



August 5, 2015

Ms. Ellie Wagner  
California State Parks-Planning Section  
1 Capitol Mall, Suite 410  
Sacramento, CA 95814

Dear Ellie,

The Point Lobos Foundation (PLF) thanks State Parks for the opportunity to participate in the July 22 Carmel Area State Parks General Plan alternatives workshop. We appreciate State Parks' efforts to involve key stakeholders and the general public in the very important General Plan process, as well as its efforts to incorporate many aspects of our prior input into the process.

This letter supplements our input at the workshop, to emphasize certain issues of particular importance to the PLF. It also reaffirms a number of concerns and questions our representatives registered at the meeting. Our intent is for these comments to be constructive. We hope they will be helpful to State Parks as it moves forward with developing a preferred alternative.

Key messages contained in our comments reflect our desires to see State Parks:

- Put clear and highest priority on preserving and enhancing the values for which PLSNR was designated, including a comprehensive plan for integrated management of parking, traffic and pedestrians both inside and outside the Reserve, and resource protection and restoration. The comprehensive plan needs to be supported by a determination of the Reserve's carrying capacity. We ask that the Parking and Circulation Special Study Report be shared with PLF to enable us to understand what approaches the consultant identified as most feasible and effective.
- Undertake additional efforts, working with other stakeholders, to address pedestrian safety issues on Highway 1.
- Explicitly recognize and plan for potential interconnecting trails among park units and with other relevant properties in the region.
- Remain open to the potential of a science camp located on the Ranch property, assure that the General Plan does not preclude such a facility, and allow PLF to see the Economics Special Study Report to understand the basis for the consultant's negative conclusions regarding such a facility. A complete economic and environmental feasibility analysis will be undertaken once the General Plan has identified the potential land use.

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- Help us understand the necessity for such a geographically extensive area of Preserve sub-classification on the Ranch property, and implications of such classifications on permitted uses and management of the properties
- Clarify for us how the management zones on the maps were determined and how they will be applied in practice.

The remainder of this letter provides more detailed explanation of these key messages, as well as additional comments, concerns and questions we would like to convey to State Parks.

### Moving Toward a Preferred Alternative

The alternatives presented by State Parks raise many issues and questions. Nonetheless, we were pleased to see a number of potential visitor uses reflected in various alternatives that could be incorporated into an appealing preferred alternative. Over the next few months, PLF will be working to develop a “blended alternative” that we feel most effectively represents our values and priorities for the Reserve and the Ranch. Our intent is to share the results of our thinking with State Parks before the Department has made final decisions on a preferred alternative.

We currently plan to identify an alternative that, at a minimum, addresses the issues discussed below.

### Preserving and Enhancing Values of PLSNR

We had hoped to see in the proposed Vision and Alternatives a clear statement of the critical importance of restoring, preserving and enhancing the values that underlie a Reserve designation, and for which PLSNR was designated. We had also hoped to see a clear statement of the need to manage visitor pressure on the Reserve to accomplish that objective, and an alternative that clearly demonstrated how the use and management of the Reserve together with the Ranch could be designed and implemented to achieve that objective.

We were pleased that the materials presented at the alternatives workshop acknowledged concerns that PLSNR is at risk of being “loved to death”. We also understand and were glad to see some components in the alternatives proposed for the Reserve and Ranch units that could be selectively combined to help limit current and anticipated future levels of visitor pressure on the Reserve.

However, it is not clear to us that State Parks has maintenance and restoration of the Reserve values as a priority objective, or that it has come up with an alternative that best combines potential changes at the Reserve, the Ranch and elsewhere to manage the volume of vehicle traffic and of walk-ins to accomplish this priority. Visitor experience and resource protection at the Reserve needs to be addressed and enhanced where possible, but not at the price of unacceptable negative impacts on other important values associated with the Reserve classification.

To accomplish that goal, we feel it is desirable to include facilities at the Ranch to address visitor needs at the Reserve. These might include appropriately designed and visually buffered parking, and repurposing of existing buildings for visitor use (e.g., a small visitor center, restrooms, merchandise and possibly food sales). The key objective would be to educate as

many visitors as possible before they enter the Reserve, emphasizing its special character and the need to treat it with respect and care.

We can conceive of a number of possible approaches that, if appropriately selected, combined and implemented in a well-designed long-term plan, could contribute to a goal of reducing visitor pressure on the Reserve. Some of these concepts were contained in the summary points from the Parking and Circulation Study that were included in the workshop presentation package. Some were also incorporated into the alternatives, others were not. In our view, possibilities could include:

- Relocating parking spaces in PLSNR away from any areas where current parking is causing or is likely to cause significant damage to important Reserve values (such as maintenance of coastal bluff integrity or water quality).
- Offset parking could be provided through new parking at Rat Hill within the Reserve and/or through new parking lots at the Ranch, shuttle service from planned parking at San Jose Creek on the Ranch property and Palo Corona Regional Park, as well as the potential for new parking at lower Hatton Canyon. These would provide visitor access with reduced impacts. (We strongly oppose putting new parking lots at the Bay School or Odello West because of their impacts on the scenic view shed.)
- Implementing a reservation or demand-based pricing system for vehicles entering the Reserve.
- Encouraging as many people as possible to use new parking lots rather than parking on Highway 1 and walking into the Reserve by managing parking on the highway (such as through prohibitions or a highway parking fee program).
- Charging walk-ins a minimal day use fee.
- Providing access to new trails on the Ranch to attract hiking visitors who would otherwise only have the Reserve as a choice to hike in that immediate area.

Developing a comprehensive visitor use management plan will require dealing with a number of tensions. For example, actions to move parking from within the Reserve to new parking lots outside, with shuttle transportation, would reduce vehicle loads considerably in the Reserve. However, adding new parking spaces would appear likely to result in a significantly larger total number of people walking around inside the Reserve. Is the volume of vehicle traffic in the Reserve more or less a concern than the volume of pedestrians in the Reserve? Why? Another question is how to most safely and effectively move vehicles in and out of non-Reserve parking lots? What are the best ways to get visitors across the highway from any new parking at the Ranch (e.g. crosswalk and/or stoplight in the short-term? tunnel in the long-term?).

We would very much like to see the full Parking and Circulation Special Study Report, so that we can understand what the consultants concluded would be most feasible and effective.

We envision that State Parks will need to address these kinds of tensions, in part through the carrying capacity determination for the Reserve that is to be a part of the General Plan. An effective and implementable determination of carrying capacity for PLSNR would seem to be a critically important underpinning of any combination of approaches incorporated into a preferred alternative.

Carrying capacity was not addressed in the alternatives workshop. This is a substantial issue now. The State Parks General Planning Handbook discusses the topic. However, it is still not clear to us how State Parks will approach determining carrying capacity for the Reserve, how

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any carrying capacity determination would be applied in practice, and what are the implications of the carrying capacity determination to construction of a preferred alternative.

### Pedestrian Safety Issues on Highway 1

We understand that State Parks does not have control over parking on Highway 1, and may or may not currently have authority to charge a fee for walk-ins into the Reserve (or into the Ranch in the future). However, it is critically important that parking on the highway be addressed as soon as possible. This is partly to address visitor pressure on the Reserve, but equally important, it is to address the safety issues currently presented by pedestrians walking into the Reserve along and across Highway 1.

Informal conversations with some State Parks representatives have led us to believe that State Parks has concluded, based on the Department's conversations with CalTrans and the County, that nothing can be done in the General Plan to address this issue. However, absent more information about these conversations, and confirmation from CalTrans and the County, we continue to believe that a coordinated effort by key stakeholder organizations, working with State Parks, has potential to drive some progress in addressing the important safety concerns.

### Interconnecting Trails

We were pleased to see in the workshop presentation the proposed Vision Statement reference to the important role the Carmel Area State Parks play "in connecting people to many of the surrounding region's parks and open space lands." We understand that State Parks does not see the General Plan as a document in which to identify specific trail alignments. Nonetheless, we would like to see a much stronger expression of intent to incorporate the potential for interconnecting trails among Park units and with other properties in the region into the General Plan. We would also like to see State Parks explicitly recognize the need for the General Plan not to preclude the potential for new and connected trails, at least along currently identifiable potential pathways.

### Science Camp/Overnight Accommodations

The "Issues and Opportunities" section of the workshop presentation package identified an opportunity for a science/education camp among other facilities opportunities. However, we were surprised that the alternatives did not mention the potential for such a facility at the Ranch. Such a multi-purpose facility would serve to address important State Parks' values and objectives of reaching youth, as well as potentially provide overnight rental accommodations (e.g. for families) when not being used by the camp. The science camp concept received strong endorsement from multiple organizations at the January 2015 Stakeholder/Agency workshop and at the recent Alternatives workshop.

It appears that the only rationale for omitting a science camp use from the alternatives are conclusions by the special Economics Study that such a facility "would have a negative 10-year internal rate of return" and that "CDPR does not collect rent or revenue from science school." These conclusions seem highly premature. There would appear to be abundant examples inside and outside the State Park system that demonstrate the public value and financial feasibility of such educational camps. Therefore, we ask State Parks to allow us to see the Economics Special Study Report. Otherwise, we are not able to understand how or why the consultant came to this conclusion, and not able to view the study's conclusions as determinative of the issue.

We strongly desire the opportunity to demonstrate to State Parks that the concept has clear and sound potential. Ideally, we would like to see State Parks acknowledge that an appropriately designed and implemented science camp facility, especially if combined with overnight rental accommodations, could deliver significant positive values. It seems clear that the question of whether the concept is financially or otherwise feasible has not been fully resolved and merits further analysis of possible scenarios. A number of stakeholders have expressed interest joining an effort to further develop and evaluate the concept for consideration by State Parks. At a minimum, we would like to be confident that nothing in the Ranch unit classification or sub-classification, in the preferred alternative, or in the final General Plan will preclude such a facility.

### Unit Classifications

We are very pleased that State Parks does not intend to re-classify the PLSNR property west of the highway. We do not object to combining the Gowan Cypress inholding (which has been technically a part of PLSNR) with the A. M. Allan Ranch (the Ranch) into a single park unit.

We would like State Parks to help us understand the rationale and justification for sub-classifying so much of the Ranch property as Preserve under either alternative presented. It is not clear to us why such an extensive restrictive designation is necessary. State Parks representatives have told us that hiking (including unguided) trails are permitted under a Preserve designation, but that motorized trails and structures are not allowed. We would like to more fully understand the ways in which a Preserve designation may be used to enable and constrain future management decisions to allow or disallow other potential uses. The definition of "Natural Preserve" in PRC Section 5019.71 and "Cultural Preserve" in PRC Section 5019.74 provide us insufficient guidance in this respect. PRC Section 5001.8 clearly prohibits motor vehicle use in natural and cultural reserves, but does not say anything about any other potential restrictions, such as temporary or permanent structures.

We are concerned that the large geographical extent of the proposed Preserve sub-classification has potential to unduly limit important future opportunities to use certain areas of the Ranch (particularly in the former dairy operation) that may be desirable under a long-term General Plan. We are also not clear why so much of the Ranch property would receive a more restrictive level of protection than PLSNR (the crown jewel of the State Park system).

We are also not convinced of the desirability of combining the Ranch with the Carmel River State Beach into a single State Park unit. We are concerned that will reduce flexibility needed to plan and manage the Ranch most effectively, especially in concert with the Reserve. If this could potentially be the outcome, combining the Ranch and Carmel River State Beach properties into a single unit would not seem to be justified by administrative convenience to State Parks. It will confuse the public if the Ranch and Carmel River properties are combined into a single park unit with different classifications. These two distinct properties will require substantially different management regimes. What visitors are permitted to do on the different properties will be different.

We understand the unit designation process proceeds outside the formal General Plan process. We have seen the list of "criteria considered for unit classification" contained in the workshop presentation. However, decisions State Parks makes on these matters will strongly affect public acceptance of the preferred alternative that will rest on such sub-classifications. Therefore, we would strongly benefit from the opportunity to talk with State Parks to better understand the

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reasons for the Ranch sub-classification and Preserve boundaries, the pros and cons of combining the Ranch and Carmel River State Beach properties into a single Park, and the near- and longer-term implications of such designations for unit management and development.

### Management Zones

We have a number of questions about how and why the type and boundaries of the management zones depicted on the workshop maps were selected. We are also uncertain whether the zones depicted would be sufficiently diverse and adaptable to capture all the land uses and management flexibility desirable to be incorporated into a long-term General Plan. As an example, we wonder whether the two management zones designated in PLSNR – Coastal Bluff and Forest – would be sufficient to support potential management goals of restoring, increasing, and managing coastal prairie and other important habitats in the Reserve. Therefore, we would like to better understand the thinking behind these management zone designations and how they can be applied in practice, to know whether any concerns we have are justified.

### General Plan Goals

We understand the final General Plan will include multiple goals and guidelines to guide management of the CASP units. It would be extremely useful if State Parks could help us understand what goals, if any, were associated with the unit classifications and alternatives presented. Absent goals that support a rationale for the classification options and contents of the alternatives, we are uncertain what outcomes the alternatives were designed to accomplish. We found the brief explanation of the two “themes” during the workshop presentation to be confusing, as they did not seem to align with the specifics of the alternatives.

### Other Recommendations

We strongly believe that no new infrastructure, such as facilities at Odello West or a parking lot at Bay School, should be placed in the currently undeveloped scenic view shed on the west side of Highway 1.

We strongly support ending use of Hudson House for State Parks staff housing, and support making it available for appropriate public uses. These could include weddings, classes and other special events consistent with the historic uses of Hudson House. It may also be appropriate to explore other ways in which access to and use of Hudson House and its surrounding property could benefit the Reserve.

We strongly oppose any aerial trails in the Ranch as inconsistent with the quality of the physical and visual environment and visitor experience that should be the aim of a State Park on that property.

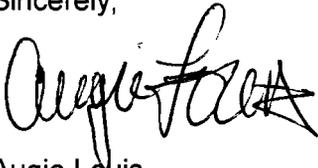
Based on the experience at the alternatives workshop, we suggest that State Parks and Ascent consider certain process improvements for future stakeholder/agency and public meetings on the preferred alternative and draft General Plan. Pre-meeting information that is more detailed and clear (and includes relevant and useful explanatory narrative) could be posted on the General Plan website more than 48 hours before the meeting. The meeting duration should be sufficiently long to allow enough time for a detailed informative presentation (including explanation of how the input from prior GP activities has been fed into the preferred alternative), as well as opportunity for Q&A. Any exercise that involves splitting meeting participants into

sub-groups would aim to keep the size of the subgroups small enough to facilitate coherent communication and input.

In conclusion, we hope that State Parks will find the above comments useful and constructive. We also hope that State Parks will be willing to schedule a meeting with PLF representatives as soon as possible to educate us on the topics about which we would appreciate further information. In that way, we will be best able to understand where and how PLF's priorities can align with and support State Parks' needs and priorities going forward.

I welcome any questions you or others at State Parks may have about these comments and look forward to meeting with you soon.

Sincerely,

A handwritten signature in black ink, appearing to read "Augie Louis". The signature is fluid and cursive, with a large initial "A" and "L".

Augie Louis  
President

cc: Mat Fuzie  
Jim Bilz  
Steve Bachman