CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
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CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY EXEMPTION FOR RESTORATION PROJECTS
CONCURRENCE NO. 21080.56-2025-084-R4

Project:	Pismo State Beach Foredune Restoration and Improvement Project
Location:	San Luis Obispo County
Lead Agency:	California Department of Parks and Recreation
Lead Agency Contact:	Ronnie Glick; ronnie.glick@parks.ca.gov

Background

Project Location: The Pismo State Beach Foredune Restoration and Improvement Project (Project) is located within Pismo State Beach, in the city of Grover Beach and the unincorporated area of Oceano, in San Luis Obispo County, California; centered at approximately 35.11623, -120.63131; Section 00, Township 32 South, Range 13 East; U.S. Geological Survey Maps Pismo Beach and Oceano OE W; Assessor's Parcel Numbers 060-381-011, 060-381-010, 060-382-002, 060-382-003, 061-101-010, and 061-101-011.

Project Description: Coastal San Luis Resource Conservation District (CSLRCD), in partnership with California Department of Parks and Recreation (CDPR)(collectively, Project Proponents) propose to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend and restore or provide habitat for California native fish and wildlife.

The Project includes the following restoration activities:

- Removal of invasive plant species with manual, mechanical, pile burning, and targeted herbicide application methods. Target species include, but may not be limited to, iceplant (*Carpobrotus edulis*), European beachgrass (*Ammophila arenaria*), golden wattle (*Acacia longifolia*), Australian tea tree (*Leptospermum laevigatum*), and spider gum eucalyptus (*Eucalyptus conferruminata*).
- Collection of seeds from native species and propagation of seeds in CDPR greenhouses.
- Revegetation with a palette composed of locally native dune-specialized species, including, but not limited to, yellow sand-verbena (*Abronia latifolia*), beach evening primrose (*Camissoniopsis cheiranthifolia*), dune ragwort (*Senecio blochmaniae*), and beach bur (*Ambrosia chamissonis*).
- Installation of interpretive signage and fencing.
- Adaptive management, including follow-up herbicide treatments, supplemental

revegetation, and other activities as needed.

Restoration activities will be carried out amongst four management areas, totaling 151 acres of foredune habitat. Invasive plant species removal methods will be tailored to specific conditions within management areas. Plantings will be installed in a manner which varies by density and species composition, largely depending on the proximity to wind and sand exposure, dune elevation, and the presence of pre-existing native vegetation. These efforts are intended to restore dune form and function, resulting in a more diverse native plant community and improved habitat quality for native wildlife.

Funding for planning and implementation of the Project is provided by the California Department of Fish and Wildlife (CDFW) Office of Spill Prevention and Response Environmental Enhancement Fund. Additional funding and in-kind services will be provided by the California Department of Parks and Recreation.

Tribal Engagement:

CDPR requested the Native American Heritage Commission (NAHC) provide a list of tribal contacts which may be affiliated with the Project site geographical area. The NAHC provided a list of 13 tribal contacts. CDPR has informed tribal contacts of the Project and provided opportunities to engage. CDPR has been coordinating with responsive tribes through multiple forms of communication, including emails, phone calls, video meetings, and site visits.

Interested Party Coordination:

CSLRCD has prepared a Public Engagement and Outreach Plan (Plan) to increase awareness of and build support for the Project. Outreach strategies outlined in the Plan include, but are not limited to, social media engagement, public meetings and presentations, and feedback solicitation. To date, Project proponents have coordinated with the California Coastal Commission, California State Coastal Conservancy, and the City of Grover Beach. Social media platforms have been used to provide transparency to the public during Project planning. Further coordination with interested parties will occur as outlined within the Plan.

Anticipated Project Implementation Timeframes: Start date: upon Project approval
Completion date: October 31, 2035

Lead Agency Request for CDFW Concurrence: On November 4, 2025, the Director of CDFW (CDFW Director) received a concurrence request from the Lead Agency pursuant to Public Resources Code section 21080.56, subdivision (e) (Request). The Request seeks the CDFW Director's concurrence with the Lead Agency's determination on November 4, 2025, that the Project meets certain qualifying criteria set forth in subdivisions (a) to (d), inclusive, of the same section of the Public Resources Code (Lead Agency Determination). The CDFW Director's concurrence is required for the Lead Agency to approve the Project relying on this section of the California Environmental Quality Act (CEQA). (Pub. Resources Code, § 21000 et seq.).

Concurrence Determination

The CDFW Director concurs with the Lead Agency Determination that the Project meets the qualifying criteria set forth in Public Resources Code section 21080.56, subdivisions (a) to (d), inclusive (Concurrence).

Specifically, the CDFW Director concurs with the Lead Agency that the Project meets all of the following conditions: (A) the Project is exclusively to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or is exclusively to restore or provide habitat for California native fish and wildlife; (B) the Project may have public benefits incidental to the Project's fundamental purpose; (C) the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and includes procedures and ongoing management for the protection of the environment; and (D) Project construction activities are solely related to habitat restoration. Pursuant to Public Resources Code section 21080.56, subdivision (g), CDFW will post this Concurrence on its CEQA Notices and Documents internet page: https://wildlife.ca.gov/Notices/CEQA.

This Concurrence is based on best available science and supported, as described below, by substantial evidence in CDFW's administrative record of proceedings for the Project.

This Concurrence is also based on a finding that the Project is consistent with and that its implementation will further CDFW's mandate as California's trustee agency for fish and wildlife, including the responsibility to hold and manage these resources in trust for all the people of California.

Discussion

A. Pursuant to Public Resources Code section 21080.56, subdivision (a), the CDFW Director concurs with the Lead Agency that the Project will exclusively conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or restore or provide habitat for California native fish and wildlife.

   The Project will enhance the structural and functional integrity of 151 acres of coastal foredunes via the removal of invasive plant species that threaten biodiversity, and the restoration of habitat by conducting revegetation with locally native dune-specialized species. This will assist in the recovery of rare plant and wildlife species, and the habitat upon which they depend.

B. Pursuant to Public Resources Code section 21080.56, subdivision (b), the CDFW Director concurs with the Lead Agency that the Project may have incidental public benefits, such as public access and recreation.

   Pismo State Beach offers various attractions, including, but not limited to, surfing, fishing, horseback riding, and camping. Public access to and recreation within Pismo State Beach is vital to the regional economy. Though the Project does not include

activities tailored to public access and recreation, the Project will improve upon the natural beauty of Pismo State Beach by removing non-native, invasive species and planting native species. The Project also includes the installation of interpretive signage, along trails and beach access points, to educate visitors on the importance of functional coastal dune ecosystems. Fencing will be installed to protect restoration areas from human disturbance and direct the public to accessible areas. These public benefits are incidental to the greater Project purpose of coastal dune habitat restoration.

C. Pursuant to Public Resources Code section 21080.56, subdivision (c), the CDFW Director concurs with the Lead Agency that the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery, and includes procedures and ongoing management for the protection of the environment.

Long-term Net Benefits to Climate Resiliency:

Beaches are a diverse ecotone influenced largely by wave energy and wind. Functional dunes serve to absorb wave energy and reasonably resist erosion. Instable dunes are prone to downwind migration, resulting in landward movement of the dune. Therefore, instable dunes are more prone to erosion during storm surges, ineffectively protecting inland areas from flooding. As climate change worsens, storm surges are expected to become more frequent and severe, and sea levels will rise. It is vital that dune functionality be preserved.

Existing conditions at the Project site can be characterized by a mixture of instable dunes and an over-abundance of non-native, invasive vegetation. Non-native vegetation often over-stabilizes dunes by developing deep root systems that trap sand and cause steep dune faces. Though these dunes may offer stability under normal tidal conditions, steep dune faces are more prone to collapse during storm surges. By removing non-native vegetation and replacing it with native dune-specialized vegetation, natural dune migration will be promoted, while offering appropriate stability, adaptability, and resilience to climate stressors.

Long-term Net Benefits to Biodiversity:

The Project site occurs within the greater Guadalupe-Nipomo Dunes Complex, which is one of the largest intact coastal dune ecosystems. The Complex supports several rare and endemic species, as well as sensitive natural communities, including Central Dune Scrub and Central Foredunes. These rare communities are biologically rich, serving as hotspots for biodiversity. Plants and animals that occur within these communities have evolved unique adaptations to survive harsh dune-associated conditions, such as limited water resources, sand burial, and wind. The biodiversity of these communities is threatened by the infestation of non-native, invasive plant species.

Non-native, invasive plant species spread rapidly once established, forming dense colonies that outcompete native species for resources. Non-native infestations

contribute to the decline of native species, limit biodiversity, and isolate ecological corridors. By removing non-native invasive plant species, resources will become available for native plants to thrive. Planting efforts will establish a more diverse plant community, with a myriad of native dune-specialized species. This conversion to native species will improve the quality of habitat for wildlife by establishing microhabitats of sparsely vegetated dune mat and denser dune scrub. These microhabitats will revitalize the food web and increase suitability of habitat for species on the decline.

Long-term Net Benefits to Sensitive Species Recovery:

The Project revegetation palette includes native species with a California Rare Plant Ranking (CRPR), including Blochman's leafy daisy (*Erigeron blochmaniae*)(CRPR 1B.2), red sand verbena (*Abronia maritima*)(CRPR 4.2), dune ragwort (CRPR 4.2), and dunedelion (*Malacothrix incana*)(CRPR 4.3). By incorporating these sensitive species into the revegetation palette, the Project will contribute directly to their recovery.

Also, the revegetation palette includes species that will offer pollen, nectar, seed, and fruit as food resources for an abundance of species. Notably, Pismo State Beach hosts critical overwintering sites for western monarch butterflies (*Danaus plexippus*). Monarch butterflies are proposed threatened under the federal Endangered Species Act. The Project site will provide refuge for travelling monarchs, and nectar resources for overwintering monarchs.

The Project will also improve the habitat suitability for terrestrial animal species such as the northern California legless lizard (*Anniella pulchra*), a CDFW Species of Special Concern. The northern California legless lizard prefers habitats with shallow root systems conducive to burrowing, and sparse vegetation with opportunities for cover and thermoregulation. By eliminating non-native invasive plant communities, and replacing them with native species, northern California legless lizard is expected to become more abundant within the Project site.

Procedures for the Protection of the Environment:

CDPR staff conducted a desktop review to compile a list of species with potential to occur within the Project site. Desktop review included a query of the California Natural Diversity Database and the U.S. Fish and Wildlife Service Information for Planning and Consultation, as well as a literature review. CDPR also conducted reconnaissance surveys in 2023 and 2025. These efforts contributed to the development of Standard Project Requirements, which outline procedures for the protection of the environment. Standard Project Requirements include avoidance and minimization measures pertaining to cultural resources, biological resources, air quality, and water quality.

Ongoing Management for the Protection of the Environment:

To ensure the Project is successful in establishing native coastal dune habitat, the Project Proponents are developing a long-term Monitoring Plan. At minimum, the Monitoring Plan will include annual assessments of the Project site, to examine performance standards pertaining to vegetative cover, species composition, and habitat function. If the data retrieved from annual assessments suggests performance standards are not being met, adaptive management activities will be conducted. Adaptive management activities may include, but not be limited to, follow-up non-native plant species removal where invasion persists, and revegetation in areas of low vegetative cover. Standard Project Requirements will be implemented for all adaptive management activities.

D. Pursuant to Public Resources Code section 21080.56, subdivision (d), the CDFW Director concurs with the Lead Agency that the Project does not include any construction activities, except those solely related to habitat restoration.

   All Project activities are solely related to habitat restoration. Though the Project may utilize construction equipment, the Project does not include the construction of permanent infrastructure or public facilities. Permanent interpretive signage will be placed on existing structures such as the boardwalk and other already developed areas, while temporary interpretive signage and fencing will be installed to serve as protective measures during project implementation. All temporary features will be removed upon completion of the Project.

Scope and Reservation of Concurrence

This Concurrence is based on the proposed Project as described by the Lead Agency Determination and the Request. If there are any subsequent changes to the Project that affect or otherwise change the Lead Agency Determination, the Lead Agency, or any other public agency that proposes to carry out or approve the Project, shall submit a new lead agency determination and request for concurrence from CDFW pursuant to Public Resources Code section 21080.56. If any other public agency proposes to carry out or approve the Project subsequent to the effective date of this Concurrence, this Concurrence shall remain in effect and no separate concurrence from CDFW shall be required so long as the other public agency is carrying out or approving the Project as described by the Lead Agency Determination and the Request.

Other Legal Obligations

The Project shall remain subject to all other applicable federal, state, and local laws and regulations, and this Concurrence shall not weaken or violate any applicable environmental or public health standards. (Pub. Resources Code, § 21080.56, subd. (f).)

CDFW Director's Certification

By:_____ Date: 12/8/25

Charlton H. Bonham, Director
California Department of Fish and Wildlife