



September 25, 2018

California State Parks  
Strategic Planning and Recreation Services Division  
Recreation Planning  
P.O. Box 942896  
Sacramento, CA 94296  
ATTN: Ellie Wagner

SUBJECT: Carmel Area State Parks Preliminary General Plan and draft EIR

Dear Ms. Wagner,

The Point Lobos Foundation (PLF or the Foundation) appreciates the opportunity to provide comments on the Carmel Area State Parks (CASP) Preliminary General Plan (PGP) and draft Environmental Impact Report (EIR). The PLF Board of Directors and key staff have carefully reviewed all of the written materials released to the public, and several board members and our Executive Director attended the September 10 public meeting on the PGP. We offer these comments on behalf of the Foundation.

We applaud the efforts State Parks has clearly made to carefully consider the input previously received on the Preferred Alternative for the General Plan. We also wish to commend the Monterey District staff of State Parks for their outreach to a number of concerned stakeholders after the public meeting on the Preferred Alternative in June 2016. Many of the issues involved in the General Plan are complex and potentially controversial. Integrating the views of many diverse stakeholders, as well as State Parks' internal requirements and drivers, into a cohesive CASP PGP has undoubtedly been very challenging.

We understand that the General Plan needs to be reasonably general and high level in order to serve as a long-term framework for action by State Parks in the CASP. Therefore, we also recognize that implementation of many aspects of the General Plan will require future studies, assessments, development of management plans, etc., to provide the detailed information necessary to support specific actions. With this in mind, PLF commends State Parks for developing a PGP that provides broad guidance in many areas of major interest to PLF. These will be very useful to us, as State Parks' partner, as specific projects are developed and undertaken together in support of the General Plan.

PLF also appreciates that the PGP addresses many of the key concerns PLF and other stakeholders expressed in comments in previous phases of General Plan development. Specifically, we are very pleased to see that the PGP:

1. Places a high priority on restoration of natural and cultural resources at Point Lobos State Natural Reserve, as well as on protection of very sensitive natural and cultural resources (especially Tribal Cultural Resources' sacred sites) in the New State Park, providing for public access while emphasizing resource protection over visitor use. As part of resource protection, the PGP recognizes the importance of invasive species management, mapping of sensitive resources, and research, all of which are of major interest to, and supported by, PLF.
2. Consistently stresses a strong focus on reducing visitor loads at the Reserve through a multi-component approach involving a reservation system, managing and charging a fee for walk-ins, providing a shuttle service that includes a transportation hub in lower Hatton Canyon (also known as Marathon Flats), and the potential for additional parking at Point Lobos Ranch and other alternative locations.
3. Affirms the vital importance of visitor education and interpretation as part of a high-quality visitor experience. This includes the key roles played at the Reserve by State Parks docents, the visitor education potential associated with the proposed transportation hub and shuttle system, and consideration of the possible re-use of some existing staff residences at the Reserve and/or the Ranch for other purposes, such as visitor information/orientation.
4. Recognizes the essential role that organizations such as PLF and the partners in the Lobos Corona Parklands Project will play in supporting implementation of the General Plan.
5. Acknowledges the significant risks that climate change will pose to CASP resources, facilities and infrastructure and identifies goals and guidelines for adaptation to those risks.
6. Addresses the need for more aggressive fire management actions to address the risks associated with potential wildfires in the Reserve or in surrounding areas.
7. Recognizes the value of encouraging integration of the CASP into the broader region, especially in context of interconnecting trails, integrating visitor access and resource management across lands managed by multiple organizations, and pursuing partnerships between CSP and other organizations to achieve common and aligned goals and objectives.

At the same time, PLF has certain concerns and questions about the PGP. Specifically:

1. The PGP appropriately recognizes the need to determine visitor capacity limits, especially for the Reserve. Presumably, this information will be needed to set access limits using a reservation system and/or other visitor management approaches. The PGP states that visitor capacity levels will be set in Step 3 of the Adaptive Management Approach. However, the discussion provides no clarity about how that will actually be done, or any explanation of how capacity limits, once set, will be implemented and enforced.
2. The PGP appropriately recognizes that managing visitor access and use will be essential to achieve the resource protection and visitor experience goals identified for the CASP units, especially the Reserve. Therefore, the components of the PGP related to traffic, reservation system, fees, parking and shuttles are critically important. We understand why the format of the PGP disaggregates discussion of individual components throughout various locations in the PGP. However, that disaggregation makes it extremely difficult to understand how the various components of a comprehensive plan for traffic, parking and transportation would fit

together functionally and in what sequence. Therefore, we suggest there would be benefit in providing a coherent narrative somewhere in the plan that describes how the various components would most likely be integrated and phased in. As part of that, it would be helpful to clarify, for example:

- Whether a reservation system would be the first step, and whether it could be implemented before parking is provided at the Ranch or at Hatton Canyon, or before shuttle service from Hatton Canyon is in place.
  - How a fee system would be reflected in reservations, reserve entry by both vehicles and walk-ins, parking and shuttles.
  - How the potential exacerbation of parking inside and outside the Reserve will be considered if unpaved parking areas near the South Shore are removed to reduce erosion before alternative parking is provided at the Ranch or Hatton Canyon.
  - Under what conditions construction of a larger parking lot at Point Lobos Ranch, to provide parking for the Reserve, would be considered.
3. We are encouraged to see references in the PGP to the need for adequate CSP staff to provide effective resource management and park user services, and thus the need to add more rangers, seasonal park aides and a maintenance person to support the CASP. However, it appears that those new resources would be directed to the New State Park rather than assisting with resource needs in the Reserve, and that any additional needed support for the Reserve is expected to come solely from volunteers and non-profit organizations. District staff resources allocated to support the Reserve are severely overstretched. There is a limit to what volunteer and non-profit support can do to substitute for CSP staff. We strongly encourage the final General Plan to clearly identify the need for additional staff support for the Reserve specifically, to avoid jeopardizing successful achievement of the plan's very important goals for the Reserve.
  4. The central concept in the PGP of "appropriately distributing visitor use throughout CASP units" is excellent. However, it may not be realistic if most visitors to the Reserve come because of its unique coastal features and topography, and may therefore be unlikely to be enticed to hike in the hills of the New State Park as an alternative. Further, the PGP clearly states that "a key planning issue is the degree to which visitor facilities that may increase demand should be added." It acknowledges concerns that opening up areas in the New State Park to public access could increase overall visitation, exacerbate traffic and parking congestion, and potentially cause a number of other undesirable impacts. In this context, the PGP states only that "The General Plan team will review facility constraints and opportunities and the General Plan will provide guidance about what facilities will be planned on each property and which existing facilities could be adapted to provide for the desired uses." This language does not seem to adequately address the core issue. Therefore, we suggest that the General Plan should provide some assurance that potential to increase, rather than redistribute, visitation will be considered when evaluating and planning key future activities to implement the Plan, such as new parking lots.
  5. A related issue involves the risk that giving the public information about, and access to, areas containing Tribal Cultural Resources' sacred sites will open up new potential for visitor

damage to such sites. We recommend that the General Plan clearly acknowledge those risks and provide assurance that they will be carefully considered and addressed in future planning for public access to such areas.

6. PLF has previously expressed concerns about placing new parking or other visitor-serving facilities in the coastal area of the New State Park that is commonly known as Odello West. Such facilities would negatively affect the viewshed from the highway. They would also seem to be at risk of future flooding, especially when the new causeway is built under the highway to reroute Carmel River flood water into the Odello West area. We would like to see the General Plan discuss how the causeway component of the Carmel River FREE project will potentially affect the viability of any existing or future State Park facilities on the west side of SR1.
7. The PGP offers consistent references to visitor orientation and education, but falls short of committing to a stand-alone Visitor Center with concessions. Such a facility would benefit visitors with an orientation to all of the Carmel Area State Parks, and would enforce an educational element stressing the importance of preserving and protecting the fragile resources found in the Reserve and the New State Park.
8. We would very much like to see a clear commitment in the PGP to support an assessment of the potential to convert Hudson House to at least some limited public uses consistent with federal historic structure standards.
9. We understand that it may be difficult at this stage for CSP to identify specific priorities for plan implementation within the Reserve, or priorities as between the Reserve and the New State Park. Similarly, it may be early to identify a timeline of proposed construction of improvements at the Reserve or elsewhere. Nonetheless, we would urge State Parks to do anything it can at this stage to identify such priorities, as this will greatly assist PLF's ability to anticipate and plan for fund-raising to support key priorities and improvements.

Finally, we have a few more minor suggestions and questions about text in the PGP:

1. On page 2-107, the reference to the magazine published by PLF should be revised to clarify that it is now only available to PLF members, and the reference to quarterly publication should be deleted.
2. On page 2-112, the number of active Reserve docents should be changed to 219.
3. On page 2-114, we would like to replace the description of the services PLF provides with the following description that more thoroughly encompasses the support we provide to CSP, as follows:

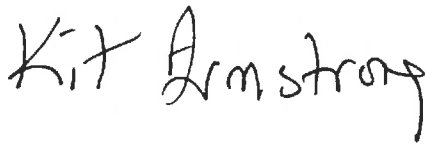
“Point Lobos Foundation (PLF) – is the non-profit organization supporting the Reserve. PLF assists CSP by providing financial support of the CSP docent program and projects and programs benefitting the Reserve and/or its visitors. Those include trail and facility improvements, school and youth program support and interpretive improvements like the

development of the “Discover Point Lobos” iPad application for children. PLF also places critical priority on the health on the natural resources within the Reserve, financially supporting ongoing natural resources research through the CSUMB Graduate Intern Research program, invasive species removal programs and habitat restoration projects.”

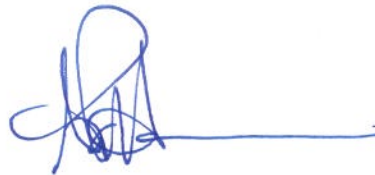
4. On page 3-23, the reference to what PLF is “dedicated to” should be changed to state that “The mission of PLF is to protect and nurture Point Lobos State Natural Reserve, to educate and inspire visitors to preserve its unique natural and cultural resources, and to strengthen the network of Carmel Area State Parks.”
5. On page 4-63, why is the Coastal Creek theme listed under Hatton Canyon when the example offered is San Jose Creek in the Ranch section of the New State Park?
6. On page 4-64, regarding Marine Zone Management Intent, should not kayaking also be listed as one of the authorized uses?

We deeply appreciate the hard work represented by the PGP, and hope that our comments will assist CSP in the development of the final General Plan. We would welcome the opportunity to meet with CSP staff to discuss any of the issues addressed in our comments.

Sincerely,



Kit Armstrong, President  
Point Lobos Foundation



Anna Patterson, Executive Director  
Point Lobos Foundation

cc: Brent Marshall, Monterey District Superintendent

