

**CALIFORNIA COASTAL COMMISSION**

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**October 28, 2024**

Katie Drexhage, Senior Environmental Scientist  
San Luis Obispo Coast District  
California State Parks

**Subject: Initial Study/Mitigated Negative Declaration (IS/MND) for the Piedras Blancas California Coastal Trail (CCT) Project**

Dear Ms. Drexhage:

Thank you for the opportunity to comment on the IS/MND for the Piedras Blancas CCT Project. Building the CCT along the Piedras Blancas coastline has been a long-held vision of both our agencies, along with the Coastal Conservancy, Caltrans, and other partners. Releasing the MND is a significant milestone toward realizing that vision. I also appreciate your team meeting with me last month to walk through the MND and share additional information about the project. As I mentioned during our meeting, my intention is that these comments will help focus our follow-up conversations, so that we may talk through the points below and incorporate the results of those conversations into the final project plans.

As the MND correctly recognizes, construction of much of the CCT through Piedras Blancas has already been authorized under the Coastal Act by CDP 3-13-012, which the Coastal Commission approved and issued to Caltrans in 2014. Specifically, this authorization covers approximately 3 of the 4 miles of trail proposed in the MND, from the Arroyo de la Cruz parking lot to the Lighthouse Beach parking lot. The CDP does not, at least currently, authorize the southernmost mile of trail from the Lighthouse Beach Parking lot to the Elephant Seal Vista Point parking lot.

As I mentioned during our recent meeting, there is flexibility in how the southernmost mile could be authorized under the Coastal Act. State Parks could apply to San Luis Obispo County for a separate CDP authorizing construction of that mile of trail consistent with the policies of the County's LCP. We observe that the MND identifies this as Parks' intention, and we have no objection to this approach. As another option, Parks would be welcome to coordinate with Commission staff and Caltrans to amend CDP 3-13-012 to add the fourth mile of trail into the scope of that permit. Caltrans would be the entity that would initiate such a permit amendment (as the permit holder), but we do not believe this approach would be difficult to accomplish. It is worth noting too that having the Commission authorize the additional mile of trail via a permit amendment could make for a shorter permitting process, as the County's CDP for the southernmost segment of trail could be appealed to the Commission, which can be a lengthy process. Ultimately, we defer to State Parks' preference, but we wanted to present both options.

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As for the other three miles of trail, the requirements that must be met in order for the project to comply with the Coastal Act are different than usual because construction of this segment of CCT is already permitted. Ordinarily, when State Parks releases a CEQA document for a proposed project, our comments and interagency coordination are focused on how to ensure the project is consistent with the policies of the Coastal Act such that it can be permitted. Here, by contrast, construction of the CCT through the Piedras Blancas has already been permitted, and the permit and connected documents (i.e., the Cooperative Agreement between Parks and Caltrans) establish standards for building the trail consistent with that authorization. Therefore, our comments and subsequent coordination will be guided more immediately by those standards rather than the Coastal Act itself.

To that end, enclosed with this letter is a copy of the Special Conditions for CDP 3-13-012, as amended, for your reference. I would draw your attention to Special Condition 5, which contains the majority of the requirements related to construction of the CCT, which were incorporated into the 2017 Cooperative Agreement between State Parks and Caltrans. These requirements lay a framework for State Parks and the Coastal Commission to coordinate in completing the final design of the CCT. Specifically, Special Condition 5 and the Cooperative Agreement state that State Parks will submit the Final CCT Plans to Commission staff for review and Executive Director approval prior to commencing construction. Please note that Special Condition 5 requires the Final CCT Plans to, among other things:

- Be in substantial conformance with the conceptual plans that were developed collaboratively by our agencies in 2013 and included as Exhibit 4 of CDP 3-13-012.
- Site and design the trail to provide the impression of a natural surface path with curvilinear features, a compacted but unpaved surface, and widths generally not exceeding 6 feet.
- Describe how State Parks will manage the CCT system and parking areas, including but not limited to:
  - Identifying any planned public uses of the Piedras Blancas Motel site;
  - Specifying that the CCT is available for bicyclist and pedestrian use, free of charge, 365 days a year (except for temporary hazards closings);
  - Providing appropriate protection for elephant seals; and
  - Identifying the location and contents of all signs and other project elements that will be used to facilitate, manage, and provide public access to the CCT, including educational displays, interpretive signage, etc.

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Special Condition 5 enumerates other requirements beyond these, but for the purposes of this letter we wish to highlight the preceding selection for your awareness.

Based on the information in the MND and the construction drawings provided by your team, it appears that, with the exception of the proposed elephant seal viewing platform, all project elements within the project area authorized by CDP 3-13-012 are on track to comply with the standards outlined in Special Condition 5 of the CDP. We do recognize that the currently proposed trail project does differ from the 2014 conceptual proposal in multiple respects, including deviating from the conceptual trail alignment in several locations, increasing the length of several previously contemplated bridges, and adding a boardwalk along the former Sani and Welsh properties (to be constructed by Caltrans). We appreciate the information that your team has shared to help us understand the rationale for these changes, and we recognize that all of the changes are minor and intended to protect and enhance coastal resources and public coastal access, and thus are in substantial conformance with the original conceptual plans.

As mentioned previously, the one project feature that does go beyond the scope of the development authorized by CDP 3-13-012 is the elephant seal viewing platform proposed just downcoast of the Piedras Blancas Motel site. To be clear, Commission staff do not object to the construction of facilities at this location to help manage public viewing of the elephant seals at the Arroyo del Corral beach. We recognize that the elephant seal population in the vicinity of Piedras Blancas is growing and frequenting more beaches in greater numbers. We share your enthusiasm for the fact that the seals help drive public interest in visiting Hearst San Simeon State Park and this stretch of coast more broadly. We also share your belief that, given elephant seals' protected status as well as the potential for human-seal conflicts, the public's experience of areas commonly harboring elephant seals should be appropriately managed to ensure the public can safely and responsibly view the seals.

At the same time, we are mindful of the highly erosive nature of the bluffs along this stretch of coast, which motivated the realignment of the highway and now necessitates the proposed trail alignment to be revised inland in several locations. The need for such relocations of public infrastructure will only continue and accelerate. We are also aware, as we know you are too, of the visual sensitivity of this coastal landscape. The currently proposed viewing platform, which would extend beyond the bluff edge and be supported by piles driven into the bluff face, is in tension with these concerns. We anticipate that such a structure would require significant armoring in the future in order to continue to exist. Such armoring would exacerbate erosion of the adjacent bluffs (as well as drive up long-term project costs) and would not be something the Commission could approve under the Coastal Act. By extending beyond the bluff edge, the platform also intrudes into the visual profile of the bluffs and Arroyo del Corral.

For these reasons, we suggest that State Parks replace this project feature with the boardwalk-and-fence design currently used at the existing elephant seal viewing facilities downcoast, and locate the facility entirely on the blufftop. This scaled-back design would still provide the public with a high-quality, ADA-accessible surface on

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which to view the seals at this location, but would do so with no need for driven piles, with decreased visual impact, and likely at a lower up-front cost. Such a facility could also be relocated inland (in response to future erosion) with greater ease and fewer impacts and costs. Moreover, such a boardwalk-and-fence structure would be within the scope of the authorization provided by CDP 3-13-012—see Special Condition 1(e), which lists “boardwalks” among the authorized trail structures—thus avoiding the need for any additional authorization under the Coastal Act.

Looking ahead, we would like to stay in close coordination with your team as you continue to develop and refine the proposed project. In line with the comments above, we propose focusing this coordination on **(1) confirming how State Parks would prefer to pursue authorization under the Coastal Act for the southern-most mile of trail, (2) revising the proposed elephant seal viewing facility at Arroyo del Corral, and (3) ensuring a shared understanding of the requirements of Special Condition 5 as it relates to the contents of the Final CCT Plans to be submitted to the Commission.** Close coordination on these items will facilitate our Executive Director’s eventual review and approval of the Final CCT Plans and will minimize the risk of outside legal challenge, both of which will help State Parks commence construction without delay. I look forward to continuing to work closely with your team.

Sincerely,



Sean Drake  
Legislative Program Manager  
California Coastal Commission

Copy: Meg Henry, Project Manager, Caltrans District 5  
Tim Duff, Project Manager, State Coastal Conservancy  
Phil Hammer, Senior Environmental Scientist, Central Coast RWQCB  
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