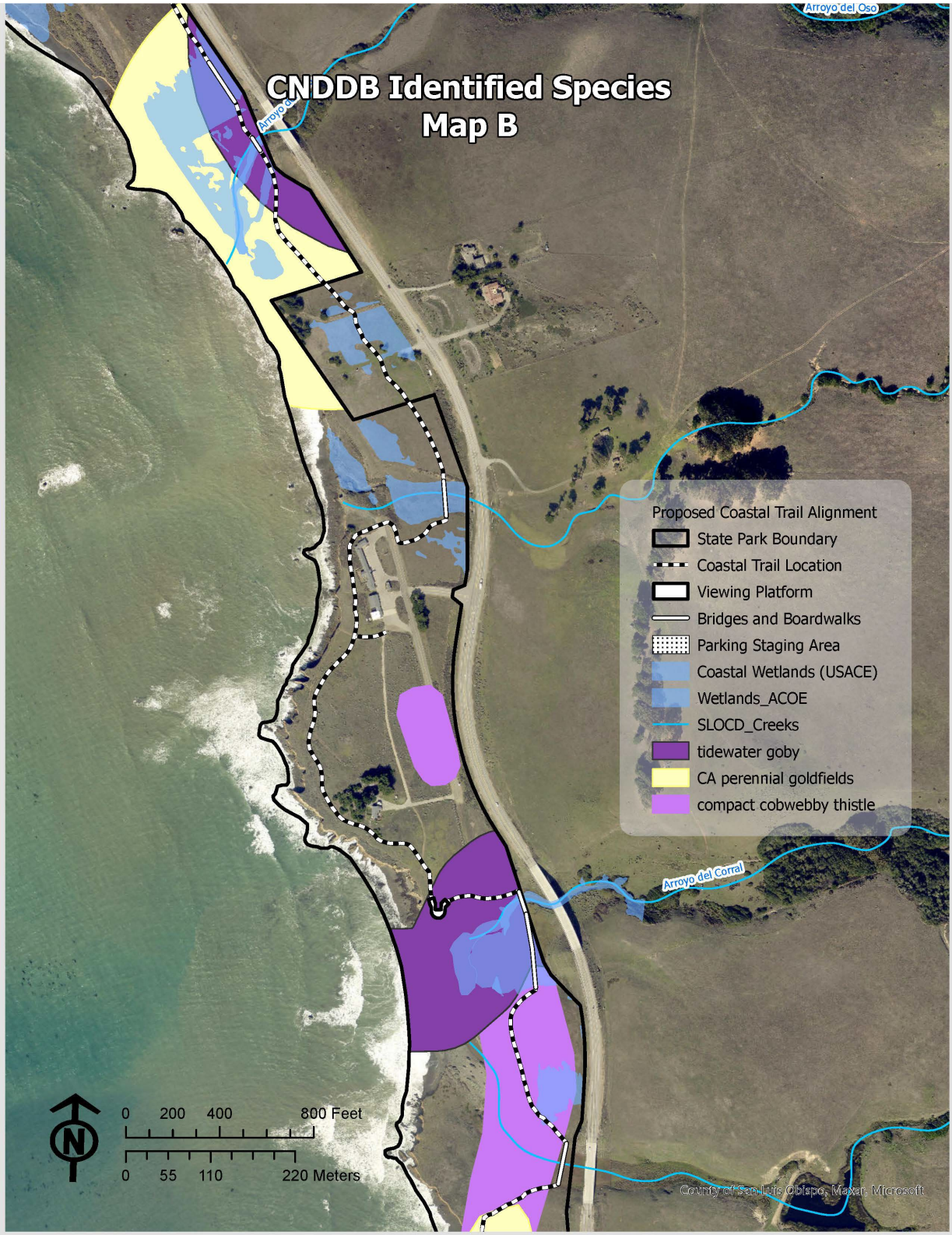

Figure BIO-2. Map of species identified by CNDDB with potential to occur near project site (Section B).

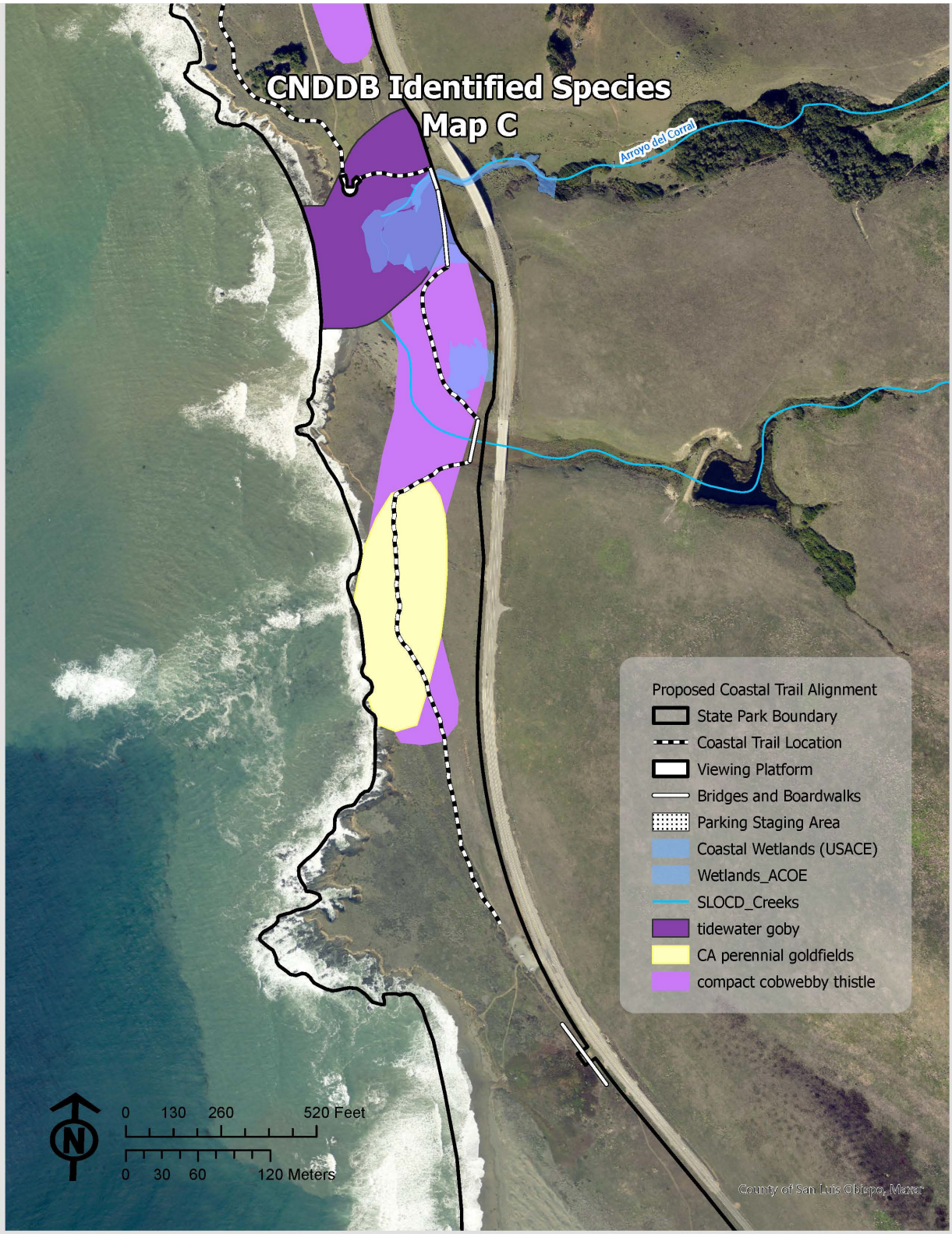

Figure BIO-3. Map of species identified by CNDDB with potential to occur near project site (Section C).

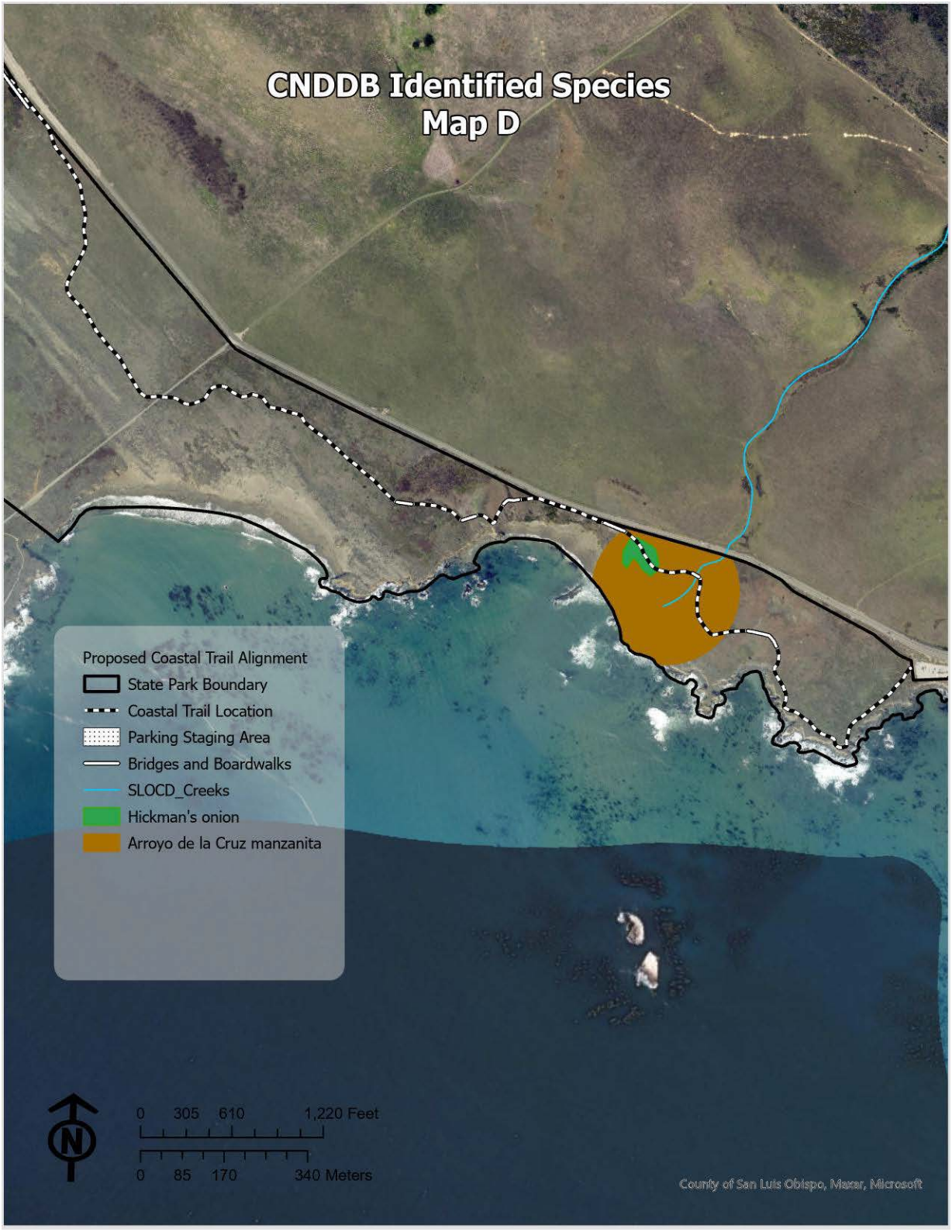

Figure BIO-4. Map of species identified by CNDDB with potential to occur near project site (Section D).

IMPACT ANALYSIS

The following impact analysis contains each specific impact and corresponding mitigation measure as they relate to the defined thresholds of significance for biological resources.

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LES S THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
c) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
d) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
e) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat	☐	☐	☐	☒

conservation plan?

DISCUSSION

a) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Tables BIO-1, and BIO-2 summarize potential impacts to listed plant and animal species. The PBCT has the potential to impact the following sensitive biological resources: wetlands, compact cobwebby thistle & northern elephant seals. The preferred location for PBCT was chosen to avoid sensitive habitat as much as feasible. The Project will include the removal of vegetation including the cobwebby thistle, elevated boardwalks constructed in and/or over wetlands, and increasing visitor use near beaches that are used as haulouts by northern elephant seals. The Project includes bridges that will span waterways that provide habitat for steelhead and tidewater gobies, and one bridge will span a waterway that is designated critical habitat for tidewater goby, Arroyo del Corral.

Wetlands

A wetland delineation will be conducted as a part of the regulatory permitting process to identify which portion(s) constitute federal, State, and/or coastal wetlands. Where the PBCT cannot avoid wetlands, elevated boardwalks will be installed to raise the trail above this feature, which will allow wetland flora and fauna to exist and migrate under the structures, though the piers supporting the boardwalks will be constructed within and result in permanent impacts to wetlands. Individual piers will be the portion of the boardwalk that will be constructed within the wetlands. The proposed use of raised boardwalks across wetlands would allow for migration of some wildlife below the structures, continued growth of vegetation, and allow hydric function to continue.

The impacts to wetlands associated with the cumulative area of the boardwalk piers will be mitigated on-site and/or off-site at a ratio agreed upon with regulatory permitting agencies to reduce impacts to this protected resource to a less than significant level.

Coastal Prairie

The PBCT will impact approximately 0.92 acres of coastal prairie. DPR Environmental staff will gather coastal prairie stock and/or seed from the Project site prior to construction and store it in their greenhouses, and later use it to mitigate the loss of coastal prairie at a mitigation ratio agreed upon by regulatory permitting agencies.. Whether or not the mitigation will occur onsite and/or offsite will be determined once the precise construction footprint is finalized and as a part of the regulatory permit process. All mitigation will occur on State Parks property.

Cobwebby thistle

For individuals of this species that are impacted by the PBCT, DPR Environmental staff will gather stock and/or seed from the Project site prior to construction and store it in their greenhouses, and later use it to mitigate the loss of cobwebby thistles at a ratio agreed upon with the regulatory permitting agencies. Like the mitigation effort described for wetlands and Coastal Prairie above, specific locations and criteria regarding where mitigation plantings will occur will be identified once the construction footprint is identified and mitigation is finalized during the regulatory permitting process.

For wetland, coastal prairie, and cobwebby thistle mitigation, mitigation will occur onsite and offsite, if needed, as part of the Conceptual Mitigation Monitoring & Reporting Plan (Appendix G). The Conceptual Mitigation Monitoring & Reporting Plan outlines where mitigation may occur, defines success criteria, outlines maintenance actions, and identifies contingency measures and/or adaptive management actions if initial planting efforts do not meet success criteria. Both wetlands and coastal prairie are considered ESHA and will be mitigated appropriately and in coordination with permitting regulatory agencies.

Steelhead, tidewater goby, and tidewater goby critical habitat

Steelhead and tidewater gobies have been found in coastal waterways within the Project site and Arroyo del Corral is designated critical habitat for tidewater goby. Impacts are not anticipated to occur to these species or their habitat since the Project is designed to free-span these waterways using bridges. The bridges will not require dewatering of creeks/waterways; therefore, bridge construction is not anticipated to impact steelhead, tidewater gobies, and/or tidewater goby critical habitat.

California red-legged frog

California red-legged frogs have been observed at three locations within the Project site: the unnamed creek south of the lighthouse, Arroyo del Corral, and Arroyo del Oso. However, construction activities at these locations involve installing free-span bridges which will avoid impacts to the waterways. To avoid impacts to this species during construction, construction will be timed to occur outside of the breeding season when this species is less likely to be dispersing overland, and a qualified biological monitor will survey for this species prior to work in these areas. If one is detected during surveys, work will halt at that location until the individual moves out of the Project area on its own.

Northern elephant seal

Fencing to preserve elephant seal haul out areas has been installed by Caltrans at Arroyo del Corral to protect current areas used as haul outs and to accommodate anticipated elephant seal expansion in coming years. Fencing has been installed by DPR at other locations where visitor usage occurs near or within elephant seal habitat. The Project

design includes elephant seal fencing that will be installed at Arroyo Del Oso, where it currently does not exist, and around a viewing platform that will be built at Arroyo del Corral (See Figure BIO-5) to prevent elephant seal and human interaction and allow trail users to view elephant seals from a safe distance. Fencing installation at Arroyo del Oso is not anticipated to cause impacts to elephant seal movement or habitat and is intended to preserve haul out areas, while keeping trail users and elephant seals separated and allowing trail users to view elephant seals from a safe distance.

In approximately 2011, DPR constructed an elephant seal viewing platform next to the Caltrans parking lot in Piedras Blancas, south of the light station, referred to as "Vista Point 4 or VP4." This viewing platform with fencing has accommodated visitors for approximately 13 years. DPR's Interpretive Program manages volunteer groups and programs for State Parks and ensures that Parks' messaging is communicated to visitors. Interpreters are the frontline communicators to educate the public about natural resources, how Parks protects those resources, and the importance of respecting natural resources like wildlife. The Interpretive Program reports issues to DPR's Law Enforcement (e.g., rangers) if public safety issues arise. The Interpretive Program ensures the protection of natural resources. The messaging has proven to be effective in minimizing human-wildlife interactions while allowing visitors to view and learn about the natural history of the northern elephant seal from a safe distance. Currently at VP4, the Interpretive team along with their volunteers communicates these messages to approximately 12,000 visitors a month. This successful program will be extended to the new elephant seal platform.

Based on the effectiveness of the existing viewing platforms and fencing, in combination with DPR's Interpretive Program, it is anticipated that the proposed fencing and platforms for the PBCT will also be successful in protecting elephant seals by keeping visitors on trail and at a safe distance for viewing. In addition, existing fencing will be repaired and maintained as a component of this project.

Burrowing Owl

Burrowing owls are known to overwinter in the Project area, utilizing burrows as roosts. Observations have been sparse and scattered. Observations along the exiting dirt trail (between the northern elephant seal parking area and the North Lighthouse beach) have not documented any burrows within the trail corridor between the years 2018-2024. Impacts to this species will be avoided by constructing the project outside of the overwintering season, during the summer months.

The Project will not have a substantial adverse effect, either directly or indirectly through habitat modifications, on any sensitive, protected, or listed species. Impacts to sensitive, protected, and/or listed species will be mitigated to a less than significant level by the implementation of Standard Project Requirements BIOR-1 and BIOR-2 as well as the implementation of mitigation measures BIOMM-1, BIOMM-2, and BIOMM-3.

Conclusion: Less than significant impact with mitigation.

b) Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) either individually or in combination with the known or probable impacts of other activities through direct removal, filling, hydrological interruption, or other means?

Construction of the PBCT would include segments built over wetlands. To avoid significant impacts, these portions of the trail will be constructed using elevated boardwalks. Permanent impacts will be limited to the pier blocks that will be placed below the surface to support the new boardwalk. The boardwalks would add up to approximately 2,238 feet in length for the 9 boardwalks. Boardwalks will measure four (4) in width, resulting in a footprint of approximately 8,000 square feet within the wetlands. The boardwalks are designed to be elevated to allow hydric vegetation to continue to function in its current environment and receive exposure to sunlight, while avoiding the restriction of wildlife movement. The PBCT would not have a substantial adverse effect on any sensitive or riparian natural communities. Impacts to emergent wetlands cannot be avoided; however, the proposal to mitigate them at a on-site and/or off-site at a ratio agreed upon with regulatory permitting agencies will reduce the impacts to wetlands to a less than significant level. Additional avoidance, minimization, and/or mitigation measures may be added through the regulatory permitting process when the project moves through the process for authorization from ACOE, RWQCB, and the CCC.

Conclusion: Less than significant impact with mitigation.

c) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Based on routine surveys conducted by DPR and Caltrans, as well as the proposed project designs, construction of the PBCT Project will not interfere with the movement of any animals or impede the use of any nursery sites for native wildlife. Northern elephant seal haulouts are near the PBCT but the PBCT includes design elements to prevent visitors from impacting the elephant seals (i.e., fencing and viewing platform).

Conclusion: Less than significant impact.

d) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Project has been designed to be consistent with the CZLUO and North Coast Areas Plan. The Project is consistent with local policies or ordinances protecting biological resources.

Conclusion: No impact.

e) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The Project does not fall within an adopted Habitat conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Conclusion: No impact.

STANDARD PROJECT REQUIREMENTS

BIOR-1: Environmentally Sensitive Areas

- Environmentally Sensitive Areas will be demarcated, and all work personnel and vehicles/equipment will avoid those areas.

BIOR-2: Environmental Awareness Training

- Environmental training will be provided by a DPR Environmental Scientist for all work personnel prior to the onset of work activities, including staging and stockpiling.

BIOR-3: Best Management Practices

a) Prior to the start of on-site construction 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.

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.

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.

MITIGATION MEASURES

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.

BIOMM-2

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

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.

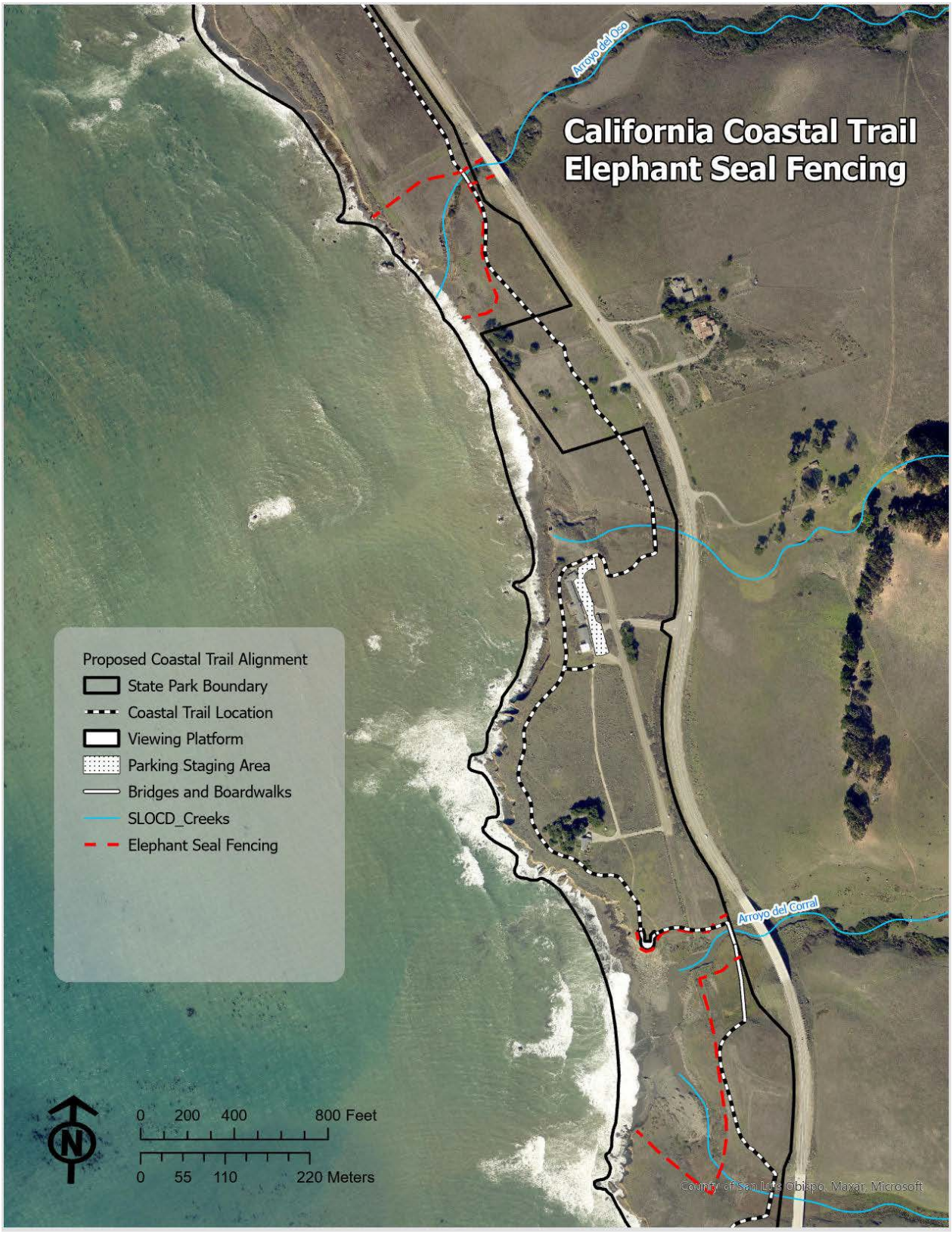

Figure BIO-5. Map of elephant seal fencing locations.

V. CULTURAL RESOURCES

This section provides a summary of the Native American and historic-era human history of the project area and region and a description of cultural resources known to exist in the project areas or which have the potential to exist. A cultural resource is a resource that exists because of human activity and includes prehistoric-era sites and artifacts as well as historic-era (post-European contact) sites, buildings, structures, objects, and districts. In order to address the potential for cultural resources to be present within the project area and to provide the environmental impact analysis for cultural resources, the regulatory setting of cultural resources is discussed below. Background information, cultural resources surveys, and studies conducted for the project are also discussed. This analysis of cultural resources is designed to identify and assess the potential impacts associated with both project construction and project operation. Thresholds of significance are used to determine the significance of environmental impacts for each issue area. They are based on the Initial Study Checklist included in Appendix G of the California Environmental Quality Act (CEQA) Guidelines and modified as needed to address potential project impacts.

CULTURAL REGULATORY SETTING

The following section includes the regulatory framework surrounding cultural resources as part of the Project and impact analysis. This Project is subject to both state and federal environmental regulations: CEQA and NEPA. As required per this IS/MND, DPR must comply with all CEQA regulations pertaining to cultural resources. In addition, due to federal funding and federal permitting the Project constitutes a federal undertaking. The following section of this IS/MND will address the project's potential for environmental impacts to cultural resources under CEQA.

FEDERAL REGULATIONS

Specific project elements necessitate work to be conducted within wetlands, jurisdictional waters of the United States Army Corps of Engineers (ACOE) requiring the DPR to obtain an ACOE-issued 404 Permit for work within those jurisdictional waters. This constitutes a federal nexus initiating compliance with federal regulations and the appointment of ACOE as the federal lead agency.

National Historic Preservation Act (NHPA)

Federal undertakings are subject to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800). Pursuant to Section 106 of NHPA, DPR will prepare a comprehensive Section 106 Compliance Report which will be submitted to the ACOE as part of the 404 Permit application process and will serve to satisfy DPRs role in NEPA compliance. This report will be completed separately from this IS/MND and will be on file with the Office of the State Historic Preservation Officer (SHPO) and DPR.

National Environmental Policy Act (NEPA)

NEPA requires federal agencies to consider the effects of their actions on all aspects of the "human environment". Regulations implementing NEPA are in Title 40 of the Code of Federal Regulations 1500-1508.

STATE REGULATIONS

California Environmental Quality Act (CEQA)

CEQA includes laws that protect cultural resources such as historic resources, Native American sites and archaeological deposits and requires state agencies to consider their actions which may impact these resources. Regulations address how to determine if a cultural resource is significant by subjecting resources to archaeological and/or architectural analysis via parameters, modeled after NHPA.

Historic Resources

Under CEQA, public agencies must consider the effects of their actions on both "historical resources" and "unique archaeological resources." In considering whether the actions of a lead agency have the potential for substantial adverse change on historic resources or unique archaeological resources as defined by State CEQA Guidelines Section 15064.5 lead agencies are required to address cultural resources in the environmental review process such as an Initial Study or Environmental Impact Report. Pursuant to Public Resources Code (PRC) Section 21084.1 and State CEQA Guidelines California Code of Regulations (CCR) Section 15064.5 (b), a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."

Potential historical resources must be evaluated for CRHR eligibility, or; already be listed in or formally determined eligible for listing in the NRHP, or included in California State Landmarks and Points of Historical Interest. The process for evaluating cultural resources for their potential to be considered eligible for listing in the CRHR follows that of the National Register of Historic Places (NRHP). Following CEQA Guidelines Section 15064.5 (a) and Section 21084.5 (a) and (b) a "historical resource" is defined as:

1. A resource listed in or determined to be eligible by the California State Historic Resources Commission, for listing in the Register of Historic Resources (PRC 5024.1).

2. A resource included in a local register of historical resources, as defined in section 5020(k) of the PRC or identified as significant in an historical resource survey meeting the requirements Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript that a lead agency determined to be historically or archeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political or cultural annals of California may be considered to be an historic resource, provided the lead agency's determination is supported by substantial evidence. Generally, a resource shall be considered "historically significant" if the resource meets the criteria for listing in the CRHR including the following:

   (A) Is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California and the United States.

   (B) Is associated with the lives of persons important to local, California or national history.

   (C) Embodies the distinctive characteristic of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values.

   (D) Has yielded, or has the potential to yield information, important in prehistory or history.

Unique Archaeological Resources

Section 15064.5 (c) and PRC Section 21083.2, subdivision (g), states that "'unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or

- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If it is found that a project will have a significant effect on a "unique archaeological resource" PRC Section 21083.2 addresses treatment and mitigation is required to bring the level of effect to below a significant level and can be incorporated into a Mitigated Negative Declaration (MND). Treatment options under Section 21083.2 include activities that preserve such resources in place in an undisturbed state. Other acceptable methods of mitigation under Section 21083.2 include excavation and curation or study in place without excavation and curation. If an archaeological resource is neither a historic

resource nor a unique archaeological resource, the effects of the project on those resources shall not be considered significant effect on the environment.

Inadvertent Discovery of Native American Human Remains

Section 7050.5(b) of the California Health and Safety code specifies protocol when human remains are discovered. The code states:

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code.

State CEQA Guidelines Section 15064.5, subdivision (e), requires that excavation activities be stopped whenever human remains are uncovered, and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native American origin, the Native American Heritage Commission must be contacted within 24 hours. The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American. At that time, the lead agency must consult with the appointed most likely descendent, who has 24 hours to make recommendations for the treatment and/or disposing of the human remains and any associated grave goods pursuant to PRC Section 5097.98. Section 15064.5 directs the lead agency (or applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains.

In addition to the mitigation provisions pertaining to accidental discovery of human remains, the CEQA Guidelines also require that a lead agency make provisions for the accidental discovery of historical or archaeological resources, generally. Pursuant to Section 15064.5, subdivision (f), these provisions should include:

…an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on with other parts of the building site while historical or unique archaeological resource mitigation takes place.

CULTURAL SETTING

The following section is a brief overview of the precontact Native American and Historic-era contexts of northern San Luis Obispo County and the overall region. The project area is located along the northern San Luis Obispo County coast centered on Point Piedras Blancas in the San Simeon area. This portion of the California coast is somewhat isolated from other areas of the state by the mountainous terrain surrounding it on all sides and the rugged and exposed coastline of the Pacific Ocean to the north and south. This area hosts millennia of Native American history, which prior to the arrival of Europeans and the subsequent rapid and permanent impacts on Indigenous peoples from European, Mexican and American colonialism is referred to herein as prehistory, whereas the written documentation human life following European arrival is referred to as the Historic era.

Prehistory of Piedras Blancas

The Piedras Blancas area has hosted many millennia of prehistoric cultural development as indicated by the diverse cultures of Native American groups who have persevered to today and their oral histories and material culture, and through ethnographic documentation and archaeological investigations. The northern exposed coast of San Luis Obispo County, of which Piedras Blancas lies within, extending from the northern edge of Morro Bay to the southern extreme of the more rugged Big Sur coast at San Carpoforo Creek, can be regarded in archaeological terms as a relatively discrete environmental and cultural subunit (Jones and Waugh 1995). This region was somewhat isolated from regular interaction with neighboring groups but cultural similarities to surrounding Central California groups is still evident in material cultural and mythology. Trade networks are evident from along the coast and the Coast Ranges as far as the Sierra Nevadas, Cascades, and Mojave. Anthropological work and Native American tribal documentation has shown that within the Piedras Blancas cultural interaction sphere were both Salinan-speaking people and Northern Chumash-speaking people who shared a similar material culture (Baldwin 1971; Mason 1912). As recorded by missionaries, this region was inhabited by people who spoke a variant dialect from those of the interior Salinans and Northern Chumash, one referred to as *playano (*Heizer 1918).

Ethnographic documentation of the Piedras Blancas area began with Spanish voyages by sea, and later through missionaries at Mission San Antonio de Padua, San Luis Obispo de Tolosa, and later Mission San Miguel de Arcangel. Subsequent academic and scientific-oriented ethnographic work began in the late nineteenth century and continued through the mid-twentieth century when archaeological research took the primary role in understanding the prehistory of the area. The history of archaeological research along the California Central Coast spans much of the mid-twentieth century to the present, with increasing focus on identifying and studying archaeological sites since the onset of cultural research management (CRM) following NEPA and CEQA in 1970. Significant archaeological investigations of the Piedras Blancas area have occurred primarily through Caltrans projects on Highway 1 and additional investigations taking place through CRM work for modern development. The most significant archaeological investigations to have

taken place in close vicinity to Piedras Blancas and the PBCT alignment are those at CA-SLO-179 and CA-SLO-267 (Jones and Ferneau 2001), investigations at CA-SLO-264, -267, and -1226 (Bouey and Basgall 1991), a study at the Piedras Blancas Light Station (Arrington et al 2007) and those by Caltrans archaeologists and their consultant Far Western during testing and evaluations for NRHP eligibility (Rosenthal et al. 2001) for the Highway 1 realignment which ultimately led to the current Project).(see previous studies section below).

Archaeological evidence indicates that San Luis Obispo County was occupied as early as 10,000 years ago, as indicated by radiocarbon dates obtained from archaeological excavations at Diablo Canyon (Greenwood 1972) and Cross Creek (Jones et al. 1997; Fitzgerald and Jones 1999). Continuous prehistoric occupation and sporadic cultural developments along the Central Coast have resulted in an elaborate archaeological record. Archaeological research in the region has resulted in a generally accepted framework for defining prehistoric periods which are summarized as the following:

Paleoindian Period	~ 13,000 – 10300 years before present (B.P.)
Millingstone Period	10300 – 5700 B.P.
Early Period	5700 – 2600 B.P.
Middle Period	2600 – 1000 B.P.
Middle/Late Transition	1000 – 700 B.P.
Late Period	700 B.P. – historic contact (1542-1769 C.E.)

Paleoindian Period (at least 13,000 – 10,300 BP)

The Paleoindian Period refers to the earliest known occupation of the Central Coast, which is very obscure to both the mere antiquity and to the change in sea levels resulting from the transition out of the Last Glacial Maximum and punctuated sea level rise to near modern levels during this period. Evidence of the earliest human presence in San Luis Obispo has been documented at CA-SLO-1797 (Jones et al. 1997: Fitzgerald and Jones 1999) and nearby at CA-SLO-1764 with radiocarbon dates yielding 9,900 B.P. and 10,500 B.P. respectively. Other notable dates relating to this period are from the Diablo Canyon excavation (Greenwood 1972) and further south along the Channel Islands at the infamous Daisy Cave and Arlington Springs sites where human remains dated to 10,000 B.P. and 13,000 B.P. respectively.

Archaeological sites buffered from the effects of sea level rise, or those with intact deposits remaining along the coast have been identified throughout San Luis Obispo County and the Central Coast as a whole and should be considered highly sensitive resources. Archaeological evidence relating to this period is rare but further archaeological investigation of deposits relating to this period is bound to shed more light on this period of prehistory.

Millingstone Period (10,300 – 5,700 BP)

The earliest well studied period along the Central Coast and within San Luis Obispo County is the Millingstone Period, also referred to as the Archaic Period in other regions.

Artifact assemblages from this period are characterized by an abundance of milling stone tools supporting a diet rich in seeds and other plant materials requiring processing or milling. Manos, or hand-sized pounding and grinding implements, flat slabs and concave metates are common but mortars and pestles are absent until later development. Flaked stone technology is represented by infrequent large side-notched projectile points and spire-removed and thick rectangular *Olivella* shell beads with faunal assemblages composed of marine shellfish and large to medium sized terrestrial mammals. The Millingstone Culture was originally defined in southern California by Wallace but has now been recognized as a widespread cultural "horizon" present in much of Central and Northern California (Fitzgerald and Jones 1999). On the central coast, Millingstone Culture assemblages were first recognized at Diablo Canyon (Greenwood 1972) but are now seen throughout the region (Fitzgerald and Jones 1999: Fig 1). Overall, evidence indicates that the Millingstone Cultural was a generalized cultural adaptation focused on broad spectrum foraging by seasonally mobile hunter-gatherers. Due to the continued rise in sea level at this time, many sites associated with the period along the coast have been lost from erosion.

Early Period (5,700 – 2,600 BP)

The Early Period along the Central Coast is well documented, and many sites contain Early Period deposits underlying more recent deposits. This period is defined most readily by the introduction of the mortar and pestle and a dietary shift to acorns as a primary source of food. Sites in San Luis Obispo with Early Period components are commonly abundant with abalone, mussel, and other rocky intertidal marine shellfish species. Excavations along Morro Bay and Pismo Beach have shown moonsnails, oysters and other estuarine species to be in abundance prior to their disappearance from the archaeological record during the Early Period as a result of changes in estuary environments. This period in the Piedras Blancas area is well represented by archaeological investigations at SLO-175 (Jones and Ferneau 2001) where a localized cultural chronology was established placing Early Period deposits into the Little Pico I phase. Other representations of the Early Period have occurred during investigation at CA-SLO-165 (Jones and Waugh 1995) and at CA-SLO-2 (Greenwood 1972).

Middle Period (2,600 – 1000 BP)

The Middle Period on the Central Coast is a well-documented period in terms of archaeological investigations. It is defined locally based on the excavations at CA-SLO-215 (Jones and Waugh 1995). Components from this period have been investigated thoroughly at several locations and excavations such as those previously mentioned at CA-SLO-267 revealed deep single component deposits with an abundance of data about this period on the Central Coast. Part of the apparent abundance of data from the Middle Period may be due to these stratigraphic deposits being less impacted by early agricultural activities such as plowing and surface grading of sites than overlying cultural more recent cultural layers closer to the surface which were destroyed.

In general artifact assemblages associated with the Middle Period demonstrate continuity from the Early Period (Jones and Waugh 1995). However, the Middle Period is marked in the archaeological record by the dominance of the Central Coast Stemmed series projectile points along the Central Coast and the introduction of certain Olivella bead types and the first appearance of shell fishhooks. The mortar and pestle continue to be present in abundance Middle Period deposits as a time when populations were increasing, and cultural development was somewhat stable.

Middle/Late Transition Period (1000 – 700 BP)

This transitional period in the chronology of Central Coast prehistory coincides with significant environmental changes which occurred globally during this time: climatic changes associated with a rise in global temperatures and mean sea temperature rise, known specifically as the Medieval Climatic Anomaly. Climatic changes affecting biological production in the terrestrial environment and prolonged droughts impacted native populations. This period brought about substantial cultural change and emerging social complexity within the Santa Barbara Channel area and beyond. Chumash-speaking people transitioned during this time to a sedentary chiefdom society where a monetary system based on *Olivella* bead production supported specialized trades and the abandonment of egalitarianism altogether (Erlandson and Jones 2002). This period is marked by increased violence as shown through archaeological evidence, as well as a more intensive reliance on the marine environment.

The Mid/Late Transition also witnessed the adoption of the bow and arrow. Whether or not this is a result of a migration of cultures into California from Mexico and the Southwest, or through diffusion of technology as result of trade and cultural contact is still debated. In general, the Middle/Late Transition Period marks a prominent change in cultural complexity on the Central Coast and beyond leading to further developments of the Late Period and the cultures encountered by the first Europeans in California.

Late Period (700 BP – Historic Contact/1542-1769 Common Era [CE])

Whenever it occurs, the transition to Late Period cultures is marked by the introduction of the bow and arrow, indicated by small side-notched (Desert Side-notched [DSN]), and triangular (Cottonwood) projectile points. Additionally major shifts in settlement and social organization are reflected in the material record. Class E and K *Olivella* shell beads replace Class G beads, bead drills and manufacturing debris, are relatively common at Later Period sites indicating a dispersed household bead production industry. Small village sites are common inland with a focus on bedrock and hopper mortars indicating intensification in the exploitation of plant resources, particularly acorn. Additionally, faunal assemblages are dominated by cottontail rabbits, indicating a shift to lower ranked prey species.

The changes noted between Late Period and Middle Period archaeological assemblages seems to reflect a truly revolutionary shift in social organization, with numerous relatively

small homogenous sites, indicating the small territories that would require the resource intensification noted in the floral and faunal assemblages. This has led some archaeologists to posit that the triblet societies recorded during the ethnographic period (Kroeber 1925) date back to around 800 BP (Jones et al. 2007:143). This is supported by numerous ethnographic and mission period village sites that were initially occupied around 800 BP (Jones et al. 2007: Figure 9.6).

NATIVE AMERICAN AND ETHNOHISTORIC SETTING

The northern San Luis Obispo coast was home to Native American groups for over ten millennia, as described in the previous sub section. The northern exposed coast of San Luis Obispo County, extending from the northern edge of Morro Bay to the southern extreme of the more rugged Big Sur coast at San Carpoforo Creek, can be regarded as a relatively discrete environmental and cultural subunit (Jones and Waugh 1995). The cultural affiliation and language of the earliest settlements and subsequent millennia are unknown, but modern-day descendant communities and researchers have looked for evidence of cultural continuity from the remote past to those Native American groups who were present at the time of European contact and whose descendants are still present today. Missionaries and later ethnographic work identified the region as a transition zone between two specific linguistic families where a coastal dialect was spoken: Northern Chumash and Salinan. These two cultures are both subgroups of larger tribal identities grouped by common languages and customs. Northern Chumash spoke the Obispeño Chumash language, related to the other Chumash languages of the Santa Barbara Channel and Channel Islands region, although Northern was found to be the most divergent of all the Chumash dialects. The Salinan language has been ascribed to the Hokan language stock although subsequent linguistic research has found it to be unrelated to any larger language family.

Similarities amongst the Salinan and Northern Chumash languages have been documented by both ethnographic and later linguistic research and allude to regular interaction between the two tribes (Baldwin 1971). Where the territories ascribed to the two tribes overlap has been obscure throughout historic times, and both archaeological and ethnographic evidence fails to conform to a discrete cultural boundary. Kroeber (Kroeber 1925) identified the center of Estero Bay as a likely cultural boundary, and based mainly on archaeological data, Gibson (Gibson 1990) attempted to place it further to the north at Cambria, even suggesting as far north as San Carpaforo Creek. Other research based on a thorough review of these attempts to define a concrete boundary between the two linguistic groups, state it is: “impossible to ascertain the time-depth such historical boundaries might have, and it is likely the Salinan-Chumash interphase was quite dynamic, particularly given the more marginal environmental characteristics found along this stretch of coast. (Bouey and Basgall 1991).” Bouey and Basgall also look at available evidence to suggest Salinan and Northern Chumash possessed many adaptive similarities, distinct from the cultures to the south. Jones and Waugh state a possible scenario where the boundaries “fluctuated through time in response to possible shifts in economic strategies and population movement” (Jones and Waugh 1995).

Mission records show both Northern Chumash and Salinans at Mission San Luis Obispo and at Mission San Miguel Arcàngel, some who came from locations along the Estero Point, Cambria, San Simeon and Piedras Blancas areas (Elglehardt 1933; Millikan and Johnson 2005). Records at Mission San Antonio de Padua record people brought from these areas who quickly assimilated into the Salinan speaking groups there, although some spoke a variant native tongue from the coast recorded as *de la playa,* or *playano*. It is also important to note the names "Chumash" and "Salinan" were terms imposed by European Americans during the 19th century to refer to the local indigenous peoples taken into the mission system, not derive these terms directly from the people themselves. In some aspects, the Northern Chumash have been shown to share more similarities to their northern neighbors, the Salinan in material culture and lifeways than to the southern Chumash groups (Glassow and Wilcoxen 1988). These factors lead many researchers to conclude that the San Simeon area was occupied by groups who may have spoken languages related to both Northern Chumash and Salinan and the greater coastal area between Morro Bay and San Simeon may have been a shared area or one where cultural boundaries were diffuse throughout millennia.

Salinan

The Salinans are a group of indigenous Californian people who occupied a large stretch of Central California and who are survived today by hundreds of descendants. The term Salinan was coined by early Spanish referring to the people who lived along the headwaters and central portions ofthe Salinas River which begins in the Coast Ranges of San Luis Obispo and empties into Monterey Bay. The Salinan cultural region extended over a wide territory all through the coastal ranges to the west and east of the central and southern Salinas Valley.

A.L. Kroeber conducted the largest ethnographic work in Central California and published the Handbook for California Indians (1925). In it, he described the Salinan tribe as occupying a large territory stretching from the coast to the crest of the Santa Lucia Mountains from San Luis Obispo in the south to Soledad in the north. There are three main dialects of the Salinan language, recorded at the missions and referred to by today's Salinan people, generally used to mark the cultural divisions between the three major subgroups: the Antoniaño, derived from the Mission San Antonio de Padua spoken in the northern extent of Salinan territory; Migueleño, derived from the Mission San Miguel Arcàngel, spoken in the southern portion of Salinan territory; and the dialect spoken along the coast referred to in mission records and later anthropologists as *playano* or *de le playa* Customs did not differ significantly between the major subgroups although some burial practices differed amongst Antoniaños and Migueleños and cultural elements of Northern Chumash to the south were more prevalent in Migueleño and playano than Antoniano (Kroeber 1925; Mason 1912).

Kroeber and Hester place the Salinan language under the Hokan family. Kroeber claims that the language is "wholly unconnected with the neighboring Yokuts and Costanoan (Kroeber 1925)," arguing that it has more in common with the Chumash and Esselen, a

smaller tribe located to the Salinan's northwest. Additional ethnographic research has shown similarities in language and material culture with the Northern Chumash to the south. The population of the Salinan at the time of contact has been estimated to have been upwards of 3,000. Mission San Antonio de Padua became the largest of the California Missions in 1790 with most of the neophytes Antoniaños, with a few Playanos (Heizer 1918).

The mission system and later Mexican and American colonialism eventually took its toll on all Salinan-speaking people, and slavery, disease and assimilation decimated much of the population. Traditional lifeways and culture, along with language and knowledge of cultural histories were largely impacted during the struggle. Perseverance by many Salinan people retained much of the culture however and working with ethnographers and anthropologists in the early 20th century, much was recorded about the culture, mythology, language and places. Salinan people today have been able to recover much of their culture, language and history from this work and from the missions, archival records, family notes and oral stories. Today the Salinan people are politically composed of two major organizations along with other groups and individuals: the Salinan Tribe of Monterey and San Luis Obispo Counties and the Xolon Salinan Tribe. They are actively involved in cultural revival, working with cultural resources management and archaeology work, and practicing traditional ways continuing their legacy as a culture and people.

Northern Chumash

Northern Chumash is the northernmost of the Chumash language family, a term referring to the people who spoke dialects of Obispeño Chumash, the only language within the Northern Chumash Language branch of the Chumash Language Family. The designation Obispeño is more commonly used to refer to the language and is derived from the Mission San Luis Obispo, where Northern Chumash people were brought from the area into the Spanish mission system.

Throughout millennia of precolonial history Chumash speaking people occupied a very large portion of California from San Luis Obispo to Malibu and all of the northern Channel Islands. The Chumash language family has been found to be an isolated language unrelated to any other major language stock revealing the likelihood of its development within the California coast with possible origins to the initial colonization of this part of the continent. The Chumash culture has been described as the most complex of any of the other California tribes in terms of social dynamics, economy and material wealth during the time of European contact. Archaeological evidence has concluded that this social complexity grew out of an already advanced social framework during the Middle/Late Transition Period (see above) and rose to its levels of a chiefdom society with specialized social classes and an intricate monetary system during this time. The Northern Chumash, however lived further to the north and were more isolated from some of the social developments occurring within the Santa Barbara Channel region. Social dynamics and cultural interaction here were different than the Chumash cultures of the south with smaller populations. Researchers have emphasized the differences between the

ethnographic Chumash of the Santa Barbara Channel region and the Northern Chumash and as stated by Randy Milliken, in some ways may have had more in common with their central coast neighbors, the Salinan than with their linguistic relatives to the south (Mikkelsen, Hildebrandt, and Jones 1998).

Northern Chumash culture is based on a mixed dependency on marine and terrestrial resources and like many cultures in traditional Central California society depended largely upon an annual acorn harvest of the interior supplemented by hunting deer, rabbits, and other small game. Seasonal movements between the coast and interior were somewhat buffered by a year-round availability of marine shellfish. The nearshore marine resources are extremely abundant here such as the Pismo clams found in sandy open coastal habitats and the California mussels found in rocky intertidal habitats. Estuaries found in Pismo Beach and Morro Bay served as focal points for coastal villages throughout precolonial history where these resources were available along with avian species, fish, and marine mammals.

Chumash traditional ways were interrupted by the Spanish mission system and like the Salinan and other indigenous Californian tribes, suffered greatly at the expense of colonization. The ensuing Mexican and rancho period found many Chumash working on ranches within their traditional homelands but much of their traditional culture, language and history had been lost or stripped away by force. Assimilation impacted the Chumash people, especially near the coast and the Northern Chumash were not exempt. Despite this, individuals were able to pass down much of what they knew in terms of language, culture, history and traditional ways along to their descendants and ethnographers. Rosario Cooper was a fluent speaker of the language who was able to pass on much of what she had remembered to the ethnographer J.P. Harrington who recorded it in his work (Milliken and Johnson 2005).

Today Northern Chumash people still live in the area, with multiple family lineages and groups, who have revitalized much of their culture, language, and history. This has been done through efforts by tribal members and research into archival records, studying the notes of J.P. Harrington, family oral stories, and through the legacy of Rosario Cooper and others who contributed most of the information about Northern Chumash culture to Harrington. Groups and individuals of Northern Chumash ancestry today are based in San Luis Obispo County, including the yak titʸu titʸu yak tiłhini Northern Chumash Tribe, the Northern Chumash Tribal Council and the San Luis Obispo County Chumash Council. The Santa Ynez Band of Chumash Indians are the only federally recognized Chumash tribe. Other families of Northern Chumash heritage are spread throughout other parts California.

Playano

The *playano* language remains mysterious, as only references to it were recorded by Spanish missionaries of a dialect of Salinan being spoke along the coast from Morro Bay northward past Ragged Point. People who spoke the *playano* language were

incorporated into both the Mission San Antonio de Padua and Mission San Miguel Arcàngel with some also recruited to Mission San Luis Obispo, yet it is still unclear whether these people came from villages associated with Salinan, Northern Chumash, both, or a separate unique subgroup. Little to no documentation of the language itself exists, but ethnographic work in the early twentieth century documented some Rancherías and place names in the Cambria, Cayucos and Morro Bay region attributed to *playano* speaking people. Several Salinan and one Northern Chumash informant of J.P. Harrington spoke about the *playano* language being unintelligible to Migueleño and Northern Chumash speakers. Research into the question was addressed through a study of mission records, ethnographic work and archaeological work (Milliken and Johnson 2005) and was not able to come to a concrete conclusion, but suggested *playano* may have been a Salinan dialect which hybridized with Northern Chumash.

The San Simeon area falls within the stretch of *playano* speaking people during the time of Spanish contact and the subsequent Mission Era. It is therefore generally attributed to both Salinan and Northern Chumash cultural heritage as both groups claim to be affiliated with the *playano* people.

European Contact

European contact with this part of California began when Juan Francisco Cabrillo sailed up the coast in 1542 followed by Sebastian Vizcaino in 1602 although neither made landfall in the San Simeon area. Limited European contact had already occurred during the prior 250-year span beginning during Juan Cabrillo's expedition up the coast of California in 1542 followed by Sebastian Vizcaino's voyage in 1602, but landfall was never made in the San Simeon area during these voyages and no further contact was documented in the area until 1769. No definitive contact with the natives of northern San Luis Obispo County occurred until the overland expedition led by Gaspar de Portolá in 1769 from San Diego to Monterey during the establishment of the Spanish mission system. During this expedition, the first well documented contact was made with Salinan and Obispeño Chumash people and in the mountains between San Luis Obispo and Monterey 10 different towns were noted (Kroeber 1925). The expedition's diarist Juan Crespí along with Captain Portolá himself and Miguel Constansó documented the San Luis Obispo area and collectively these records are some of the most reliable sources of documentation of California and the natives prior to the establishment of the missions. With the first mission already established in San Diego the journey met up with Father Junipero Serra in Monterey and the second mission was established at the Presidio in Monterey. On the journey back to San Diego a third mission was established within Salinan territory at Mission San Antonio de Padua in 1771. The following year, the fifth California mission was established in San Luis Obispo where Father Serra was informed a friendly native Chumash people lived. Mission San Miguel Arcàngel was later established in 1797 as a midway point between the other two missions in the area.

An outpost for the Mission San Miguel Arcàngel was established in San Simeon to recruit local Salinan and Chumash people and establish a coastal presence. Most of the natives of the San Simeon area who had not already been recruited into the mission system went to San Miguel while a few stayed on the coast.

Much of what we now know about the native people of the San Luis Obispo area is through documentation during the mission era at those three missions. Future ethnographic work by J.P. Harrington and A.L. Kroeber greatly contributed to our current knowledge of Obispeño Chumash and Salinan culture. Furthermore, a great body of knowledge and information about native lifeways, usage of natural resources, hunting and foraging strategies, behavioral patterns, material culture, and more has been acquired through archaeological work.

HISTORIC ERA

The historic era of California officially begins with the first known European foray into the interior of the state, the overland expedition of Gaspar de Portolá in 1769, marking the beginning of direct continuous European contact with indigenous cultures of California and the beginning of Euro-American settlement. From 1769 until statehood in 1850, California went through a series of short eras as it shifted from an indigenous landscape to a focal point for western settlement and ensuing economic development. The mission system established at the onset of this period progressed rapidly with the Spanish appropriating most of coastal California into mission lands before the turn of the century until eventually disintegrating by the 1830's. Once the mission system was underway, the cultural landscape of California from the Bay Area south quickly transformed into a Spanish colonial network and indigenous societies were subverted as most of the natives south of San Francisco within close proximity to the coast were brought into the mission system. The missionized natives were subjected to horrifying conditions and their mortality rate was very high as a result of European disease and the loss of former life ways. Following the Mexican War of Independence in 1821, California became a Mexican territory, ushering a confusing decade where most of the missions continued to operate as independent Mexican ranchos.

As previously mentioned the historic era of California officially begins with the famous land expedition of Gaspar de Portola in 1769 marking the beginning of direct continuous European contact with indigenous cultures of California. In about 80 short years, California went through a series of definitive eras as it shifted from an indigenous landscape to a focal point for Western North America settlement and ensuing economic development. The mission system established at the onset of this period progressed rapidly with the Spanish appropriating most of coastal California into mission lands before the turn of the century until eventually disintegrating by the 1830's.

The Secularization Act of 1833 officially put an end of the mission system converting most of the former mission lands within 30 miles of the coast into approximately 455 ranchos granted to private ownerships in Mexican Land Grants. While missionized natives were

supposed to receive properties, nearly all of lands were granted to those of European and Mexican decent most of them tied to the existing government or recommended by the alcalde of the closest mission. This resulted in the configuration of a continuous network of large ranchos along the coast and inland valleys where former neophyte natives relocated to from the missions. An immense cattle industry began with the ranchos with an influx of Mexicans and immigrants coming to California to find opportunity. Soon thereafter in 1846 California became part of the United States and a land grab ensued. The Gold Rush of 1848 and 1849 sparked a wave of migration from Europe, Asia, Hawaii and other parts of North America. By 1850 California was a state and the population continued to increase as a melting pot of different ethnic groups and nationalities poured in. San Luis Obispo County was created at the onset of statehood and while partially isolated from the rest of the state and the effects of the Gold Rush, offered opportunity for ranching, fishing, and exploiting the rich land and abundant natural resources.

The San Simeon area had been divided into the Rancho San Simeon and Rancho Piedra Blanca during the Mexican Period, the latter being granted to José de Jesús Pico, administrator of the former Mission San Antonio. Pico sold the northern part to a Captain John Wilson in 1854, whom after his death in 1861 was inherited by Mariano Pacheco and subsequently by Juan Castro. The devastating droughts of 1863 and 1864 broke up most of the failing ranchos in the state as tens of thousands of acres were sold to opportunistic Americans. Senator George Hearst was one of those Americans and began systematically buying up lands in the area during the early 1860's, eventually buying up a majority of the former Rancho San Simeon and Rancho Piedra Blanca. Hearst established the community of San Simeon at San Simeon Bay and built a new wharf there to provide a port for timber, abalone, beef and tallow. Joseph Clark, a renowned shore whaler established whaling in 1864 utilizing the natural extensions of land at Piedras Blancas and San Simeon points (Pavlick 1990).

The insipient whaling and dairy industries out of San Simeon drew a wave of Portuguese immigrants and Swiss dairy farmers in addition to a host of other immigrant populations. As Hearst continued his pursuits the northern lands of former Rancho Piedra Blanca were further broken up as Castro sold many tracts to other families instead of Hearst including Thomas J. Evans and Peter Gillis (Carr 2007). Eventually Hearst acquired all of the land north of San Simeon Bay with exception of holdings by the Gillis family and Evans family. In 1874 the U.S. Army leased the Point Piedras Blancas property owned by the Gillis family and built the Light Station. The Evans family continued to live on the parcel where eventually the Piedras Blancas Motel was built, and the location of the current PBCT project area.

William Randolph Hearst eventually inherited the immense Hearst estate and built Hearst Castle in 1919. He became a business tycoon and drew attention to the area with his extravagant estate. By 1937 Highway 1 was completed connecting the San Simeon area to Monterey and provided for better accessibility for the thriving industries. The Hearst Corporation eventually acquired the Hearst holdings with the Hearst Castle and San Simeon area transferred to the State of California and DPR. This created a bourgeoning

tourism industry to the area as Hearst State Historic Monument became one of the largest tourist destinations in the state, while the Hearst Ranch has continued to operate as an agricultural and cattle ranching enterprise through today. In 2006 much of the coastline from San Simeon to San Carpoforo west of Highway 1 was transferred to the State of California along with a conservation easement with the Hearst Corporation and the additional 18 miles of coastline combined with then existing DPR properties to become HSSSP, part of the San Luis Obispo Coast District of DPR. The Highway 1 realignment project created additional acreage added to HSSSP once the highway was moved eastward, now being transferred from Caltrans to DPR. This acquisition and realignment of Highway 1 included requirements for the California Coastal Trail which has led to the current PBCT project.

CULTURAL RESOURCES SURVEY

To identify if cultural resources are present within or in close proximity to the proposed project area, DPR archeological staff conducted an extensive cultural resources survey. This consisted of background research, Native American consultation, and cultural resources field survey. Once the cultural resources survey was complete, DPR would design the project footprint to avoid, if possible, any cultural resources considered to be historic resources under PRC Section 5024 including any unique archaeological resources as defined under PRC Section 21083, and any significant tribal cultural resources as defined in PRC Section 21074. This section applies to the methods and results of the cultural resources survey as it pertains to CEQA compliance.

Methods

Cultural resources surveys for the project were conducted over the course of several years by SLO Coast District archaeologists consisting of background research, Native American consultation and cultural resources field survey. The survey area included the entire DPR property from the northern extent of the project area to the southern terminus of the PBCT alignment. Initially, since the project was part of the Caltrans Highway 1 realignment, the PBCT was proposed in 2014 and cultural resources surveys were conducted then by former DPR archaeologist Elise Wheeler. Further developments of the project triggered additional cultural resources survey and notification to Native American tribes during the environmental review process in 2017. More project development occurred again in 2019 during the first phase of the PBCT for the project and Native American tribal notification was re-initiated and additional cultural resources surveys were conducted.

Background research methods for identifying previously recorded cultural resources within the project area included: an extensive literature review of existing documents and manuscripts pertaining to cultural resources in the vicinity of the project area, a formal record search at the Central Coast Information Center (CCIC) of the California Historic Resources Information System (CHRIS); archival research of historic documents, archaeological site records, and technical reports within the cultural resources inventory

maintained by the SLO Coast District; and a review of historic maps. Native American consultation consisted of a search of the Native American Heritage Commission (NAHC) Sacred Land File via a formal request, along with a request to the NAHC for the Native American Contact List they keep for the geographic area of the project. Letters were then sent to all of the contacts on the list and direct consultation with Native American tribal groups who responded was conducted.

Cultural resources field survey methods consisted of intensive pedestrian survey using transects spaced no more than 10 meters apart to inspect the ground surface for any physical evidence indicating the presence of cultural resources. This included observing for archaeological deposits and/or isolated artifacts such as: archaeological features, midden soils, marine shell debris, faunal remains, lithic debitage, flaked stone tools, ground stone, charcoal and hearth rings; and any evidence for larger cultural landscape modifications, or other potential tribal cultural resources. Prior to field survey, existing site records were studied to note the description and condition of sites documented by past surveys. Existing site records and mapped boundaries were cross referenced in the field during surveys in order to determine if field observations corroborated with previously mapped site boundaries or if site boundaries were observed to be more or less extensive. All field data was recorded in field notes and locational data was collected using geographic positioning system (GPS) technology. This field data was used to modify and update site records and when necessary, updated archaeological site boundaries were mapped with geographic information system (GIS) technology using ArcGIS Pro.

The synthesized data was then used to determine if avoidance of sensitive cultural resources cultural resources located within or adjacent to the proposed project area was possible. Subsequently, during the planning stages of the project, the cultural resources survey results were used to map areas of cultural resource sensitivity. These areas were used as a design constraint to accurately define the project area for avoidance, explicitly in the design and placement of the PBCT alignment.

Background Research

Previous Studies

A formal record search was conducted with the Central Coast Information Center (CCIC) and a response was received on May 19, 2019, providing information about previously recorded resources and studies for the project area and within a 0.5-mile radius (Appendix E). Background research identified 22 previous studies that have been conducted within ½-mile radius of the project area and 15 studies conducted within the project area which are listed in a table (see Table CULT-1). Some of these studies consisted of archaeological surface surveys many with negative results, and others were conducted as part of Highway 1 improvements prior to or as part of the realignment project which led to the PBCT project. The first archaeological studies conducted in the Piedras Blancas area occurred in 1947 by A. R. Pilling resulting in the recordation of a number of prehistoric archaeological sites around Point Piedras Blancas. A number of sites north of

Point Piedras Blancas were subsequently recorded by Geneva Hamilton in 1961. As part of a resource inventory of the Hearst Ranch for the Hearst Corporation conducted in 1966, West and Sekkel performed archaeological survey of areas they presumed to be optimal locations for prehistoric habitation (West 1968). They recorded a number of additional sites located within the current survey area. Extensive review of these early surveys conducted in the area from 1947 to 1966 concluded they were accompanied by largely insufficient documentation, did not cover the entire current survey area, and locational data was found to be difficult to interpret.

A large archaeological investigation was conducted in 1991 for a proposed realignment of Highway 1 between San Simeon and Piedras Blancas (Bouey and Basgall 1991) at the southern terminus of the current PBCT project. This study determined four sites to be potentially eligible for listing in the NRHP and CRHR, but no SHPO concurrence was received. The study completed archaeological test excavations and data recovery at CA-SLO-264, -266, -267, -268, -1226, and -1227. Data recovery mitigation for CA-SLO-264 and CA-SLO-1226 occurred prior to destructive impacts from the road, which occurred for the portions of these sites west of Highway 1 which are now on DPR property and adjacent to the PBCR alignment. Another Caltrans project for a culvert and parking lot necessitated archaeological data recovery at CA-SLO-267 and CA-SLO-179 (Jones and Ferneau 2001), which are both south of the Project area. This study concluded recommendations for CA-SLO-179 to be eligible for listing in the NRHP and CA-SLO-267 to be ineligible.

The current PBCT project is part of the permanent Highway 1 realignment project for 2.8-miles of coast from Point Piedras Blancas northward, which was completed in 2018. Planning by Caltrans for the realignment began in 2000 and an extensive archaeological survey, testing, and evaluation for NRHP eligibility was conducted. Three archaeological subsurface investigations in 2001 were conducted in conjunction with a temporary realignment of a portion of Highway 1 north of Point Piedras Blancas and south of the Piedras Blancas Motel: Kiaha (2001), Levulett and Wilson (2001) and Rosenthal and Jones (2001). These studies consisted of test excavations and data recovery excavations to mitigate impacts of road work to previously recorded archaeological sites for historical significance and eligibility for inclusion in the NRHP and CRHR.

Extensive cultural resource investigations were completed in 2006 as part of the realignment project, largely overlapping with the current project area. The Archaeological Survey Report for the Piedras Blancas Realignment Project, San Luis Obispo County (Joslin 2006) identified 22 previously recorded archaeological sites and five newly recorded archaeological sites within the project area. The Historic Properties Survey Report (Levulett and Joslin 2007) summarized archaeological studies for the proposed road realignment and evaluated archaeological sites for eligibility for inclusion on the NRHP and for significance as historic resources in accordance with the provisions of CEQA. The Historical Resources Evaluation Report for the Piedras Blancas Realignment Project, San Luis Obispo County (Carr 2007) was conducted to identify historic-era (i.e., constructed in 1960 or earlier) built environment resources in the Highway 1 realignment

project area. Cultural Resource Management Services (CRMS) prepared the Archaeological Survey and Historical Evaluation of the Piedras Blancas Motel (Farrell and Hannahs 2006) for the Trust for Public Land for the transferring of the same property mentioned above to DPR.

In 2005, the Hearst Corporation sold a 13-mile stretch of coastal strip to the State of California, and the newly acquired land became part of the existing state park system renamed HSSSP. The newly acquired land included the current Project Area and it was anticipated that proposed Highway 1 realignments would result in additions to DPR for all areas west of the newly constructed roads. As extensive Caltrans archaeological work had already taken place or was still underway, coordination with Caltrans archaeologists took place for the DPR cultural resources inventory of the new portions of HSSSP, which was conducted in subsequent years. Sites which were recorded prior to the land acquisition were re-surveyed and an internal DPR database was updated.

Other relevant studies conducted within or adjacent to the project include Gibson (1990), Bouey and Basgall (1991), Jones and Ferneau (2001), Wheeler (2010), and Singer (2002). Of note, many previous surveys had been conducted when invasive iceplant and other dense vegetation heavily obscured the ground surface resulting in limited survey results and inconclusive site boundary determinations, as noted on site records and in cited reports. In addition, several of the sites were documented to have been lost to erosion following original recordation or were unable to be relocated during subsequent surveys.

Table CULT-1. Previous Studies Conducted within 0.5-mile of the Project Area.

Report No.	Title	Year and Author	Proximity to Project	Affiliation	Resources
SL-00039	Archaeological Survey Report for Bike Lanes near San Simeon in San Luis Obisop County	1978 Larry Spanne	100 meters west	Caltrans	Not evaluated
SL-00042	Preliminary Filed Reconnaissance of the Piedras Blancas Light Station, San Luis Obispo County, California	1975 Robert Gibson	400 meters southwest	Archaeological Resource Services	CA-SLO-77
SL-00082	Archaeological Survey Report for a Bike Path near San Simeon San Luis Obispo County, CA 05-SLO-1.63.8/64.5	1979 Larry Spanne	Within	Caltrans	CA-SLO-258, 931
SL-00107	State Highway 1 (64.5 – 65.4 P.M.)	1980 Smith, C.	Within	Caltrans	Not evaluated

SL-00169	Site Survey 4-SLO-T102 Piedras Blancas Quadrangle Map	1967	Within and adjacent to southwest	SLOCAS	CA-SLO-263
SL-00241	Barrow Site for Culvert Replacement West of Highway 1	1980 Smith, C.	50 meters west	Caltrans	None
SL-00286	Historic Property Survey Report Replacement of Existing Reinforced Concrete Box Culvert on Highway 1 at Arroyo del Oso: An Archaeological Survey Report of a Proposed Highway Project	1979 Cook, R. and Meacham, C.	100 meters west and within	Caltrans	CA-SLO-826 and 931
SL-02890	Archaeological Patterns Along the South Central Coast, Point Piedras Blancas, San Luis Obispo CA	1991 Bouey, Paul and Mark Basgall	Adjacent to northwest and 300 meters south	Far Western Anthropological Research Group, Inc	CA-SLO-264, 266, 267, 268, 1226, and 1227
SL-03659	Cultural Resource Investigation of the Pacific Bell Arroyo de la Cruz Line Placement	1998 Parker, John	50 west and north	Parker and Associates	None
SL-03752	Results of Phase One Archaeological Surface Survey of the Sani Property near Point Piedras Blancas Lighthouse, San Luis Obispo County, CA	1990 Gibson, Robert	Within	None	CA-SLO-1227
SL-3902	Cultural Resources Survey and Impact Assessment for a five acre property near Point Piedras Blancas, San Luis Obispo County, CA APN 011-231-001	1999 Singer, Clay	Within	C.A. Singer and Associates	CA-SLO-1276
SL-04184	Negative Historic Property Survey Report for the Upgrade and Install of Metal Beam grard Rail and Imrpove Drainage Facilities at nine locations along Route 1 in San Luis Obispo County	2000 Levulett, Valerie A.	¼-mile north	Caltrans	None
SL-04669	Historic Property Survey Report Prepared for the Rocks 1 and 3 Proposed Temporary Realignments on	2001 Kiaha, Krista	Within and covering about half of the entire project area. Part of Highway 1 realignment.	Caltrans	CA-SLO-258, 259, 826, 2156, and 2157

	Highway 1 San Luis Obispo County				
SL-04669A	Archaeological Survey Report for the Rocks 1 and 3 Proposed Temporary Realignments on Highway 1 San Luis Obispo County o	2001 Valerie A. Levulett and Kelda Wilson	Within and covering about half of the entire project area. Part of HIGHWAY 1 realignment.	Caltrans	-
SL-04669B	Extended Phase I and Phase II Archaeological Investigations at CA-SLO-258, CA-SLO-2156, and CA-SLO-2157 for the Temporary Realignments on Highway 1 San Luis Obispo County, CA	2001 Jeff Rosenthal, Deborah Jones, Kate Ballentyne, Bill Hildebrandt, Eric Wohlgemuth, and Elizabeth Honeysett	Within and covering about half of the entire project area. Part of HIGHWAY 1 realignment.	Far Western Anthropologial Research Group	CA-SLO-258, 2156, and 2157
SL-04866	On the Mitigation of Site CA-SLO-2183: Phase III Monitoring at the Todd House 16485 Pacific Coast Highway, Near Point Piedras Blancas in San Luis Obispo County, CA APN011-231-001	2002 Singer, Clay A.	50 meters west	C.A. Singer and Associates	CA-SLO-2183
SL-05715	Archaeological Inventory and Assessment of Site CA-SLO-77	2006 Arrington, C. J. Clifford, and A Wesson	400 meters southwest	SWCA Environmental Consultants	CA-SLO-77
SL-04689	Prehistory at San Simeon Reef, Archaeological Data Recovery at CA-SLO-179 and -267, San Luis Obispo County, CA	2001 Jones, Terry and Ferneau, Jennifer	¼-mile south	Caltrans	CA-SLO-179 and 267
SL-05958	Archaeological Survey and Historical Evaluation of the Piedras Blancas Motel, San Simeon, San Luis Obispo County, CA ANP 011-231-012	2006 Farrell, Nancy and Todd Hannahs	Within	Cultural Resource Management Services	CA-SLO-1276, 1277, 2155, 2157, 2183, 2432, 2433, 2434
SL-06017	Archaeological Survey Report for the Piedras Blancas Realignment Project, San Luis Obispo County, CA 05-SLO-1, PM 62.65-66.8	2006 Joslin, Terry L	Within and encompassing nearly the entire project area. This is the most relevant study.	Caltrans	CA-SLO-257, 258, 259, 261, 262, 263, 264, 265, 266, 276, 388, 826, 931, 1226, 1276, 1277, 2155, 2157, 2183, 2432, 2433, 2434, 2435

SL-06296	Archaeological Investigations at CA-SLO-1277, a site near Piedras Blancas Point in San Luis Obispo County, CA	2007 Singer, Clay A.	Within	C.A. Singer and Associates	CA-SLO-1278, 2183
SL-06788	Historic Resources Evaluation Report for the Piedras Blancas Realignment Project, Piedras Blancas Motel, San Luis Obispo County, CA	2007 Carr, Paula J.	Within	Caltrans	Piedras Blancas Motel

Previously Documented Historical Resources

As mentioned, in 2006 Caltrans prepared the Historical Resources Evaluation Report for the Piedras Blancas Realignment Project, San Luis Obispo County (Carr 2007). In addition, the Archaeological Survey and Historical Evaluation of the Piedras Blancas Motel (Farrell and Hannahs 2006) was also conducted for the Trust for Public Land. These reports identified and evaluated two sites within the PBCT project area for historical significance as defined by the CEQA statutes: The Evans Farmstead and the Piedras Blancas Motel. Both of these resources were found to be ineligible for listing in the NRHP. A brief discussion of these two properties is presented below.

The Evans Farmstead consists of a long windbreak of mature cypress and eucalyptus trees and a small cluster of farm buildings that include a farmhouse (circa 1905), a garage and utility buildings. These surviving components are what was formerly a larger farmstead established by pioneering north coast settler Thomas J. Evans in 1869.

The Piedras Blancas Motel site consists of a single-story motel that was in operation since the 1960's and includes a residence on the southern portion of the site. The residential cluster includes a house constructed in 1959, a detached garage and assorted sheds. In addition to the motel units and office, the north end of the site includes a decommissioned gas station, small restaurant, a garden area with benches and a shed. The buildings have undergone several alterations between 1979 and 2005. The bluffs between the motel and southern structures were opened to RV camping by 1979. RV camping became more prevalent in this area by 2002 and continued to be more common up until 2004. By 2004 the property was purchased by the California Coastal Conservancy and all camping ceased. The section of the PBCT has already been constructed along this property and the current PBCT project will connect with this existing trail on either end.

No other historic-era resources are documented on DPR property. The historic Piedras Blancas Light Station, listed on the NRHP, is located on the adjacent BLM property and the PBCT project will not cross any known historic resources related to this historic property. Other historic-era resources in the area include ranching and Chinese seaweed farming sites, but none are known within the PBCT alignment area.

Previously Documented Archaeological Resources

Background research identified a total of 33 previously documented archaeological sites located within 0.50-miles of the project area and 29 located on DPR property. Of these, 10 were found within or immediately adjacent to the proposed PBCT alignment. These are: CA-SLO-17, -18, -19, 258, 259, 267,826, 931,1226, and 2157 (see Table CULT-1).

Of the 10, five sites (CA-SLO-258, 267, 1226, 2156, 2157) were found to have previously undergone extensive subsurface archaeological investigations (Bouey and Basgall 1991, Caltrans 1992:7, Rosenthal and Jones 2001, and Jones and Ferneau 2002) resulting in determinations of ineligibility for listing in the NRHP and the CRHR, as supported by concurrence from the California State Historic Preservation Officer (SHPO). Conversely, two sites (CA-SLO-264 and CA-SLO-265) were determined to be eligible for listing in the NRHP and CRHR with concurrence from the SHPO, but the portion of those sites that is eligible is within the Caltrans ROW or east of Highway 1. Bouey and Basgall (1991) conducted data recovery at six sites, CA-SLO-264, -266, -267, -268, -1226, and -1227 of which only CA-SLO-1226 is directly within the PBCT alignment. This site was determined to lack any dietary constituents and lacked subsurface depths of deposition, rather the site was found to be a lithic tool working site of flaked and battered stone suggestive of brief, intermittent use, with the absence of formal and diagnostic tools. The PBCT alignment will pass along the western boundary of this site. Joslin (2006) found one site to have been lost to coastal bluff retreat (CA-SLO-1278) confirming documentation by Singer (2002). The remaining three sites: CA-SLO-18, CA-SLO-259, and CA-SLO-261 are surface lithic scatters where the PBCT alignment will pass adjacent to the east and avoid.

The remaining 15 sites within the survey area were found to lack any archaeological investigation beyond surveys and therefore have not been evaluated for NRHP or CRHR eligibility. Of these, Joslin (2006) concluded one site was unable to be relocated (CA-SLO-261) and another had been formerly mapped incorrectly (CA-SLO-931) and proposed incorporating it into an adjacent site (CA-SLO-258). Two sites (CA-SLO-264 and -267) formerly determined to be eligible for listing in the NRHP and CRHR (Jones and Waugh 1995) were found to be located inland from Highway 1 and no evidence of site material on DPR property remains.

Overall, background research identified an abundance of existing cultural resources documented within or adjacent to the survey area. Many of these resources were found to be confined to discrete boundaries located along the coastal bluffs, adjacent to drainages, or had been subject to previous disturbance by coastal bluff erosion, Highway 1 construction and subsequent realignments. No archaeological resources were identified in previous studies on the former Piedras Blancas Motel property, during the previous phase of PBCT construction, following two intensive surveys (Joslin 2006 and Farrell and Hannahs 2006). In addition, and as previously mentioned, many former surveys conducted within the PBCT survey area occurred when invasive ice plant and other dense vegetation heavily obscured the ground surface resulting in limited survey results and

inconclusive site boundary determinations, and original surveys were conducted prior to GPS technology and therefore did not have accurate site boundary information. This was impetus for the current study to include precise archaeological field surveys to confirm and/or update existing cultural resource data on DPR property.

Table CULT-1. Previously Recorded Archeological Sites within 0.5-mile of the Project Area

Site Trinomial	Site Type	Setting	NRHP Eligibility
CA-SLO-17	Lithic scatter, flaked stone tool and sparse shell midden	Marine terrace and dune	Not evaluated
CA-SLO-18	Dense midden and lithic scatter with tools and habitation debris	Marine terrace and dune	Not evaluated
CA-SLO-19	Dense shell midden with habitation debris flaked stone tools and lithic scatter	Marine terrace and dune	Not evaluated
CA-SLO-20	Lithic scatter extending from bluff edge east to former Highway 1 alignment	Marine terrace and dune	Not evaluated
CA-SLO-21	Lithic scatter and sparse shell midden	Marine terrace and dune	Not evaluated
CA-SLO-77/H	Historic and Shell midden and dense lithic and tool scatter with multiple loci	Marine terrace and headland	Listed on NRHP
CA-SLO-120	Lithic scatter	Marine terrace	Not evaluated
CA-SLO-242	Lithic scatter and sparse shell midden	Marine terrace and dune	Not evaluated
CA-SLO-243	Lithic scatter and sparse shell midden	Marine terrace	Not evaluated
CA-SLO-256	Dense shell midden and wide lithic scatter with groundstone and flaked stone tools	Marine terrace	Not evaluated
CA-SLO-257	Lithic scatter	Marine terrace	Not evaluated
CA-SLO-258	Lithic scatter	Marine terrace	Ineligible (Rosenthal and Jones 2001)
CA-SLO-259	Lithic scatter with debitage, cores and tools	Marine terrace	Not Evaluated
CA-SLO-260	Lithic scatter and sparse shell midden	Marine terrace	Not Evaluated
CA-SLO-261	Lithic scatter and sparse shell midden	Marine terrace	Not Evaluated
CA-SLO-262	Sparse lithic scatter and sparse midden	Marine terrace	Not Evaluated
CA-SLO-263	Sparse lithic scatter	Marine terrace	Not Evaluated
CA-SLO-264	Dense shell midden and wide lithic scatter with groundstone and flaked stone tools	Marine terrace	Ineligible (Joslin 2006).
CA-SLO-265	NRHP eligible midden site with sparse lithic off DPR property and lithic scatter ineligible portion on DPR property and partially destroyed from Highway 1	Marine and stream terrace	NRHP eligible not on DPR land; ineligible portion on DPR property (Hildebrandt et al 2007).
CA-SLO-266	Dense shell midden	Marine terrace	Eligible (Jones and Ferneau 1998)
CA-SLO-267	Dense shell midden	Marine terrace	Eligible (Jones and Ferneau 1998)
CA-SLO-283	Sparse lithic scatter	Marine terrace	Not evaluated
CA-SLO-284	Sparse lithic scatter	Marine terrace	Not evaluated
CA-SLO-388	Shell midden with faunal remains, lithics and FAR within an eroding dune landform sloping onto active beach	Marine terrace and dune along beach	Not evaluated
CA-SLO-826	Lithic scatter, two loci and small midden deposit	Former marine terrace destroyed by Highway 1 work	Ineligible (Hildebrandt et al 2007).
CA-SLO-931	Sparse lithic scatter	Originally mis-mapped no longer present	N/A Joslin 2006

CA-SLO-1226	Lithic site with no midden or dietary remains	Marine terrace	No SHPO concurrence but recommended eligible (Bouey and Basgall 1991)
CA-SLO-1277	Lithic scatter	Marine terrace	Not evaluated
CA-SLO-2156	Lithic scatter impacted by HIGHWAY 1	Marine terrace	Ineligible (Rosenthal and Jones 2001).
CA-SLO-2157	Lithic scatter	Marine terrace	Ineligible (Rosenthal and Jones 2001).
CA-SLO-2183	Lithic scatter	Marine terrace	Not evaluated
CA-SLO-2390	Lithic scatter	Marine terrace	Not evaluated
CA-SLO-2435	Lithic scatter	Marine terrace	Ineligible (Hildebrandt et al 2007).

Cultural Resources Field Survey

Field survey resulted in the field truthing of previously recorded archaeological sites within the survey area and the identification of new information regarding existing site boundaries of known archaeological sites. Field survey was conducted initially by then District archaeologist Elise Wheeler in 2014 for the entire project and south of Point Piedras Blancas following prescribed burning activities. Survey was again conducted by current District Archaeologist Chad Jackson over the course of multiple seasons from 2019-2020. As mentioned, most of the survey area had already been subject to prior archaeological surveys, first during the 1940s, 1960s and 1970s, then during Caltrans work in the late 1990s and early 2000s. Varying methods and poor ground surface visibility in some of those prior surveys, as indicated on site records, had resulted in low levels of reliability. During the planning phase of the Highway 1 realignment projects, which included two temporary projects before the permanent highway realignment was completed in 2018, extensive archaeological survey, testing and data recovery occurred directly within or adjacent to the current project area, which as mentioned is funded and driven by the road work (Kiaha 2001; Levulett and Wilson 2001; and Joslin 2006). The survey during 2005 (Joslin 2006) was conducted during poor visibility as well, and some of the previously identified sites were not relocated.

Preliminary field survey during the initial planning by DPR for the PBCT project, was conducted by DPR archaeologists beginning in February 2014 in order to plan for the alignment and overall PBCT design. Prescribed burning of the vegetation along the coastal bluffs in Fall 2013 and subsequent eradication of invasive non-native ice plant provided excellent ground surface visibility during survey. This resulted in the observation of cultural material on the surface in areas not previously documented and the subsequent expansion of previously recorded archaeological site boundaries. It was concluded that there was a much wider lithic scatter than previously recorded during times when vegetation obscured visibility.

From this survey work the PBCT alignment along the portion of coast adjacent to these resources, was pushed to the east in order to avoid coming within the newly adjusted site boundaries of these sites. The PBCT alignment will not cross any of these resources.

Subsequent follow up surveys of the project area were conducted following the recent Highway 1 realignment in 2019 on the following dates: January 31, February 21 and 25, March 28, and April 11, 12, 16, 17, 25, 26, 29, 30. GPS data was collected and used to

re-map the site boundaries for the above referenced sites, taking into consideration the 2014 data, which did not include GPS. Additional surveys were conducted again in 2020 and 2021 with GPS survey data for the entire PBCT alignment, resulting in newly established site boundaries, and incorporation of existing conditions following the Caltrans work and Highway 1 realignment.

Field survey also resulted in the relocation of one site CA-SLO-261, which was not relocated and thought to have been lost to bluff erosion during surveys in 2005 (Joslin 2006). Additionally, a new previously undocumented cultural deposit was found along the bluff edge near CA-SLO-262 and adjacent to CA-SLO-263, both originally recorded in 1966. The PBCT alignment will avoid these resources. Field survey of the proposed Northern Lighthouse Beach Parking Area expansion confirmed the extent of CA-SLO-259 was well outside the proposed PBCT project area. Although the former site boundaries of CA-SLO-2156 appeared to be partially within the project area, no physical evidence of the site was observed, and it was concluded that the recent Highway 1 alignment removed any remaining portion of the site within DPR property. Survey of the PBCT alignment along the boundaries of CA-SLO-1226 did not observe any prehistoric artifacts or lithic scatter, as prior Highway 1 work has removed remaining portions of the site, or the site boundaries were not within the alignment as previously mapped (Bouey and Basgall 1991). Field survey of the PBCT alignment north of Arroyo del Corral did not identify any cultural resources within the project area both prior to and following the recent Highway 1 realignment.

Results of the cultural resources field survey corroborated with existing cultural resource documentation obtained during background research and identified new boundaries for several archaeological sites following intensive field surveys over multiple seasons and after prescribed burning activities enhanced surface visibility. . This led to the collection of new information about previously documented cultural resources and updated spatial data. This information was synthesized with existing and updated site boundaries plotted on maps with a 50-foot buffer to create cultural resource sensitivity avoidance areas. This was then used to identify a project area that could allow for minor changes in the alignment during construction while maintaining the avoidance of all sensitive cultural resources. This was incorporated into the design and placement of the PBCT alignment to avoid all archaeological sites previously determined to be eligible for listing in the NRHP/CRHR and those not formally evaluated.

IMPACT ANALYSIS

The following impact analysis contains each specific impact and corresponding mitigation measure as they relate to the defined thresholds of significance for cultural resources.

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

DISCUSSION

a) Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No historical resources are within the project area. Initial and subsequent cultural resources survey results were used in the designing of the overall project and the placement of the PBCT alignment to avoid all potential historic resources and those previously determined to be eligible for listing in the NRHP and/or CRHR. Those which have not been subject to evaluation for NRHP and/or CRHR eligibility will also be avoided. Cultural resource surveys did identify historic resources within the survey area and those results were used to ensure all existing historic resources and potential historic resources were avoided in the design and placement of the PBCT alignment, and the offsite mitigation.

Four archaeological sites previously determined to be ineligible for listing in the NRHP and CRHR will be partially bisected by the PBCT alignment. The bisected areas that will be impacted by PBCT construction have already been subject to previous disturbance by Highway 1 improvements. These resources have received letters of concurrence from the SHPO addressing their ineligibility as historic resources and/or historic properties.

Conclusion: No impact.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?

No unique archaeological resources as defined by Section 21083.2 are anticipated to be impacted by the project. Although archaeological sites that do qualify as historic resources and/or unique archaeological resources were identified within the vicinity of, and adjacent to the project area, the project was designed to avoid them. Results of the cultural resource surveys for the project were used during initial project design to avoid

any sensitive cultural resources. In addition, the four archaeological sites that will be partially bisected by the PBCT alignment do not qualify as unique archaeological resources as defined in CCR Section 15064.5. Pursuant to CCR Section 15064.5 (f) any unanticipated archaeological discoveries due to project construction will result in an immediate halting of work and the District Archaeologist will be notified to inspect the find. If the discovery has potential to yield a unique archaeological resource, steps will be taken to evaluate the find. There are sensitive cultural resources in the vicinity of the project area, therefore; as a precautionary measure, some archaeological and Native American monitoring will occur in areas within 50 feet of known archaeological site boundaries and/or culturally sensitive areas, as described in the specific project requirements CULT-4.

Conclusion: Less than significant impact.

c) *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

No disturbance to any archaeological sites known to contain human remains will occur. The PBCT alignment was designed to avoid any sensitive cultural resources and grading for the PBCT would be restricted to 18" below the original surface. Buried archaeological deposits that have not been previously documented may exist in the project area given its proximity to sensitive archaeological sites. However, it is highly unlikely any human remains will be disturbed by the project due to the minimal depth of any grading associated with the PBCT and the project's avoidance of sensitive archaeological sites.

In the event of an unanticipated discovery of cultural resources or potential human remains, an immediate halting of work in the vicinity of the find will result and the District Archaeologist will be notified to inspect the find. If the District Archaeologist or another qualified archaeologist suspects that human remains have been unearthed, steps will be taken pursuant to Section 15064.5 (e).

Conclusion: Less than significant impact.

STANDARD PROJECT REQUIREMENTS

CULT-1: Cultural Resource Awareness Training

- Prior to the start of ground disturbing activities, cultural resources awareness training will occur for all construction staff. The purpose of the training will be to educate construction personnel as to the potential presence of historic resources and/or archaeological resources within subsurface soils and that DPR staff and tribal monitors may be onsite to inspect for such resources within excavations. Staff will be educated on the appearance and types of objects that may constitute historic or archaeological resources and instructed to refrain from disturbing these

resources. The staff will be instructed to halt work in the event any such cultural resources are unearthed or encountered on the surface.

CULT-2: Inadvertent Discovery and Treatment Plan

- If any previously undocumented cultural resources are inadvertently encountered within project excavations (including but not limited to dark soil containing, bone, flaked stone, ground stone, or deposits of historic trash), work within the immediate vicinity of the find will be halted or diverted until the District Archaeologist, or a DPR-qualified cultural resource specialist has evaluated the find and implemented appropriate treatment and regulatory compliance, including contacting a Native American tribal monitor and drafting an Archaeological Treatment Plan.

CULT-3: Human Remains

- In the event human remains are discovered work will cease in the immediate area of the find until further notice and the onsite DPR representative will notify the District Archaeologist or District Superintendent Designee who will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code, and the Native American Heritage Commission (NAHC). Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered. In addition, the DPR district archaeologist will notify the SLO County Environmental Coordinator (or authorized representative) of the discovery.
- The SLO County Coroner will make the determination of whether the human remains are of Native American origin and will contact the NAHC in Sacramento, who will then identify a most likely descendant (MLD). Once appointed, the MLD will then have 24 hours to visit the site, inspect the find and recommend appropriate treatment and disposition of the remains. Work will not resume in the area of the find until proper disposition is complete (PRC §5097.98). No human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the site prior to determination.

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 tityu tityu yak tiłhini 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.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

VI. ENERGY

ENVIRONMENTAL SETTING

Pacific Gas & Electric (PG&E) provides natural gas and electricity services to the region. PG&E is a regulated public utility that provides energy service to 16 million people through 5.3 million electric distribution accounts 4.4 million natural gas distribution accounts in a majority of central and northern California. Their service area spans 70,000 square miles. In 2018, PG&E's energy mix consisted of 33 percent from renewable energy sources (PG&E Corporation, 2015). An existing pole line supporting a PG&E 12kV system is located along Highway 1. The project does not include the use of electrical energy. No new electrical structures or electrical service will be needed for the PBCT project.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

DISCUSSION

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction of the PBCT project would occur intermittently in phases based on available funding. Construction activities would consume energy through the operation of heavy equipment, trucks, and worker traffic, primarily by gasoline powered small equipment. The contractor would use only as much heavy equipment as needed to construct the project so by definition, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction. Operationally, energy would be consumed by users to travel to the trail and through the District's routine maintenance of the facility. The Project will however, benefit from several green building standards and alternative energy systems that are already in place at the District

headquarters in San Simeon. These include a 672-kilowatt photo voltaic solar array serving the District Office complex and the maintenance yard. In addition, the District already maintains a fleet of EV's that continues to grow. This will continue to reduce the consumption of gasoline in the District in favor of cleaner, renewable electricity.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Construction of the PBCT project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The project does not include installation of equipment or infrastructure that will use electricity or other sources of energy. The project supports only passive recreation such as hiking and biking. Charging stations remain available for EV users at the Hearst Castle Visitor Center parking lot located approximately 4.5 miles southeast.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

AVOIDANCE AND MINIMIZATION MEASURES

None required.

VII. GEOLOGY AND SOILS

This section provides the setting and scope for the environmental impact analysis of the MND for Geology and Soils, which contains a discussion on the environmental setting focusing on what resources are present within and adjacent to the Project site. For the analysis of geology and soils, this MND focuses on the potential for the Project to increase risk of exposure to fault or seismic activity, result in substantial erosion, or increase risk to life or property. This analysis of geology and soils is designed to identify and assess the potential impacts associated with both project construction and project operation.

Thresholds of significance are used to determine the significance of environmental impacts for each issue area. They are based on the Initial Study Checklist included in Appendix D of the CEQA Guidelines and modified as needed to address potential Project impacts.

REGULATORY SETTING

Alquist-Priolo Earthquake Fault Zoning Act (1972)

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 and updates (California Public Resources Code [PRC], Section 2621, et seq.) is the primary statutory regulation concerning the impacts of earthquakes on construction projects and provides guidelines to prevent placement of habitable structures on the surface trace of active earthquake faults. If an active fault is found to be within the footprint of a structure for human occupancy, it must be set back from the fault far enough to satisfy safety measures, depending on the fault in question. The Alquist-Priolo Earthquake Fault Zoning Act only addresses the hazard of surface fault rupture; it does not consider other earthquake hazards.

Alquist-Priolo Earthquake Fault Zones (A-P fault zones) are designated areas within 500 feet of a known active fault trace. The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Division 7, Chapter 2.5) requires the delineation of earthquake faults for the purpose of protecting public safety. Faults included in the Alquist-Priolo Earthquake Fault Zoning Program are classified by activity as follows (CGS 2007):

- Faults classified as “active” are those that have been determined to be “sufficiently active and well defined,” with evidence of movement within Holocene time (within the past 11,000 years).

- Faults classified as “potentially active” have shown geologic evidence of movement during Quaternary time (within the last 1.6 million years).

- Faults considered “inactive” have not moved in the last 1.6 million years.

Seismic Hazard Mapping Act (1990)

The Seismic Hazard Mapping Act (SHMA) was adopted by the State in 1990 to address potential hazards associated with secondary effects of seismic activity, including: strong ground shaking, soil liquefaction, ground failure and landslides. The CGS prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazard zones are referred to as "zones of required investigation" because site-specific geological investigations are required for construction projects located within these areas. Before a project can be permitted, a geologic investigation, evaluation, and written report must be prepared by a licensed geologist to demonstrate that the potential hazards can be successfully mitigated.

California Building Code (2016)

The California Code of Regulations (CCR), Title 24, Part 2, the California Building Code (CBC), provides minimum standards for building design in the State. Local codes are permitted to be more restrictive than Title 24, but not less restrictive. The procedures and limitations for the designs of structures are based on site characteristics, occupancy type, configuration, structural system height, and seismic design category. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in California Occupational Safety and Health Administration (Cal/OSHA) regulations (CCR, Title 8).

California Health and Safety Code. Sections 17922 and 17951–17958.7 of the California Health and Safety Code require cities and counties to adopt and enforce the current edition of the CBC, including a grading section. Chapter 18 regulates excavation, foundations, and retaining walls. Chapter 33 contains specific requirements pertaining to site demolition, excavation, and construction.

Public Resources Code. Section 5097.5 of the Public Resources Code provides for the protection of cultural and paleontological resources and prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

Construction General Permit. Stormwater discharges from construction activities in California are regulated by the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-009-DWQ, NPDES No. CAS000002 (Construction General Permit). The Construction General Permit regulates construction activity that disturbs at least 1 ac of total land area. The Construction General Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that describes the Erosion Control and Sediment Control Best Management Practices (BMPs) that would be implemented during construction to control erosion and sedimentation, particularly during storm events. Construction projects undertaken by State agencies are subject to the California Building Standards Code, or the California Building Code (CBC), Part 1 through

12 of Title 24 of the California Code of Regulations (C.C.R.) as interpreted and enforced by the office of the California Department of General Services, Division of the State Architect (DSA). The CBC establishes guidance for foundation design, shear wall strength, and other structurally related concerns. The CBC modified previous regulations for specific conditions found in California and included a large number of more detailed and/or more restrictive regulations. For example, the CBC includes common engineering practices requiring special design and construction methods that reduce or eliminate potential expansive soil-related impacts.

The CBC requires structures to be built to withstand ground shaking in areas of high earthquake hazards and the placement of strong motion instruments in larger buildings to monitor and record the response of the structure and the site of seismic activity. Compliance with CBC regulations ensure the adequate design and construction of building foundations to resist soil movement. In addition, the CBC also contains drainage requirements in order to control surface drainage and to reduce seasonal fluctuations in soil moisture content.

Paleontological Resources.

Paleontological resources are classified as non-renewable scientific resources and are protected by state statute (PRC Chapter 1.7, Section 5097.5, Archeological, Paleontological, and Historical Sites and Appendix D of the State CEQA Guidelines).

> "No person shall knowingly and willingly excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological, or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historic feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands."

PRC 5097.5 also requires mitigation for impacts to paleontological resources by stating that adverse impacts to paleontological resources from developments on public (state, county, city and district) lands require reasonable mitigation.

Department Policy

DPR adheres to CEQA requirements for paleontological resources and for projects subject to CEQA level environmental review where DPR acts as the lead agency the following applies. The DPR Department Operations Manual 300, Natural Resources Division, Site Development Policy for Soils and Paleontological resources (DOM 0308.1 and DOM 0309.2). DPR Operations Manual, Site Development Policy states DPR will:

> "conserve the soils of the State Park System (0308.1)" and

"Sites proposed for development will be evaluated for paleontological resources in the preliminary planning stage. Stabilization of paleontological resources may be required to prevent loss but will be done in ways that protect the integrity of the sites." And, that:

"Paleontological resources will be protected, preserved, and managed for public education, interpretation, and scientific research (0309.1)."

ENVIRONMENTAL SETTING

Geomorphic Setting

The project lies in the Coast Range Geomorphic Province. The project route follows the coastal plain between the coastal bluffs and the base of the Santa Lucia Mountains. The coastal plain has broad, gently sloping marine terraces that have been dissected by coastal streams. The geology of the coastal plain consists of marine sedimentary formations overlying Franciscan mélange bedrock. The marine formations are composed of sand and conglomerate overlain by fine-grained silty sand (Chipping 1987).

The Piedras Blancas marine terrace is the primary geologic feature of the project area, which takes place entirely within it. The Piedras Blancas marine terrace is a late-Pleistocene terrace formation uplifted during the last glacial period and composed of approximately 125,000-year-old marine deposits (Manson 1985).

Geologic units include The Cambria Slab, extending from Villa Creek to San Simeon Creek and the San Simeon Terrain (IV-4) - A mass of ophiolite, Franciscan Formation, Lospe Formation, and Monterey Formation - located on the west side of the San Simeon fault between San Carpoforo and San Simeon. The Cambria Slab refers to a large, 5,000' thick block of Cretaceous sediments that are surrounded by the Franciscan Formation and could possibly be classified as part of that unit. The rocks are of late Cretaceous age, and strongly resemble thrusted into their locations but deposited in a basin that was floored by the Franciscan on the landward side of an oceanic trench (Lee Wong and Howell, 1977).

Sandstones lie within a wavecut platform and marine terrace from Cambria to San Simeon. The San Simeon Terrain moved to the area along the San Simeon-Hosgri fault system. Cowan examined mélanges between San Simeon Creek and San Simeon, concluding the blocks of exotic blueschist and other high grade metamorphic rocks were first introduced to the clays and low grade wackes, such as chert and greenstone, through a landslide on the sea floor (Hall 1979). Rocks such as the blueschist would have been brought tectonically to the surface upslope of the site of mélange formation, the landslide itself would then be re-subducted, sheared, or deformed to give the texture seen today.

Faulting and Seismicity

Active and potentially active faults are present within 25 miles of the project area. Alquist-Priolo Earthquake Fault Zones (A-P fault zones) are designated areas within 500 feet of a known active fault trace. A search of the potentially active fault zones of the project area was conducted on October 16, 2023, by DPR. The results provided a summary report and associated maps. One study was found and requested: *San Simeon Fault Zone and Cambria Fault, San Luis Obispo County, California* (Manson 1985). The study identified potentially active faults within proximity to Piedras Blancas and the project area determined to fall with the criteria of "sufficiently active and well-defined" under the Alquist-Priolo Earthquake Fault Zoning Act.

The San Simeon Fault Zone, which lies approximately 2 miles north of the project area, was identified by Hall (1976), and is considered an onshore segment of the offshore San Gregorio-Hosgri fault zone. San Simeon fault zone and extends from the coast north of San Carpaforo and merges with the San Simeon fault in the vicinity of San Simeon and the project area. The San Simeon fault extends for 12 miles along the land from Piedras Blancas to San Simeon along the base of the broad peninsula, the surface characterized by marine terraces and younger steep-walled ravines and canyons (Chipping 1987). West of the fault is uplifted seafloor which has resulted in the exposure of the fault here, where elsewhere the fault lies just offshore underlain by marine sediments. Monterey Formation siliceous shales, Pliocene fossiliferous sandstone and conglomerates, and Franciscan melange, are found along Arroyo Laguna watershed at the main trace of the fault line. Approximately 80-95 km of right-lateral strike slip displacement has occurred along the northwest trending San Simeon – Hosgri fault zone since Miocene times (Manson 1985). The Arroyo Laguna fault is the easternmost of the South of Arroyo de la Cruz the fault offsets Pleistocene marine terrace deposits to some degree but does not displace Holocene alluvial deposits in any of the drainages. During the Pleistocene, right-lateral strike slip movements along San Simeon were up to 1500 feet (Lawson 1985).

The Arroyo del Oso fault is a west-northwest trending fault that branches off the San Simeon fault near Oak Knoll Creek, approximately 5 miles east of the project area, and extends westward north of the project area where it goes offshore between Arroyo de la Cruz and Arroyo del Oso. The proposed project will cross the Arroyo del Oso fault approximately 100 meters west of the Arroyo del Oso creek crossing (see Figure Geo-1).

The closest faults are the San Simeon, Hosgri and Oceanic faults with traces of these faults trending north-northwest and roughly parallel Highway 1. These faults are capable of producing up to a 7.5 (Richter scale) Maximum Credible Magnitude earthquake with a corresponding 0.7 g (gravity) acceleration. The chance of a ground rupture is considered low, while the potential for loss of soil strength due to liquefaction during a seismic event is moderate. These faults have been mapped as being possibly active, based on offsets of terrace deposits along the coast at San Simeon Cove, Arroyo del Oso, and San Carpoforo Creek (Hall 1979). The San Simeon earthquake of 2003 measured at a 6.6 on the Richter scale with an epicenter approximately 7 miles northeast of the town of San

Simeon and 7 miles east-northeast of Hearst Castle. The earthquake was the result of thrust faulting likely within the Oceanic fault zone of the Santa Lucia Mountains and not directly tied to the San Simeon-Hosgri fault zone (Yashinsky 2004). No other major earthquakes were noted in desktop research that were centered around the San Simeon area.

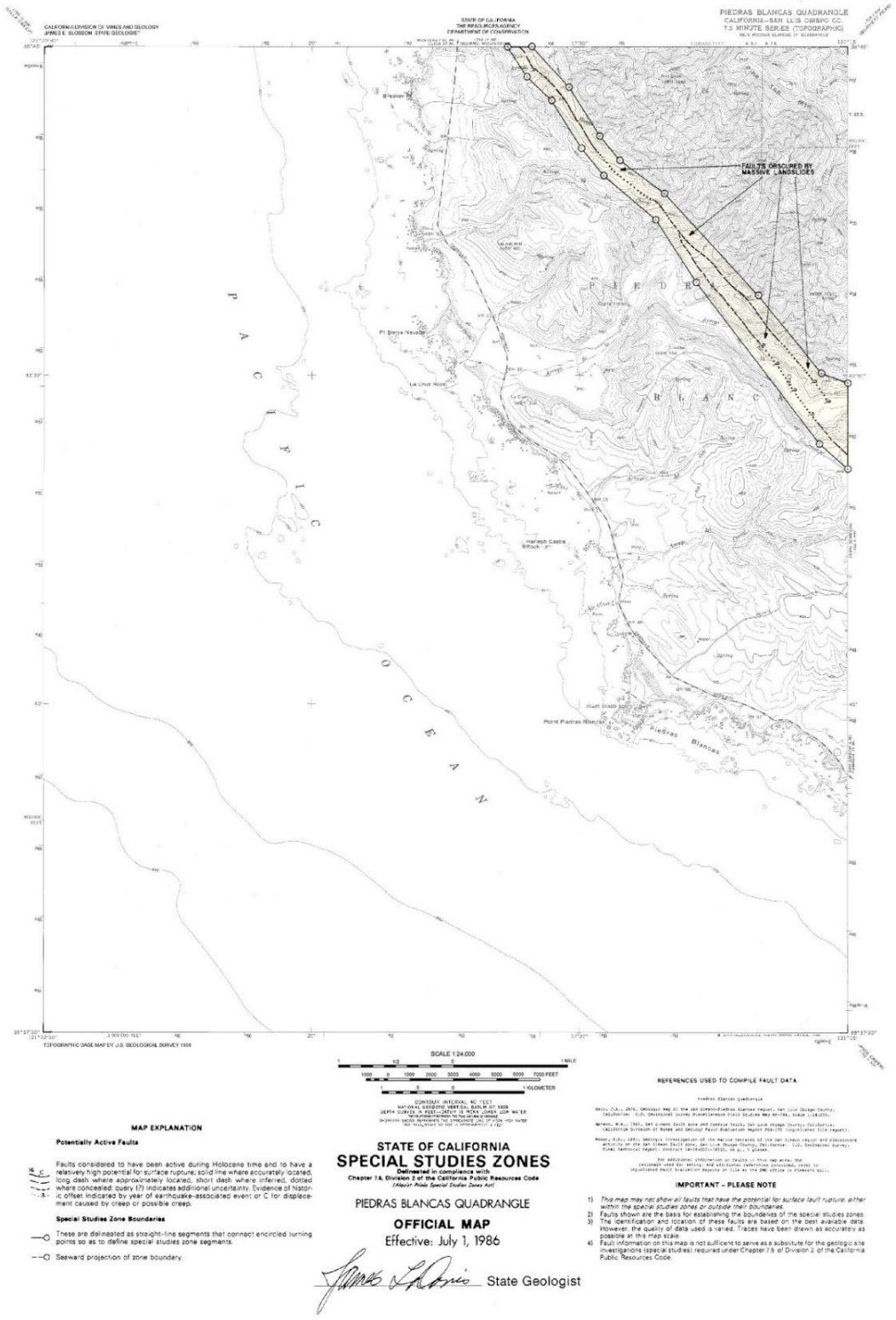

Figure GEO-1: Fault map for Piedras Blancas

Soils and Bluff Retreat

The project site is located along a coastal terrace between the realigned Highway 1 corridor and a bluff top overlooking the Pacific Ocean. Sea level rise associated with climate change is expected to increase coastal erosion and flooding hazards along the California Coast. Soils in the project area are Concepcion Loam and according to the Natural Resource Conservation Service (NRCS) these soils along the PBCT project area have a low to moderate susceptibility for erosion. According to a bluff erosion, wave run-up and site flooding/tsunami assessment prepared for the Piedras Blancas Motel site in 2015 (Geosolutions 2015) the bluff has been retreating at a rate of 4.7 inches to 10.9 inches a year for a period of 58 years (1957-2015). Bluff retreat is expected to continue at an increasing rate over the next century with an estimate of 68-feet over a 75-year period with a retreat rate of 10.9 inches per year (Geosolutions 2015).

Based upon available historical data regarding tsunami inundation due to near-source and distant-source causative earthquakes, it is unlikely that a tsunami-generated tidal surge would reach the PBCT area that lies at an elevation of over 30 feet above mean sea level.

Paleontological Resources and Unique Geological Resources

A paleontological resources survey was completed for this IS/ND consisting of background research and a field survey conducted in tandem with the cultural resources field survey. Background research consisted of a literature review of known and published documents concerning paleontological resources and unique geological features within the vicinity of the project area. Results of the background research concluded the project area is not within a geologic unit or soil series known to be sensitive for paleontological resources. A search of the University of California, Berkeley Museum of Paleontology collections database did not identify any previously documented paleontological resources within the boundaries of the project. The project area was shown as having low to no potential for encountering paleontological resources. In addition, no paleontological resources or unique geological features were noted during the cultural resources field survey for the project.

No unique geological features are found within the project area. There are no natural landmarks in the project area listed in the National Register as identified in the Historic Sites Act of 1935.

IMPACT ANALYSIS

The following impact analysis contains each specific impact and corresponding mitigation measure as they relate to the defined thresholds of significance for Geology and Soils.

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems, where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

DISCUSSION

a.i) Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-riolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

None of the project components of the PBCT will cross an active fault, although the closest fault passes near Arroyo del Oso and the project site is approximately 10 miles northwest from the epicenter of the San Simeon Earthquake of 2003.

Conclusion: No impact.

a.ii) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project will comply with all Code requirements and adhere to the State Fire Marshall review process, which will ensure trail features such as bridges and boardwalks will be constructed to minimize risk from seismic ground shaking in the event of an earthquake. In order to ensure the integrity of the trail features in the event of a large earthquake, after a large earthquake event (i.e., magnitude 5.0 or greater within 50 miles of the project site), a qualified professional chosen by DPR will inspect all project structures and features for damage, as soon as is possible after the event. If any structures or features have been damaged, they will be closed to park visitors, volunteers, residents, contractors, and staff.

Conclusion: Less than significant impact.

a.iii) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

The proposed project would involve the construction of the PBCT and associated infrastructure. The PBCT will include bridges and boardwalks north and south of the Piedras Blancas Motel site and in some locations will be constructed adjacent to the existing bluff top. A significant seismic event could cause one or more bridges to fail or cause the bluff top to collapse. Compliance with relevant provisions of the California Building Code will ensure new construction is designed to resist seismic shaking.

Liquefaction refers to the loss of soil strength due to seismic forces acting on water-saturated granular soils. This can lead to a “quicksand” condition, which causes many types of ground failure. Liquefaction typically occurs in areas underlain by soils containing unconsolidated, saturated, clay-free sands and silts. Based on the consistency of the in-

situ soils, and mapping prepared for the San Luis Obispo County Safety Element, the proposed project sites have a low probability of liquefaction.

However, areas between Highway 1 and the mouth of the several ephemeral creeks that cross the project areas have a *Very High* potential for liquefaction, based on mapping prepared by San Luis Obispo County. Pedestrian bridge abutments placed on soils susceptible to liquefaction could be subject to soils instability in the event of an earthquake, putting the bridge at risk. Compliance with relevant provisions of the California Building Code will ensure new construction is designed to resist liquefaction.

Conclusion: Less than signficant impact.

a.iv) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Based on the project description, the PBCT project is not located in areas subject to landslide risk. The risk of shoreline erosion, sea cliff retreat and bluff failure are discussed below under item c.).

Conclusion: No impact.

b) Would the Project result in substantial soil erosion or the loss of topsoil?

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.

The rate at which erosion occurs is largely a function of climate, soil cover, slope conditions, and inherent soil properties such as texture and structure. According to the Natural Resource Conservation Service (NRCS), soils in the PBCT project area have a low to moderate susceptibility for erosion.

Compliance with the California Building Code ensures the adequate design and construction of building foundations to resist soil movement. In addition, the CBC also contains drainage requirements to control surface drainage and reduce seasonal fluctuations in soil moisture content which minimize erosion.

Construction activities involving clearing, grading, or excavation that causes soil disturbance on one or more acres will be subject to coverage under the State's National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit. The DPR is required to prepare and comply with a Storm Water Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMPs) to avoid soil erosion and associated pollution of waterways and is also required to report any water pollution and remediate the pollution occurrence.

Conclusion: Implementation of standard project requirements GEO-2 & 3 as outlined below, as well as compliance with the CBC and NPDES will ensure potential impacts associated with erosion are reduced to a less than significant level.

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.

c) Would the Project be located on a geologic unit or soil that is unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The project site is located along a coastal terrace between the realigned Highway 1 corridor and a bluff top overlooking the Pacific Ocean. Sea level rise associated with climate change is expected to increase coastal erosion and flooding hazards along the California Coast. A bluff erosion, wave run-up and site flooding/tsunami assessment was prepared for the Piedras Blancas Motel site in 2015 (Geosolutions 2015).

Limited portions of the PBCT will be constructed along the bluff top and will be subject to the effects of sea cliff retreat over the next 100 years. While the loss of a few portions of the PBCT as the cliff erodes is considered adverse, it will be a temporary impact until the trail is re-constructed. The majority of the PBCT will be located at 78-foot (75-year) setbacks. However, all the bridges and boardwalk crossings will be located close to Caltrans right-of-way with an expected 100-year lifespan.

Conclusion: Less than significant impact.

d) Would the Project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?

According to the NRCS, soils underlying the PBCT project area (Concepcion loam, 2 to 5 percent slope) are considered to be somewhat expansive. Compliance with the relevant provisions of the CBC will address soil conditions on the project site.

Conclusion: No impact.

e) Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No wastewater systems will occur for this project.

Conclusion: No impact.

f) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?

The paleontological resources and unique geological features survey was negative. No sensitive paleontological resources and unique geological features are known to exist within the project area nor were any identified during the field survey. Ground disturbance for the current project will be restricted to shallow depths and will not impact any sensitive geologic features. Therefore, no impacts to paleontological resources or unique geologic features are expected to occur.

Conclusion: No impact.

STANDARD PROJECT REQUIREMENTS

GEO-1

- Maintaining Structural Integrity. After a large earthquake event (i.e., magnitude 5.0 or greater within 50 miles of the project site), a qualified professional chosen by DPR will inspect all project structures and features for damage, as soon as is possible after the event. If any structures or features have been damaged, they will be closed to park visitors, volunteers, residents, contractors, and staff.

GEO-2

- Erosion Control and SWPPP: A stormwater pollution prevention plan (SWPPP) will be required for the project and appropriate BMPs will be required to prevent erosion from all applicable areas.

GEO-3

- All earthwork and subgrade work will be compacted and revegetated per DPR trail policy and to prevent erosion of disturbed areas.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

VIII. GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL AND REGULATORY SETTING

The project site is located in rural San Luis Obispo County, under the jurisdiction of the San Luis Obispo Air Pollution Control District (SLOAPCD) and United States Environmental Protection Agency (USEPA) Region IX. San Luis Obispo County falls under the regional jurisdiction of the SLOAPCD. The main purpose of the SLOAPCD is to enforce local, state, and federal air quality laws and regulations. Their primary responsibility is controlling air pollution from stationary sources.

California is the fifteenth largest emitter of greenhouse gases (GHGs) in the world, representing about two percent of worldwide emissions. In an effort to help curb global warming, the state enacted new laws in 2006 regulating GHGs. Assembly Bill 32, the Global Warming Solutions Act, required the State to implement a series of actions to achieve a reduction in GHG emissions to 1990 levels by 2020 (California Air Pollution Control Officers Association, 2008). California's climate policy is framed by three greenhouse gas (GHG) emission reduction targets: to 1990 levels by 2020, to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. The California Air Resources Board updated these goals in 2022, aiming to cut greenhouse gas emissions by 85% below 1990 levels by 2045, as well as 48% reduction by 2030.

In December 2009, the Natural Resource Agency adopted amendments to the guidelines for Implementation of CEQA addressing the significance of impacts for greenhouse gas emissions (California Natural Resources Agency, 2009). Section 15064.4 of the amended CEQA Guidelines states: "A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project."

DPR has developed a "Cool Parks" initiative to address climate change within the State Park system. Cool Parks proposes that CSP itself as well as resources under its care adapt to the environmental changes resulting from climate change. In order to fulfill the Cool Parks initiative, CSP is dedicated to using alternative energy sources, electric vehicles (EV's), a natural gas fueled bus fleet, low emission vehicles, recycling and reusing supplies and materials, and educating staff and visitors on climate change (California Department of Parks and Recreation, pp. https://www.parks.ca.gov/?page_id=24872#:~:text=What's%20"Cool%20Parks"%3F,of%20the%20State%20Park %20System.)

The California Natural Resources Agency has developed the Safeguarding California Plan, most recently updated in 2018. This document is a catalog of ongoing actions and recommendations that protect infrastructure, communities, services and the natural environment from climate change. The Plan is intended to serve as a guide for State government while holding agencies accountable. The Plan indicates that temperature

increase resulting from climate change is likely to shift tourism patterns toward higher latitudes and altitudes and to cooler regions.

Trees and woodlands play an important role in the removal of carbon dioxide from the atmosphere. Through the biochemical process of photosynthesis, carbon dioxide is taken in by trees and stored as carbon in the trunk, branches, leaves, and roots. Carbon is also stored in the soil and indeed this is a major sink for carbon in the forest. Decay of the organic material eventually releases the CO_2 back to the atmosphere, and providing the forests are sustainably managed, it is taken up by replacement trees, thereby maintaining a balance in the carbon budget.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

DISCUSSION

This Initial Study considers to what degree, if any, the Proposed Project would (a) generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment, or (b) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

a) In 2002 the California legislature declared that global climate change was a matter of increasing concern for the state's public health and environment, and enacted laws requiring the state Air Resources Board (ARB) to control GHG emissions from motor vehicles (Health & Safety Code §32018.5 et seq.). CEQA Guidelines define greenhouse gases to include carbon dioxide (CO2), nitrous oxide (N2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The California Global Warming Solutions Act of 2006 (Assembly Bill 32) definitively established the state's climate change policy and set GHG reduction targets (Health & Safety Code §38500 et seq.). The State set its target at reducing greenhouse gases to 40 percent below 1990 levels by 2030. The California Air Resources Board updated these goals in

2022, aiming to cut greenhouse gas emissions by 85% below 1990 levels by 2045, as well as 48% reduction by 2030.

According to Recommendations by the Association of Environmental Professionals on How to Analyze GHG Emissions and Global Climate change in CEQA Documents (March 5, 2007), an individual project does not generate enough GHG emissions to significantly influence global climate change. Rather, global climate change is a cumulative impact.

This means that a project may participate in a potential impact through its incremental contribution combined with the contributions of all other sources of GHG. In assessing cumulative impacts, it must be determined if a project's incremental effect is "cumulatively considerable." (CEQA Guidelines §15064(i)(1) and §15130).

In 2011 the CEQA Guidelines, Section 15064.4 Appendix D was modified to include thresholds of significance for Greenhouse Gases. The project would have potential significant impacts if the project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Due to the nature of the proposed project, DPR has determined that it is appropriate to assess potential GHG impacts qualitatively – as allowed by CEQA Guidelines §15064.4(a)2.

The proposed project could produce GHGs during fuel combustion. Project vehicle and light equipment is expected to consist of passenger vehicles and small gas-powered tools. A crane or helicopter could be used to place bridge segments, depending on the final design.

Not all vehicles and equipment would operate simultaneously. Some equipment would only be operating during certain stages of the project depending on the nature of the work. The project preparation and construction-related greenhouse gas emissions would be short-term, estimated at approximately 150 days spread out over several phases of construction. Therefore, the project construction phase would not significantly increase greenhouse emissions.

GHGs would also be produced by staff accessing the facilities by vehicle. Standard Project Requirement AIR 1 – Air Quality as noted in Section III above, requires all construction related equipment engines to be maintained and properly tuned up (according to manufacturer's specifications), and in compliance with all state and federal

requirements. This requirement is designed to reduce project-related emissions of CO_2 and N_2O.

The SLOAPCD has adopted GHG thresholds to determine significance, as follows:

GHGs (CO_2, CH_4, N20, HFC, CFC, F6S) from all projects subject to CEQA must be quantified and mitigated to the extent feasible. The thresholds of significance for a project's amortized construction plus operational-related GHG emissions are:

For land use development projects, the threshold is compliance with a qualified GHG Reduction Strategy (see Section 3.3); OR annual emissions less than 1,150 metric tons per year (MT/yr) of CO_2e; ORr 4.9 MT CO_2e/service population (SP)/yr (residents + employees2). Land use development projects include residential, commercial and public land uses and facilities. Lead agencies may use any of the three options above to determine the significance of a project's GHG emission impact to a level of certainty.

The Massachusetts Institute of Technology estimated that, *"Depending on size, materials, and how those materials are sourced, constructing a new house likely emits on the order of 15 to 100 tons of CO_2. That's a lot, but only a fraction as much as an inefficient house might emit over its lifetime."* Given that this project will use prefabricated bridges and the limited reliance for trail/boardwalk construction on power equipment, the GHG emissions are likely on the low end. Using the MIT numbers as a guide, the cumulative GHG emissions of this project fall well below the threshold of significance.

The Association of Environmental Professionals' document, *Alternative Approaches to Analyzing Greenhouse Gas Emissions and Global Climate Change in CEQA Documents,* states that emissions for criteria pollutants tend to follow similar patterns as the emissions for GHG emissions" (Michael Hendrix and Cori Wilson, 2007). Therefore, it is reasonable to assume that if all other pollutants from the project are determined to be less than significant, the CO_2 emissions will also be less than significant. The proposed project would not violate San Luis Obispo County's air quality standards and would not result in a cumulatively considerable increase in emissions. Therefore, the proposed project would not generate significant GHG emissions and would therefore not conflict with the current State and Alpine County guidelines or any applicable plans, policies or regulations concerning GHG emissions. No impact.

Table GHG-1. SLO APCD Greenhouse Gas Emissions Thresholds of Significance

GHG Emission Source Category	Operational Emissions
Residential and Commercial Projects	Compliance with Qualified GHG Reduction Strategy OR Bright-Line Threshold of 1,150 MT CO_2e/yr OR Efficiency Threshold of 4.9 MT CO_2e/SP*/yr
(Industrial) Stationary Sources	10,000 MT of CO_2e/yr.

APCD determined that a tiered process for residential / commercial land use projects was the most appropriate and effective approach for assessing the GHG emission impacts. The tiered approach includes three methods, any of which can be used for any given project:

- Qualitative GHG Reduction Strategies (e.g. Climate Action Plans): A qualitative threshold that is consistent with AB 32 Scoping Plan measures and goals; or,
- Bright-Line Threshold: Numerical value to determine the significance of a project's annual GHG emissions; or,
- Efficiency-Based Threshold: Assesses the GHG impacts of a project on an emissions per capita basis.

For most projects the Bright-Line Threshold of 1,150 Metric Tons CO2/year (MT CO2e/yr.) will be the most applicable threshold. In addition to the residential/commercial threshold options proposed above, a bright-line numerical value threshold of 10,000 MT CO2e/yr. was adopted for stationary source (industrial) projects.

The Handbook, Table 1-1, provides screening criteria based on the floor area of projects that would normally exceed the operational thresholds of significance for greenhouse gases. Table GHG-1 provides a comparison of project characteristics with similar land uses from Table 1-1. As shown in Table GHG-2, the project size is well below the project size that would normally generate emissions that exceed the thresholds for greenhouse gases.

Table GHG-2. Comparison of Project Components with APCD Screening Thresholds for Greenhouse Gas Emissions

APCD CEQA Air Quality Handbook Land Use Category	Size of Urban/(Rural) Project Expected to Exceed the APCD GHG Significance Threshold	Project Size
City Park	103 acres	
Coastal Trails	None	9.5 acres

Source: San Luis Obispo County APCD 2012 CEQA Air Quality Handbook, with administrative updates 2017, 2021/2022, and 2023, Table 1.1, accessed 4/29/24 at slocleanair.org/rules-regulations/land-use-ceqa/ceqahandbook.php.

It should be noted that projects that generate less than the above-mentioned thresholds will also participate in emission reductions because air emissions, including GHGs, are under the purview of the California Air Resources Board (or other regulatory agencies) and will be "regulated" either by CARB, the Federal Government, or other entities. For example, new vehicles will be subject to increased fuel economy standards and emission reductions, large and small appliances will be subject to more strict emissions standards, and energy delivered to consumers will increasingly come from renewable sources.

Other programs that are intended to reduce the overall GHG emissions include Low Carbon Fuel Standards, Renewable Portfolio standards and the Clean Car standards. As a result, even the emissions that result from projects that produce fewer emissions than the threshold will be subject to emission reductions.

Under CEQA, an individual project's GHG emissions will generally not result in direct significant impacts. This is because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation.

San Luis Obispo County General Plan. Development on private land surrounding the CPER is subject to the policies and standards of the San Luis Obispo County General Plan. The General Plan sets forth policies and implementation measures to guide land use decisions within the unincorporated county, including the Carrizo Plain. Policies and standards relating to the protection of air quality and greenhouse gas emissions are provided in the Land Use, Conservation and Open Space and Circulation Elements.

San Luis Obispo County adopted a greenhouse gas (GHG) inventory in 2010 as part an update of the Conservation and Open Space Elements of the General Plan. The inventory was prepared in 2009 using data from 2006 because of the availability of newer, more reliable data for that year. In 2011, the inventory was updated because of the availability of more refined data for the baseline year of 2006. For purposes of this discussion, the year 2006 will be used when referring to the County's baseline GHG inventory. The GHG inventory quantified all GHG emissions and sinks within the county and concluded that, in 2006, activities within the unincorporated county emitted about 917,710 metric tons of carbon dioxide equivalent ($MTCO_2e$)[1] into the atmosphere. The methodologies and assumptions used to prepare the inventory are provided in Chapter 3 of the County's climate action plan (see EnergyWise Plan, discussed below).

San Luis Obispo County Climate Action Plan (EnergyWise Plan). In 2011 San Luis Obispo County adopted the EnergyWise Plan (Section 5.3.6.1) to implement policies and

[1] Carbon dioxide equivalent is a metric used to compare the emissions from various greenhouse gases based upon their global warming potential (GWP) and is a way to equalize the different GWPs of the six internationally recognized greenhouse gases. For instance, methane (CH4) has 21 times the GWP of carbon dioxide (CO2), therefore 21 metric tons CO2e could be 21 metric tons of carbon dioxide or 1 metric ton of methane.

programs contained in the County's General Plan Conservation and Open Space Element (COSE) aimed at meeting the reduction targets for greenhouse gas emissions and energy use prescribed by State law. The EnergyWise Plan builds upon the goals and strategies of the COSE to reduce local GHG emissions. It identifies how the County will achieve the GHG emissions reduction target of 15% below baseline levels by the year 2020 in addition to other energy efficiency, water conservation, and air quality goals identified in the COSE. The EnergyWise Plan will also assist the County's participation in the regional effort to implement land use and transportation measures to reduce regional greenhouse gas emissions from the transportation sector by 2035.

c) *Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Based on the size of the project, and the GHG threshold information described in Table 22 of the Setting section, the project is expected to generate GHG less than the Bright-Line Threshold of 1,150 metric tons. This is based on the nearest applicable comparison, which is a City Park. A City Park of 103 acres would be expected to exceed the Bight-Line Threshold. Since this project is only 9.5 acres, the Bright-Line Threshold can not reasonably be expected to exceed the Bright-Line Threshold. Therefore, the project's potential direct and cumulative GHG emissions are found to be less significant and to result in a less than cumulatively considerable contribution to GHG emissions. Section 15064(h)(2) of the CEQA Guidelines provide guidance on how to evaluate cumulative impacts. If it is shown that an incremental contribution to a cumulative impact, such as global climate change, is not 'cumulatively considerable', no mitigation is required. Because this project's emissions fall under the threshold, no mitigation is required.

Conclusion: Less than significant.

b) *Would the Project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

As discussed in the Setting, San Luis Obispo County has adopted a plan for achieving the GHG reduction targets set forth by AB 32 and Executive Order S-01-07 (the 2011 EnergyWise Plan). If the PBCT Project is not consistent with these reduction targets, it would be considered to have a project-specific and cumulatively considerable significant impact on climate change.

With regard to the effects of climate change on the PBCT Project, it should be noted that a certain level of environmental change is inevitable due to current GHG emissions and unavoidable future increases in GHG emissions worldwide. Thus, for purposes of this MND, construction of the PBCT project would result in a cumulatively-considerable contribution to a significant impact if DPR does not respond to reasonably foreseeable environmental changes that may occur due to climate change, and thus subject PBCT to additional risk of physical harm related to flooding, sea level rise, wave runup, wildfire risk and other impacts.

The EnergyWise Plan builds upon the goals and strategies recommended in the County's COSE to reduce local GHG emissions. The Plan identifies how San Luis Obispo County will achieve the GHG emissions reduction target of 15% below baseline levels by the year 2020 in addition to other energy efficiency, water conservation, and air quality goals identified in the COSE. The EnergyWise Plan will also assist the County's participation in the regional effort to implement land use and transportation measures to reduce regional greenhouse gas emissions from the transportation sector by 2035.

Construction of the PBCT will require the use of motorized machinery and potentially a helicopter or crane for bridge segments. Following construction, PBCT is expected to generate some motor vehicle trips which will generate greenhouse gases. While this project is somewhat unit, analysis demonstrates consistency with relevant aspects of the PBCT Project with applicable provisions of the County's Energy Wise Plan.

Conclusion: Less than significant.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

IX. HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL SETTING

The project sites are located in rural San Luis Obispo County. HSSSP is a 1,696-acre park located in San Luis Obispo County. Before the transfer of the Piedras Blancas motel parcel to DPR, a Phase 1 Environmental Report was written and its recommendations, which included closing an underground gasoline tank, by cleaning, filling, and capping it, as well as asbestos abatement. These recommendations were implemented. No substantial amount of hazardous materials is stored within the park facilities.

Hazardous Materials

The California Department of Environmental Protection (CAL EPA) has the responsibility for compiling (pursuant to Government Code §65962.5) information on hazardous materials sites in California that together are known as the "Cortese list." The Cortese List Data Resources shows no Department of Substances Control Sites close to the proposed project site. The closest known site within SLO Coast District is at Montaña de Oro at the (former) Baywood Park Training Area, approximately 22 miles from the proposed project site. The closest known Cease and Desist Order or Cleanup and Abatement Order site is approximately 9 miles from the southernmost section of the PBCT. No leaking underground storage tanks or solid waste disposal sites are close to the project site, nor are there any hazardous waste facilities identified in HSC § 25187.5 within SLO Coast District or San Luis Obispo County (California Environmental Protection Agency, Cortese List Data Resources, 2023).

Airports

The Hearst Corporation maintains a private airstrip on the nearby Hearst Ranch but no public airstrips exist within the park or adjacent to park property. The nearest public use airport is located in Paso Robles, the Paso Robles Municipal Airport, approximately 48miles from the Project site.

Schools

The Project is within the Coast Unified School District and the San Luis Obispo Joint Community College District. The closest schools are located in Cambria and other small rural communities, though none are within one-quarter mile of the park's boundary.

Wildland Fire

The fire hazard severity zone is moderate, and the emergency response time is between 5-10 minutes south of and up to Piedras Blancas and 10-15 minutes north of Piedras Blancas (County of San Luis Obispo, Department of Planning and Development 2024).

The nearest station serving the park is located in Cambria, approximately 12 miles from the southernmost end of the Project site.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, substances, or waste into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites, compiled pursuant to Government Code §65962.5, and, as a result, create a significant hazard to the public or environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death from wildland fires?	☐	☐	☒	☐

DISCUSSION

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction activities will involve the temporary use and storage of fuels, solvents and paint on the project site. Operation of the project could involve the use of household hazardous materials such as cleaners, solvents and pesticides. However, the Project will not create a hazard to the public due to routine use of hazardous materials as these are already used routinely in the course of the operation of HSSSP. The District already maintains a spill prevention plan and with implementation of Project Specific Requirement HAZ - 1 Hazardous Materials, impacts from the project remain less than significant.

Conclusion: Less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, substances, or waste into the environment?

Project construction would require the use of equipment and vehicles that use gasoline, oil, and hydraulic fluid. Hazardous materials used during construction would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials. Operation of the PBCT will not involve the use or storage of hazardous materials of a quantity that would pose a significant risk to patrons of the project or to persons travelling on Highway 1.

Conclusion: Less than signficant impact.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No existing or proposed schools are located within one-quarter mile of the Project site, and the Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes.

Conclusion: No impact.

d) Would the project be located on a site which is included on a list of hazardous materials sites, compiled pursuant to Government Code §65962.5, and, as a result, create a significant hazard to the public or environment?

The proposed project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code 65962.5. As discussed above under item a.), above, the underground gasoline storage tank on the Piedras Blancas hotel site has been closed, cleaned, filled, and capped in accordance with the Phase 1 Environmental Report recommendations.

Conclusion: No impact.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

HSSSP is not located within an airport land use plan or within two miles of a public airport, or public use airport.

Conclusion: No impact.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The PBCT Project does not involve the development of structures that could potentially impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The project involves the construction of a portion of the California Coastal Trail. The entire project parallels Highway 1 which has been approved for realignment landward to address wave erosion.

All construction activities associated with the Project would occur within the boundaries of HSSSP (with minimal encroachment on Caltrans right-of- way) and work would not restrict access to, or block any, public road outside the immediate construction area. Minimum access requirements for emergency vehicles would be maintained at all times.

Conclusion: Less than significant impact.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death from wildland fires?

The PBCT Project is located in a region where wildfires can be a concern. Unnatural fire ignitions associated with human activities, particularly along Highway 1 and other roads, may pose a threat to public safety and property at the PBCT site. Due to the threat to

lives and property, fire protection agencies responsible for land within the HSSSP will continue to actively suppress wildfires.

The use of motorized mechanical equipment for construction and maintenance activities could result in an increased risk of human-caused wildfire ignitions. The area surrounding HSSSP poses a moderate risk to wildfire, as mapped by CalFire (Figure FIRE-1 in Wildfire Section). During extreme weather conditions a grass fire originating on HSSSP could spread out of control and pose a risk to life and property on surrounding properties. Standard project requirement Haz-2 will require the preparation of a Fire Safety Plan that will be subject to District approval to ensure the protection of life and property. Implementation of standard project requirements will ensure the risk to life and property associated with wildland fires is less than significant.

STANDARD PROJECT REQUIREMENTS

HAZ-1: Hazardous Material Management

- Prior to the start of on-site construction activities, Contractor will prepare a Spill Prevention and Response Plan as part of the Storm Water Pollution Prevention Plan (SWPPP) for RWQCB approval to provide protection to on-site workers, the public, and the environment from accidental leaks or spills of vehicle fluids or other potential contaminants. This plan will include (but not be limited to);

    - a map that delineates construction staging areas, where refueling, lubrication, and maintenance of equipment will occur;
    - a list of items required in a spill kit on-site that will be maintained throughout the life of the project;
    - procedures for the proper storage, use, and disposal of any solvents or other chemicals used in the restoration process;
    - and identification of lawfully permitted or authorized disposal destinations outside of the project site.

- Prior to the start of on-site construction activities, Contractor will clean and repair (other than emergency repairs) all equipment outside the project site boundaries.

- Contractor will designate and/or locate staging and stockpile areas within the existing maintenance yard area or existing roads and campsites to prevent leakage of oil, hydraulic fluids, etc. into the ephemeral creeks, associated wetlands and riparian communities.

- Prior to the start of on-site construction activities, Contractor will inspect all equipment for leaks and regularly inspect thereafter until equipment is removed from the project site. All contaminated water, sludge, spill residue, or other hazardous compounds will be contained and disposed of outside the boundaries of the site, at a lawfully permitted or authorized destination.

HAZ-2: Fire Safety Plan

Prior to the start of construction, Contractor will develop a Fire Safety Plan for District approval. The plan will include the emergency calling procedures for both the California Department of Forestry and Fire Protection (CDF) and local fire department(s).

PROJECT SPECIFIC REQUIREMENTS

None Required.

MITIGATION MEASURES

None required.

X. HYDROLOGY AND WATER QUALITY

This Section evaluates potential impacts related to hydrology and water quality from both construction and operation of the new facilities, as measured against significance thresholds derived from applicable local, state, or federal policies, or from Appendix G of the CEQA Guidelines.

ENVIRONMENTAL SETTING

For the environmental setting of the PBCT, desktop literature review has been conducted using queries with the California Department of Water Resources (CDWR) and County of San Luis Obispo.

The project is located within the Central Coast hydrologic region which, as defined by CDWR covers about 11,300 square miles and includes all of Santa Cruz, Monterey, San Luis Obispo, and Santa Barbara counties, most of San Benito County, and portions of San Mateo, Santa Clara, and Ventura counties. Significant geographic features include the Pajaro, Salinas, Carmel, Santa Maria, Santa Ynez, and Cuyama valleys, the coastal plain of Santa Barbara, and the Coast Ranges. Major river drainages include the Salinas, Cuyama, Santa Ynez, Santa Maria, San Antonio, San Lorenzo, San Benito, Pajaro, Nacimiento, Carmel, and Big Sur rivers. The topography, geology, hydrology, and land use are highly variable in the region (CDWR, 2015).

The climate in the region is generally classified as Mediterranean. Annual precipitation amounts, which mostly fall as rain in the region, vary based on location. The northern coastal portion of the region receives an average of approximately 31.5 inches of rain, while the southern coastal portion of the region receives 18.25 inches. The central interior portion receives as little as 15 inches per year. Annual runoff volumes, based on data for the Pajaro, Salinas, Santa Maria, and Santa Ynez rivers, average approximately 54,000 acre-feet. Approximately 86 percent of the annual water supply for agricultural and urban use in the region is provided from groundwater.

Climate and Precipitation

The Project sites have a moderate climate with hot, dry summers and cool, wet winters. The source of surface water runoff and groundwater is from precipitation, which comes mostly as rain between October and May. Average annual rainfall ranges from 20 to 30 inches. Winter snow is unusual but does occur at the higher elevations in the region, usually above 2,000 feet.

Watersheds

Project sites contain portions of the San Simeon – Arroyo de la Cruz subwatershed. The San Simeon-Arroyo de la Cruz area watershed is located within the North Coast region of San Luis Obispo County. This watershed drains approximately 51,500 acres and

originates on the western slopes of the Santa Lucia Mountains, flowing to the Pacific Ocean at San Simeon State Beach. Although smaller creeks within this watershed grouping have direct drainages to the ocean, there are two major drainages – Arroyo de la Cruz and San Simeon Creek. Recharge of the aquifer comes from percolation of stream flow, deep percolation of precipitation, and irrigation return flows. San Simeon Creek headwaters occur in the Coast Ranges to the northeast of Cambria. Elevations in the watershed range from 3,559 feet above sea level in the Santa Lucia Range at the eastern most watershed boundary to sea level along the coast. The dominant land use throughout the watershed is agriculture, specifically rangeland (County of San Luis Obispo).

Surface Water

Most of the mainstem creeks and rivers within or flowing through the subwatershed, flow all year round fed by springs and groundwater. Some headwater creeks and reaches of many of the mainstem creeks will have intermittent flow during the drier years. Winter flows are punctuated by steep rising and long recessional storms that usually build upon each other to raise the winter baseflow throughout the rainy season. Baseflows drop throughout the summer months tapering off until the fall rains provide surface flow and recharge the shallow groundwater table.

Groundwater

Groundwater resources in the Central Coast region are primarily supplied by alluvial aquifers with few fractured-rock aquifers. Alluvial aquifers are comprised of sand and gravel or finer grained sediments, with groundwater stored in the voids, or pore space, between the alluvial sediments.

Fractured-rock aquifers consist of impermeable granitic, metamorphic, volcanic, or hard sedimentary rocks, with groundwater being stored in cracks, fractures, or other void spaces. The distribution and extent of alluvial and fractured-rock aquifers and water wells vary within the Central Coast region. For the project sites, groundwater basins include Arroyo de la Cruz Valley, Piedras Blancas Point, San Simeon Point, San Simeon Valley, Santa Rosa Valley (County of San Luis Obispo). These basins are coastal basins with drainage to the ocean.

Groundwater increases when fall, winter, and early spring storm events provide precipitation and/or snowmelt and recedes the rest of the year. There is a long recessional drawdown following the streamflow at the end of the rainy season until the rains begin again. Current USGS stream gauges are located at Arroyo de la Cruz near Highway 1 and at Lower San Simeon Creek. Base flow at San Simeon Creek is measured at 1200 acre-feet per year (AFY) with a peak flow of 45,380 AFY (SLO County Flood Control and Water Conservation District, 2005).

Flooding

The Federal Emergency Management Agency (FEMA) is responsible for mapping flood zones. The Flood Insurance Rate Map for the proposed PBCT Project site is located near a Flood Zone A but does not fall directly within the flood zone. Zone A is considered a Special Flood Hazard Area, considered to be subject to inundation by the 1% chance of flood. Within Zone A, no base flood elevations have been determined.

REGULATORY SETTING

The following section includes the regulatory framework surrounding hydrology and water quality as part of the Project and impact analysis. Information regarding the regulatory setting for hydrology and water quality was compiled by using federal and state laws and statutes on the protection of water resources.

The project site is located in San Luis Obispo County and lie within the jurisdiction of the Central Coast RWQCB. Per the requirements of the Clean Water Act (CWA), and the California Porter-Cologne Act the regional board has prepared a Water Quality Control Plan (Basin Plan) for the watersheds under its jurisdiction. The Basin Plan is comprehensive in scope. It contains a brief description of the Central Coast Region and describes its water quality and quantity problems and the present and potential beneficial uses of the surface and ground waters within the Region. It also includes programs of implementation to achieve water quality objectives. Per the requirements of CWA Section 303(c), the Basin Plan is reviewed every three years and revised as necessary to address problems with the plan and meet new legislative requirements. The latest one prepared was in 2018 (NCRWCB 2018).

FEDERAL REGULATIONS

Clean Water Act

The Clean Water Act of 1972 (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The CWA makes it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit is obtained.

Section 401

Under Section 401 of the Clean Water Act (CWA), a federal agency may not issue a permit or license to conduct any activity that may result in any discharge into waters of the United States unless a Section 401 water quality certification is issued, or certification is waived. States and authorized tribes where the discharge would originate are generally responsible for issuing water quality certifications.

Section 404

Section 404 of the CWA establishes a program to regulate the discharge of dredged and fill material into waters of the United States, including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States unless the activity is exempt from Section 404 regulation.

STATE REGULATIONS

Porter-Cologne Act

The Porter Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code section 13000 et seq.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected,
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason, and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

Fish and Game Code - Section 1602

Section 1602 of the California Fish and Game code requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake.

IMPACT ANALYSIS

The following impact analysis contains each specific impact and corresponding mitigation measure as they relate to the defined thresholds of significance for hydrology and water quality.

For the environmental impact analysis of the Project, both direct and indirect impacts to hydrology or water quality from construction and operational activities are considered. These impacts include the potential for the Project to degrade water quality, interfere with

groundwater recharge, alter drainage patterns, increase run-off or erosion, or release pollutants.

Thresholds of Significance and Determinations of Impacts

Would the project:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv. impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

DISCUSSION

a) Would the Project any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction of the PBCT Project will include impermeable surfaces which will increase the volume and velocity of runoff generated from the project site. In addition, the PBCT will include the construction of pedestrian bridges and raised walkways. Temporary construction activities (such as site grading) may result in soil erosion that could degrade water quality.

All activities undertaken by the proposed Project will adhere to state and federal policy on water quality standards and discharge requirements. Construction-related erosion and sediment disturbance will be addressed with conformance to, and implementation of standard erosion, sediment control, and pollution prevention requirements. It is the policy of the Department to adopt a comprehensive, integrative, and cooperative watershed approach to managing watersheds as complete hydrologic systems, and to minimize human disturbance to the natural upland processes that deliver water, sediment, nutrients, and natural debris to streams.

For the proposed PBCT, construction would be completed with hand tools and small motorized equipment. Bridge construction would be located outside of creek corridors in order to minimize wetland and water quality impacts.

Project construction could result in erosion to nearby creeks, drainages, and/or the Pacific Ocean. However, the project incorporates an erosion control plan. Implementation of the measures recommended by the erosion control plan will ensure compliance with county and State erosion control and water quality protection regulations. Such measures include restoration of stream channel areas with engineered streambed material, distributing straw and seed, and use of blankets and coil rolls over disturbed areas when precipitation is anticipated.

The project would incorporate a number of design elements to reduce impacts to water resources and control discharge. Helicoils will be used for raised boardwalks, boardwalks will be raised to allow water sheet flow and reduce impacts. Also, a Storm Water Pollution Prevention Plan will be obtained and the conditions of that permit will be followed.

Conclusion: Less than significant. Compliance with relevant State and local codes as well as standard project requirements HYDRO 1, HYDRO 2, and site specific BMPs are anticipated to minimize these effects to the extent feasible.

b) Would the Project Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The project will not entail groundwater use and will not impede groundwater in the local basin.

Conclusion: No Impact

c) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Impacts to creeks would result from bridge installation, while the trail system will alter drainage patterns. These impacts have been largely avoided by design elements that facilitate sheet flow thereby constructed to prevent erosion.

Runoff currently percolates into the ground at the site or sheet flows toward the ocean. The PBCT would result in only minor alterations to the Project site. The Project incorporates a drainage plan designed to collect and convey runoff to points of disposal in a volume and velocity that avoids flooding and other adverse impacts to existing drainages.

Conclusion: No Impact.

d) Would the project be located In flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation?

The PBCT Project includes the construction of 5 bridges to span the creek corridors and other areas. The bridges will be designed and constructed to allow a 100 year storm to pass underneath; bridge abutments will be placed outside the 100 year floodplain. The Project would not result in substantial erosion or siltation on- or off-site.

Based on a floodplain analysis prepared by Caltrans for the Highway 1 Realignment Project, the PBCT site is not located in a 100-year floodplain. Portions of the PBCT project will cross portions of the floodplains of the coastal creeks which are subject to inundation during a 100-year flood. As discussed under items b.) above, the bridges will be designed to allow a 100-year flood to pass beneath; the bridge abutments will be located outside the 100-year floodplain.

The Project does not include a body of water that is large enough to be subject to a seiche, and does not include features that could influence, restrict, or enhance natural mudflow processes. However, the project site is located adjacent to the Pacific Ocean where it may be subject to a tsunami. A tsunami is a series of traveling ocean waves of extremely long length generated primarily by vertical movement on a fault (earthquake) occurring along the ocean floor. As a tsunami reaches the shallow waters of the coast, the waves

slow down and the water can pile up into a wall 30 feet or more in height. The effect can be amplified where a bay, harbor or lagoon funnels the wave as it moves inland. Large tsunamis have been known to rise over 100 feet. Even a tsunami one to three feet in height can be destructive, resulting in deaths and injuries, especially within port and harbor facilities.

A bluff erosion, wave run-up and site flooding/tsunami assessment prepared for the Piedras Blancas hotel site in 2015 (Earth Systems, 2015, Attachment C makes the following conclusions:

- The bluff retreat analysis indicated that the bluff at the site has been retreating at a rate of 4.7 inches to 10.9 inches a year for a period of 58 years (1957-2015). In determining the building bluff top setback, we have used the upper limit of 10.9 inches per year. Therefore, for a 75-year period with a retreat rate of 10.9 inches per year, the bluff is expected to retreat approximately 68 feet. The CCC requires that an additional 10 feet be added to this estimated retreat distance, which results in a total building setback distance of 78 feet.

- The 100-year wave run-up analysis indicates that during a 100-year storm event, the highest elevation that a sea wave run-up would reach along the beach inlet area and the mouth of Arroyo Del Corral Creek would be elevation 17.7 feet (NAVD 88 datum). Based on the site topography map by Dakos Land Surveys (June 2015), the Piedras Blancas hotel facilities lie on the upper part of the marine terrace platform where the elevations are over 30 feet. Based on the results of the wave run-up analysis under “worst case scenario” conditions, the possibility of sea wave run-up reaching the Piedras Blancas hotel area during their anticipated 100-year design life is remote.

- Based upon available historical data regarding tsunami inundation due to near-source and distant-source causative earthquakes, it is unlikely that a tsunami-generated tidal surge would reach the Piedras Blancas hotel area that lies at an elevation of over 30 feet above mean sea level.

The preliminary design of the PBCT incorporates the recommended 78-foot setback from the existing bluff face. Therefore, potential impacts resulting from flooding, tsunamis, or seiches are considered less than significant.

Conclusion: Less than significant.

e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The San Luis Obispo County Groundwater Sustainability Agency is responsible for adopting and implementing Groundwater Sustainability Plans. Regardless, the Project would not obstruct the Agency’s future implementation of a groundwater management

plan because the project includes no work that would affect the groundwater basin where the Project is located.

Conclusion: No Impact.

STANDARD PROJECT REQUIREMENTS

HYDRO-1: Regulatory Compliance

- Prior to the start of construction involving ground-disturbing activities, Contractor will prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) for DPR approval that identifies temporary Best Management Practices (BMPs) (e.g., tarping of any stockpiled materials or soil; use of silt fences, straw bale barriers, fiber rolls, etc.) and permanent (e.g., structural containment, preserving or planting of vegetation) for use in all construction areas to reduce or eliminate the discharge of soil, surface water runoff, and pollutants during all excavation, grading, trenching, repaving, or other ground-disturbing activities. The SWPPP will include BMPs for hazardous waste and contaminated soils management and a Spill Prevention and Control Plan, as appropriate.
- The project will comply with all applicable water quality standards as specified in the Central Coast Basin Plan.

HYDRO-2: Protection of Surface Water

a. If construction activities extend into the rainy season (October through April) or if an un-seasonal storm is anticipated, Contractor will properly winterize the site by covering (tarping) any stockpiled materials or soils and by constructing silt fences, straw bale barriers, fiber rolls, or other structures around stockpiles and graded areas.
b. All construction activities will be suspended during heavy precipitation events (i.e., at least 1-inch of precipitation in a 24-hour period) or when heavy precipitation events are forecast.
c. All heavy equipment parking, refueling, and service will be conducted within designated areas outside of the 100-year floodplain to avoid water course contamination.
d. Contractor will install appropriate energy dissipaters at water discharge points, as appropriate.

MITIGATION MEASURES

None required.

XI. LAND USE AND PLANNING

ENVIRONMENTAL AND REGULATORY SETTING

The project site is located in a rural setting on the north coast of San Luis Obispo County and is designated as Rural Recreational under the Local Coastal Plan (LCP).

The sites are zoned for Recreation under the San Luis Obispo County's North Coast Area Plan.

Because the site is located on a stretch of Highway 1 that is designated as a national Scenic Byway by the U.S. Department of Transportation, the highway itself is considered as a destination and a scenic resource.

The project is located within the Coastal Zone and is subject to the 1976 Coastal Act and the Coastal Zone Management Act, as administered by the CCC and the County of San Luis Obispo. All construction activities associated with the project would occur on land owned by DPR and within the boundaries of HSSSP.

In addition, the project site is subject to the Hearst Scenic Conservation Easement (SCE) recorded in 2005, which limits development on the west side of Highway 1, except for construction of the PBCT, related parking, and some limited visitor serving facilities. Caltrans is the department responsible for administering the SCE.

IMPACT ANALYIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

DISCUSSION

a. Would the project physically divide an established community?

The project site is located on existing, rural, recreational park lands in HSSSP, west of Highway 1 and already has existing highway access and parking. No residential communities exist on or in the vicinity of the project site. As such, the proposed Project would have no potential to divide an established community.

Conclusion: no impact.

b. *Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The proposed project does involve development of bridges and boardwalks in environmentally sensitive areas which include wetlands. However, the project has sufficient avoidance, minimization and mitigation measures built in that are consistent with the North Coast Area Plan, the Local Coastal Plan, the Conservation Easement, and DPR natural and cultural resource policies. The project is also consistent with the San Simeon State Beach General Plan's recommendation to acquire the coastal strip (Piedras Blancas West Side Public Ownership Area) *"in order to provide public access.*"

Proposed mitigation includes on-site and off-site wetland plan restoration, coastal plan restoration, elevated boardwalks to limit the impacts from hikers, and fencing to provide safe distances of separation between visitors and marine mammals. Installation of physical barriers such as fencing, railings, and viewing platforms will keep visitors out of marine mammal, specifically elephant seal, habitat. Furthermore, elevated bridges and boardwalks will allow wetland flora and fauna to exist and migrate under the structures. Installation of regulatory and interpretive educational signage will inform visitors of safety requirements. With the implementation of the avoidance, minimization and mitigation measures, impacts will be reduced to less than significant.

Conclusion: Less than significant impacts with mitigation.

STANDARD PROJECT REQUIREMENTS

LAND-1

The Project will include regulatory, interpretive, and educational signage as standard project requirements.

PROJECT SPECIFIC REQUIREMENTS

None Required.

MITIGATION MEASURES:

BIOMM-2

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

XII. MINERAL RESOURCES

ENVIRONMENTAL AND REGULATORY SETTING

Environmental Background

The project site is located along a rural stretch of coastline in northern San Luis Obispo County north and south of Point Piedras Blancas. This stretch of coast is characterized by a late-Pleistocene marine terrace landform, formed of uplifted sediments deposited on geologic formations of the Franciscan mélange bedrock Monterey Formation bedrock. The coastal plain here is wider than the surrounding coastline and extends 1-2 miles from the foothills of the Santa Lucia mountains. This marine terrace abuts a highly exposed rocky intertidal shoreline with Point Piedras Blancas dominating the geography. The Piedras Blancas marine terrace was uplifted during the last glacial period and is composed of approximately 125,000-year-old marine deposits (Manson 1985). The geology of Santa Lucia mountains and surrounding landscape is dominated by the Franciscan Formation and pockets of metamorphic geology which harbor concentration of mineral resources such as mercury.

Regulatory Background

Mineral resources are protected by CEQA, but DPR policy prohibits the development or harvesting of mineral resources within DPR lands. DPR policy prohibiting mineral resources development is contained within the Department Operations Manual (DOM) 0300. Nevertheless, mineral resources are considered part of the environment and are addressed in state regulations and codes and are defined as:

> "any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances. Mineable minerals or an "ore deposit" is defined as a deposit of ore or mineral having a value"

Mineral resources are protected under the Surface Mining and Reclamation Act of 1975 (SMARA) of which policy is contained within Public Resources Code Sections 2710-2796 PRC §2710-2796. Additional regulations are provided in the California Code of Regulations (CCR) Title 14, Division 2, Chapter 8: Mining and Geology. The California Office of Mining and Reclamation (OMR) and the State Mining and Geology Board (SMGB) are jointly in charge of administering SMARA requirements.

Mineral Resource Zones (MRZs) are defined by the SMGB and classified according to the value of the resources. The California Geological Survey (CGS) Mineral Resources Project provides information about nonfuel mineral resources. The California Department of Conservation (CGS) designates mineral resource zones throughout the state and aids in identifying where resources are subject to state regulations. The SMARA required the State Geologist to classify land into mineral resources zones based on the known or inferred mineral resource potential of that land (CGS 2024). The California Mineral

Resources Program (MRP) provides objective geologic expertise and information about California's diverse non-fuel mineral resources.

Survey Results

Desktop research was conducted to identify the potential for mineral resources to be located within the Project area. This consisted of a review of the CGS database for mineral resource zones, mineral land classifications, known and active mines, a review of the SMARA Mineral Land Classification report for San Luis Obispo County, and research into known documentation of mineral resources in the vicinity of the Project.

CGS Data

San Luis Obispo-Santa Barbara Production-Consumption Zone

A review of the CGS database found that the Project area was just north of the SMARA Study Area Special Report 162 Mineral Lands Classification: Portland Cement Concrete Aggregate and Active Mines of all other Mineral Commodities in the San Luis Obispo-Santa Barbara Production-Consumption Region (Miller et al. 1991). The Project area is therefore, outside of the San Luis Obispo Santa Barbara Production-Consumption Region and not within any classified production-consumption zones.

Active Mines

A review of the CGS interactive map for active mines found that the nearest active mines are approximately 5 miles south: mine ID 91-40-0041, an open pit at Rancho San Simon; and mine ID 91-40-0031, a streambed/gravel bar skimming and pitting stone mine in Rancho San Simeon. No mines are in the immediate vicinity or within the Project area.

Historic Cinnabar Mining

Historically, cinnabar is the most well-known mineral resource in the vicinity of the Project area, however no cinnabar resources are within or in the immediate vicinity of the Project area. Cinnabar was in high demand during the latter years of the California Gold Rush, as the ore containing mercury, which was used in the process of silver amalgamation, whereby mercury-coated copper plates were used to extract silver and gold from crushed tailings of stamp mills, giving the name "quicksilver" to mercury used for this purpose. In 1862, a party of Mexicans working in the San Simeon area discovered an outcropping of cinnabar at the headwaters of Santa Rosa Creek (Bradley 1912). A rush to mine for cinnabar occurred following the discovery and big corporations with stakes in the gold and silver industry purchased land and mining claims. George Hearst, who had been part of the Gold Rush had pursued mining opportunities in South Dakota and Nevada and discovered a method of processing silver from gold tailings in the Sierra Nevada of California. He discovered the vast silver mines known later as the Comstock Lode in Nevada and by the early 1860s was immensely rich. Hearst purchased the Rancho Piedra

Blanca in 1865, as mining for cinnabar had already began in the Santa Lucia Mountains along the San Simeon and Santa Rosa Creek watersheds beginning in 1862 (Greenwood 1972). Hearst operated many of the cinnabar mines throughout the region in the following decade including The Polar Star Mine (also known as the Black Hawk and Santa Clara mines) located along San Carpoforo Creek, beginning in the 1870s. The Pine Mountain Mining District was created in 1871 and included the Buckeye, Little Almaden, Ocean View, and Pine Mountain cinnabar mines. Cinnabar mining in the region peaked in 1876, when demand was high and over 150 claims were in effect (Bradley 1918; Hamilton 1974). The cinnabar industry faded away by the 1920s in the region. No cinnabar resources are known within the immediate Project area.

Other Mineral Resources

Harvesting of beach gravels was conducted in the early and middle twentieth century from beaches near Piedras Blancas for use in concrete and other construction purposes for Hearst Castle and the Hearst Ranch. Exploration for oil and coal was conducted by the Hearst's in the late nineteenth and early twentieth centuries as well, with a small coal vein discovered in San Simeon and quickly exhausted. No productive sources of oil were ever discovered.

Overall, the Project area contains no known historic or modern mines or other mineral resources. Therefore, no impact to mineral resources will occur for the Project.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Result in the loss of availability of a known mineral resource that is or would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

DISCUSSION

a) Result in the loss of availability of a known mineral resource that is or would be of value to the region and the residents of the state?

The project area is located within a late-Pleistocene marine terrace geology with no known mineral resources.

Conclusion: No Impact

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No locally important mineral resources are delineated within the Project area.

Conclusion: No Impact

STANDARD PROJECT REQUIREMENTS

None Required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None Required.

XIII. NOISE

ENVIRONMENTAL AND REGULATORY SETTING

Noise is defined as unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA).

Some land uses are considered more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. Residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, parks and outdoor recreation areas are more sensitive to noise than are commercial and industrial land uses.

The project is located in a rural area where recreation is the prevailing land use on the west side of the highway and agriculture is the prevailing use on the east side of the highway. The most significant noise generator is vehicle traffic on Highway 1. Consequently, noise levels on the project site and in the vicinity are low and there are no loud sources of noises beyond those associated with agricultural operations and traffic on Highway 1.

The Project is subject to the San Luis Obispo County Noise Element. The nearest sensitive receptors (residences) are two state residences located on the PBCT site. In addition, there are residences located east of Highway 1 near adjacent to the PBCT site). The Noise Element includes acceptable noise levels for single-family residential uses, outdoor sports and recreation uses, and commercial uses. The normally acceptable exterior noise level for single-family residential uses is 60 dBA. The normally acceptable exterior noise level for recreational uses is 65 dBA. The normally acceptable exterior noise level for commercial uses is 67.5 dBA. The State of California Office of Planning and Research (OPR) has also established guidelines for noise compatibility; a noise environment of 50 to 60 dBA is considered to be “normally acceptable” for residential units.

Vibration is a unique form of noise. It is unique because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise; e.g., the rattling of windows from passing trucks. This phenomenon is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, groundborne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB) in the U.S.

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel wheeled trains, and traffic on rough roads.

Vibration impacts would be significant if they exceed the following Federal Railroad

Administration (FRA) thresholds:

1. 65 VdB where low ambient vibration is essential for interior operations, such as hospitals and recording studios
2. 72 VdB for residences and buildings where people normally sleep, including hotels
3. 75 VdB for institutional land uses with primary daytime use, such as churches and schools
4. 95 VdB for physical damage to extremely fragile historic buildings
5. 100 VdB for physical damage to buildings

Construction-related vibration impacts would be less than significant for residential receptors if they are below the threshold of physical damage to buildings and occur during the County's normally permitted hours of construction, as described above, because these construction hours are during the daytime and would therefore not normally interfere with sleep.

The Noise Element of the County's General Plan includes projections for future noise levels from known stationary and vehicle-generated noise sources. According to the Noise Element, the project lies within an area where future noise levels are expected to remain within an acceptable threshold.

Sound is any detectable fluctuation in air pressure and generally is measured on a logarithmic scale in decibels (dB). When unwanted sound (i.e., noise) is measured, an electronic filter is used to de-emphasize extreme high and low frequencies to which human hearing has decreased sensitivity. Resulting noise measurements are expressed in weighting frequencies called A-weighted decibels (dBA). While zero dBA is the low threshold of human hearing, a sustained noise equal or greater than 90 dBA is painful and can cause hearing loss.

Table NOISE-1. Typical Noise Levels

SOUND	SOUND LEVEL (DBA)	RELATIVE LOUDNESS (APPROXIMATE)	RELATIVE SOUND ENERGY
Jet aircraft, 100 feet	130	128	10000000
Rock music with amplifier	120	64	1000000
Thunder, snowmobile (operator)	110	32	100000

Boiler shop, power mower	100	16	10000
Orchestral crescendo at 25 feet, noisy	90	8	1000
Busy Street	80	4	100
Interior of department store	70	2	10
Ordinary conversation, 3 feet away	60	1	1
Quiet automobile at low speed	50	½	0.1
Average office	40	¼	0.01
City residence	30	1/8	0.001
Quiet country residence	20	1/16	0.0001
Rustle of leaves	10	1/32	0.00001
Threshold of hearing	0	1/64	0

Noise is further described according to how it varies over time and whether the source of noise is moving or stationary. Background noise in a particular location gradually varies over the course of a 24-hour period with the addition and elimination of individual sounds. Several terms are used to describe noise and its effects.

- Equivalent sound level (Leq) describes the average noise exposure level for a specific location during a specific time period, typically over the course of one hour.
- Community Noise Equivalent Level (CNEL) is a twenty-four-hour average of Leq with an additional 5 dBA penalty for noise generated between the hours of 7:00 p.m. and 10:00 p.m. and a 10 dBA penalty during the hours of 10:00 p.m. and 7:00 a.m.

The penalties account for how much more pronounced a noise is at night when other sounds have diminished. Federal, state, and local governments have defined noise and established standards to protect people from adverse health effects such as hearing loss and disruption of certain activities.

Noise is defined in the California Noise Control Act, Health and Safety Code, California Code of Regulations (CCR) § 46,022) as excessive or undesirable sound made by people, motorized vehicles, boats, aircraft, industrial equipment, construction, and other objects. The Soundscape Protection Policy states that the Department will preserve, to the greatest extent possible, the natural soundscapes of parks from degradation due to noise (undesirable human-caused sound) and will restore degraded soundscapes to the natural condition wherever possible. The Department will take action to prevent or minimize all noise that, through frequency, magnitude, or duration, adversely affects the natural soundscape or natural resources (e.g., loud motorized equipment during critical mating and rearing periods) (DPR 2004).

Sensitive Noise Receptors

The site is located in a recreational zoned parcel within a State Park and much of the surrounding land uses are comprised of open spaces including agricultural and recreational lands. There are 2 existing State Park residences at the Piedras Blancas

motel property utilized by State Park Rangers/Peace Officers. There are 2 existing residences on the east side of the highway, one of which is owned by Caltrans and will be demolished for their on-site highway mitigation and restoration project. Other sensitive receptors include members of the public visiting the property and state parks staff working on the site.

Existing Ambient Noise Environment

All sensitive receptors are within earshot of Highway 1, and the Pacific Ocean.

Other, temporary minor sources of noise may originate from activities taking place within the park, such as people talking on trails and occasional air traffic consisting of small private planes, Coast Guard helicopters, or the occasional military aircraft. The closest private landing strip or runway is located on Hearst Ranch.

Local Noise Standards

The Coastal Zone Land Use Ordinance or CZLUO (San Luis Obispo County Title 23, Chapter 6, Section 44, 2019) limits exterior, daytime noise levels in recreational settings to a maximum of 60 dB, measured from the nearest parcel boundary.

Biological Resources

HSSSP contains special status wildlife species that can be adversely affected by excessive noise during their nesting and breeding seasons. The USFWS (2006) has developed guidelines for eliminating noise impacts to threatened and endangered wildlife species in this area. These guidelines include seasonal restrictions on the use of noise-generating equipment in potential habitat and/or during periods of nesting or the early phase of rearing of young. These restrictions apply to any use of noise generating equipment throughout the region.

Standard Project Requirements have been incorporated to assure that the proposed project will not result in adverse effects associated with noise to the sensitive wildlife species listed under the Biological Resources section.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in	☐	☐	☒	☐

	the local general plan or noise ordinance, or applicable standards of other agencies?				
b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

DISCUSSION

a) Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The majority of noise will likely occur during the grading and excavation portion of the project that will occur during the initial part of construction. The only noise-sensitive land uses occur at the residential modulars in Site 2. The Project Implementation Section 2.8 notes that the project would involve the use of heavy equipment, such as a backhoe, excavator, grader, bulldozer, loader, compressor, water truck and dump truck during construction.

The project would have a less than significant impact on the exposure of persons to or generation of noise levels in excess of applicable standards. Noise generated during construction will be temporary and intermittent and therefore will have a less than significant impact. Construction will be limited to daytime. All of the sites are in non-public areas and there is no reason for park visitors to venture to these locations, but periodic though temporary construction-related noise will still be audible at a distance to campers or visitors.

Construction Impacts. Construction activities may involve the use of heavy equipment for grading and for the delivery and movement of workers and building materials to the PBCT site. The use of construction machinery will also be a source of noise. Table 8 shows typical noise levels associated with equipment used for the construction of the PBCT.

Construction activities are anticipated to result in some vibration that may be felt on properties in the immediate vicinity of the Project site, as commonly occurs with construction Projects. Project construction would not involve the use of pile drivers, which create a high level of vibration, but could involve the use of bulldozer and other large

equipment on the Project site for construction of proposed PBCT pedestrian bridges. Construction-related noise impacts would be temporary and localized.

Coastal Trail construction would primarily use hand tools and smaller power tools and thereby result in minimal construction noise; however, sections of the Coastal Trail will include bridge installations (with associated piers) and the use of heavy equipment.

Vibration levels would be less than 54 VdB at the caretaker's residence and at the residences located 0.5 mile north of the Project site. Therefore, the Project would not result in excessive ground-borne vibration or noise.

County regulations limit the hours of construction to daytime hours between 7:00 AM and 9:00 PM weekdays. State Parks contracts generally limit working hours in public use areas to between 8:00 AM and 5:00 PM on weekdays.

Operational Impacts. With regard to the impact of transportation-related noise sources on patrons of the PBCT, the project site is within close proximity to Highway 1 which is a source of transportation-related noise. The Noise Element establishes a threshold for acceptable exterior noise levels for sensitive uses (such as motels and residences) of 60 decibels[2] along transportation noise sources and provides an estimate of the distance from certain roadways where noise levels will exceed those levels. For Highway 1 in the project vicinity, the 60 decibel standard is projected to occur 103 feet from the centerline. It should be noted that the Highway 1 Realignment Project relocated the highway about 75 feet to the east in the vicinity of the Piedras Blancas hotel. Therefore the potential impacts of noise exposure from transportation sources is considered less than significant.

Conclusion: Less than significant impact. Compliance with County noise regulations and standard project requirements will ensure noise impacts will remain less than significant.

Due to the brief duration of exposure, and with implementation of Standard Project Requirement - NOISE 1, noise impacts to those living in or traveling through the vicinity of the project will have a less than significant impact. After the projects are complete, noise levels will return to pre-construction levels and will not result in a permanent increase in ambient noise.

b) Would the project generate excessive groundborne vibration or groundborne noise levels?

Groundborne vibration and groundborne noise results from the use of heavy construction equipment and may vary depending on the specific construction equipment used and

[2] The sound level obtained by using the A-weighting filter of a sound level meter, expressed in decibels (dB). All sound levels referred to in this policy document are in Aweighted decibels. A-weighting de-emphasizes the very low and very high frequencies of sound in a manner similar to the human ear. Most community noise standards utilize A-weighting, as it provides a high degree of correlation which human annoyance and health effects.

activities involved. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. The effects of ground-borne vibration include feelable movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. However, ground vibrations from construction activities do not often reach the levels that can cause damage to structures, but they can achieve the audible and feelable ranges in buildings that are very close to a work site. Unless implementation activities using heavy equipment are conducted extremely close (within a few feet) to neighboring structures, vibrations from proposed project implementation activities are expected to rarely reach levels that damage structures. For example, heavy equipment (e.g., a large bulldozer) generates vibration levels of 0.089 inch per second peak particle velocity at a distance of 25 feet. This level is less than the level at which structural damage may occur to normal buildings (0.2 in/sec PPV at a distance of 25 feet) or to old or historically significant buildings (0.1 in/sec PPV at a distance of 25 feet) (Federal Transit Administration 2006). Implementation activities would not occur in the immediate vicinity of these buildings.

Conclusion: Less than significant impact.

c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The proposed project is not located within an airport land use plan but is within 2 miles of a private airstrip. There would be no measurable construction noise impact to workers or residents located near these airstrips.

Conclusion: No Impact.

STANDARD PROJECT REQUIREMENTS

NOISE-1: CONSTRUCTION ACTIVITIES

- Internal combustion engines used for project implementation will be equipped with a muffler of a type recommended by the manufacturer. Equipment and trucks used for Project-related activities will utilize the best available noise control techniques (e.g., engine enclosures, acoustically attenuating shields or shrouds, intake silencers, ducts, etc.) whenever necessary.
- Contractor will locate stationary noise sources and staging areas as far from potential sensitive noise receptors, as possible. If they must be located near potential sensitive noise receptors, stationary noise sources will be muffled or shielded, and/or enclosed within temporary sheds.

- Construction activities will generally be limited to the daylight hours, Monday – Friday. If work during weekends or holidays is required, no work will occur on those days before 8:00 a.m. or after 5:00 p.m.
- All motorized construction equipment will be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None Required.

XIV. POPULATION AND HOUSING

ENVIRONMENTAL SETTING

The proposed project is located roughly ten miles north of the unincorporated community of San Simeon, which had a dispersed rural population of 462 in 2010. Other development in the area includes the Elephant Sea Viewing Area, the Piedras Blancas Light Station, Hearst San Simeon State Historical Monument (Hearst Castle Visitor Center and Hearst Castle), and the San Simeon Creek Campground, located in north Cambria. The project sites are part of HSSSP which spans more than twenty miles of coastline located largely west of Highway 1. This area of San Luis Obispo County is rural in nature.

Two state residences exist on the Piedras Blancas site. Northeast of the Piedras Blancas site there are two residences, one of which will be removed by Caltrans for on-site mitigation and plant restoration for the realignment of Highway 1. The property proposed for the trail is owned by State Parks or will become property of State Parks after transfer from Hearst Corporation. This project does not include the removal of any housing.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION

a) Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

This project will not induce any population growth. The Project is expected to attract recreational visitors to the area to hike. Workers employed at the project site are expected to be derived from existing State Parks staff and the local work force and not result in a population growth, additional businesses or services, or require additional housing.

Conclusion: No impact.

b) Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

These projects will not displace any housing.

Conclusion: No impact.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

XV. PUBLIC SERVICES

ENVIRONMENTAL SETTING

The project site is located within HSSSP in northwest San Luis Obispo County about ten miles north of the community of San Simeon Acres. In addition to providing camping, the park includes several facilities such as day-use picnic areas, hiking trails, a boat ramp, a fishing pier within San Simeon Bay, and 18 miles of beaches along the California Highway 1 corridor.

Fire Protection

Fire protection is provided by CAL FIRE/SLO County Fire from Fire Station 10 located at 6126 Coventry Ln. in the community of Cambria, about 13 miles south of the project area. The Cambria Fire Station is staffed by a cooperative agreement between CAL FIRE and the County of San Luis Obispo and serves the citizens of the Northern Coast with year around fire protection, prevention, rescue and emergency medical services. According to San Luis Obispo County, emergency response times to the project area are over 20 minutes. There is also a small fire protection facility located at Hearst Castle State Historical Monument and in the community of Cambria. The Piedras Blancas motel building contains a 16,000-gallon water tank dedicated to emergency firefighting and fire hydrants. The motel site also has a 4,000-gallon storage tank for general usage. The Park has a Type 1 structure fire engine, a Type 3 off-road engine and the State Parks SLO Coast District has five Type 6 brush fire engines. Cambria Healthcare District provides emergency ambulance services.

Police Protection

24 hour per day law enforcement coverage is provided on-site by State Park Ranger Peace Officers, with statewide jurisdiction. This 24-hour law enforcement coverage includes EOD canines and intrusion alarm monitoring. Hearst Castle provides its own Security IT staff that maintain and operate all security systems District-wide. Additional resources are provided by allied agencies such as the SLO County Sheriff's Department and California Highway Patrol.

Schools

The closest schools are Cambria Grammar School, Cambria Middle School, Coast Union High School, and the Leffingwell continuation school, all located in Cambria.

Parks

San Luis Obispo County has a wealth of outdoor recreational opportunities and areas of unsurpassed natural resources protected as public land. The county contains at least 350,000 acres of protected open space. This is comprised of State Parks, County and

City Parks, National Forest land, BLM land and private land under conservation. These areas contribute to the quality of life in San Luis Obispo County and provide needed recreational opportunities for local residents and for visitors from around the world.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☐	☒
v. Fire protection?	☐	☐	☐	☒
vi. Police protection?	☐	☐	☐	☒
vii. Schools?	☐	☐	☐	☒
viii. Parks?	☐	☐	☐	☒
ix. Other public facilities?	☐	☐	☐	☒

DISCUSSION

a. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services?

Project implementation will not have an impact on fire protection and police services. As a recreational trail, the Project will have no impact on local schools. The Project will not generate new visitation at levels substantial enough to cause an impact to the park or other surrounding public facilities.

Conclusion: No impact.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

XVI. RECREATION

ENVIRONMENTAL SETTING

The proposed project would develop a portion of HSSSP with an extended coastal trail to facilitate expanded recreational opportunities in the region. Following construction, the PBCT will be open to the public year-round and provide additional low-cost recreation for County residents and the area's tourist population. The amenities provided as part of the project are designed to serve all age groups and would be ADA accessible.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

DISCUSSION

a) Would the Project increase the use of existing neighborhood and regional parks or

other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

This project will increase the number of visitors at HSSSP and will increase the use of the State Parks infrastructure. Impacts to existing neighborhood and regional parks would be negligible. Construction of the PBCT will have a beneficial effect as it will provide additional opportunities to recreate and reduce demand on other existing nearby parks. The PBCT has been designed to keep impacts within the designated trail.

The proposed project is in conformity with the public access and recreation policies of Chapter 3 of the California Coastal Act because the project is adjacent to the coast and the project will provide access to coastal waters and recreation areas.

Conclusion: Less than significant impact.

b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The PBCT Project will impact the local physical environment. The Coastal Commission has required construction of additional parking lots to accommodate increased visitation. As such, the impacts of the PBCT will be mitigated, as described in this document. In addition, the increased use of this coastal trail is consistent with the intent of the project, is consistent with the DPR mission statement, and is viewed as a positive opportunity for visitors.

In particular, it is reasonably foreseeable that increased visitation and hiking along the trail will bring visitors closer to Northern elephant haul-out beaches, pupping beaches, and general elephant seal habitat. The Project was designed to minimize potential impacts to elephant seals, by constructing elephant seal fencing at locations where the trail or viewing platform will allow visitor usage close to haul outs that are not currently fenced, as well as the construction of a viewing platform at Arroyo del Corral, similar to those in use at Caltrans Vista Points 3 and 4, to allow visitors to view elephant seals from a distance. Caltrans has completed construction of elephant seal fencing at Arroyo del Corral for the related highway realignment project and DPR has constructed fencing in other locations where visitor usage occurs close beaches occupied by elephant seal. This fencing has functioned well. For a complete analysis of this recreational facility's construction impacts to biological resources, please refer to the Biological Resources Section.

Conclusion: Less than significant impact.

STANDARD PROJECT REQUIREMENTS

LU-1

- The Project will include regulatory, interpretive, and educational signage as standard project requirements.

REC-1

- The Project will include handrails along the bridges and vista points, and boardwalks within ESHA to keep people on the trail as a standard project requirement.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

BIOMM-2

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

XVII. TRANSPORTATION

ENVIRONMENTAL SETTING

The project site is accessed from California Highway 1. As discussed in the Noise Pollution analysis, use of Highway 1 is variable and dependent on season and time of day, as well as road conditions and repairs. The period of highest use is during the summer, and generally mid-morning to afternoon (10 AM to 4 PM). While traffic does tend to slow during this peak period, it is not considered to be at or above capacity in any local area planning documents.

According to Caltrans, the annual average daily traffic (AADT) on Highway 1 in 2015 (without the proposed project) is 3,200 AADT (1.1 million trips per year).. In 2035 the AADT is anticipated to increase to 3,500 (1.3 million trips per year without the proposed project). Because this stretch of Highway 1 (also referred to as the "Cabrillo Highway) is a federally designated "Scenic By-way" and a destination unto itself, as well as the gateway to Big Sur, vehicles are already present on this section of Highway. Other nearby attractions include Hearst Castle and the elephant seal rookery. Given the popularity of the immediate area and the popularity of existing road trips, the subject project is not expected to significantly affect the amount of vehicle miles traveled.

For regional travel to the project site, it is possible to travel to the park from major metropolitan areas including Los Angeles and San Francisco, each approximately 4 hours away, using low emission mass transit. This includes electric light rail service in the above cities to Amtrak trains or buses or other tour buses stopping in San Luis Obispo, ending in CNG powered buses to Hearst Castle/San Simeon. SLORTA has transit stops at the Hearst Castle Visitor Center, which is about 7 miles from the southern end of the Project.

As part of the highway relocation project, Caltrans installed left-hand turning lanes to accommodate northbound traffic accessing the Arroyo de la Cruz parking lot, the former Piedras Blancas Motel, and the North Lighthouse Beach parking lot (0.5 miles north of the Piedras Blancas Light Station access road). Additional parking spaces and related improvements are available at the Piedras Blancas motel if use of those trail heads and visitation to the PBCT increases more than anticipated.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
1. Conflict with a program plan, ordinance or policy addressing the	☐	☐	☐	☒

	circulation system, including transit, roadway, bicycle and pedestrian facilities?				
2.	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	☐	☐	☒	☐
3.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
4.	Result in inadequate emergency access?	☐	☐	☐	☒

DISCUSSION

a) Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The proposed PBCT has been identified in the County's Coastal element as well as in the overall California Coastal Trail project, and as such, is consistent with all relevant programs, plans, ordinances and policies.

Adequate parking exists for the expected PBCT use. The realignment of Highway 1 anticipated increased parking needs. To mitigate this likelihood, sections of Highway 1 (existing) were repurposed to double parking capacity at the motel, should additional parking be needed. Caltrans' project to realign Highway 1 included certain improvements that directly affect the PBCT Project: the construction of new parking lots at North Lighthouse Beach and Arroyo de la Cruz, and left turn pocket lanes. The parking lots will alleviate potential impacts to traffic circulation, congestion, and pedestrian traffic along Highway 1 as a result of the PBCT. The left turn pocket lanes were constructed at Arroyo de la Cruz, Piedras Blancas Motel site, and at North Lighthouse Beach, and will reduce potential impacts to safety and traffic congestion as a result of the PBCT to less than significant.

Conclusion: Less than significant impact with mitigation.

b) b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

The Project would result in an increase of trail capacity for visitors by adding 4.2 miles of new trail to the park. CEQA now requires that a lead agency use vehicle miles traveled (VMTs) to determine the effects of a project on transportation. VMTs refers to the amount

and distance of automobile travel that is attributable to a project. That makes sense when analyzing the commute patterns for residents of a new development. It makes less sense on an activity occurring at a park (or adjacent to the famous coastal highway) of regional, national, or even international importance.

Fortunately, the CEQA Guidelines give agencies wide latitude in assessing transportation impacts with VMT. Where quantitative models or methods are unavailable, agencies may assess VMT qualitatively, using factors such as availability of transit and proximity to other destinations.

DPR has an entire marketing department whose role is to entice residents out of their homes and on the roads to visit DISTANT parks and the nature of state park units is that visitors do often travel (and travel often) for great distances to see parks in the system. Furthermore, a quantitative analysis may reveal the great distances some drive, but it isn't always the "project" to which the travel is attributable.

As HSSSP is located along the internationally known State Highway 1 from which many site seeing attractions abound and for some users, this trail may simply be a singular stop made while on a much longer journey. Certain park units also receive a high percentage of visitation from those that live proximate to the park and frequently use existing trails in the vicinity. Many of the potential trail users then will consist of vehicle trips that already occur, and this Project will simply capture those trips.

As noted above, San Luis Obispo County maintains fixed route transit stops at the Hearst Castle Visitor Center and Hearst at San Simeon. These are not considered to be high-quality transit stops, defined as a "site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." While not considered high-quality transit stops and although they exceed ½-mile distance from the southern end of the proposed PBCT, frequent trail users living in the region are likely to be more flexible with longer distant walks between the transit stop and their final destination.

Conclusion: Less than significant.

c) *Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The project will have no geometric design features or incompatible uses.

Conclusion: No impact.

d) *Would the Project result in inadequate emergency access?*

The proposed Project would not change the availability of emergency access. Access to the Project site will be maintained in accordance with Caltrans and CAL FIRE standards.

Conclusion: No impact.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

XVIII. TRIBAL CULTURAL RESOURCES

This section serves as the environmental impact analysis for tribal cultural resources and contains an overview of the regulatory setting, background and surveys concerning these resources within the context of the project. Tribal cultural resources are resources important to modern Native American tribes and are defined under the California Public Resources Code. In addition to those resources described in Section IV. Cultural Resources, tribal cultural resources may overlap or be distinct and therefore have been distinguished within CEQA per Assembly Bill 52.

TRIBAL CULTURAL RESOURCES REGULATORY SETTING

DPR is required to consult with California Native American tribes regarding projects that may impact tribal cultural resources under PRC 21080.3.1(b)(d). Additionally, the department has requirements to consult tribes under E.O. W-26-92. Under PRC 21074 tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, or objects with cultural value to a tribe. Important tribal cultural resources can include archaeological resources but are not limited to them. Other places and landscapes can be considered tribal cultural resources. If tribal cultural resources are identified during consultation, the agency should evaluate them for the California Register of Historical Resources (PRC 21080.3.2(a)).

PRC Section 21084.2 establishes that *"[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."* To help determine whether a project may have such an effect, PRC 21080.3.1 and 21080.3.2 require a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (PRC § 21080.3.1.) PRC Section 21074(a) defines tribal cultural resource as either:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribe that are either of the following: a) included or determined to be eligible for inclusion in the CRHR, or b) included in a local register of historic resources as defined in subdivision (k) of Section 5020.1.

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph the lead agency shall consider the significance of the resource to a California Native American tribe.

If a lead agency determines that a project may cause a significant impact or substantial adverse change to tribal cultural resources and has issued a notice of preparation of an environmental impact report or notice of intent to adopt a Mitigated Negative Declaration, the lead agency must consider measures to mitigate that impact. PRC 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources.

The federal lead agency for any federal undertaking must consider the effects of the undertaking in regard to the National Historic Preservation Act and Section 106. This requires procedures for Native American tribal consultation, which will be conducted by the federal lead agency, in this case the ACOE. DPR will engage in tribal outreach and consultation to satisfy CEQA.

TRIBAL CULTURAL RESOURCES SURVEY AND TRIBAL CONSULTATION

HSSSP is part of the traditional homelands of Salinan and Northern Chumash people. For an extended discussion of the Native American ethnographic, historic and precolonial history of the region, see section IV. Cultural Resources. Tribal cultural resources have the potential to exist within most all Native American archaeological sites in the District, but they also include other resources such as landforms, biological resources, aquatic resources, mineral resources and cultural landscapes.

The Santa Ynez Band of Chumash Indians and the Tule River Indian Tribe are the only federally recognized tribes amongst the other non-federally recognized tribes and contacts officially listed on the Native American contact list for San Luis Obispo County with the Native American Heritage Commission (NAHC). DPR regularly consults with the Salinan Tribe of Monterey and San Luis Obispo Counties, the Xolon Salinan Tribe, the yak tityu tityu yak tiłhini Northern Chumash Tribe and the Northern Chumash Tribal Council for activities within HSSSP.

Native American Consultation

Initially during planning for the PBCT as part of the Caltrans Highway 1 realignment, DPR conducted cultural resources surveys and Native American outreach. Initial notification of the project to tribes on the Native American Heritage Commission (NAHC) Native American contact list was conducted by District Archaeologist Elise Wheeler on September 29, 2017 (see Appendix E). Notification letters were sent out to all the contacts on the NAHC contact list for the County informing recipients of the project proposal, a description of the design and purpose, and the proximity of the trail to known Native American archaeological sites, and a request to respond with any question, concerns, or requests to initiate formal consultation. An email response was received by the Salinan Tribe of Monterey and San Luis Obispo Counties on September 25, 2017. After brief consultation with the District Archaeologist, the tribe agreed to the project proposal, finds and mitigation measures included and had no further concerns.

As the project remained inactive for several years Native American outreach and notification was re-initiated by current District Archaeologist Chad Jackson on January 29, 2019, via letters and emails to all the contacts on the NAHC Native American contact list for the project to update the recipients of the project status. Two email responses were received with subsequent email correspondence occurring between the District Archaeologist. One response was from the Santa Ynez Band of Mission Indians requesting that the San Luis Obispo local tribal groups be notified, since they did not have any concerns with the project, of which DPR informed them this had already occurred. The Salinan Tribe of Monterey and San Luis Obispo County responded on February 5, 2019 informing DPR of their connection with the area and photo documentation of Salinan elders at Piedras Blancas Light Station with ethnographer J.P. Harrington in the 1920s. They requested notification if anything were to be discovered during construction, that as long as the resources were avoided there was no concern, and to stay informed of project developments. On June 11, 2019 Mr. Jackson consulted with the tribe on the project, conducted an interview with Patti Dunton and received documents about their connection to the Piedras Blancas area (Salinan Tribe 2019). They also provided documents relating to ethnographic research by Harrington describing placenames in the Piedras Blancas area and excerpts from notes taken by Harrington through interviews with his informants, including Pacifico Gallego. The tribe requested to be kept notified of work in the area of Piedras Blancas and had no additional concerns, and communication has continued.

As part of the revisited project proposal in 2019, DPR submitted a sacred lands files (SLF) search to the NAHC on March 10, 2019. A positive search response was received on April 16, 2019 (Appendix F). The NAHC stated to contact the San Luis Obispo County Chumash Council regarding the positive search result, as well as to inform the contacts on the attached Native American contact list of the project. A letter was sent to the San Luis Obispo County Chumash Council on April 16, 2019, but no response was received.

A formal request to the NAHC for a Sacred Lands File Search was submitted for the project on April 5, 2019, and a response was received indicating one positive result. The response indicated to contact the San Luis Obispo County Chumash Council regarding information about the positive result. A letter was sent out to the Council on April 16, 2019, but no response was received. conducted on initiated by means of a written letter explaining the scope of the project and by follow-up emails and telephone calls to interested parties as outlined in the contact list provided by the NAHC.

The project again became active and modified in 2023 to only include the PBCT trail and DPR began preparing a revised MND to support the project. As part of the project review, project notification letters and invitations for formal tribal consultation was re-initiated and written letters were mailed out to all the contacts provided on the NAHC Native American contact list for the project on January 08, 2023. Letters provided a brief project description, location and description of the four sites, location maps, and design (Appendix E). After letters were sent, follow up consultation occurred through email notifications to the Salinan Tribe of Monterey and San Luis Obispo Counties, the Xolon Salinan Tribe and the yak tityu tityu yak tiłhini Northern Chumash Tribe. One response was received by the

Xolon Salinan Tribe on March 8, 2023, requesting further information about proposed ground disturbance, the trail length and results of cultural resources surveys. They also asked if there was to be a name given to the trail. DPR sent copies of past cultural resources studies, maps and other requesting information to the tribe. Mr. Jackson followed up with Karen Fontanetta from the Xolon Salinan Tribe on May 1, 2023, via phone and they discussed the project and agreed to follow up about additional information. An in-person meeting was then held on September 29, 2023, with Mr. Jackson, Ms. Fontanetta and Karen White from the tribe. They discussed the project and concerns about cultural sites in the vicinity of the PBCT. Mr. Jackson informed them the PBCT alignment was designed to avoid sensitive cultural sites and were pleased with the design and planned avoidance and approved. It was agreed by both parties to inform of project-related ground disturbing activities and if any tribal cultural resources are uncovered or discovered during the project. Subsequent correspondence with the tribe and their cultural resources staff resulted in the sharing of information about research in the area, archaeological sites in the vicinity of the project area, the tribe's affiliation with the project area as within their territorial boundaries, and about lineal descendants working in the area and on the Hearst ranch through the Mexican period into the early American period. Subsequent consultation with the tribe shared information between both tribes about cultural sites, their locations in relation to the project and historical information about the tribe's ancestral connections with the project area and post-mission presence on the Hearst Ranch and other properties in the vicinity of the project. The tribe followed up on December 13, 2023, with a request to conduct tribal monitoring for the project.

Harrington Photo #81-14089

María Jesusa Encinales Mora (left), María de los Angeles (center), and Juan Romero (right), photographed at Piedras Blancas during Harrington's place name-recording trip, c1931.

Figure CULT-2. Photo of Salinan ancestors at Point Piedras Blancas in 1930 with ethnographer J.P. Harrington (Salinan Tribe 2021).

TRIBAL CULTURAL RESOURCES RESEARCH

Tribal cultural resources research was conducted by a review of known literature and documents provided by tribes during consultation. A review of excerpts by J.P. Harrington discovered a description by a Salinan informant to Harrington describing point Piedras Blancas being called "*tewi*", the Migueleño Salinan word for Pelican (Salinan Tribe 2021). The rancherías recorded by missions at San Antonio and San Miguel described *Chitama* as a village in the Piedras Blancas region. It was interpreted by Milliken and Johnson (2005) as being just south of San Carpoforo Creek, according to descriptions by missionaries where three individuals were brought to Mission San Antonio between 1774 and 1796, and one to Mission San Miguel in 1808. The only other recorded ethnohistoric village was described as being further to the south, called *Chaal* where some of the first known individuals were brought to Mission San Antonio from the coast, beginning in 1773. No archaeological sites within the PBCT alignment or immediately adjacent have been shown to be the location of any recorded rancherías through either archaeological or ethnographic research. However, it is likely that at least one of these rancherías was located somewhere in the San Simeon Point and Point Piedras Blancas region.

Overall research into tribal cultural resources and information shared during tribal outreach concluded the project area and Point Piedras Blancas in particular, were of special cultural importance to both Salinan and Northern Chumash peoples. Concerns about avoiding tribal cultural resources were expressed, and support of the project was universal amongst all tribes who responded. Tribes were supportive that avoidance of cultural resources was built into the project design already and tribes were pleased the trail will contain the public to the PBCT itself and discourage the public and overall pedestrian traffic from crossing into archaeological sites and potentially impacting tribal cultural resources. Standard measures are included below to ensure no known or unknown tribal cultural resources are impacted by the project and that the project adheres to overall measures in place to protect resources.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the	☐	☐	☐	☒

	landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
ii.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

DISCUSSION

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No known tribal cultural resources listed or eligible for listing in the CRHR or local registers are within the Project area. The PBCT will avoid all known tribal cultural resources. Less than signficant.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Tribal cultural resources have been identified in the immediate vicinity of the project area, but no impacts are expected to occur due to the intentional placement of the PBCT trail

alignment to avoid known archaeological site boundaries where sensitive tribal cultural resources are present. Past mitigation and evaluation work for Caltrans projects have already impacted areas where the PBCT will be placed, and the relatively shallow excavations needed for the project will not impact any intact tribal cultural resources. Standard and specific project requirements listed below will ensure no impact occurs to tribal cultural resources. The impact will be less than signficant.

STANDARD PROJECT REQUIREMENTS

CULT-1: Cultural Resource Awareness Training

- Prior to the start of ground disturbing activities, cultural resources awareness training will occur for all construction staff. The purpose of the training will be to educate construction personnel as to the potential presence of historic resources and/or archaeological resources within subsurface soils and that DPR staff and tribal monitors may be onsite to inspect for such resources within excavations. Staff will be educated on the appearance and types of objects that may constitute historic or archaeological resources and instructed to refrain from disturbing these resources. The staff will be instructed to halt work in the event any such cultural resources are unearthed or encountered on the surface.

CULT-2: Inadvertent Discovery and Treatment Plan

- If any previously undocumented cultural resources are inadvertently encountered within project excavations (including but not limited to dark soil containing, bone, flaked stone, ground stone, or deposits of historic trash), work within the immediate vicinity of the find will be halted or diverted until the District Archaeologist, or a DPR-qualified cultural resource specialist has evaluated the find and implemented appropriate treatment and regulatory compliance, including contacting a Native American tribal monitor and drafting an Archaeological Treatment Plan.

CULT-3: Human Remains

- In the event human remains are discovered work will cease in the immediate area of the find until further notice and the onsite DPR representative will notify the District Archaeologist or District Superintendent Designee who will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code, and the Native American Heritage Commission (NAHC). Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered. In addition, the DPR district archaeologist will notify the SLO County Environmental Coordinator (or authorized representative) of the discovery.
- The SLO County Coroner will make the determination of whether the human remains are of Native American origin and will contact the NAHC in Sacramento, who will then identify a most likely descendant (MLD). Once appointed, the MLD

will then have 24 hours to visit the site, inspect the find and recommend appropriate treatment and disposition of the remains. Work will not resume in the area of the find until proper disposition is complete (PRC §5097.98). No human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the site prior to determination.

PROJECT SPECIFIC REQUIREMENTS

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 tityu tityu yak tiłhini 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.

MITIGATION MEASURES

None required.

XIX. UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL SETTING

The two state residences at Piedras Blancas receive water from two existing wells. Wastewater disposal is provided by two existing septic systems which will remain. Electricity is provided by Pacific Gas and Electric via a 12 kW system that runs parallel to Highway 1. Natural gas (propane) for cooking and heating is stored on site in two propane tanks.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LES S THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

DISCUSSION

a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The construction and use of the coastal trail is not anticipated to create significant additional demands on existing utilities or services. The coastal trail is a day-use only facility that provides passive recreational opportunities such as hiking and biking. Existing restrooms, water supply, electricity, and related utilities and services at the Piedras Blancas motel are expected to meet demands created by hikers, bikers, and visitor use of the trail. No services or utilities will be available at or provided at the Arroyo de la Cruz parking lot or the north lighthouse beach parking lot, however restrooms and additional parking are available at the Hearst Beach pier and the Hearst Castle Visitor Center. EV charging stations are also available at the Visitor Center.

Conclusion: Impacts will be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The project is not expected to create a demand for additional water supplies above and beyond what is currently available at the public restrooms serving the Piedras Blancas Motel, Hearst Beach and Pier, and at the Hearst Castle Visitor Center.

Conclusion: Impacts will be less than significant

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The project will not provide additional restroom facilities or create a demand for said facilities.

Conclusion: Impacts will be less than significant

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The PBCT project will not generate solid waste or garbage in excess of existing capacity to collect garbage at the Piedras Blancas Motel property, the Hearst Beach and Pier, or the Hearst Castle Visitor Center where solid waste dumpsters are stationed to collect garbage.

Conclusion: Impacts will be less than significant

e) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The project will comply with federal, state, and local regulations related to solid waste by providing trash receptacles and dumpsters at the Piedras Blancas Motel property, the Hearst Beach and Pier, and at the Hearst Castle Visitor Center.

Construction of the PBCT project would generate solid waste. Following construction, solid waste would be temporarily stored onsite in dumpsters as required by local and state statutes. Solid waste disposal for HSSSP is by franchise contractor. All waste is being hauled to the Cold Canyon landfill site 7.5 miles south of San Luis Obispo. In 2009, the Cold Canyon Landfill operated at 32 percent of its permitted daily capacity, and as of June 2010, the landfill had a remaining capacity of approximately 1.83 million cubic yards. In November 2012, the County Board of Supervisors approved an expansion of the landfill's disposal-area footprint by approximately 46 acres (additional 13.1 million cubic yards) (San Luis Obispo County, 2012). Therefore, existing landfills would have the capacity to serve the project.

Conclusion: Impacts will be less than significant

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION REQUIREMENTS

None required.

XX. WILDFIRE

ENVIRONMENTAL SETTING

On October 11, 2022, the California Attorney General released guidance for analyzing and mitigating a proposed development project's impacts on wildfire risk, emergency access, and evacuation.

The California Office of the State Fire Marshall has developed fire hazard maps for each county in California. The maps include areas that fall under the responsibility of local, state, and federal governments. The San Luis Obispo County fire hazard map (see below) includes the project area and associated fire severity zones. This project is located within the State Responsibility Area. The PBCT is in a Moderate Severity Zone, while the District Office Modular Site is in a Moderate Fire Severity Zone (Office of the State Fire Marshall, 11/7/23).

The likely fire hazard severity can be influenced by a number of factors, including the age of vegetation, accumulation of dead plant material, vegetation management programs that may have been implemented, period of time since a stand of vegetation was last burned, historic climate, and topography of the region.

The recent history of fire in the region has been catalogued by the California Department of Fire Protection and Forestry (CalFire). Though not complete, the database generally includes fires of at least 300 acres; fires on U.S. Forest Service land that are least 10 acres are also included. The California Highway Patrol (CHP) provides safety and law enforcement patrol for Highway 1 in cooperation with the San Luis Obispo County Sheriff's Department.

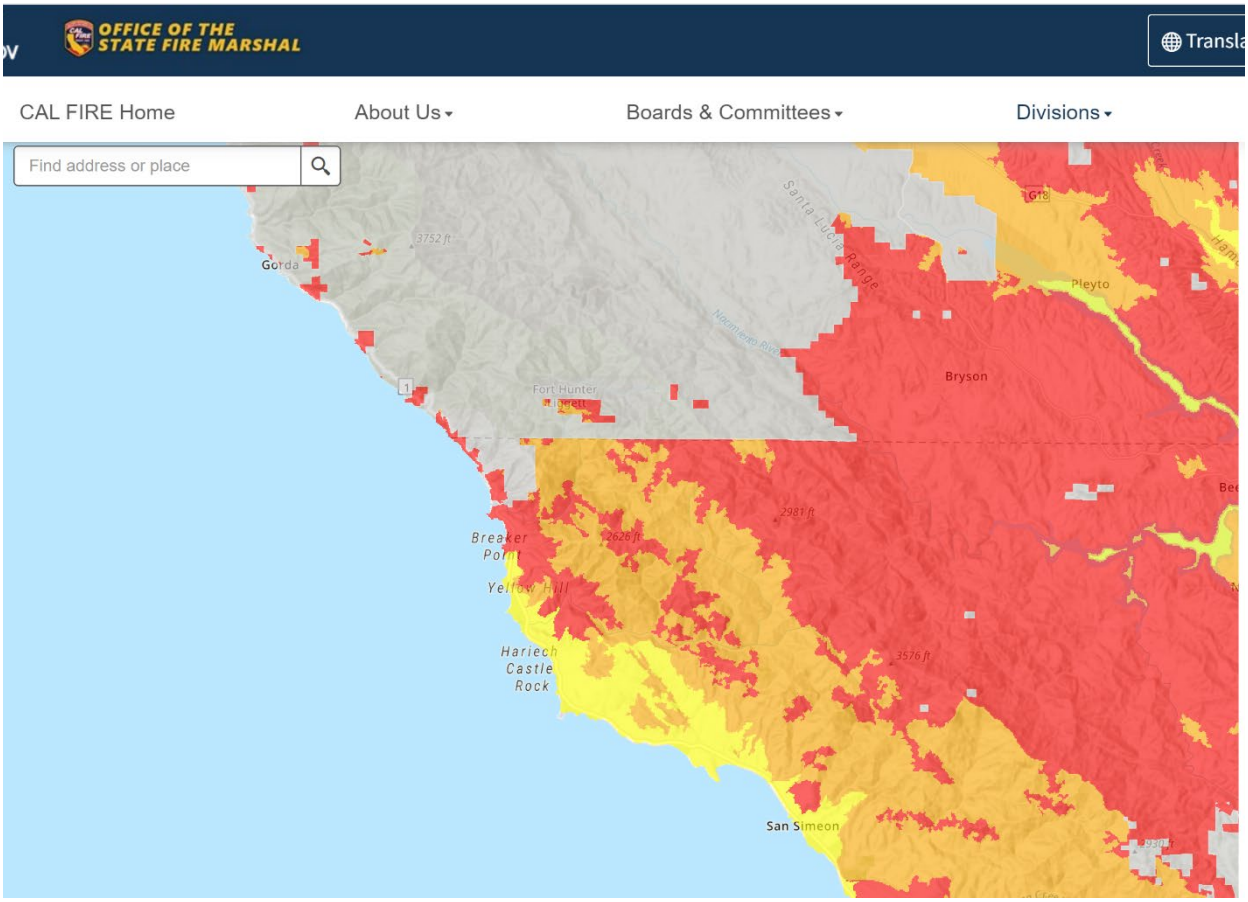

Figure FIRE-6. Fire Hazard Severity Zones-Office of the State Fire Marshall

Yellow=Moderate, Orange=High, Red=Very High. The PBCT is entirely located in the yellow Moderate Hazard Severity Zone.

Fuels are classified into four categories based on how they respond to changes in atmospheric moisture. This response time is referred to as time lag. The four categories are as follows: Fuels are classified into four categories based on how they respond to changes in atmospheric moisture (National Wildfire Coordinating Group, 2023). This response time is referred to as time lag. The four categories are as follows:

- 1-hour fuels: up to 1/4 inch in diameter
- 10-hour fuels: 1/4 inch to 1 inch in diameter
- 100-hour fuels: 1 inch to 3 inches in diameter
- 1000-hour fuels: 3 inches to 8 inches in diameter

In general, higher temperatures increase fire danger, but relative humidity and wind speed are the most important factors among the weather variables. As relative humidity drops, fuel moisture also decreases. One-hour fuels are the most critical regarding fire starts, followed by 10-hour fuels due to their relatively short drying times. One-hundred-hour and larger fuels sustain fires once they start burning and provide most of the heat and flame

intensity of fires. Older forest stands with wider spacing between trees are likely less susceptible to stand-replacement fires than younger, densely spaced stands. In addition, forests within the coastal fog belt have a higher moisture level and generally experience longer fire return intervals than interior areas.

IMPACT ANALYSIS

Thresholds of Significance and Determinations of Impacts

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LES S THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

DISCUSSION

a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The proposed project is primarily located within existing open conserved lands, with a small segment skirting the Piedras Blancas Motel and a state residence. Roads are well maintained and consist primarily of two lanes. The proposed project will not impair an adopted emergency response plan or emergency evacuation plan.

Conclusion: Less than significant.

b) *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The Proposed Project consists of the construction of a new trail on relatively level terrain in an area designated as having a moderate fire hazard severity risk. The use of construction equipment could result in an increased risk of wildfire as the trail is developed. Implementation of standard project requirement **WLDF-1: Fire Prevention** as noted below, will minimize that risk.

Construction of a new trail will introduce park visitors to trails in a new area of the park, where human (mis)behavior could potentially exacerbate wildfire risks. However, the risk of wildfire is likely higher from discarded cigarettes from passing vehicles on the adjacent highway than from park visitors. As such, the Project is will not exacerbate wildfire risks, exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Conclusion: Less than significant.

c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

As noted above, the project does not entail the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines and other utilities). As such, the project will exacerbate fire risk or otherwise result in impacts to the environment.

Conclusion: Less than significant.

d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Given the setting of all Project Site components being on relatively level ground, and the project design, the project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Conclusion: Less than significant impact.

STANDARD PROJECT REQUIRMENTS

WLDF-1: Fire Prevention

a) Prior to the start of construction, Contractor will develop a Fire Safety Plan for Cal Fire approval. The plan will include the emergency calling procedures for both the California Department of Forestry and Fire Protection (CDF) and local fire department(s).

b) All heavy equipment will be required to include spark arrestors or turbo chargers (which eliminate sparks in exhaust) and have fire extinguishers on-site.

c) Construction crews will park vehicles 500 feet from flammable material, such as dry grass or brush. At the end of each workday, construction crews will park heavy equipment over a non-combustible surface to reduce the chance of fire.

d) DPR personnel will have the Emergency Command Center contact information on hand, which allows direct contact with CAL FIRE and a centralized dispatch center, to facilitate the rapid dispatch of control crews and equipment in case of a fire.

PROJECT SPECIFIC REQUIRMENTS

None required.

MITIGATION MEASURES

None required.

CHAPTER 4 MANDATORY FINDINGS OF SIGNIFICANCE

MANDATORY FINDINGS OF SIGNIFICANCE

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
WOULD THE PROJECT:				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal?	☐	☒	☐	☐
b) Have the potential to eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
c) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects, and probably future projects?)	☐	☒	☐	☐
d) Have environmental effects that will cause substantial adverse effects on humans, either directly or indirectly?	☐	☐	☒	☐

DISCUSSION

a) As discussed above, all potential biological related impacts would be less than significant with mitigation, which would include on-site and off-site restoration of wetlands and coastal prairie. The proposed use of raised boardwalks across wetlands would allow for continued migration of some wildlife below the structures and continued growth of sensitive plants and/or wetlands. Marine mammals would be protected from human interactions by installation of grade separated viewing platforms and boardwalks, each with safety railings and/or secondary fencing. Implementation of the above measures, combined with BMP's identified in the Project Requirements Table 1 will result in less than significant impact with mitigation.
b) As identified in Section IV above, the Piedras Blancas area contains known cultural resources that must be protected under Public Resources Code §5024. The PBCT project has been designed to avoid impacts to cultural resources by aligning the trail away from sensitive areas. During grading and excavation activities, the project would be monitored by Native American Tribes which have been consulted during the planning process. All cultural resource BMP's will be adhered to and would reduce impacts to less than significant.
c) The PBCT project is a result of the Caltrans Piedras Blancas Highway Realignment Project which is partially funding the subject trail project. An EIR/EIS was prepared by Caltrans for the highway project. Given the proximity between the two projects and the shared nature of environmental resources, the PBCT could have tiered off the EIR/EIS. However, the limited delineation of highway impacted resources which did not include all potential trail impacts required DPR to separately analyze trail impacts under a separate MND. The impact analysis that follows in the subject MND is similar to that of Caltrans EIR/EIS with a much more limited impacts and scope. The two projects have not been constructed at the same time. Taken together, the cumulative impacts of the two projects, each with appropriate mitigation would result in less than significant impact, with mitigation.
d) Potential impacts identified in this MND are related to sensitive species of flora and fauna. No significant human impacts have been identified. Therefore, the proposed project would not result in environmental effects that cause substantial adverse effects on human beings either directly or indirectly. No Impacts.

CHAPTER 5 SUMMARY OF STANDARD PROJECT REQUIREMENTS & MITIGATION MEASURES

The following standard project requirements (SPR) and mitigation measures will be implemented by DPR as part of the Project.

AESTHETICS

No SPRs or Mitigation Measures required.

AGRICULTURAL AND FOREST RESOURCES

No SPRs or Mitigation Measures required.

AIR QUALITY

SPR AQ-1: Dust Management

a) During dry, dusty conditions, all active construction areas will be lightly sprayed with dust suppressant to reduce dust without causing runoff.
b) All trucks or light equipment hauling soil, sand, or other loose materials on public roads will be covered or required to maintain at least two feet of freeboard.
c) Excavation and grading activities will be suspended when sustained winds exceed 15 miles per hour (mph), instantaneous gusts exceed 25 mph, or when dust occurs from remediation related activities where visible emissions (dust) cannot be controlled by watering or conventional dust abatement controls.

SPR AQ-2: Maintenance of Equipment

- All gasoline-powered equipment will be maintained according to manufacturer's specifications, and in compliance with all State and federal requirements.

BIOLOGICAL RESOURCES

SPR BIOR-1: Environmentally Sensitive Areas

- Environmentally Sensitive Areas will be demarcated, and all work personnel and vehicles/equipment will avoid those areas.

SPR BIOR-2: Environmental Awareness Training

- Environmental training will be provided by a DPR Environmental Scientist for all work personnel prior to the onset of work activities, including staging and stockpiling.

SPR BIOR-3: Best Management Practices

a) Prior to the start of on-site construction 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.

SPR 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.

SPR 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.

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

SPR CULT-1: Cultural Resource Awareness Training

- Prior to the start of ground disturbing activities, cultural resources awareness training will occur for all construction staff. The purpose of the training will be to educate construction personnel as to the potential presence of historic resources and/or archaeological resources within subsurface soils and that DPR staff and tribal monitors may be onsite to inspect for such resources within excavations. Staff will be educated on the appearance and types of objects that may constitute historic or archaeological resources and instructed to refrain from disturbing these resources. The staff will be instructed to halt work in the event any such cultural resources are unearthed or encountered on the surface.

SPR CULT-2: Inadvertent Discovery and Treatment Plan

- If any previously undocumented cultural resources are inadvertently encountered within project excavations (including but not limited to dark soil containing, bone, flaked stone, ground stone, or deposits of historic trash), work within the immediate vicinity of the find will be halted or diverted until the District Archaeologist, or a DPR-qualified cultural resource specialist has evaluated the find and implemented appropriate treatment and regulatory compliance, including contacting a Native American tribal monitor and drafting an Archaeological Treatment Plan.

SPR CULT-3: Human Remains

- In the event human remains are discovered work will cease in the immediate area of the find until further notice and the onsite DPR representative will notify the District Archaeologist or District Superintendent Designee who will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code, and the Native American Heritage Commission (NAHC). Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered. In addition, the DPR district archaeologist will notify the SLO County Environmental Coordinator (or authorized representative) of the discovery.

- The SLO County Coroner will make the determination of whether the human remains are of Native American origin and will contact the NAHC in Sacramento, who will then identify a most likely descendant (MLD). Once appointed, the MLD will then have 24 hours to visit the site, inspect the find and recommend appropriate

treatment and disposition of the remains. Work will not resume in the area of the find until proper disposition is complete (PRC §5097.98). No human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the site prior to determination.

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 tityu tityu yak tiłhini 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.

ENERGY

No SPRs or Mitigation Measures required.

GEOLOGY AND SOILS

SPR GEO-1

- Maintaining Structural Integrity. After a large earthquake event (i.e., magnitude 5.0 or greater within 50 miles of the project site), a qualified professional chosen by DPR will inspect all project structures and features for damage, as soon as is possible after the event. If any structures or features have been damaged, they will be closed to park visitors, volunteers, residents, contractors, and staff.

SPR GEO-2

- Erosion Control and SWPPP: A stormwater pollution prevention plan (SWPPP) will be required for the project and appropriate BMPs will be required to prevent erosion from all applicable areas.

GREENHOUSE GAS EMISSIONS

No SPRs or Mitigation Measures required.

HAZARDS AND HAZARDOUS MATERIALS

SPR HAZ-1: Hazardous Materials Management

a) Prior to the start of on-site construction activities, Contractor will prepare a Spill Prevention and Response Plan part of the Storm Water Pollution Prevention Plan (SWPPP) for RWQCB approval to provide protection to on-site workers,

the public, and the environment from accidental leaks or spills of vehicle fluids or other potential contaminants. This plan will include (but not be limited to);
  - a map that delineates construction staging areas, where refueling, lubrication, and maintenance of equipment will occur;
  - a list of items required in a spill kit on-site that will be maintained throughout the life of the project;
  - procedures for the proper storage, use, and disposal of any solvents or other chemicals used in the restoration process;
  - and identification of lawfully permitted or authorized disposal destinations outside of the project site.

b) Prior to the start of on-site construction activities, Contractor will clean and repair (other than emergency repairs) all equipment outside the project site boundaries.
c) Contractor will designate and/or locate staging and stockpile areas within the existing maintenance yard area or existing roads and campsites to prevent leakage of oil, hydraulic fluids, etc. into the ephemeral creeks, associated wetlands and riparian communities.
d) Prior to the start of on-site construction activities, Contractor will inspect all equipment for leaks and regularly inspect thereafter until equipment is removed from the project site. All contaminated water, sludge, spill residue, or other hazardous compounds will be contained and disposed of outside the boundaries of the site, at a lawfully permitted or authorized destination.

HYDROLOGY AND WATER QUALITY

SPR HYDRO-1: Regulatory Compliance

a) Prior to the start of construction involving ground-disturbing activities, Contractor will prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) for DPR approval that identifies temporary Best Management Practices (BMPs) (e.g., tarping of any stockpiled materials or soil; use of silt fences, straw bale barriers, fiber rolls, etc.) and permanent (e.g., structural containment, preserving or planting of vegetation) for use in all construction areas to reduce or eliminate the discharge of soil, surface water runoff, and pollutants during all excavation, grading, trenching, repaving, or other ground-disturbing activities. The SWPPP will include BMPs for hazardous waste and contaminated soils management and a Spill Prevention and Control Plan, as appropriate.
b) The project will comply with all applicable water quality standards as specified in the Central Coast Basin Plan.

SPR HYDRO-2: Protection of Surface Water

a) If construction activities extend into the rainy season (October through April) or if an un-seasonal storm is anticipated, Contractor will properly winterize the site by covering (tarping) any stockpiled materials or soils and by constructing silt fences,

straw bale barriers, fiber rolls, or other structures around stockpiles and graded areas.

b) All construction activities will be suspended during heavy precipitation events (i.e., at least 1-inch of precipitation in a 24-hour period) or when heavy precipitation events are forecast.
c) All heavy equipment parking, refueling, and service will be conducted within designated areas outside of the 100-year floodplain to avoid water course contamination.
d) Contractor will install appropriate energy dissipaters at water discharge points, as appropriate.

LAND USE AND PLANNING

SPR LAND-1

- The Project will include regulatory, interpretive, and educational signage as standard project requirements.

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 REOURCES

No SPRs or Mitigation Measures required.

NOISE

SPR NOISE-1: Construction Activities

- Internal combustion engines used for project implementation will be equipped with a muffler of a type recommended by the manufacturer. Equipment and trucks used for Project-related activities will utilize the best available noise control techniques (e.g., engine enclosures, acoustically attenuating shields or shrouds, intake silencers, ducts, etc.) whenever necessary.
- Contractor will locate stationary noise sources and staging areas as far from potential sensitive noise receptors, as possible. If they must be located near potential sensitive noise receptors, stationary noise sources will be muffled or shielded, and/or enclosed within temporary sheds.
- Construction activities will generally be limited to the daylight hours, Monday – Friday. If work during weekends or holidays is required, no work will occur on those days before 8:00 a.m. or after 5:00 p.m.
- All motorized construction equipment will be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes.

POPULATION AND HOUSING

No SPRs or Mitigation Measures required.

PUBLIC SERVICES

No SPRs or Mitigation Measures required.

RECREATION

SPR REC-1

- The Project will include handrails along the bridges and vista points, and boardwalks within ESHA to keep people on trail as a standard project requirement.

SPR LAND-1

- The Project will include regulatory, interpretive, and educational signage as standard project requirements.

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

No SPRs or Mitigation Measures required.

TRIBAL CULTURAL RESOURCES

SPR CULT-1: Cultural Resource Awareness Training

- Prior to the start of ground disturbing activities, cultural resources awareness training will occur for all construction staff. The purpose of the training will be to educate construction personnel as to the potential presence of historic resources and/or archaeological resources within subsurface soils and that DPR staff and tribal monitors may be onsite to inspect for such resources within excavations. Staff will be educated on the appearance and types of objects that may constitute historic or archaeological resources and instructed to refrain from disturbing these resources. The staff will be instructed to halt work in the event any such cultural resources are unearthed or encountered on the surface.

SPR CULT-2: Inadvertent Discovery and Treatment Plan

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UTILITES AND SERVICE SYSTEMS

No SPRs or Mitigation Measures required.

WILDFIRE

WLDF-1: Fire Prevention

a) Prior to the start of construction, Contractor will develop a Fire Safety Plan for Cal Fire approval. The plan will include the emergency calling procedures for both the California Department of Forestry and Fire Protection (CDF) and local fire department(s).
b) All heavy equipment will be required to include spark arrestors or turbo chargers (which eliminate sparks in exhaust) and have fire extinguishers on-site.
c) Construction crews will park vehicles 500 feet from flammable material, such as dry grass or brush. At the end of each workday, construction crews will park heavy equipment over a non-combustible surface to reduce the chance of fire.
d) DPR personnel will have the Emergency Command Center contact information on hand, which allows direct contact with CAL FIRE and a centralized dispatch center, to facilitate the rapid dispatch of control crews and equipment in case of a fire.

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CHAPTER 7 REPORT PREPARATION

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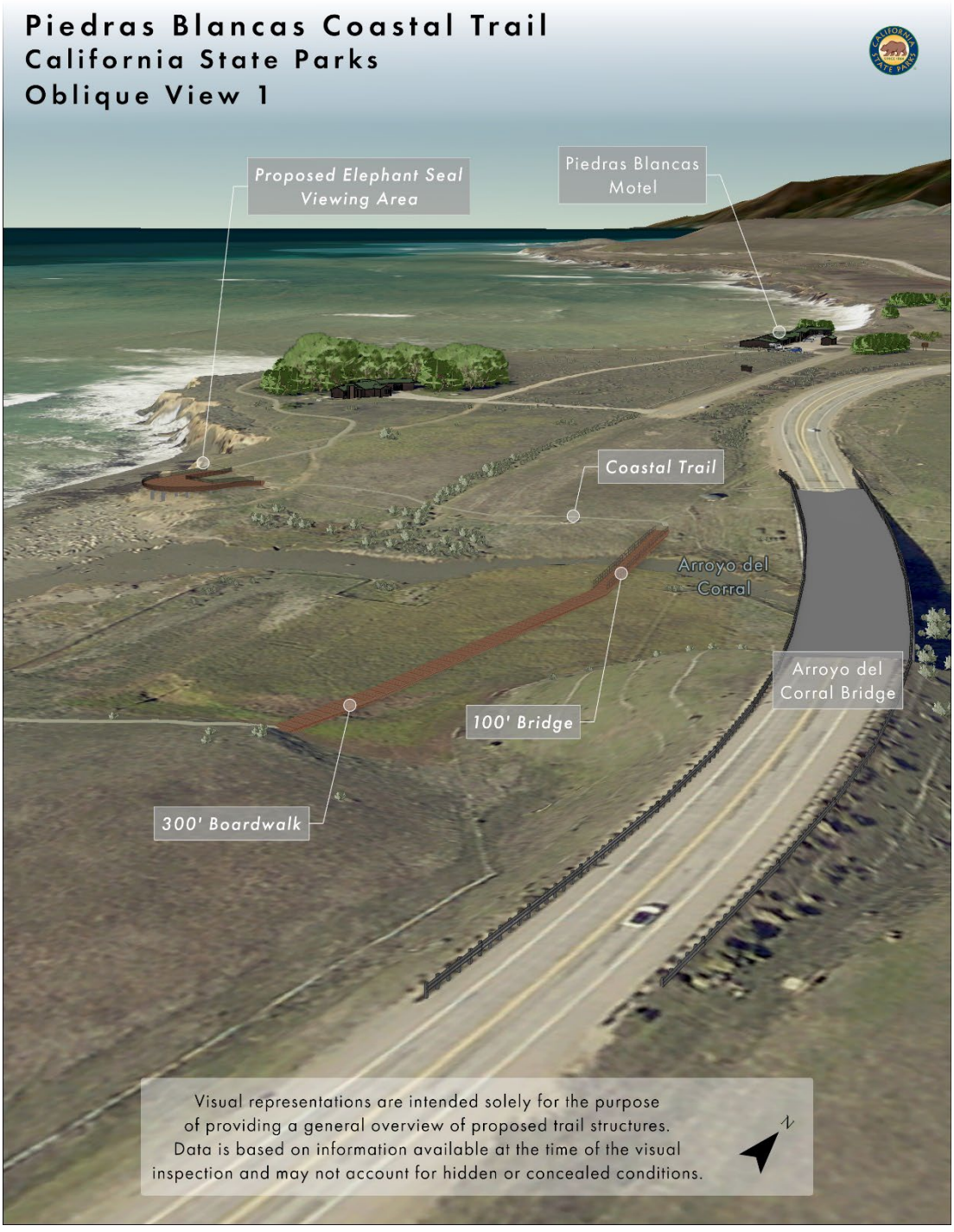
APPENDIX A. TYPICAL CONSTRUCTION PLANS

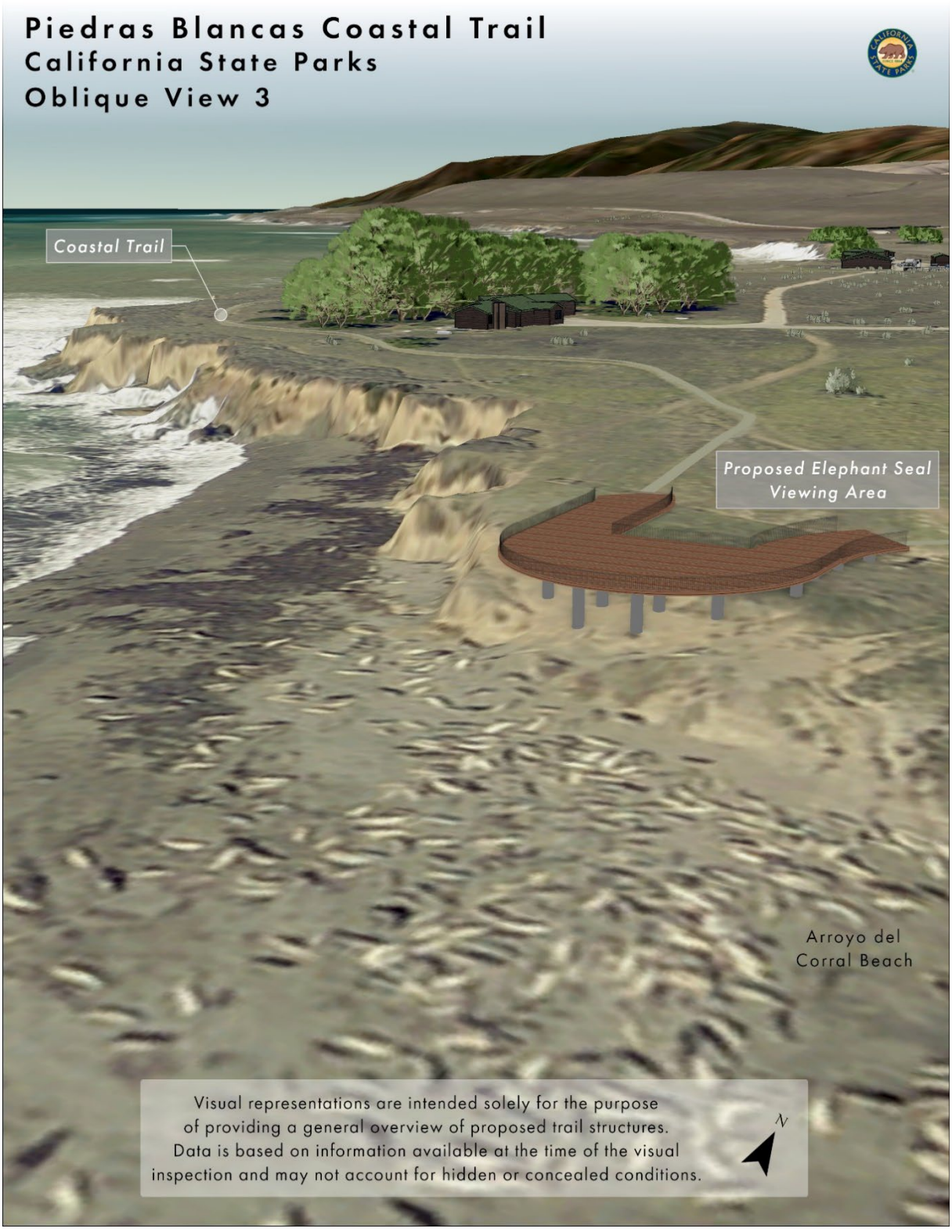
APPENDIX B. CDP 3-13-012

APPENDIX C. PROJECT DESIGN GRAPHICS AND VISUAL ASSESSMENTS

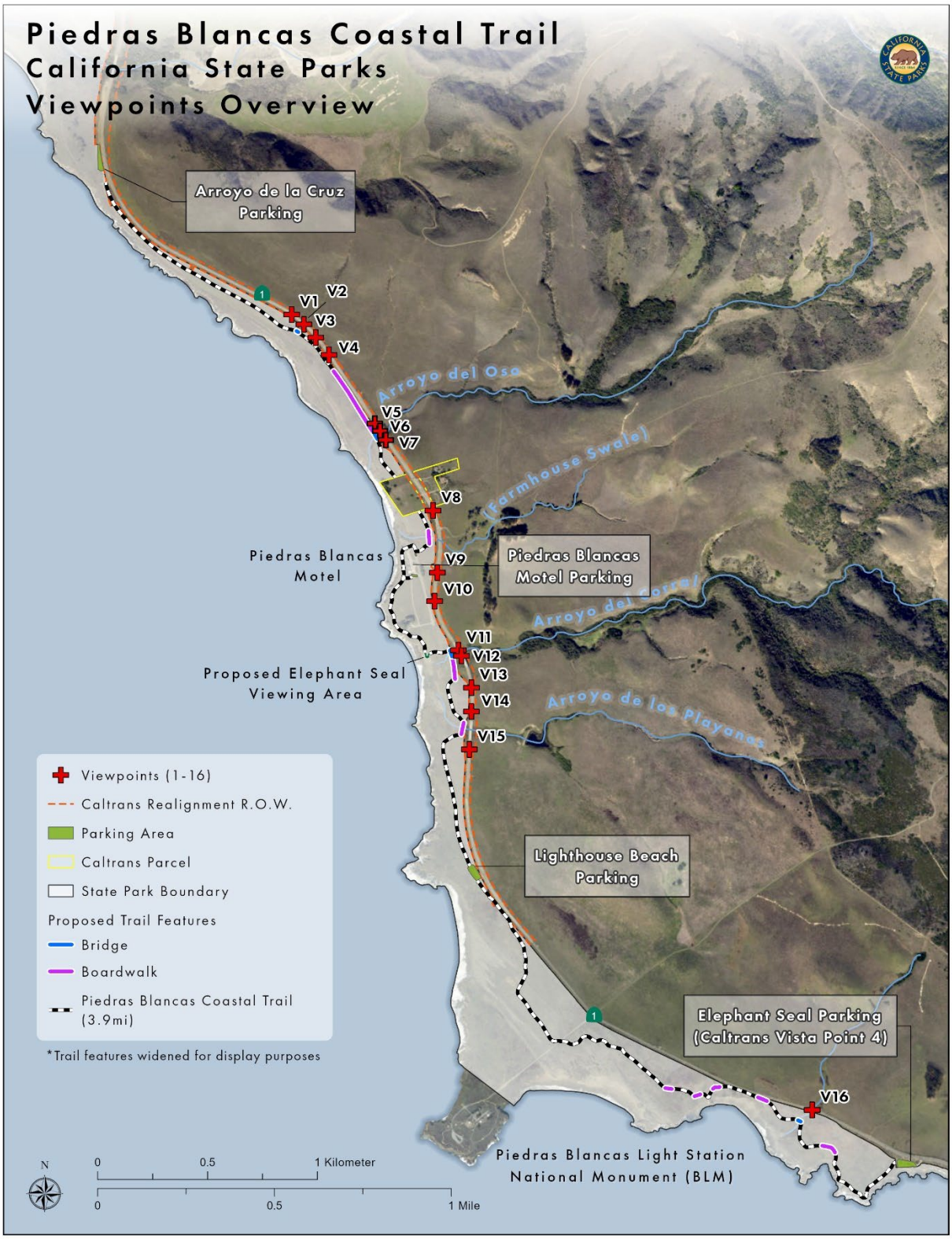


Oblique View 1. Viewshed facing northwest showing proposed elephant seal viewing area and adjacent trail structures at Arroyo del Corral.

Oblique View 2. Viewshed facing south showing Piedras Blancas Motel trailhead and adjacent trail structures.



Oblique View 3. Viewshed facing northwest showing proposed elephant seal viewing area



Overview map showing viewpoint locations 1-16.

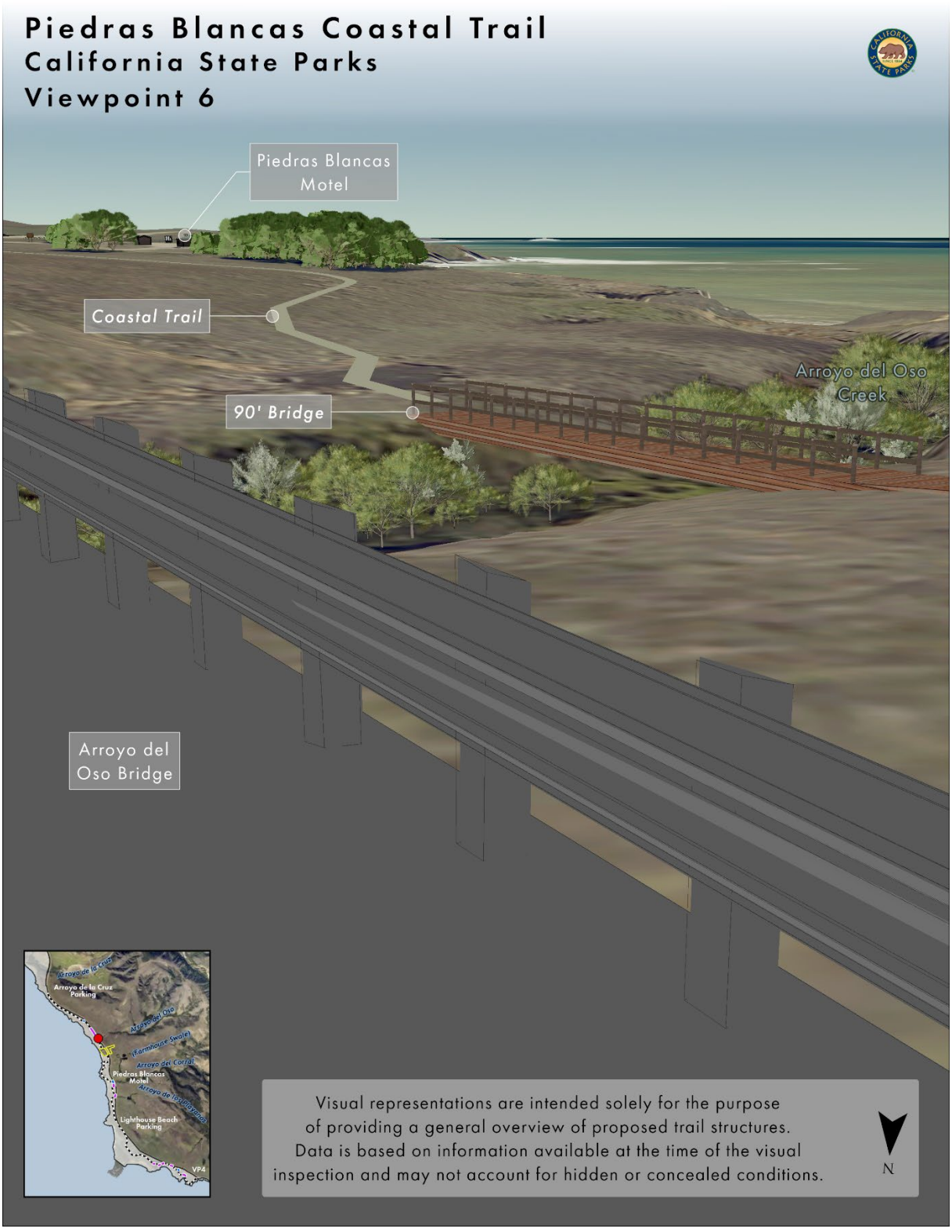
Viewpoint 1. Viewshed from the highway facing southwest looking at Arroyo del Oso and the northernmost bridge.

Viewpoint 2. Viewshed from the highway facing southwest looking at unnamed drainage and the northernmost bridge.

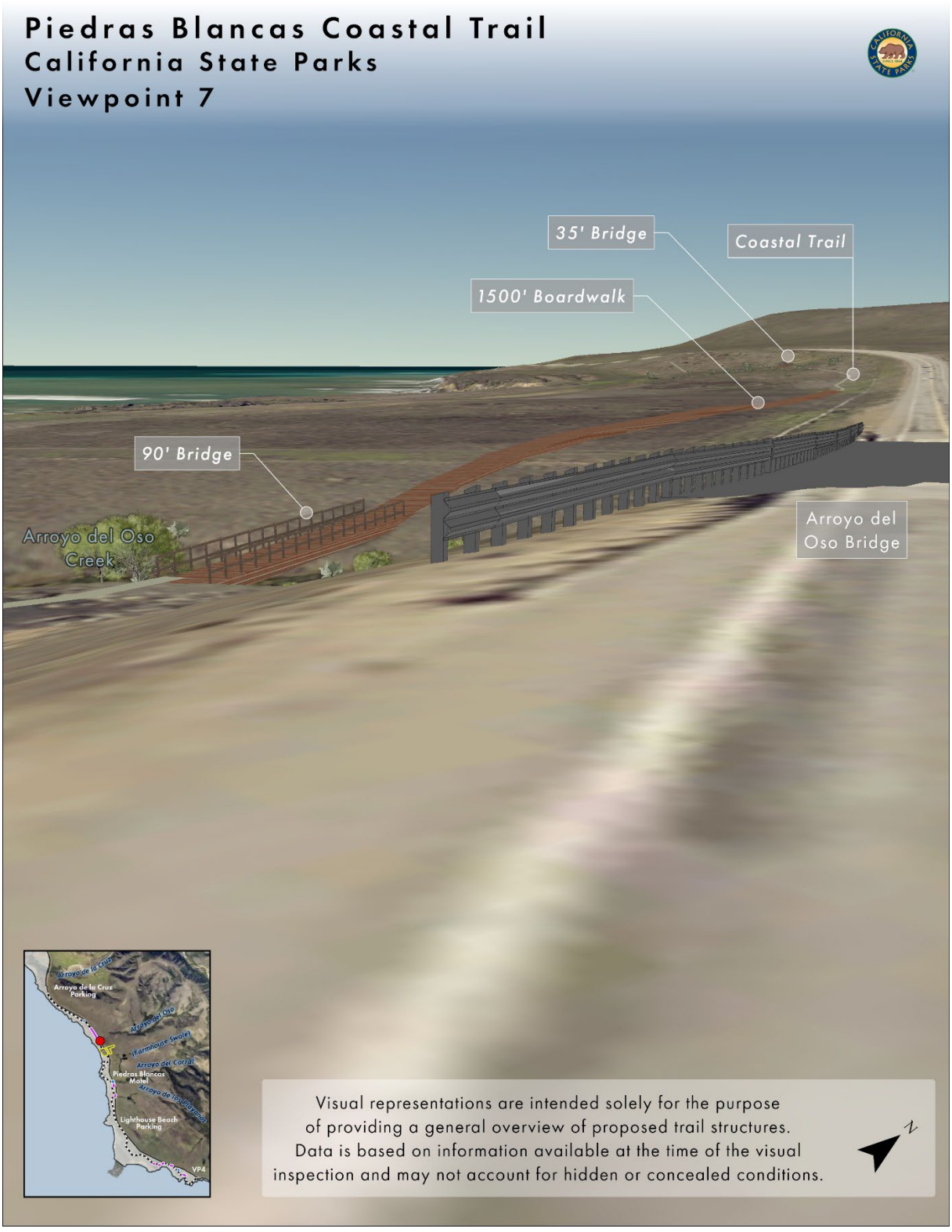
Viewpoint 3. Viewshed facing northwest looking at unnamed drainage and northernmost bridge.

Viewpoint 4. Viewshed facing southwest looking at Arroyo del Oso and adjacent boardwalk.

Viewpoint 5. Viewshed facing southwest looking at Arroyo del Oso and adjacent trail structures.

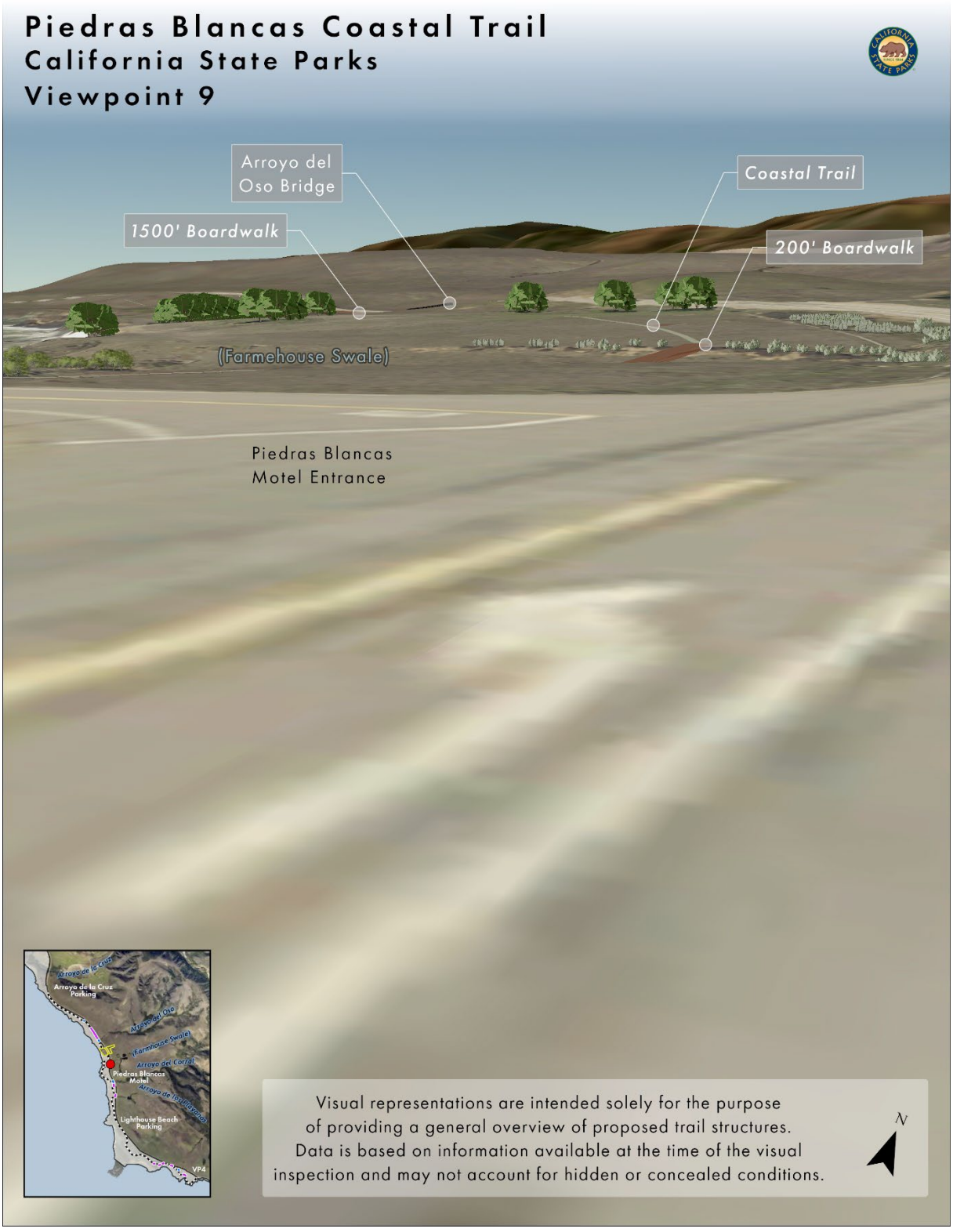


Viewpoint 6. Viewshed facing south showing proposed bridge at Arroyo del Oso and coastal trail.

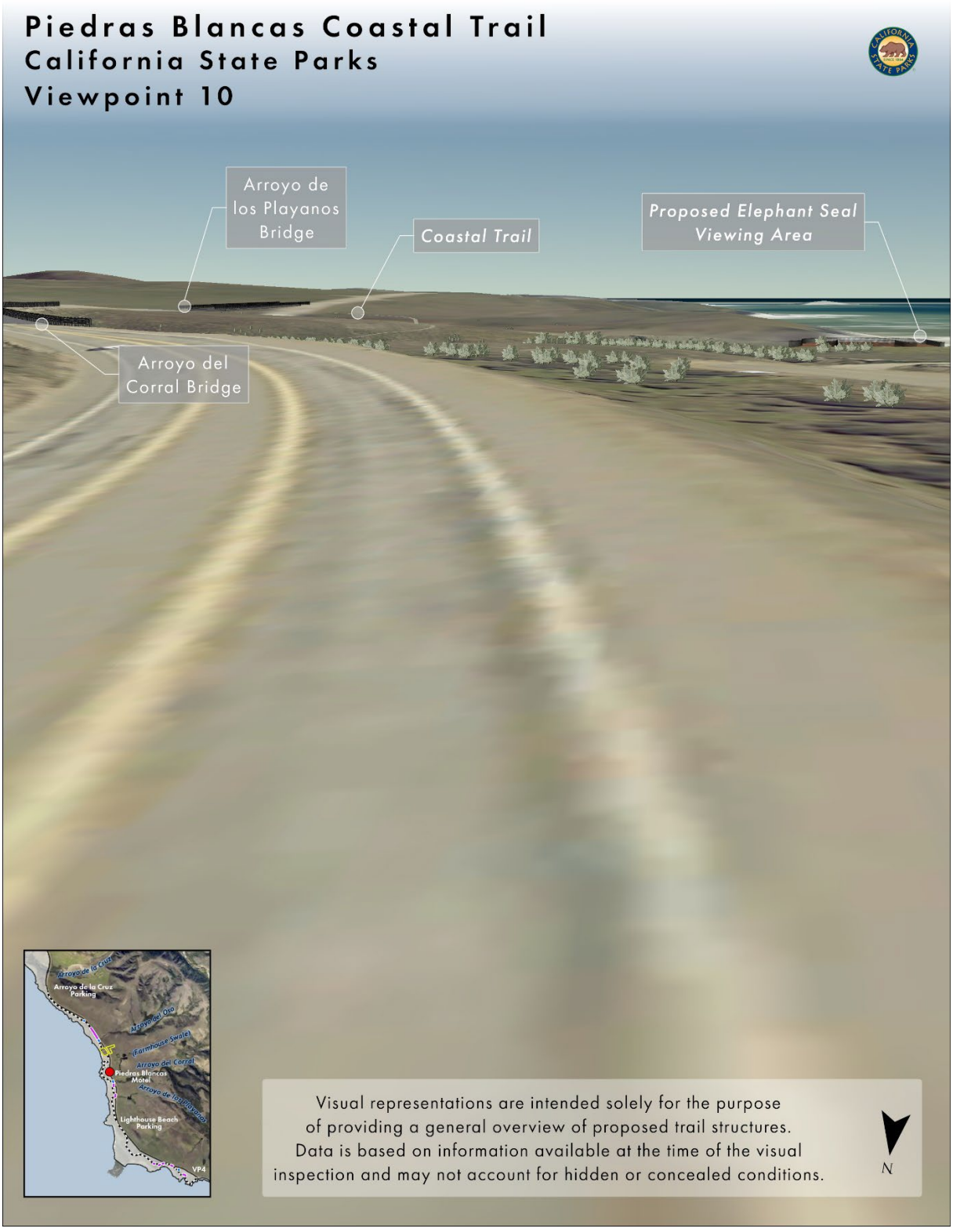


Viewpoint 7. Viewshed facing northwest showing proposed bridge and boardwalk at Arroyo del Oso.

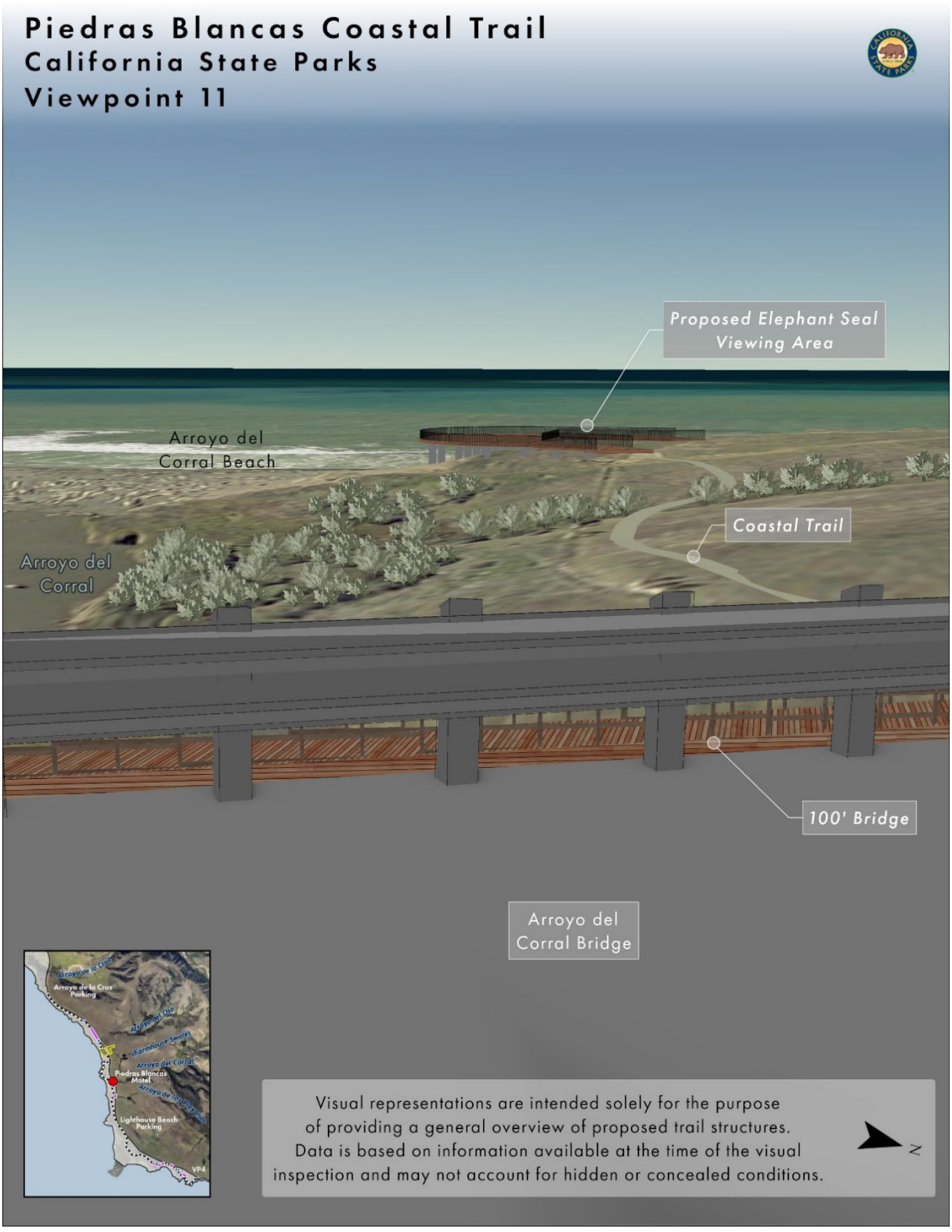
Viewpoint 8. Viewshed facing southwest showing proposed boardwalk at the drainage named Farmhouse Swale.



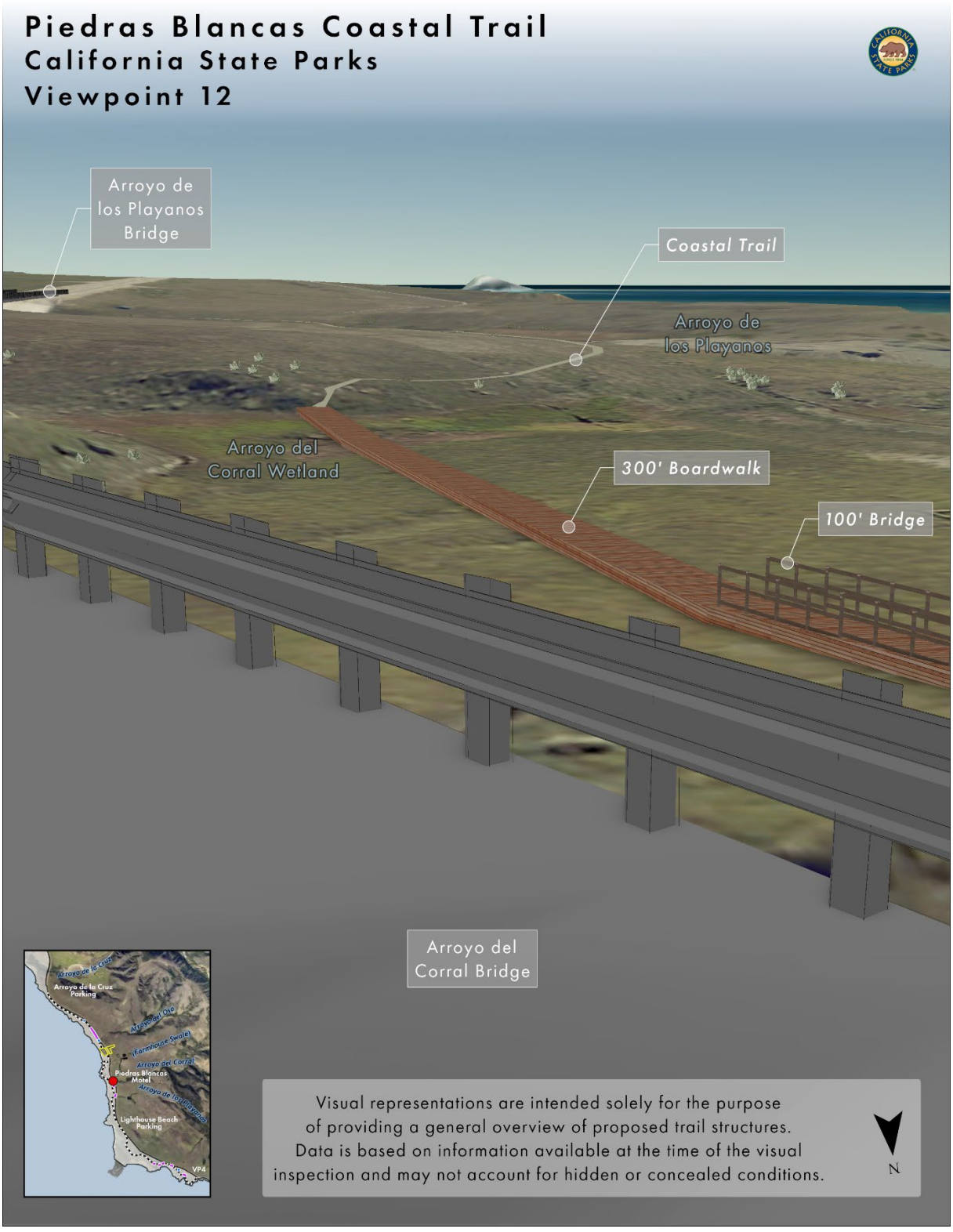
Viewpoint 9. Viewshed facing northwest showing proposed trail structures from the highway entrance at Piedras Blancas Motel.



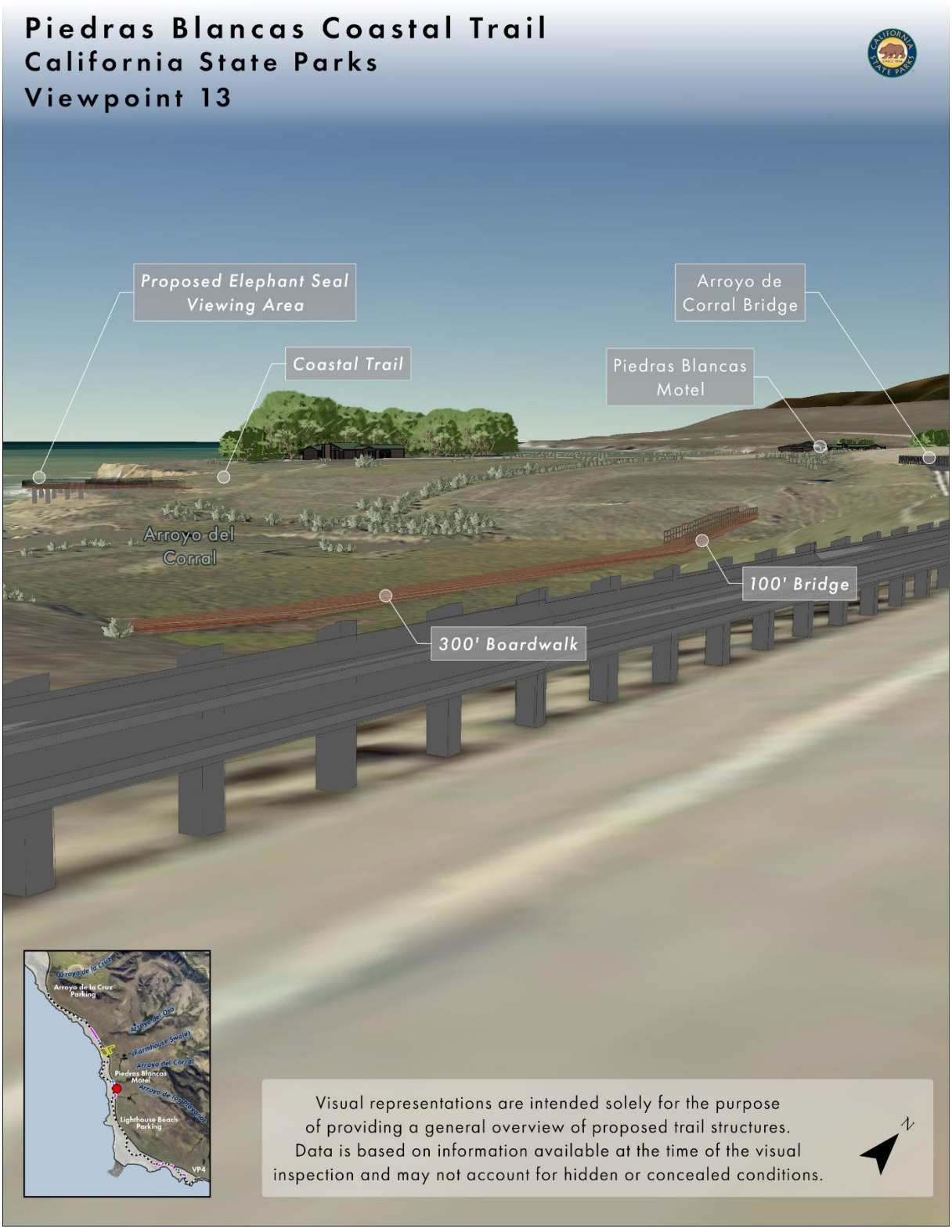
Viewpoint 10. Viewshed facing south showing the proposed viewing area, Arroyo del Corral, and Arroyo de los Playanos. Note the highway embankment angle.



Viewpoint 11. Viewshed facing west showing proposed elephant seal viewing area and coastal trail bridge at Arroyo del Corral.

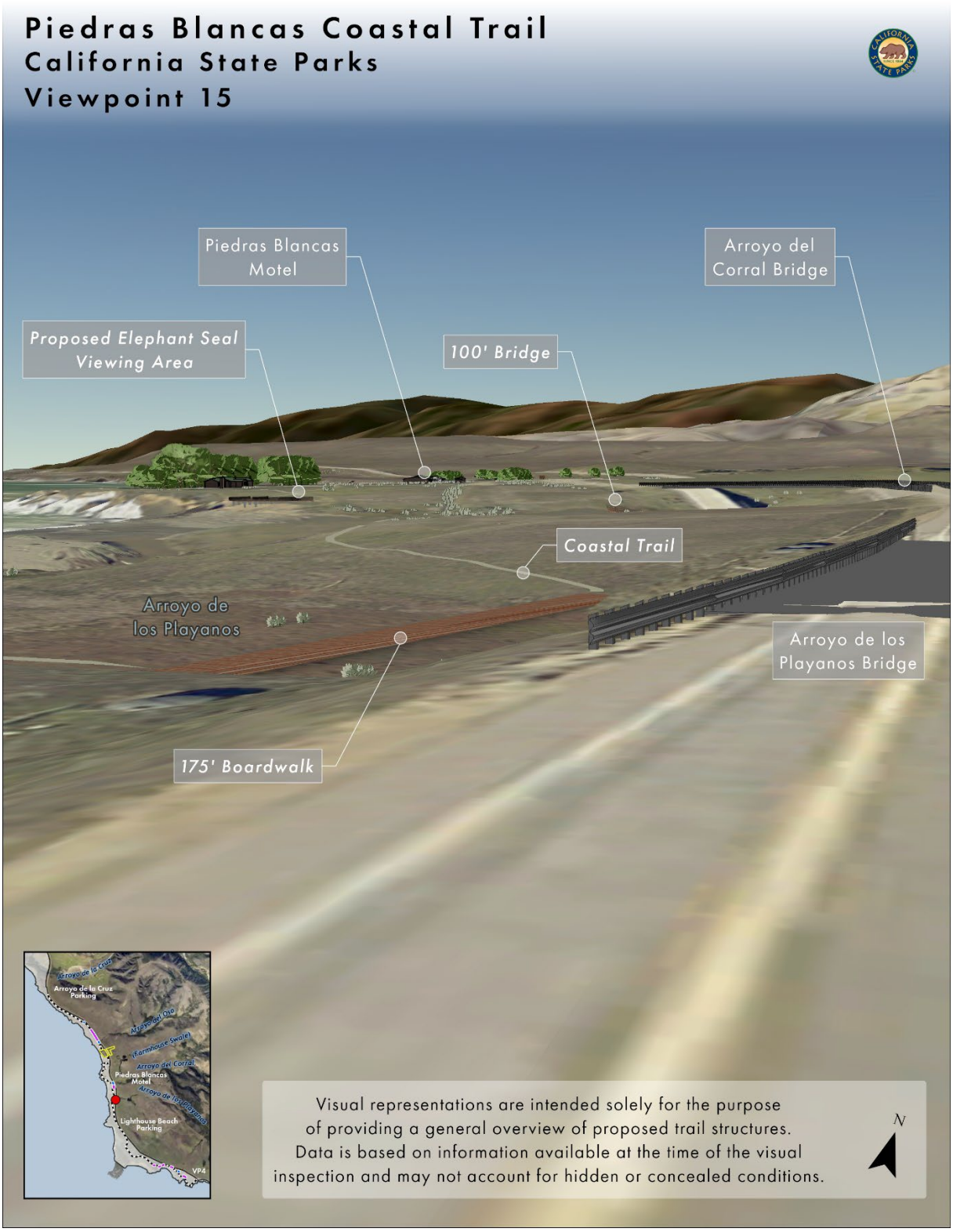


Viewpoint 12. Viewshed facing south showing proposed bridge and boardwalk at Arroyo del Corral.

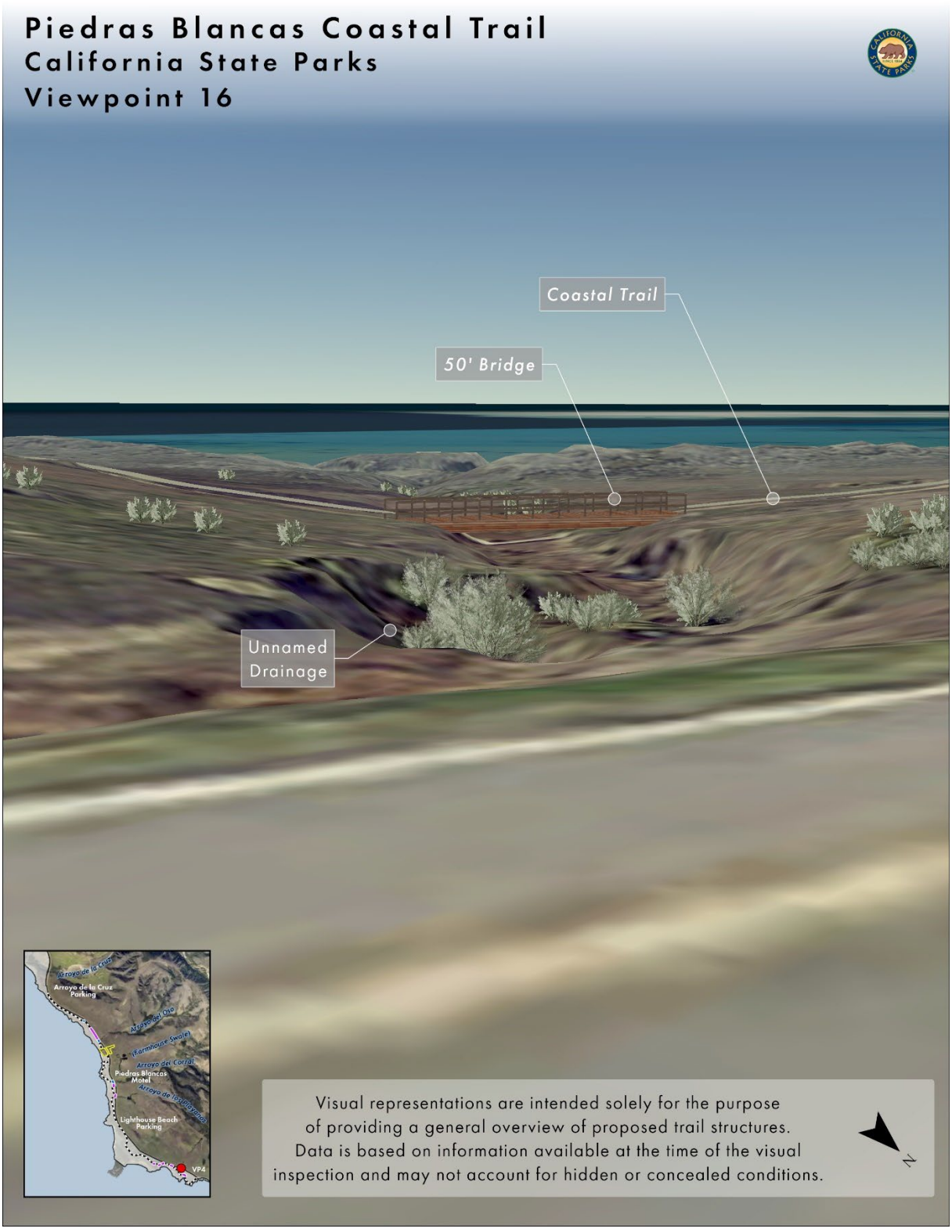


Viewpoint 13. Viewshed facing northwest showing proposed elephant seal viewing area and trail structures at Arroyo del Corral.

Viewpoint 14. Viewshed facing southest showing proposed boardwalk and coastal trail at Arroyo de los Playanos.



Viewpoint 15. Viewshed facing northwest showing view from Arroyo de los Playanos bridge.



Viewpoint 16. Viewshed from the highway facing southwest showing the southernmost proposed bridge at an unnamed drainage.

View of Moonstone Boardwalk, looking west from extension spur towards boardwalk along bluffs.

View of Moonstone Boardwalk, looking northwest from ADA-access at Moonstone Beach Drive.

APPENDIX D. SENSITIVE SPECIES LISTS

Table 1: 9-Quadrat Database Results for Burnett, Burro Mountain, Pico Creek, Piedras Blancas, San Simeon, and Villa Creek USGS 7.5-Minute Quadrats.

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Animals - Amphibians	*Batrachoseps incognitus*	San Simeon slender salamander	None	None	-	-
Animals - Amphibians	*Rana boylii pop. 6*	foothill yellow-legged frog - south coast DPS	Endangered	Endangered	-	-
Animals - Amphibians	*Rana draytonii*	California red-legged frog	Threatened	None	SSC	-
Animals - Amphibians	*Taricha torosa*	Coast Range newt	None	None	SSC	-
Animals - Birds	*Buteo regalis*	ferruginous hawk	None	None	WL	-
Animals - Birds	*Cerorhinca monocerata*	rhinoceros auklet	None	None	WL	-
Animals - Birds	*Fratercula cirrhata*	tufted puffin	None	None	SSC	-
Animals - Birds	*Ptychoramphus aleuticus*	Cassins auklet	None	None	SSC	-
Animals - Birds	*Cypseloides niger*	black swift	None	None	SSC	-
Animals - Birds	*Charadrius nivosus nivosus*	western snowy plover	Threatened	None	SSC	-

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Animals - Birds	*Falco mexicanus*	prairie falcon	None	None	WL	-
Animals - Birds	*Hydrobates homochroa*	ashy storm-petrel	None	None	SSC	-
Animals - Birds	*Larus californicus*	California gull	None	None	WL	-
Animals - Birds	*Pelecanus occidentalis californicus*	California brown pelican	Delisted	Delisted	-	-
Animals - Birds	*Strix occidentalis occidentalis*	California Spotted Owl	None	None	SSC	-
Animals - Fish	*Eucyclogobius newberryi*	tidewater goby	Endangered	None	-	-
Animals - Fish	*Oncorhynchus mykiss irideus*	steelhead - south-central California coast DPS	Threatened	None	-	-
Animals - Insects	*Bombus caliginosus*	obscure bumble bee	None	None	-	-
Animals - Insects	*Euphilotes enoptes smithi*	Smiths blue butterfly	Endangered	None	-	-
Animals - Insects	*Danaus plexippus plexippus*	monarch - California overwintering population	Candidate	None	-	-
Animals - Mammals	*Enhydra lutris nereis*	southern sea otter	Threatened	None	FP	-

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Animals - Mammals	*Taxidea taxus*	American badger	None	None	SSC	-
Animals - Mammals	*Eumetopias jubatus*	Steller sea lion	Delisted	None	-	-
Animals - Mammals	*Antrozous pallidus*	pallid bat	None	None	SSC	-
Animals - Mammals	*Corynorhinus townsendii*	Townsends big-eared bat	None	None	SSC	-
Animals - Mammals	*Myotis evotis*	long-eared myotis	None	None	-	-
Animals - Mammals	*Myotis thysanodes*	fringed myotis	None	None	-	-
Animals - Mammals	*Myotis volans*	long-legged myotis	None	None	-	-
Animals - Mammals	*Myotis yumanensis*	Yuma myotis	None	None	-	-
Animals - Mollusks	*Haliotis cracherodii*	black abalone	Endangered	None	-	-
Animals - Reptiles	*Emys marmorata*	western pond turtle	None	None	SSC	-
Animals - Reptiles	*Thamnophis hammondii*	two-striped gartersnake	None	None	SSC	-
Community - Terrestrial	Alkali Seep	Alkali Seep	None	None	-	-
Community - Terrestrial	Central Maritime Chaparral	Central Maritime Chaparral	None	None	-	-

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Community - Terrestrial	Monterey Pine Forest	Monterey Pine Forest	None	None	-	-
Community - Terrestrial	Valley Oak Woodland	Valley Oak Woodland	None	None	-	-
Plants - Vascular	*Hooveria purpurea var. purpurea*	Santa Lucia purple amole	Threatened	None	-	1B.1
Plants - Vascular	*Allium hickmanii*	Hickmans onion	None	None	-	1B.2
Plants - Vascular	*Lomatium parvifolium*	small-leaved lomatium	None	None	-	4.2
Plants - Vascular	*Perideridia gairdneri ssp. gairdneri*	California Gairdners yampah	None	None	-	4.2
Plants - Vascular	*Perideridia pringlei*	adobe yampah	None	None	-	4.3
Plants - Vascular	*Sanicula hoffmannii*	Hoffmanns sanicle	None	None	-	4.3
Plants - Vascular	*Sanicula maritima*	adobe sanicle	None	Rare	-	1B.1
Plants - Vascular	*Baccharis plummerae ssp. glabrata*	San Simeon baccharis	None	None	-	1B.2
Plants - Vascular	*Calycadenia micrantha*	small-flowered calycadenia	None	None	-	1B.2
Plants - Vascular	*Calycadenia villosa*	dwarf calycadenia	None	None	-	1B.1

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Plants - Vascular	*Cirsium occidentale var. compactum*	compact cobwebby thistle	None	None	-	1B.2
Plants - Vascular	*Deinandra paniculata*	paniculate tarplant	None	None	-	4.2
Plants - Vascular	*Erigeron conditii*	Condits fleabane daisy	None	None	-	1B.1
Plants - Vascular	*Erigeron sanctarum*	saints daisy	None	None	-	4.2
Plants - Vascular	*Lasthenia californica ssp. bakeri*	Bakers goldfields	None	None	-	1B.2
Plants - Vascular	*Lasthenia californica ssp. macrantha*	perennial goldfields	None	None	-	1B.2
Plants - Vascular	*Lasthenia leptalea*	Salinas Valley goldfields	None	None	-	4.3
Plants - Vascular	*Layia heterotricha*	pale-yellow layia	None	None	-	1B.1
Plants - Vascular	*Lessingia tenuis*	spring lessingia	None	None	-	4.3
Plants - Vascular	*Microseris paludosa*	marsh microseris	None	None	-	1B.2
Plants - Vascular	*Monolopia gracilens*	woodland woollythreads	None	None	-	1B.2
Plants - Vascular	*Senecio aphanactis*	chaparral ragwort	None	None	-	2B.2

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Plants - Vascular	*Senecio astephanus*	San Gabriel ragwort	None	None	-	4.3
Plants - Vascular	*Syntrichopappus lemmonii*	Lemmons syntrichopappus	None	None	-	4.3
Plants - Vascular	*Amsinckia douglasiana*	Douglas fiddleneck	None	None	-	4.2
Plants - Vascular	*Cryptantha rattanii*	Rattans cryptantha	None	None	-	4.3
Plants - Vascular	*Plagiobothrys uncinatus*	hooked popcornflower	None	None	-	1B.2
Plants - Vascular	*Streptanthus albidus ssp. peramoenus*	most beautiful jewelflower	None	None	-	1B.2
Plants - Vascular	*Tropidocarpum capparideum*	caper-fruited tropidocarpum	None	None	-	1B.1
Plants - Vascular	*Chenopodium littoreum*	coastal goosefoot	None	None	-	1B.2
Plants - Vascular	*Calystegia collina ssp. venusta*	South Coast Range morning-glory	None	None	-	4.3
Plants - Vascular	*Calystegia subacaulis ssp. episcopalis*	Cambria morning-glory	None	None	-	4.2
Plants - Vascular	*Cuscuta pacifica var. papillata*	Mendocino dodder	None	None	-	1B.2
Plants - Vascular	*Dudleya blochmaniae*	Blochmans dudleya	None	None	-	1B.1

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
	ssp. blochmaniae					
Plants - Vascular	*Carex obispoensis*	San Luis Obispo sedge	None	None	-	1B.2
Plants - Vascular	*Arctostaphylos cruzensis*	Arroyo de la Cruz manzanita	None	None	-	1B.2
Plants - Vascular	*Arctostaphylos hookeri ssp. hearstiorum*	Hearsts manzanita	None	Endangered	-	1B.2
Plants - Vascular	*Arctostaphylos hookeri ssp. hearstiorum*	Hearsts manzanita	None	Endangered	-	1B.2
Plants - Vascular	*Arctostaphylos hooveri*	Hoovers manzanita	None	None	-	4.3
Plants - Vascular	*Arctostaphylos obispoensis*	Bishop manzanita	None	None	-	4.3
Plants - Vascular	*Astragalus nuttallii var. nuttallii*	ocean bluff milk-vetch	None	None	-	4.2
Plants - Vascular	*Hosackia gracilis*	harlequin lotus	None	None	-	4.2
Plants - Vascular	*Lupinus albifrons var. abramsii*	Abrams lupine	None	None	-	3.2
Plants - Vascular	*Juncus acutus ssp. leopoldii*	southwestern spiny rush	None	None	-	4.2
Plants - Vascular	*Juncus luciensis*	Santa Lucia dwarf rush	None	None	-	1B.2

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Plants - Vascular	*Clinopodium mimuloides*	monkey-flower savory	None	None	-	4.2
Plants - Vascular	*Clinopodium mimuloides*	monkey-flower savory	None	None	-	4.2
Plants - Vascular	*Monardella palmeri*	Palmers monardella	None	None	-	1B.2
Plants - Vascular	*Monardella sinuata ssp. sinuata*	southern curly-leaved monardella	None	None	-	1B.2
Plants - Vascular	*Pogogyne clareana*	Santa Lucia mint	None	Endangered	-	1B.2
Plants - Vascular	*Calochortus clavatus var. clavatus*	club-haired mariposa-lily	None	None	-	4.3
Plants - Vascular	*Calochortus clavatus var. recurvifolius*	Arroyo de la Cruz mariposa-lily	None	None	-	1B.2
Plants - Vascular	*Calochortus fimbriatus*	late-flowered mariposa-lily	None	None	-	1B.3
Plants - Vascular	*Fritillaria agrestis*	stinkbells	None	None	-	4.2
Plants - Vascular	*Fritillaria ojaiensis*	Ojai fritillary	None	None	-	1B.2
Plants - Vascular	*Fritillaria viridea*	San Benito fritillary	None	None	-	1B.2
Plants - Vascular	*Malacothamnus davidsonii*	Davidsons bush-mallow	None	None	-	1B.2

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Plants - Vascular	*Malacothamnus palmeri var. palmeri*	Santa Lucia bush-mallow	None	None	-	1B.2
Plants - Vascular	*Sidalcea hickmanii ssp. hickmanii*	Hickmans checkerbloom	None	None	-	1B.3
Plants - Vascular	*Toxicoscordion fontanum*	marsh zigadenus	None	None	-	4.2
Plants - Vascular	*Calandrinia breweri*	Brewers calandrinia	None	None	-	4.2
Plants - Vascular	*Calyptridium parryi var. hesseae*	Santa Cruz Mountains pussypaws	None	None	-	1B.1
Plants - Vascular	*Clarkia lewisii*	Lewis clarkia	None	None	-	4.3
Plants - Vascular	*Aphyllon robbinsii*	Robbins broomrape	None	None	-	1B.1
Plants - Vascular	*Castilleja ambigua var. heckardii*	Heckards owls-clover	None	None	-	1B.1
Plants - Vascular	*Castilleja densiflora var. obispoensis*	San Luis Obispo owls-clover	None	None	-	1B.2
Plants - Vascular	*Castilleja latifolia*	Monterey Coast paintbrush	None	None	-	4.3
Plants - Vascular	*Pedicularis rigginsiae*	Arroyo de la Cruz lousewort	None	None	-	1B.1

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Plants - Vascular	*Erythranthe hardhamiae*	Santa Lucia monkeyflower	None	None	-	1B.1
Plants - Vascular	*Mimulus subsecundus*	one-sided monkeyflower	None	None	-	4.3
Plants - Vascular	*Abies bracteata*	bristlecone fir	None	None	-	1B.3
Plants - Vascular	*Pinus radiata*	Monterey pine	None	None	-	1B.1
Plants - Vascular	*Collinsia antonina*	San Antonio collinsia	None	None	-	1B.2
Plants - Vascular	*Muhlenbergia utilis*	aparejo grass	None	None	-	2B.2
Plants - Vascular	*Eriastrum luteum*	yellow-flowered eriastrum	None	None	-	1B.2
Plants - Vascular	*Chorizanthe breweri*	Brewers spineflower	None	None	-	1B.3
Plants - Vascular	*Chorizanthe douglasii*	Douglas spineflower	None	None	-	4.3
Plants - Vascular	*Chorizanthe palmeri*	Palmers spineflower	None	None	-	4.2
Plants - Vascular	*Chorizanthe pungens var. pungens*	Monterey spineflower	Threatened	None	-	1B.2
Plants - Vascular	*Systenotheca vortriedei*	Vortriedes spineflower	None	None	-	4.3
Plants - Vascular	*Aspidotis carlotta-halliae*	Carlotta Halls lace fern	None	None	-	4.2

Species Type	Scientific Name	Common Name	Federal Status	State Status	CDFW Status	CA Rare Plant Rank
Plants - Vascular	*Aspidotis carlotta-halliae*	Carlotta Halls lace fern	None	None	-	4.2
Plants - Vascular	*Delphinium parryi ssp. blochmaniae*	dune larkspur	None	None	-	1B.2
Plants - Vascular	*Ceanothus hearstiorum*	Hearsts ceanothus	None	Rare	-	1B.2
Plants - Vascular	*Ceanothus maritimus*	maritime ceanothus	None	Rare	-	1B.2
Plants - Vascular	*Horkelia cuneata var. sericea*	Kelloggs horkelia	None	None	-	1B.1
Plants - Vascular	*Horkelia yadonii*	Santa Lucia horkelia	None	None	-	4.2
Plants - Vascular	*Galium californicum ssp. luciense*	Cone Peak bedstraw	None	None	-	1B.3
Plants - Vascular	*Galium clementis*	Santa Lucia bedstraw	None	None	-	1B.3
Plants - Vascular	*Galium hardhamiae*	Hardhams bedstraw	None	None	-	1B.3
Plants - Vascular	*Bloomeria humilis*	dwarf goldenstar	None	Rare	-	1B.2
Plants - Vascular	*Triteleia ixioides ssp. cookii*	Cooks triteleia	None	None	-	1B.3

Sources

The list of species addressed in this table was generated through database queries of the California Natural Diversity Data Base Rarefind 5 Program (CDFW, 2023), the California Native Plant Society Rare Plant Inventory (CNPS, 2023), and the United States Fish and Wildlife Service IPAC Consultation (USFWS, 2023). At a minimum, all searches used the Burnett Peak, Burro Mountain, Pico Creek, Piedras Blancas, San Simeon, and Villa Creek United States Geological Survey (USGS) 7.5-minute quadrangles.

Legend

Federal Status

FE Endangered. Species in danger of extinction throughout all or a significant portion of its range.
FT Threatened. Species likely to become endangered within the foreseeable future.
C Candidate being considered for federal listing.

California State Status

FP Fully protected species defined in the State of California under Section 3511 of the Fish and Game Code.
SE State Endangered. Species whose continued existence in California is in jeopardy.
ST State Threatened. Species is likely to become endangered within the foreseeable future.
SR State Rare.
SSC California Department of Fish and Wildlife (CDFW) species of special concern.
WL CDFW Watch List.

CNPS Status

1B.1 Plants seriously endangered in California.
1B.2 Plants fairly endangered in California and elsewhere.
1B.3 Rare, threatened, or endangered in California and elsewhere.
4.2 Limited distribution.

APPENDIX E. ARCHAEOLOGICAL RESOURCES

Confidential Appendix E available upon authorized request

APPENDIX F. TRIBAL CULTURAL RESOURCES

Confidential Appendix F available upon authorized request

APPENDIX G. CONCEPTUAL MITIGATION MONITORING & REPORTING PLAN