

CALIFORNIA COASTAL COMMISSION

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STAFF REPORT AND RECOMMENDATION  
ON CONSISTENCY DETERMINATION

Consistency Determination  
 No. CD-105-95  
 Staff: LJS-SF  
 File Date: October 26, 1995  
 45th Day: December 10, 1995  
 60th Day: December 25, 1995  
 Commission Meeting: Dec. 14, 1995

FEDERAL AGENCY: National Park Service

DEVELOPMENT LOCATION: Cabrillo National Monument, Point Loma, City of San Diego (Exhibit 1)

DEVELOPMENT DESCRIPTION: General Management Plan for Cabrillo National Monument (N.M.) (Exhibits 2-9)

SUBSTANTIVE FILE DOCUMENTS:

1. City of San Diego Local Coastal Program.
2. Cabrillo National Monument, Draft General Management Plan and Environmental Impact Statement, May 1995.
3. Consistency Determination CD-28-94 (National Park Service: Comprehensive Design Plan for Sutro Historic District, Golden Gate National Recreation Area, San Francisco)

EXECUTIVE SUMMARY

The National Park Service (NPS) has submitted a consistency determination for a draft General Management Plan (GMP) for Cabrillo National Monument (N.M.), located on the Point Loma peninsula in the City of San Diego. The GMP describes a proposal and three alternatives for management, use, and development at Cabrillo N.M. A GMP provides a blueprint to guide park management decisions and offers strategies for addressing issues and achieving identified management objectives over a 10- to 15-year period. Strategies include programs, actions, and support facilities necessary for proper management of monument resources, appropriate levels of visitor use, interpretation of resources, and efficient monument operation.

Part of the function of this Commission analysis at the general management plan phase is to identify potential problem areas and projects which would likely affect the coastal zone if built. For these projects additional consistency determinations from NPS will be necessary. The practical value of this approach is that it: (1) provides NPS, in advance of specific project implementation, notice of what issues are likely to arise under the California Coastal Management Program; and (2) it provides the Commission with an overall planning context within which to review specific projects subsequently proposed. The Commission can also ease its administrative burden by identifying at the conceptual or management plan stage those projects that do not affect the coastal zone or where effects are sufficiently minor to allow future authorization through the negative determination procedure.

The proposed draft GMP is generally consistent with the public access and recreation, scenic view, and environmentally sensitive habitat protection policies of the California Coastal Management Program (CCMP) (Sections 30210-30213, 30220-30223, 30251, 30230, 30231, and 30240 of the Coastal Act). However, some of the projects proposed under the draft GMP (in particular, entrance station relocation, tidepool facility development and management strategies, and implementation of the trail plan) have the potential to affect public access, recreation, and sensitive habitat. Before the Commission could find such development consistent with the applicable policies of the Coastal Act, the Commission will need additional information and analysis regarding planned development, coastal zone effects, and mitigation (if necessary). The NPS has agreed to provide the Commission with the opportunity to evaluate this information and analysis, as well as project-specific plans, at future phases of GMP implementation when the NPS submits consistency determinations for those projects. With this commitment by the NPS, the Commission finds that the proposed draft GMP is consistent with the aforementioned resource protection policies of the CCMP

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#### STAFF SUMMARY AND RECOMMENDATION:

I. Project Description. The Park Service proposes a General Management Plan (GMP) for Cabrillo National Monument in San Diego (Exhibits 1-3). The 144-acre monument is an enclave within the federal military reservation on Point Loma. The NPS also administers a 120-acre intertidal and subtidal area extending 300 yards offshore on the west side of the monument, and 16 acres of land on the western slope of Point Loma between the Point Loma Light Station and the monument boundary. Facilities at the monument include a visitor center complex (visitor center, auditorium, exhibit room, administration building, overlook with the statue of Juan Rodriguez Cabrillo, and 300-vehicle parking area), the Old Point Loma Lighthouse, the Whale Overlook shelter, entrance station, the 25-vehicle Ocean View parking area, maintenance buildings, and trails, roads, and scenic overlooks.

The original one-half acre monument was established in 1913 to commemorate the discovery for Europeans by Juan Rodriguez Cabrillo of the west coast of what is now the United States. The purpose of the monument has expanded to include the preservation, restoration, and interpretation of natural and cultural resources within and adjacent to the monument, including the Old Point Loma Lighthouse, numerous defense structures dating back to World War I, extensive

tidepool areas, diverse vegetation communities and associated wildlife, and recreational and interpretive opportunities. The draft GMP states that:

The monument's Master Plan, approved in 1976, is general in scope and was written before urban growth in the San Diego area began to significantly affect monument operations. It does not guide management in dealing with the range of the cultural and natural resources now under Park Service care. Average annual visitation over the past 18 years is 1.5 million people. This use has resulted in increased impacts on resources. The primary planning concerns for Cabrillo National Monument relate to the increasing significance of the resources and increasing impacts of visitor use. Other issues involve areas adjacent to the monument managed by the City of San Diego, the Navy, or the Coast Guard.

The Draft GMP describes four alternatives for management of the monument, including the proposed plan and a no action alternative. Common to all four alternatives are: (1) management approaches to monument boundaries (existing and potential additions of surplus Navy lands), management zones (development, historic, special use, and natural), commemoration (Juan Rodriguez Cabrillo is the primary interpretive theme), and protection of scenic views; and (2) planning objectives for resource management, visitor use, and monument operations.

The proposed management plan calls for additions to monument facilities and staff to more adequately protect natural and cultural resources (primarily tidepools, coastal sage scrub habitat, and historic defense structures) and to provide a broader range of visitor choices and interpretive opportunities. The proposed plan, labeled Alternative B in the draft General Management Plan/Environmental Impact Statement, was developed by the NPS through an evaluation of several alternative management and development plans. The following is a summary of the proposed plan:

- \* Entrance Station: A new entrance station would be built north of the intersection of Cabrillo Memorial Drive (Route 209) and Cabrillo Road, in order to provide a better orientation to the monument, include the tidepools and western part of the monument in the visitors' perception of the monument, and allow entrance fees to be collected from those who use the tidepools (Exhibit 4).
- \* Tidepool Area: Using a baseline study to be completed in late 1995, NPS would continue to monitor the tidepools and would manage the area to limit peak visitor use as warranted by the baseline study and as necessary to reduce visitor impacts. Possible management strategies include charging for entry, designating paths in tidepools, rotating tidepool access to allow for recovery, limiting use to one area, increasing ranger presence, restricting access to only escorted ranger-guided tours, closing parking areas, and closing the tidepools for defined periods of time.

An intertidal interpretive center would be developed at the Navy Marine Sciences Facility, if the Navy declares this facility excess to its needs and if it is transferred to the monument. A new parking area would be constructed at the facility and the existing tidepool parking lot would be removed and restored to native habitat.

- \* Visitor Center: An improved and expanded outdoor seating area at the Ballast View rest area would be built, and a new building would be built adjacent to the existing administrative building to house resource management, visitor protection, and fee collection activities (Exhibit 5).
- \* Whale Overlook: The existing structure would be removed and a new structure built to provide sheltered, unobstructed viewing space; additional open viewing platforms would be constructed on either side of the structure (Exhibit 6).
- \* Old Lighthouse: A 1000 square-foot interpretive building would be constructed adjacent to the lighthouse on the footprint of the old assistant lightkeeper's quarters. The developed area around the lighthouse (including roads, fencing, and landscaping) would be modified to reflect the historic 1880s period and to improve access for the mobility impaired (Exhibit 7).
- \* Old Maintenance Site: A 1150 square-foot storage building would be constructed at the old maintenance site (adjacent to an existing maintenance building) for the monument's museum collection and the Cabrillo Historic Society (Exhibit 8).
- \* Trail Plan: The Bayside Trail, which now ends at the boundary between the monument and the Naval Submarine Base, would be extended up to the monument's main parking area to create a loop trail. This project would not be implemented until access easements are made between the Navy and NPS. In addition, the plan calls for linking appropriate points of interest in a trail system, and eliminating and revegetating numerous social [i.e., informal] trails that have developed over time (Exhibit 9).
- \* Military Structures: An inventory and assessment of historic military structures would be completed. Safe structures would be restored and opened to the public by adding signs and interpretive exhibits.

II. Staff Note/Procedures. The regulations implementing the Coastal Zone Management Act (CZMA) provide for phased federal consistency review in cases where federal decisions to implement an activity are also made in phases. Section 930.37(c) of those regulations states:

... in cases where major Federal decisions related to a proposed development project will be made in phases based upon developing information, with each subsequent phase subject to Federal agency discretion to implement alternative decisions upon such information (e.g., planning, siting, and design decisions), a consistency determination will be required for each major decision. [15 C.F.R. Section 930.37(c)]

In the draft GMP the National Park Service explains that a GMP provides a blueprint to guide park management decisions and offers strategies for addressing issues and achieving identified management objectives over a 10- to 15-year period. Strategies include programs, actions, and support facilities

necessary for proper management of park resources, appropriate visitor use, interpretation of resources, and efficient park operation. A development concept plan (DCP) amplifies development decisions made in a GMP for a specified developed area. It is an intermediate step between a GMP and specific design and construction drawings. For established parks with existing development, such as Cabrillo N.M., DCPs are included in the GMP.

Thus, the Park Service's consistency determination is for a document generally describing the management goals and overall development plans for Cabrillo N.M. Because many of the activities identified in the management plan are still at the conceptual stage, additional Commission consistency review will be required after completion of final project-specific plans and supporting environmental documents, a procedure which the NPS has agreed to. As a result, the Commission's analysis of the consistency determination for the draft GMP includes identification of those activities that could require additional consistency review.

Historically when the Commission has reviewed these types of conceptual or management plans, the Commission's usual practice has been to review the plan at a general level, noting potential problem areas and projects which would be likely to affect the coastal zone if built. For these projects additional consistency determinations will be necessary. The Commission has found this approach to be a practical one, since: (1) it provides the Park Service in advance of specific project implementation notice of what issues are likely to arise under the California Coastal Management Program, and (2) it provides the Commission with an overall planning context within which to review specific projects subsequently proposed. The Commission can also ease its administrative burden by identifying at the General Management Plan stage those projects that do not affect the coastal zone or where effects are sufficiently minor to allow authorization through the negative determination procedure.

To that end, the Commission is informing the Park Service that consistency determinations or negative determinations may be required for any of the following specific projects which the Park Service intends to implement under the draft GMP:

1. Entrance Station Relocation
2. Tidepool Area Development
3. Visitor Center Administrative Building and Ballast View Rest Area
4. Whale Overlook Structure
5. Old Lighthouse Interpretive Building and Landscape Modifications
6. Old Maintenance Site Storage Building
7. Bayside Trail Loop Construction

To ease in the administrative burdens, the proposals/specific plans may be consolidated into a single (or groups of) consistency determination(s). Also, some of these proposals/specific plans may pose only minor issues and may be reviewed administratively through the negative determination process. The Park Service should continue to consult with the Commission staff on the most appropriate form for review. As will be further discussed below, the issues of greatest concern to the Commission at this time appear to be proposed development and management strategies at the tidepool area, relocation of the entrance station, and implementation of the trail plan.

III. Status of Local Coastal Program. The standard of review for federal consistency determinations is the policies of Chapter 3 of the Coastal Act, and not the Local Coastal Program (LCP) of the affected area. If the LCP has been certified by the Commission and incorporated into the CCMP, it can provide guidance in applying Chapter 3 policies in light of local circumstances. If the LCP has not been incorporated into the CCMP, it cannot be used to guide the Commission's decision, but it can be used as background information. The City of San Diego LCP has been incorporated into the CCMP.

IV. Federal Agency's Consistency Determination. The National Park Service has determined the plan to be consistent to the maximum extent practicable with the California Coastal Management Program.

V. Staff Recommendation:

The staff recommends that the Commission adopt the following resolution:

A. Concurrence.

The Commission hereby concurs with the consistency determination made by the National Park Service for the draft General Management Plan, finding that the plan is consistent to the maximum extent practicable with the California Coastal Management Program.

VI. Findings and Declarations:

The Commission finds and declares as follows:

A. Public Access and Recreation. The Coastal Act provides:

Section 30210. In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211. Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212.

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

(1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,

(2) adequate access exists nearby, or,

(3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway....

Section 30213. Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30220. Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Section 30221. Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Section 30223. Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

The NPS states in the draft GMP that:

The primary planning concerns for Cabrillo National Monument relate to the increasing significance of the resources and increasing impact of visitor use.

The GMP outlines the following planning concerns regarding visitor use at the monument:

- \* Because of the current location of the entrance station, visitors enter the monument and visit its tidepool area without paying the entrance fee, and may not understand that the tidepools are a part of the monument.
- \* The tidepools are a fragile yet popular resource in need of adequate protection from poaching, pollution, trampling, and other disturbance.
- \* Although many historic coastal defense structures are near existing paths and of considerable public interest, public access and interpretation are currently quite limited.
- \* The Old Point Loma Lighthouse exists in a historically inaccurate landscape setting, interpretation is limited by a lack of space to display and explain historical objects, and the structure is not accessible to the mobility impaired.
- \* The monument lacks a suitable outdoor facility for ranger-guided group programs and other activities which are an integral part of the monument's interpretive and community programs.

- \* The existing Whale Overlook is too small to accommodate the growing number of visitors who use it, the structure does not fit with the site topography, and its design does not fit with the architectural theme of the visitor center.
- \* Increasing visitor use has led to the establishment of numerous social trails which channel runoff, cause soil erosion, and damage plants.

The NPS believes that the proposed plan adequately addresses these issues, meets visitor experience objectives, and protects and restores natural and cultural resources. The NPS states in its consistency determination that:

Currently the public can visit the shoreline and tidepools without passing the [monument] entrance station. Since the tidepools are among the best-preserved in the southern California area, they are a popular attraction. However, they are a fragile resource, impacted by excessive visitor use (pp.84-85). The Proposal intends to manage public access to protect resources. As part of that intent, the Proposal includes the relocation of the entrance station so that those visiting the tidepools will pass through the entrance station and become aware that the tidepools are a part of the monument. This step would include tidepool visitors in the fee collection process.

Our analysis suggests that fee collection will not unduly restrict public access. The park entry fee of \$4 per vehicle includes a seven-day pass. An annual pass costs \$10. In nearby shoreline areas, parking meters cost \$1 per hour with a two hour limit. State and local public facilities also charge entry or parking fees. The fee to enter Cabrillo National Monument is an entrance fee to all areas within the monument which covers an equivalent of four hours at a parking fee site and can be used at no additional cost for seven days.

The Proposal suggests other methods of managing visitor use to protect the tidepools (p.26). Any new strategy to limit peak visitor use would be tested against the results of the 5-year baseline study to determine if the approach increased protection of the tidepool ecosystem.

The proposal also includes development of an intertidal interpretive center in facilities currently owned and used by the U.S. Navy (p.26). One intent of developing the interpretive center would be to more effectively introduce visitors to the fragile nature of the intertidal area before they enter the tidepool area. Should these facilities become excess to the Navy and the NPS were able to implement this plan, a consistency determination would be prepared for that specific development.

The NPS concluded that the proposed plan is consistent with the public access and recreation policies of the Coastal Act.

The Commission believes that the relocation of the entrance station and potential management strategies and development at the tidepool area are GMP elements that carry the potential to adversely affect public access to and recreational use of the monument. At the same time, however, the Commission



acknowledges that these plan components also may be necessary to protect natural and cultural resources from damage due to increasing visitor use at the monument. The Commission believes that the NPS has, at this GMP stage of its planning process, adequately addressed the need for the relocation of the entrance station in order to bring the shoreline areas of the monument into the visitor's perception of the geographical extent of the monument, and the need to better manage visitor use of the tidepool area to protect fragile marine resources from damage. However, the Commission finds that before it can determine that the entrance station and tidepool area developments (as proposed in the draft GMP and outlined in the subject consistency determination) are fully consistent with the public access and recreation policies of the Coastal Act, a greater level of detail regarding those development projects and their potential coastal zone effects must be provided by the NPS.

To that end, the Commission notes that it will have the opportunity to evaluate detailed plans for construction of a new entrance station, construction of interpretive facilities at the tidepool area, and implementation of visitor management strategies at the tidepool that would affect public access to and recreational use of this area of the monument, in the review of subsequent consistency determinations for these plan components that will be submitted by the NPS. The Commission also notes that the NPS' overall strategy is to enhance recreation and protect fragile coastal resources. The Commission therefore finds that the proposed GMP, with the NPS commitment to subsequent consistency reviews of GMP components (in particular, the entrance station relocation and tidepool management plans), is consistent with the public access and recreation policies of the California Coastal Management Program (CCMP)(Sections 30210-30213 and 30220-30223 of the Coastal Act).

B. Public Views. The Coastal Act provides:

Section 30251. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The Draft General Management Plan (GMP) states that:

Cabrillo National Monument is located in San Diego, California, on the southern end of Point Loma, a narrow, six-mile long peninsula at the entrance to San Diego Bay. From its 420-foot elevation, the monument offers a commanding view of San Diego and its bay and adjacent cities to the north, east, and south; Mexico to the far south; and the Pacific Ocean to the west.

Within the monument are numerous developed sites accessible by roads and/or trails that provide the public with expansive views of the coastal region and views of the monument's various historic and cultural features. The visitor center, Ballast View rest area, the old lighthouse, Whale Overlook, and the tidepool area are the primary scenic viewpoints used by the public and each of these sites is to be renovated and/or improved by development proposed in the GMP. Proposed development at these sites is designed to improve opportunities for public enjoyment of the scenic views to and from the monument. The GMP states that all proposed facilities and structures would adhere to a specific set of guidelines based on the architectural theme of the existing visitor center, that proposed development would be sited where facilities currently exist or in previously disturbed areas, and that no natural areas would be disturbed except along the alignment of the Bayside Trail loop segment.

The Commission agrees with the NPS that the proposed facilities at Cabrillo N.M., as conceptually outlined in the draft GMP, would preserve and enhance the monument's scenic resources. The draft GMP is conceptual at this time, and the Commission will have the opportunity to evaluate subsequent development plans that may affect scenic coastal views. The Commission finds that the proposed General Management Plan is designed to protect views and be visually compatible with the character of the surrounding area. The Commission therefore finds that the Plan, with the NPS commitment to subsequent consistency reviews of GMP components, is consistent with the visual resource protection policies of the CCMP (Section 30251 of the Coastal Act).

C. Environmentally Sensitive Habitat. The Coastal Act provides:

Section 30230. Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30240.

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Two elements of the proposed GMP hold the potential to adversely affect environmentally sensitive habitat at the monument: implementation of the trail plan and development and management strategies at the tidepool area. In describing the environmental consequences of the proposed Bayside Trail extension, the GMP states that:

A defined trail, especially along the coastal bluff, would provide opportunities to revegetate social trails and to increase the amount of native coastal sage scrub habitat. Removal of social trails along the coastal bluff would also enhance the views toward the ocean from the upper portions of the monument.

Construction of an extension to the Bayside Trail making it a loop trail would enhance the visitors' recreational experience and provide access to excellent views. Construction of a Bayside Trail loop would temporarily expose approximately 8400 square feet of soil to erosion by removing coastal sage scrub vegetation. An approximate 2100 foot linear corridor, varying in width from three feet to seven and one-half feet wide (including back slope, trail bench, and fill slope), would be opened to soil erosion and invasion of exotic plant species. The back and fill slopes would be revegetated with native plant materials removed during construction, leaving a generally 2-foot wide trail. Over the long term, about 4200 square feet, the trail tread itself, would be exposed. Potential erosion would be mitigated through selection of a steady, straight grade rather than switchback design, gaining almost all changes in grade with steps, and installation of a drainage system. Effects on wildlife would be expected to be minimal.

In describing the environmental consequences of potential tidepool management strategies and facility development, the GMP states that:

Tidepool monitoring using the baseline study [to be completed in late 1995] would continue. Management strategies designed to reduce the negative effects of trampling, collecting, and rock turning would be implemented and the results compared to the information in the baseline study to determine which were successful in eliminating or reducing loss of plant and animal life.

Development of an intertidal interpretive center in one of the buildings within the Navy Marine Sciences Facility (if declared excess by the Navy) would ensure that all tidepool visitors received an orientation to the fragility of the tidepool ecosystem before entering the tidepools. Visitor use would be more easily monitored and paced to prevent the adverse impacts associated with peak visitor use. This development would also allow the removal and revegetation of the existing tidepool parking lot, adding approximately one-half acre of coastal sage scrub habitat to the monument.

With the potential of this alternative to limit peak visitor use of the tidepools, visitors may be required to plan their tidepool visits more carefully. Unrestricted access to the tidepools would no longer be certain. However, better visitor education about and orientation to the fragility of the resource and the opportunity to experience the tidepools with less crowding may lead to enhanced enjoyment of tidepool life.

The NPS concluded that the proposed plan is consistent with the environmentally sensitive habitat policies of the Coastal Act.

The Commission acknowledges that extending the Bayside Trail to make it a loop trail would be a positive benefit for visitors to the monument, but at the same time would require the elimination of sensitive coastal sage scrub habitat. The NPS also proposes to eliminate numerous social trails within the monument and restore those areas to coastal sage scrub habitat. As a result, there appears to be a basis for developing a mitigation program for the loss of coastal sage scrub habitat within the larger context of the General Management Plan. The Commission believes that the NPS has, at this GMP stage of its planning process, designed a trail plan that appears to be consistent with the environmentally sensitive habitat policies of the Coastal Act. However, the Commission additionally finds that before it can determine that the proposed trail plan and resulting loss of native plant habitat are fully consistent with those Coastal Act policies, a greater level of detail regarding this plan, its potential coastal zone effects, and the proposed mitigation for those effects must be provided by the NPS.

Regarding the tidepool area of the monument, the Commission acknowledges the NPS' concerns that visitor overuse may be generating adverse effects on marine resources in the intertidal zone, and that new visitor and resource management efforts may be necessary to protect those resources from permanent damage. The GMP discusses several management strategies that could be implemented in conjunction with the results of a soon-to-be-completed five-year baseline study on tidepool resources. The Commission understands the conflict between providing for and allowing public access to the shoreline while at the same time protecting sensitive shoreline resources. The GMP and consistency determination provide only a brief examination of the public access/resource protection conflict which exists at the tidepool area, and do not include a sufficient level of detail on how this conflict will be managed to allow the Commission to find at this time that any or all of the strategies being considered are consistent with the environmentally sensitive habitat policies of the Coastal Act. However, the Commission does find that a resource/access conflict exists at the tidepool area and that appropriate solutions to that conflict are outlined in the proposed GMP. When a more refined management strategy for this area is completed by the NPS, the Commission will then be able to review that detailed plan for consistency with the applicable resource policies of the Coastal Act.

To that end, the Commission notes that it will have the opportunity to evaluate a more developed and detailed trail plan and tidepool area development and management plan, in the review of subsequent consistency determinations for General Management Plan (GMP) components that will be

submitted by the NPS. The Commission therefore finds that the proposed GMP, with the NPS commitment to subsequent consistency reviews of GMP components (in particular, trail and tidepool plans), is consistent with the environmentally sensitive habitat policies of the CCMP (Sections 30230, 30231, and 30240 of the Coastal Act).

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PURPOSE AND NEED FOR THE PLAN

Map 1: Regional Map and Point Loma Land Use

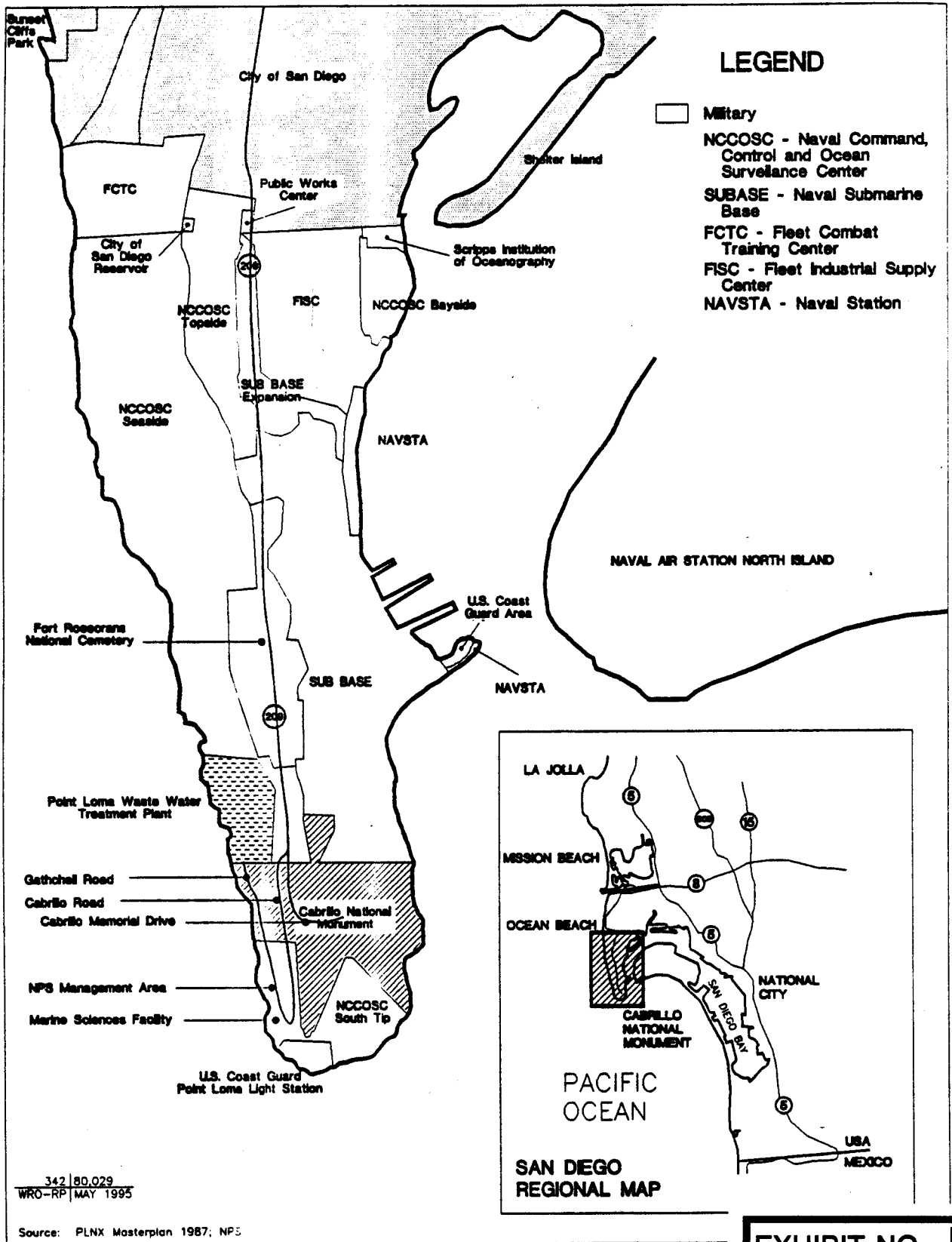


EXHIBIT NO. 1

APPLICATION NO.

CD-105-95

# MAP 2: FACILITIES AT Cabrillo National Monument

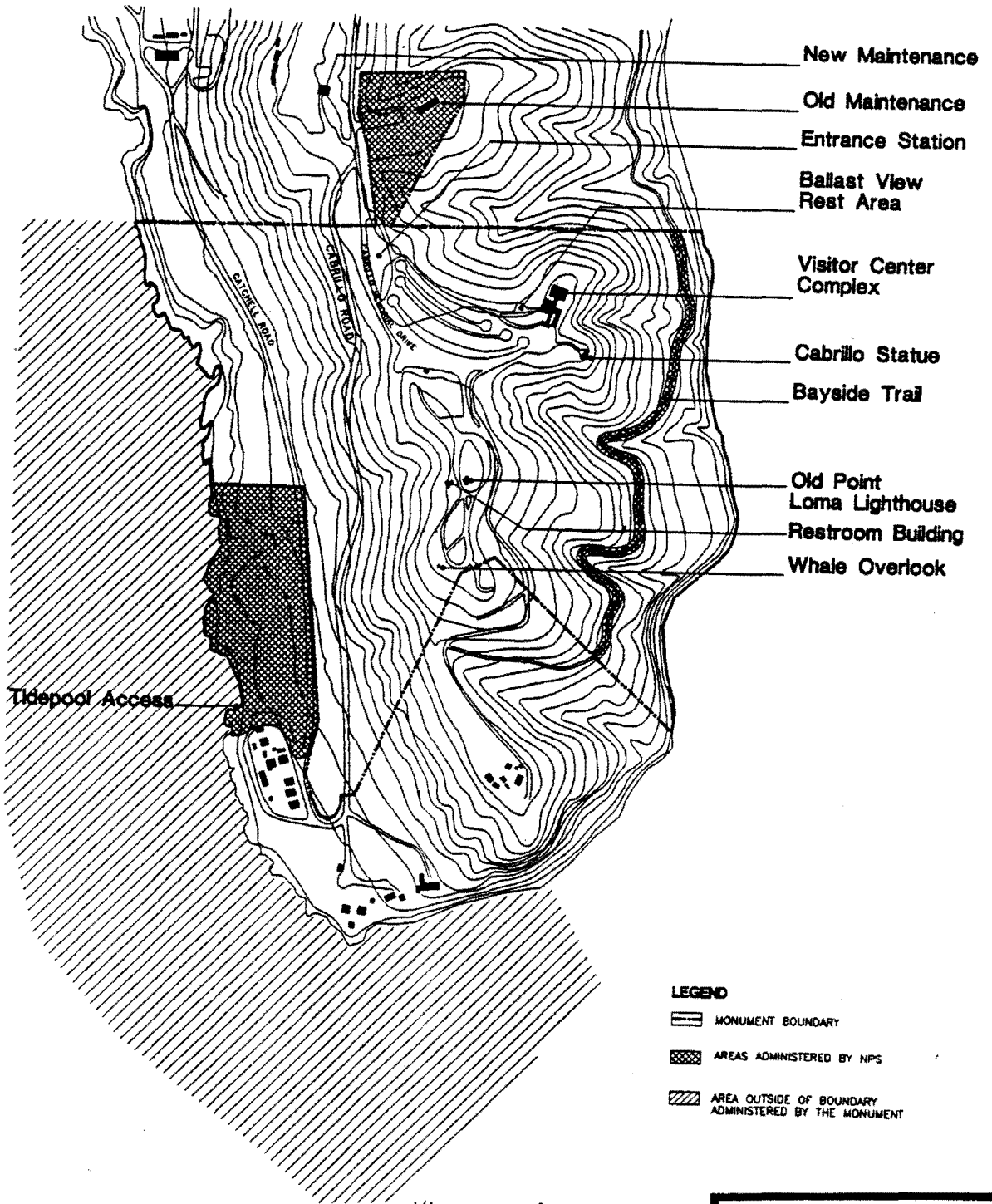


EXHIBIT NO. 2
APPLICATION NO.
CD-105-95
California Coastal Commission

# MAP 6: ALTERNATIVE B, THE PROPOSAL Cabrillo National Monument

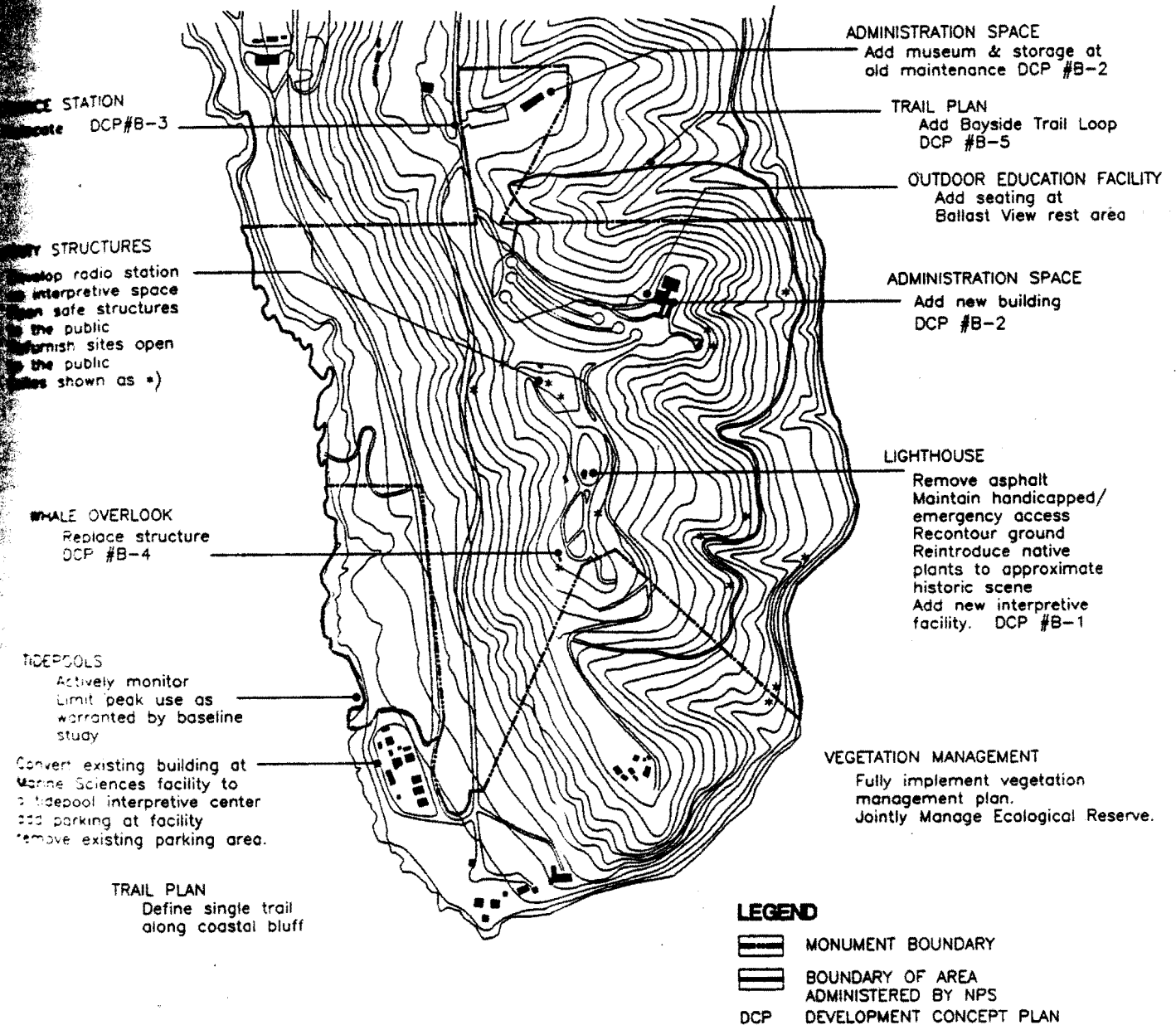
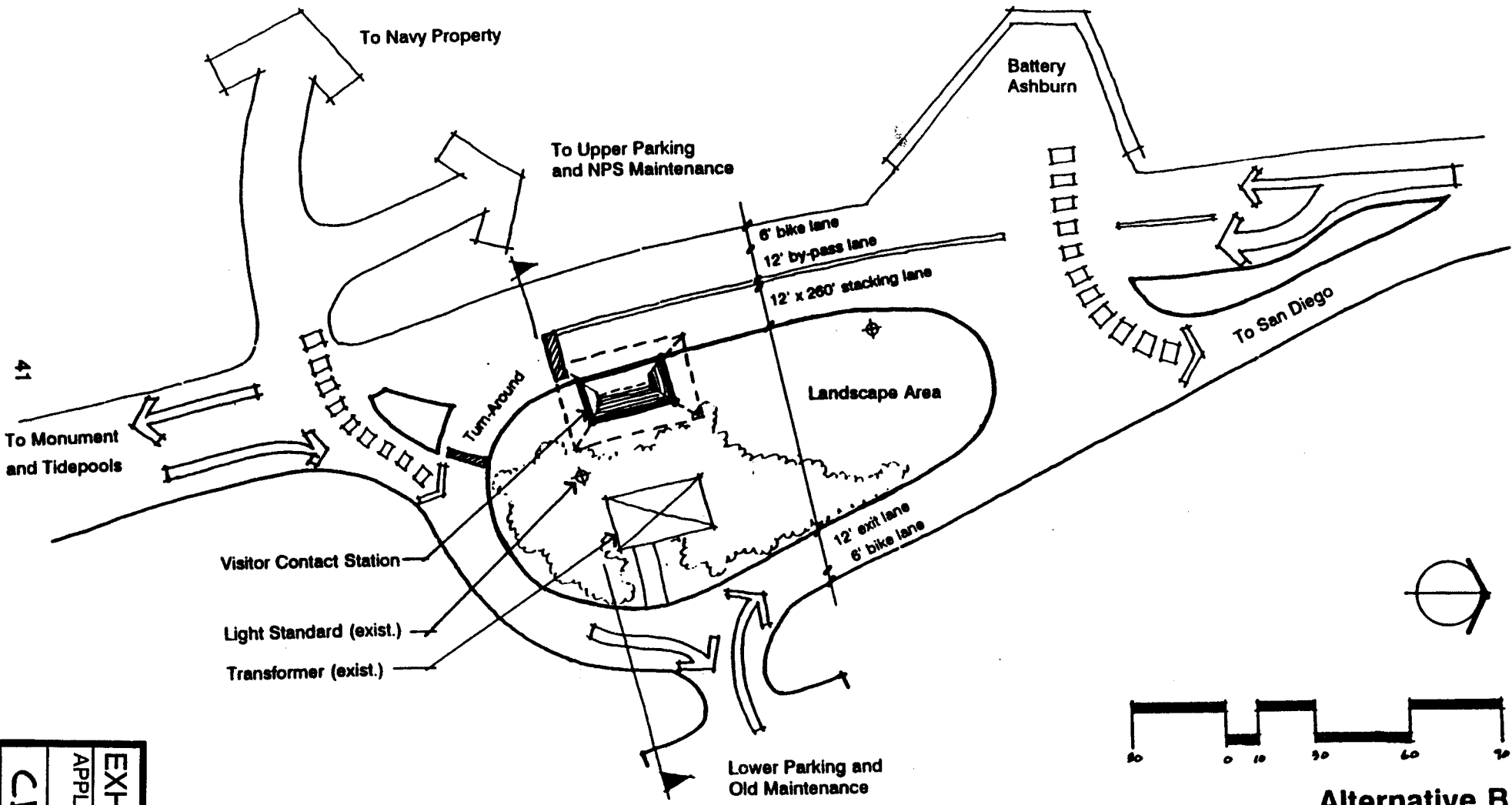


EXHIBIT NO. 3  
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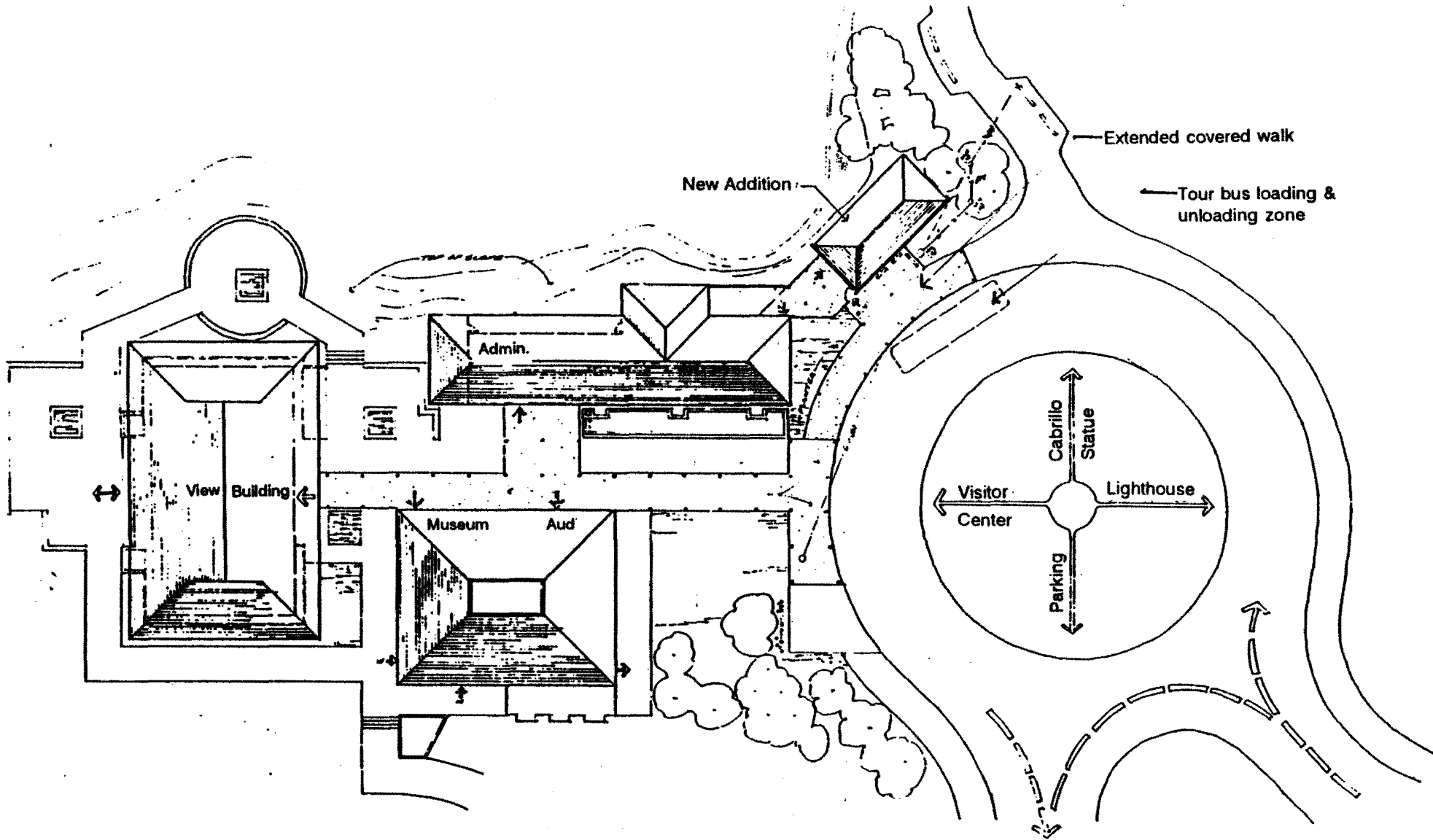




**Alternative B**  
**Development Concept Plan 3**  
**ENTRANCE STATION RELOCATION:**  
**Site Plan**

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 California Coastal Commission	<b>CD-105-95</b>
	<b>EXHIBIT NO. 4</b> APPLICATION NO.

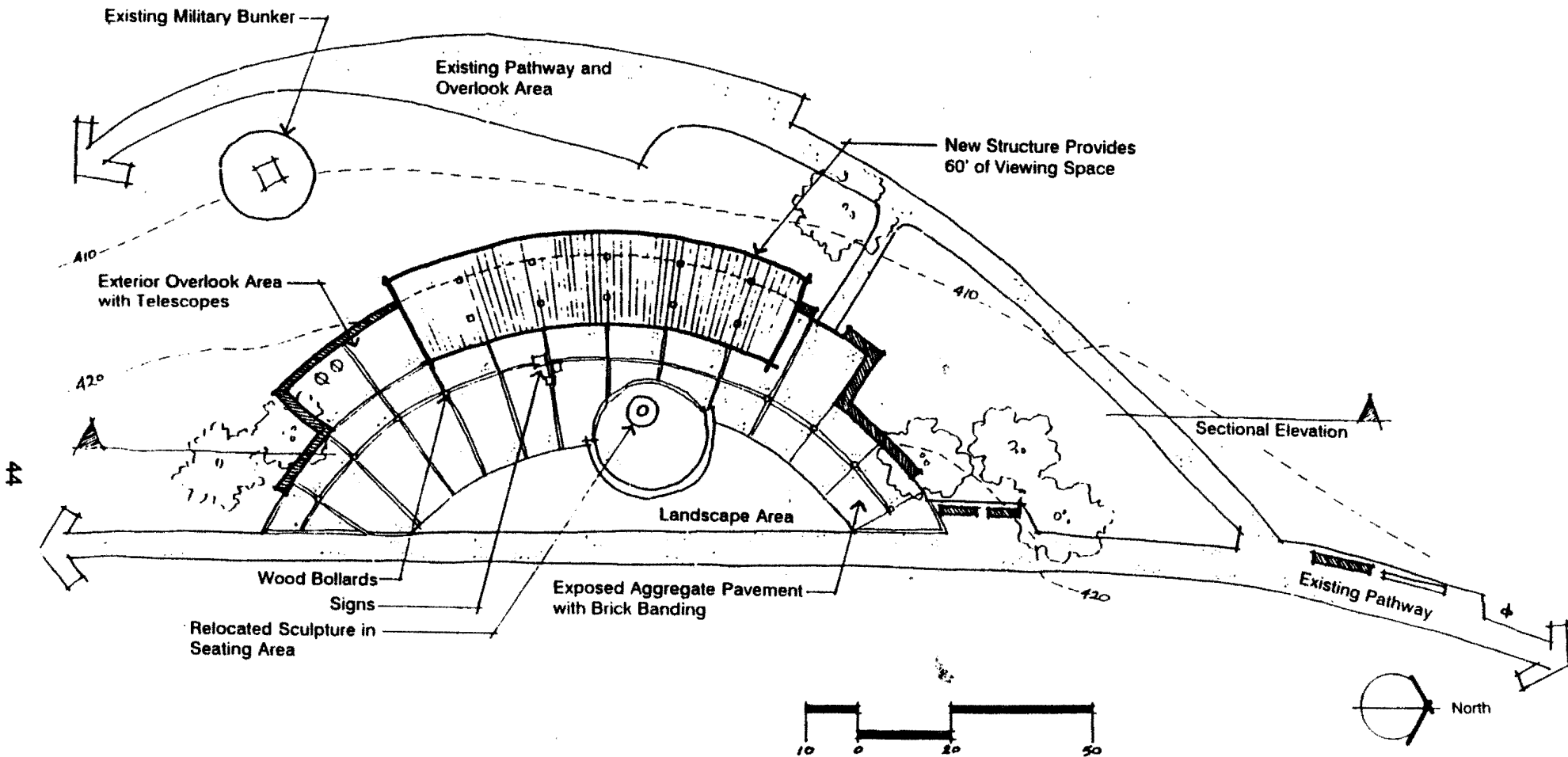


**VISITOR CENTER Alternative B**  
**Development Concept Plan 2**

ADMINISTRATION SPACE ADDITIONS

<p>California Coastal Commission</p>	<p>EXHIBIT NO. 5</p>
	<p>APPLICATION NO.</p>
	<p>CD-105-95</p>

Department of the Interior  
 BUREAU OF LAND MANAGEMENT



California Coastal Commission

CD-105-95

APPLICATION NO.

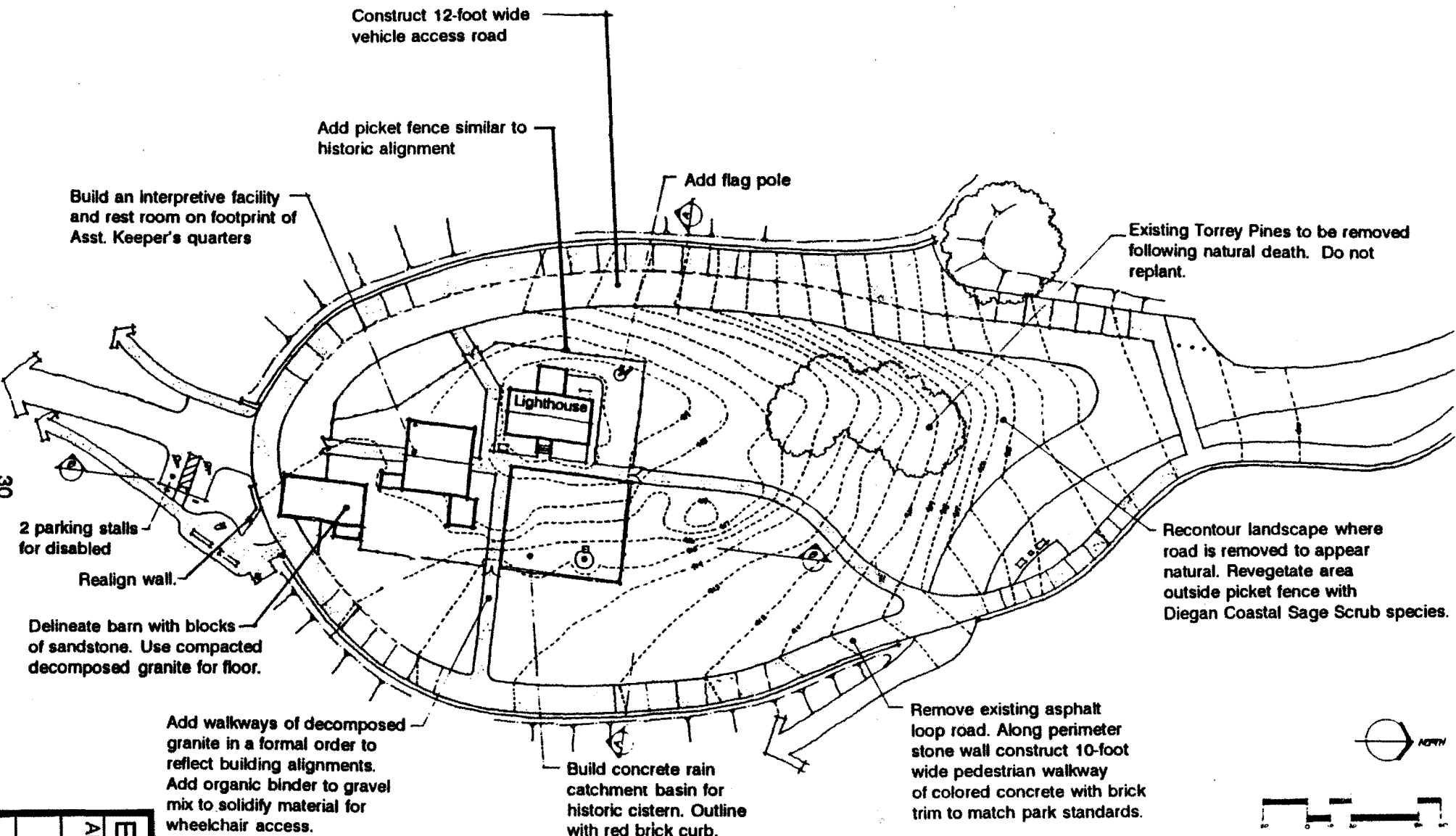
EXHIBIT NO. 6

Department of the Interior  
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National Monument

WHALE OVERLOOK

Alternative B  
 Development Concept Plan 4  
 WHALE OVERLOOK - Site Plan



**EXHIBIT NO. 7**  
**APPLICATION NO.**  
**CD-105-95**

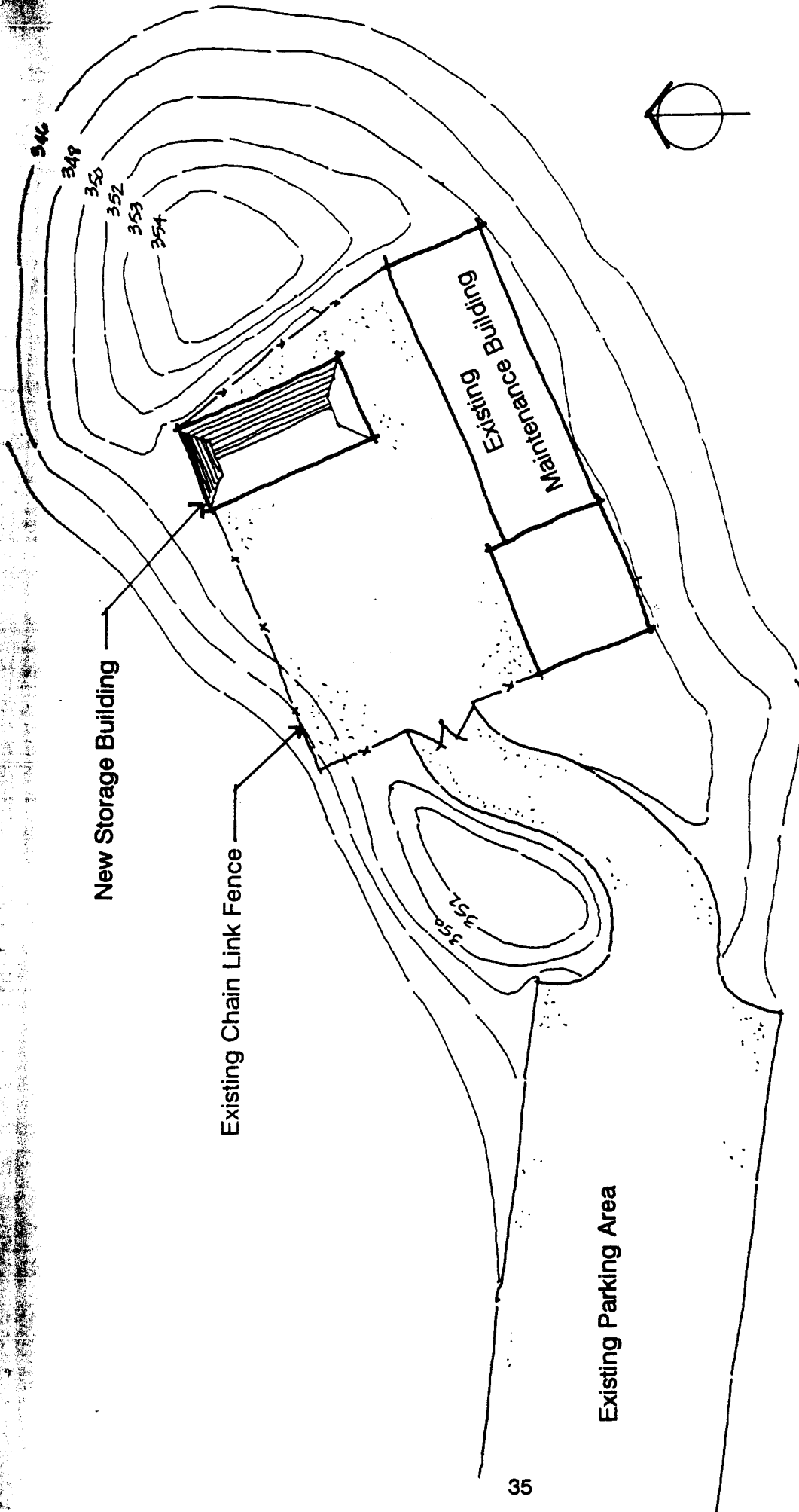
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National Monument

**OLD LIGHTHOUSE**

**Alternative B  
 Development Concept Plan 1**

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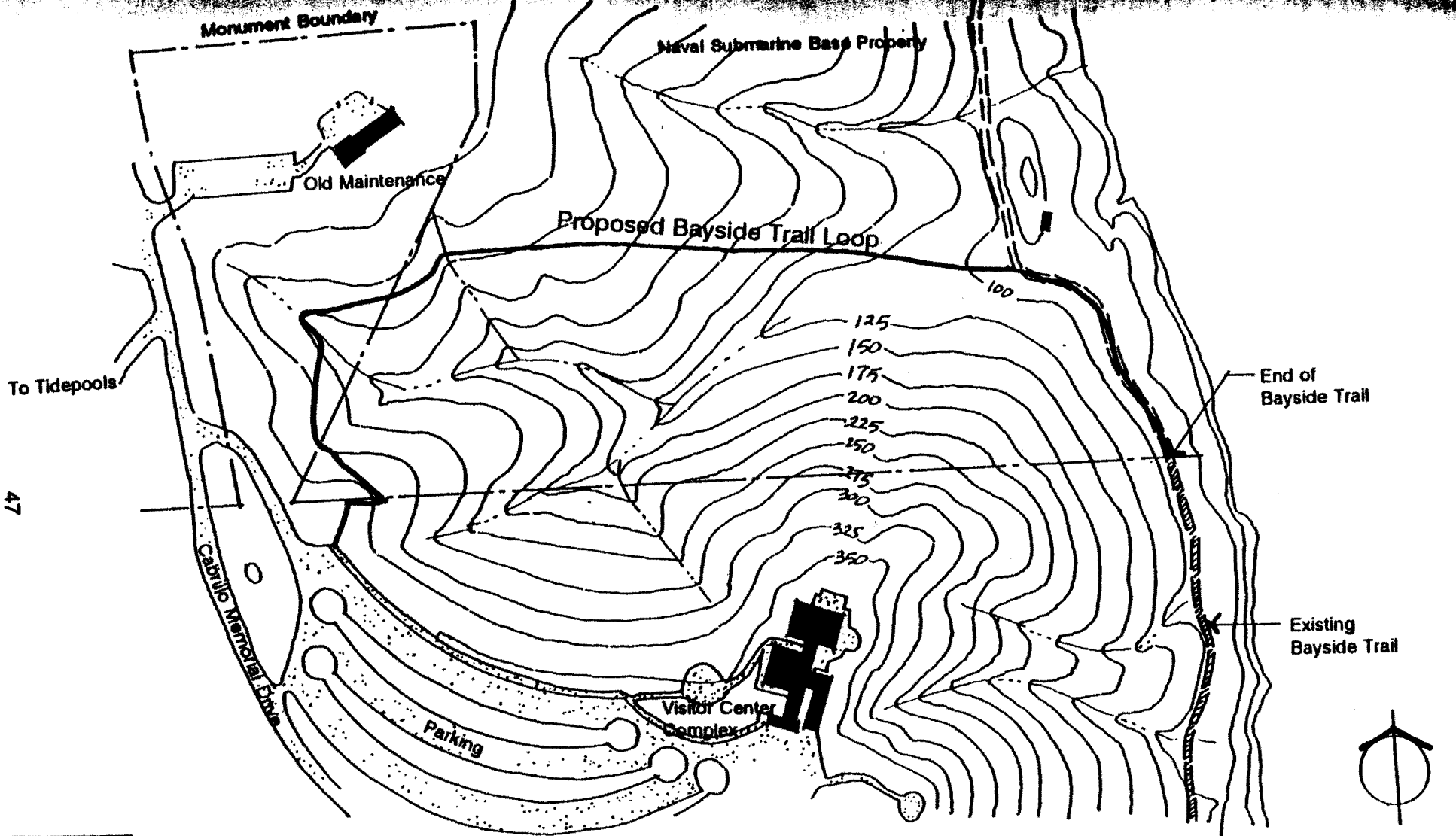
**Alternative B**  
**Development Concept Plan 2**  
**ADMINISTRATION SPACE ADDITIONS**  
**Storage Building: Site Plan**

ent of the Interior

139

**ational Monument**

<b>EXHIBIT NO. 8</b>
APPLICATION NO.
<b>CD-105-95</b>



To Tidepools

47

Monument Boundary

Naval Submarine Base Property

Old Maintenance

Proposed Bayside Trail Loop

100

125

150

175

200

225

250

275

300

325

350

End of Bayside Trail

Cabildo Memorial Drive

Parking

Visitor Center Complex

Existing Bayside Trail



NORTH

NO SCALE

 California Coastal Commission	<b>EXHIBIT NO. 9</b>
	APPLICATION NO.
	<b>CD-105-95</b>

of the Interior

ional Monument

**Alternative B**  
**Development Concept Plan 5**  
**BAYSIDE TRAIL LOOP: ALIGNMENT**