INITIAL STUDY /

NEGATIVE DECLARATION

OFFICE MODULAR INSTALLATION, RELOCATION, AND REPLACEMENT PROJECT

Office Modular example at Morro Bay State Park

June 2023

State of California

California State Parks

NEGATIVE DECLARATION

PROJECT: Office Modular Installation, Relocation, and Replacement Project

LEAD AGENCY: California State Parks

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

- Online at: https://www.parks.ca.gov/?page_id=982

- San Luis Obispo Coast District Office
  California State Parks
  750 Hearst Castle Rd
  San Simeon, CA 93452

- 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 demolition of the existing office modulars at the Hearst Castle Guide Complex, the District Office Complex, and several storage structures at San Simeon Creek Campground with replacement by new modular buildings and construction of a new modular office at Elephant Hill next to Hearst Castle. In addition, the modular installations will include upgraded electrical services, new fire hydrants and sprinklers, new utilities, and native tree screening to protect the viewshed.

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

Doug Barker, District Environmental Coordinator
San Luis Obispo Coast District/California State Parks
Doug.Barker@parks.ca.gov
(805) 927-2119

Pursuant to Section 21082.1 of the California Environmental Quality Act, the California Department of Parks and Recreation (DPR or California State Parks) has independently reviewed and analyzed the Initial Study and Draft 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 Negative Declaration.

_____ _____

Dan Falat Date
District Superintendent

_____ _____

Doug Barker Date
District Environmental Coordinator

Chapter 1 Introduction

1.1. INTRODUCTION AND REGULATORY GUIDANCE

The Initial Study/Negative Declaration (IS/ND) has been prepared by the California Department of Parks and Recreation (DPR) to evaluate the potential environmental effects of the proposed Office Modular Relocation and Replacement Project at Hearst San Simeon State Historical Monument, and 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 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/ND conforms to the content requirements under CEQA Guidelines §15071.

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:

John Fairweather, Project Manager, 750 Hearst Castle Rd. San Simeon, CA 93452
(805) 712-4865
Email: John.Fairweather@parks.ca.gov

Questions / comments regarding this Initial Study/Negative Declaration should be submitted to:
Doug Barker, District Environmental Coordinator, 750 Hearst Castle Rd. San Simeon,

CA 93452
(805) 927-2119
Email: Doug.Barker@parks.ca.gov

Submissions must be in writing and postmarked or received by fax or email no later than 28 July, 2023. 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 Office Modular Relocation and Replacement Project at Hearst San Simeon State Historical Monument, and Hearst San Simeon State Park. 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 - References.
  This chapter identifies the references and sources used in the preparation of this IS/ND.

- Chapter 6 - 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 Office Modular Relocation and Replacement Project would result in less than significant impacts for the following issues: aesthetics, agricultural resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems and wildfire.

In accordance with §15064(f)(3) of the CEQA Guidelines, the lead agency may prepare a negative declaration if it determines there is no substantial evidence that a project may have a significant effect on the environment. Based on the available project information and the environmental analysis presented in this document, there is no substantial evidence that, with the incorporation of project requirements, the proposed project would have a significant effect on the environment.

Chapter 2 Project Description

2.1 INTRODUCTION

This Initial Study/Negative Declaration (IS/ND) has been prepared by the California Department of Parks and Recreation (DPR or California State Parks) to evaluate the potential environmental effects of the proposed Office Modular Relocation and Replacement Project at Hearst San Simeon State Historical Monument and Hearst San Simeon State Park, located in San Luis Obispo County, California.

Hearst San Simeon State Historical Monument, commonly known as Hearst Castle®, is an iconic representation of Spanish colonial revival architecture designed by Julia Morgan, the first licensed female architect in California. Hearst Castle consists of an approximately 68,500 square foot main house or "Casa Grande," 3 smaller guest houses totaling approximately 11,500 square feet, an outdoor "Neptune pool" and an indoor "Roman pool." Hearst Castle is an AAM-accredited museum containing a notable collection of renaissance paintings, religious panels, French provincial furniture, and ancient Greek vases.

The existing modular offices on the Hearst Castle property are used by the Hearst Castle guide staff and are 30 to 40 years old, in poor condition, and have exceeded their useful lifespan. The project goal is to replace the guide office complex modulars in situ and to install a new office complex on the eastern edge of the property known as "Elephant Hill" for museum support staff who currently work in rooms inside the monument. Relocating staff out of the monument will reduce historical resource impacts and allow for restoration activities and provide opportunities for enhanced interpretation and education. In addition, the existing district staff office modulars located at the bottom of the hilltop property, adjacent to the Visitor Center and near Highway 1, will be replaced in situ.

The San Simeon Creek Campground located within Hearst San Simeon State Park includes riparian habitat for steelhead salmon and other listed species, wetlands, Monterey Pine Forests and San Simeon Creek, which flows into the Pacific Ocean during high flows and the rainy season and is otherwise separated from the ocean by a sand bar. The area is protected by its designation as a Natural Preserve. Combined, the creek and wetlands serve as a pristine example of functioning coastal wetlands and old-growth Monterey pine forest. Several storage sheds and greenhouses have been removed to make way for 3 new modulars totaling 3,168 square feet in situ for campground staff.

2.2 PROJECT LOCATION AND SETTING

Hearst Castle is owned and operated by DPR and is located on a 167-acre parcel within the larger, privately owned, Hearst Ranch on the north coast of San Luis Obispo County.

The castle sits on a ridgeline at an elevation of 1,650 feet overlooking San Simeon Bay. The bay is fed by Arroyo del Puerto to the north and Broken Bridge Creek to the south. The Visitor Center is located on Highway 1 at Hearst Castle Rd. across from San Simeon Bay and connects to the castle by a 6-mile easement over (privately-owned) Hearst Ranch.

San Simeon Campground is located at the confluence of San Simeon Creek and Van Gordon Creek, 5 miles to the south of the Visitor Center, also on Highway 1 at San Simeon Creek Rd. and resides in the larger Hearst San Simeon State Park. The campground consists of 201 campsites and RV sites.

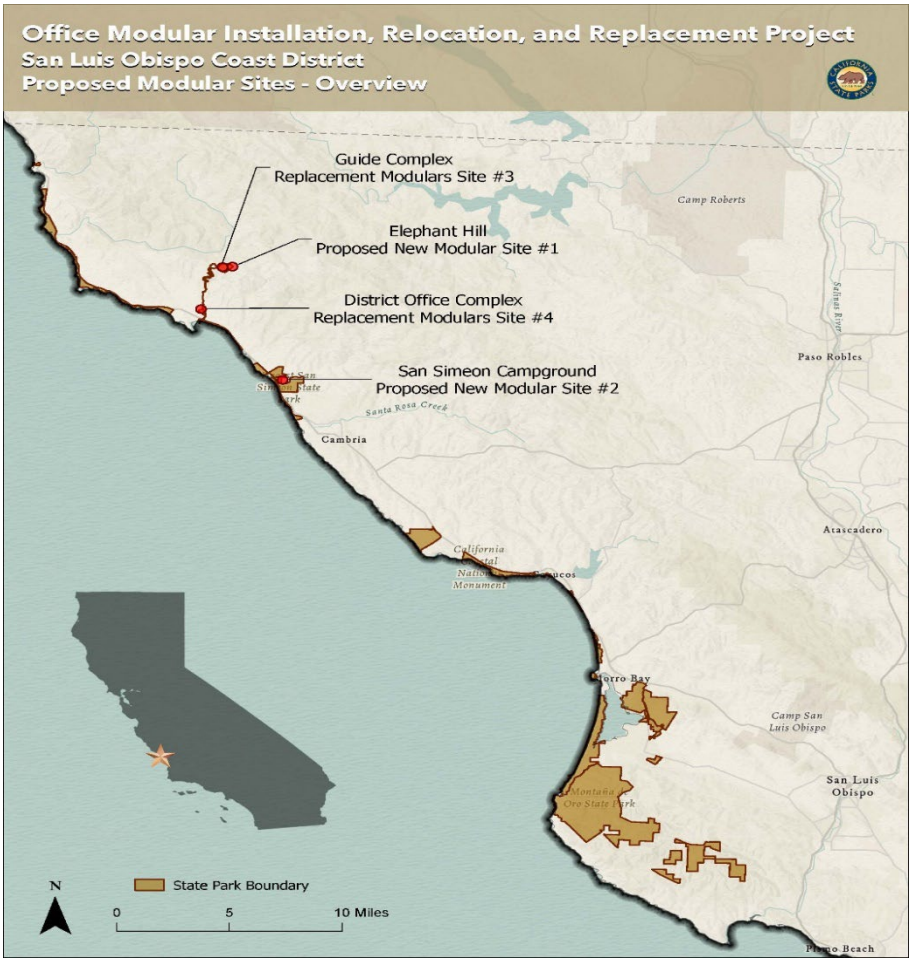

Figure 1. Project site locations overview

The project is located on four different sites within Hearst San Simeon State Historical Monument and San Simeon Creek Campground. They are characterized as follows:

Site 1 – Proposed Elephant Hill New Modulars

This 7,500 square foot rectangular site is on the eastern portion of Elephant Hill, a ¼ acre maintenance and service facility area for Hearst Castle. Elephant Hill is part of a larger ridgeline that was graded flat for the construction of the access and service roads around and below the castle. The site gets its name from the former octagonal enclosure that housed Hearst's zoo animals (including elephants) at the far eastern edge of the hill. Adjacent to the octagonal enclosure was a series of dog kennels and on the western edge of the hill was a series of garages. The site was also referred to as "garage hill." Some of the wooden kennel structures and a portion of a garage still exist and have been maintained consistent with Secretary of Interior standards for preservation of historic buildings. In modern times, a second "garage building" was added to the historic one, impacting the integrity of the original. A historic deodar cedar adjacent to the former elephant enclosure still stands today. Elephant Hill is not in a public use area and is considered a castle service area for maintenance, grounds, fire fighter / security, and restoration staff who work inside the structures.

Figure 2: Proposed Elephant Hill new modular project site

This area was developed by Hearst and his architect, Julia Morgan, in the late 1920s and 1930s, first as a car storage space and later expanded to include a zoo enclosure. Due to its evolving purposes, the area was first known as “Garage Hill,” then as “Animal Hill,” and is now referred to by State Parks staff simply as “Elephant Hill,” in reference to the elephant that was housed on the site. Further east and downhill from these elevated areas were Hearst’s horse stables and workshops for construction staff, which have since been demolished.

Figure 3: 1937 aerial photograph, Olmsted Center, CLR Vol. 1. Note the octagonal zoo enclosure on the far right of the photograph.

Numerous guests and workers at Hearst Castle remembered this area of the property as the space where the dangerous animals were kept. They expressed a combination of wonder and fear of the animals at San Simeon. Brayton Laird, who worked in the orchard, stated “All night long the lions…roaring over in the zoo would keep us awake sometimes” (*Remembering San Simeon*, 107). One guest noted: “"In addition to this collection on the mountain there is a miniature zoo out back of The Castle, with lion, tiger, puma, some other funny things, monkeys, apes and an elephant; also dog kennels with every kind of a dog you ever heard of, and the cunningest Dachshunds you ever saw. These latter *[sic]* seem to be the favorites of Mr. Hearst and three follow him and Marion all around the house, and are very friendly with the guests, particularly ‘Ghandi’” (*Remembering San Simeon*, pg. 9). Actor Ralph Bellamy described the moment he realized the zoo was situated close to the residences, stating: “…I was the first one to perform my nightly ablutions and when I came out of the bathroom, I found my wife petrified in the middle of the room saying, 'There's a lion outside that window.' And I said, 'Oh, come on, it's late. We had a drink or two. Go ahead and get your face washed and get to bed.' When we woke up the next morning and I went to the window, there was a lion outside the window!” (*Remembering San Simeon,* pg. 18).

Figure 4: 1942 aerial photograph, Olmsted Center CLR Vol. 1.

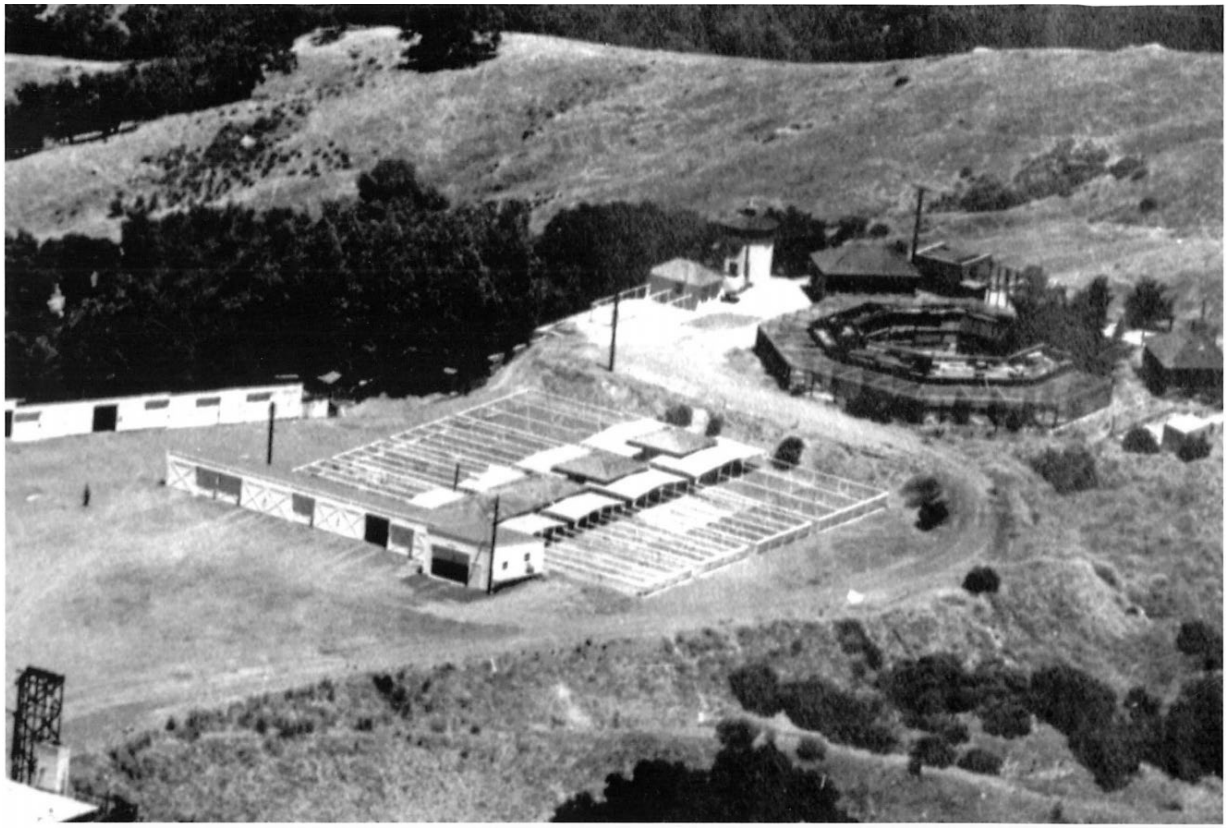

Figure 5: 1948 aerial photograph of the dog kennels and octagonal animal pen. Hearst Castle Photo Archives.

Hearst continued to maintain his vast zoo until the mid-1930s, when his diminished finances required him to sell or donate the animals. The dog kennels and octagonal pen remained standing at Hearst Castle through Hearst's death in 1951 and the transfer of his estate to the State of California in 1958. The zoo cages, workshops, and a warehouse on Garage Hill were removed in piecemeal fashion following the State's acquisition of the property and throughout the 1960s. The demolitions were deemed necessary to remove buildings thought to be unsightly or potential fire hazards (CLR Vol. 1, pg. 218). The remaining buildings, including the garage building and dog kennels, were repurposed for use as restoration workshops and storage areas.

The Cultural Landscape Report for Hearst San Simeon State Historical Monument (CLR), published by the Olmsted Center in 2009, determined that the spatial organization of Garage Hill had been altered to such an extent that it no longer contributed to the cultural landscape of Hearst Castle, stating: "Garage Hill and its environs served many needs for the estate, both for its construction and recreation. As its name implies, cars and the estate's fire engine were parked here. Cages for Hearst's animals, including the dog runs and houses and an octagonal cage for more exotic animals, were built east of the Garage. Around Garage Hill's perimeter were various workshops that were used by construction workers and artisans working on the estate. Garage Hill provided a finite amount of space so similar needs were addressed at an expanded location east of Garage Hill...The Garage and workshops exist intact on Garage Hill. The dog houses remain, but their associated dog runs and the octagonal animal cage have been lost. Most surfaces have been paved and a parking lot has been added to accommodate the Hearst Castle staff. All of the workshops and stables located east of Garage Hill have been lost, though some of their foundations remain.…Garage Hill and its environs do not contribute to the historic character of the landscape. The area is not a character-defining spatial feature of the historic period due to the loss and additions of several buildings" (CLR Vol. 3, pgs. 292-293).

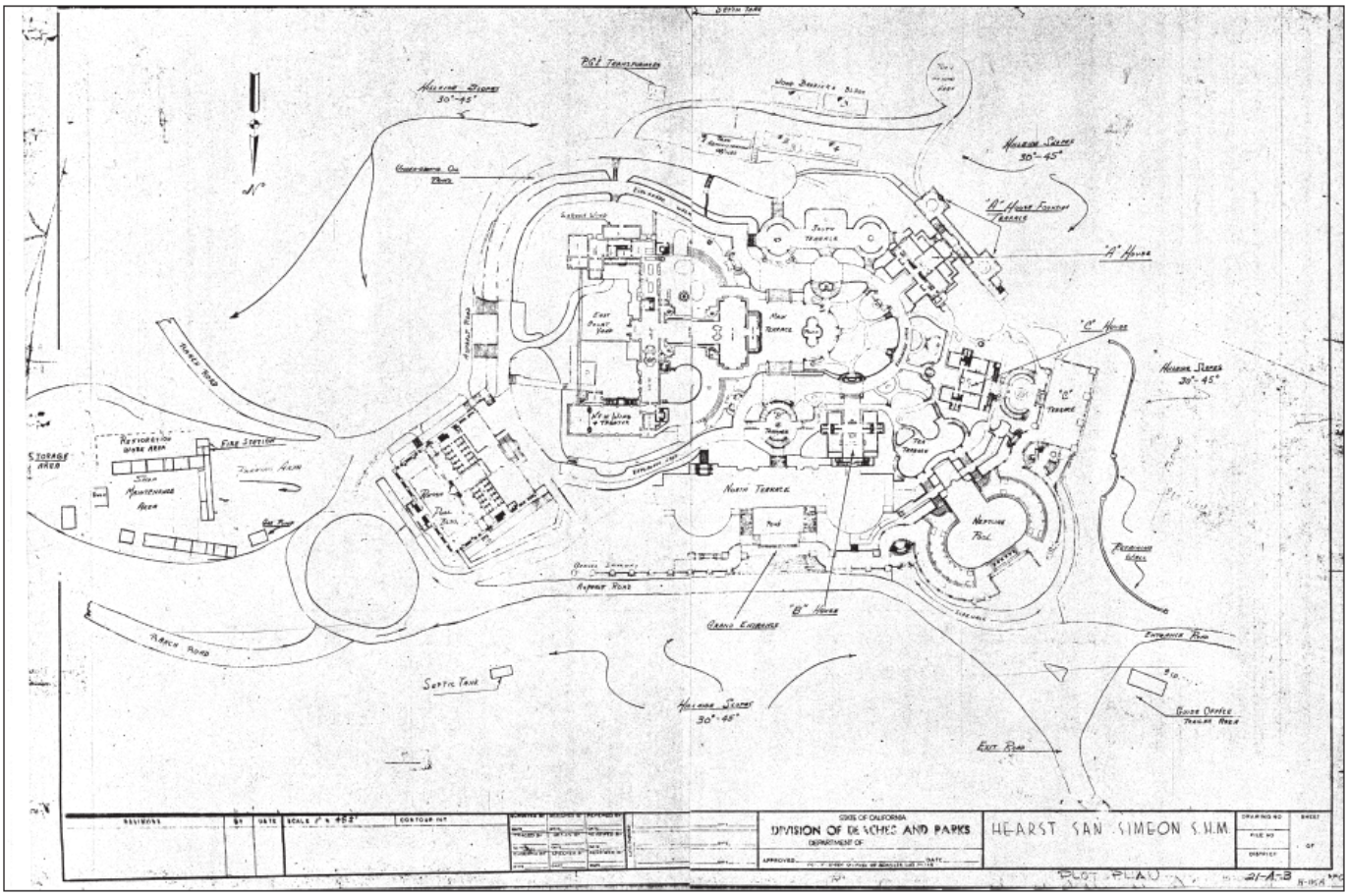

Figure 6: This plot plan shows the existing buildings at Hearst Castle during the 1960s. Note the disappearance of the octagon animal pen and the repurposing of Garage Hill into a “maintenance area.” CLR Vol. 1, pg. 232.

Despite this loss of integrity, the CLR also determined that some of the buildings on Garage Hill could still be considered individually contributing to the cultural landscape, including the long garage building, dog kennel buildings, paint shop, and a storage building currently used as a water utility room. Any alterations to those original buildings should involve in-kind material replacement and any additional buildings should complement the surrounding historic features in “massing, size, scale, and design,” as per the Secretary of the Interior’s Standards (2017, pg. 26). While the staff service area on Garage Hill is removed from the public tour routes, it is still visible to visitors, and rests within the cultural landscape of Hearst Castle. New buildings added to this area should thus be compatible with the massing, size, scale, and architectural features of the historic Garage Hill buildings, and should avoid distracting visitors from the historic features and buildings of the Hearst Castle historic landscape.

This project proposes to add three new modular buildings, their accompanying utilities, and ADA parking to improve staff office space on the hilltop. Currently, some staff members use rooms within Casa Grande as their offices, adding undue wear and tear on the buildings and providing an unhealthy environment for staff due to the lack of heating, cooling, and protection from moisture in the castle rooms.

This project will add staff support buildings to an area of the property that was historically used for staff/construction support, will improve staff safety and health, and will reduce wear and tear on the historic buildings. The project area is not visited on tours and sits at the far end of the staff parking lot, which demarcates the public access area from the staff services area of the property. The use of this area for the installation of staff offices is consistent with its historical use, and critical to staff operations.

The three buildings will be installed over the former site of the octagonal zoo enclosure. Currently the project area is screened from public view by existing oleanders and the long garage building. Key viewing areas include tour stops from Hearst Castle and the ranch road on Hearst Ranch. To minimize the visibility of the modular buildings from the perspective of the Hearst Ranch, appropriate plants (toyon and oak trees) will be planted by Hearst Castle gardening staff to provide adequate screening. A minimum of 24 oak trees and additional oleander plants or toyon trees will be planted between the modular buildings at the Hearst Ranch. The project has also been designed to protect in place an existing Deodar Cedar that dates to Hearst's residency. In addition, the modulars will be a tan/earth color on both their siding and roof, ensuring that the buildings will blend into the surrounding environment as much as possible from all potential viewsheds, and will not distract visitors from the adjacent historic features and buildings. The vegetation screening and subtle color palette of the modulars will together reduce any potential impact on the historic property to de minimis levels (see Appendix A for visual assessments).

Site 2 – Proposed San Simeon Campground New Modular Site

This site is located eastward of the campfire center at the park boundary with Van Gordon Creek Rd. The 10,100 square foot site is adjacent to the existing maintenance yard and workshop, two (2) existing modular residences, a camp host RV site, a dump station, a former greenhouse and former storage sheds.

The site is adjacent to the confluence of San Simeon Creek and Van Gordon Creek and associated wetlands. The site has been heavily disturbed along the former Van Gordon Creek Rd, an old north-south surface street that preceded construction of Highway 1. Under DPR ownership, the site historically contained greenhouses that have since been removed.

Figure 7: Proposed San Simeon Campground new modular project site.

The San Simeon Campground is built within and adjacent to several recorded prehistoric archaeological sites. Site 2 for the Project is located adjacent to CA-SLO-383 and CA-SLO-187 within an area of significant previous disturbance from nineteenth and twentieth century agricultural activities, later construction of Van Gordon Creek Road, and development of the campground and DPR buildings and infrastructure. CA-SLO-187 is a prehistoric archaeological site which has been nominated to the National Register of Historic Places located adjacent to the Site 2 project area to the south. The Pa-Nu Cultural Preserve includes portions of site CA-SLO-383, located adjacent to Highway 1 on both the east and west sides along the northern bluffs of San Simeon Creek. This site is adjacent to Site 2 to the north and west on the upper terrace.

Site 3 – Guide Complex Replacement Modulars Site

Site 3 contains the existing guide staff office modular buildings, which will be replaced in roughly the same location on “China Hill” adjacent to Hearst Castle and across the access road from the Neptune Pool. The expanded 13,000 square foot site is cut into the southern side of China Hill, which rises steeply toward an underground reservoir and a cellular antenna site. China Hill consists of native coast live oaks and non-native pines and acacia, as well as landscaped oleanders along the road edge.

Figure 8: Guide office complex modular replacement project site

The grouping of modular buildings known as the guide complex was developed by State Parks staff following the donation of the Hearst Castle estate to the Department of Parks and Recreation in 1958. This area, located adjacent to the upper gate entrance to the hilltop property, began as simply a tent covering to provide rest areas for tour guides in between their tours. The complex was expanded over time, and currently consists of three modular buildings that tour guide staff utilize as their offices, staff library, and break room.

Figure 9: 1958 photograph of the first guide rest area, located where the current guide complex sits. Hearst San Simeon State Historical Monument Archives.

These buildings were recommended for removal or downsizing in the Olmsted Center's 2009 Cultural Landscape Report, due to their potential to distract visitors from the historic landscape. As the report recommended: "The existing guide facility detracts from the historic character of the property and should be replaced. A smaller permanent building should be constructed immediately north of the current location adjacent to the gate leading to the North Branch of the Approach Road (Down-Road). This new building should be located well away from the edge of the Approach Road... In order to reduce the visual impact on the historic landscape, the program for the permanent building should be limited and should only effectively serve as a ready-room for guide staff. In addition, the parking of personal vehicles at this location should be discouraged. Functions such as the guide library, or other requirements of the guide staff, should be located elsewhere within the Service and Utility Landscape Character Area, possibly within a new building. Consideration should be given to constructing a new building on the footprint of one of the former Construction Camp buildings to the immediate south of the Hilltop Gardens. This location would not be visible to park visitors and is well beyond the boundaries of the Hilltop Gardens Restoration Subzone" (Vol. 4, pg.34). However, staff safety and ease of access to the tour routes necessitates the continued use of this area as guide offices, despite the recommendation of the CLR.

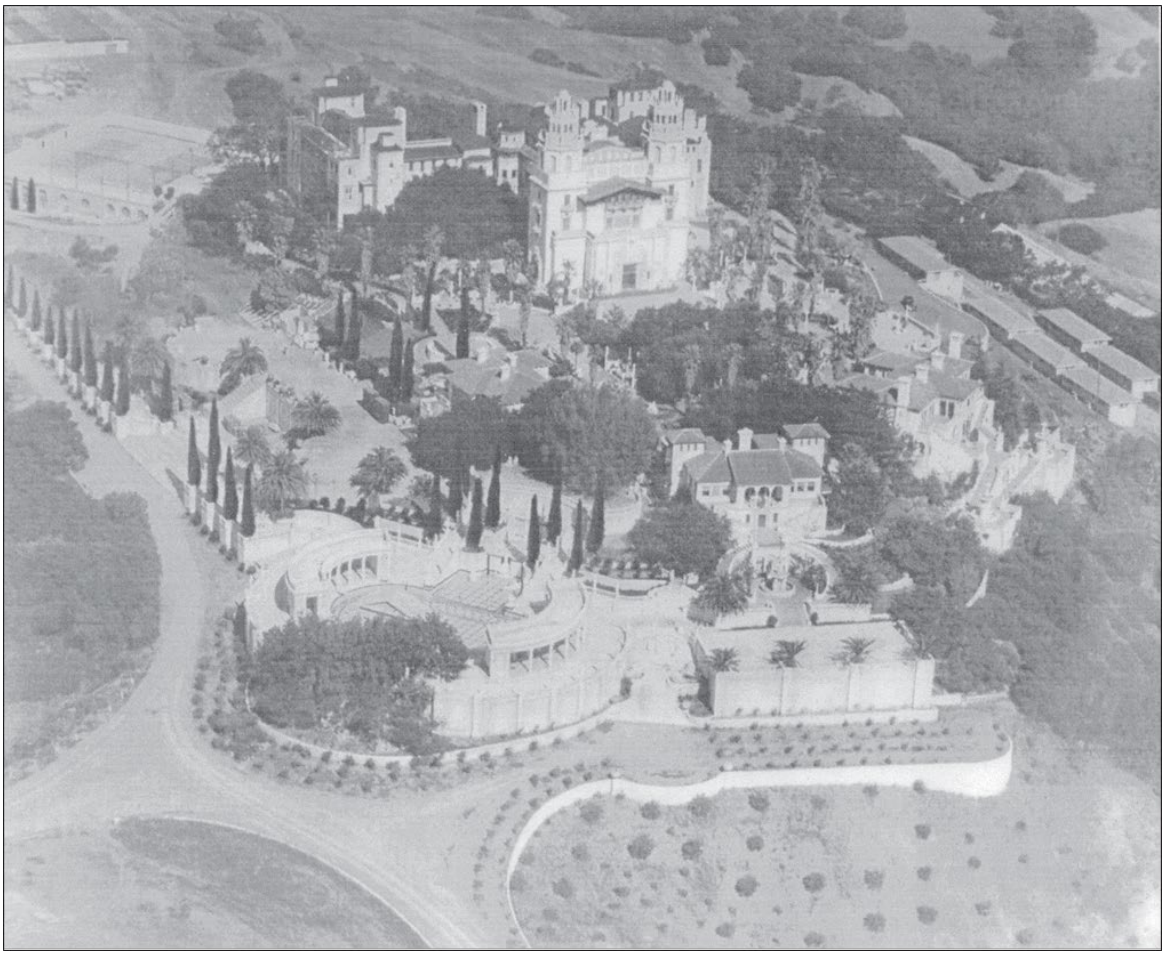

Figure 10: This Feb. 1958 aerial photograph of the hilltop shows the future site of the tour guide facility in the bottom left corner. While the photograph is not definitive, it seems to show indications of a retaining wall separating the future guide facility site from the Approach Road. Hearst San Simeon State Historical Monument Archives and CLR Vol. 1, pg. 211.

Site 4 – District Office Complex Replacement Modulars Site

Site 4 contains the existing District Office Modulars located adjacent to the Hearst Castle Visitor Center and Highway 1. The replacement modulars will be located on the same footprint but will be slightly larger than the existing units. The site is heavily disturbed, having been graded flat when the Visitor Center was constructed. Located in the northernmost section of the Visitor Center, the site sits between the bus loading area at gate 2 on Hearst Castle Rd, a boundary fence with Hearst Ranch, and an employee parking lot.

Figure 11: District office complex modular replacement project site

The site consists of 5 offices comprised of 12 modulars used by District administrative staff, park rangers, and resources staff. The 5 new offices will be replaced in situ. The pie shaped site is approximately 30,000 square feet and is flat. Existing accessible parking will remain as will additional periphery parking spaces. The site is screened from the ranch, parking lot and bus loading area by rows of cypress trees. Accessible ramps and fire hydrants have been added to the office complex. The area of the existing 12 units is approximately 8,640 square feet.

Figure 12: Existing District Office Modulars

Figure 13: Existing District Office Modulars

These modulars are non-historic buildings that were installed between 1999 and 2001. The buildings are located near the former site of the Hearst landing strip, where guests, staff, and Hearst's family would land at San Simeon with private airplanes. As the CLR notes, "Between 1946 and 1947 the old airport hangar, located near the site of the current state monument Visitor Center, was torn down and a new hangar built to the northwest of the Hearst Ranch building cluster along with an 8/10-mile-long runway" (CLR Vol. 1, pg. 165). This project site is located just north of the first runway and hangar location, which has since been demolished.

Archaeological surveys and testing were conducted in 1984 during planning and construction of the Visitor Center including the excavation of 40 test bores. Test excavations were negative for the presence of any subsurface archaeological deposits and subsequent archaeological monitoring of construction confirmed the absence of any archaeological materials or tribal cultural resources (Orlins 1984).

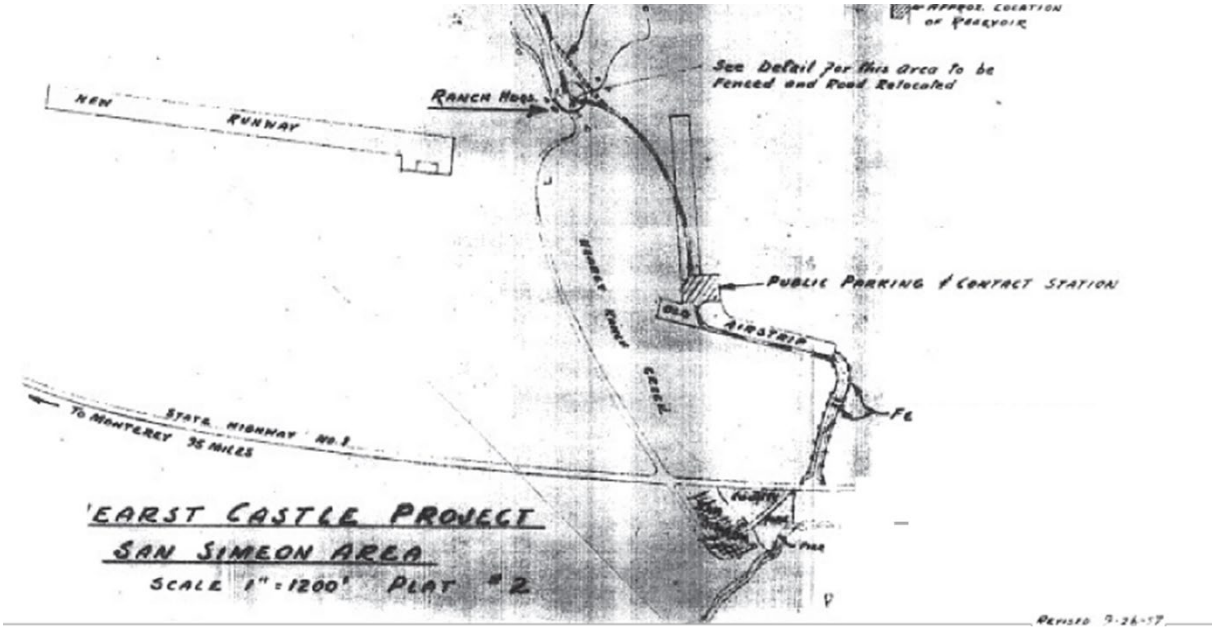

Figure 14: This sketch outlines the Hearst Castle visitor's entrance from Highway 1, which was constructed south of Hearst's original entrance to his property. The project site is located just north of the original airstrip. State of California Department of Parks and Recreation, Hearst Castle Project Diagrammatic Sketch of Hilltop, Plat Number 2, September 26, 1957, Hearst San Simeon State Historical Monument Archives and CLR Vol. 1, pg. 234.

2.3 SURROUNDING LAND USES AND DEVELOPMENT

Hearst San Simeon State Historical Monument commonly known as Hearst Castle or "the monument." is comprised of a 161-acre hilltop parcel and a 10-acre Visitor Center parcel adjacent to Highway 1. The two parcels are connected by a 6-mile-long road easement. The monument is completely surrounded by the 58,000 acre privately owned Hearst Ranch which still operates as a cattle ranch and is zoned for agricultural use.

Hearst San Simeon State Park (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 in the south, the Cambria Community Services District facility in the east and the aforementioned private, corporate, Hearst Ranch and the Los Padres National Forest in the north.

2.4 BACKGROUND AND NEED FOR THE PROJECT

Site 1: The new hilltop modulars proposed for the Elephant Hill site will result in the relocation of staff currently working inside the monument which will alleviate wear and tear on the historic resources and improve working conditions for staff. Resource impacts from monument office staff and visitors are exacerbated by the shared use and limited space inside the monument. Some of the impacted areas include the indoor Roman Pool with historic floor tiles and the leaking historic roof and tennis court above. Other competing staff use includes security and emergency response functions and art collections staff. Therefore, relocation of the staff from the monument to a new office complex on Elephant Hill will minimize historical resource impacts and allow for necessary restoration and repairs. As the monument is not climate controlled and is essentially a 100-year-old poured concrete structure, it is uncomfortable to work inside: it is cold and drafty in the winter and extremely hot in the summer. The monument was not built to meet current accessibility guidelines. All of these issues will be alleviated by relocating staff to a new, insulated, office modular complex.

Site 2: The San Simeon Campground has several aging structures that have been removed including, green houses, small storage buildings, and a well house. Most of these were located near the existing campground facilities yard and residential modulars. There is a shortage of qualified maintenance staff in the SLO Coast District, which can be addressed by offering staff housing as a job benefit, separate from and beyond wages. By installing 3 new modulars within the expanded maintenance yard area, the District hopes to recruit staff and house them closer to their work locations.

Site 3: Some of the existing guide office modulars installed in the 1970's and 1980's have exceeded their life expectancy, are not up to current building code, and have deteriorated to the point of having continuous roof leaks and termite and rodent infestation. The hilltop experiences temperature extremes common to inland valleys, rather than a moderating coastal climate. The old, poorly insulated, modulars are extremely hot in the summer and cold and drafty in the winter. The modulars also do not meet current accessibility standards. The project will install new, code compliant, insulated office modulars that are more accessible than the existing, in the same location with a slightly different footprint. The Site has a pair of existing cellular towers located behind the guide office complex, which is served by a substandard access road that is too small for the heavy trucks and equipment accessing it, as well as substandard emergency vehicle access to the wooded area of the hilltop.

Site 4: Similar to the hilltop guide offices, the District Office modulars at the base of the hill next to the Visitor Center were installed in the 1990's, have exceeded their life expectancy, are not up to current building code, and have deteriorated to the point of having continuous roof leaks and termite and rodent infestation. They too are poorly insulated and drafty, too cold in the winter and too hot in the summer.

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 monument is a significant cultural resource, listed on the National Register of Historic Places and is a fully accredited house museum. Designed by Julia Morgan, the first licensed female architect in California, the monument as a structure consists of historic mosaic tiles, marble, brass work, and gilded wrought iron, all of which deteriorate over time with continued exposure to the elements and with foot traffic. Relocating staff from the monument to new office modulars will slow the deterioration of the historic fabric and allow for much needed repair, restoration, and mitigation.

On a combined basis at all 4 sites, the project will improve working conditions for monument staff, District office staff, and coastal sector maintenance staff by providing modern, fully insulated, code compliant modulars along with upgraded electrical service and fire protection. Visitors and vendors that have business to conduct with office staff will benefit from the improved, more accessible facilities, including modern conference rooms, new restrooms, and additional parking.

2.6 PROJECT DESCRIPTION AND SCOPE OF WORK

The intent of the proposed Project is to relocate staff out of the historical monument and replace aged, existing modulars in three locations. By relocating these facilities to a larger office complex off-site, DPR will be better positioned to make necessary repairs and restoration to the monument, while reducing impacts to the historic fabric. At the three replacement locations, staff will benefit from modern office spaces that are fully insulated, code compliant, accessible, and more appropriate for staff, vendors, and visitors.

Work at the four sites will be phased. Electrical upgrades and fire hydrants have already been installed at several sites. Grading and trenching at Sites 1 and 2 have already occurred and building pads have been installed at Site 2. Installation of new modulars will occur first at Site 1 and then at Site 2. This will be followed by demolition of the existing Guide Trailers at Site 3 and installation of replacement modulars. Finally at Site 4, the existing District Office Complex will be demolished and replaced with new, enlarged modulars. The proposed Project includes the following components:

2.6.1 Site 1 - Elephant Hill New Office Modulars:

This phase of the project will install a newly constructed office complex on Elephant Hill consisting of three fire code and ADA compliant modulars with fire sprinklers totaling approximately 6,912 square feet. Two of the offices will be approximately 48 feet by 60 feet and the third will be approximately 24 feet by 48 feet. The scope of work will include the following actions:

- Remove one 24-inch DBH non-native, maple tree. The existing historic cedar tree within the project area will be protected in place and any necessary protection and/or avoidance measures will be implemented for natural and historical resource protection.
- Clear, grub and grade the site for construction, accessibility and drainage of an area approximately 11,520 square feet;
- Trench and Install approximately 320 feet of 2-inch PVC water line and 100 feet of 4-inch ABS wastewater lines;
- Upgrade the existing electrical service from the PG&E pole by trenching, installing conduit, pouring concrete bases for new equipment, installing wire, panels, a transformer, and a load bank;
- On this site, trench and install approximately 1,500 feet of 4-inch electrical conduit, panels, boxes, and wiring;
- Excavate and install two 6,000-gallon septic holding tanks, backflow preventer and connect to sanitary sewer pipe. Total excavation, grading, and backfilling will be approximately 350 cubic yards;
- Install: a van-accessible and regular ADA parking space on a 26-foot by 18-foot, 8-inch concrete slab, signage, striping, wheel stops, and concrete paths;
- Relocate or remove where necessary existing infrastructure to accommodate new construction including but not limited to electrical boxes, fire hydrants, bollards, and water lines;
- Import up to 130 cubic yards of class-2 base rock and compact for building pads;
- Install storm drain inlets, a 2-foot concrete valley gutter, roof gutters, storm drains, and rip-rap outlets;
- Finish grade and prepare the site in totality for the installation of the three modular buildings and connection to existing and new water, sewer and electrical lines.
- Plant 24 coast live oaks on the south facing slope of the site to screen the new offices from the ranch and tennis courts.

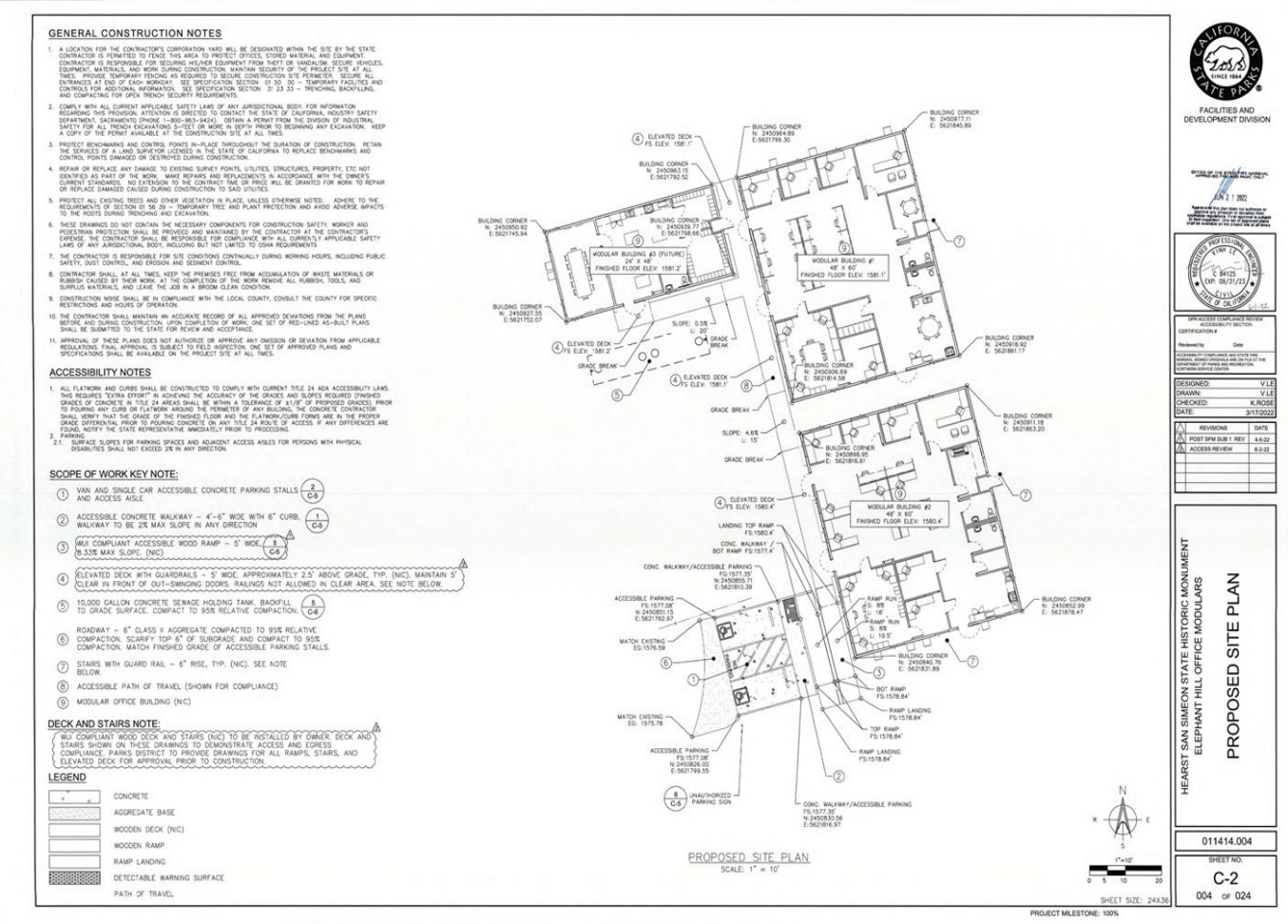

Figure 15: Elephant Hill Site Plan Site 1

2.6.2 Site 2 – San Simeon Creek Campground New Residential Modulars

This phase of the project will remove 6 existing structures within the San Simeon Campground consisting of old storage sheds, greenhouses, and a well house. The structures will be replaced with three 24-foot by 44-foot modular buildings totaling approximately 3,168 square feet. The new units will be placed in the San Simeon Campground firewood lot at the San Simeon Creek Campground maintenance yard, adjacent to two existing state employee modular residences. The site was graded in 2022, and electrical upgrades installed. The existing water distribution lines were also extended to the site and a fire hydrant installed. The sewer line will be extended to existing infrastructure located in the campground. There are no natural gas lines in the park, so gas will be supplied by three 500-gallon propane tanks. The State has executed a public works contract for the preparation and installation of all utilities for the project.

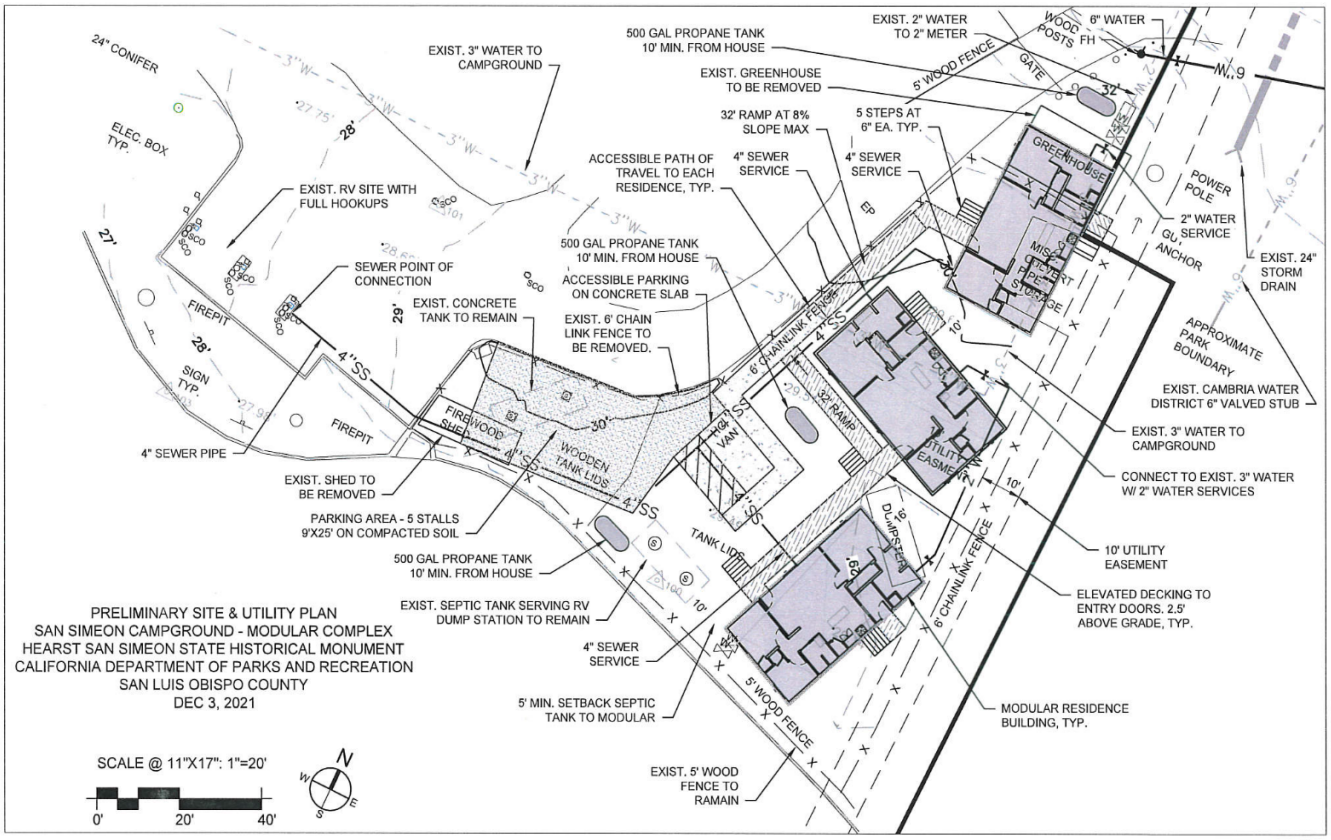

Figure 16: San Simeon Campground Site Plan Site 2

2.6.3 Site 3 - Guide Office Complex on China Hill

This phase of the project will replace three non-historic modular offices used by Hearst Castle guides at Hearst San Simeon State Historical Monument with new, energy efficient units that meet current building and accessibility codes. The area of the new modulars will total 4,464 square feet.

To minimize potential visual impact to the historic landscape, the new modular units will be set back from the access road to allow for screening vegetation to be installed between the modular units and the road. Following installation of the new modular units, the grounds department will insert 3 Toyon trees to obscure the view of the guide complex from visitors driving into the entrance gate. Two Toyons will be planted in the ground and one will be planted in a pot due to limited space. This species was planted by Hearst during his residency at Hearst Castle, and is consistent with the surrounding cultural landscape. This vegetation screening will largely obstruct the view of the modular buildings from the public. In addition to vegetation screening, the new modular buildings will have a brown/earth-colored roofing material, thus ensuring the buildings blend into the surrounding landscape and do not distract visitors from the historic features of Hearst Castle (see Appendix A for visual assessment).

While these buildings are non-historic, construction will occur adjacent to historic features, notably adjacent to a concrete retaining wall dividing the guide modular units and the Hearst Castle access road, which appears to date to the period of Hearst's residency. This wall will be protected in place during construction.

The scope of work will include the following actions:

- Demolish and remove the existing modulars and dispose of at a licensed site;
- Remove 4 mature coast live oak trees from the slope behind the guide trailers and remove 6 non-native, non-scenic trees that would be impacted by the realigned/relocated fence and gate;
- Regrade the site including the road behind the guide offices to maintain access to the cellular communications towers and China Hill. Regrade the slope behind the guide trailer to achieve a 2:1 grade and install fiber rolls, fabric, and reseed for erosion control. Total excavation will be approximately 50 cubic yards;
- Relocate an existing propane tank and the fence and gate behind the guide offices and remove 6 non-native, non-scenic trees that would be impacted by the realigned/relocated fence and gate;
- Excavate approximately sixty-five, 3-foot-deep x 18" diameter holes for the relocated fence posts to be secured in concrete;
- Prepare the building pads and install two (2) new 48-feet by 24-feet modulars and one (1) new 36-feet by 60-feet modular; and
- Reconnect utilities, install accessible ramps to each modular, and plant a minimum of 3 native toyon trees and additional oleanders as deemed necessary by State Parks staff to screen the modulars from the tour route viewshed; and
- Replace the 4 oaks with 24 coast live oaks, each a minimum of 1-gallon, at the receptor site on elephant hill pursuant to Title 23 of the San Luis Obispo County Coastal Zone Land Use Ordinance, Section 23.05.062

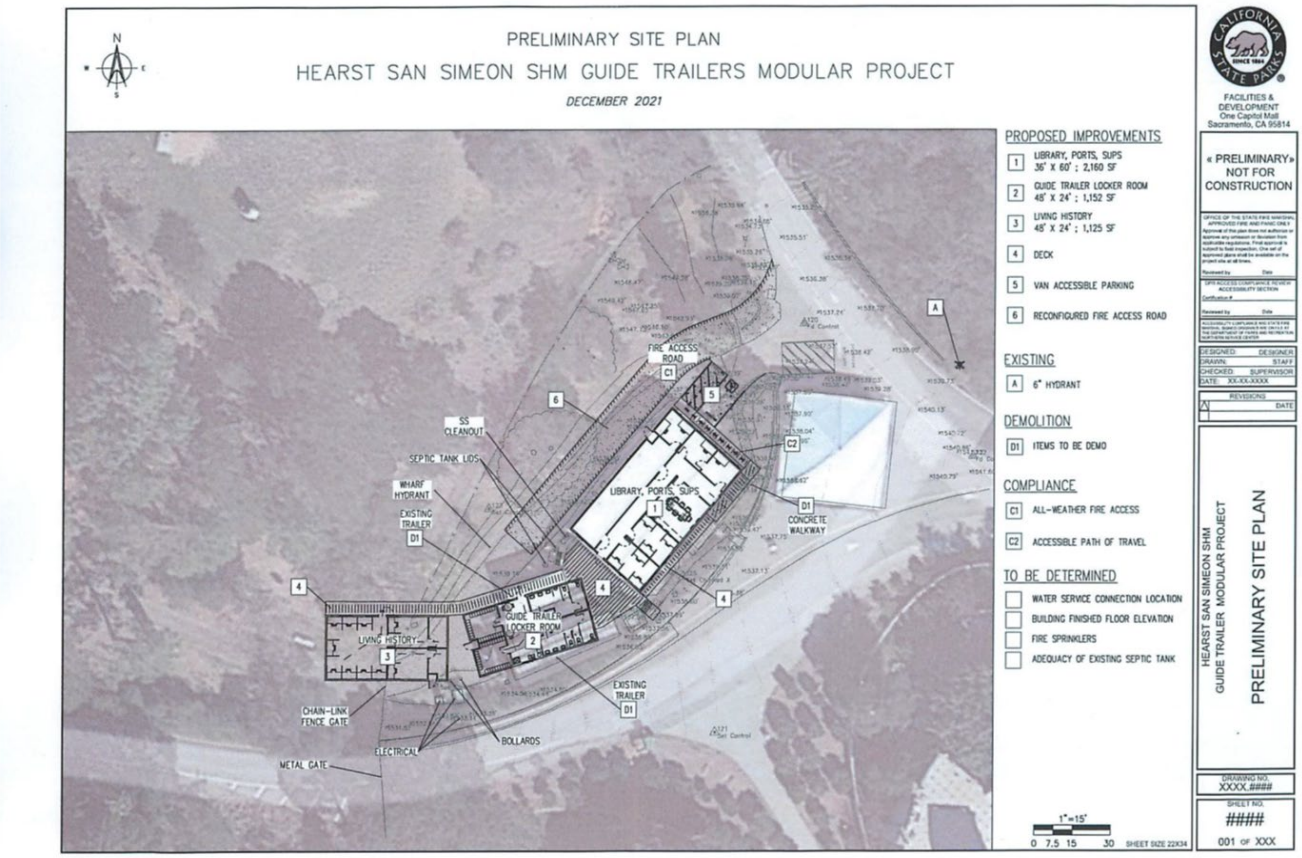

Figure 17: Guide Office Site Plan Site 3

2.6.4 Site 4 – District Office Complex at Visitor Center

This phase of the project will replace all existing modular units in the District Office Complex at the base of hill, next to the Visitor Center. There are currently 5 separate offices in the District Complex consisting of 12 units, each 60 feet by 12 feet, totaling 8,640 square feet. They will be replaced by 15 units totaling 10,224 square feet. All units will meet current fire code and accessibility requirements, and will contain fire sprinklers.

This phase of the project will include the following actions:

- Excavate trenches totaling 640 linear feet to a depth of three feet and width of one foot in order to Install approximately 380 feet of six-inch water line and 3 fire hydrants and approximately 260 feet of two-inch water line for risers.

- Remove one 30-inch DBH non-native sycamore tree and 39 small ornamental shrubs.
- Grade the enlarged building pads flat and import up to 4 inches of road base for the pads.
- Install the 15 new modulars in various configurations for the five enlarged offices.
- Connect the new buildings to existing utilities
- Replace removed trees with native species and locate where necessary to screen offices from the ranch and bus loading area.

Figure 18: District Office Site 4

2.7 PROJECT REQUIREMENTS

Under the CEQA guidelines, the Department of Parks and Recreation (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 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 permits 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 reduce 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 project impacts for projects that have unique issues but do not typically standardize these for projects statewide. As part of the Initial Study review process, DPR has identified the following Standard and Specific Project Requirements that apply to the project to ensure that impacts remain less than significant:

Table 1: Project Requirements

ELEMENT/ TITLE	REQUIREMENT
	necessary by State Parks staff to screen the modulars from the tour route viewshed at the Hearst Castle Guide Complex site. In addition, the modulars must be painted a brown/ earth-tone color. ▪ **AESTH-2:** Modular buildings must be painted a brown/ earth-tone color. ▪ **AESTH-3:** A minimum of 24 coast live oaks must be planted at Project Site 1, Elephant Hill, each a minimum of 1-gallons, to screen the viewshed from the Hearst Ranch. ▪ **AESTH-4**: An existing Deodar Cedar must be protected in place throughout the project. This includes placing protective fencing around dripline of the tree and avoiding disturbance to the root structure during construction. ▪ **AESTH-5:** The non-native tree and 39 shrubs currently located at the District Office site will be replaced with native species that will be located where necessary to screen the offices from the Hearst Ranch and tour bus loading area. ▪ **AESTH-6:** All exterior lighting at all four sites shall be shielded, down-cast, and dark sky compliant.

AIR QUALITY	▪ **AQ-1**: During dry, dusty conditions, all active construction areas will be lightly sprayed with dust suppressant to reduce dust without causing runoff. ▪ **AQ-2**: 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. ▪ **AQ-3:** All gasoline-powered equipment will be maintained according to manufacturer's specifications, and in compliance with all State and federal requirements. ▪ **AQ-4:** Paved streets adjacent to the Site shall either be swept or washed at the end of each day, or as required, to remove excessive accumulations of silt and/or mud that could have resulted from project-related activities. ▪ **AQ-5:** 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.
BIOLOGICAL RESOURCES	▪ **BR-1**: Environmental Sensitive Areas (ESA's) will be demarcated, and all work personnel and vehicles will avoid those areas. ▪ **BR-2:** Environmental training will be provided by a State Parks Environmental Scientist for all work personnel prior to the onset of work activities, including staging and stockpiling. ▪ **BR-3:** Plant a minimum of 24 coast live oaks at Project Site 1, Elephant Hill, each a minimum of 1-gallons, to offset the loss of 4 oaks. ▪ **BR-4:** plant a minimum of 3 native toyon trees and additional oleanders as deemed necessary by State Parks staff to screen the Guide modulars from the tour route viewshed, at Project Site 3;
CULTURAL RESOURCES	▪ **CULT-1:** Cultural 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 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. The staff will be instructed to halt work in the event that any such cultural resources are unearthed. ▪ **CULT-2:** Inadvertent Discoveries: If any previously undocumented cultural resources are encountered within the project (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, Historian or a DPR-qualified cultural resource specialist has evaluated the find and implemented appropriate treatment and regulatory compliance. ▪ **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 CDPR 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. The County Coroner's office will make the determination whether any human remains are of prehistoric Native American origin or subject to further law enforcement investigation. If the coroner determines the remains are of Native American origin,,,,,,,, they will contact the NAHC within 24 hours. The NAHC will appoint a Most Likely Descendant (MLD). The MLD will have 48 hours from the time of the appointment to visit the site and determine the appropriate treatment and disposition of the human remains and anything subject to the AB 275. Work is not to resume in the area of the find until proper disposition is complete (PRC §5097.98). If a Native American monitor is on-site at the time of the discovery, onsite CDPR staff will work with them to ensure any human remains and/or funerary objects are left in place or returned to the point of discovery and covered with soil until further notice. No human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the site prior to the MLD determination. ▪ **CULT-4:** All excavations at Site 1 and 2 will require archaeological monitoring by a Cultural Resources Specialist. Tribal monitoring will accompany any excavations within previously undisturbed soils at Site 2. The contractor shall facilitate observation of excavations and subsurface sediments by monitors and allow for evaluation of any discoveries. Any remnants of historic structures at Site 1 shall be photo documented by the Cultural Resources Specialist.

	▪ **CULT-5:** The historic Deodar Cedar located on Elephant Hill will be protected in place throughout the project, as noted in AESTH 5. This includes placing protective fencing around dripline of the tree and avoiding disturbance to the root structure during construction. ▪ **CULT-6:** The retaining wall surrounding the guide complex modular buildings at site 3 will be protected in place. ▪ **CULT-7:** If any historic resources, either within the project area or in the surrounding cultural landscape of Hearst Castle, are damaged as part of the project, the State Representative should be contacted immediately. A repair or replacement plan will be created that will be deemed acceptable by the State Representative at the expense of the contractor. Repair and replacement of historic objects or features must be completed by a qualified restoration specialist.
Hazardous Materials	▪ **HAZ-1:** 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:** Prior to the start of on-site construction activities, Contractor will prepare a Spill Prevention and Response Plan (SPRP) as part of the Storm Water Pollution Prevention Plan (SWPPP) for DPR 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. ✓ identification of lawfully permitted or authorized disposal destinations outside of the project site. ✓ Contractor will set up decontamination areas for vehicles and equipment at Park entry/exit points. The decontamination areas will be designed to completely contain all wash water generated from washing vehicles and equipment. Best Management Practices (BMPs) will be installed, as necessary, to prevent the dispersal of wash water beyond the boundaries of the decontamination area, including over-spray. ✓ 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). ✓ All heavy equipment will be required to include spark arrestors or turbo chargers (which eliminate sparks in exhaust) and have fire extinguishers on-site. ✓ Construction crews will park vehicles away 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. ▪ 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.
NOISE	▪ **NOISE-1:** 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. ▪ **NOISE-2:** 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. ▪ **NOISE-3:** 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.

	✓ **NOISE-4:** All motorized construction equipment will be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes.
GEOLOGY AND SOILS:	▪ **GEO-1:** 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. Site 1, Elephant Hill, will require BMPs to be in place along the slopes below the modular site. Site 3. Guide Office, will require BMP's to be in place on the slope above the widened access road behind the modulars. At a minimum, BMP's will include staked fiber rolls free of plastic netting, fiber blankets, compost or soil amendment, and reseeding with local native seed stock. ▪ **GEO-2:** Soils: All earthwork and subgrade work will be inspected by a certified geologist and approved via the submittal process to ensure compaction is approved for compliance with geology and soils specifications. Concrete work will also be tested for pass/fail by a certified lab for compliance with project structural specifications.
HYDROLOGY:	▪ **HYDRO-1:** All refueling/servicing of equipment, solid waste disposal and worksite sanitation stations must occur in designated staging areas away from flowing water. ▪ **HYDRO-2:** Implement standard erosion, sediment control, and pollution prevention requirements.

2.8 PROJECT IMPLEMENTATION

Project construction on the new sites will be phased. Some preliminary utility work including electrical upgrades, pad improvements and fire hydrant installation began in 2022 on the hilltop, at the District Office and at San Simeon Creek campground. Given the potential for cumulative impacts of the various related projects to occur, work was halted until environmental review and permitting could be completed for all sites.

After permitting, construction will resume at Elephant Hill and San Simeon Campground, to be completed by year-end 2023. By year-end 2024, the Guide Office Trailer complex will be completed. Finally, the District Office complex will be completed in 2025. None of the work will impact Visitor Services as the castle and campground will remain open during construction.

For construction of the new facilities at Sites 1 and 2, DPR will use a contractor with construction crews using mechanical equipment such as a backhoe, excavator, grader, loader, paver. A bobcat or mini excavator will be used to remove vegetation and for utility trenching. Most carpentry work will be done with battery powered and hand tools although a generator may be used.

To limit noise impacts at the campground, work will occur during daylight hours from 8:00 AM to 4:00 PM, Mondays through Fridays.

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.

2.9.1 HEARST CASTLE VISITATION

Table 2-Annual Visitor Attendance at Hearst San Simeon State Historical Monument (Hearst Castle)

CALENDAR YEAR	PAID VISITS	COMPED VISITS	TOTAL ATTENDANCE
2019	581,516	12,182	593,698
2018	557,495	11,597	569,092
2017	614,799	14,059	628,858
2016	712,891	31,519	744,409
2015	744,885	31,080	775,965
2014	724,409	29,998	754,407
2013	689,865	28,362	718,227
2012	641,129	27,128	668,257
2011	615,111	25,374	640,485
2010	615,439	23,354	638,793
Total Attendance	6,467,539	234,653	6,702,392
Average Yearly Attendance	646,753	23,465	670,239
Source: CDPR 2023			

2.9.2 SAN SIMEON CAMPGROUND VISITATION

Table 3-Annual Visitor Attendance at San Simeon Campground

FISCAL YEAR	FREE DAY USE	OVERNIGHT CAMPING	TOTAL ATTENDANCE
2020-2021	265,945	79,750	345,695
2019-2020	272,984	77,105	350,089
2018-2019	303,443	115,104	418,547
2017-2018	212,551	105,781	318,332
2016-2017	203,228	96,369	299,597
2015-2016	195,680	98,129	293,809
2014-2015	181,833	95,072	276,905
2013-2014	148,900	96,872	245,772
2012-2013	148,428	89,247	237,675
2011-2012	164,698	83,195	247,893
Total Attendance	2,097,690	936,624	3,034,314
Average Yearly Attendance	209,769	93,662	303,431
Source: CDPR 2023			

2.10 CONSISTENCY WITH LOCAL PLANS AND POLICIES

The project has been designed to be consistent with the Local Coastal Plan (LCP) approved by the California Coastal Commission 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 North Coast Area Plan section of the San Luis Obispo County General 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.

2.11 DISCRETIONARY APPROVALS

Table 4-Agency Permits and Approvals

AGENCY	APPROVAL
San Luis Obispo County Dept. of Planning & Building	Coastal Development Permit
California State Fire Marshall	Plan Review and Approval
Regional Water Quality Control Board	Storm Water Pollution Prevention Plan
California State Parks	Accessibility Plan Review

2.12 RELATED PROJECTS

As mentioned above, three related projects that were necessary to complete in order for the modular project to proceed and that have been started and to some extent completed are:

- Hearst Castle Electrical Upgrade Project
- San Simeon Campground Maintenance Yard Electrical Upgrade Project
- District Office Fire Hydrant Project
- San Simeon Campground Fire Hydrant Project

Other contemporaneous projects that are occurring include:

- Hearst Castle Upper Road Emergency Repairs
- Hearst Caste Lower Road Repair Project
- Hearst Castle Lower Road Emergency Repair at Lower "Y".

Chapter 3 Environmental Checklist

PROJECT INFORMATION	
1.Project Title:	Office Modular Relocation & Replacement Project
2.Lead Agency Name & Address:	California Department of Parks and Recreation
3.Contact Person & Phone Number:	Doug Barker (805) 927 2119 Hearst San Simeon State Park & State Historical Monument California Department of Parks and Recreation 750 Hearst Castle Rd San Simeon, CA 93452
4.Project Location:	750 Hearst Castle Rd. San Simeon, CA 93452
5. Project Sponsor Name & Address:	Dan Falat, District Superintendent. Same address as 4.
6.General Plan Designation:	V, H, LCP, SRA
7.Zoning:	R
8.Description of Project:	This project includes the installation of new modulars at 2 sites and demolition and replacement of existing aging modulars at 2 additional sites. At all sites, the modulars will connect to existing utilities with the exception of site 1 which will be connected to a new septic holding tank.
9.Surrounding Land Uses & Setting:	Refer to Chapter 3 of this document (Section IX, Land Use Planning)
10.Approval Required by Other Public Agencies	Refer to Chapter 2, Section 2.9

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

Aesthetics	Air Quality
Biological Resources	Geology/Soils
Hazards & Haz Materials	Hydrology/Water Quality
Noise	Transportation/Traffic
Utilities	Wildfire

Mandatory Findings of Significance: None

DETERMINATION

On the basis of this initial evaluation:

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

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.

_____ _____

Dan Falat **Date**
District Superintendent

ENVIRONMENTAL ISSUES

I. AESTHETICS

ENVIRONMENTAL SETTING

All four sites are located in non-urbanized areas, and sites 1,3, and 4 are located within public viewing areas. Hearst San Simeon State Historical Monument is a National Historic Landmark and California Historical Landmark. The monument's features of historical significance include the architecture, formal gardens, and scenic views and vistas found at numerous lookout points across the property. The hilltop property is visible to the public from Highway 1 (approximately 3 miles to the west), a State Scenic Highway, and is visible to Hearst Ranch employees and guests from the surrounding Hearst Ranch Property. However, the two proposed modular project sites on the hilltop property (the Elephant Hill New Office Modular site and the Guide Office Complex Replacement site) are not visible from Highway 1. Both projects are partially visible from on-site public tour groups and the Elephant Hill New Office Modular Project is also partially visible from the Hearst Ranch.

The Hearst Castle Visitor's Center is located adjacent to Highway 1, with a large parking lot separating the Visitor's Center and District staff offices from the highway. The District Office Complex project site is partially obscured from the public use area by trees and shrubs.

The San Simeon State Park Campground includes coastal scrub, oak tree clusters, and grasslands. It is located adjacent to Highway 1, though much of the property is obscured by trees and shrubs.

The lighting at each project location consists of standard external institutional lighting that is not shielded or dark sky compliant. The new modulars will contain shielded, down-cast lights that do not illuminate horizontally and are dark sky compliant.

The project includes four distinct sites comprising different elements. The three sites are as follows:

Site 1 This phase of the project will install a newly constructed office complex on Elephant Hill consisting of three (3) fire code and ADA compliant modulars with fire sprinklers totaling approximately 6,912 square feet. Elephant Hill is a staff services area on the eastern edge of the Hearst Castle property. The area is partially visible to public tours from the tennis court (see Appendix A. Project Design Graphics and Visual Assessments) but is not directly accessed by the tours. The new modular buildings will be installed in the eastern portion of this area, farthest from tour access.

As visual assessments and on-site photographs indicate (see appendix A), some of the proposed buildings would be screened by existing trees and shrubs. The Project plans call for painting the modulars a brown/earth-tone color to blend into the landscape as much as possible to further minimize the visibility of these new modular buildings. In addition, plans include planting a minimum of 24 native oak trees to screen the new buildings from the Hearst Ranch, and protecting a large, historic Deodar Cedar in place to maintain existing vegetation screening.

Site 2 This phase of the project will demolish and remove six (6) existing (non-historic) structures within the San Simeon Campground consisting of old storage sheds, greenhouses, and a well house. The structures will be replaced with three 24-foot by 44-foot modular buildings totaling approximately 3,168 square feet. San Simeon State Park Campground modular project area is located entirely within a staff services area, which already contains two State employee modular residences. This area is separated from the public campsites by a paved roadway and screened by existing trees and shrubs. The site is in a low-lying area and not visible from Highway 1.

Site 3 This phase of the project will replace three (3) non-historic modular offices totaling_3,100 square feet used by Hearst Castle guides at Hearst San Simeon State Historical Monument with new, energy efficient units that meet current building and accessibility codes. The area of the new modulars will be 4,464 square feet. The Hearst Castle Guide Complex project area has been used as a tour guide staging and rest area since Hearst Castle opened to the public for tours in 1958. The area has expanded over time, gradually increasing the visibility of the guide complex to visitors. This project has been designed to reduce the visibility of the complex by painting the buildings a brown/earth-tone color and installing vegetation screening in between the modular buildings and the entrance road.

Site 4 This phase of the project will replace all existing modular units in the District Office Complex at the base of hill adjacent to the Visitor Center. There are currently five (5) separate offices in the District Complex consisting of 12 units, each 60 feet by 12 feet, totaling 8,640 square feet. They will be replaced by 15 units totaling 10,224 square feet. The site is located across the paved road that is used by tour buses to take public tours to the hilltop and is partially screened by various ornamental tree and shrub landscaping. The project includes the removal of one 30-DBH sycamore tree and 39 small bushes. This vegetation will be replaced with native species that will be located where necessary to screen the offices from the Hearst Ranch and tour bus loading area.

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) Vistas at Hearst San Simeon State Historical Monument include views from Highway 1 to the castle, and from the hilltop property down to the coast. Project plans at site 1 will not impact these views, as the site is set against an elevated area known as China Hill. Coastal views are adjacent to the project site, and the added vegetation screening, building cohesiveness, and paint scheme will reduce visibility of these modulars and decrease any potential distraction from the adjacent scenic vistas. Scenic vistas from Hearst Ranch will not be significantly impacted at site 3 due to the addition of oak trees to screen the new modulars.

b) All four sites are located near or adjacent to Highway 1, a State Scenic Highway. However, each site is set back from the road and/or adequately screened by trees and shrubs, and is not visible from the highway. Less than significant impact.

c) At sites 1, 3, and 4, proposed vegetation screening and the discrete color palate of the proposed modulars will reduce potential degradation of public views from the Hearst Ranch, Highway 1, or from Hearst Castle to the coast to de minimus levels. The paint color of the new modulars and vegetation screening will serve to improve the current conditions of public views. Site 2 is located outside of a public viewing area and is obscured by trees and shrubs. Less than significant.

d) The new modulars being installed at sites 1 and 2 are not anticipated to significantly increase the light or glare at these sites, which are already utilized for staff services and not considered public nighttime viewing areas. Sites 3 and 4 already contain modular buildings, and their replacement with new modulars is not anticipated to cause a significant increase of light or glare in the area. All new structures will utilize shielded, down-cast, dark sky compliant light fixtures. Less than significant.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

AESTH-1: A minimum of 3 native toyon trees and additional oleanders must be planted as deemed necessary by State Parks staff to screen the modulars from the tour route viewshed at the Hearst Castle Guide Complex site. In addition, the modular buildings must be painted a brown/ earth-tone color.

AESTH-2: Modular buildings must be painted a brown/ earth-tone color.

AESTH-3: A minimum of 24 coast live oaks must be planted at Project Site 1, Elephant Hill, each a minimum of 1-gallons, to screen the viewshed from the Hearst Ranch.

AESTH-4: An existing Deodar Cedar must be protected in place throughout the project. This includes placing protective fencing around dripline of the tree and avoiding disturbance to the root structure during construction.

AESTH-5: The non-native tree and 39 shrubs currently located at the District Office site will be replaced with native species that will be located where necessary to screen the offices from the Hearst Ranch and tour bus loading area.

AESTH-6: All exterior lighting at all four sites shall be shielded, down-cast, and dark sky compliant.

MITIGATION MEASURES

None required.

II. AIR QUALITY

This section provides the setting and scope for the environmental impact analysis of the ND 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 sites. 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 sites.

For the analysis of air quality, this ND 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 Office Modular Installation, Relocation, and Replacement Project, 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 sites are 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 sites all fall 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 5). 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).

The closest residential sensitive receptors to the project area are located in the small community of San Simeon south of the project Site.

Table 5: 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
	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 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 6).

Table 6: Thresholds of Significance for Construction

Pollutant	Threshold1		
			Quarterly Tier 2
ROG+NOx (combined)		2.5 tons	**6.3 tons**
Diesel Particulate Matter			**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 7: Thresholds of Significance for Operational Emissions

	ROG (lbs./day)	NOx (lbs./day)	CO (lbs./day)	So2 (lbs./day)	PM10 (lbs./day)	PM (exhaust)
Threshold (lbs./day)	25		550	N/A	25	1.25

Source: APCD CEQA Air Quality Handbook, Table 2-1

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 8: Wind Erodibility of Soils on the Project Sites

Soil	Portion of Soils Found on Project Sites		Wind Erodibility	
			Quantitative Rating[1]	Qualitative Rating
Concepcion loam, 5 to 9 percent slopes	53.4%		5	Moderate
Los Osos-Lodo complex, 30 to 75 percent slopes	18%		5	Moderate
Salinas silty clay loam, 0 to 2 percent slopes, MLRA 14	13.3%		4	Moderate
San Simeon sandy loam, 15 to 30 percent slopes	0.5%		3	Higher
Xererts-Xerolls-Urban land complex, 0 to 15 percent slopes	14.7%		8	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,c) Typical sources of emissions for public facilities include heating, cooking, solvent/paint use, and lawn and yard care equipment and vehicular traffic. No wood or pellet burning stoves or natural gas burning fireplaces are proposed within the facility. Heating is expected to be provided by efficient electric or natural gas furnaces. 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 CalEEMod 2013.2.2 software. The program uses widely accepted emissions estimates to model

emissions from construction and operation of new stationary sources (California Air Pollution Control Officers Association, 2013).

The emissions shown in Table 2 are the total emissions calculated using the CalEEMod model for the project based on the specific square footage for each phase, applying the site acreage to the model (51,600 square feet total), and using default values for the other inputs.

Table 9: Unmitigated Emissions of the Proposed Project Sites (1,2,3,4)

POLLUTANT	ANNUAL EMISSIONS (TONS/YR)	
	CONSTRUCTION	OPERATION
Carbon monoxide (CO)	11.5	5.23
Nitrogen oxides (NOx)	9.74	0.86
Particulate matter (PM_{10})	0.55	0.37
Particulate matter ($PM_{2.5}$)	0.46	0.08
Reactive organic gases (ROG)	0.98	0.86
Sulfur oxides (SO_2)	0.02	0.01

Source: CalEEMod Model Report Run

Based on the CalEEMod results shown in Table 9 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.

b) 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. Numerous energy-efficient and emission-reducing elements will be incorporated, including the following:

- Extensive daylighting through tubular daylighting devices
- Low-flow, automatic-controlled plumbing fixtures
- Other standard CBC Cal-Green design features

d) The nature of the type of development, modular buildings on an enclosed septic and leachfield system, parking and road use in a very rural area of San Luis Obispo County ensures that the Project would not result in any type of emissions that would adversely affect a substantial number of people.

STANDARD PROJECT REQUIREMENTS

- **AQ-1:** During dry, dusty conditions, all active construction areas will be lightly sprayed with dust suppressant to reduce dust without causing runoff.
- **AQ-2:** 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.
- **AQ-3:** All gasoline-powered equipment will be maintained according to the manufacturer's specifications, and in compliance with all state and federal requirements.
- **AQ-4:** Paved streets adjacent to the Site shall either be swept or washed at the end of each day, or as required, to remove excessive accumulations of silt and/or mud that could have resulted from project-related activities.
- **AQ-5:** 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.

PROJECT SPECIFIC REQUIREMENTS
None required.

MITIGATION MEASURES
None required.

III. BIOLOGICAL RESOURCES

This section provides the setting and scope for the environmental impact analysis of the ND for Biological Resources, which contains a discussion on the environmental setting focusing on what resources are present within and adjacent to the Project sites. 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 sites. For the analysis of biological resources, this ND 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 California Environmental Quality Act (CEQA) Guidelines and modified as needed to address potential Project impacts.

This section is written with separate analyses for plant resources and wildlife resources. Each analysis shall review 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 Appendix B. 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 US 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.

All special-status species and their habitats were evaluated for potential impacts from the proposed Covered Bridge Rehabilitation and Restoration Project. 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 2022), the California Native Plant Society's On-line Inventory, Eighth Edition (CNPS 2022), and the U.S. Fish and Wildlife Service 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 staff; Katie Drexhage (Senior Environmental Scientist), Mike Walgren (Senior Environmental Scientist Specialist), and Brad Collins (Environmental Scientist) in April and May, 2023.

Special-status 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 Office Modular Installation, Relocation, and Replacement Project, a desktop literature review has been 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 (USACE). This desktop review was conducted as a basis of analysis for the project.

The Office Modular Installation, Relocation, and Replacement Project 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 with 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).

Plants/Vegetative Communities

Within the project sites and surrounding landscape, numerous plant communities are found – most notably grasslands, riparian woodland, and mixed woodland communities. The project footprint itself would include mainly developed and landscaped areas. The following specific plant communities are identified at or adjacent to the project site:

- **Mixed Disturbed Grassland**
  Mixed disturbed grassland communitie comprise much of the surrounding landscape adjacent to Project Sites 1,2, and 4. These areas of grassland are considered mostly non-native, annual grasslands due to the long history of use of ranching, and the subsequent prevalence of non-native grass and other herbaceous species visually dominating the landscape. Dominant non-native annual species consist of wild oats (*Avena ssp.*), introduced bromes (*Bromus ssp.*), rattlesnake grass (*Briza maxima*), bi heron bill (*Erodium botrys*), foxtail barley (*Hordeum murinum*), and bur clover (*Medicago polymorpha*). These species are common throughout the grasslands, and especially grazed sites.

It is highly likely that precise plant community mapping efforts would yield a greater number of more specific plant communities.

- **Non-Native/Planted Forest Stands**
  Much of the forest at Hearst Castle State Historic Monument surrounding the Castle is a mature forest that is the result of planting efforts which included mostly non-native tree species. This forest type can be found at Project Site 3 adjacent to a planted area known as China Hill. This forest stand is comprised mainly of Eucalyptus species such as blue gum (*Eucalyptus globulus*) as well as Canary Island Pine (*Pinus canariensis*), stone pine (*Pinus pinea*), and black locust (*Robinia pseudoacaia*).

- **Ruderal**
  Areas directly adjacent to the developed sites (1,2,3,4) display plant species that typically dominate disturbed areas. Native species may be entirely absent in ruderal areas, but some natives such as coyote brush (*Baccharis pilularis*) and telegraph weed (*Heterotheca grandiflora*), readily colonize disturbances. Ruderal plants often persist along roadsides and trails and may replace the herbaceaous understory in tree and shrub dominated habitats. Common ruderal species are black mustard (*Brassica nigra*) and thistles, including milk thistle (*Silybum marianum*), Italian thistle (*Carduus pycnocephalus*), bull thistle (*Cirsium vulgare*), and tocalote (*Centaurea melitensis*). Hemlock (*Conium maculatum*) frequently colonizes disturbed wetland margins and fennel (*Foeniculum vulgare*) may spread over large areas of upland habitats.

- **Mixed Woodland**
  At Project Sites 1 and 2, there are areas of surrounding mixed woodland. In these areas outside the project footprint there are native trees including coast live oak (*Quercus agrifolia*) and gray pine (*Pinus sabiniana*) outside the Castle grounds fence next to Site 1 forming a native woodland, and coast live oak and Monterey pine (*Pinus radiata*) in the campgrounds surrounding Site 2.

- **Riparian Woodland**
  Adjacent to Project Site 2 is San Simeon Creek which flows along the boundary of Hearst San Simeon State Park and confluences with the coast at William Randolph Hearst State Beach. Along San Simeon Creek there is a riparian woodland buffer that is comprised mainly of arroyo willow thickets (*Salix lasiolepis*). Intermixed with the willow thickets where the state park campground borders there are also California sycamore trees (*Platanus racemosa*). Upstream of the project site there are other riparian species such as bay laurel (*Umbellularia californica*).

- **Developed/Landscaped**
  The most common conditions of each of the project sites are areas that are developed and landscaped with both native and ornamental vegetation.

  Almost the entire construction and operation footprint of the project exists on these

already developed areas where there are existing roads, utilities, and infrastructure including the current modular that are at Sites 3 and 4. The sites are highly disturbed due to park visitation and staff vehicle use. These sites do not offer substantial suitable habitat for native species; however, some of the landscaped areas that have been planted with species such as citrus trees, oleander, bottlebrush, bailey acacia as well as with natives such as coast live oak and toyon, may provide refuge for certain wildlife species including birds and small mammals.

Special-Status Plant Species

For Site 1 (Elephant Hill New Modulars), Site 3 (Guide Complex Replacement Modulars), and Site 4 (District Office Replacement Modulars), the CNDDB, CNPS[1], and USFWS have identified 25 special status plant species as occurring or having a potential to occur within the Burnett Peak, Burro Mountain, Bryson, Cambria, Pebblestone Shut-In, Pico Creek, Piedras Blancas, and San Simeon USGS 7.5-minute quadrangles. For Site 2 (San Simeon Campground New Modulars), CNDDB, CNPS[1], and USFWS have identified 25 special status plant species as occurring or having a potential to occur within the Cambria, Cayucos, Cayucos OE W, Cypress Mountain, Lime Mountain, Pebblestone Shut-In, Pico Creek, and San Simeon USGS 7.5-minute quadrangles. These species, including their listing status and potential for occurrence in the project areas, are identified in Appendix B, Tables 1 & 2.

Of the 40 species identified as having the possibility to occur in the project sites by CNDDB and IPAC, 7 species have been determined to possibly be present based on suitable habitat adjacent to the project sites assessed during biological desktop review and field surveys. These 7 species are discussed below:

Saints' Daisy

Saint's Daisy (*Erigeron sanctarum*) is a rare (CNPS Rank 4.2) plant species that is endemic to California and known to occur in San Luis Obispo and Santa Barbara County as well as Santa Rosa and Santa Cruz Islands. Saint's Daisy grows in coastal and inland chaparral and oak woodland, and sandy coastal scrub habitat.

Due to the disturbed condition of the project sites, there is a low likelihood of Saint's Daisy occurring. The species has not been observed within or adjacent to the project site during field surveys. Impacts to this species are not anticipated.

Most beautiful jewelflower

Most beautiful jewelflower (*Steptanthus albidus ssp. peramoenus*) is a rare (CNPS Rank 1B.2) plant species that occurs in the coast ranges of central California. The species is typically found on serpentine soils in open areas such as chaparral, valley grassland, and foothill woodlands, along a narrow band of the Santa Lucia Range in Monterey and San Luis Obispo Counties.

Due to the disturbed condition of the project sites, there is a low likelihood of most beautiful jewelflower occurring. The species has not been observed within or adjacent to the project site during field surveys. Impacts to this species are not anticipated.

Palmer's spineflower

Palmer's spineflower (*Chorizanthe palmeri*) is a rare (CNPS Rank 4.2) plant species that occurs along the central coast in Monterey, San Luis Obispo, and Santa Barbara Counties. The species is typically found in foothill woodlands, chaparral, and valley grasslands.

Due to the disturbed condition of the project sites, there is a low likelihood of Palmer's spineflower occurring. The species has not been observed within or adjacent to the project site during field surveys. Impacts to this species are not anticipated.

Carlotta hall's lace fern

Carlotta Hall's lace fern (*Apsidotis Carlotta-halliae*) is a rare (CNPS Rank 4.2) perennial fern that is endemic to California where it is found in the central coast ranges and coastal hillsides, typically on serpentine soils. This species is a fertile hybrid between *Aspidotis californica* and *Aspidotis densa*.

Due to the disturbed condition of the project sites, there is a low likelihood of Carlotta hall's lace fern occurring. The species has not been observed within or adjacent to the project site during field surveys. Impacts to this species are not anticipated.

San Luis Obispo Sedge

San Luis Obispo Sedge (*Carex obispoensis*) is a rare (CNPS Rank 1B.2) grass-like plant that grows in bunches. The species is known to occur throughout the Los Padres National Forest along Cuesta Ridge and Willow Creek as well as within the Salinas Watershed. It is also known to occur near the border Monterey County. This species typically grows in wetlands but can also be found in chaparral, coastal scrub, and coastal prairie habitats. The species faces threats from grazing, feral pigs, road and trail construction, competition from other native and non-native plants, and other development.

Due to the disturbed condition of the project sites, there is a low likelihood of San Luis Obispo Sedge occurring. The species has not been observed within or adjacent to the project site during field surveys. Impacts to this species are not anticipated.

Monterey Pine

Monterey Pine (*Pinus radiata*) is a rare (CNPS Rank 1B.1) tree species whose native range is endemic to the central coast of California ranging from the Monterey Peninsula south along the coast to the town of Cambria. The species is known to occur outside of its range along other stretches of California's coast where is has commonly been planted and subsequently naturalized in other plant communities.

The species faces threats from development, fuel loading from fire suppression, insect pests, and fungal diseases such as pine pitch canker.

The species can be observed around Project Site 2 where it forms a codominant canopy in the San Simeon Creek Campground. The species also occurs adjacent to the project site throughout Hearst San Simeon State Park where it has developed into a mature forest stand. No trimming or removal of Monterey pine trees is anticipated at either project site; therefore, impacts to this species are not anticipated.

Coast Live Oak

Because the Project Sites are located within the North Coastal Planning Area of the Coastal Zone, coast live oak trees (*Quercus agrifolia*) are protected by the California Coastal Act (see III.II Regulatory Setting) and impacts to this species must be avoided, minimized, and/or offset at a 6:1 ration. A total of four (4) native coast live oak trees will be removed as a result of the proposed Project. Two of the trees have an approximately 12-inch diameter at breast height (dbh), one has a dbh of10 inches and one has a dbh of 8 inches. In accordance with the North Coast Planning Area, a total of 24 coast live oak trees must be planted to offset the loss of those individuals. The proposal to plant 24 oak trees is included as part of the project description and a planting plan is located in Appendix A.

Special-Status Wildlife Species

Within the project sites and surrounding landscape, suitable habitat for numerous wildlife species is present – most notably grasslands, riparian woodland, and mixed woodland/forest communities. The project footprint itself would include mainly developed and landscaped areas. These areas may have the potential to provide habitat for certain special status wildlife species.

For Site 1 (Elephant Hill New Modulars), Site 3 (Guide Complex Replacement Modulars), and Site 4 (District Office Replacement Modulars), the CNDDB and U.S. Fish and Wildlife Service (USFWS) have identified 18 special status wildlife species as occurring or having a potential to occur within the Burnett Peak, Burro Mountain, Bryson, Cambria, Pebblestone Shut-In, Pico Creek, Piedras Blancas, and San Simeon USGS 7.5-minute quadrangles. For Site 2 (San Simeon Campground New Modulars), the CNDDB, and USFWS have identified 24 special status wildlife species as occurring or having a potential to occur within the Cambria, Cayucos, Cayucos OE W, Cypress Mountain, Lime Mountain, Pebblestone Shut-In, Pico Creek, and San Simeon USGS 7.5-minute quadrangles. These species, including their listing status and potential for occurrence in the project areas, are identified in Appendix B, Tables 3 & 4.

Of the 31 species identified as having the possibility to occur in the project sites by CNDDB and IPAC, 21 species have been determined to be possibly present based on suitable habitat adjacent to the project sites, as discussed below:

Invertebrates
As part of biological desktop review and field surveys, two special status/ sensitive invertebrate species were identified as potentially being present based on suitable habitat.

- **Monarch butterfly**
  The California overwintering population of monarch butterfly (*Danaus plexippus*) is a candidate for federal listing. Monarchs overwinter in roost sites that extend along the Pacific coast from northern Mendocino County to Baja California, Mexico. Roosts are located in wind-protected tree groves (typically eucalyptus, Monterey pine, or Monterey cypress), with nectar and water sources nearby (Xerces Society 2022).

  There is a low potential for monarchs to be impacted by the project. Monarchs are occasionally seen flying around these proposed project sites, but suitable roosting habitat is not present. All three sites are developed and lack stands or groves of trees.

- **Obscure bumble bee**
  The obscure bumble bee (*Bombus caliginosus*) is a sensitive pollinating bee species. It is not listed as threatened or endangered under the Federal or State Endangered Species Acts but is currently categorized as vulnerable by the International Union for Conservation of Nature.

  This species occurs along the Pacific Coast, from southern California to southern British Columbia, with scattered records from the east side of California's Central Valley (Xerces Society 2022). The species is typically found in open grassy coastal prairies and coast range meadows where plants such as *Ceanothus*, *Cirsium*, *Clarkia*, *Keckiella*, *Lathyrus*, *Lotus*, *Lupinus*, *Rhododendron*, *Rubus*, *Trifolium*, and *Vaccinium* are present (Williams et al. 2014).

  There is potential for this species to occur within or near the proposed project sites as they are occasionally seen flying around the general area.

Amphibians
As part of biological desktop review and field surveys, three special status/sensitive amphibian species were identified as potentially being present based on suitable habitat present within or nearby the project sites.

- **California Red-Legged Frog**
  The California red-legged frog (*Rana draytonii*) is a federally threatened species that occurs in lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. It typically inhabits quiet pools of streams, marshes, and ponds.

All life history stages are most likely to be encountered in and around breeding sites, which include coastal lagoons, marshes, springs, permanent and semi-permanent natural ponds, and ponded and backwater portions of streams, as well as artificial impoundments such as stock ponds, irrigation ponds, and siltation ponds. The CRLF can disperse up to two miles from breeding ponds. Eggs are typically deposited in permanent pools, attached to emergent vegetation.

This species typically requires 11 to 20 weeks of permanent water for larval development and must have access to estivation habitat. Suitable upland habitat must provide sufficient moisture to prevent desiccation and sufficient cover to provide protection from predators. Typical upland habitat consists of densely vegetated areas, downed woody vegetation, leaf litter, small mammal burrows, and human-made structures (i.e., culverts, livestock troughs, spring-boxes, abandoned sheds) (USFWS 2002).

Suitable freshwater and riparian habitat for CRLF is absent within the project sites; however, there are two creeks, San Simeon Creek and Arroyo del Puerto, near the project sites where CRLF have a moderate potential to occur. However, local experience from multiple sources documented CRLF in streams within the vicinity of the four project sites. Data from a 5/12/23 CNDDB query shows that two of the occurrences were documented in San Simeon Creek and/or Arroyo del Puerto.

- **San Simeon Slender Salamander**
  The San Simeon slender salamander (*Batrachoseps incognitus*) is a rare species that is endemic to the central coast of California. Found only in the Santa Lucia Mountains in northwestern San Luis Obispo County and southwestern Monterey County. The northern and eastern range limits in Monterey County are not yet known, extending at least as far north as Prewitt Creek.

  The species is typically found in open and closed forests of yellow pine, laurel, sycamore, and oak woodland at elevations that range from sea level to 3,300 ft. No significant threats are known to this species, but its small range on mostly private property and its similarity to other species make it difficult to survey and get a clear picture of its status. Though the species can be found at Hearst San Simeon State Park where Project Site 2 is located, the project site itself is outside the area of suitable forest habitat where the species has been observed.

- **Coast Range newt**
  The Coast Range newt (*Taricha torosa*) is a California species of special concern due to habitat loss and alteration caused by human activity and from introduced predatory species. The Coast Range newt is endemic to California and its range includes both the northern and southern coast ranges of California.

  The species is typically found in wet forests, oak forests, chaparral, and rolling grassland. In southern California, the species will utilize drier chaparral, oak

woodland, and grasslands. Regardless of habitat type, the species requires aquatic environments for reproduction. Following metamorphosis, juveniles will leave their natal pond and will seek refuge in upland habitat until they return for breeding.

There is low potential for the project to result in impacts to coast range newt. There is no suitable habitat within the project site as the site is developed and landscaped with unsuitable vegetation needed for adult refugia. Potential breeding habitat occurs 1,400 feet downslope of the project site at Arroyo del Puerto however it is unlikely that the species would migrate that far upland to seek refugia at a disturbed site.

Mammals

As part of biological desktop review and field surveys, six special status/ sensitive mammal species were identified as potentially being present based on suitable habitat.

- **Pallid bat**

  The pallid bat (*Antrozonous pallidus*) is a California species of special concern. The species has a large range that extends from British Columbia through the western United States to central Mexico. In the United States, they occur along the western coast in Washington, Oregon, and California and as far east as west Texas, Oklahoma, southern Wyoming, and southern Idaho.The pallid bat is mostly found in desert or dry habitats. They roost in a variety of places but favor rocky outcrops. They also occur in oak and pine forested areas and open farmland. Roosting sites are variable, depending on what is available. They can be found roosting in caves, rock crevices, mines, hollow trees, and buildings.

  The species has been observed roosting at Hearst Castle in several building structures however no impacts are anticipated for the species as the project does not propose any alteration or maintenance of existing structures or vegetation removal that could impact known roosting sites.

- **Townsend’s big-eared bat**

  The Townsend’s big-eared bat (*Corynorhinus townsendii*) is a California species of special concern due to population decline from destruction and disturbance of roost sites. The Townsend's big-eared bat occurs throughout the west and is distributed from the southern portion of British Columbia south along the Pacific coast to central Mexico and east into the Great Plains, with isolated populations occurring in the central and eastern United States.

  Townsend’s big-eared bat has been reported in a wide variety of habitat types ranging from sea level to 3,300 meters. Habitat associations include: coniferous forests, mixed meso-phytic forests, deserts, native prairies, riparian communities, active agricultural areas, and coastal habitat types.
  Distribution is strongly correlated with the availability of caves and cave-like roosting habitat, with population centers occurring in areas dominated by exposed,

cavity forming rock and/or historic mining districts. They prefer open roosting areas in large rooms and do not tuck themselves into cracks and crevices like many bat species do.

The species has been observed roosting at Hearst Castle in several building structures; however, no impacts are anticipated for the species as the project does not propose any alteration or maintenance of existing structures or vegetation removal that could impact known roosting sites.

- **Long-eared myotis**
  The long-eared myotis (*Myotis evotis*) is a sensitive bat species whose range includes much of the western United States from the Pacific Coast to the front range of the Rocky Mountains and western Dakotas. The geographic range reaches up into the lower Canadian provinces of British Columbia, Saskatchewan and Alberta and south into central New Mexico and Arizona.

  Long-eared myotis is most commonly found in mixed coniferous forests, from humid coastal areas to montane forests. Elevation ranges from sea level on the Pacific Coast to 2,830 meters in the mountains of Wyoming. The species typically roosts in pine tree stumps or snags but will day roost in abandoned buildings, cracks in the ground, caves, mines, and loose bark on living and dead trees.

  The species has been observed roosting at Hearst Castle in several building structures; however, no impacts are anticipated for the species as the project does not propose any alteration or maintenance of existing structures or vegetation removal that could impact known roosting sites.

- **Fringed myotis**
  The fringed myotis (*Myotis thysanodes*) is a sensitive bat species whose range extends from British Columbia through the western United States into Mexico.

  The fringed myotis is a highly migratory species that roosts in caves, mine tunnels, rock crevices and old buildings. The most common habitats include oak, pinyon, and juniper woodlands or ponderosa pine forest at middle elevation. Their winter habitat is largely unknown.

  The species has been observed roosting at Hearst Castle in several building structures however no impacts are anticipated for the species as the project does not propose any alteration or maintenance of existing structures or vegetation removal that could impact known roosting sites.

- **Long-legged myotis**
  The long-legged myotis (*Myotis volans*) is a sensitive bat species whose range extends from southeastern Alaska through the western United States into Mexico.

The long-legged myotis is most commonly found at elevations from 2000 to 3000 metersin coniferous forests. They are occasionally found in riparian or desert habitats, trading tree roosts for abandoned buildings and caves. The most commonly observed roosts are snags, which are favorable due to the dead, peeling bark.

The species has been observed roosting at Hearst Castle in several building structures; however, no impacts are anticipated for the species as the project does not propose any alteration or maintenance of existing structures or vegetation removal that could impact known roosting sites.

- **Yuma myotis**
  The Yuma myotis (*Myotis yumanensis*) is a sensitive bat species found in western North America, ranging from British Columbia to Central Mexico and eastward to Colorado.

  Yuma myotis is found in a variety of habitats, ranging from juniper and riparian woodlands to desert regions near open water. One is almost guaranteed to find this species wherever there are rivers, streams, ponds, lakes, etc. The species is more closely associated with water than any other North American species of bat. When nearby water is not present, this species can be found roosting in caves, attics, buildings, mines, underneath bridges, and other similar structures.

  The species has been observed roosting at Hearst Castle in several building structures however no impacts are anticipated for the species as the project does not propose any alteration or maintenance of existing structures or vegetation removal that could impact known roosting sites.

Birds
As part of biological desktop review and field surveys, seven special status/ sensitive bird species were identified as potentially being present based on suitable habitat.

- **Great egret**
  The great egret (*Ardea alba*) is a migratory bird species whose populations were decimated by plume hunters in the late 1800s but recovered rapidly with protection early in 20th century. In recent decades, breeding ranges have been expanding gradually northward, while there is some evidence that southern populations have declined (Audubon Society, 2013).

  The great egret is found in marshes, ponds, shores, mud flats. The species usually forages in rather open situations, such as along edges of lakes, large marshes, shallow coastal lagoons and estuaries; also along rivers in wooded country. It usually nests in trees or shrubs near water, sometimes in thickets some distance

from water, sometimes low in marsh. The breeding season for these birds lasts from April to September. They nest in colonies in the tops of trees or shrubs often alongside other species.

This species could potentially utilize San Simeon Creek near Project Site 2 as habitat. No work is planned within the San Simeon Creek riparian zone and no vegetation removal is planned at this site.

- **Western snowy plover**
  The western snowy plover (*Charadrius nivosus nivosus*) is a federally threatened and a CDFW SSC. This small shorebird is about six inches long, with a thin dark bill, pale brown to gray upper parts, white or buff colored belly, and darker patches on its shoulders and head, and white forehead and eyebrow. The Pacific coast population of the western snowy plover breeds primarily on coastal beaches from southern Washington to southern Baja California, Mexico. The population breeds above the high tide line on coastal beaches, sand spits, dune-backed beaches, sparsely vegetated dunes, beaches at creek and river mouths, and salt pans at lagoons and estuaries (USFWS 2022a).

  There is a low potential for the western snowy plover to fly over or forage within the Study Area. There is a nesting site documented in the CNDDB approximately 1.6 miles west of the Study Area, in Arroyo Laguna Beach, south of Adobe Creek (CDFW 2022a). This nesting site is not utilized by the species every year.

- **California gull**
  The California gull (*Larus californicus*) is a medium sized, migratory gull species that breed in the Northwest areas of North America and migrate down the Pacific coast in the winter. Their breeding habitat is lakes and marshes. During the winter they are found along the seacoasts, estuaries, bays, mudflats, near rivers, around farms and plowed fields, and even garbage dumps. They are active during the day spending most of their time feeding while flying, walking, wading, swimming and even diving for food. These birds also scavenge at garbage dumps, marinas, and docks.

  This species does occur along the coast near the Project sites and may be seen flying within the project sites.

- **California brown pelican**
  The California brown pelican (*Pelecanus occidentalis*) is a State fully protected species that was both federally and state delisted. The species lives year-round in estuaries and coastal marine habitats along the California coast, and forage, rest, and roost on islands, offshore rocks, breakwaters and other humanmade structures, rocky intertidal areas, mudflats, and beaches. The species generally nests and breeds on offshore Islands in southern California. Diet includes mostly small fish that school near the surface of the water. Brown pelicans spot fish from the air and dive head-first from as high as 65 feet over the ocean before plunging

into the water and expanding their throat patch to trap fish (Cornell Lab of Ornithology 2022).

California brown pelicans are present on the San Simeon Coast next to the project sites, however the project sites do not provide suitable habitat for the species.

- **Double-crested cormorant**
  The double-crested cormorant (*Nannopterum auritumis*) is a CDFW watchlist species that forms breeding colonies in clusters of trees near large bodies of water. Diet consists primarily of fish, which they catch by diving and chasing their prey underwater with powerful propulsion from webbed feet. After fishing, the birds rest on high, airy perches to dry off and digest (Cornell Lab of Ornithology 2022).

  This species could potentially utilize San Simeon Creek near Project Site 2 as habitat. No work is planned within the San Simeon Creek riparian zone and no vegetation removal is planned at this site.

Fish
As part of biological desktop review and field surveys, two special status/ sensitive fish species were identified as potentially being present based on suitable habitat.

- **Tidewater goby**
  The tidewater goby (*Eucyclogobius newberryi*) is a federally endangered species known to occur along the California coast from the mouth of the Smith River in Del Norte County, south to Agua Hedionda Lagoon in San Diego County. Tidewater gobies generally inhabit lagoons, estuaries, marshes, and coastal streams that are protected from the Pacific Ocean by sandbars creating cool, brackish water conditions, preferably with nearby emergent vegetation.

  Salinities under 10 parts per thousand (ppt) are favorable although this species has been found in the upper reaches of streams which are tributaries to brackish water. The species may occur in groups under a dozen or in large aggregations of several hundred.
  Habitat with sandy bottom substrate is preferred to allow subsurface burrowing by males prior to mate selection. Tidewater goby complete life cycles annually with adults rarely exceeding two inches in length. Threats to the goby include sandbar breaching for tidal flushing, wetland draining, and pollutant accumulation in lagoons (Rincon 2022).

  This species could potentially utilize San Simeon Creek near Project Site 2 as habitat. No work is planned within the San Simeon Creek riparian zone and no vegetation removal is planned at this site.

- **South-Central California Coast steelhead**
  The South-Central California Coast distinct population segment (DPS) of

steelhead (*Oncorhynchus mykiss*) refers to runs of steelhead in coastal basins from the Pajaro River south to, but not including, the Santa Maria River, which are all federally threatened. Steelhead are the anadromous (ocean-going) form of rainbow trout. They occur in freshwater systems and require adequate water conditions (i.e., adequate flow, high dissolved oxygen levels within the surface water, and cool water temperature) and suitable substrate (i.e., gravels) for spawning. Adults spawn in freshwater and juveniles rear in freshwater before migrating to the ocean to grow and sexually mature prior to returning as adults to reproduce in freshwater, often in their natal stream.

Steelhead populations along the West Coast of North America have experienced substantial declines as a result of human activities, including water development, flood control programs, forestry practices, agricultural activities, mining, and urbanization that have degraded, or fragmented aquatic and riparian habitats (NOAA 2013).

Reptiles

As part of biological desktop review and field surveys, one special status/ sensitive reptile species was identified as potentially being present based on suitable habitat.

- **Two-Striped Garter Snake**
  The two-striped garter snake (*Thamnophis hammondii*) is a CDFW SSC that typically inhabits water features such as ponds, creeks, and cattle tanks within oak woodlands, willows, coastal sage scrub, scrub oak and chaparral. The species ranges from 24 to 40 inches long with olive, brown or dark gray coloring. The mating season occurs in late March to early April.

- **Southwestern Pond Turtle**
  The southwestern pond turtle (*Actinemys pallida*) (SWPT) is a CDFW species of special concern. This turtle species ranges from 3 to 9 inches in shell lengths. Post-emergent hatchlings are approximately 1 inch in shell length. The turtle species typically has a dark brown, olive brown or blackish coloring with a low unkeeled carapace. SWPTs are typically active from February through September. SWPTs occur in ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches with abundant vegetation. The species is often seen on a log or rock basking above the water. The mating season for pond turtles occurs in April and May. The nesting period for pond turtles is from late April to August.

  Nesting habitat is usually in areas of sparse vegetation consisting of grass and forbs, with compact soil composed of clay or silt fraction, or sandy loam and sometimes gravel/cobble mixed with soil (Holland 1994, Rathburn et al. 2002). Nesting habitat is also characterized by good sun exposure with little to no tree canopy cover. Most nest sites are along the streambank and/or pond bank within 200 meters (m) of the aquatic habitat. Nests are shallow, approximately 7 to 12

centimeters (cm) below the surface. The female pond turtles lay a clutch of 1 to 13 eggs but generally 6 eggs per clutch (Stebbins 2003). Some female pond turtles lay two clutches in a year while other females lay eggs every other year. The incubation period is unknown; however, in a laboratory the eggs hatched in 73-81 days (Ernst et al. 2009). Typically, the hatchlings overwinter in the natal nests and emerge the following spring (Holland 1994, Nagle et al. 2004, Bury and Germano 2008).

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

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. The USFWS determines which species are listed for protection under this act and is the main regulatory agency 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 the US Fish and Wildlife Service with assistance from the National Marine Fisheries Service.

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 in conjunction with the National Marine Services.

Section 10
Section 10 provides a means for a non-federal action that has potential to result in the take of a special status 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) is a domestic law created to protect migratory birds and their migration pathways, as well as prevent unlawful take of any individual animal. It was developed to affirm the United States commitment to four international conventions, along with Canada, Mexico, Japan, and Russia, for the protection of a shared migratory bird resource. Under the MBTA, it is illegal anywhere in the United States to pursue, hunt, take, capture, or kill any migratory bird by any means or
manner. 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 then 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 Section 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 the USFWS or DFG formally protects the species by listing them as threatened or endangered.

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 California Coastal Commission, 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.

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 Game (CDFG). 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 CDFG determines that the federal incidental take authorization is consistent with the CESA under California Fish and Game Code Section 2080.1. If a Project will only impact species listed solely in California, the Project Applicant may apply for a take permit under Section 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 CDFG. 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 CDFG 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 CDFG 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 CDFG 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 CDFG 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 CDFG.

The CDFG will make a final decision regarding its permits using available scientific data while considering the species' ability to survive and reproduce.

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 CDFG 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 CDFG 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 11-13. 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.

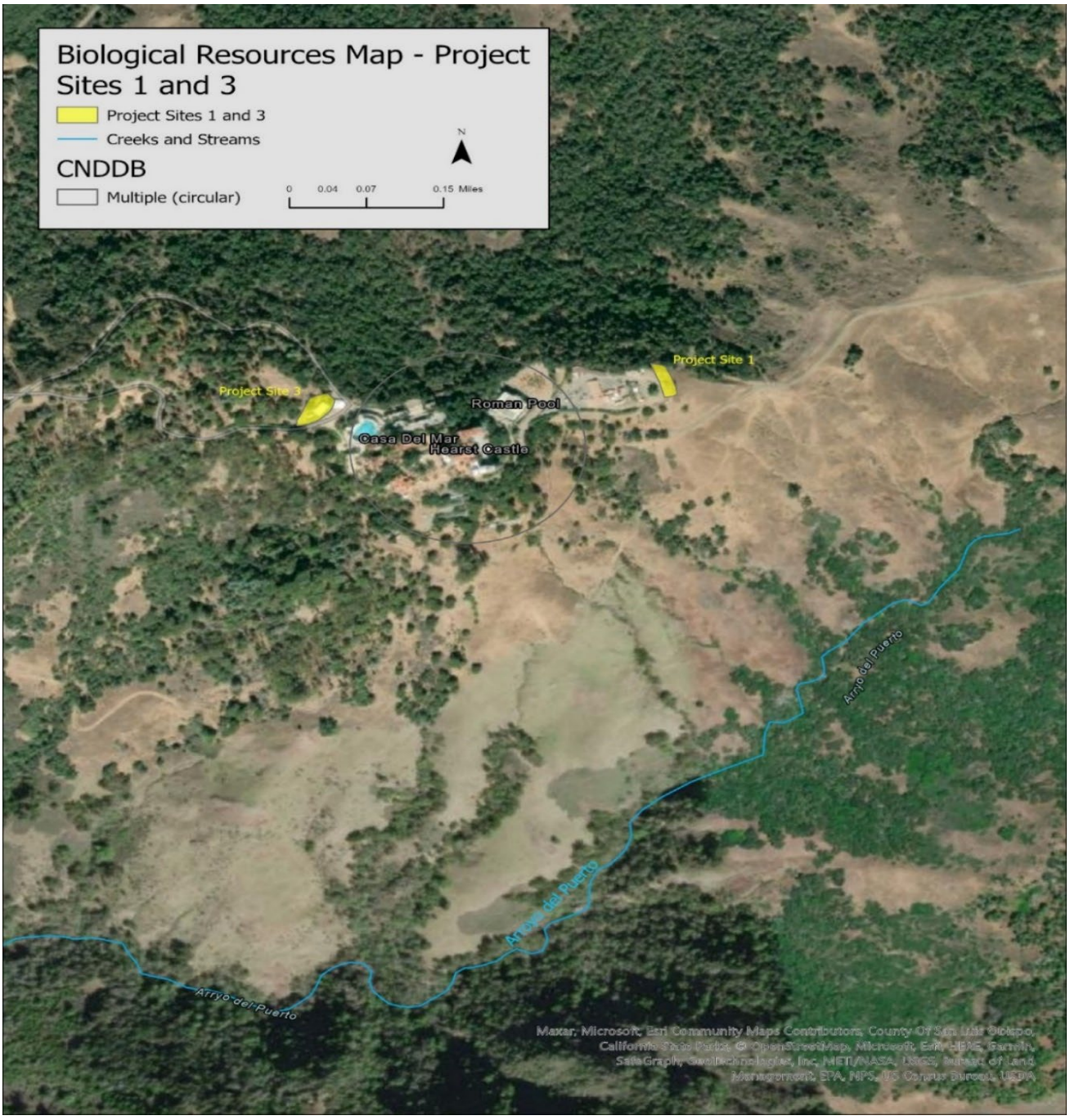

Figure 19. Biological Resources Map for Project Site 1 (Elephant Hill Modulars) and Site 3 (Guide Complex Modulars).

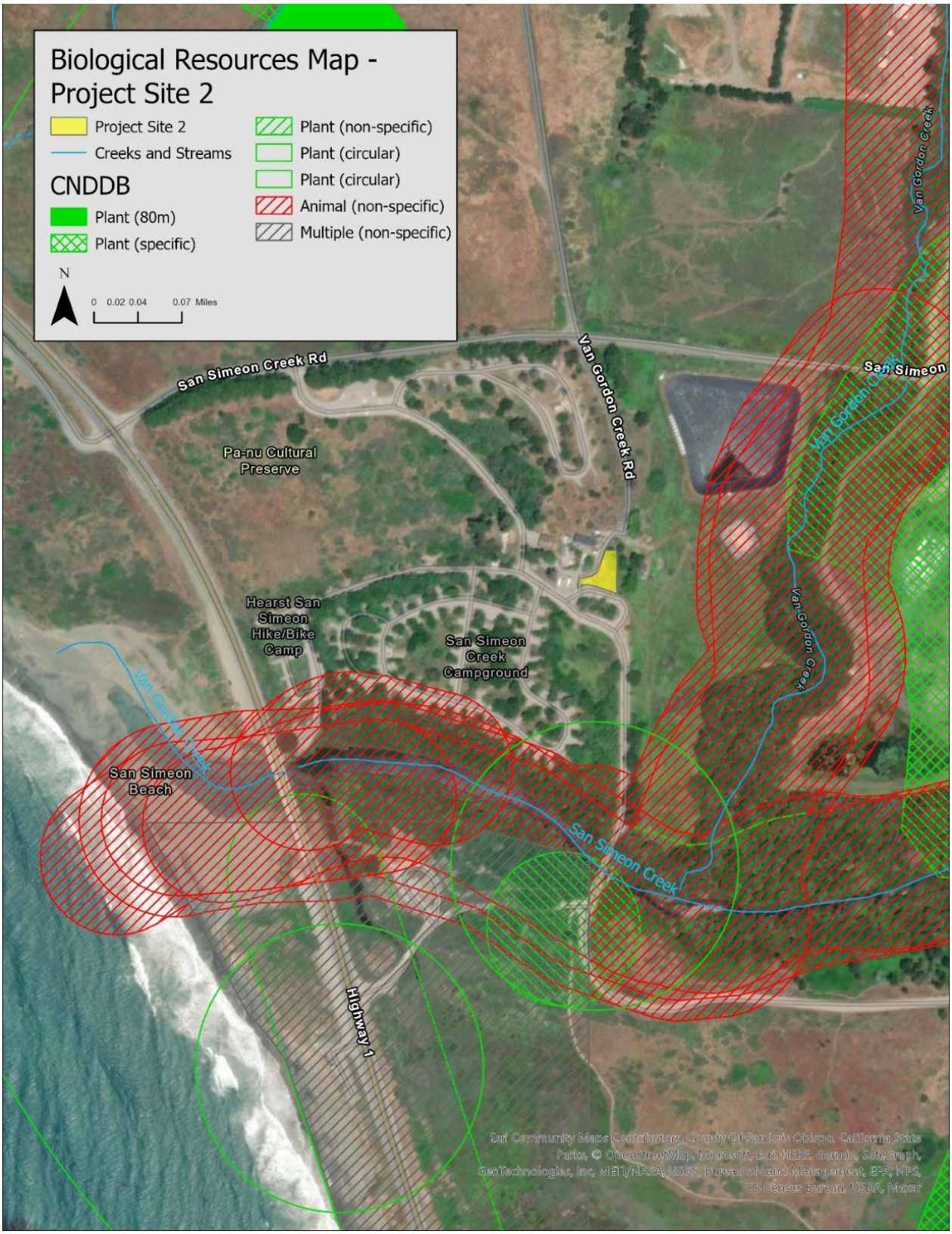

Figure 20. Biological Resources Map for Project Site 2 (San Simeon Creek Modulars)

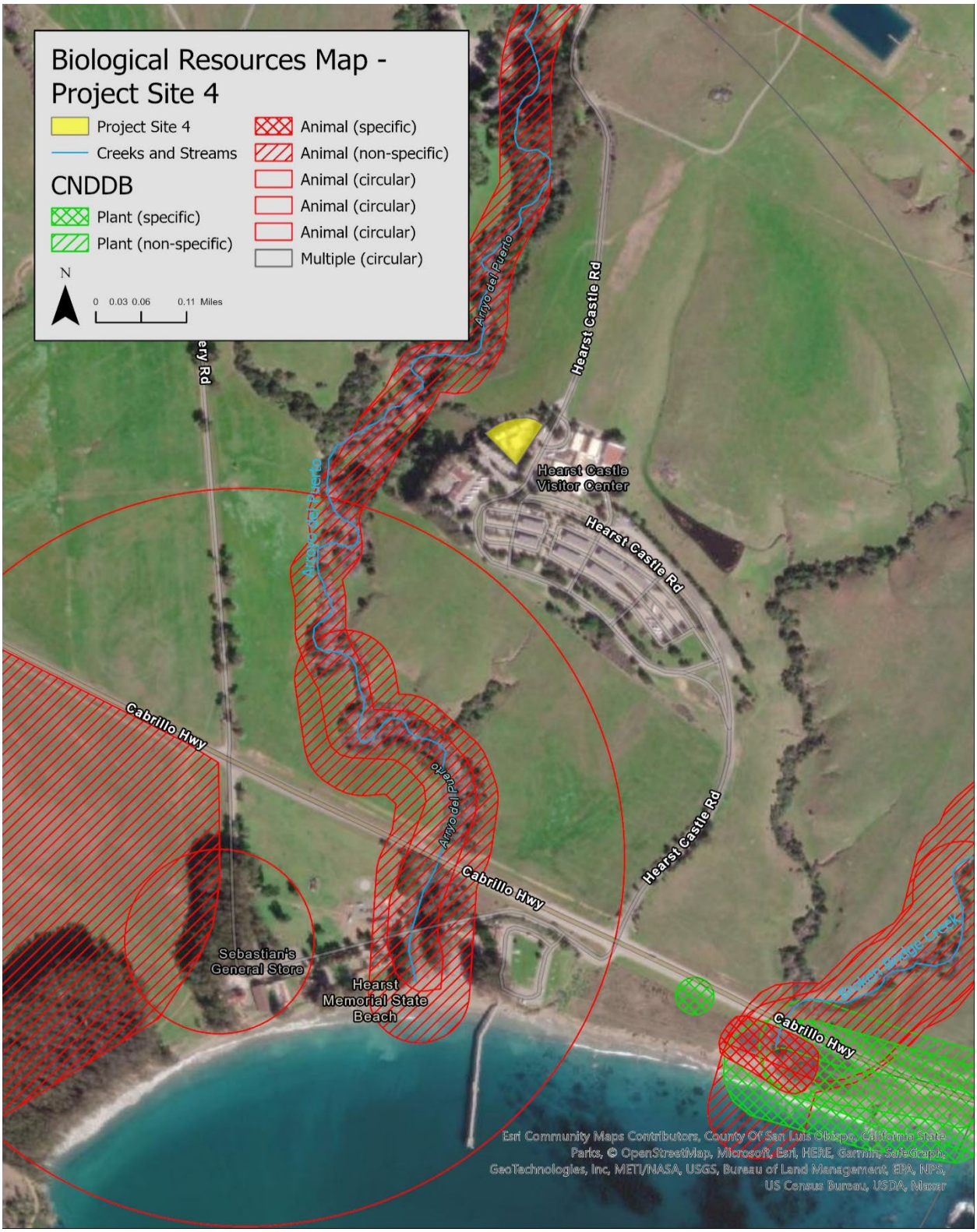

Figure 21. Biological Resources Map for Project Site 4 (District Office Modulars)

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	LESS 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 federally protected wetlands as defined by Section 404 of the Clean Water Act (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. 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) The project sites are located in developed areas with very little native habitat present. No sensitive habitats or natural communities are located within the Project sites; however, there is suitable aquatic habitat within dispersal distance of sensitive species including but not limited to California red-legged frogs and southwestern pond turtles. The loss of four (4) native oak trees in the Coastal Zone will be offset by planting 24 native oak trees, in accordance with local and State Coastal regulations. However, implementation of the recommended standard and project specific requirements (below) will ensure that impacts at this threshold are avoided.

Individual species analyses are followed below:

obscure bumble bee (Bombus caliginosus)

There is potential for this species to occur within or near the proposed project sites as they are occasionally seen flying around the general area. No vegetation removal of habitat plant species is proposed, therefore impacts to the species are not anticipated.

California red legged frog (Rana draytonii)

The CRLF has a low potential to occur during times of dispersal (November to April, during or after a rainfall) within either project site. Exclusionary fencing will ensure that no impacts to this species occur if construction activities occur during the dispersal period.

San Simeon slender salamander (Batrachoseps incognitus)

Though the species can be found at Hearst San Simeon State Park where Project Site 2 is located, the project site itself is outside the area of suitable forest habitat where the species has been observed. Impacts to this species are not anticipated.

great egret (ardea alba)

No work is planned within the San Simeon Creek riparian zone and no vegetation removal is planned at this site, therefore impacts to this species are not anticipated.

western snowy plover (Charadrius nivosus nivosus)

Impacts to this species are not anticipated.**California gull (Larus californicus)**

Impacts to this species are not anticipated.

California brown pelican (Pelecanus occidentalis)

Impacts to this species are not anticipated

double-crested cormorant (Nannopterum auritumis)

No work is planned within the San Simeon Creek riparian zone and no vegetation removal is planned at this site, therefore impacts to this species are not anticipated

tidewater goby (Eucyclogobius newberryi)

No work is planned within the San Simeon Creek riparian zone and no vegetation removal is planned at this site, therefore impacts to this species are not anticipated.

South-Central California Coast distinct population segment (DPS) of steelhead (Oncorhynchus mykiss)

This species is known to utilize San Simeon Creek near Project Site 2 as habitat. No work is planned within the San Simeon Creek riparian zone and no vegetation removal is planned at this site, therefore impacts to this species are not anticipated.

two-striped garter snake (Thamnophis hammondii)

According to the San Luis Obispo Coast District North Coast Acquisitions Natural Resources Inventory (CDPR 2008), the species has been documented in Arroyo del Puerto and San Simeon Creek. A CNDDB query from 5/12/23 shows records of the species in both the Cambria and San Simeon USGC 7.5-minute quads. Though there is suitable habitat near the project sites There is a low potential for this species to occur within Project Sites since Arroyo del Puerto and San Simeon Creek are approximately 0.13 to 0.47 miles from the Project sites.

southwestern pond turtle (Actinemys pallida)

SWPT has a low potential to occur within the Study Area. The species has been observed by State Parks personnel for multiple years (California State Parks 2007). The species has been observed in the two creeks near the Project sites: San Simeon Creek is 0.15 miles from Site 2 and Arroyo del Puerto is 0.28 miles from Site 1, 0.47 miles from Site 3, and 0.13 miles from Site 4 of the Study Area. Within the Project sites, there is not suitable aquatic habitat present. This species has a low potential to occur during times of dispersal (November to April, during or after a rainfall) within either project site. Exclusionary fencing (i.e., ESA fencing, see Figures 14 &15) will ensure that no impacts occur to this species if construction activities occur during the dispersal period. Impacts to this species are not anticipated.

b) The project will not impact jurisdictional waterways or riparian habitat. No impacts are anticipated for this threshold.

c) The project does not propose any activities that would impact waterways or significant terrestrial habitat, therefore the project would not 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) No sensitive habitats or natural communities are located within the Project sites; however, there are sensitive areas located near the project sites. The Project description does include removal of four native coast live oaks. 24 coast live oaks will be replanted pursuant to the San Luis Obispo County North Coast Area Plan.

STANDARD PROJECT REQUIREMENTS

- **BR-1:** Environmentally Sensitive Areas (ESA's) will be demarcated, and all work personnel and vehicles will avoid those areas.
- **BR-2:** Environmental training will be provided by a State Parks Environmental Scientist for all work personnel prior to the onset of work activities, including staging and stockpiling.

PROJECT SPECIFIC REQUIREMENTS

- Refer to **AESTH-2**

MITIGATION MEASURES
None required.

Figure 22: Project Site 2 ESA fencing alignment

Figure 23: Project Site 4 ESA fencing alignment

IV. 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 defined as 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 D of the California Environmental Quality Act (CEQA) Guidelines and modified as needed to address potential project impacts.

CULTURAL REGULATORY SETTING

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*."

Historic Resources

Potential historical resources must be evaluated for the California Register of Historic Resources (CRHR) eligibility, or already be listed in or formally determined eligible for listing in the National Register of Historic Properties (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 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.

A resource listed in the CRHR is considered a "historic resource". To be eligible for listing in the CRHR, a resource must have significance, integrity, and generally must be at least 50 years old. A resource can be significant under one or more of the following criteria: 1) associated with events that have made a significant contribution to the broad patterns or California's history and cultural heritage; 2) associated with the lives of persons important in our past; 3) embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual, or possesses high artistic values; or 4) has yielded, or may be likely to yield, information important in prehistory or history. A CRHR-eligible property retains integrity, defined as the authenticity of the resource's physical identity.

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;
- 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 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 (NAHC) 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 (MLD), who has 48 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 other parts of the building site while historical or unique archaeological resource mitigation takes place.

Tribal Cultural Resources

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 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. This will be addressed in Section XVI Tribal Cultural Resources.

To develop a better understanding of the origins and meaning of these resources, both the environmental and cultural contexts (settings) need to be established. The following paragraphs briefly summarize cultural developments through the prehistoric, ethnographic, and historical past.

CULTURAL SETTING

The project area is located along the northern San Luis Obispo County coast at four sites within the San Luis Obispo Coast District: Elephant Hill at the Hearst San Simeon State Historical Monument, The Hearst Castle Guide Complex, the District Headquarters offices adjacent to the Hearst Castle Visitor's Center, and San Simeon State Park Campground.

The geography of San Simeon is composed of a 0.5-1 mile wide coastal plain buffeted by foothills and the rugged peaks of the Santa Lucia Mountains, rising to upwards of 3,400 feet to the east. Many small ephemeral drainages and several major creeks run westward from this range dissecting the marine terraces which end abruptly along sea cliffs 5-50 feet in height. Past human settlements surrounded these drainages and the small coastal lagoons at their mouths. The rocky shorelines and intertidal zones flanking these cliffs host a wide range of marine life including vast kelp forests interspersed by offshore rocks and remnants of sea stacks, where California Native Americans subsisted for thousands of years on sea vegetables, marine shellfish, fish, and pinnipeds. Perennial creeks which penetrate the interior through meandering riparian valleys provided access routes for native populations who moved seasonally from the coast to the interior. The buffering effects of the Pacific Ocean moderate seasonal differences and create a mild Mediterranean climate for the region which enabled habitation along the coast year-round in this manner.

California Native American groups occupied a vast and diverse landscape where many distinct cultures developed leading to one of the most linguistically diverse regions in the world at the time of European settlement in the late eighteenth century. In the absence of agriculture these people lived in hunter-gatherer societies, most of them small populations living within distinct territories in a semi-sedentary network of villages and small encampments with some exceptions such as the Santa Barbara Channel and the Pacific Northwest where larger populations thrived.

Today's California Native American tribes are descended from these past cultures and the languages, oral narratives, customs, religion, and art of their heritage have been retained to varying degrees throughout the state. The effects of colonialism, acculturalization, resilience, and revitalization over the past 250 years have further molded the modern tribal identities composing the tribal groups today. The land and waters of San Luis Obispo County are the traditional homelands of Northern Chumash and Salinan people, who today are represented by those deriving their tribal affiliation as direct descendants of the survivors from Mission San Luis Obispo de Tolosa, Mission San Antonio de Padua, and Mission San Miguel de Arcángel. Northern Chumash and Salinan are collective terms for the groups who spoke dialects of these respective languages and lived throughout San Luis Obispo and southern Monterey counties.

Archaeological Overview

Notwithstanding the cultural heritage carried on within descendant communities, much of what we know about the lifeways of pre-colonial Northern Chumash and Salinan people and their predecessors going back to the earliest known settlements comes from archaeological research.

Archaeological evidence indicates that San Luis Obispo County was occupied as early as 10,000 years ago, as supported by radiocarbon dates obtained from archaeological excavations at Diablo Canyon (Greenwood 1972) and Cross Creek (Jones et al 2002). 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:

Archaic or Paleoindian Period	13,000+/- – 10,300 years before present (BP)
Millingstone Period	10,300 – 5700 BP
Early Period	5700 – 2550 BP
Middle Period	2550 – 950 BP or 1000 current era (CE)
Middle/Late Transition	950 – 700 BP (1000 - 1250 CE)
Late Period Phase 1	700 – 500 BP (1250 - 1450 CE)
Late Period Phase 2/Protohistoric	500 – 180 BP historic contact (1450 - 1769 CE)
Mission Period	1769 CE – 1833 CE (overlap with Mexican Period)
Mexican Period	1821 CE – 1848 CE
American Period	1848 CE – Present

Transitions between these periods are often associated with significant environmental changes or the introduction of new technologies, which led to noticeable change in cultural patterns as identified in the archaeological record. The latter three periods reflect sociopolitical changes which took place in California following the arrival of Europeans. All of these periods aside from the earliest Archaic/Paleoindian Period have been represented by archaeological remains discovered in the San Simeon region.

The northern exposed coast of San Luis Obispo County, extending from the northern edge of Morro Bay to Ragged Point, can be regarded as a relatively discrete environmental and cultural subunit (Jones and Waugh 1993). The San Simeon region is part of the archaeological geographic region known as San Simeon Reef, a term borrowed from biologists to describe the rocky intertidal habitat and extensive offshore kelp beds distinct of the coast between Cambria and Ragged Point (Jones and Ferneau 2002). Extensive archaeological deposits containing evidence of Native American occupations has been found throughout Hearst San Simeon State Park during archaeological investigations over the past 60 years.

Archaic/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 the Cross Creek site excavation at CA-SLO-1797 (Jones et al. 2001) and nearby at CA-SLO-1764 with radiocarbon dates yielding 9,900 BP and 10,500 BP 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 BP and 13,000 BP respectively.

Millingstone Period (10,300 – 5700 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 an abundance of large side-notched projectile points and whole *Olivella* shells 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. Overall, evidence indicates that the Millingstone Culture was a generalized cultural adaptation focused on broad spectrum foraging by seasonally mobile hunter-gatherers. Due to the continued rise in sea level during the early Holocene, many sites associated with this period along the coast have been lost from erosion or inundated prior to the stabilization of sea levels circa 6,000 BP. Nevertheless, some sites containing Millingstone-era deposits have been remarkably preserved by stable land surfaces resistant to erosive forces.

Early Period (5500 – 2600 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 at Little Pico Creek (Jones et al. 1994) where it was a cultural chronology was established placing those deposits into the Little Pico I phase. Other representations of the Early Period have occurred during investigation at CA-SLO-165 at Morro Bay (Jones and Waugh 1995) and again at Diablo Canyon (Greenwood 1972).

Middle Period (2600 – 1000 BP)

The Middle Period on the Central Coast is a well-documented period in terms of archaeological investigations. It is defined locally as the Little Pico Phase II based on the excavations at CA-SLO-215 (Jones and Waugh 1993). 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 1993). However, the Middle Period is marked in the archaeological record by the dominance of the Central Coast Stemmed series projectile points 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 during the Middle Period at a time when populations were increasing, and cultural development was somewhat stable.

Middle/Late Transition Period (1000 – 700 BP)

The Middle/Late Transition Period represents perhaps the most drastic change in cultural development along the Central Coast and Central California in general. This period was marked environmentally by 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. This period is marked by increased violence as shown through archaeological evidence, as well as a more intensive reliance on the marine environment.

Other notable changes during this period is the introduction of the bow-and-arrow to coastal California from interior cultures as has been postulated and supported by an abundance of archaeological evidence throughout the Great Basin and California as a whole. 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 C.E.] or Protohistoric era)

The Late Period begins around 1250 common era (C.E.) and ends at historic contact around 1769 CE. An overlapping period also exists from 1542-1770 known as the protohistoric era, since brief or indirect European contact influenced native California cultures prior to the permanent arrival of the Spanish and other Euro-Americans.

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. Seriation of *Olivella* beads in Central California has been developed to classify certain bead types with temporal cultural Class E and K 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, which appear ubiquitous throughout California during this time indicating a shift to lower ranked prey species and possibly population growth.

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)

The earliest known contact with Europeans occurred in 1542 when Juan Cabrillo sailed along the California Coast and came into contact with groups in the Santa Barbara Channel and further north. Several other voyages were made with limited contact over the following 237 years until the Spanish arrived and built the first mission in 1769. The time period between Cabrillo and 1769 is considered a proto-historic time period when cultural change occurred in California due to indirect influence of European settlement, including disease. It is thought that exotic diseases made their way into California prior to the arrival of the Spanish in 1769 and that many populations had already been decimated or reduced significantly (Preston 1997).

The Portola expedition in 1769 marked the end of the prehistoric or precolonial period of California history, where the archaeological framework is used. It was during the Portola expedition that we learn of Northern Chumash and Salinan villages and individuals who had been thriving for nearly 250 years since Europeans first made contact. Once the establishment of Mission San Antonio de Padua in 1771 and Mission San Luis Obispo de Tolosa in 1772 occurred, Northern Chumash and Salinan people were recruited to the missions through force, persuasion and other means.
Over the following 50 years, all of the traditional villages were emptied, and native people no longer lived on the land traditionally. Many lived at the missions and continued in secret to practice traditional customs.

Ethnohistoric Setting
Much of what we know today about the culture, history and cultural landscape of Northern Chumash and Salinan people comes from original mission records, early twentieth

century ethnographic work, archaeological and other anthropological work conducted over the past 50 years, and cultural revitalization efforts by modern day descendants. These two tribal identities were composed of many smaller groups who shared common languages and customs. The Salinan language has been ascribed to the Southern 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.

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. The boundary has been traditionally identified as the center of Estero Bay with Morro Rock an obvious geographical landmark that may have served as a general territorial boundary between the two different languages, which was first published by Kroeber (1925) and subsequently adopted by later researchers and political entities. Jones and Waugh (1995) state a possible scenario where the boundaries "fluctuated through time in response to possible shifts in economic strategies and population movement". A large study by Johnson and Mikkelson (2005) identified mission records and ethnographic work that supported the idea that a coastal dialect different from Northern Chumash and inland Salinan was spoken north of Morro Bay. It is 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 and did not derive these terms directly from the people themselves.

European contact with this part of California began when Juan Francisco Cabrillo sailed up the coast in 1542 followed by Sebastian Vizcaino in 1602, though neither made landfall in the San Simeon area. 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 documented contact was made with Salinan and Northern 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 documented the San Luis Obispo area and its numerous bears. With the first mission already established in San Diego, the expedition met up with Junipero Serra in Monterey and the second mission was then established at the Presidio in Monterey. On the journey back to San Diego, a third mission was established within Salinan territory in 1771. The following year, in 1772, the fifth California mission was established in San Luis Obispo, where Serra was informed that 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 at the end of the eighteenth century, 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 Northern 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.

Northern Chumash

Northern Chumash refers to the people who spoke the northernmost language of the Chumash language family in and around the San Luis Obispo area. The Chumash occupied a very large portion of California from San Luis Obispo County to Malibu and 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 in place along the Central and Southern California coast with possible origins dating to the initial colonization of this part of the continent. The term Chumash first came into use by Henry W. Henshaw as a naming convention for the family of languages spoken by natives of Santa Barbara, the northern Channel Islands and southern San Luis Obispo, first published in John Wesley Powell's *Indian Linguistic Families of American North of Mexico* in 1891. Chumash as a demographic term used to refer collectively to all of the people speaking dialects of the language family began with Kroeber (1925) and continued onward. Today, seven separate languages are recognized within the Chumashan language family: Ventureño, Barbareño, Ineseño, Purisimeño, and Emigdiano, all stemming from the Central Chumash sub-family; and the other two isolated sub-families of Island Chumash and Northern Chumash. It is the latter language which was spoken in the San Luis Obispo area and is sometimes referred to as Obispeño.

Chumash comes from the word *Michumash*, which natives of the Santa Barbara coastline used to refer to the related groups who lived on Santa Rosa Island. This word was derived from the word *'alchum*, meaning shell bead money, which the islanders were famous for making (Gibson 1980). The Chumashan language family is a linguistic isolate and an ancient language of California originating from the earliest migration of people into the San Luis Obispo and Santa Barbara areas. Early linguists placed Chumash into the southern Hokan language family (Heizer 1956), in which nearby groups such as the Yokut and Salinan languages were also placed, but subsequent research determined it to constitute its own family with ancient origins in California (Johnson and Lorenz 2006:35). Research of Chumash Mitochondrial DNA by Johnson and Lorenz (2006) identified the presence of DNA found among Pacific coast people from North to South America who are associated with the first waves of coastal migration into the Americas, corroborating with linguistic data as to the ancient origins of Chumash people in California.

Northern Chumash spoke the Obispeño dialect of Chumash, a language related to the other Chumash groups of the Santa Barbara Channel and Channel Islands region. Found to be the most divergent of all the Chumash dialects, it has been placed in its own Northern Chumash branch of the Chumash language family. Linguistic studies have determined Northern Chumash began developing in isolation from other Chumash

languages up to 9,000 years ago, early in the Millingstone Period (Johnson and McClendon 2006). Northern Chumash is now considered to be the most divergent language amongst the Chumash-speaking people, suggesting they are a distinct people from their southern counterparts sharing a common ancestry. Northern Chumash was the first California language to have been recorded by European explorers, being first documented by Pedro Fages in 1769 when he recorded some 70 items of the language at the location where Mission San Luis Obispo was later founded. As recorded by the missionaries, the language was spoken throughout San Luis Obispo County including Hearst San Simeon. There are similarities and common words and place names to the Salinan language, spoken to the north and lesser so to the Yokut languages spoken to the east.

Northern Chumash culture was based on a mixed dependency of marine and terrestrial resources and like many cultures in Central California 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, sea vegetables, and fish. The nearshore marine resources were extremely abundant and reliable food sources, such as the Pismo clams found in sandy open coastal habitats and the California mussels found in rocky intertidal habitats. Estuaries found in Morro Bay and Pismo Beach served as focal points for coastal villages where estuarine shellfish species, marine mammals and birds were available alongside the resources of the open coast.

Chumash-speaking people of the Santa Barbara Coast and Northern Channel Islands represented an anomaly in California achieving a much higher social complexity as defined by anthropologists, both in political terms and economically leading to larger populations than any other non-agricultural society in California, paralleled only by the chiefdoms of the Pacific Northwest. This complexity has been found to have developed incrementally from ancient roots starting around 4000 years ago until marked changes around 1200 years ago lead to the highly stratified societies which persisted until arrival of the Spanish (Erlandson and Jones 2002:168). This level of complexity resulted in a pronounced set of cultural traits definitive of Chumash culture and through enforced hierarchical inequality and material production, Chumash culture had a wide influence radiating outward from the Santa Barbara Channel.

Despite influences from Chumash to the south and other neighboring groups, the Northern Chumash people seem to have followed their own cultural trajectories as evident by certain cultural elements present in the Santa Barbara region and absent here, such as projectile point types and the plank canoe, which could have been strictly a result of the inability to navigate the rougher open ocean north of Point Conception, and the absence of islands to reach. Overall, populations were smaller than in the Santa Barbara Channel and Northern Chumash people appear to have followed their own cultural trajectory for many millennia testament to thousands of years of political and cultural sovereignty and relative isolation. Other cultural elements described in mission records and by later Northern Chumash informants to the ethnographer J.P. Harrington describe common traits shared with neighboring groups of Salinan and Yokuts. At the time of

European contact in 1769, a small chiefdom did exist within the Pismo Beach area under the leadership of Chief Buchon who was known to Chumash in the Santa Barbara Channel, Yokuts in the Central Valley, and Salinans to the north. Kroeber described the Northern Chumash people living in a territory that was “thrust into an angle between the Salinans and the sea” (Kroeber 1925).

Chumash traditional ways were interrupted by the Spanish mission system and like the other indigenous Californian tribes, suffered greatly at the expense of colonization. The ensuing Mexican 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. Especially near the coast, assimilation impacted the Chumash way of life to such a degree much of their past was lost with those who died before documenting or passing on to survivors their knowledge, and the Northern Chumash were no exception. Luckily, several individuals were able to pass down much of what they knew in terms of language, culture, history and traditional ways before it was lost forever. Rosario Cooper was thought to have been one of the last full-blooded Northern Chumash and fluent speakers of the language and through her knowledge much was saved. She was able to pass much of what she had remembered to the ethnographer J.P. Harrington who recorded it in his work during the early 20th century. Her and her family’s descendants continue the work revitalizing the language and culture today.

Salinan

The Salinans were a group of Native American people who occupied a large stretch of Central California and who are survived today by hundreds of descendants of partial Salinan ancestry and heritage. The term Salinan was coined by early Spanish referring to the people who lived along the northern the Salinas River which begins in the Coast Ranges of San Luis Obispo and empties into Monterey Bay. The Salinan culture extended over a wide territory all through the coastal ranges surrounding the northern Salinas Valley through its headwaters behind the present-day city of San Luis Obispo and along the main tributaries of the Nacimiento, San Antonio, Arroyo Seco and Estrella rivers and along the coast to the west. A.L. Kroeber in the Handbook for California Indians (1925) described the Salinan tribe as occupying a large territory stretching from the sea to the main crest of the Coast Ranges from headwaters of the Salinas River in the south to near Soledad in the north.

The Salinan language has been placed by most linguists into the southern Hokan language family. This language family is believed to have developed in the California Central Valley early in the Archaic Period with Salinan diverging from the other languages in the family at some point very early on, as evident by its difference from other languages in the family. It is thought this divergence occurred within areas now part of San Luis Obispo and Monterey Counties (Johnson and Mikkelson 2005). Early Europeans, American ethnographers and linguists have broken the Salinan language family into three main dialects: Antoniaño, derived from the Mission San Antonio de Padua spoken in the northern territory; Migueleño, spoken in the southern territory derived from the Mission San Miguel Arcàngel; and the dialect spoken along the coast north of Morro Bay referred as *playano* or *de le playa* (Kroeber 1925; Mason 1930).

Kroeber claims that the language is “wholly unconnected with the neighboring Yokuts and Costanoan (Kroeber 1925:546),” arguing that it has more in common with Esselen, and even more with Northern Chumash. Linguistic research has shown similarities amongst Salinan and Northern Chumash, likely a result of continuous and intimate contact between the two linguistic groups. Marriage ties between Salinan villages and Northern Chumash villages were recorded by the missionaries, and it is likely there was considerable overlap and cultural exchange between the two major groups.

The *playano* language remains mysterious, as the 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 Rancherias 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. It is likely *playano* was a Salinan dialect which may have been hybridized with Northern Chumash (Johnson and Mikkelson 2005).

The problem of cultural association of the *playano* to Salinan or Northern Chumash may be due to the tendency of western scientific and anthropological researchers to categorize indigenous California languages and dialects into discrete cultural identities. The small populations of groups living along this stretch of coast during the time of Spanish contact were largely composed of autonomous villages with their own ties to various Salinan and Northern Chumash groups. Dialects of Obispeño, Migueleño, and Antoniaño were spoken throughout the region and *playano* may have been a hybrid of these. Regardless, the connection between Salinan and Northern Chumash groups goes far back into prehistory and *playano* may represent an important key to the fact that these two groups had been living as neighboring groups for thousands of years and the area from Morro Bay to Ragged Point represented the transition from one language family to another with many shared cultural elements in between.

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

At the time of European contact, Salinan villages were so numerous it prompted the first Spanish missionaries to build their first settlement between the 600 miles stretch from their two forts at San Diego to Monterey along the San Antonio River. Mission San Antonio de Padua was the third Spanish mission in California, established in 1771 along the San Antonio River as a strategic location to colonize the large population of Salinan people living amongst numerous towns located throughout the region. 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 1978).

The mission system eventually took its toll on the Salinan people, and slavery, disease and assimilation decimated the population like many California tribes under the mission system. Traditional lifeways and culture, along with language and knowledge of cultural histories were severely impacted during the struggle. Subsequent settling of the area following California statehood through the late nineteenth century into the twentieth century continued this unfortunate pattern. Despite the hardships, Salinan people today have been able to recover much of their culture, language and history from the missions, archival records, family notes and oral stories. Today descendants of the Salinan people are actively involved in cultural revitalization and have been working with cultural resources management and archaeology for decades. The Salinan tribes are involved in education and cultural revitalization and are carrying on traditional ways to continue their legacy as a culture and people.

Europeans and Native American Contact at Hearst San Simeon

Documentation of early European encounters with natives of San Luis Obispo are the first historic accounts of Northern Chumash and Salinan life. European arrival on the Central California coastline was initiated in 1542 when a voyage led by Juan Francisco Cabrillo sailed from Mexico exploring the Alta California coast resulting in the first documentation of the coastal geography and native people. Weather conditions prevented a landing along the San Luis Obispo coastline, but contact was made with Santa Barbara Channel Chumash. Cabrillo's voyage was documented by one of his diarists Juan Baez, who described much about the villages and life along the Channel (Bolton 1925). Hundreds of natives were encountered, many who met the ships on their plank canoes and tule rafts bringing fish and other gifts, impressing the Spanish with their generosity, ingenuity and boldness. Villages were observed, some with dozens of houses and upwards of 500 inhabitants.

In 1587, a voyage by Pedro de Unamuno represents the first encounter with Europeans and California Indians in San Luis Obispo County, recorded in a detailed letter to the Viceroy of New Spain by Unamuno himself. This account has been challenged by later scholars in reference to the actual location of encounter. Notwithstanding skepticism, the ship is interpreted to have made landfall somewhere along present-day Hearst San Simeon or the Morro Bay sand spit and explored for three days. The party explored around Morro Bay and Los Osos Valley towards San Luis Obispo where they observed several village sites with pit houses and the first recorded sweat lodge in California. An attack by the natives along the shores of Morro Bay resulted in two of the party killed and several natives killed with muskets. The party attempted to stay and was attacked again the following day causing the crew to set sail again (Wagner 1923).

The next voyage was followed by Sebastian Rodriguez Cermeño in 1595. Cermeño documented 300 natives in San Luis Bay who yelled “Christianos” and “Mexico” and the observation of natives on balsa canoes from whence they fish, clearly showing the *tomol* was not used in the calm waters of San Luis Obispo County (Wagner 1924). He also described bow-and-arrows. Sebastián Vizcaino made the next voyage in 1602, which was well documented by his diarist Father Ascension. His party traversed the Santa Barbara Channel, but bad weather made landfall brief and uneventful (Bolton 1925).

Prior to the permanent occupation of California by the Spanish beginning in 1769, the influence of European presence in North American impacted California Native American populations immensely through the arrival of foreign diseases, diffusion of ideas and technology, and stories of colonization throughout the Southwest and Mexico. It is thought that exotic diseases decimated or significantly reduced populations well ahead of the physical arrival of Europeans, which altered the societies during the 237 years following the first European contact with California Indians in 1542 and the start of the Mission Period in 1769. It is now well accepted that viable pathways to microbial spread of disease were present in pre-Mission California and populations were significantly affected (Preston 1996).

Both disease and knowledge of European colonizers made their way throughout California, significantly changing the cultural landscape and social framework of California that Europeans encountered during the Mission Period. Some studies have shown cultural affluence in the larger Chumash interaction sphere to have peaked in the 1500’s and slowly declined over the preceding centuries prior to European arrival in 1769 (Arnold 2004).

The Portola Expeditions

It wasn’t until 1769 when Don Gaspar Portolá led two overland expeditions from San Diego to Monterey in search of suitable sites for missions that Europeans returned to San Luis Obispo. Contact was made with natives in San Luis Obispo and Los Osos Valley in September as recorded in the diaries of Portola himself, his chief diarist Father Juan Crespí, engineer Miguel Constansó, and Lieutenant Pedro Fages. These diaries give us the first real account of the Northern Chumash and Salinan peoples of San Luis Obispo County.

Juan Crespí observed Indians in the vicinity of San Simeon Bay using a “balsa” canoe in May 1770 (Farris 1992). Vancouver recounted observing Indian using wooden canoes in San Simeon Bay in 1793, but it has been concluded they acquired these from contact with Spanish who brought the technology from the Santa Barbara Channel sometime

prior, although it has not been concluded whether they were dugouts or plank canoes (Wagner 1924, Farris 1992). It is through these accounts we learn of Chief Buchon, the powerful chief whose home village was somewhere in the Pismo Beach area. He is described as a “petty king” who commanded tribute from villages throughout the region and instilled fear in neighboring people as far as the Santa Barbara coast. He wore a sea otter skin cape, was surrounded by heavily armed men and held authority over several other smaller status chiefs, indicative of a chiefdom society. The party observed a dispute between Buchon with groups from the San Simeon area as they encountered several warriors headed to battle near Avila Beach, afterwards being retold to them how Buchon was injured but victorious. Buchon was met with on three occasions by the Spanish thereafter and when they returned in 1772, he had died.

Juan Crespi described the party continued north through Cambria and San Simeon noting several villages. At a large village near Cambria called *Osito* the party was gifted a young bear by a large group of natives, who had apparently captured and reared (Squibb 1968). On their return south in December they encountered a party of 60 natives at Villa Creek where they were given ample quantities of fish and pinole (Squibb 1968). On the second overland expedition in May 1770, they encountered natives they had not seen before, evidence of seasonal occupation of certain coastal villages. They also observed one large village near Cambria assumed to be permanently occupied as they encountered the same groups for a third time. At the northern terminus of the expedition in 1770 the Franciscans under order of the Spanish government in Mexico founded Mission San Carlos de Borremeo at Carmel in Monterey in an effort to circumscribe the newly targeted colony of Spanish California. On their return voyage they established Mission San Antonio de Padua in 1771, in the heart of Antoniaño Salinan territory on the San Antonio River.

Missionization and the End to Traditional Life

The establishment of the missions marked the end of traditional life in the San Luis Obispo area as Northern Chumash and Salinan people were brought to the missions and removed from their traditional lands and villages. As previously mentioned, 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 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 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 transmuted 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.

Mission San Antonio de Padua was first established in 1771, the first mission in California to be established after the presidios of San Diego and Monterey were built to support the Spanish galleons and soldiers, which were technically the first two missions. Mission San Antonio was established along the San Antonio River because the Portola expedition observed more natives in the area than anywhere else they had been, aside from the Santa Barbara Channel.

Mission San Luis Obispo de Tolosa was then established the following year in 1772 as the fifth California Mission just after Mission San Gabriel in Los Angeles. Northern Chumash people of San Luis Obispo, Avila, Pismo Beach and the Los Osos and Pecho coasts were the first to be targeted in the Spanish efforts to convert and develop the large Chumash interaction sphere. Salinan people from north of Morro Bay and in the interior were also brought to the San Luis Obispo in the ensuing decade, mostly as far north as Cayucos and Cambria.

Natives from the northern San Simeon coast were first brought to Mission San Antonio in the early years of its establishment, but it wasn't until Mission San Miguel Arcangel was established in 1797 that the area was specifically targeted by the Spanish. Prior to that, it was in a middle zone between Mission San Antonio de Padua, which was too far for the Spanish to access conveniently.

Mission San Luis Obispo de Tolosa was also too far to the south and the path was difficult. After the area was brought into mission lands an outpost was established at San Simeon Creek around 1800, and an adobe was built to serve as an outpost for the soldiers and missionaries to recruit the natives from up and down the coast to bring to Mission San Miguel. The archaeological site of CA-SLO-1373 just outside of San Simeon State Park Campground is the location of the outpost and past archaeological work has confirmed its presence (Gibson 1992).

Life for the Chumash and Salinan people was to change forever following the establishment of the missions. Slavery, genocide and racism accompanied the conversion of the native people to Christianity and mission life. Many were persuaded to move to the missions; those who resisted were killed, while others fled to lands in the interior some joining Yokut-Chumash groups in the eastern Coast Ranges and southern Central Valley. Some hid out in remote hills of Big Sur and joined other Salinan groups living in the mountains or further north with Esselen groups. Ultimately, an outright

removal of all the people from Hearst San Simeon and the nearby areas occurred through the missions and subsequent periods leading to the eventual acculturation of the surviving native people into Euro-American life.

Salinan and Northern Chumash people continued to live in the area throughout the ensuing centuries. Salinan descendants acquired land allotments in the 1800s including part of Rancho San Geronimo north of Cayucos and Rancho Piedra Blanca, now part of Hearst San Simeon Ranch. The latter was granted to Jose de Jesus Pico who married a Salinan woman, Francisca Villavicencio, the granddaughter of Rafael de Jesus Villavicencio who was the third Spaniard to marry a Salinan maiden at Mission San Antonio in 1773. Some worked for William Randolph Hearst during the construction of Hearst Castle, including the transplanting of entire oak trees to the hilltop (Hurt, personal communication 2023). Today Salinan and Northern Chumash descendants still live in the area and are actively involved in cultural heritage.

HISTORIC-ERA OVERVIEW

In 1821, following the Mexican war of independence, the new Mexican government granted numerous land grants to individuals in Alta California to encourage settlement in this sparsely populated region of Mexico. These land grants were primarily made up of desirable, coastal lands that were formerly operated as Spanish missions, and were gifted by the governors of Alta California to wealthy or politically connected families. These land grants were often thousands, or tens of thousands of acres in size, and used for cattle ranching to supply the hide and tallow trades. The San Simeon area was divided into the 4,469-acre Rancho San Simeon, granted to José Ramón Estrada, and the 48,806-acre Rancho Piedra Blanca, granted to Jose de Jesus Pico. Pico was the former administrator at Mission San Antonio and Mission San Miguel and as mentioned above married a Salinan woman Francesca Villavicencio.

Following the Mexican-American war from 1846-1848 and California's admittance as a state in 1850, the California government began reducing the size of many Mexican-era land grants. Following the passage of the California Land Act of 1851, Mexican land grant owners or "Rancheros" were required to prove legal ownership of their property under California law, a costly process that required the services of land surveyors and years of legal battles in court. To pay for legal fees, many owners subdivided their land and sold off parts of it. Even those who didn't sell their property often had a difficult time proving the exact boundaries of their large properties, and thus those land grants were often reduced in size, and the leftover land became public land. Public lands were made available for purchase or were used for "squatting," or unofficial occupancy, often by American or European settlers who claimed the public lands and built houses and businesses on them.

In 1864, Joseph Clark, who had changed his name from José Machado, arrived in San Simeon and started a whaling business on San Simeon Point. Clark was an immigrant

from the Azores, a series of islands in the Atlantic Ocean governed by Portugal. Clark built a small wharf near San Simeon point to help his whaling boats clear the surf. Many local reports discuss whaling occurring informally in San Simeon since the 1850s, but it was Clark who established a large-scale, successful whaling operation at the location in the 1860s. He built a ramp that led from the wharf to the blubber and oil processing area and constructed a house and a bunkhouse for his crew inland.

The whaling industry at San Simeon was dominated by Portuguese immigrants from the Azores. Azorean immigrants first joined the U.S. whaling industry in the early 1800s, when whaling ships departing from the East Coast on deep sea whaling voyages made regular stops at the Azore Islands, where they restocked with fresh water, fruit and vegetables. Portuguese immigrants first became involved in the American whaling industry during this period, when Portuguese whalers joined the American ships' crews during their restocking stops. Increasing population pressures and lack of available land on the islands led young men from the Azores to seek out new opportunity on American whaling ships. Many of these Portuguese immigrants congregated in New Bedford, Massachusetts, the hub of the whaling industry on the East Coast.

Like many groups from around the world, these Portuguese immigrants were then enticed to travel west to California by the news of the gold rush in 1848. Soon after arriving, these hopeful gold miners realized that gold mining was not profitable for most speculators, and they started seeking alternative ways to sustain themselves. They were already familiar with the whaling industry, and soon Portuguese immigrants (particularly from the Azores) were the most numerous ethnic group involved in California shore whaling.

While Portuguese immigrants dominated the whaling industry across California, in San Simeon local Chinese fishermen occasionally assisted the San Simeon whaling crew with capturing and bringing in whales. The Chinese fishermen who aided these crews would often be given the whale sinew as payment. Sinew is a fibrous tissue that could be made into a strong string or fishing line, and would be shipped to San Francisco and then out to China for sale. Records from San Simeon indicate that $3,000 worth of "Chinese products" were shipped from San Simeon in 1869, which may have referred to seaweed (often harvested from the coastal bluffs by Chinese farmers) or to this sinew product (Angel, 105).

In 1865, George Hearst began acquiring land in the San Simeon area. A precious minerals miner and land speculator, Hearst had gained considerable wealth due to profitable land investments during the California Gold Rush. He purchased approximately 30,000 acres of Rancho Piedra Blanca as part of an initial land acquisition in the area. In 1869, Clark partnered with George Hearst to develop the burgeoning whaling industry at San Simeon Point.

In 1869, Clark and Hearst constructed a commercial pier at San Simeon point. This wharf served to advance Clark's whale processing operation, but it was located in rough surf and thus posed challenges to passing ships. Hearst built another pier in the bay of San Simeon in 1878, which Captain Clark used for shipping whale oil, though he continued to run his whaling station out of its original location on San Simeon Point.

George Hearst's commercial pier in San Simeon Bay served the community of San Simeon as a point from which whaling products, agricultural products, construction materials, and other goods could be shipped in and out of the area. This pier was utilized for shipping and fishing until 1947, when it was deemed obsolete and was demolished (Olmsted Center 2009).

At the peak of the whaling period, San Simeon point was home to about 25 families and numerous businesses including the general store, a blacksmith shop, a barbershop, and a saloon. The general store served the whalers and their families as well as the people who lived and worked on the surrounding ranches. Originally constructed in 1871 at San Simeon Point, in 1878 the store was moved to a new location near San Simeon Bay and combined with an existing building there to make a larger store. In 1914, the store was purchased by a man named Manuel Sebastian. Sebastian's Store still exists at the same location and was recommended eligible for listing on the CRHR in 2020.

In addition to the individuals who directly participated in the whaling industry, San Simeon also supported a burgeoning dairy farming industry in the late 1800s, supported by homesteaders and new arrivals from the East Coast and across Europe, especially Swiss-Italian and Portuguese populations. The Swiss-Italian immigrants who eventually made their way to the Central Coast came primarily from the Canton of Ticino, an Italian-speaking region along the southern border of modern Switzerland. This region was known for its cheese and wine production, which thrived in the region's unique Mediterranean climate.
In the mid-nineteenth century, overpopulation, paired with the news of the California Gold Rush, led Swiss-Italian immigrants to travel to California to pursue wealth, either through the gold fields or through dairy farming to support the increasing population of gold miners. As experienced dairy farmers in Ticino, these new arrivals noticed the similarities in climate and topography of coastal California, and soon initiated dairy farming operations there. Over the following decades, additional immigrants arrived in California following positive reports from family or friends. Many of them initially came to the Bay Area where the dairy industry was thriving by the mid-nineteenth century. Then, in the 1860s and 70s, they began moving south to the Central Coast to start new dairy farms on the previous rancho lands. These population shifts are recorded in U.S. Census records: In 1870, 109 Swiss-Italian were living in the coastal ranges south of San Francisco, and by the 1930 census there are over 6,000.

During the mid-to-late 1800s, San Luis Obispo County remained relatively isolated from the rest of California. Railroads did not yet connect the Central Coast to the rest of the state, and roads were rudimentary, leading to a reliance on shipping through piers or "doghole ports" (deep water coves that allowed small ships to anchor and send supplies

ashore in rural coastal areas). Long transportation times meant that milk could not be transported fast enough to larger markets in San Francisco before it spoiled. As a necessity, milk was turned into butter or cheese before shipment to slow the perishing process. Due to these transportation limitations, the rural communities of San Luis Obispo County became a major producer of butter and cheese, and even a leading producer for the state by the 1890s.

Historical records and archaeological surveys indicate the presence of farmed properties within present-day San Simeon State Park during the mid-1800s. This includes the farm of John Whitaker, who purchased property in today's San Simeon State Park in 1861 and started a dairy farm and orchard. John Whitaker's great-granddaughter Mary Hulda Washburn sold the family property to California State Parks in 1966, and today this area is still known as Whitaker flats and the Washburn Campground.

At San Simeon cove, the whaling industry slowed in the second half of the 19th century due to the declining whale population, and the whaling station at San Simeon closed shortly after Captain Joseph Clark's death in 1891. George Hearst also died in 1891, leaving his fortune to his wife, Phoebe Hearst. Their only child, William Randolph Hearst, inherited the San Simeon ranch property in 1919, after Phoebe Hearst's death. Over the following 32 years, Hearst and his architect, Julia Morgan, constructed a vast hilltop estate on the property, called "la Cuesta Encantada" and today referred to as "Hearst Castle." The estate includes three smaller residences, one main residence known as "Casa Grande," and over 100 acres of formal gardens, orchards, and walking paths.

In 1947, Hearst suffered a medical emergency and was forced to leave the hilltop estate, and in 1951 he died. The property was donated to the State of California by the Hearst Corporation in December 1957 and was opened to the public for tours in 1958.

PROJECT SPECIFIC STUDIES

Cultural Resources Survey

Desktop research, record search at the Native American Heritage Commission, a cultural resources field survey, and review of past CDPR projects was conducted to identify cultural resources within the project area. This included a review of all previously recorded archaeological sites, and all previously conducted cultural resources studies within ¼-mile of the project area stored within the CDPR cultural resources database which includes all the data housed within the California Historic Resources Information System (CHRIS) at the Central Coast Information Center (CCIC) at the University of California Santa Barbara.

Previously Recorded Archaeological Sites and Studies

Site 1 and 3

No previously recorded prehistoric archaeological sites are within Hearst Castle grounds nor within ¼-mile of Site 1 or 3. No prehistoric archaeological resources have been

identified by past survey work on CDPR property within ¼-mile of the project. Archaeological surveys of the project areas at Site 1 and 3 did not observe any evidence of prehistoric archaeological resources. Historic archaeological deposits associated with the construction of Hearst Castle and subsequent activities during Hearst's time are located in the vicinity of Site 1 and 3. No significant historic archaeological deposits or sites have been identified or evaluated at Hearst Castle. Most of the historic features present on Hearst Castle grounds have been restored or maintained or otherwise demolished either prior to or after the acquisition by CDPR. Some historic features have been documented during past surveys by CDPR staff and include concrete drainage features and the historic wall along Hearst Castle Road along the pergola and other historic masonry work and concrete work that has not been restored. Subsurface historic archaeological deposits have been uncovered during past maintenance activities by CDPR staff but no archaeological evaluations have taken place. During the preceding construction for this project for grading of the pads and installation of utilities at Site 1 in 2022, archaeological monitoring documented historic rubble and materials from the animal enclosures associated with the elephant hill location and area described in more detail below.

Site 2

A total of five sites are found within ¼-mile of the project area at Site 2: CA-SLO-186, CA-SLO-187, CA-SLO-378, CA-SLO-383, and CA-SLO-1373. CA-SLO-186 is over 500 meters from the site and will not be affected by the project. CA-SLO-378 and SLO-1373 are located off CDPR property and will not be affected by the project. CA-SLO-187 is closest to the project area at Site 2 but past and recent archaeological surveys did not find evidence of archaeological deposits associated with the site within the project area. In addition, a substantial amount of past disturbance has occurred at Site 2 from construction of Van Gordeon Creek Road, historic agricultural activities and construction of the San Simeon Campground, roads and past grading at the site. CA-SLO-383 is located adjacent to Site 2 and is approximately 100 meters away and extends mostly west across Highway 1.

CA-SLO-187

CA-SLO-187 is a prehistoric archaeological site located in and adjacent to San Simeon Campground. The site was first recorded in 1967 and portions of the site have been subsequently re-recorded and subject to sub surface investigation. Test excavations by Gibson in 1978 for the development of the campground revealed the site to be a rich cultural deposit associated with prehistoric village components dating to at least 1,200 BP and onward. An abundance of artifact types were recovered including rock features, projectile points, bowl mortars, hundreds of shell beads, and a plethora of marine shellfish and faunal remains (Gibson 1979). The site was re-evaluated in the early 1980s during further campground development by DPR archaeologist Phillip Hines (Hines 1986) concluding the site to date from at least 2,000 BP and through Spanish contact and the Mission Era of the late 18th-century. This work concluded the site to contain deposits to at least 130 centimeters below the surface and also concluded there were buried deposits

from flooding events of San Simeon Creek where sterile alluvial deposits had buried cultural layers. A portion of the site on State Parks property was again tested for campground rehabilitation work in 2001 documenting areas of previous disturbance and partially intact deposits (Jones and Laurie 2001).

CA-SLO-383

CA-SLO-383 is a large prehistoric archaeological site first recorded in the 1960s as two sites and then re-recorded in 1977 by CDPR archaeologists Kelley and Young. The site was recorded to be potentially important to the understanding of the network of ethnohistoric villages recorded by Spanish missionaries . The site was assigned as a California State Cultural Preserve in 1990 giving it an elevated status of management due to its high sensitivity as an important archaeological and cultural resource. Labeled the Pa-Nu Cultural Preserve, the site contains mostly undisturbed intact deposits to the west and east of where it is bisected by SR-1. The current project will not affect this site.

Site 4

A total of five sites are located within ¼-mile of Site 4: CA-SLO-145, CA-SLO-361, CA-SLO-721, CA-SLO-722, and CA-SLO-723. CA-SLO-361 is located on the west side of Highway 1 and will not be affected by the project. The other sites are located outside of CDPR property and will not be affected by the project.

Prior to the construction of the Hearst Castle Visitor's Center a cultural resources survey was conducted and determined no archaeological sites existed within CDPR land holdings and existed only in the surrounding area, where they are reasonably protected and where public access is barred (Nesbitt n.d.).

Cultural Resources survey and an archaeological testing occurred within the Site 4 project area in 1984 during the initial construction of the modulars, parking lot and facilities for the Hearst Castle Visitor's Center: Subsurface Archaeological Exploration at Hearst San Simeon State Historical Monument, San Luis Obispo County, California. The investigation conducted intensive pedestrian surveys and excavated 40 augur boring throughout the spatial extent of Site 4 and beyond to the south. The project concluded "no evidence of an archaeological nature was found in any of the auger borings or during the surface examination". Only three isolated flaked stone artifacts were observed during the study, two of them on the surface near Site 4. Furthermore, no archaeological deposits or artifacts were observed during construction.

Additional studies were conducted on Hearst Ranch property for PG&E work in the 2000s resulting in the identification of several archaeological sites located along the banks of Arroyo del Puerto creek along and in between the north and south forks of the drainage.

A description of the nearby archaeological sites is found below:

CA-SLO-145/H

CA-SLO-145 was originally recorded as an occupation site with dark soil, obsidian, chert, pestles, and mortars and contains a historic ranch and residence from the late 19th and early 20th centuries. It was noted that two PG&E poles were placed directly within the site and artifacts and a portion of the deposit had been impacted by vehicles and construction. The historic component of the site consists of a historic deposit associated with the historic-era ranch house located immediately adjacent to the site to the north.

CA-SLO-361

CA-SLO-361 is located on the west side of Highway 1. The site consists of a wide lithic scatter and pockets of midden. The site was subject to two investigations by CDPR archaeologists (Parker 1994; Sawyer 1986). The studies found archaeological deposits up to 70 centimeters below the surface but did not identify any significant features. The site was not evaluated for NRHP or CRHR eligibility, but it was noted that substantial previous disturbance had occurred from historic activities in the 19th and 20th centuries and subsequent road work.

CA-SLO-721

CA-SLO-721 is a lithic scatter with a sparse shell midden. The site was originally recorded by Anne Peak in 1975 and is likely contiguous with CA-SLO-723. The site is off CDPR property.

CA-SLO-722

CA-SLO-722 is located on a stream terrace and was originally recorded as a shell midden deposit with concentrations of lithic materials (Peak 1975c). Work conducted in 2008 observed extensive surface artifacts including flake tools and ground stone implements. The site is off CDPR property.

CA-SLO-723

Site CA-SLO-723 is located on a narrow stream terrace, downstream from CA-SLO-722 and is likely contiguous with CA-SLO-721. Peak originally recorded this site in 1975 as a shell midden with chert flakes and groundstone tool fragments, including a cobble pestle. Archaeologists did not observe any previous construction related disturbances in this location during 2008 PG&E surveys. This site is also off of CDPR property.

Table 10: Table showing previously recorded archaeological sites within ¼-mile of the project.

Site Trinomial	Site Type	Setting	NRHP Eligibility

CA-SLO-145H	Historic-era homestead and historic archaeological deposits	Stream terrace	Not evaluated
CA-SLO-186	Lithic scatter, midden, rock features and BRM .	Stream terrace	Not evaluated
CA-SLO-187	Lithic scatter, midden, rock features and buried deposits Abundant flaked stone tools and features observed during archaeological investigations.	Stream terrace extending within and off DPR property	Recommended eligible no SHPO concurrence (Gibson 1988)
CA-SLO-361	Lithic scatter and pockets of midden containing abundant flaked stone debitage.	Marine terrace	Not Evaluated
CA-SLO-378	Midden and surrounding lithic scatter with debitage, cores and tools	Stream terrace	Not Evaluated
CA-SLO-383	Location of Pa-Nu Cultural Preserve . Dense lithic scatter and portions of midden.	Marine terrace	Not evaluated .
CA-SLO-721	Sparse lithic scatter	Stream terrace	Not evaluate
CA-SLO-722	Flaked stone tool and debitage scatter	Stream terrace	Not evaluated
CA-SLO-723	Lithic scatter, two loci and small midden deposit	Stream terrace	Not evaluated
CA-SLO-1373	Dense shell midden with lithics, tools, and possibly protohistoric artifacts. Highly sensitive located off CDPR property	Stream terrace	Not Evaluated

Historical Resources within the Project Area

San Simeon State Historical Monument has been formally evaluated for the CRHR and NRHP and was placed on the National Register of Historic Places on June 22, 1972, and became a National Historic Landmark on May 11, 1976. Indicated areas of significance included architecture, as well as communications, military, politics/government, and theater, due to Hearst's multifaceted pursuits. The period of significance extends from 1919, when Hearst inherited the estate and when he commissioned construction on the property, to 1947, when he left the property for the final time due to health concerns. The designated historic area of Hearst Castle covers 127.06 acres and includes the primary residence known as Casa Grande, three smaller residences (Casa del Monte, Casa del Sol, and Casa del Mar), an outdoor and an indoor pool, several support buildings, and numerous terraces and gardens.

Site 1 and site 3 are located within the boundaries of the National Historic Monument and are visible to public tours. Thus, potential visual impact on the cultural landscape was considered during the design of this project, and measures were taken to minimize any potential impact. At Site 1, the project area is currently screened from public view by existing oleanders and the long garage building. Key viewing areas include tour stops from Hearst Castle and the ranch road at Hearst Ranch. To minimize the visibility of the

modular buildings from the perspective of the Hearst Ranch, appropriate plants (toyon and oak trees) will be planted by Hearst Castle gardening staff to provide adequate screening. A minimum of 24 oak trees and additional toyon trees will be planted between the modular buildings and the Hearst Ranch. In addition, the modulars will be painted a tan/earth color on both their siding and roof, ensuring that the buildings blend into the surrounding environment as much as possible from all potential viewsheds (see Appendix A for visual assessments).

At Site 3, the project has also been designed to minimize visual impacts to the cultural landscape. Toyon trees will be planted in between the modular buildings and access road to obscure the view of the guide complex from visitors driving into the entrance gate. Two Toyons will be planted in the ground and one will be planted in a pot due to limited space. This species was planted by Hearst during his residency at Hearst Castle, and matches the surrounding cultural landscape. This vegetation screening will largely obstruct the view of the modular buildings from the public. In addition to vegetation screening, the new modular buildings will have a brown/earth-colored roofing material, thus ensuring the buildings blend into the surrounding vegetation and do not distract from the historic features of Hearst Castle for the visiting public. While these buildings are non-historic, construction will occur adjacent to historic features, notably adjacent to a concrete retaining wall dividing the guide modular units and the Hearst Castle access road, which appears to date to the period of Hearst's residency. This wall will be protected in place during construction.

A Deodar Cedar tree located at Site 1 is considered part of the cultural landscape due to its presence during Hearst's residency and its incorporation into the zoo facility. State Parks staff completed coring on the tree to determine its age, which was estimated at 80+ years, confirming its presence during Hearst's residency. In addition, historical photos indicate its presence within the octagonal zoo structure. The project at site 1 has been designed to protect in place an existing Deodar Cedar that dates to Hearst's residency. The buildings were designed to be placed around the Deodar Cedar, avoiding impact to its root structure.

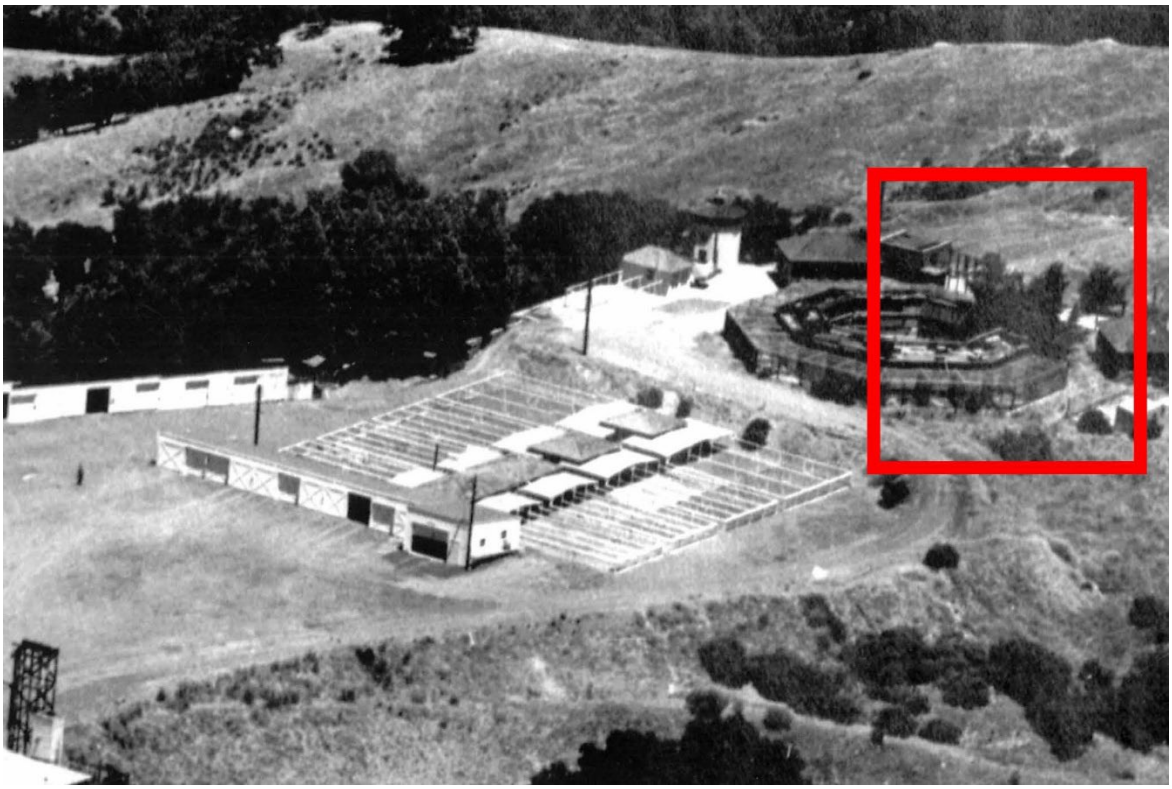

Figure 24: Zoo enclosure circa 1948. Note the Deodar Cedar highlighted. Hearst Castle Photo Archives

Figure 25: Photograph of Hearst's guests standing in front of the octagonal zoo enclosure, with the Deodar Cedar behind. Hearst Castle Photo Archives.

Figure 26: Additional photograph of the zoo enclosure, showing the Deodar Cedar. Hearst Castle Photo Archives.

Figure 27: Core sample taken by California State Parks Staff members Jeff Ebner and John Sayers on 9/29/21, indicating the tree's age is 80+ years.

Additional historical resources include the remnants of the octagonal zoo structure located at site 1. These zoo building remnants have lost their integrity due to previous disturbance and demolition, and their remaining components were document by State Parks cultural resources staff during trenching that occurred at the site in August 2022 (See appendix C.2 for monitoring reports). Any further features that might be uncovered during the course of this project will also be documented by cultural resource staff.

Cultural Resources Field Survey

Cultural Resources field surveys were conducted for the project which included pedestrian transects of the project area to inspect for evidence of past human activities, both historic and prehistoric. Native American prehistoric archaeological deposits common to this part of California include marine shellfish midden deposits which contain marine shellfish remains, charcoal and dark soils with high organic matter. Evidence of prehistoric tool making includes lithic debitage from flaked stone typically composed of Franciscan or Monterey chert and less frequently obsidian; and ground stone implements fashioned from local sandstone or volcanic rocks. Artifacts include projectile points and otther flake stone tools, groundstone tools such as manos, pestles and mortars, and ornamental objects including shell and stone beads, abalone pendants, and incised stone. Ecofacts are organic remains preserved in the archaeological record discarded from subsistence activities such as marine shellfish remains and faunal bone. Historic features typical of the area include Hearst-era architecture and landscaping features such as concrete and natural stone masonry; and earlier ranching and homestead historic features such as privies, livestock features, and/or historic trash deposits.

The field surveys at all four project sites did not observe any evidence of prehistoric archaeological deposits within proposed project areas. Sites 1 and 2 were surveyed in August 2022 and Sites 3 and 4 were surveyed on March 8, 2023, and previously in 2021 and 2022 for other CDPR projects at the same locations. Sites 1 and 2 were subject to archaeological monitoring during the installation of utilities and site preparation for the project which already occurred.

Surveys for Sites 1 and 3 confirmed the project will not occur within any architectural elements of Hearst Castle nor within contributing portions of the cultural landscape of Hearst Castle. Potential for historic archaeological resources associated with the zoo structure at Elephant Hill and other unknown buried historic artifacts associated with Hearst Castle were determined to be minimal due to the past demolition of structures at Elephant Hill and its later use as a maintenance area and storage.

Past Archaeological Monitoring at Site 1 and Site 2

Archaeological and tribal monitoring for ground disturbing activities occurred for the project activities that have already occurred at Site 1 and 2 for site preparation, installation of utilities and grading. Archaeological monitoring reports were completed and found in the Appendices (see Appendix C.2.).

Previous work at Site 1 was conducted under a Notice of Exemption and as noted above, historic and archaeological monitoring took place during grading and preparation of the pads and installation of electrical utilities. Trenching unearthed historic-era trash and remnants from the zoo buildings, which were dismantled and seemingly piled together and buried after State Parks took ownership of the property in 1958. These zoo building remnants have lost their integrity due to demolition and subsequent burial within fill material on the southeastern corner of Site 1. The fragments of the concrete enclosure and other unearthed components were documented during monitoring by cultural resources staff in August 2022 (see Appendix C.2). Any further features that might be

uncovered during the course of this project will also be documented by cultural resource staff.

Figure 28: An example of the zoo building remnants uncovered during trenching on Aug. 23, 2022.

Previous work that occurred at Site 2 under the NOE from September 2022 through January 2023 was accompanied by archaeological and Native American tribal monitoring during grading and excavations, which resulted in no adverse effects to historic, archaeological, or tribal cultural resources. nor the observance of any intact or previously disturbed archaeological deposits associated with CA-SLO-187 or CA-SLO-383. Only isolated historic-era trash and several isolated prehistoric artifacts and ecofacts were observed. No adverse effects occurred to historic or archaeological resources due to ground disturbing activities for the project and no mitigation was necessary. No inadvertent discoveries occurred, although several isolated historic-era and prehistoric-era artifacts were recovered from previously disturbed contexts. This included isolated historic-era and prehistoric artifacts found within previously disturbed soils in the upper two feet of trenches. One partial bowl mortar was recovered at 14” below the paved surface within roadbase and fill material on December 28, 2022, during archaeological and tribal monitoring and was placed back in the ground on site.

Figure 29: Trenching for utilities on 10/18/22 during the preceding project for the San Simeon Campground Modular at Site 2. Photo by Chad Jackson.

Figure 30: Excavations for electrical utilities at Site 2 showing previously disturbed soils where a fragment of a prehistoric bowl mortar was uncovered in sterile excavated soils. Photo taken 12/28/22 by Chad Jackson.

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) No historic resources, as defined by PRC § 15064.5 are located directly within the project area of impacts and therefore no adverse change to any historic resources is expected to occur from the project. No contributing elements to the historic resources of Hearst Castle or the Hearst Castle Cultural Landscape are directly within the project area. At Site 1, the Deodar cedar tree will be avoided and protected in place and any remnants of the zoo enclosures have lost integrity due to previous demolition. All excavations at Site 1 will be monitored by the CDPR historian and/or archaeologist to ensure no unknown significant features that may contribute to the historic resources of Hearst Castle or the cultural landscape are adversely affected.

b) The potential visual impacts to the cultural landscape of Hearst Castle are expected to be Less than Significant at both Site 1 and 3 through the implementation of vegetation screening and the earth-tone color of the new modular buildings designed to reduce potential visual impacts to de minimis levels. Due to the proximity of CA-SLO-187 to Site 2 and past recommendations for inclusion in the National Register of Historic Places, archaeological and Native American tribal monitoring will occur for all ground disturbing activities at Site 2 to ensure no unknown resources associated with the site are unearthed or impacted. Ground disturbance within intact native soils at Site 2 will not occur for this phase of the project. Previous excavations at the site were monitored by the District Archaeologist and a tribal monitor and no adverse effects occurred to CA-SLO-187 nor were any intact archaeological resources observed.

c) No unique archaeological resources are known to exist within the project area. Archaeological and tribal monitoring will occur for all ground disturbing activities at Site 2 due to the proximity of archaeological resources to the project area. Previous ground disturbance for the project at Site 1 and 2 were accompanied by archaeological, historic and tribal monitoring and did not observe any such resources during ground disturbing activities. Previous archaeological studies for site 4 did not identify any unique archaeological resources and site 3 is not within an area known to contain prehistoric or Hearst-era archaeological deposits. Ground disturbance for the project will be monitored and inadvertent discovery clauses will be in effect in the low likelihood previously unknown resources are unearthed. Thus, the project is expected to result in a Less than Significant Impact on archaeological resources.

d) No human remains have been previously identified at site 1-4 during past ground disturbing activities. No known Native American burials or cemeteries are known to exist within the project area or adjacent to any of the project sites. Measures will be in place in the unlikely event that human remains are discovered during the project to prevent their disturbance, however the project is not expected to disturb any human remains whatsoever. Less than significant Impact.

STANDARD PROJECT REQUIREMENTS

CULT-1 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 CDPR staff 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. The staff will be instructed to halt work in the event that any such cultural resources are unearthed

CULT-2 If any previously undocumented cultural resources are encountered within the project (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, Historian or a DPR-qualified Cultural Resource Specialist has evaluated the find and implemented appropriate treatment and regulatory compliance.

CULT-3 In the event human remains are discovered work will cease in the immediate area of the find until further notice and the onsite CDPR 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. The County Coroner's office will make the determination whether any human remains are of prehistoric Native American origin or subject to further law enforcement investigation.

If the coroner determines the remains are of Native American origin they will contact the NAHC within 24 hours. The NAHC will appoint a Most Likely Descendant (MLD). The

MLD will have 48 hours from the time of the appointment to visit the site and determine the appropriate treatment and disposition of the human remains and anything subject to the AB 275. Work is not to resume in the area of the find until proper disposition is complete (PRC §5097.98). If a Native American monitor is on-site at the time of the discovery, onsite CDPR staff will work with them to ensure any human remains and/or funerary objects are left in place or returned to the point of discovery and covered with soil until further notice.

PROJECT SPECIFIC REQUIREMENTS

CULT-4 All excavations at Site 1 and 2 will require archaeological monitoring by a Cultural Resources Specialist. Tribal monitoring will accompany any excavations within previously undisturbed soils at Site 2. The contractor shall facilitate observation of excavations and subsurface sediments by monitors and allow for evaluation of any discoveries. Any remnants of historic structures at Site 1 shall be photo documented by the Cultural Resources Specialist.

CULT-5 The historic Deodar Tree located on Elephant Hill will be protected in place throughout the project as noted in AESTH-5. This includes placing protective fencing around dripline of the tree and avoiding disturbance to the root structure during construction.

CULT-6 The retaining wall surrounding the guide complex modular buildings at Site 3 will be protected in place.

CULT-7 If any historic resources, either within the project area or in the surrounding cultural landscape of Hearst Castle, are damaged as part of the project, the State Representative should be contacted immediately. A repair or replacement plan will be created that will be deemed acceptable by the State Representative at the expense of the contractor. Repair and replacement of historic objects or features must be completed by a qualified restoration specialist.

MITIGATION MEASURES

None required.

V. 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 120kV circuit is located along the Site's frontage on Dyerville Loop Road. Service to all the improvements will be underground once on the site.

State Title 20 and Title 24, California Code of Regulations New buildings constructed in California must comply with the standards contained in Title 20, Public Utilities and Energy, and Title 24, Building Standards Code, of the California Code of Regulations. These efficiency standards apply to new construction of both residential and nonresidential buildings, and they regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in Title 24 guidelines.

California Green Building Standards Code (CALGreen)

On August 1, 2009, the California Building Standards Commission's California Green Building Standards Code went into effect. This code is the country's first statewide green building standards code. A voluntary standard initially, aspects of CALGreen became mandatory in the 2010 code. The 2010 version of CALGreen took effect January 1, 2011, and instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and nonresidential buildings. Updates were added to CALGreen on July 1, 2012, and involve clarification of the difference between mandatory and voluntary provisions regarding nonresidential additions and alterations. Additional updates associated with regulations of nonresidential buildings went into effect on January 1, 2014.

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?	☐	☐	☐	☒

DISCUSSION

a) Construction of the project would occur intermittently in phases over approximately thirty months. Construction activities would consume energy through the operation of heavy equipment, trucks, and worker traffic. 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, the Project will benefit from several green building standards and alternative energy systems that are already installed at the various project sites. These include a 100kw photo voltaic solar array at the bottom of the hill, serving the District Office complex and the Visitor Center. The hilltop modulars will include at least six new EV charging stations. In addition, the District already maintains a fleet of EV's that continues to grow. This will continue to reduce the consumption of gasoline at the District in favor of cleaner electricity. As the modulars are constructed offsite on an assembly line, energy used during construction will be more efficient than constructing on-site. Compliance with current Title 24 requirements will result in much more energy efficient units.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

AVOIDANCE AND MINIMIZATION MEASURES

None required.

VI. GEOLOGY AND SOILS

REGULATORY SETTING

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."

No state or local agencies have specific jurisdiction over paleontological resources. No state or local agency requires a paleontological collecting permit to allow for the recovery of fossil remains discovered as a result of construction related earth moving on state or private land in a project site. Project impacts to these resources do not constitute an adverse effect on the environment unless they have been identified prior to a project.

CDPR adheres to CEQA requirements for paleontological resources and for projects subject to CEQA level environmental review where CDPR acts as the lead agency the following applies. DPR Operations Manual, Natural Resources Division, Paleontological Resources 0309.1, Site Development Policy states:

> "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."

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 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. Underlying the fault between San Simeon and Piedras Blancas are faulted blocks of Franciscan, serpentinites, Tertiary sedimentary breccia, and volcanic rocks. During the Pleistocene, right-lateral strike slip movements along San Simeon were up to 1500 feet (Lawson 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 melanges 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 melange formation, the landslide itself would then be re-subducted, sheared, or deformed to give the texture seen today.

Faulting and Seismicity

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.

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. The proposed project would not cross any active faults or potentially active faults considered to be A-P fault zones. The project area is within a seismically active region with several prominent active earthquake faults, however. 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.

Soils

Soils within the project area vary by site according to the Natural Resources Conservation Service and were sourced via the Web Soil Survey. Sites 1 and 3 are within rocky soils of the Xererts-Xerolls-Urban land complex and occur in weathered bedrock of sandstone, mudstone and shale. They are non-agricultural soils, well-drained, not hydric, and have no frequency of flooding. Site 2 is within the Salinas silty clay loam series derived from sedimentary alluvium. These soils are well drained, have no frequency of flooding, and qualify as 3c agricultural land when not irrigated. Site 4 soils are within the Concepcion Loam Series and derive from sedimentary alluvium. These soils are moderately well drained, have no frequency of flooding, and are considered 3e agricultural soils irrigated or non-irrigated. Based on these soils, all four project areas are stable and resistant to liquefaction.

To ensure compliance with applicable regulatory requirements a Stormwater Soil Loss Prevention Plan (SWSLPP) was in place for all activities that already occurred for Sites 1 and 2 per the NOE and a Stormwater Pollution Prevention Plan (SWPPP) will be in place for the project.

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 and 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.

UCMP UC Museum of Paleontology Localities

Number of matches: 3

- Download your results (tab-delimited text file with .xls file extension, 3 lines, file size = 0.5 K)
- Map localities with a US county

Query: SELECT FROM ucmp_loc2 WHERE cont_ocean = "North America" and country_std = "United States" and state_prov_std = "California" and county_std = "San Luis Obispo County" and formation like "%franciscan%" ORDER BY loc_prefix,cast(loc_num as unsigned integer),loc_suffix

Click on the Loc ID to see the full locality record

Loc ID	Coll	Locality Name	County	State / Province	Country	Cont	Period	Epoch	Formation	Member	Storage Age	Flora/Fauna
D107	I	San Luis Obispo	San Luis Obispo County	California	United States	North America	Jurassic		Franciscan?			
PA182	P	Ragged Point	San Luis Obispo County	California	United States	North America	Jurassic	Late Jurassic	Franciscan		Jurassic	
V4958	V	Oakley Ranch	San Luis Obispo County	California	United States	North America	Jurassic	Late Jurassic	Franciscan		Late Jurassic	

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Figure 31: Results of UC Berkeley Musuem of Paleontology Database

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 biological 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) 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) None of the project components will cross an active fault or A-P zone, although the project site is approximately 7 miles southwest from the epicenter of the San Simeon Earthquake of 2003. Modular structures are single story and prefabricated to standard specifications that adhere to the California Building Code and State of California Seismic Safety Commission. No impact.

a.ii) Modular structures are single story and prefabricated to standard specifications that adhere to the California Building Code and State of California Seismic Safety Commission. Compliance with relevant provisions of the California Building Code will ensure new construction is designed to resist seismic shaking. No impact.

a.iii) Modular structures are single story and prefabricated to standard specifications that adhere to the California Building Code and State of California Seismic Safety Commission. The project will install modular buildings on gravel and concrete pads and all subgrade earthwork will be compacted to 90% for non-load bearing and 95% compaction for pads, utilities and roads and be tested by a certified geologist and certified soils lab results will be cleared with CDPR through the submittal process. Compliance with relevant provisions of the California Building Code will ensure new construction is designed to resist liquefaction. No impact.

a.iv) Based on the geology and soils present the project is not located in areas subject to landslide risk. The project will install modular buildings on gravel and concrete pads and all subgrade earthwork will be compacted to 90% for non-load bearing and 95% compaction for pads, utilities and roads and be tested by a certified geologist and certified soils lab results will be cleared with CDPR through the submittal process. Compliance with relevant provisions of the California Building Code will ensure new construction is designed to resist any potential landslides. No impact.

b) A Stormwater Pollution Prevention Plan (SWPPP) will be in place for the project and project activities at Site 1 and 2 that have already occurred included a Stormwater Soil Loss Prevention Plan (SWSLPP). BMPs will be in place in order to comply with SWPPP and SWSLPP for all project activities. Sites 1 and 3 occur in non-agricultural soils with little topsoil and mostly rocky shallow soils. Sites 2 and 4 occur in loam soils with ample topsoil. Previous development and disturbance at both sites have reduced the presence of topsoil within the project areas. Furthermore, geotechnical compaction will be subject to testing and approval by a certified geologist and laboratory to standard building codes. Less than significant impact.

c) The four project areas are not within unstable geologic units or soils. No impact.

d) Expansive soils are not found within the project areas and pads will be prepared and contain subgrade compaction and gravel foundations. No impact.

e) All project areas will have sewer utilities except for Site 1. A soils report was conducted to ensure the soils and geology are suitable for the proposed septic tank installation. No impact.

f) No paleontological or unique geologic features are found within or adjacent to any of the four project areas nor have any been identified during past or current paleontological surveys. No impact.

STANDARD PROJECT REQUIREMENTS

GEO-1: 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. For example, Site 1 will require BMPs to be in place along the slopes below the modular site.

GEO- 2: All earthwork and subgrade work will be inspected by a certified geologist and approved via the submittal process to ensure compaction is approved for compliance with geology and soils specifications. Concrete work will also be tested for pass/fail by a certified lab for compliance with project structural specifications.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

VII. GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL 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, requires 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.

In December 2009, the Natural Resource Agency adopted amendments to the guidelines for Implementation of the California Environmental Quality Act 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."

California State Parks (CSP) 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, Undated).

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.

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.

   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, particularly during grading and earthwork. Project vehicles and heavy equipment is expected to consist of an excavator, bulldozer, grader, roller, rubber tire loader, backhoe, paver, and dump truck.

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 grading and construction-related greenhouse gas emissions would be short-term, estimated at approximately 14 days per site for a total of approximately 56 days. Therefore, the project construction phase would not significantly increase greenhouse emissions.

GHGs would also be produced by staff accessing the facilities by vehicle. However, as is noted in the "Transportation" section of this document, many of these vehicle trips would occur with or without the project as many of the trips to the current site are the result of convenience stop off Highway 101.

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.

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

GHGs (CO2, CH4, 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 CO2e; ORr 4.9 MT CO2e/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 pre-fabricated modular structures, 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.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

VIII. HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL SETTING

The project sites are located in rural San Luis Obispo County, under the jurisdiction of San Luis Obispo County Environmental Health Services. Sites 1, and 4 are located in close proximity to operations that utilize hazardous materials storage. At the Visitor Center Maintenance Facility next to site 4, compressed natural gas, gasoline, diesel, hydraulic fluids, and motor oils are stored. Adjacent to Site 1 on elephant hill, restoration services include the storage of paints and paint thinners including acetone. Also on elephant hill, the water treatment plant requires the storage of acid, chlorine and related chemicals. Present at all 4 sites are propane storage tanks. As a result, the SLO Coast District complies with a Certified Unified Program Agency (CUPA) hazardous materials inspection program. This program is contained in the SLO Coast District Business Plan kept on file at the District Office. Inventories of hazardous materials are kept along with site layout/facility maps which are submitted electronically to County Environmental Health Services. The program is part of the District's Emergency Response Plan and its Training Plan. Sites 2 and 4 are each within 2 miles of private use airports.

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) Other than the installation of propane tanks at Site 2, the Project will not add to or create new hazards to staff or the public. As stated above the CUPA program already monitors the routine use of hazardous materials in day-to-day operations. The Emergency Response Plan, Business Plan, Spill Prevention Plan, and the Training Plan, the CUPA along with implementation of Project Specific Requirement HAZ - 1 Hazardous Materials, impacts from the project remain less than significant.

b) Project construction would require the use of heavy equipment and vehicles that use diesel fuel, 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. The project will have a less than significant impact.

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

d) 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. The project will have a less than significant impact.

e) As noted in the Environmental Settings above, two of the project sites are located within two miles of a private use airports. However, these private use airports/landing strips are seldom used and do not impact sensitive receptors such as residences. No impact.

f) By adding fire hydrants, the project will enhance emergency response to fires. All construction activities associated with the project would occur within the boundaries of HSSSHM or HSSSP, and work would not restrict access to or block any public road outside the immediate construction area. DPR will ensure that emergency access would be maintained at all times. No impact.

g) Because the project will install fire hydrants at 4 of the sites, fire sprinklers, and use non-combustible exterior building materials, the risk to injury or death from wildland or structure fires will be significantly reduced. Strict adherence to the project conditions and minimization measures below will ensure that impacts from fire will remain at a less than significant level.

STANDARD PROJECT REQUIREMENTS

HAZ 1 – HAZARDOUS MATERIALS

- 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.

- Prior to the start of on-site construction activities, Contractor will prepare a Spill Prevention and Response Plan (SPRP) as part of the Storm Water Pollution Prevention Plan (SWPPP) for DPR 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 is not 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.
  - ✓ identification of lawfully permitted or authorized disposal destinations outside of the project site.

- Contractor will set up decontamination areas for vehicles and equipment at Park entry/exit points. The decontamination areas will be designed to completely contain all wash water generated from washing vehicles and equipment. Best Management Practices (BMPs) will be installed, as necessary, to prevent the dispersal of wash water beyond the boundaries of the decontamination area, including over-spray.
- 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).

- All heavy equipment will be required to include spark arrestors or turbo chargers (which eliminate sparks in exhaust) and have fire extinguishers on-site.
- Construction crews will park vehicles away 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.
- 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.

PROJECT SPECIFIC REQUIREMENTS

None Required.

MITIGATION MEASURES

None required.

IX. HYDROLOGY AND WATER QUALITY

This section provides the setting and scope for the environmental impact analysis of the ND for hydrology and water quality which contains a discussion on the environmental setting focusing on what resources are present within and adjacent to the Project sites. The regulatory setting of hydrology and water quality is also discussed including the descriptions of federal, state, and/or local regulations that are applicable to the Project sites. For the analysis of hydrologic resources, this ND focuses on the potential for the Project to impact water quality, groundwater availability, runoff and drainage, and erosion. This analysis of hydrology and water 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 California Environmental Quality Act (CEQA) Guidelines and modified as needed to address potential Project impacts.

ENVIRONMENTAL SETTING

For the environmental setting of the Office Modular Installation, Relocation, and Replacement Project, a 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.

Information from 2010 census records indicate the population of the region is 1,528,708, with the majority living in the following metropolitan areas: Santa Barbara, San Luis

Obispo, Salinas/Monterey, and Santa Cruz. Most of the remaining region is sparsely populated with a few small agricultural and metropolitan areas scattered throughout the region (CDWR, 2015).

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 till 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 Project sites (Panel #06079C0295H for Sites 1 and Site 3, #06079C0530G for Site 2, #06079C0293H for Site 4) indicate that Project Site 2 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.

All four of the Project sites are located in San Luis Obispo County and lie within the jurisdiction of the Central Coast Regional Water Quality Control Board. 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.

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 hydrology and water quality are addressed under these thresholds and mitigation measures specific impacts are designed in order to avoid or reduce impacts below levels of significance.

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. Figures 36-38 provide maps of the Project layout including the locations of project infrastructure in relation to present hydrologic resources within the Project sites. These maps represent and reference where certain impacts would occur with the current Project plans.

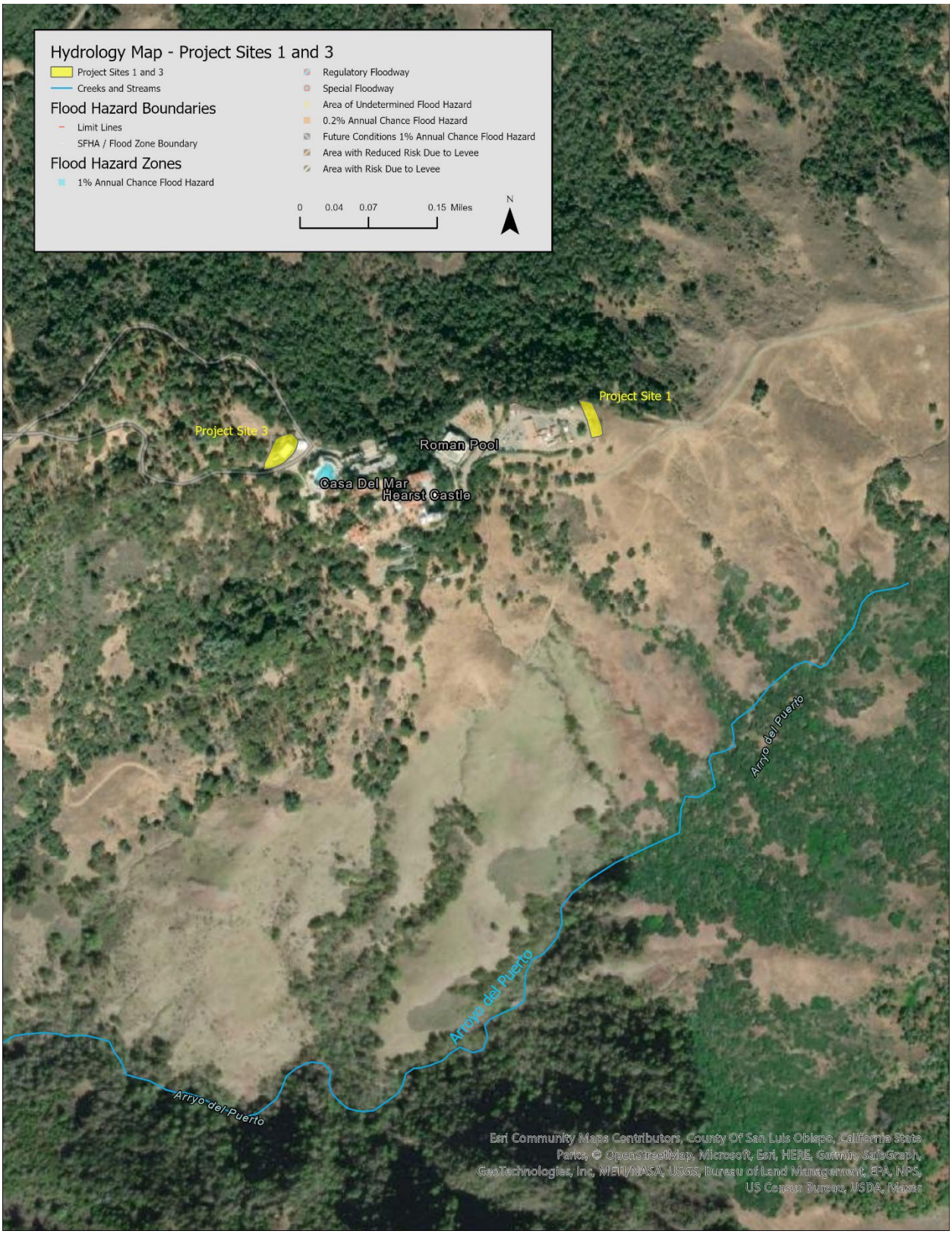

Figure 32. Hydrology Map for Project Site 1 (Elephant Hill Modulars) and Site 3 (Guide Complex Modulars).

Figure 33. Hydrology Map for Project Site 2 (San Simeon Creek Modulars).

Figure 34. Hydrology Map for Project Site 4 (District Office Modulars).

Thresholds of Significance and Determinations of Impacts

Would the project:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
e) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
f) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
g) 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:	☐	☐	☐	☒
h) Result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
a. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
b. 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	☐	☐	☐	☒
c. impede or redirect flood flows?	☐	☐	☐	☒
i) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
j) Conflict with or obstruct implementation of a water quality	☐	☐	☐	☒

control plan or sustainable groundwater management plan?

DISCUSSION

a) 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 (CSP C. S., 2007). Standard project requirements including staging and refueling equipment setbacks from waterways and sediment control, and pollution prevention requirements are anticipated to offset potential impacts to hydrology and water quality. Therefore, the project will have a less than significant impact on water quality standards.

b) For Project Sites 1 and 3, the water supply is provided by a freshwater spring located approximately 3.5 feet/miles from the Hearst Castle State Historical Monument. Water from the spring is transported via an aboveground, gravity-fed, water line that was first constructed when the monument was originally built.

Project Sites 2 and 4 are both located in the San Simeon Community Services Water District. The District water supply comes from Pico Creek. Pico Creek is a perennial stream that fluctuates based on groundwater levels in the upstream watershed as well as rainfall. The groundwater basin associated with the creek is the sole source of potable water for the community.

The District's well field consists of two primary production wells. Well # 1 was constructed in 1952; Well # 2 was constructed in 1967. This well field draws water from the Pico Creek underflow. The State Water Resources Control Board permits the District of San Simeon to divert up to 140 acre-feet of water per calendar year at a rate of .27 cubic feet per second.

The District has one reservoir that provides 150,000 gallons (0.15 MG) of regulatory, fire, and emergency storage. The most recent Water Master Plan (2007) determined that 19 percent of historic water consumption was attributed to residential uses, 3 percent was attributed to commercial uses, 57 percent was attributed to hotel/motel use, 13 percent to restaurant uses, and 7 percent was attributed to other use.

As noted in the Environmental Setting above, groundwater levels in the groundwater basin have been generally stable. Well elevation levels generally do

not drop below a minimum elevation during droughts. It is not anticipated that the project would have an impact on current groundwater levels.

c) The proposed project entails no work in the vicinity of a stream or river. Nevertheless, the proposed modular buildings will result in an increase of impervious surface from the structures and parking area However, the project sites are all located adjacent to existing natural bioswale areas which would collect runoff and encourage infiltration of storm waters. As such, it can be with certainty that the proposed Project would have a less than significant impact on area drainage patterns.

d) The proposed Project sites are not directly located within a floodplain area per the FEMA Flood Insurance Rate Map. No impacts are anticipated.

e) The San Luis Obispo County Groundwater Sustainability Agency is responsible for adopting and implementing Groundwater Sustainability Plans. There is currently no plan for the groundwater basin where the Project sites are proposed. Regardless, the Project would not obstruct the Agency's future implementation of a groundwater management plan.

f) With respect to a water quality control plan, the proposed Project complies with the water quality standards. No impacts are anticipated for water quality and groundwater management.

STANDARD PROJECT REQUIREMENTS

- **HYDRO-1:** All refueling/servicing of equipment, solid waste disposal and worksite sanitation stations must occur in designated staging areas away from flowing water.
-
- **HYDRO-2:** Implement standard erosion, sediment control, and pollution prevention requirements.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

X. LAND USE AND PLANNING

Hearst Castle and the San Simeon Campground are located in a rural setting on the north coast of San Luis Obispo and are designated as Rural Recreation and Camping 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 sites are 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.

Because Hearst Castle is protected by covenants and restrictions and the surrounding privately owned Hearst Ranch is protected by a scenic conservation easement, the modular projects may not impair the scenic viewshed or conservation values.

The goal of the Scenic Conservation Easement is to maintain the existing viewshed and in particular, views toward the ocean, and views from the ranch toward projects on State Park lands, either on the West Side Public Ownership area or toward the castle and its support operations.

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. The project sites are located in existing, rural, recreational facilities at a designated historical monument and a campground which already have existing highway access. As such, the proposed Project would have no potential to divide an established community. No impact would result.

b. While the proposed project does involve development in historically and environmentally sensitive areas, the project has sufficient avoidance and minimization 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. No impact to any land use plan, policy or regulation would result.

STANDARD PROJECT REQUIREMENTS

None Required.

PROJECT SPECIFIC REQUIREMENTS

None Required.

MITIGATION MEASURES

None Required.

XI. NOISE

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 11-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) (CDPR 2004).

Sensitive Noise Receptors

The total area of the combined sites is 60,500. Each site is located in a recreational zoned parcel within a State Park or Historical Monument Much of the surrounding land uses are comprised of open spaces including agricultural and recreational lands. Although there are 2 existing State Park residences in the San Simeon Campground and existing campsites for visitors, the proposed project will add three more State Park residences. These are all considered sensitive receptors.

Existing Ambient Noise Environment

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

Although Site 2 is located close to the main transportation route (California Highway 1) the level of vehicle-related traffic varies depending on the time of day and the season of the year. Other, minor sources of noise may originate from activities taking place within the park, such as people talking on trails, campground activity, and occasional air traffic consisting of small private planes, Coast Guard helicopters, or the occasional military aircraft. Sites 1, 3 and 4 are in proximity to two private landing strips or runways: one located across San Simeon Creek Rd from the campground, and the other on Hearst Ranch at the base of the hill.

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

Hearst San Simeon State Park 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.

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) 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 occurs 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 day-time. All of the Sites are in non-public areas and there is no reason for park visitors to venture to these locations, but periodic but temporary construction-related noise will still be audible at a distance to campers or visitors.

Due to the brief duration of exposure, and with implementation of **Standard Project Requirement - NOISE 1** and **Specific Project Requirement - NOISE 2**, 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) Groundborne vibration and groundborne noise results from the use of heavy construction equipment and may vary depending on the specific construction equipment used and 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. There would be a less than significant impact.

c) 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.

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.

XII. POPULATION AND HOUSING

ENVIRONMENTAL SETTING

As previously mentioned, Hearst San Simeon State Park and the Monument are located in rural, open space, and recreational areas. The campground site is located one mile north of residences in the community of Cambria, which has a population of approximately 5,500 (2020). Private housing in the retirement community is limited due to water supply and the related moratorium on new construction. As a result, housing prices are high and generally unaffordable to civil service labor and law enforcement. Housing within the park boundaries is limited and restricted to campgrounds and park labor residences.

As previously mentioned, state park employee housing is offered as a benefit to certain job classifications in order to attract workers to the rural and high-priced property locations. But worker residential opportunities within park boundaries are very limited.

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) The proposed project will not require development of a new water or sewer system (other than a new holding tank on Elephant Hill) and is solely for existing park operations. Due to existing space constraints, no growth inducing impacts would result on population growth or housing.

b) The Proposed Project would neither modify nor displace any existing housing and would displace no one, either temporarily or permanently. No impact.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

XIII. PUBLIC SERVICES

ENVIRONMENTAL SETTING

As previously mentioned, Hearst San Simeon State Park and the Monument are located in rural and open space recreational areas surrounded by agriculture, just north of the unincorporated community of Cambria. In addition to providing camping and the art museum, 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

Hearst Castle has its own fire department staffed by full-time firefighter security officers. Cal Fire has the primary responsibility for all fire response and their nearest fire station is located in Cambria, 5 miles south of the Visitor Center. Hearst Castle is a State Responsibility Area (SRA) which falls under CalFire jurisdiction. The Park has a Type 1 structure fire engine, a Type 3 off-road engine and the 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 and Other Public Facilities

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 recreation opportunities for local residents and for visitors from around the world as well.

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) The replacement, relocation and addition of modular facilities will not increase response times or increase population that would necessitate construction of any new or altered government facilities. Furthermore, the Project will not generate new visitation at levels substantial enough to cause an impact to the park or other surrounding public facilities. No impact.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

XIV. RECREATION

ENVIRONMENTAL SETTING

HSSSP and the Historical Monument are located in the rural North Coast of San Luis Obispo County, about a 5-minute drive north of Cambria. Construction of the monument, or Hearst Castle started in 1920, but was not fully completed by the time of WR Hearst's death in 1951. The Hearst Corporation gifted the monument and the surrounding 160 acres to the State of California in 1958. The castle has been open to the public since 1958 and averages approximately 700,000 visitors per year. Conditions of the gift included keeping the castle open to the public, for public, educational, and interpretive purposes.

At the San Simeon Creek and Washburn campgrounds, there are 201 family campsites. The campgrounds provide easy access to a trail network that includes boardwalks through a wetland and Natural Preserve, trails through Monterey Pine forests, and access to the beach. Across the highway from the Visitor Center is a pier and the NOAA operated Coastal Discovery Center which is a marine biology educational and interpretive center. The pier and the campground are connected by 5 miles of scenic beach. Along this stretch of highway or Scenic Byway are 5 day-use parking areas, pull-outs, beach access points and several picnic and barbeque areas and public restrooms. In the SLO Coast District, day-use and restroom access is free. Other recreational activities in the area include fishing, kayaking, boating and cycling. CDPR offers interpretive talks and guided hikes on a seasonal basis.

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) Because the proposed Project consists of replacing and adding modulars for the benefit of park service employees, it will enhance services to park visitors of HSSSP and the monument, but not at the expense of local or regional parks. Therefore, the project would not result in any increase in the use of neighborhood or other regional parks, and thus would not result in the physical deterioration of said facilities. No impact.

b) This project only relates to improving facilities for park service employees and does not include expansion of “recreational facilities” for visitors. As such, there would be no environmental impacts associated with expansion of recreational facilities. No impact.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

XV. TRANSPORTATION

ENVIRONMENTAL SETTING

The project sites are accessed from California Highway 1 and Hearst Castle Rd. or San Simeon Creek Rd. for the campground. As discussed in the Noise Pollution analysis, use of Highway 1 is variable and dependent on season and time of day. 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.

The campground is the first driveway on San Simeon Creek Rd. from Highway 1. As such, it is only used for approximately 400 yards before the entrance to the campground. In this section of San Simeon Creek Rd., the County maintained road is wide and has ample shoulders. There is a turning lane into the campground and the interior campground roads are wide, in good condition, and are safe for campground traffic.

Hearst Castle Rd. connects Highway 1 to the Visitor Center and the road is also wide, with wide curving roads kept in good condition providing ample line of sight, and are safe for all types and sizes of vehicles. The existing access roads utilize modern design with more than adequate widths, built to Caltrans standards, that are accessible to even the largest and heaviest of fire engines, utility trucks, long haul trailers, and RV's. There are turning lanes from Highway 1 onto Hearst Castle Rd.

Once in the Visitor Center parking lot, visitors are bused up the hill to the Castle in fifty passenger, compressed natural gas (CNG) powered buses. The Visitor Center also provides fourteen photo-voltaic, solar powered EV charging connections. As previously mentioned, the District has a growing fleet of EV's for staff to use in their day-to-day operations. This project will add six EV charging connections to Elephant Hill for staff to use.

For regional travel to the project sites, it is possible to travel to the Castle or the campground 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 San Simeon.

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

DISCUSSION

The Proposed Project consists of the replacement of existing modular offices in the same location and footprint as existing, and the addition of three, new office modulars on Elephant Hill and the addition of three, new small modulars at the campground. These sites are well served by an existing highway, county road and Hearst Castle Rd.

a) The project would not conflict with an existing transportation or traffic plan, policy or ordinance. The project is well served by existing roads and infrastructure and it provides additional parking spaces and increases the number of Accessible parking spaces consistent with the Department's Accessibility Plan. as required by local ordinances. No impact.

b) Because the project is located within one-half mile of an existing major transit stop at the Visitor Center and is along an existing high quality transit corridor, namely the Highway 1 Scenic Byway, it is presumed to cause a less than significant transportation impact, pursuant to CEQA Guideline §15064.3 (b) (1).

c) Because the project does not include major road improvements other than the widening of the access road behind the Guide Office, and because all other existing access roads utilize modern design with more than adequate widths, built to Caltrans standards, that are accessible to even the largest and heaviest of fire engines, utility trucks, long haul trailers, and RV's, the project does not substantially increase road hazards caused by new design features. No impact.

d) The existing access roads are built to handle heavy emergency fire engines (Type-1's) and include fire engine code compliant turnarounds and easy access to fire hydrants. Furthermore, this project widens an emergency fire lane behind the guide office modulars and adds fire hydrants and fire sprinklers to all four sites, subject to the review and approval of the State Fire Marshall. Therefore, it improves emergency access. No impact.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION MEASURES

None required.

XVI. 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

California State Parks 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 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.

TRIBAL CULTURAL RESOURCES SURVEY AND TRIBAL CONSULTATION

Hearst San Simeon State Park (HSSSP) is part of the traditional homelands of Salinan and Northern Chumash people. Santa Ynez Band of Chumash Indians is the only federally recognized tribe amongst the other tribes and contacts officially listed on the Native American contact list 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. For an extended discussion of the Tribal ethnography and prehistory see section IV. Cultural Resources.

A sacred lands files search was submitted to the NAHC on March 10, 2023, and on March 17, 2023. Cody Champagne, NAHC coordinator, responded with a positive search result for the project area (see Appendix D). They requested to contact the Northern Chumash Tribal Council and the Salinan Tribe of Monterey and San Luis Obispo Counties about tribal cultural resources, who were contacted on March 17, 2023. Notification letters for the project and tribal consultation were sent out to all of the contacts provided on the NAHC Native American contact list for the project on March 23, 2023. Letters provided a brief project description, location and description of the four sites, location maps, and design (see Appendix D).

These tribes were contacted, and it was noted that San Simeon Point and area were of special cultural importance to both Salinan and Northern Chumash peoples. The Salinan Tribe of Monterey and San Luis Obispo Counties expressed that San Simeon Point and campground areas are recorded sacred sites to the tribe and requested to be notified if any cultural resources were encountered during the project. The yak tityu tityu yak tiłhini Northern Chumash Tribe responded via telephone about the project and if any additional ground disturbance would occur for Site 2, and if so, requested a tribal monitor from their tribe be onsite for the work. The Xolon Salinan Tribe responded on March 27, 2023, stating they had documented sites and homesteads relating to the tribe in San Simeon, Hearst Castle and at Site 2 and that San Simeon Point was a sacred location. They requested to be notified if anything was discovered during the project.

Penny Hurt from the Xolon Salinan Tribe followed up with a phone call to Mr. Jackson on April 11, 2023, stating the tribe had known resources within the project areas and only wanted to be informed if any tribal cultural resources were uncovered during the project. She also stated they had a sacred site at San Simeon Point.

Karen White from the Xolon Salinan Tribe followed up on May 1, 2023, via phone and asked she be notified of project updates and would be getting back to Mr. Jackson about

additional information. Mr. Jackson agreed to inform all interested parties of project-related ground disturbing activities and if any tribal cultural resources are uncovered or discovered during the project. He also informed them of the previous work and archaeological and tribal monitoring that occurred, and observations made during monitoring.

Prior to the preparation of this study, tribal notification occurred for the earlier utility projects for Site 1 and 2 associated with this project. Tribal consultation was initiated via email on September 27, 2022, with the Salinan Tribe of Monterey and San Luis Obispo Counties and the yak tityu tityu yak tiłhini Northern Chumash Tribe. The yak tityu tityu yak tiłhini responded on September 28, 2022, and the Salinan Tribe of Monterey and SLO Counties responded on October 14, 2022, both stating there were resources in the vicinity of Site 2 and would like ground disturbing activities to be monitored by a tribal monitor. Due to the proximity of cultural resources to Site 2, the yak tityu tityu yak tiłhini Northern Chumash and the Salinan Tribe of Monterey and San Luis Obispo Counties were contacted for tribal monitoring of utility work that was to occur for the project. Utility work was completed from September 2022 through January 2023 with tribal monitoring accompanying archaeological monitoring of ground disturbing activities at Site 2. The work resulted in no impact to tribal cultural resources. No other tribal cultural resources have been identified directly within the project areas for all four sites.

WOULD THE PROJECT:		POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
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

No tribal cultural resources have been identified directly within the project area, and no impacts are expected to occur. Standard project measures regarding inadvertent finds of cultural resources or human remains during project implementation will ensure no impact occurs to tribal cultural resources.

STANDARD PROJECT REQUIREMENTS

CULT-1 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 CDPR staff 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. The staff will be instructed to halt work in the event that any such cultural resources are unearthed.

CULT-2 If any previously undocumented cultural resources are encountered within the project (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, Historian or a DPR-qualified cultural resource specialist has evaluated the find and implemented appropriate treatment and regulatory compliance.

CULT-3 In the event human remains are discovered work will cease in the immediate area of the find until further notice and the onsite CDPR 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. The County Coroner's office will make the determination whether any human remains are of prehistoric Native American origin or subject to further law enforcement investigation. If the coroner determines the remains are of Native American origin, they will contact the NAHC within 24 hours. The NAHC will appoint a Most Likely Descendant (MLD). The MLD will have 48 hours from the time of the appointment to visit the site and determine the appropriate treatment and disposition of the human remains and anything subject to AB 275. Work is not to resume in the area of the find until proper disposition is complete (PRC §5097.98). If a Native American monitor is on-site at the time of the discovery, onsite CDPR staff will work with them to ensure any human remains and/or funerary objects are left in place or returned to the point of discovery and covered with soil until further notice.

PROJECT SPECIFIC REQUIREMENTS

CULT-4 Archaeological monitoring and tribal monitoring will be required for any excavations within previously undisturbed soils at Site 2. Archaeological monitoring will be required for excavation for the septic tank at Site 1.

MITIGATION MEASURES

None required.

XVII. UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL SETTING

Hearst Castle relies on old legacy utility and service systems that for the most part were installed during W.R. Hearst's tenure. These include the original PG&E service line that runs approximately 5 miles north up-canyon from Highway 1 on undersized and sporadic power poles and terminates next to the historic greenhouses, and the original 6-mile-long water supply line fed by springs over the ridgeline south of the castle. The original direct bury copper telephone line is still in service today.

To the extent practical given the landlocked nature of the castle, these systems have been upgraded and augmented on the DPR castle parcel. Electrical distribution lines on the hilltop have been upgraded with new electrical lines, conduit, a transformer, panels, and a back-up generator. Telecom now includes cellular service from the 2 faux, mono-pine cell towers located behind the guide office trailers as well as a wireless broadband internet service transmitted uphill from the Visitor Center to the castle.

The Visitor Center located on Highway 1 is now served with fiber optic cable for high-speed internet and uses a 672-kilowatt photo voltaic solar array to provide electricity to the Visitor Center and District Office complex. The system is grid-tied and provides excess electricity back to the electrical grid.

At the Guide Office complex, wastewater management is provided by individual septic systems with leach fields. The new Elephant Hill Office complex will include installation of two 6,000-gallon septic holding tanks which will be pumped by a service company. At the District Office and the new San Simeon Campground modulars, wastewater is pumped and treated by the San Simeon Community Services District and the Cambria Community Services District, respectively. At all sites, the refuse is collected in dumpsters and transported to a landfill by a local refuse disposal company.

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) The project does not require the construction of new water, and wastewater treatment systems or additional electrical power sources. The increased roof area and improved site and parking spaces will require additional storm water drainage, but use of BMP's such as drain-pipe diffusers or rip rap will reduce impacts to less than significant.

b) The District Office Modular Replacement site and the San Simeon Campground site are currently served by the San Simeon Community Services District and the Cambria Community Services District for wastewater treatment, respectively. The District Office site will not increase wastewater flow to San Simeon CSD as this site only involves replacement. The three new residential modulars at the San Simeon campground site will increase wastewater flows to the Cambria CSD. Elephant Hill

will utilize a new septic holding tank which will be pumped by a sanitary service. The Guide Office site currently uses a leach field and will continue to do so, with no projected increased outflows. On a combined basis, the slightly increased wastewater outflow will be less than significant.

c) The slightly increased wastewater outflow is unlikely to result in a determination by the provider that it lacks capacity for the minor increase. The minor increase in outflow will be less than significant.

d) The minor increase in solid waste generated by the three new modulars at the campground would not significantly increase the park's waste generation or solid waste disposal needs, which includes campers' trash, the largest source of solid waste. Therefore, this project would have a less than significant impact.

e) Waste generated by the project will be stored in appropriate receptacles and removed daily or as needed. No impact.

STANDARD PROJECT REQUIREMENTS

None required.

PROJECT SPECIFIC REQUIREMENTS

None required.

MITIGATION REQUIREMENTS

None required.

XVIII. WILDFIRE

ENVIRONMENTAL SETTING

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

Hearst San Simeon State Park has a draft Local Operation Agreement (pending CalFire review) and a California State Parks, Hearst Castle Fire Department Pre-Fire Plans, Hearst San Simeon State Historical Monument and Visitor Center (2013), which provides the necessary information for fire control in HSSSP. An objective of the 2013 plan is to take initial control action on all fires in any area considered threatening to Park System lands, including private or other public lands adjacent to the unit boundary.

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. All project sites are located within the State Responsibility Area. Hearst Castle and the San Simeon Campground Modular site are in a High Severity Zone, while the District Office Modular Site is in a Moderate Fire Severity Zone (Office of the State Fire Marshall, 4/12/23).

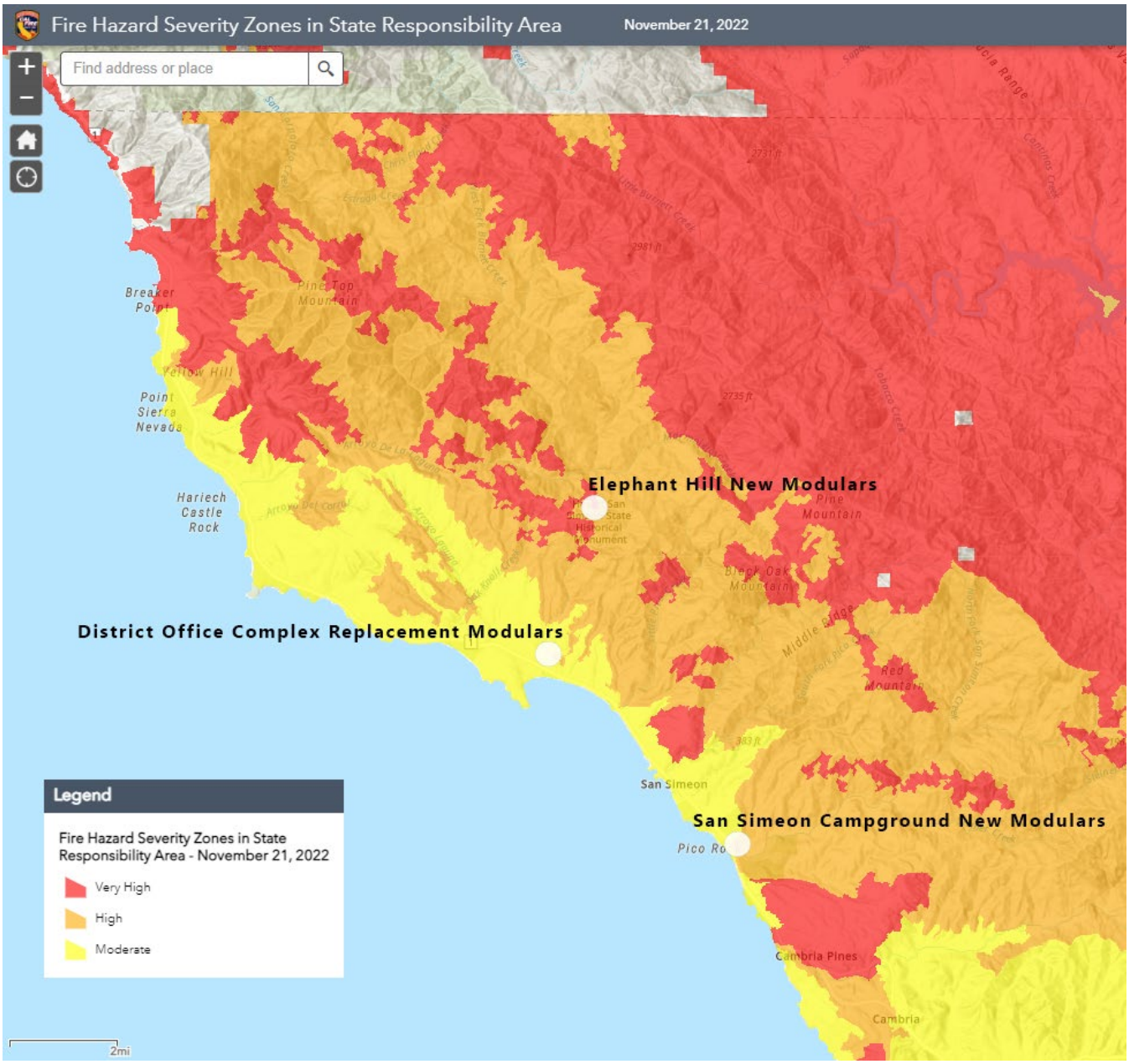

Figure 35: Fire Hazard Severity Zones-Office of the State Fire Marshall. https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/ accessed 4/12/23. Yellow=Moderate, Orange=High, Red=Very High. Hearst Castle and the San Simeon Campground Modular site are in a High Severity Zone, while the District Office Modular Site is in a Moderate Fire 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 moistures also decrease. 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.

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) The proposed projects are all located within existing infrastructure supporting Hearst Castle visitation, District headquarters offices, and the San Simeon Campground. Roads are well maintained and consist primarily of two lanes. The buildings proposed at the San Simeon Creek Campground are accessible on a single lane paved road. Hydrants are installed at all locations. Although the San Simeon Creek Campground segment of the project has a single road, this road is adjacent to two-laned roads and good access with hydrant access. This access and available hydrants would reduce the hazards of a single lane road. The proposed project will not impair an adopted emergency response plan or emergency evacuation plan. Less than significant.

b) The Proposed Project consists of the construction of new and replacement modular facilities on relatively level sites in areas designated as having a high (Castle and Campground) and moderate (District Office) risk of wildland fire. Structures associated with the Project will be composed of fire-resistant materials, and new hydrants/fire flow is present on the site. As such, it can be seen with certainty that the development will not exacerbate wildfire risks, exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Less than significant.

c) 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). All new utilities installed for the project will be underground, minimizing the potential for downed trees and limbs to ignite wildland fires. As such, maintenance of these systems will not exacerbate fire risks or otherwise result in impacts to the environment. Less than significant.

d) Given the setting of all Project Site components being on relatively level ground, and the project design, which incorporates California Building Code 7A fire protection measures, and appropriate BMPs, 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. Less than significant impact.

STANDARD PROJECT REQUIRMENTS

None required.

PROJECT SPECIFIC REQUIRMENTS

None required.

MITIGATION MEASURES

None required.

Chapter 4 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 in Section IV above, all potential biological related impacts would be less than significant with implementation of the BMP's identified in the Project Requirements Table 1. Less than significant impact.

b) As identified in Section V above, the Elephant Hill site is a known historically sensitive area of former historical structures, primarily the octagonal zoo enclosure. As noted in Section V, implementation of the BMP's, including protection in place of the historic Deodar Cedar will reduce impacts to less than significant. While known archaeological resources are present near the campground, conditions of approval including Native American monitoring and stop work orders in the event of discovery of archaeological resources will reduce impacts to less than significant.

c) The project has combined sub-projects at each of four sites in order to evaluate cumulative impacts. When viewed as a whole, cumulative impacts have arisen with respect to total area of disturbance (over 60,000 square feet), grading, and installation of hard surfaces, which has the potential to alter drainage, erosion, and water quality. As a condition of approval, a SWPPP will be required and BMP's such as outflow dissipation or rip-rap will be required. Potential air quality, greenhouse gas emissions, hydrology, and traffic impacts are discussed in the respective sections above. The project would not increase the demands for public services, increase traffic and air pollution, or induce growth in the North Coast of San Luis Obispo County. Together, these avoidance and minimization measures will result in a less than significant impact.

d) All potential impacts identified in this ND are less than significant with project requirements and do not require mitigation. Therefore, the proposed project would not result in environmental effects that cause substantial adverse effects on human being either directly or indirectly. Impacts would be less than significant.

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Chapter 6 Report Preparation

CALIFORNIA DEPARTMENT OF PARKS AND RECREATION

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APPENDIX A. PROJECT DESIGN GRAPHICS AND VISUAL ASSESSMENTS

SITE 1: ELEPHANT HILL MODULAR PROJECT

Photographs of Project Site from Public Tour Routes:

Photograph taken from the Gothic Study window, on the third floor of Casa Grande. The site is obscured by vegetation.

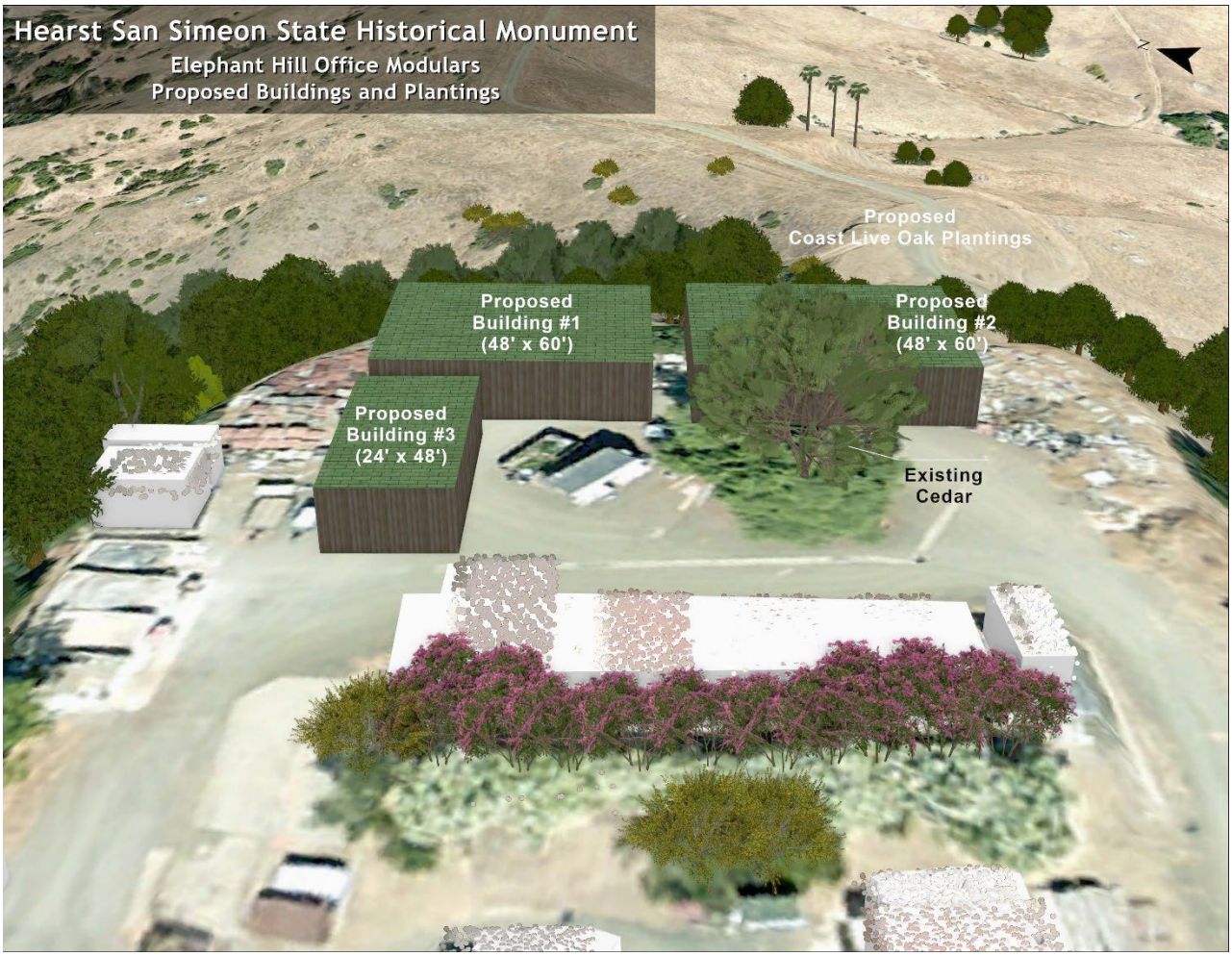
Photograph taken from the Gothic Study, at the typical location where the public stands on tour. The project site is obscured by vegetation.

Photograph taken near the tennis courts, a typical walking area for public tours. The site is largely obscured by vegetation.

Elephant Hill Complex site 1 – avoidance and minimization measures

Visual Assessment:

Key Viewing Area (KVA) locations



Elephant Hill Site 1 - Proposed buildings and plantings

KVA1 Existing conditions

KVA1 Oblique view - existing conditions with visual analysis

KVA1 Proposed buildings and plantings. Proposed modular buildings will be located behind existing garage.

KVA1 Oblique view - proposed conditions with visual analysis

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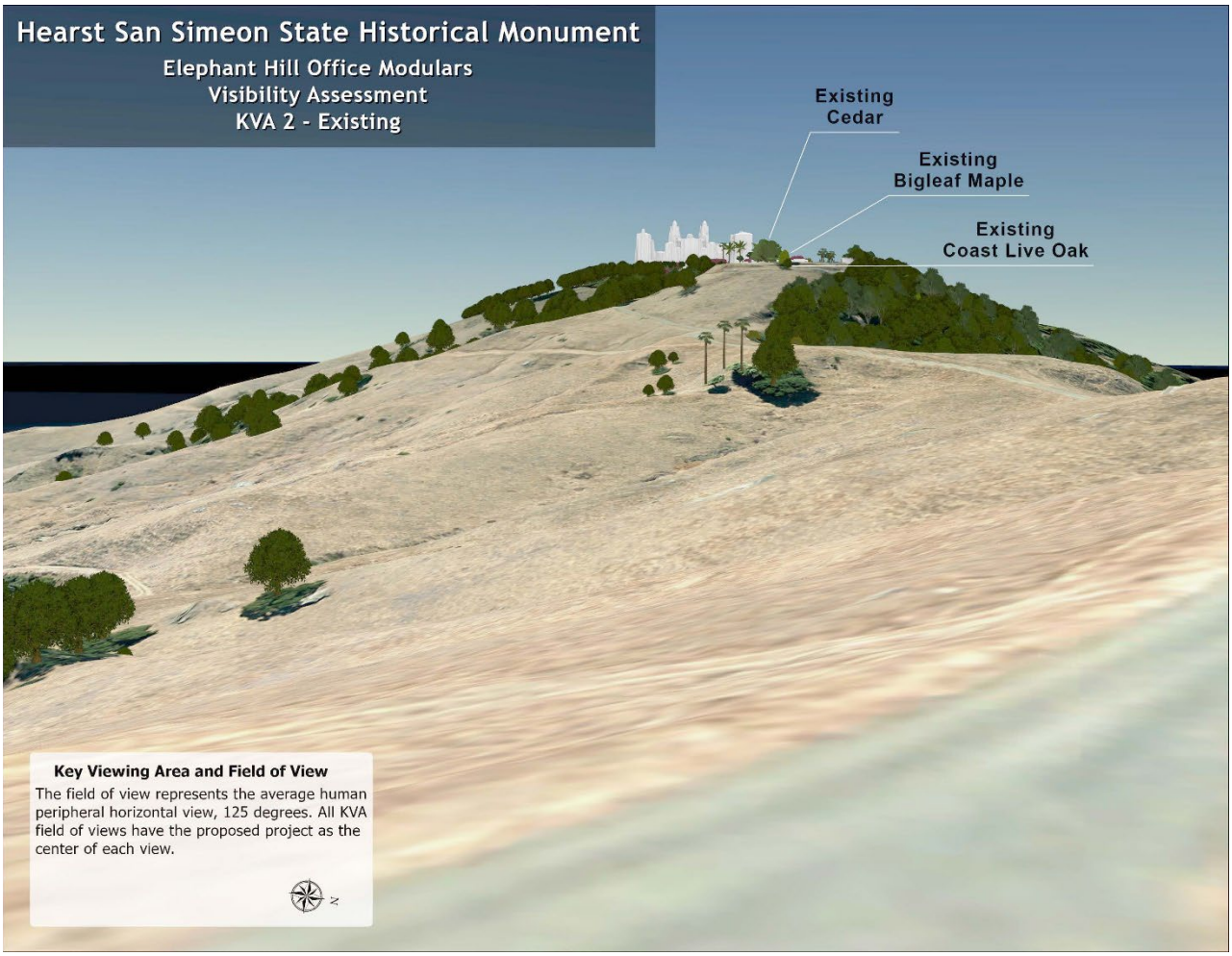
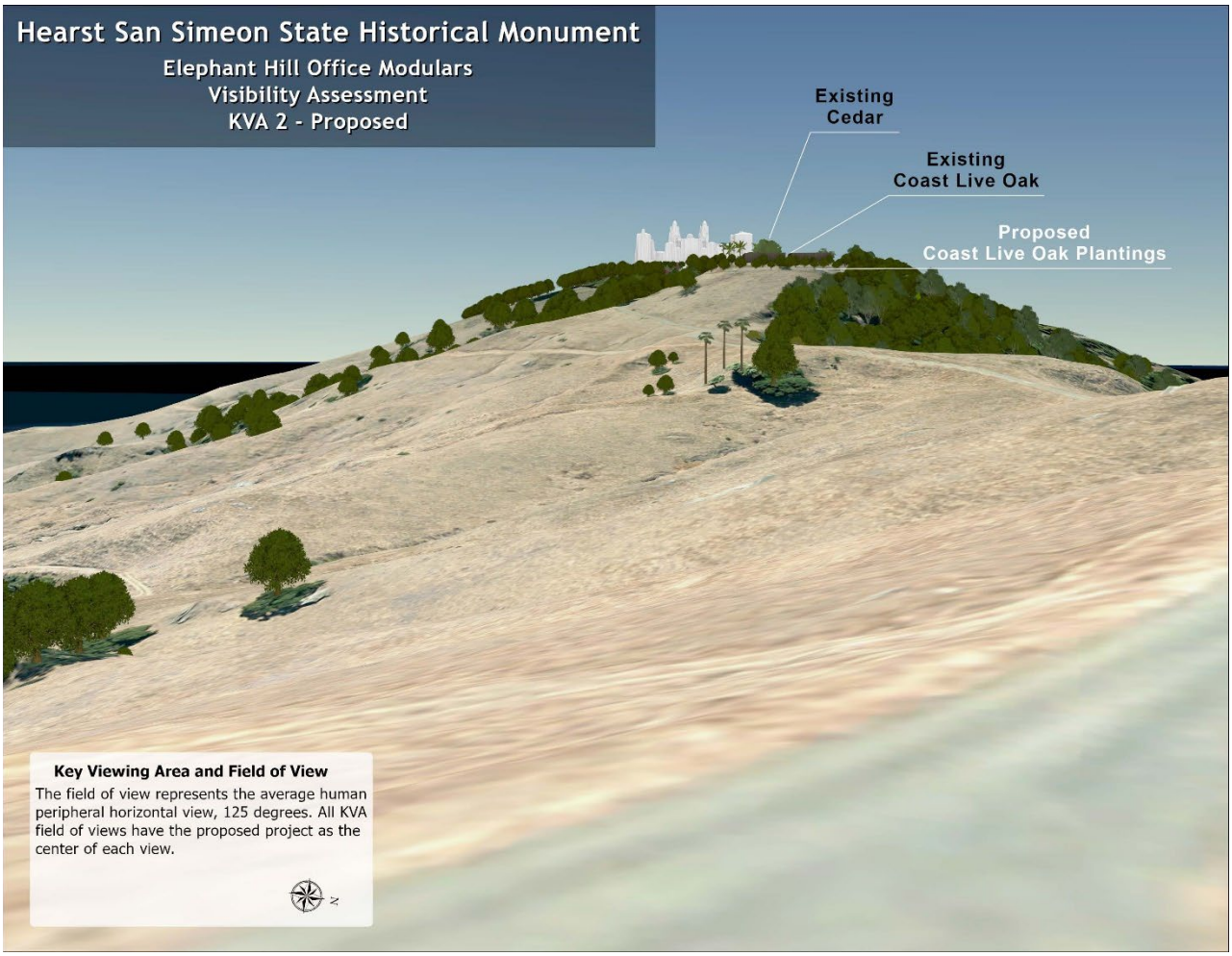


KVA2 Existing conditions

KVA2 Existing conditions – focused view

KVA2 Oblique view - existing conditions with visual analysis



KVA2 Proposed buildings and plantings

KVA2 Proposed buildings and plantings – focused view

KVA2 Oblique view - proposed conditions with visual analysis

SITE 3: GUIDE COMPLEX

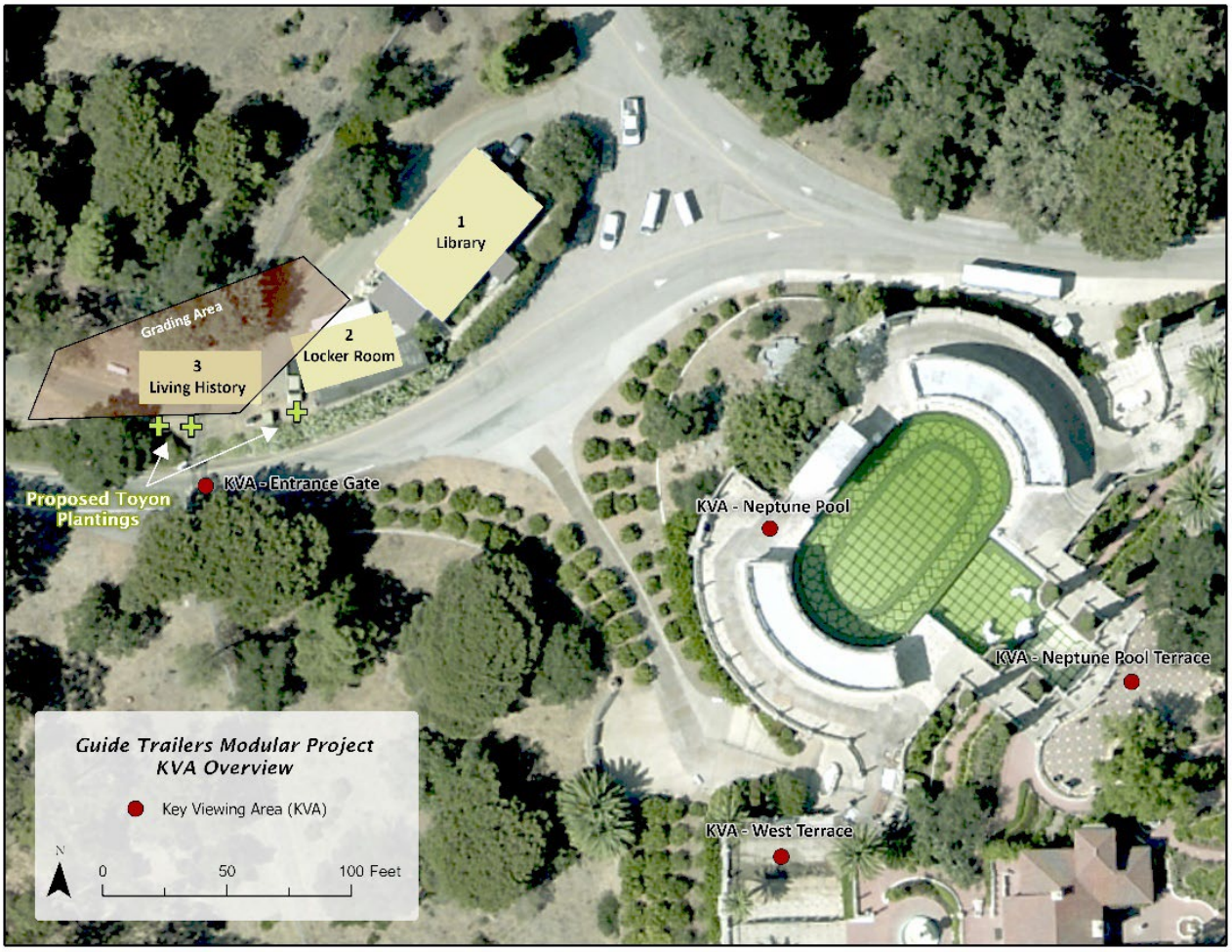
Photographs of Project Site from Public Tour Routes:

This photograph taken from the West Terrace shows glimpses of the current guide trailer complex. The building covered with brown lattice is the most visible from this public viewing area. The new modular building replacing this building will be positioned slightly further back from the road to allow for Toyon trees to screen the building from public view. In addition, the new buildings will have brown-colored roofing, ensuring there is no contrast with surrounding vegetation, as seen with the current, white modular unit.

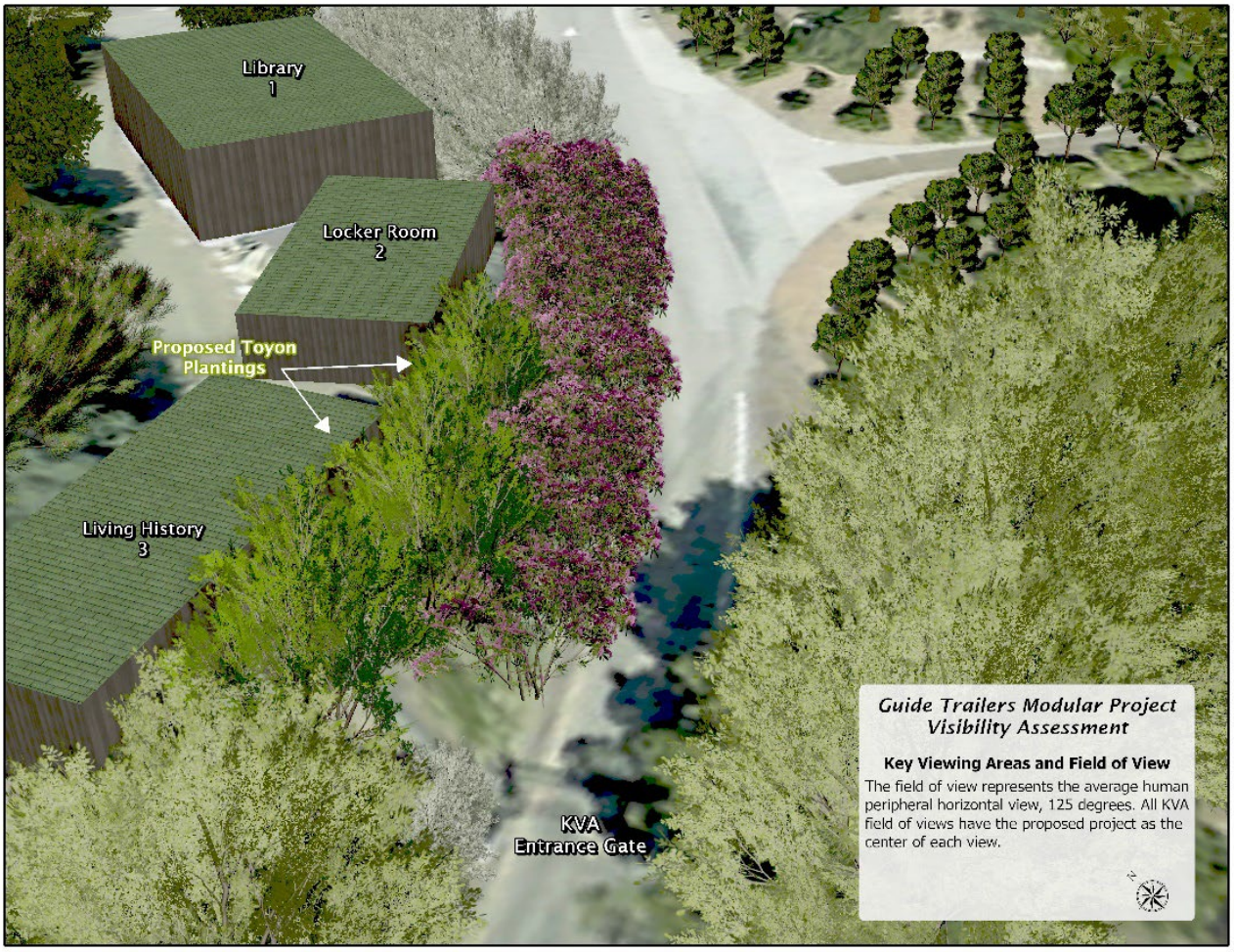
This photograph shows glimpses of the current guide trailer complex from the upper Neptune Terrace. The building covered with brown lattice is the most visible from this public viewing area. The new modular building replacing this building will be positioned slightly further back from the road to allow for Toyon trees to screen the building from public view. In addition, the new buildings will have brown-colored roofing, ensuring there is no contrast with surrounding vegetation, as seen with the current, white modular unit.

This photograph shows glimpses of the current guide trailer complex from the lower Neptune Terrace. The building covered with brown lattice is the most visible from this public viewing area. The new modular building replacing this building will be positioned slightly further back from the road to allow for Toyon trees to screen the building from public view. In addition, the new buildings will have brown-colored roofing, ensuring there is no contrast with surrounding vegetation, as seen with the current, white modular unit.

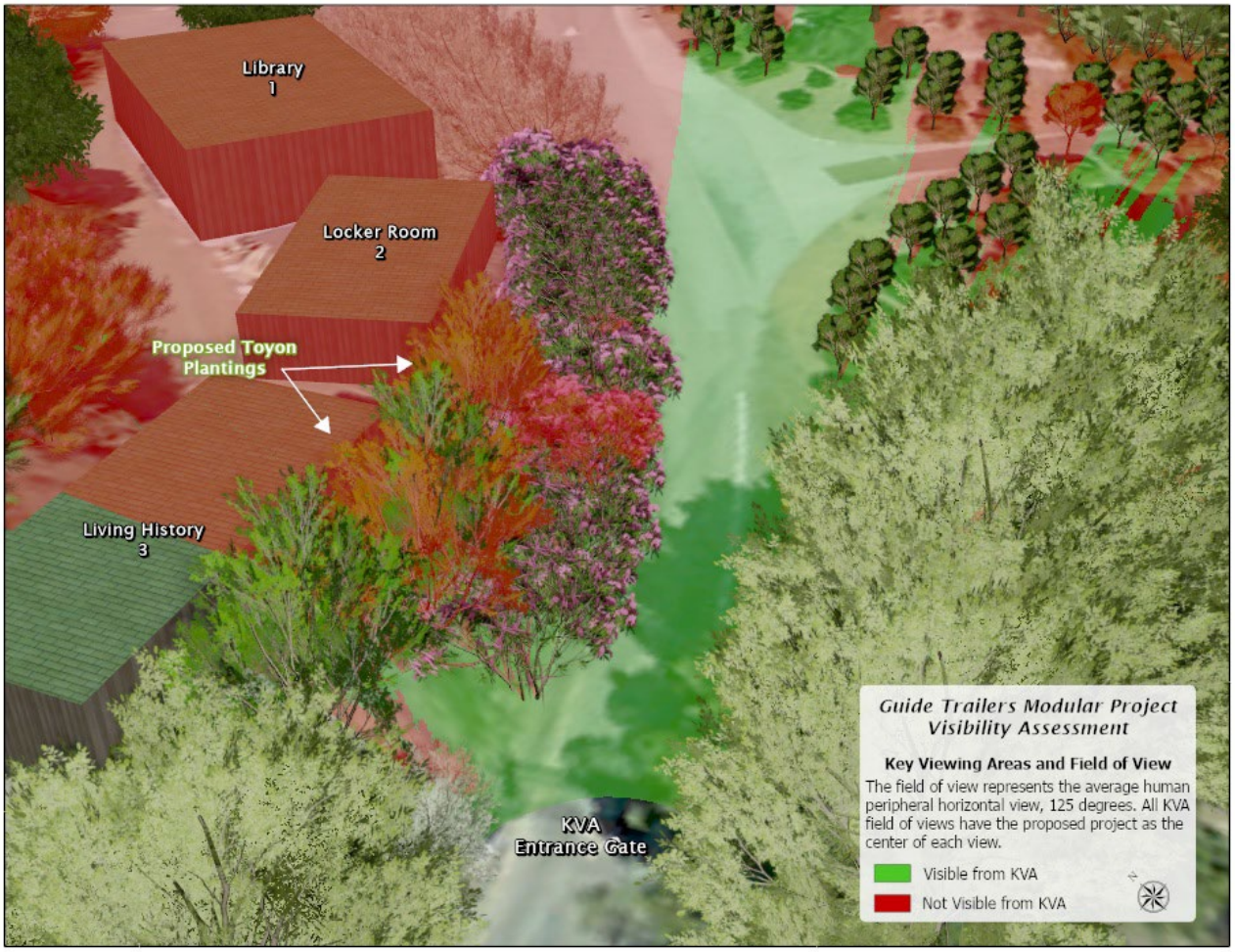
Visual Assessment:



This overview shows the proposed placement of the new modular units. Note the three Toyon plantings that will be inserted between the road and modular units, screening the units from public view.

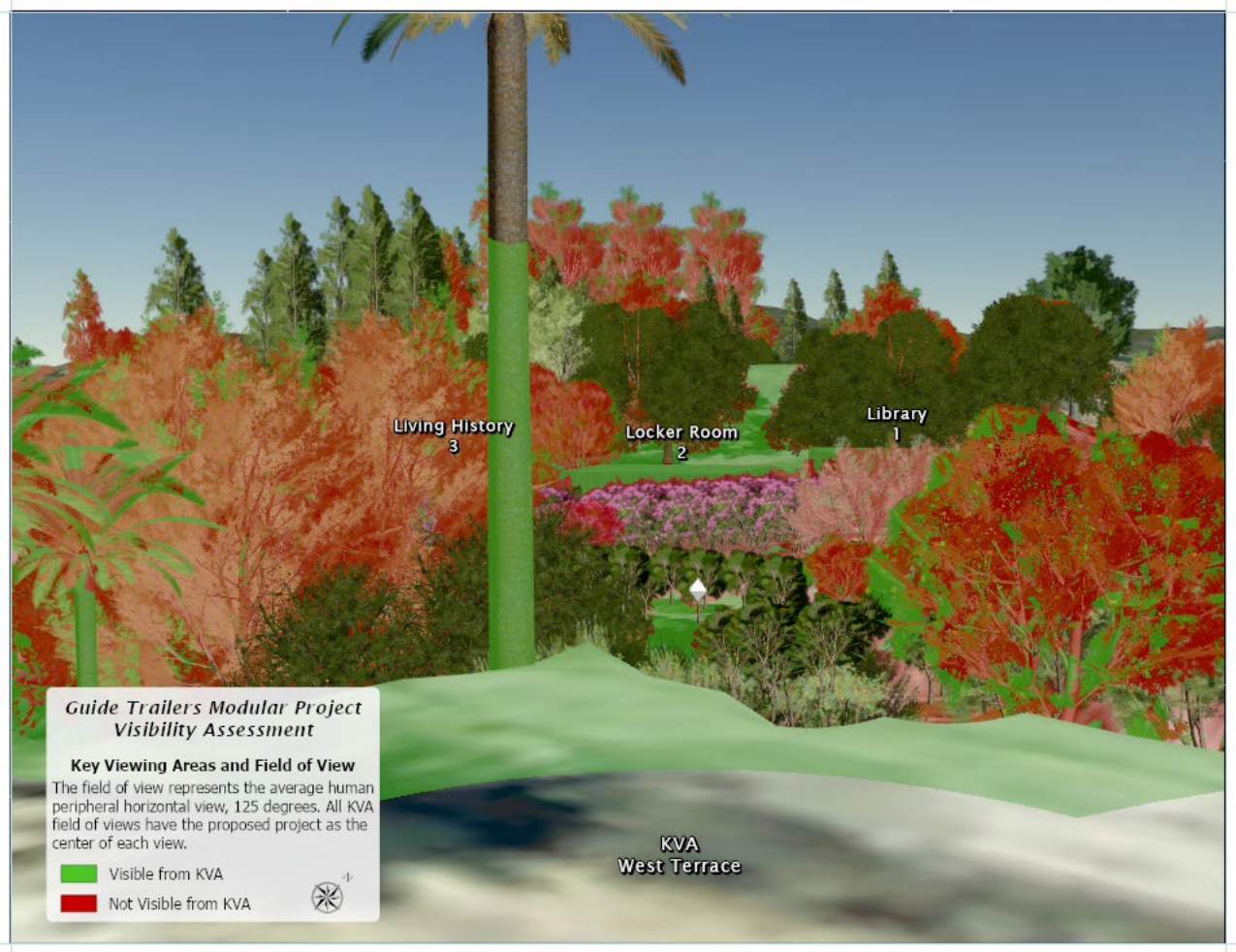


This visibility assessment from the entrance road shows the proposed locations of the new modular units, and their visibility from publicly accessible areas. Toyon plantings will largely obstruct the view of these new units from public sight.



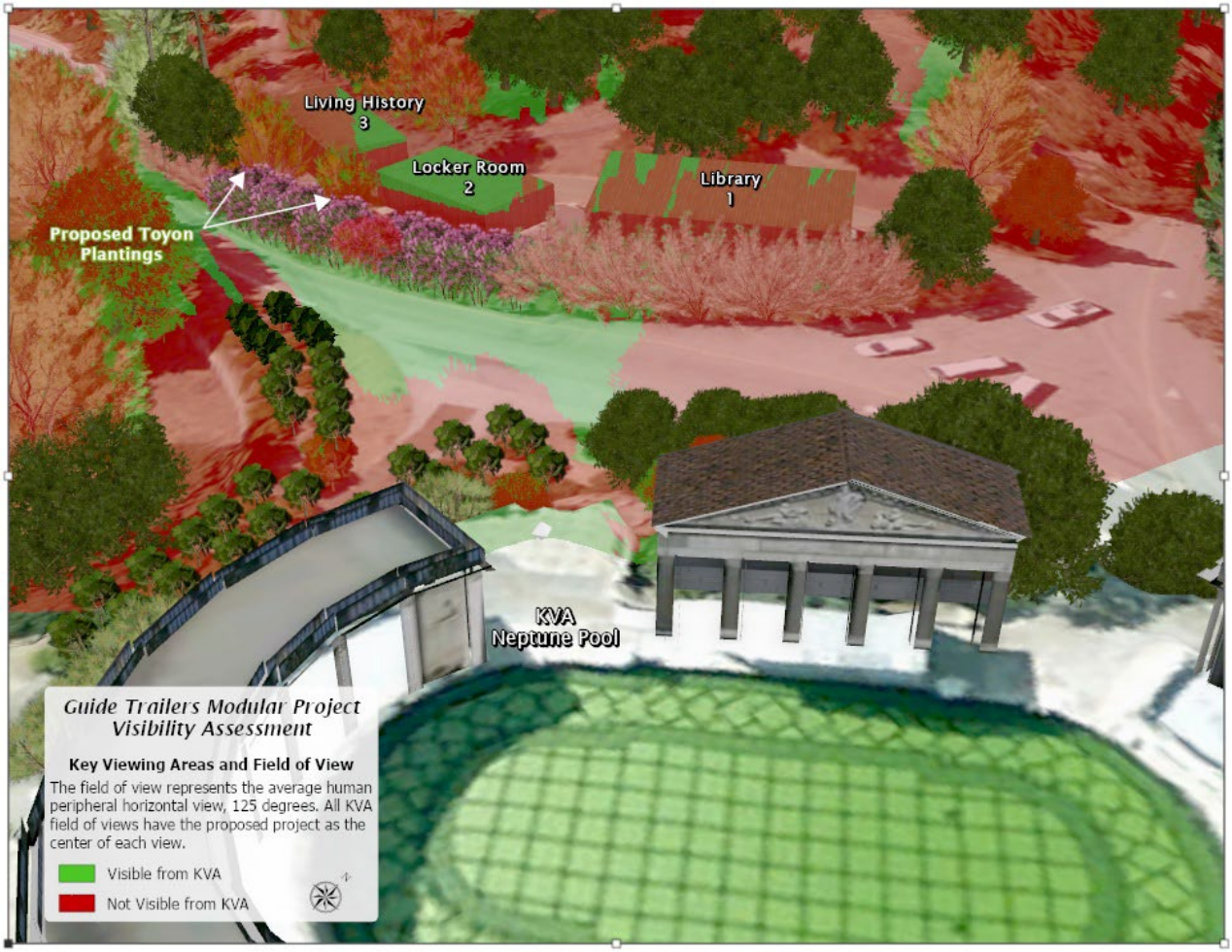
This visibility assessment from the entrance road shows the proposed locations of the new modular units, and their visibility from publicly accessible areas. Toyon plantings will largely obstruct the view of these new units from public sight.

This visibility assessment from the West Terrace shows the proposed locations of the new modular units, and their visibility from publicly accessible areas. Vegetation screening and a brown-colored roofing material will ensure the buildings blend in with the natural surroundings.



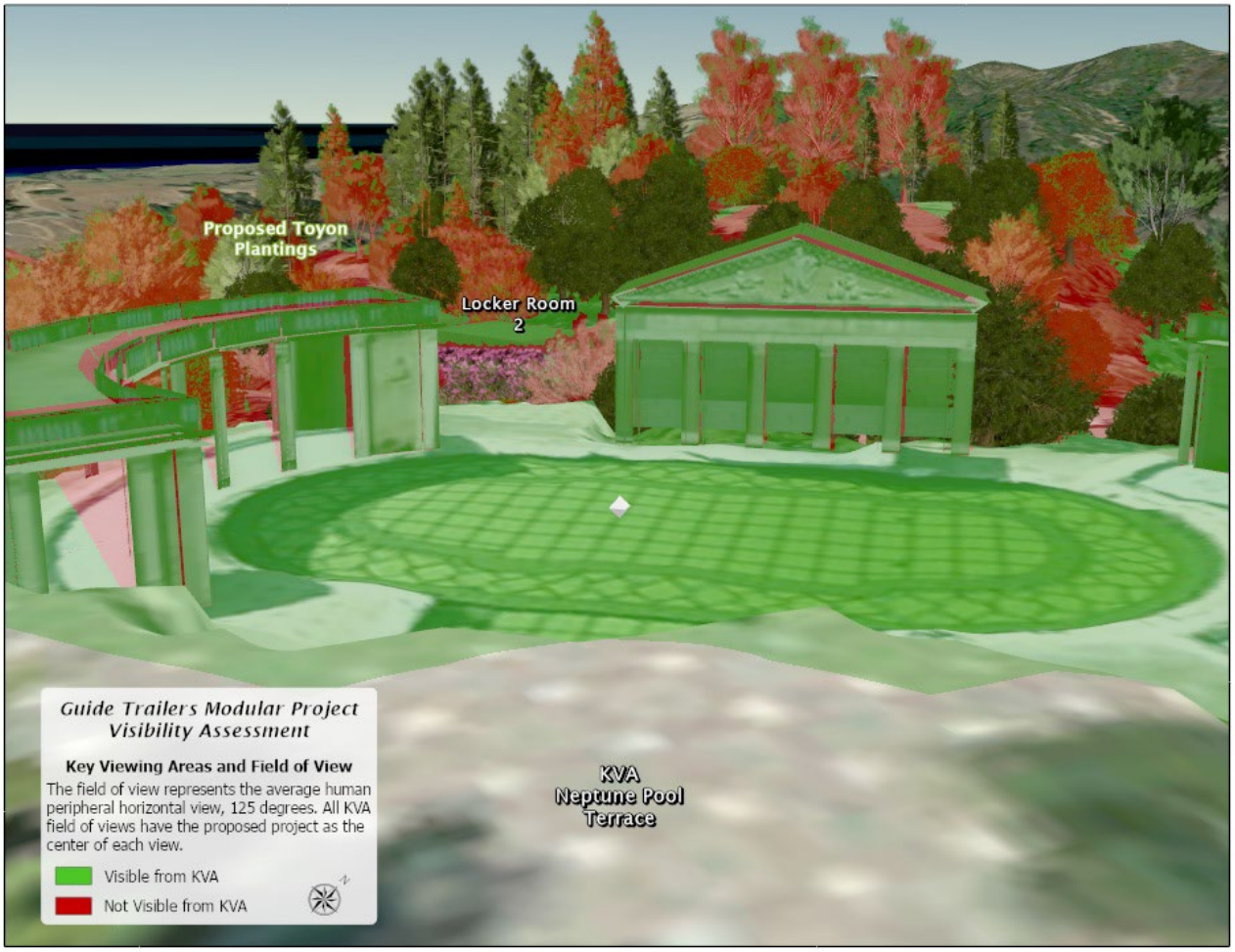
This visibility assessment from the West Terrace shows the proposed locations of the new modular units, and their visibility from publicly accessible areas. Vegetation screening and a brown-colored roofing material will ensure the buildings blend in with the natural surroundings.

This visibility assessment from the upper Neptune Terrace shows the proposed locations of the new modular units, and their visibility from publicly accessible areas. Vegetation screening and a brown-colored roofing material will ensure the buildings blend in with the natural surroundings.



This visibility assessment from the upper Neptune Terrace shows the proposed locations of the new modular units, and their visibility from publicly accessible areas. Vegetation screening and a brown-colored roofing material will ensure the buildings blend in with the natural surroundings.

This visibility assessment from the lower Neptune Terrace shows the proposed locations of the new modular units, and their visibility from publicly accessible areas. Vegetation screening and a brown-colored roofing material will ensure the buildings blend in with the natural surroundings.



This visibility assessment from the lower Neptune Terrace shows the proposed locations of the new modular units, and their visibility from publicly accessible areas. Vegetation screening and a brown-colored roofing material will ensure the buildings blend in with the natural surroundings.

APPENDIX B. SENSITIVE SPECIES LISTS

Table 1: 9-Quadrat Database Results for Plant Species at Site 1, Elephant Hill New Modulars, Site 3, Guide Complex Replacement Modulars, and Site 4, District Office Replacement Modulars

Scientific Name	Common Name	Federal Status	California State Status	CNPS	Habitat Present?	Rationale
Allium hickmanii	Hickmans onion	None	None	1B.2	No	Habitat includes coastal prairie or grassy openings in Monterey pine (*Pinus radiata*) forest or the edges of vernal pools, usually on damp clay-loam soils (but not heavy adobe), underlain by sandstone or shale. Habitat not present within project site.
Sanicula hoffmannii	Hoffmanns sanicle	None	None	4.3	No	Species found in a few locations in the coastal mountain ranges including the Scott Creek watershed in Santa Cruz County. Its habitat includes coastal hillsides and mountain slopes, sometimes with serpentine soils. Project site does not provide suitable habitat however the surrounding coastal hills may provide suitable habitat.
Cirsium occidentale var. *compactum*	compact cobwebby thistle	None	None	1B.2	No	Species is typically found in coastal habitats such as coastal dunes and coastal bluffs. Suitable coastal habitat is not present within the project site however due to the widespread horticultural planting of this species, it could potentially establish around the project site.
Erigeron sanctarum	Saints' daisy	None	None	4.2	Yes	Species grows in coastal and inland chaparral and oak woodland, and sandy coastal scrub habitat. Suitable woodland habitat occurs adjacent to the project site.

Streptanthus albidus ssp. *peramoenus*	most beautiful jewelflower	None	None	1B.2	Yes	Species found on serpentine soils in open areas such as chaparral, valley grassland, and foothill woodlands, along a narrow band of the Santa Lucia Range in Monterey and San Luis Obispo Counties. Suitable woodland habitat occurs adjacent to the project site.
Dudleya blochmaniae ssp. *blochmaniae*	Blochmans dudleya	None	None	1B.1	No	Species found in coastal sage scrub and chaparral communities along the coast where there is bare soil for the plant to establish. Suitable habitat does not occur within the project site.
Carex obispoensis	San Luis Obispo sedge	None	None	1B.2	No	Species grows in a variety of habitats, including cypress forest, chaparral, coastal scrub, and coastal prairie habitats at elevations below 600 meters where there are areas of saturated soil such as wetland seeps. Suitable habitat does not occur within the project site.
Arctostaphylos hookeri ssp. *hearstiorum*	Hearst's manzanita	None	SE	1B.2	No	Species found in coastal sage scrub, chaparral, coastal prairie, valley grassland. It tends to grow at elevations from 0-2000 feet. Species typically found in more coastal, lower elevation sites from the Hearst Castle Monument.
Arctostaphylos obispoensis	Bishop manzanita	None	None	4.3	No	Species grows in the woodlands and forests of the coastal range, usually on serpentine soil. Suitable habitat not present within project site however could be found in adjacent hillsides within the Hearst property.
Astragalus nuttallii var. *nuttallii*	ocean bluff milk-vetch	None	None	4.2	No	Species is typically found in coastal habitats such as coastal dunes and coastal bluffs. Suitable coastal habitat is not present within the project site.
Hosackia gracilis	harlequin lotus	None	None	4.2	No	Species commonly found in wetland areas within

						Northern Coastal Scrub, Closed-cone Pine Forest, Mixed Evergreen Forest, wetland-riparian. Suitable wetland areas not found within project site.
Monardella sinuata ssp. *sinuata*	southern curly-leaved monardella	None	None	1B.2	No	Species found in coastal strand, northern coastal scrub, coastal sage scrub, yellow pine forest, chaparral. Suitable habitat is not present within the project site.
Castilleja densiflora var. *obispoensis*	San Luis Obispo owls-clover	None	None	1B.2	No	Species typically found along coastal prairies and coastal terraces.
Pedicularis rigginsiae	Arroyo de la Cruz lousewort	None	None	1B.1	No	Species specifically found on shaded and moist soils along Arroyo de la Cruz north of the project site.
Abies bracteata	bristlecone fir	None	None	1B.3	No	Species found along the Santa Lucia mountain range typically on loose, gravelly soils in elevations of 700 to 5200 feet. Species not found near project site.
Pinus radiata	Monterey pine	None	None	1B.1	No	Monterey pine forest exists in nearby, lower elevational regions but does not occur around the Hearst Castle Monument.
Chorizanthe douglasii	Douglas spineflower	None	None	4.3	No	Species found on sandy to gravelly flats and slopes, mixed grassland communities, oak and pine woodlands; 1000 – 5500 feet. Species found in more southeastern regions along the La Panza Range.
Chorizanthe palmeri	Palmer's spineflower	None	None	4.2	Yes	Species found foothill woodland, chaparral, valley grassland. Potential suitable habitat may be found adjacent or near project site.
Chorizanthe pungens var. *pungens*	Monterey spineflower	FT	None	1B.2	Yes	Species typically found in coastal strand, northern coastal scrub, coastal sage scrub but can be found in closed-cone pine forest, yellow pine forest, foothill woodland, chaparral.

						Potential suitable habitat may be present near project site.
Aspidotis carlotta-halliae	Carlotta hall's lace fern	None	None	4.2	Yes	Species endemic to California, where it is found in the Central Coast Ranges and coastal hillsides, often on serpentine soils. Potential suitable habitat may be present near project site.
Delphinium parryi ssp. *blochmaniae*	dune larkspur	None	None	1B.2	No	Species found in coastal habitats including coastal strand, coastal dunes, and chaparral. Suitable habitat is not found within or near the project site.
Ceanothus hearstiorum	Hearst's ceanothus	None	SR	1B.2	No	This Ceanothus is endemic to California, where it grows wild only on the hilly coastline of San Luis Obispo County. Species not found near project site.
Ceanothus maritimus	maritime ceanothus	None	SR	1B.2	No	Species is endemic to San Luis Obispo County, California, where it is known from only a few occurrences in the vicinity of Hearst Ranch, growing on the coastal bluffs. Suitable habitat not present near project site.
Galium hardhamiae	Hardham's bedstraw	None	None	1B.3	No	Species found in the Santa Lucia Range typically in wet areas such as marshes and seeps. Suitable habitat not found near project site.
Bloomeria humilis	dwarf goldenstar	None	SR	1B.2	No	Species is endemic to San Luis Obispo County, California, where it is known from only one occurrence on the coastline near San Simeon. Occurrence is found in coastal prairie habitat. Suitable habitat not found near project site.
Triteleia ixioides ssp. *cookii*	Cook's triteleia	None	None	1B.3	No	Species typically found within wetland areas. Suitable wetland habitat is not present within the project site.

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, Bryson, Cambria, Pebblestone Shut-In, Pico Creek, Piedras Blancas, and San Simeon 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 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.

Table 2: 9-Quadrat Database Results for Plant Species at Site 2, San Simeon Creek Campground New Modulars

Scientific Name	Common Name	Federal Status	California State Status	CNPS	Habitat Present?	Rationale
Eryngium aristulatum var. *hooveri*	Hoovers button-celery	None	None	1B.1	No	Species occurs in wetland areas, typically vernal pools. Vernal pool habitat does not occur within the project site.
Perideridia gairdneri ssp. *gairdneri*	California Gairdner's yampah	None	None	4.2	No	Species occurs in freshwater wetlands, mixed evergreen forest, chaparral, valley grassland, wetland-riparian. Species typically found in more interior locations.
Sanicula hoffmannii	Hoffmann's sanicle	None	None	4.3	No	Species found in a few locations in the coastal mountain ranges. Its habitat includes coastal hillsides and mountain slopes, sometimes with serpentine soils. Project sites do not provide suitable habitat.
Baccharis plummerae ssp. *glabrata*	San Simeon baccharis	None	None	1B.2	No	Species typically found in foothill and valley grasslands. Suitable habitat does not occur within the project site
Cirsium fontinale var. obispoense	Chorro Creek bog thistle	FE	SE	1B.2	No	Species occurs in foothill woodlands, chaparral and wetland-riparian. Species

						typically found in more interior locations.
Cirsium occidentale var. *compactum*	compact cobwebby thistle	None	None	1B.2	No	Species is typically found in coastal habitats such as coastal dunes and coastal bluffs. Suitable coastal habitat is not present within the project site however due to the widespread horticultural planting of this species, it could potentially establish around the project site.
Erigeron sanctarum	Saints' daisy	None	None	4.2	No	Species grows in coastal and inland chaparral and oak woodland, and sandy coastal scrub habitat. Suitable woodland habitat occurs nearby by not within the project site.
Lasthenia californica ssp. macrantha	perennial goldfields	None	None	1B.2	No	Species usually occurs in northern coastal scrub, coastal sage scrub, northern oak woodland, foothill woodland, coastal prairie, and valley grassland. Suitable habitat does not occur within the project site.
Layia jonesii	Jones' layia	None	None	1B.2	No	Species typically found on slopes with a clay or serpentine soil substrate.
Monolopia gracilens	woodland woollythreads	None	None	1B.2	No	Species typically occurs in redwood forest, mixed evergreen forest, and chaparral. Suitable habitat does not occur within the project site.
Senecio aphanactis	chaparral ragwort	None	None	2B.2	No	Species occurs in dry coastal areas, particularly alkali flats. Suitable habitat does not occur within the project site.
Streptanthus albidus ssp. *peramoenus*	most beautiful jewelflower	None	None	1B.2	No	Species found on serpentine soils in open areas such as chaparral, valley grassland, and foothill woodlands, along a narrow band of the Santa Lucia Range in Monterey and San Luis Obispo Counties. Suitable habitat does not occur within the project site

Calystegia subacaulis ssp. *episcopalis*	Cambria morning-glory	None	None	4.2	No	Species found in northern coastal scrub and northern oak woodland. Suitable habitat does not occur within the project site.
Dudleya blochmaniae ssp. blochmaniae	Blochman's dudleya	None	None	1B.1	No	Species found in coastal sage scrub and chaparral communities along the coast where there is bare soil for the plant to establish. Suitable habitat does not occur within the project site.
Carex obispoensis	San Luis Obispo sedge	None	None	1B.2	Yes	Species grows in a variety of habitats, including cypress forest, chaparral, coastal scrub, and coastal prairie habitats at elevations below 600 meters where there are areas of saturated soil such as wetland seeps. Suitable habitat occurs within the project site.
Arctostaphylos cruzensis	Arroyo de la Cruz manzanita	None	None	1B.2	No	Species only found along Arroyo de la Cruz north of the project site on the San Simeon Coast.
Astragalus nuttallii var. *nuttallii*	ocean bluff milk-vetch	None	None	4.2	No	Species typically found along coastal strands, coastal dunes, and coastal bluffs. Suitable habitat is not present within the project site.
Hosackia gracilis	harlequin lotus	None	None	4.2	No	Species commonly found in wetland areas within Northern Coastal Scrub, Closed-cone Pine Forest, Mixed Evergreen Forest, wetland-riparian. Suitable wetland areas not found within project site.
Malacothamnus palmeri var. *palmeri*	Santa Lucia bush-mallow	None	None	1B.2	No	Species found in the chaparral and woodland of the Central Coast and adjacent Coast Ranges of Monterey and San Luis Obispo Counties. Suitable habitat does not occur within the project site.
Castilleja densiflora var. *obispoensis*	San Luis Obispo owls-clover	None	None	1B.2	No	Species typically found along coastal prairies and coastal terraces.

Pinus radiata	Monterey pine	None	None	1B.1	Yes	Monterey pine forest exists in nearby but not directly within the project site
Delphinium parryi ssp. *eastwoodiae*	Eastwood's larkspur	None	None	1B.2	No	Species known to occur on slopes with chaparral vegetation around San Luis Obispo. Project site is outside of species known range.
Horkelia cuneata var. *puberula*	mesa horkelia	None	None	1B.1	No	Species found in coastal communities including coastal strand, northern coastal scrub, coastal sage scrub, closed-cone pine forest, foothill woodland, chaparral.
Horkelia cuneata var. *sericea*	Kellogg's horkelia	None	None	1B.1	No	Species prefers a sandy and gravelly substrate over richer soils, and grows on coastal dunes, chaparral, and coniferous forests.
Galium californicum ssp. *luciense*	Cone Peak bedstraw	None	None	1B.3	No	Species typically found in yellow pine forest, mixed evergreen forest, and foothill woodland. Suitable habitat is not present within the project site.

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 Cambria, Cayucos, Cayucos OE W, Cypress Mountain, Lime Mountain, Pebblestone Shut-In, Pico Creek, and San Simeon USGS 7.5-minute quadrangles.

Legend
Federal Status
FE Endangered. Species in danger of extinction throughout all or a significant portion of its range.
PE Proposed Endangered.
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SSC CDFW species of special concern.
WL CDFW Watch List.

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1B.2 Plants fairly endangered in California and elsewhere.
1B.3 Rare, threatened, or endangered in California and elsewhere.
4.2 Limited distribution.

Table 3: 9-Quadrat Database Results for Wildlife Species at Site 1, Elephant Hill New Modulars, Site 3, Guide Complex Replacement Modulars, and Site 4, District Office Replacement Modulars

Scientific Name	Common Name	Federal Status	California State Status	CNPS	Habitat Present?	Rationale
Amphibians						
Rana boylii	foothill yellow-legged frog	PE	SE	-	No	Species is closely associated with streams within valley-foothill hardwood, valley-foothill hardwood-conifer, valley-foothill riparian, ponderosa pine, mixed conifer, mixed chaparral and wet meadows and is rarely observed far from the water's edge. Breeding stream habitat is typically shallow, rocky and at least partially exposed to direct sunlight. Suitable riparian habitat is not present within the project site.
Rana draytonii	California red-legged frog	FT	SSC	-	Yes	Species spends the bulk of its life in or near water sources like streams or stock ponds, which the species uses for breeding. The frog moves into neighboring upland areas to feed and shelter when stream flow levels are high. No suitable breeding habitat is present near the project site. However, suitable aquatic habitat is within dispersal distance of the project site.
Taricha torosa	Coast Range newt	None	SSC	-	Yes	Species found in coastal areas and coastal range mountains in oak forests, woodlands, or rolling grasslands. In the terrestrial phase they live in moist to dry habitats under woody or leafy debris, in rock crevices, or in animal burrows. In the aquatic phase they are found in ponds, reservoirs, lakes and slow-moving streams. Species may be found in adjacent oak woodlands.
Birds						
Buteo regalis	ferruginous hawk	None	WL	-	No	Species preferred habitat includes lowlands, plateaus, plains, valleys, agricultural land rolling hills of grass land,

						ranches, and the desert edges. Project location does not provide suitable lowland habitat.
Charadrius nivosus nivosus	western snowy plover	FT	SSC	-	No	Species breeds primarily along coast beaches from southern Washington to southern Baja California. They forage for small invertebrates on sandy beaches, river gravel bars and similar habitats. Suitable coastal beach habitat is not present within the project site.
Pelecanus occidentalis californicus	California brown pelican	Delisted	FP	-	No	Species is an aquatic bird that is typically found on rocky, sandy or vegetated offshore islands, beaches, open sea (for feeding), harbors, marinas, estuaries, and breakwaters. Project site does not provide marine aquatic habitat.
Fish						
Eucyclogobius newberryi	tidewater goby	FE	None	-	No	Species inhabits lagoons, estuaries, marshes and freshwater tributaries. These habitats have shallow, still, but not stagnant, water. These habitats are freshwater or brackish water, a varying mixture of fresh and saltwater, much of the year. Estuarine habitat is not present within the project site.
Oncorhynchus mykiss	South-Central California Coast steelhead	FT	None	-	No	Species is an anadromous fish that spawns in coastal rivers and streams where upstream pooling habitat with still waters. Closest stream that could potentially provide spawning habitat is 0.5 miles from project site.
Invertebrates						
Danaus plexippus plexippus	monarch butterfly	C	None	-	Yes	During seasonal migration, the species overwinters along the coast of California in areas that provide suitable microclimates, shielding it from cold temperatures and strong winds. Species is typically found overwintering in coastal forests on conifers such as pines and cypress or in eucalyptus groves. Species may be found overwintering in pine stands

						around the Hearst Castle monument.
Mammals						
Enhydra lutris nereis	southern sea otter	FT	FP	-	No	Species is found in nearshore areas along the central California coastline, including areas of high human activity, like harbors. Species typically inhabits areas with abundant seagrass such as sea kelp or eel grass forests.
Antrozous pallidus	pallid bat	None	SSC	-	Yes	Species often found in mountainous or rocky areas near water. They are also found over open, sparsely vegetated grasslands. During the day time, pallid bats typically roost in cracks and crevices, which may include tile roofs, exfoliating bark of trees, or rocky outcrops. Species has been observed roosting in man-made structures around the Hearst Castle monument.
Corynorhinus townsendii	Townsends big-eared bat	None	SSC	-	Yes	Species will use a variety of habitats, almost always near caves or other roosting areas. They can be found in pine forests and arid desert scrub habitats. When roosting they do not tuck themselves into cracks and crevices like many bat species do, but prefer large open areas. Species has been observed roosting in man-made structures around the Hearst Castle monument.
Myotis evotis	long-eared myotis	None	None	-	Yes	Species found in wide range of habitats, but is most commonly found in mixed coniferous forests, from humid coastal areas to montane forests. Elevation ranges from sea level on the Pacific Coast to 2,830 meters in the mountains. Suitable habitat is found adjacent to project site.
Myotis thysanodes	fringed myotis	None	None	-	Yes	Species mostly found in dry habitats where open areas (e.g., grasslands and deserts) are interspersed with mature forests (usually ponderosa pine, pinyon-juniper, or oak), creating

						complex mosaics with ample edges and abundant snags. The most common habitats oak, pinyon, and juniper woodlands or ponderosa pine forest at middle elevation. Habitat present adjacent to project site. Species has been observed around Hearst Castle Monument.
Myotis volans	long-legged myotis	None	None	-	Yes	Species most commonly found at elevations from 2000 to 3000 m in coniferous forests. They are occasionally found in riparian or desert habitats, trading tree roosts for abandoned buildings and caves. Habitat present adjacent to project site. Species been observed around Hearst Castle Monument.
Myotis yumanensis	Yuma myotis	None	None	-	Yes	Species found in a variety of western lowland habitats, from arid thorn scrub to coniferous forest, but always close to standing water such as lakes and ponds. When not close to a body of water, the Yuma Myotis can be found in the thousands roosting in caves, attics, buildings, mines, underneath bridges, and other similar structures. Species been observed around Hearst Castle Monument.
Reptiles						
Emys marmorata	southwestern pond turtle	None	SSC	-	Yes	Species can be found in a variety of fresh water sources, including lakes, ponds, rivers, streams, creeks, reservoirs, marshes, and irrigation ditches. The species also relies on suitable terrestrial habitat to search for food, a better place to live, a mate, or to lay their eggs in the spring. Species has been found to migrate over half a mile in a yearly cycle. This species has been observed in Arroyo del Puerto Creek by State Parks staff.
Thamnophis hammondii	two-striped garter snake	None	SSC	-	Yes	Species is a primarily aquatic snake that inhabits streams and

						ponds in chaparral, oak woodland, and forest habitats up to 8,000 feet elevation. Its ideal habitat is in aquatic areas that are bordered by riparian vegetation with open spaces for basking. Suitable aquatic habitat is not found within the project site, however, the project site is within dispersal distance of Arroyo del Puerto where this species has been found.

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, Bryson, Cambria, Pebblestone Shut-In, Pico Creek, Piedras Blancas, and San Simeon 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 CDFW species of special concern.
WL CDFW Watch List.

Table 4: 9-Quadrat Database Results for Wildlife Species at Site 2, San Simeon Creek Campground New Modulars

Scientific Name	Common Name	Federal Status	CA State Status	CNPS Status	Habitat Present?	Rationale
Amphibians						
Batrachoseps incognitus	San Simeon slender salamander	None	None	-	Yes	Species typically Inhabits open and closed forests of yellow pine, laurel, sycamore, and oak woodland. Species occurs within the park and suitable habitat occurs around the project site.
Rana boylii	foothill yellow-legged frog	PE	SE	-	No	Species is closely associated with streams within valley-foothill hardwood, valley-foothill hardwood-conifer, valley-foothill riparian, ponderosa pine, mixed conifer, mixed chaparral and wet meadows and is rarely observed far from the water's edge. Breeding stream habitat is typically shallow, rocky and at least partially exposed to direct sunlight. Suitable riparian habitat may be present adjacent to project site along San

						Simeon Creek however species is typically found at higher elevations
Rana draytonii	California red-legged frog	FT	SSC	-	Yes	Species spends the bulk of its life in or near water sources like streams or stock ponds, which the species uses for breeding. The frog moves into neighboring upland areas to feed and shelter when stream flow levels are high. Suitable breeding habitat is not present near the project site; however, suitable aquatic habitat is within dispersal distance of the project site.
Taricha torosa	Coast Range newt	None	SSC	-	Yes	Species found in coastal areas and coastal range mountains in oak forests, woodlands, or rolling grasslands. In the terrestrial phase they live in moist to dry habitats under woody or leafy debris, in rock crevices, or in animal burrows. In the aquatic phase they are found in ponds, reservoirs, lakes and slow-moving streams. Species may be found in adjacent grasslands and woodlands.
Birds						
Elanus leucurus	white-tailed kite	None	FP	-	No	Species commonly found in savannas, open woodlands, marshes, desert grasslands, partially cleared lands, and cultivated fields. Suitable habitat does not occur within the project site.
Ardea alba	great egret	None	None	-	Yes	Species found in fresh and saltwater wetlands and wooded swamps. Species may use San Simeon Creek as habitat.
Charadrius nivosus nivosus	western snowy plover	FT	SSC	-	Yes	Species breeds primarily along coast beaches from southern Washington to southern Baja California. They forage for small invertebrates on sandy beaches, river gravel bars and similar habitats. Suitable coastal beach habitat is located adjacent to the project site.
Gavia immer	common loon	None	None	-	No	Species found in coastal waters along California's coast. Coastal waters are not located within the project sites.
Larus californicus	California gull	None	WL	-	Yes	Species breeding habitat includes lakes and marshes. During the winter they are found along the seacoasts, estuaries, bays, mudflats, near rivers, around farms and plowed fields, and even garbage dumps.
Thalasseus elegans	elegant tern	None	WL	-	No	Coast, bays, beaches. Generally on ocean, close to shore over shallow waters, concentrating around bays and estuaries. Sometimes far out to sea. Extremely rare on fresh waters inland.

						Nests on sandy or rocky islands. Species may occur around San Simeon Beach but not within the Project sites.
Ammodramus savannarum	grasshopper sparrow	None	SSC	-	No	Species occurs in grasslands, prairies, hayfields, and open pastures with little to no scrub cover and often with some bare ground. Suitable habitat does not occur within the project site.
Pelecanus occidentalis californicus	California brown pelican	Delisted	FP	-	Yes	Species is an aquatic bird that is typically found on rocky, sandy or vegetated offshore islands, beaches, open sea (for feeding), harbors, marinas, estuaries, and breakwaters. Marine aquatic habitat is found adjacent to the project site.
Nannopterum auritum	double-crested cormorant	None	WL	-	Yes	Species occurs near rivers and lakes as well as in coastal areas.
Fish						
Eucyclogobius newberryi	tidewater goby	FE	None	-	Yes	Species inhabits lagoons, estuaries, marshes and freshwater tributaries. These habitats have shallow, still, but not stagnant, water. These habitats are freshwater or brackish water, a varying mixture of fresh and saltwater, much of the year. Estuarine habitat is present at San Simeon Creek during high tide events.
Oncorhynchus mykiss	South-Central California Coast steelhead	FT	None	-	Yes	Species is an anadromous fish that spawns in coastal rivers and streams where upstream pooling habitat with still waters. San Simeon Creek provides suitable habitat for species.
Invertebrates						
Bombus caliginosus	obscure bumble bee	None	None	-	Yes	Species known to occur on a variety of habitats along the Pacific Coast including woodland riparian and grassland found within and adjacent to the project site. Species has been observed within Hearst San Simeon State Park.
Danaus plexippus plexippus	monarch butterfly	C	None	-	No	During seasonal migration, the species overwinters along the coast of California in areas that provide suitable microclimates, shielding it from cold temperatures and strong winds. Species is typically found overwintering in coastal forests on conifers such as pines and cypress or in eucalyptus groves. Species does not occur near project site but has been documented overwintering in nearby Monterey pine and eucalyptus stands.

Haliotis cracherodii	black abalone	FE	None	-	No	Species inhabits marine aquatic ecosystems.
Haliotis kamtschatkana	pinto abalone	None	None	-	No	Species inhabits marine aquatic ecosystems.
Mammals						
Enhydra lutris nereis	southern sea otter	FT	FP	-	No	Species is found in nearshore areas along the central California coastline, including areas of high human activity, like harbors. Species typically inhabits areas with abundant seagrass such as sea kelp or eel grass forests.
Myotis thysanodes	fringed myotis	None	None	-	No	Species mostly found in dry habitats where open areas (e.g., grasslands and deserts) are interspersed with mature forests (usually ponderosa pine, pinyon-juniper, or oak), creating complex mosaics with ample edges and abundant snags. The most common habitats oak, pinyon, and juniper woodlands or ponderosa pine forest at middle elevation. Habitat present adjacent to project site. Suitable habitat does not occur within project site.
Myotis yumanensis	Yuma myotis	None	None	-	No	Species found in a variety of western lowland habitats, from arid thorn scrub to coniferous forest, but always close to standing water such as lakes and ponds. When not close to a body of water, the Yuma Myotis can be found in the thousands roosting in caves, attics, buildings, mines, underneath bridges, and other similar structures. Species typically not known to occur or roost directly next to the coast.
Reptiles						
Emys marmorata	southwestern pond turtle	None	SSC	-	Yes	Species can be found in a variety of fresh water sources, including lakes, ponds, rivers, streams, creeks, reservoirs, marshes, and irrigation ditches. The species also relies on suitable terrestrial habitat to search for food, a better place to live, a mate, or to lay their eggs in the spring. Species has been found to migrate over half a mile in a yearly cycle. this species has been observed in San Simeon Creek by State Parks staff.
Thamnophis hammondii	two-striped gartersnake	None	SSC	-	Yes	Species is a primarily aquatic snake that inhabits streams and ponds in chaparral, oak woodland, and forest habitats up to 8,000 feet elevation. This species has been observed in San Simeon Creek by State Parks staff.

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 Cambria, Cayucos, Cayucos OE W, Cypress Mountain, Lime Mountain, Pebblestone Shut-In, Pico Creek, and San Simeon USGS 7.5-minute quadrangles.

Legend

Federal Status

FE Endangered. Species in danger of extinction throughout all or a significant portion of its range.
PE Proposed Endangered.
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 CDFW species of special concern.
WL CDFW Watch List.

APPENDIX C. ARCHAEOLOGICAL MONITORING REPORTS FOR

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Elephant Hill Electrical Modular Project 2022
Cultural Resources Monitoring Logs

Date: 08/23/22

CDPR Staff and Archaeological Monitor: Amy Hart Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Leo Tidwell Construction LTech

Area Monitored and depth of excavation: Construction at Elephant Hill in the vicinity of the former octagonal zoo with elephant enclosure and other carnivorous animals. The structures were demolished following the 1958 transfer of Hearst Castle to the state of California.

Potholing for utilities and trenching for electrical to depths of 40" occurred and some historic material from the zoo were encountered.

Observations: The soil is a highly disturbed mix of fill, native rocky soil and rock. A trash pile was encountered along the northern part of the project area just north of the Cedar tree during trenching for electrical. Trash consisted of metal, ceramic, wiring, corrugated sheets, and plastic appeared to be from Hearst-era. All material was no longer in-situ and no intact or significant archaeological features or artifacts were found or observed.

PRIOR WORK AT SITE 1 AND 2

Trenching in the SE corner where the concrete enclosure rubble was unearthed 8/24/23.

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Elephant Hill Electrical Modular Project 2022
Cultural Resources Monitoring Logs

Date: 08/24/22

CDPR Staff and Archaeological Monitor: Amy Hart Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Leo Tidwell Construction LTech

Area Monitored and depth of excavation: Construction at Elephant Hill at former octagonal animal enclosure for the Hearst-era zoo.

Trenching for electrical to depths of 40" encountered historic concrete from the enclosures.

Observations: The soil is a highly disturbed mix of fill, native rocky soil and rock. Concrete rubble was encountered during trenching in the southwest corner of the project area where a pocket of building material was encountered buried from past demolition. Some of the concrete appeared to be the demolished remnants of the elephant and/or carnivorous animal enclosures. All material encountered was no longer in-situ and no intact or significant artifacts were observed.

Concrete rubble from the animal enclosures from Hearst-era zoo at Elephant Hill, showing double rebar cages. The concrete was buried at 24-36" below the surface.

Archaeological monitoring of trenching for electrical utilities on 8/24/23.

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Elephant Hill Electrical Modular Project 2022
Cultural Resources Monitoring Logs

Date: 08/25/22

CDPR Staff and Archaeological Monitor: Amy Hart and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Leo Tidwell Construction LTech

Area Monitored and depth of excavation: Trenching for electrical to depths of 40".

Observations: The soil is a highly disturbed mix of fill, native rocky soil and rock. No intact or significant archaeological features or artifacts were found or observed.

Pile of unearthed historic animal enclosure concrete placed off to the side for inspection. The material was found on 8/24/23 and set aside on 8/25/23.

Example of wire meshing and concrete features uncovered during trenching 8/25/23.

Exposure of metal unearthed north of the Cedar tree on 8/23/23

E.2. Archaeological Monitoring Reports for Site 2 San Simeon Campground

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 09/22/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Ajay Construction (Shawn, Nate, Frank)

Area Monitored and depth of excavation: Potholing for utilities and grading of site. Monitoring occurred for all grading and excavations.

Observations: The soil is a highly disturbed mix of fill and rock. Existing utilities are present where potholing was conducted. Asphalt, gravel and historic trash present in soils during grading.

Archaeological monitoring of grading within modular footprint on 9/22/22.

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 10/06/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Ajay Construction (Shawn, Nate, Jake)

Area Monitored and depth of excavation: Start of potholing for utilities and some trenching near fire hydrant within Modular site to 3' deep.

Observations: The soil is a highly disturbed mix of fill and rock. Underlying surface is a mixed layer of fill soil composed of old asphalt, concrete, light brown soil, sand and rock down to a depth of 3'. Existing old utilities are present. No Native American resources were observed.

Archaeological monitoring of trenching on 10/06/22.

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 10/13/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Ajay Construction (Shawn, Nate, Jake)

Area Monitored and depth of excavation: Trenching for installation of water and sewer lines within Modular footprint for 40' to depths of 5'.

Observations: The soil is a highly disturbed mix of fill and rock. Underlying surface is a mixed layer of fill soil composed of old asphalt, concrete, light brown soil, sand and rock down to a depth of 3'. Existing old utilities are present. No Native American resources were observed. Some historic material from the homestead site and agriculture activities at the location.

Archaeological monitoring of trenching showing sterile soil with disturbed upper 3' and no midden or archaeological deposits on 10/13/22.

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 10/12/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Ajay Construction (Shawn, Nate, Jake)

Area Monitored and depth of excavation: Trenching within Modular site to 5' deep.

Observations: Road base present below asphalt for 6". Underlying road base is a mixed layer of fill soil composed of old asphalt, concrete, light brown soil, sand and rock down to a depth of 3'. From 3-5' is a sterile dark brown clay loam. Historic material is present in the trench from depths of 1-4' of bricks, metal, and rock. Existing old utilities are present. No Native American resources were observed.

Historic trash (ceramic, glass, metal) found during trenching on 12/21/23.

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 10/18/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Ajay Construction (Shawn, Nate, Jake)

Area Monitored and depth of excavation: Trenching for installation of water and sewer lines within Modular footprint for 40' to depths of 5'. Monitoring occurred for all excavations.

Observations: The soil is a highly disturbed mix of fill and rock. Underlying surface is a mixed layer of fill soil composed of old asphalt, concrete, light brown soil, sand and rock down to a depth of 3'. Native soil is present from 3'-5' and below consisting of a dark brown to black clay soil. Existing old utilities are present to depths of 3.5'. No Native American resources were observed within the spoils, trench or bucket. Some historic material from the homestead site and agriculture activities at the location. One fragment of abalone was observed in the spoils pile, but it could not be determined if it was a precolonial marine shell from CA-SLO-187 or from the historic homestead.

Archaeological monitoring of trenching showing abalone fragment on 10/18/22.

Archaeological monitoring of trenching within modular footprint on 10/28/22.

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 12/21/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: Joseph Lathrop YTT Northern Chumash

Construction Crew: Ajay Construction (Shawn, Nate, Jake)

Area Monitored and depth of excavation: PGE trench from modular site west for 60' x 3.5' deep. Backfilled with native and sand.

Observations: Road base present below asphalt for 6". Underlying road base is a mixed layer of soil with historic debris from 6"-18" below the surface. Historic debris consisted of metal, glass, ceramic, abalone and Pismo clam shell fragments, and ungulate bones (cow and pig). No Native American resources were observed. Some intact native soils below 30" were observed as sterile dark brown to black clay.

Historic trash (ceramic, glass, metal) found during trenching on 12/21/23.

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 12/22/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: Joseph Lathrop YTT Northern Chumash

Construction Crew: Ajay Construction (Shawn, Nate, Jake, Eric)

Area Monitored and depth of excavation: PGE trench from modular site west for 40' x 3.5' deep to 5'. Backfilled with native and sand. Lateral trench 10' to connect CDPR staff house.

Observations: Road base present below asphalt for 6". Underlying road base is a mixed layer of soil with historic debris from 6"-18" below the surface. Historic debris consisted of metal, glass, ceramic, abalone and Pismo clam shell fragments, and ungulate bones (cow and pig).

At 1000 hrs Joseph found a faunal bone. Upon inspection Chad determined it was a pig bone. One large vertebrae and scapula was then unearthed followed by a tusk fragment. The area was at the junction of the lateral tie in to the CDPR staff housing which went through the fence. The main trench continued towards the PGE boxes 60' further NW. At 1530 hrs more bones were uncovered. Chad determined them to also be faunal and likely pig from the historic homestead occupation dating to late 1890s and early 1900. No delay of construction occurred throughout the day due to monitoring but Shawn the operator became vocal and irritated about the monitoring delaying his guys. The inspector confirmed no unnecessary delays occurred and the operator was instructed to refrain from vulgar language and complaints about archaeological and tribal monitoring. Overall, no precolonial archaeological or Native American resources were observed. Some intact native soils below 30" were observed as sterile dark brown to black clay.

Historic domesticated pig bones and saw cut bones found in trench on 12/22/23

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 12/28/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: Joseph Lathrop YTT Northern Chumash

Construction Crew: Ajay Construction (Shawn, Nate, Jake, Eric)

Area Monitored and depth of excavation: PGE trench from modular site west for 60' x 3.5' deep to 5'. Backfilled with native and sand.

Observations: Road base present below asphalt for 6". Underlying road base is a mixed layer of soil with historic debris from 6"-18" below the surface. Historic debris consisted of metal, glass, ceramic, abalone and Pismo clam shell fragments, and ungulate bones (cow and pig).

At 1200 hours a deposit of cobbles was unearthed ~15' from the terminus of the asphalt and PGE boxes. The cobbles were not prehistoric and may have been placed during past construction or during historic times.

At 1500 hrs Joseph found a broken sandstone prehistoric bowl mortar placed above and existing pipe that was unearthed at the terminus of the excavated trench where the asphalt ends and the PGE boxes are located. Upon inspection Chad determined it was previously disturbed and was placed in the fill during previous construction. Other chert and red rocks were present. The bowl fragment was placed to the side. Construction crew was friendly and cooperative. No other Native American resources were observed and it was determined the bowl mortar had been placed in the soil by previous excavations likely for the existing utilities, the road and/or grading for the building which is several feet immediately east. No midden, and no intact or previously disturbed precolonial archaeological deposits were observed.

Broken sandstone bowl found in previously disturbed soils. 12/23/22

State of California • Natural Resources Agency
Gavin Newsom, *Governor*
DEPARTMENT OF PARKS AND RECREATION
Armando Quintero, *Director*
San Luis Obispo Coast District
750 Hearst Castle Road
San Simeon, CA 93452
805/ 927-2065
805/ 927-2031 FAX
dan.falat@parks.ca.gov

San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 12/28/22

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: Kelsey Shaffer YTT Northern Chumash

Construction Crew: Ajay Construction (Shawn, Nate, Jake, Eric)

Area Monitored and depth of excavation: PGE trench end of asphalt around the existing PGE boxes and a 25' segment of trench diagonal off previously excavated and backfilled trench. Backfilled with native and sand.

Observations: Mix of previously disturbed native soil and existing trench lines backfilled with sand. Mixed native soil contained several large abalone fragments, one large complete Pismo Clam, one saw cut abalone piece, ceramic, metal and some rocks. All of the material was from the historic homestead site. No Native American resources observed.

The 25' trench contained the same as previous trench soil profiles: road base present below asphalt for 6". Underlying road base is a mixed layer of soil with historic debris from 6"-18" below the surface. Historic debris consisted of metal, glass, ceramic, abalone and Pismo clam shell fragments, and ungulate bones (cow and pig).

Excavations for electrical utilities showing previously disturbed area at the tie in location to the PGE box. 12/28/23.

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San Simeon Modular Project 2022
Cultural Resources Monitoring Logs

Date: 1/27/23

CDPR Staff and Archaeological Monitor: Chad Jackson and Larry Cassidy (4Leaf)

Tribal Monitor: None

Construction Crew: Ajay Construction (Shawn, Nate, Jake, Eric)

Area Monitored and depth of excavation: Hand digging for bollards around utilities in modular footprint and PGE trench end of asphalt around the existing PGE boxes for small tie in of phone line for 8' of previously excavated trench.

Observations: Mix of previously disturbed native soil and existing trench lines backfilled with sand. No Native American resources observed.

Excavations for bolllards in modular footprint previously disturbed area 1/27/23.

APPENDIX D. TRIBAL CULTURAL RESOURCES

D.1. NAHC Sacred Lands File Search and Native American Contact List

STATE OF CALIFORNIA — Gavin Newsom, *Governor*

NATIVE AMERICAN HERITAGE COMMISSION

March 17, 2023

Chad Jackson
California Department of Parks and Recreation

Via Email to: chad.jackson@parks.ca.gov

Re: San Simeon Modular Project, San Luis Obispo County

Dear Mr. Jackson:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Northern Chumash Tribal Council and the Salinan Tribe of Monterey, San Luis Obispo Counties on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Cody.Campagne@nahc.ca.gov.

Sincerely,

Cody Campagne

Cody Campagne
Cultural Resources Analyst

Attachment

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Page 1 of 1

From: info@salinantribe.com
To: Jackson, Chad@Parks
Subject: Re: San Simeon Modular Project
Date: Monday, March 20, 2023 3:07:26 PM

Greetings Chad, as you know the record search for sacred sites came back positive for this project. This is because San Simeon point is a recorded Salinan sacred site along with the San Simeon Campground because of the village site and burial ground there. Please let us know if any unknown cultural resources are unearthed during the project.

Xayatspanikan,
Patti Dunton, Tribal Administrator

On 2023-03-08 12:47, Jackson, Chad@Parks wrote:
> Hi Patti and tribe,
>
> Attached is letter describing a project undertaking by the SLO Coast
> District of State Parks. The project will be to install modular
> buildings at four locations: three at Hearst Castle and one at San
> Simeon Campground. Let me know if you have any questions.
>
> Thank you,
>
> Chad
>
> _Chad Kaimanu Jackson_
>
> District Archaeologist/Tribal Liaison
>
> San Luis Obispo Coast District
>
> California Department of Parks and Recreation
>
> Work Cell: (805) 458-5486
>
> Personal Cell: (805) 748-5898
>
> Chad.Jackson@parks.ca.gov

From: Jackson, Chad@Parks
To: Violet Sage Walker
Subject: Re: San Simeon Modular Project
Date: Friday, March 17, 2023 4:07:24 PM
Attachments: San Simeon Modulars NCTC.pdf

Hi Violet,

I'm just following on the sacred lands file search if you have any information to share. The proposed project will take place in the four locations, three of them at Hearst Castle and one at San Simeon Campground.

Thank you,
Chad

Chad Kaimanu Jackson
District Archaeologist/Tribal Liaison
San Luis Obispo Coast District
California Department of Parks and Recreation
Work Cell: (805) 458-5486
Personal Cell: (805) 748-5898
Chad.Jackson@parks.ca.gov

From: Campagne, Cody@NAHC <Cody.Campagne@nahc.ca.gov>
Sent: Friday, March 17, 2023 2:28 PM
To: Jackson, Chad@Parks <Chad.Jackson@parks.ca.gov>
Cc: Violet Sage Walker <violetsagewalker@gmail.com>; info@salinantribe.com <info@salinantribe.com>
Subject: San Simeon Modular Project

Good Afternoon,

Attached is the response to the project referenced above. If you have any additional questions, please feel free to contact our office email at nahc@nahc.ca.gov.

Regards,

Cody Campagne
Native American Heritage Commission
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Cody.Campagne@nahc.ca.gov
Direct Line: (916) 573-1033
Office: (916) 373-3710

State of California • Natural Resources Agency
Gavin Newsom, *Governor*
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Armando Quintero, *Director*
San Luis Obispo Coast District
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San Simeon, CA 93452
(805) 927-2094 telephone
(805) 458-5486 cell
Chad.Jackson@parks.ca.gov

Hearst San Simeon State Park Modular Project 2023

Dear Violet and tribe,

This letter is to notify you of a project undertaking by the San Luis Obispo Coast District of California State Parks. The project is to install new modular units at four locations in the district: two locations at Hearst Castle, one location adjacent to the Visitor's Center below Hearst Castle, and one location for staff housing in San Simeon Campground. Construction for the project will include trenching to install electrical, water, and other utilities and light grading to place modular buildings on gravel pads. Each specific location is going through a review of cultural resources to ensure no archaeological sites or tribal cultural resources will be impacted by construction.

At two of the locations, ground disturbance and underground utility work for the project has already occurred as part of an earlier phase: Elephant Hill at Hearst Castle and the staff housing at San Simeon Campground. At Elephant Hill, past grading and fill work created the 7,500 square foot footprint where Hearst Castle used to have a zoo including elephant quarters, kennels and staff buildings. Animal enclosures were demolished in the 1960s and the area was used for storage and parking. No precolonial archaeological resources are located near the site and much of past work has confirmed the absence of any Native American cultural resources. At San Simeon Campground archaeological sites and tribal cultural resources are found, although the area where the project takes place has been heavily disturbed in the past an early homestead and agriculture, and later the location of Van Gordon Creek Road which served as the original Highway 1. In October 2022 through Jan 2023 trenching for utilities occurred in previously disturbed soils with no precolonial archaeological deposits. Tribal monitoring occurred during the work and no resources were impacted although several isolated and redeposited artifacts were uncovered at shallow depths in previously excavated soils.

The third project location is for the guide complex at Hearst Castle located on the left of the entrance gate on "China Hill". Existing buildings will be replaced by a permanent modular building. Ground disturbance will be minimal to open up more space and tie in to existing utilities already onsite. No Native American cultural resources are present here, and the area has been previously disturbed by past construction of the road, existing buildings and partially within bedrock.

The fourth location will be adjacent to the Hearst Castle Visitor's Center at the existing District offices where the project will replace five modular buildings in the same location.

Some trenching and light grading will occur for the installation. A substantial archaeological investigation occurred during the original construction of the visitors center and District offices in 1984 including 40 augur tests, surface surveys and monitoring of grading activities (Orleans 1984). Three chert debitage fragments were observed on the surface but no other archaeological resources were observed in the augurs, surface or other grading. It is anticipated no Native American resources will be impacted by the project.

Please contact me if there are any concerns or questions with the project and if the tribe has any knowledge of tribal cultural resources in the project area. If you do with to respond please do so by April 8, 2023. Attached is a map of the work locations.

Sincerely,

Chad Jackson

Chad Jackson
SLO Coast District Archaeologist and Tribal Liaison

Attachments

cc: Doug Barker, Cal State Parks

Orleans, Robert
1984 Subsurface Archaeological Exploration at Hearst San Simeon State Historical Monument, San Luis Obispo County, California. On file with SLO Coast District DPR.

Photos:

Site 1: Elephant Hill at Hearst Castle.

D.2. Native American Contact List and Example of Notification for Consultation Letters (Letters sent to all listed contacts on NAHC Native American Contact List)

Native American Heritage Commission
Native American Contact List
San Luis Obispo County
3/17/2023

Barbareno/Ventureno Band of Mission Indians
Dayna Barrios, Chairperson
Phone: (805) 890 - 6855 — Chumash
barrios_dayna@yahoo.com

Barbareno/ Ventureno Band of Mission Indians
Annette Ayala, CRM Committee Chair
188 S. Santa Rosa Street — Chumash
Ventura, CA, 93001
Phone: (805) 515 - 9844
annetteayala78@yahoo.com

Chumash Council of Bakersfield
Julio Quair, Chairperson
729 Texas Street — Chumash
Bakersfield, CA, 93307
Phone: (661) 322 - 0121
chumashtribe@sbcglobal.net

Northern Chumash Tribal Council
Violet Walker, Chairperson
P.O. Box 6533 — Chumash
Los Osos, CA, 93412
Phone: (760) 549 - 3532
violetsagewalker@gmail.com

Salinan Tribe of Monterey, San Luis Obispo Counties
Patti Dunton, Tribal Administrator
7070 Morro Road, Suite A — Salinan
Atascadero, CA, 93422
Phone: (805) 464 - 2650
info@salinantribe.com

San Luis Obispo County Chumash Council
— Chumash

Tule River Indian Tribe
Joey Garfield, Tribal Archaeologist
P. O. Box 589 — Yokut
Porterville, CA, 93258
Phone: (559) 783 - 8892
Fax: (559) 783-8932
joey.garfield@tulerivertribe-nsn.gov

Tule River Indian Tribe
Neil Peyron, Chairperson
P.O. Box 589 — Yokut
Porterville, CA, 93258
Phone: (559) 781 - 4271
Fax: (559) 781-4610
neil.peyron@tulerivertribe-nsn.gov

Tule River Indian Tribe
Kerri Vera, Environmental Department
P. O. Box 589 — Yokut
Porterville, CA, 93258
Phone: (559) 783 - 8892
Fax: (559) 783-8932
kerri.vera@tulerivertribe-nsn.gov

Xolon-Salinan Tribe
Donna Haro, Tribal Headwoman
P. O. Box 7045 — Salinan
Spreckels, CA, 93962
Phone: (925) 470 - 5019
dhxolonaakletse@gmail.com

Xolon-Salinan Tribe
Karen White, Chairperson
P. O. Box 7045 — Salinan
Spreckels, CA, 93962
Phone: (831) 238 - 1488
xolon.salinan.heritage@gmail.com

yak tityu tityu yak tiłhini – Northern Chumash Tribe
Mona Tucker, Chairperson
660 Camino Del Rey — Chumash
Arroyo Grande, CA, 93420
Phone: (805) 748 - 2121
olivas.mona@gmail.com

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed San Simeon Modular Project, San Luis Obispo County.

PROJ-2023-001493 — 03/17/2023 02:25 PM — 1 of 1

State of California • Natural Resources Agency
Gavin Newsom, *Governor*
DEPARTMENT OF PARKS AND RECREATION
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San Simeon, CA 93452
(805) 927-2094 telephone
(805) 458-5486 cell
Chad.Jackson@parks.ca.gov

Hearst San Simeon State Park Modular Project 2023

Dear Mona and tribe,

This letter is to notify you of a project undertaking by the San Luis Obispo Coast District of California State Parks. The project is to install new modular units at four locations in the district: two locations at Hearst Castle, one location adjacent to the Visitor's Center below Hearst Castle, and one location for staff housing in San Simeon Campground. Construction for the project will include trenching to install electrical, water, and other utilities and light grading to place modular buildings on gravel pads. Each specific location is going through a review of cultural resources to ensure no archaeological sites or tribal cultural resources will be impacted by construction.

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The third project location is for the guide complex at Hearst Castle located on the left of the entrance gate on "China Hill". Existing buildings will be replaced by a permanent modular building. Ground disturbance will be minimal as the site is already graded and existing utilities are already onsite. No Native American cultural resources are present here, and the area has been previously disturbed by past construction of the road, existing buildings and partially within bedrock.

The fourth location will be adjacent to the Hearst Castle Visitor's Center at the existing District offices where the project will replace five modular buildings in the same location.

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Please contact me if there are any concerns or questions with the project and if the tribe has any knowledge of tribal cultural resources in the project area. If you do with to respond please do so by April 8, 2023. Attached below are maps of the work locations.

Sincerely,

Chad Jackson
SLO Coast District Archaeologist and Tribal Liaison

Attachments

cc: Doug Barker, Cal State Parks

Orleans, Robert
1984 Subsurface Archaeological Exploration at Hearst San Simeon State Historical Monument, San Luis Obispo County, California. On file with SLO Coast District DPR.

Site 1: Elephant Hill at Hearst Castle.

Site 2: San Simeon Campground Staff Housing.

Site 3: Guide Complex site

Site 4: District Offices next to Hearst Castle Visitor's Center.