

CALIFORNIA COASTAL COMMISSION

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Staff Report and Recommendation on Consistency Determinations

Consistency Determinations No. CD-100-96
and CD-101-96

Staff: TNP-SF
File Date: 8/20/96
45th Day: 10/4/96
60th Day: 10/19/96
Commission Meeting: 10/8/96

Federal Agency:**U.S. Marine Corps**Development Location:

San Mateo Point, Camp Pendleton Marine Corps Base, southwest
of Interstate 5 off Cristianitos Road, northern San Diego County
(Exhibits 1-4)

Development Description:

CD-100-96: Construction of 120 duplex housing units for
officers, to be constructed in two phases (Exhibit 5).

CD-101-96: Construction of 76 duplex housing units for
officers (i.e. Phase 1 of CD-100-96 (Exhibit 5)).

Substantive File Documents:

1. "Final Conceptual Development Plan for San Mateo Point Marine Corps Base Company Grade Officer Housing, Camp Pendleton," Southwest Division, Naval Facilities Engineering Command, December, 1994.
2. "Statewide Interpretive Guidelines for View Protection," California Coastal Commission, May 3, 1977.
3. "Environmental Assessment for San Mateo Point Family Housing Marine Corps Base," Camp Pendleton, Department of the Navy, Southwest Division, March 1996.
4. "Marine Corps Base Camp Pendleton, California Master Plan, Volume 2, Area Plans," Department of the Navy, Western Division, August 1990.
4. "Final Environmental Assessment for FY 1990 Family Housing Marine Corps Base Camp Pendleton, California," Department of the Navy, Southwest Division, September 1990.
5. "San Onofre State Beach Revised General Plan," Department of Parks and Recreation, June 1984.
6. File for CD-50-95 (U.S. Marine Corps, San Mateo Point).

Staff Note: On August 14, 1996, the Commission objected to a consistency determination (CD-50-95) for the construction of 128 officer units at San Mateo Point, based on adverse impacts to visual resources and recreational opportunities at San Onofre State Beach. The Marine Corps has revised the proposed project and submitted two separate consistency determinations. CD-100-96 includes 120 officer units at San Mateo Point, to be constructed in two phases. CD-101-96 includes 76 units at San Mateo Point, representing just Phase 1 of the full project. However, the Marine Corps has stated that it will submit a separate consistency determination for Phase 2 of CD-101-96 at some future date; therefore, the analysis of the project must include both Phase 1 and the expected cumulative impacts from Phase 2. As a result, Commission staff believes the analysis for both consistency determinations is substantially the same, and has combined the analysis for both projects into one staff report.

Since the last Commission action on CD-50-95, the Commission staff has met again with the Marine Corps, toured most of Camp Pendleton, reviewed the revised proposal at San Mateo Point, and further refined its analysis of available alternatives. While the Marine Corps has modified the project and has elaborated on its position that some of the previously identified alternatives are not feasible for the proposed housing, the Commission staff continues to believe that the project will adversely affect visual resources and recreational opportunities, and that alternative sites are available for the housing. Staff is therefore recommending the Commission object to both consistency determinations.

Executive Summary

On August 20, 1996, the Commission received two consistency determinations from the U.S. Marine Corps for construction of officer housing at San Mateo Point, Camp Pendleton. CD-100-96 proposes 120 duplex units; CD-101-96 proposes 76 duplex units. (As described in the above staff note, because they are essentially the same project, they will be analyzed in this report as one project.) The project is located adjacent to San Onofre State Beach, the popular "Trestles" surfing area, and near San Clemente State Beach. Coastal issues raised by the project include: visual and recreational impacts, impacts on sensitive resources and water quality at San Mateo Creek, stability of the site, effects on public access, and impacts to archeological resources.

The proposed project is inconsistent with the visual and recreational policies of the Coastal Act (Sections 30251, 30213, 30221, and 30240) because it involves encroachment of new residential development into a viewshed which is now undeveloped. Development of the proposed site will be visible from the beach area downcoast from the project site, and will significantly degrade the visual character and recreational experience on San Onofre State Beach. This State Beach is a heavily used recreation area and includes a world-renowned surfing area. The Commission believes that there are feasible alternative sites for the proposed project which would lessen or avoid impacts to coastal zone resources. Thus, the project's impacts have not been minimized and, for this reason, the project is inconsistent with the visual and recreation policies of the CCMP.

The project site is adjacent to a coastal sage scrub slope, San Mateo Creek, and an 82 acre wetland reserve, which support several federally listed species. The proposed project has the potential to negatively affect these sensitive habitat areas and listed species. The Marine Corps has mitigated many potential impacts to the habitat through a number of commitments. However, the Marine Corps also proposes to screen the proposed housing using a number of species which are invasive. These species could spread, negatively impacting the sensitive coastal sage scrub adjacent to the site and wetland habitats downslope. This habitat issue is probably resolvable through project modifications, such as a change in species to use only non-invasive and/or native species. However, as currently proposed, the project is not consistent with the environmentally sensitive habitat protection policy of the Coastal Act (Section 30240).

Based on commitments made by the Marine Corps, the project is consistent with the water quality provision of the Coastal Act (Section 32031). The project will not block public access and is thus consistent with the public access policies (Sections 30210-30212) of the Coastal Act. The project is also consistent with the archeological resources policy (Section 30244) and the geologic stability policy (Section 30253) of the Coastal Act.

Staff Summary and Recommendation:

1. Staff Summary:

A. Project Description: **CD-100-96:** The U.S. Marine Corps proposes to construct 120 units for officer housing at San Mateo Point on Camp Pendleton. Currently, only Phase 1 of the project, 76 units (38 duplex buildings), has assured funding (Exhibit 5). These units are planned for the northern portion of the site. Construction of Phase 2 (44 units) is not scheduled at this time due to a lack of funding. The schedule for appropriating funding for Phase 2 of the project is unknown. Nevertheless, the Marine Corps has analyzed its effects and seeks authorization for both phases in this consistency determination.

CD-101-96: The U.S. Marine Corps proposes to construct 76 units (Phase 1) for officer housing at San Mateo Point on Camp Pendleton. These units are planned for the northern-most portion of the site. The Marine Corps would submit a separate consistency determination at some future date for Phase 2 of the project.

The project location for both consistency determinations is a blufftop site, on the west side of Highway one, southwest of Interstate 5 (I-5) off Cristianitos Road in northern San Diego County (Exhibits 1-4). The project site is located just inland of and above San Onofre State Beach. The project location encompasses approximately 40 acres. Under **CD-100-96** (120 proposed units), approximately 31.5 acres would be developed. Under **CD-101-96** (76 units), approximately 19.5 acres will be developed. However, when combined with the expected Phase 2 housing units, 31.5 acres would be developed.

The majority of the site is relatively flat; however, a bluff with slopes in excess of 25% is adjacent to the southeastern edge of the site, descending into San Mateo Creek. This slope area,

approximately 8 acres, will be retained as open space in its natural condition. The southern end of the site also is bordered by a bluff. For either project, the Marine Corps has incorporated a 100 foot buffer between the housing development and the southeastern slope adjacent to the project site; structures will not be placed within this buffer area. The buffer will be mowed periodically to maintain a fire break for the development. Precise plans for the buffer have not been provided. Under full buildout (Phase 1 and Phase 2), the project includes a 600 foot setback from the southern bluff edge at the ocean side of the property.

The site currently contains several structures which were once used by the Coast Guard. These structures, proposed for removal under either proposal, include several unoccupied residences, several storage sheds, and a helicopter landing pad. The Coast Guard now retains ownership of approximately 0.4 acres in the southwestern tip of the site for a navigational aid (Loran) station. The Loran station will remain on the site under the proposed project.

The proposed projects may include construction of a sewage line following the northeastern side of the project site, and extending southward along old Highway 101, crossing to the east side of Interstate 5, north of Beach Club Road (Exhibit 6). The corridor will intercept with Camp Pendleton's sewer main at Basilone Road. This sewer line will be constructed if the Marine Corps determines that it is not economically viable to connect the project to the City of San Clemente's sewer services.

San Onofre State Beach is located to the southeast of the site. The park consists of 2,019 acres, with 7 miles of ocean frontage. The State Park includes the mouth of San Mateo Creek and an 82 acre wetland preserve, both of which lie adjacent to and southeast of the project site. A public vertical access trail leads from inland areas to the beach; the accessway initially parallels the northern edge of the project site, and then follows below the southeastern edge, along San Mateo Creek, to the beach. At the point where this access path turns to the beach, another bikepath/walkway continues east from the project site, roughly paralleling the beach and Interstate 5 (Exhibit 7).

Directly northwest of the site is a residential community located within the City of San Clemente. Access to the project site is from Cristianitos Road, which intersects the southerly end of Avenida del Presidente at the northern corner of the site. An overpass and access ramps provide direct access to Interstate-5.

The Marine Corps states the primary purpose of the proposed action is to provide company grade officer housing units on base to meet the existing demand for housing in the northern areas of the base. Currently, the demand for on-base family housing throughout Camp Pendleton exceeds the available supply, with waiting periods from seven to twelve months, depending on family size and grade of the service member.

B. Project History: On August 14, 1996, the Commission objected to a consistency determination (CD-50-95) for the construction of 128 officer units at San Mateo Point, based on adverse impacts to visual resources and recreational opportunities at San Onofre State Beach. The revised project differs from the CD-50-95 project in that eight units have been eliminated

from Phase 2 of the overall project, and the buffer from the southern end (i.e. ocean side) of the site to the first house has been increased by approximately 200 feet. The buffer between the southeastern slope and the proposed houses remains 100 feet. Phase I of the proposed project remains essentially the same as under CD-50-95.

C. 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 California Coastal Management Program (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 County of San Diego's LCP has been certified by the Commission, but the LCP has not been incorporated into the CCMP. The City of San Clemente's LCP has not been certified or incorporated into the CCMP.

D. Federal Agency's Consistency Determination: The U.S. Marine Corps has determined the project to be consistent to the maximum extent practicable with the California Coastal Management Program.

E. Applicable Legal Authorities: Section 307 of the Coastal Zone Management Act provides in part:

(c)(1)(A) Each Federal agency activity within or outside the coastal zone that affects any land or water use or natural resources of the coastal zone shall be carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved State management programs.

Federal consistency regulations (15 CFR Part 930) require the following information and analysis to be included in a consistency determination:

Section 930.39 Content of a consistency determination.

(a) The consistency determination shall include a brief statement indicating whether or not the proposed activity will be undertaken in a manner consistent to the maximum extent practicable with the management program. The statement must be based upon an evaluation of the relevant provisions of the management program. The consistency determination shall also include a detailed description of the activity, its associated facilities, and their coastal zone effects, and comprehensive data and information sufficient to support the Federal agency's consistency statement. The amount of detail in the statement evaluation, activity description and supporting information shall be commensurate with the expected effects of the activity on the coastal zone.

These regulations also provide:

Section 903.42 State Agency disagreement.

(a) In the event the State agency disagrees with the Federal agency's consistency determination, the State agency shall accompany its response to the Federal agency with its reasons for the disagreement and supporting information. The State agency response must describe (1) how the proposed activity will be inconsistent with specific elements of the management program, and (2) alternative measures (if they exist) which, if adopted by the Federal agency would allow the activity to proceed in a manner consistent to the maximum extent practicable with the management program.

(b) If the State agency's disagreement is based upon a finding that the Federal agency has failed to supply sufficient information (see Section 930.39(a)), the State agency's response must describe the nature of the information requested and the necessity of having such information to determine the consistency of the Federal activity with the management program.

F. Practicability: The federal consistency regulations provide:

Section 930.32 Consistent to the maximum extent practicable.

(a) The term "consistent to the maximum extent practicable" describes the requirement for Federal activities including development projects directly affecting the coastal zone of States with approved management programs to be fully consistent with such programs unless compliance is prohibited based upon the requirements of existing law applicable to the Federal agency's operations. If a Federal agency asserts that compliance with the management program is prohibited, it must clearly describe to the State agency the statutory provisions, legislative history, or other legal authority which limits the Federal agency's discretion to comply with the provisions of the management program.

Since no issue of practicability has been raised by the Marine Corps, the standard before the Commission is full consistency with the CCMP. The Marine Corps has not attempted to assert in this case that compliance with the CCMP is prohibited based upon the requirements of existing law applicable to its operations.

II. Staff Recommendation:

Staff recommends that the Commission adopt the following resolutions:

The Commission hereby objects to the consistency determination CD-100-96 made by the U.S. Marine Corps for both phases of the proposed project, finding that the project is not consistent to the maximum extent practicable with the California Coastal Management Program (CCMP).

The Commission also hereby objects to the consistency determination CD-100-96 made by the U.S. Marine Corps for the proposed project, finding that the Marine Corps's consistency determination does not contain sufficient information to enable the Commission to determine

whether the project is consistent to the maximum extent practicable with the enforceable policies of the CCMP.

The Commission hereby objects to the consistency determination CD-101-96 made by the U.S. Marine Corps for the first phase of the proposed project, finding that the project is not consistent with the California Coastal Management Program (CCMP).

The Commission also hereby objects to the consistency determination CD-101-96 made by the U.S. Marine Corps for the proposed project, finding that the Marine Corps's consistency determination does not contain sufficient information to enable the Commission to determine whether the project is consistent with the enforceable policies of the CCMP.

III. Findings and Declarations:

The Commission finds and declares as follows:

A. Visual Resources and Recreation: Section 30251 of the Coastal Act requires protection of visual resources. This section states, in part:

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. ...

The Commission has traditionally interpreted Section 30251 to focus on protection of public views.¹

Section 30213 states:

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

Section 30221 of the Coastal Act states:

Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or

¹ For example, the Commission's adopted statewide interpretive guidelines express the need to protect "ocean and coastal views from public areas such as highways, roads, beaches, parks, coastal trails and accessways, vista points, coastal streams and waters used for recreational purposes and other public preserves rather than coastal views from private residences where no public vistas are involved."

commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Section 30240 states, in part:

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

1. Visual Impacts and Recreational Character:

The proposed project is located on a scenic, predominately undeveloped bluff above San Onofre State Beach (Exhibit 8). The beach area, extending to the southeast of the project site, is a well used recreation area. Several popular and well-known surfing areas are located at the State Beach, including the famous "Trestles" surf spot. An estimated 300,000 number of visitors use the "Trestles" area of San Onofre State Beach annually. In addition, the public bikepath/walkway inland and parallel to the beach receives substantial use from bikers, hikers, and bird watchers.

In its findings for CD-50-95, the Commission found that the quality of the recreation at the beach area and accessways adjacent and downcoast from the proposed project site is directly tied to the visual character of the location. Much of the popularity of the area derives from the undeveloped nature of the area, the natural scenic views, and the healthy natural resources, all of which provide relief from the effects of urbanization. The Commission staff received numerous letters from the public for CD-50-95 indicating that the undeveloped character of the area is one of its major attractions for visitors.

Development of the site under either proposal will convert the site to a far more intensive use, with 120 duplex units at full buildout (i.e., both phases of the project). Most of the units will be two-story duplexes. The Marine Corps has taken efforts to blend the development with the site and with the overall character of residential development in San Clemente. The density of the proposed project will be approximately four units per acre, which is consistent with the existing residential development located directly to the west of the project site, in the City of San Clemente. In addition, the scale and design of the proposed development is similar to the residential units on the adjacent site to the north.

The Conceptual Development Plan for the original proposed project (CD-50-95) incorporated a landscaping plan, designed to be compatible with the existing residential area adjacent to the site (Exhibit 9). The Marine Corps has incorporated that landscaping plan into the current proposals. The Conceptual Development Plan states that:

a primary goal of the site landscape is to allow the new building development to blend in with the site as inconspicuously as possible. For this reason, the major common areas, green belts and open spaces will be planted with mostly evergreen canopy of large-growing trees. The intent is to give the site a "forested" character versus a "developed" character.

In the consistency determinations, the Marine Corps states:

This project has been conceived in a manner to retain existing ocean views from houses in adjacent neighborhoods, while protecting public views from the beach and Interstate 5. ... Views from the beach will be protected in a number of ways. A 100 foot buffer between the housing development and the top edge of the slope will be maintained. A 6 foot vinyl-clad fence separate the housing development and the buffer. Additionally, a comprehensive plan using drought resistant, non invasive, habitat compatible, [sic] landscaping and trees will be implemented. The Phase II planting program will be initiated at the same time as the Phase I program to create existing foliage screening when the Phase II units are constructed.

However, despite these efforts, due to its location, the projects as proposed will have significant adverse effects on public views from the public beach, the adjacent walkway and bikepath (shown on Exhibit 7), and from Interstate 5.

Although the proposed project is located adjacent to an existing residential development to the northwest, that development is not currently visible from the State Beach or the public walkway downcoast of the proposed project site. Thus, the proposed project will have significant effects on the visual quality of the area due to the introduction of new residential development into a scenic, predominately undeveloped area.

The Marine Corps disagrees with the characterization of the project impacts. In the Draft Environmental Assessment for the original project (CD-50-95), the Marine Corps states that the proposed project:

is not expected to result in significant visual impacts to the adjacent San Onofre Beach State park, contiguous beach areas, or to motorists in Interstate 5 or other public roadways. The site is situated in such a manner that views of the housing units from the beach would be unobtrusive due to both the distance involved and differences in elevation. Additionally, the view from the public beach access way is not anticipated to be significantly affected (pg. 4.8-8).

The Marine Corps has also stated that it believes it can adequately screen the development from views from the beach and "that in the event this vegetative screening planting were to fail, we will vigorously pursue the program until adequate full screening has been achieved from these views."

The Marine Corps has submitted several computer generated views of the proposed projects. The Marine Corps believes that the views confirm its ability to screen the development from view and has indicated that it expects the screening vegetation to be as high as 16-23 feet within five years.

The Commission disagrees with the Marine Corps' characterization of the visual impact as minimal and mitigable. The Commission is concerned over both the temporary adverse visual effect while the vegetative screening efforts are underway, as well as the ability to screen within

the time period stated by the Marine Corps. Several of the species proposed for use, although they may be fast growing, are inconsistent the Marine Corps' commitment (discussed in the habitat section below) to use native and/or non-invasive species. Use of appropriate species may slow or hinder visual screening efforts.

The Department of State Parks and Recreation shares the Commission's concerns. In comments on the Draft Environmental Assessment for the original project proposal (128 units), the Department expressed concerns over potential impacts to the visual and recreational character of the site (Exhibit 10). The general plan for San Onofre State Beach states that "[t]he scenic resources of San Onofre State Beach are of great importance (pg. 27)." To protect these resources, the Department states:

DPR believes this project will adversely impact the adjacent natural areas as well as degrade the open space experience on the nearby beaches. As such, it is our recommendation that a further evaluation of alternative sites be made and that the open space and recreational values of San Mateo Point be given serious consideration. This is predicated upon the limited coastal terrace areas remaining in open space, the adverse impact to a number of endangered species and habitat, and the apparently available opportunities for this type of project on the Base elsewhere.

The Department of State Parks and Recreation also shares the concerns over the Marine Corps proposed screening efforts (see Exhibit 15).

Because of the highly scenic nature of the project site and surrounding areas, and the fact that development of the site may affect views for thousands of visitors who annually use this beach and the public walkway paralleling the beach, the Commission is unable to find that the project has been designed to protect scenic public coastal views, to be visually compatible with the character of the surrounding area, or to protect the existing recreational use of the area. Further, even if only Phase 1 is developed as proposed under CD-101-96 both by itself and considering the cumulative effects from the anticipated Phase 2, the development will adversely affect the visual resources and recreational quality of the area. Therefore, the Commission finds that even Phase 1 will not protect scenic public coastal views, be visually compatible with the character of the surrounding area, or protect the existing recreational use of the area. Because either proposal will adversely affect the visual and recreational quality of the area, the Commission finds the project inconsistent with Sections 30251, 30213 and 30240 of the Coastal Act. Moreover, as described below (pg. 11-14), the Commission believes feasible alternatives are available which would fully avoid this adverse impact.

2. Oceanfront Land:

Section 30221 of the Coastal Act requires the preservation of ocean front land suitable for recreational use. Although there is presently no recreational use of the parcel that is the site of the Marine Corps' proposals, the lot is adjacent to a heavily-used recreational area. The project location makes it an ideal site for low-intensity recreational use that could enhance existing recreational values of San Onofre State Beach; such uses could include a small visitor center,

interpretive trail, and/or one or more ocean overlooks. Such uses could be designed to avoid visual intrusion on public views. Given the extreme scarcity of vacant recreationally usable land in Southern Orange County/Northern San Diego County, and the heavy existing demand for recreational facilities in the region, permanent, non-priority use development (i.e. the proposed development) would preclude this parcel from ever being used for complementary recreational facilities. The Commission finds that the Marine Corps' proposed development of the site would preclude its use for recreational purposes that would complement and enhance existing uses of the adjacent San Onofre State Beach, and, given evidence discussed below of the existence of alternative sites for the proposed project, that the project is therefore inconsistent with Section 30221 of the Act.

3. Alternatives:

The Marine Corps believes that development at San Mateo Point represents the least damaging feasible alternative for the proposed project. However, the Commission believes the Marine Corps has not adequately considered the impacts from the project on the visual resources and recreational opportunities; the project location is adjacent to a heavily used State Park, and in a relatively undeveloped, scenic area. As discussed above, development of the site would significantly affect the recreational values of the surrounding beach area. When these impacts are considered, it is not evident that development of San Mateo Point represents the least damaging alternative available.

Because of the impacts this project will have on public views and recreation, during its review of CD-50-95, the Commission staff requested additional information from the Marine Corps on alternative sites for construction of the project that could avoid these impacts. In addition, when it objected to CD-50-95, during the public hearing, the Commission directed the Marine Corps to take a closer look at both on-site reconfigurations, as well as alternative sites throughout the base.

Given that only Phase 1 of the project is funded, with no guarantee of funding for Phase 2, the Commission staff also specifically requested that possible sites that could accommodate Phase 1 of the project (76 units) be identified and analyzed. The Commission staff further requested that the analysis of alternatives include locations in both the northern and southern portions of Camp Pendleton.

In response to staff's request under CD-50-95, the Marine Corps stated that the:

[Draft Environmental Assessment] addressed all reasonable alternatives for the proposed action. As stated on page 3-1 of the Draft Review EA, due to rugged terrain in the northern portion of the base along with numerous live-fire ranges and maneuver areas, developable areas within the northern portion of MCB [Marine Corps Base] Camp Pendleton have been limited.

Although the Marine Corps has stated that the primary need for housing is in the north base, the Commission believes development of housing on the southern areas of the base is feasible and

meets the need of the Marine Corps for family housing. This analysis is based in part on a determination in a 1990 Marine Corps Final Environmental Assessment for housing at Camp Pendleton that development of housing in the south base "as an alternative to the preferred North Base site [San Mateo Point] would serve to reduce the current demand for company grade officer housing while maintaining an acceptable commute distance" (page 1-3 and 1-4).

In light of the apparent contradictions regarding the suitability of locating family housing in the south base, where environmental constraints tend to be less significant, the Commission is not convinced that housing in the northern areas of the base represent the only feasible alternatives for the proposed project. The Marine Corps' desire to reduce the commute time from the south base to the north base does not justify selection of housing sites with significant recreational and visual impacts. The Commission staff believes suitable land in the southern base is still available for the construction of housing, including areas identified by the Marine Corps as family housing areas in the south base. Due to the sensitivity and the impacts resulting from development of the proposed location, the Commission finds that other available areas on base should be developed prior to San Mateo Point.

In its review of CD-50-95, the Commission staff specified a number of locations identified in a 1990 Draft Master Plan, prepared by the Department of the Navy for Camp Pendleton, which indicated areas suitable for development, a number of which identified housing as a possible use in the "suitable" areas (see comment letter on Draft Environmental Assessment for CD-50-95). Additional discussions with the Marine Corps, and a site visit undertaken by the Commission staff, have led the staff to agree with the Marine Corps that many of these areas, which are "cantonment" areas, are un-suitable for family housing due to training activities which could be hazardous to children. In other words, the staff tends to agree with the overall assumption made by the Marine Corps that family housing should be generally isolated from hazardous activities.

While the Marine Corps has stated that several of the housing areas identified by the Commission staff in the south base are at full capacity for housing construction (Stuart Mesa, Del Mar, and Serra Mesa), two other housing areas in the southern area of the base (Wire Mountain and DeLuz) are proposed for expansion of housing areas. Funding for continued planning and construction are in future years (FY 97 and FY 98) budgets. Based on discussions with the Marine Corps, these areas are still in the planning stages. In response to Commission staff's request for site plans for these areas to help determine the feasibility of locating the 76 or the full 120 San Mateo Points units within the conceptual plans for these areas, the Marine Corps states: "Since the completion of the conceptual site plan, we have found additional engineering and environmental constraints which will require significant changes to the conceptual site plans." Therefore the Marine Corps has not provided the staff with any preliminary site plans. The Commission staff believes that the proposed project may be able to be developed on these sites.

Further, it appears that land adjacent to, but separate from, the future proposed housing at Wire Mountain may be available for additional housing (Exhibits 12 and 13). The Marine Corps has identified an area near the Wire Mountain housing as "reserved" for commercial development (Exhibits 12 and 13); however, the Commission staff has received no defined plans for the use of

this land. Also, the Marine Corps has not explained why the commercial needs of the tenants cannot be met in Oceanside, which is directly to the south of this housing area.

The Marine Corps has also identified the HQ/16 area (Exhibit 11) as a future housing site (Exhibit 12). The Marine Corps' conceptual plan for that area estimated approximately 950 units in this area. Because the existing uses (office space and warehousing) will have to be relocated and the area rehabilitated, the Marine Corps has stated that it "do[es] not expect the HQ/16 Area to be developed for new family housing for several years" (Exhibit 12). However, the Commission believes that this area represents an additional area where the proposed project could be developed, avoiding impacts to coastal resources. Since plans include ultimate development of this site, development of San Mateo Point should occur after this and the other options described above are unavailable.

In addition to arguing that the project must be located in the north base, the Marine Corps has dismissed a number of other alternatives, based on *potential* habitat values, particularly the presence of coastal sage scrub, which can provide gnatcatcher habitat. However, the Marine Corps has not provided a sufficient level of information to identify whether significant impacts would occur from development of those areas.

For this project, the Commission must determine whether impacts to the recreational experience at San Onofre State Beach are less damaging than impacts to habitat at other alternative sites, which would not have the coastal recreational impacts. To make this determination, the Commission needs information regarding specific habitat values at a number of sites that the Marine Corps has dismissed as alternatives. While the Coastal Act gives high priority to protection of habitat values and sensitive species, the mere presence of potential habitat values does not automatically mean that development of a site would be a more damaging alternative. The Marine Corps has dismissed a number of sites for the proposed project based on the presence of coastal sage scrub. While the Commission agrees that development of some of these sites could be more damaging than development at San Mateo Point because of the presence of gnatcatchers, a listed species, the Commission has insufficient information for other sites to make a conclusion regarding the potential impacts on habitat and wildlife.

The Commission believes several alternative sites may be feasible for the proposed project, but lacks sufficiently detailed analysis to determine the relative impacts on habitat. For example, the Marine Corps has indicated land adjacent to the Wire Mountain area, specifically near the "reserved" commercial area, as having gnatcatcher habitat (Exhibit 13). However, it has also stated that "[l]ong range plans include possible commercial development, consistent with environmental constraints, in this area." Given this statement, the land may be able to support additional housing. Therefore, the Commission is not convinced that San Mateo Point is the only feasible land available for development of the proposed housing.

Further, the Marine Corps has dismissed another alternative site (O'Neil Heights, see Exhibit 11), stating that "creation of a firebreak around the O'Neil Heights development would eliminate a strip of approximately six acres of coastal sage scrub which may support California gnatcatcher. Elimination of this habitat would result in a significant impacts which would require avoidance or

mitigation to reduce to a less than significant level" (Draft Environmental Assessment). The Commission has no further information to evaluate the actual impacts from development of the site, or the potential to avoid the six acres of habitat due to project design. Other alternatives rejected in the Draft Environmental Assessment also indicate the presence of coastal sage scrub, but indicate that those impacts are mitigable.

While the Commission would not authorize development having significant impacts to habitat if an overall less damaging alternative is available, the Commission does not have sufficient information regarding the habitat values at a number of alternative locations to identify whether development at those sites would lead to a significant impact. Given the impacts at San Mateo Point, without this information, the Commission cannot determine that San Mateo Point represents the least damaging alternative for the proposed project.

To conclude, development in the southern end of the base would avoid the coastal zone impacts of the proposed projects. Further, the Commission believes that a south base-north base commute represents a typical commute for the San Diego region and cannot be considered an excessive commute, particularly as there is no guarantee that officers housed in north base will be or remain stationed at north base training areas. Given the size of Camp Pendleton, which is one of the largest Marine Corps bases in the country, and the above alternatives discussion, the Commission finds that the Marine Corps has not made a convincing showing that the project site represents the least damaging feasible site on Camp Pendleton for this project.

4. Conclusion:

The Commission finds that the project has not been sited and designed in a manner that protects scenic public coastal views, is visually compatible with the character of the surrounding area, or protects the existing recreational use of the area. Moreover, the Commission believes that feasible alternative sites are available which would avoid visual and recreation impacts. The Commission therefore finds the project inconsistent with Sections 30251, 30221, 30240, and 30213 of the Coastal Act.

B. Sensitive Habitat Resources: Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum population 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 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 habitat, and minimizing alteration of natural streams.

Section 30240 states:

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values ...
- (b) Development in areas adjacent to environmentally sensitive habitat 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.

1. Habitat Types and Sensitive Species

The project site consists of approximately 32 acres of disturbed and landscaped mesa top. The vegetation on site is primarily non-native grasses, with a few native species. According to the Draft Environmental Assessment for CD-50-95, no sensitive species were found on the project site. However, a complex of 25 depressional wetlands, several of which may qualify as vernal pools possibly able to support two species of fairy shrimp, occur on the southeast corner of the project site, which is included under the Phase 1 development. Both species, the Riverside and San Diego fairy shrimp, are federally listed species. Construction of Phase 1 will cause the fill and loss of the on-site vernal pools and potential habitat for the Riverside and San Diego fairy shrimp. Through consultation under Section 7 with the U.S. Fish and Wildlife Service, the Marine Corps has committed to include off-site mitigation measures to compensate for the loss of the on-site vernal pools. With the mitigation proposed, the U.S. Fish and Wildlife Service has determined that the project "is not likely to jeopardize the continued existence of the Riverside fairy shrimp and the proposed San Diego fairy shrimp (Final Biological Opinion)."

The area directly adjacent to and below the southeast boundary of the project site contains high quality coastal sage scrub habitat, riparian woodland and riparian scrub, and San Mateo Creek. The Creek mouth and associated 82 acre wetland reserve are part of San Onofre State Beach. Historically the Commission has considered these habitat types to be environmentally sensitive. The Draft Environmental Assessment identified four federally-listed or "category" species that may be found in the environmentally sensitive habitat areas, and may be affected by the project: the Pacific pocket mouse, the tidewater goby, least Bell's vireo, and the California gnatcatcher; further analysis by the Marine Corps identified the southwestern willow flycatcher as potentially affected by the project. Additional information submitted to the U.S. Fish and Wildlife Service enabled the Service to determine that the least Bell's vireo, southwestern willow flycatcher, and the Pacific pocket mouse do not occur in the affected area and will not be affected by the proposed project. The southwestern pond turtle, identified by the California Department of Fish and Game as a species of special concern, is found in San Mateo Creek. In addition, the gnatcatcher has been observed in the coastal sage scrub on slopes below the site, and in habitat adjacent to the utility corridor. The Marine Corps has incorporated a 100 foot buffer between the proposed housing and the coastal sage scrub slope to help reduce impacts to the gnatcatcher. The biological opinion from the U.S. Fish and Wildlife Service states that the California gnatcatcher will not be adversely affected by the proposed action. The U.S. Fish and Wildlife Service further states that protection of the tidewater goby is dependent upon further coordination with the

Marine Corps, including "completion of Base feasibility and effects analyses of the proposed storm water runoff and engineered conveyance structures... (Biological Opinion)." These runoff/water quality effects are discussed below.

2. Water Quality Impacts

a. Runoff

The project has the potential to cause accelerated erosion/sedimentation into, and degradation of water quality in, San Mateo Creek which lies approximately 500 feet to the east of the project site. The Draft Environmental Assessment for the previous project (CD-50-95) states that runoff from the project site drains into San Mateo Creek. The Draft Environmental Assessment also indicates that the proposed drainage improvements to accommodate runoff from the project will include discharge into San Mateo Creek. These improvements remain the same under the current proposals. The Creek drains directly into the ocean at San Onofre State Beach. The beach is a well used recreation area, particularly for surfing. In addition, the tidewater goby and the southwest pond turtle are found in San Mateo Creek. The potential for impacts to water quality in San Mateo Creek comes not only through temporary degradation during construction of the project, but also from long-term impacts once the project is constructed. Even with the incorporation of a 100 foot buffer on site between the proposed homes and the edge of the slope leading down to the creek, runoff will still be directed towards the creek.

To reduce the likelihood of water quality impacts to San Mateo Creek through erosion, sedimentation, and increased runoff from the proposed project, the Marine Corps has incorporated detention basins into both proposals; the basins will be located outside of the 100 foot buffer area, and will be constructed at the beginning of rough grading for the project (Exhibit 14). The Marine Corps believe that the detention basins and location of two outfall pipes will be sufficient to control runoff from the site to pre-development rates and to control erosion. Two outlet pipes will control runoff from the site. The outlet pipe to the east will discharge to the existing paved path which runs from the top of the slope across the main public beach access path at the bottom of the slope. The path running down the slope is not currently used. The outlet pipe to the west will discharge into an existing swale, toward a heavily vegetated portion of the slope, which will also serve to reduce erosion. To ensure that the discharge from the detention basins will not increase erosion, riprap will be placed around the outfalls. The construction for the outlet pipe and riprap to the west will result in impacts to 100-300 square feet of coastal sage scrub. The detention basins will function as sedimentation facilities during construction, when soils will be exposed. These basins will also serve to hold post-construction runoff, which will be released in a manner to limit the rate of post-development storm water discharge flows to that existing prior to development. The Marine Corps estimated that the overall increase in water runoff for the original proposal of 128 units would be 10.8%; the runoff from the current proposals will be less than the previously anticipated increase.

To further reduce erosion and sedimentation, the Marine Corps proposes to initially grade only the land designated for Phase 1 of the project; this grading however will include placement

of the detention basins. The remainder of the parcel will not be graded until construction of Phase 2 of the project.

With regards to assuring the quality of the runoff, the Marine Corps has indicated that Best Management Practices will be used to ensure that the water quality of the Creek and wetland area is maintained. These measures include routine street sweeping, prohibitions against auto maintenance, and restrictions on the use of pesticides and fertilizers. If properly maintained, the detention basins will also serve as a filter for pollutants. Ground maintenance will be undertaken by the Marine Corps, rather than individual property owners. The Marine Corps believes that this method will reduce the use of pesticides and fertilizers used on the site, thereby lessening the water quality impacts to San Mateo Creek.

The effectiveness of the detention basins for controlling runoff and sedimentation is dependent on their being appropriately sized and maintained. The Marine Corps has stated that an annual inspection will occur to ensure that the pipes are free flowing and clean, and to ensure that the riprap is remaining in place to prevent erosion.

To ensure that the proposed projects will not negatively impact water quality and habitat values, the Marine Corps has included as part of the proposed projects a monitoring plan. The consistency determinations state:

Camp Pendleton will establish a water quality and vegetation monitoring plan adequate to protect San Mateo Creek from adverse effects which would significantly degrade the creek and adjacent areas, and to maintain natural slope vegetation. Camp Pendleton will provide this plan to the Coastal Commission and will provide the results of this water quality monitoring to the Commission during a two-year (non-drought) monitoring period. If this monitoring indicates significant degradation is occurring as a result of stormwater runoff from the San Mateo Point development, the Marine Corps will undertake remedial actions. This water quality monitoring data will also be provided to the United States Fish and Wildlife Service (Service) periodically at intervals agreed to by Camp Pendleton and the Service. The concept for this plan includes developing a baseline and further water quality testing at the site and estuary.

The Marine Corps has stated that the above mentioned monitoring will be undertaken during each phase of the construction and for two years after each phase of construction. The Department of State Parks and Recreation has raised concerns regarding the erosion potential from stormwater runoff (Exhibit 15). However, the Commission believes that the Marine Corps' commitments, described above, to avoid adverse effects, monitor, and remediate any erosion problems adequately addresses these concerns.

b. Sewage Pipe

The construction of the sewer line also has the potential to adversely affect sensitive habitat and water quality of the Creek. The construction of the proposed sewer line will run adjacent to the habitat areas and will be suspended over San Mateo Creek. The Marine Corps has stated that

it is involved in discussions with the City of San Clemente to provide sewer service for the proposed development. If such an arrangement is finalized, the need for a sewer line to traverse the bridge will be eliminated. However, the Commission staff has received no confirmation of this proposal, and therefore must analyze the potential impacts from the possible construction of the sewer line.

The Marine Corps has indicated that the sewer line will remain primarily within the hard surface area of old Highway 101, and has stated that no encroachment will occur into the riparian habitat or coastal scrub, except for a small area of disturbed coastal sage scrub along Interstate 5 which will be revegetated. To protect habitat areas and water quality, the Marine Corps has committed to locating stockpiling and staging areas away from sensitive habitat areas and away from San Mateo Creek. Further, the Marine Corps has included the placement of sediment barriers and fencing/flagging sensitive areas to ensure that no encroachment into these areas occurs during construction.

The sewer line could also significantly impact water quality if the sewer line should break. The tidewater and southwestern pond turtle utilizes the Creek habitat, and therefore can be affected through degraded water quality and pollution. In addition, the Creek flows out to the ocean at a popular surfing recreation area, where untreated sewage could affect human health. To protect San Mateo Creek and the surrounding sensitive habitat areas, Marine Corps the committed to installing shut-off valves on either side of the creek. The shut-off valves would limit discharge in the event of a drop in pressure.

c. Water Supply

Information in the Draft Environmental Assessment indicated that water for development of the site will be provided either through the Metropolitan Water District or, more likely, through the San Mateo Basin Aquifer. Providing the proposed project with water drawn from the aquifer may impact San Mateo Creek. In its response to comments on the Draft Environmental Assessment, the Marine Corps stated that water for the proposed project will be provided through the Metropolitan Water District and that it will not use water pumped from the San Mateo aquifer. Based on this project revision, the Commission agrees that the proposed water source for the project will not negatively affect San Mateo Creek.

3. Other Impacts on Sensitive Resources

The introduction of exotic vegetation can also directly affect sensitive species in the habitat adjacent to the project site by altering the habitat those species rely on. In response to comments regarding the encroachment of exotic species into the coastal scrub and/or wetland area, the Marine Corps has stated that it will use "non-aggressive/invasive drought tolerant landscaping" and regionally native plants within the housing site. While the use of these species will reduce the potential for invasive species encroaching into the wetland, the Commission cannot be assured that the project will not negatively affect the sensitive habitat adjacent to the site without monitoring the sensitive habitat areas or landscaping only with native species. As part of the

water quality monitoring program, the Marine Corps has stated that it will include vegetation monitoring.

However, additional information provided by the Marine Corps with regards to its screening program relies on a number of invasive species, including Myoporum, California Pepper, Melaleuca, and Eucalyptus (Exhibits 12 and 15). Since these species will be used to screen the proposed housing, they will be located near the southeastern edge of the property, closest to the coastal sage scrub and wetland habitat areas. The use of these species contradicts the Marine Corps commitment to use native or noninvasive species to assure protection of the existing habitats on the southeastern slope and the wetland area.

Predation by domestic animals can also impact the sensitive species adjacent to the site. The Marine Corps has indicated that domestic animals will not be permitted in the housing development.

Either of the proposed projects will introduce lights and noise to the area that may affect a number of listed species adjacent to the site. In its response to comments regarding concerns about lighting and noise on sensitive species, the Marine Corps states:

Project-generated light shining into the off-site habitats can cause impacts. The "unnatural" light at night could be disruptive to normal animal and bird behavior patterns. Potentially significant impacts to the California gnatcatcher could occur if such lighting interfered with nesting and rearing success. Additionally, this added light can make some animals more susceptible to predation.

To address this concern, the Marine Corps has stated that no lights will shine directly into the sensitive habitats, and that necessary lighting will be shielded in the direction of the habitats. The project also incorporates a 100 foot buffer that will help reduce impacts on sensitive species from lighting. Regarding impacts from noise, the Marine Corps has stated that "increased noise would not be expected to cause significant impacts." In addition, the project incorporates a 100 foot setback, which will help reduce impacts from noise, although the area will be mowed periodically, which will itself cause noise impacts.

As discussed in Section D below, (Public Access), the bluff area will be fenced and not accessible from the proposed project site. This measure will help ensure that informal trails to the beach will not be cut through sensitive habitat.

4. Conclusion

To conclude, with respect to habitat impacts, the Commission's major concern is over the use of invasive species for the visual screening program. With the use of these species, the Commission is unable to determine that the project complies with the requirement Section 30240 of the Coastal Act that development adjacent to environmentally sensitive habitat areas be "designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of those habitat ... areas." A revised landscaping plan, limiting

the species to be used for vegetative screening to include only native and/or noninvasive species, would bring the project into conformance with the sensitive habitat resource policies of the Coastal Act.

C. Public Access: Several policies of the Coastal Act serve to protect public access to and along the shore. Coastal Act Section 30210 states:

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 states:

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 states, in part:

(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.

Section 30252 states, in part:

The location and amount of new development should maintain and enhance public access to the coast by ... assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The project location is within the Marine Corps Base of Camp Pendleton. Public access is currently available directly adjacent to the site, paralleling the site to San Onofre State Beach. An additional walkway/bikepath extends from the site, south, paralleling the beach (see Exhibit 7). No existing access is provided from the project site to the beach.

Construction of the utility corridor has the potential to affect public access during the construction phase of the project. The Marine Corps has committed to ensuring that the access

path to the beach and bikepath upland and parallel to the beach will remain open during construction of the project. Access points will be signed and bicyclists, pedestrians and vehicles will be directed by a flagperson during truck/equipment travel in the vicinity. Construction of the proposed housing will not impede or close the existing accessways.

The Coastal Act requires that new development generating access burdens provide additional access unless, among other things, adequate access exists nearby or such access would conflict with the protection of fragile coastal resources. Establishing an access path from the project site is unnecessary due to existing lateral and vertical access directly adjacent to the site. In addition, the proposed housing project lies directly adjacent to a slope with high quality coastal sage scrub. Unrestricted access through this area to the beach could result in degradation of this habitat. To ensure protection of these sensitive resources, the project will include a six foot fence between the development and the slope. The fence will ensure that informal paths are not cut down the bluff and through the sensitive habitat to reach the beach.

In terms of access burdens generated by the project, the existing road system in the greater project area has adequate capacity to accommodate traffic generated by the proposed development. The Marine Corps has provided for on-site recreation area as required under Section 30252. In terms of bicycle and/or pedestrian access to the State Park and beach by residents of San Mateo Point, the existing accessways and beach areas are large enough to accommodate the project-generated additional use of the accessways and beaches in the area, and thus the new users will not overload the existing accessways and recreation areas.

The Commission therefore finds additional access does not need to be provided on-site because adequate access exists nearby, additional access in certain portions of the site would conflict with the protection of fragile resources, and the project does not pose additional burdens on public access. Therefore, the Commission finds the project consistent with the public access policies of the Coastal Act.

D. Geologic Stability: Section 30253 provides, in part, that new development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding areas or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

The project site is approximately 400 feet away from the shoreline. San Onofre State Beach, low lying dunes, and a railroad lie between the project site and the ocean. Therefore, erosion from wave activity is not expected. Nevertheless, Appendix E of the Marine Corps' Draft Environmental Assessment notes some erosion problems occurring from runoff at the proposed

site, in addition to some buckling at the site due to undermining. In its letter dated April 30, 1996, the Commission staff requested information regarding what measures the Marine Corps will undertake to address those problems and assure the stability of the site. In its response to comments, the Marine Corps indicated that the current runoff and erosion problem on the site is due to a lack of maintenance of paving existing on the site, and not due to instability of the site. The proposed project will be designed and maintained to prevent on-site erosion. Therefore, the Commission finds that the project is consistent with Section 30253 of the Coastal Act.

E. Archeology: Section 30244 of the Coastal Act states:

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

A number of archeological sites are located at San Mateo Point. The Marine Corps has agreed to preserve cultural resources by placing gravel and soil over the affected portions of the site. Further, the State Historic Preservation Officer has determined that the development of the proposed project will not adversely impact cultural resources on the site.

If undocumented resources are discovered during the implementation of the proposed project, the Marine Corps has agreed to halt construction and evaluate the action for further consultation requirements, including coordination with the State Historic Preservation Officer. Therefore, the Commission finds the project consistent with the Section 30244 of the Coastal Act.

F. Measures to Bring the Project into Conformance with the CCMP:

Section 930.42(a) of the regulations implementing the CZMA provides, in part, that:

In the event the State agency disagrees with the Federal agency's consistency determination, the State agency shall accompany its response to the Federal agency with its reasons for the disagreement and supporting information. The State agency response must describe (1) how the proposed activity will be inconsistent with specific elements of the management program, and (2) alternative measures (if they exist) which, if adopted by the Federal agency would allow the activity to proceed in a manner consistent to the maximum extent practicable with the management program.

1. Alternatives Necessary due to Project Impacts on Visual and Recreation Resources:

As discussed on pages 11-14, the Commission finds that the Marine Corps has not made a convincing showing that the project site represents the least damaging feasible site on Camp Pendleton for this project. Because of the impacts this project will have on visual resources and recreational opportunities, a more adequate analysis of alternative sites is necessary. The

Commission believes alternative sites are available on the base which would reduce or avoid the impacts from this proposed project. These alternative areas include the incorporation of the proposed project into the existing housing areas in the south base, expansion of these areas to adjacent lands, and/or rehabilitation of the Headquarters area for housing. Consideration of alternatives should not, however, be limited to these identified areas.

2. Alternatives Based on Project Impacts to Sensitive Resources:

As discussed on page 19, the Marine Corps' proposed use of invasive vegetation to screen the proposed project conflicts with its commitment to use native and/or non-invasive species for landscaping. In addition, invasive species can negatively impact the sensitive habitats adjacent to the site. Revising the screening program to use only native and/or non-invasive species would bring the proposed project into conformance with the Coastal Act habitat Section 30240.

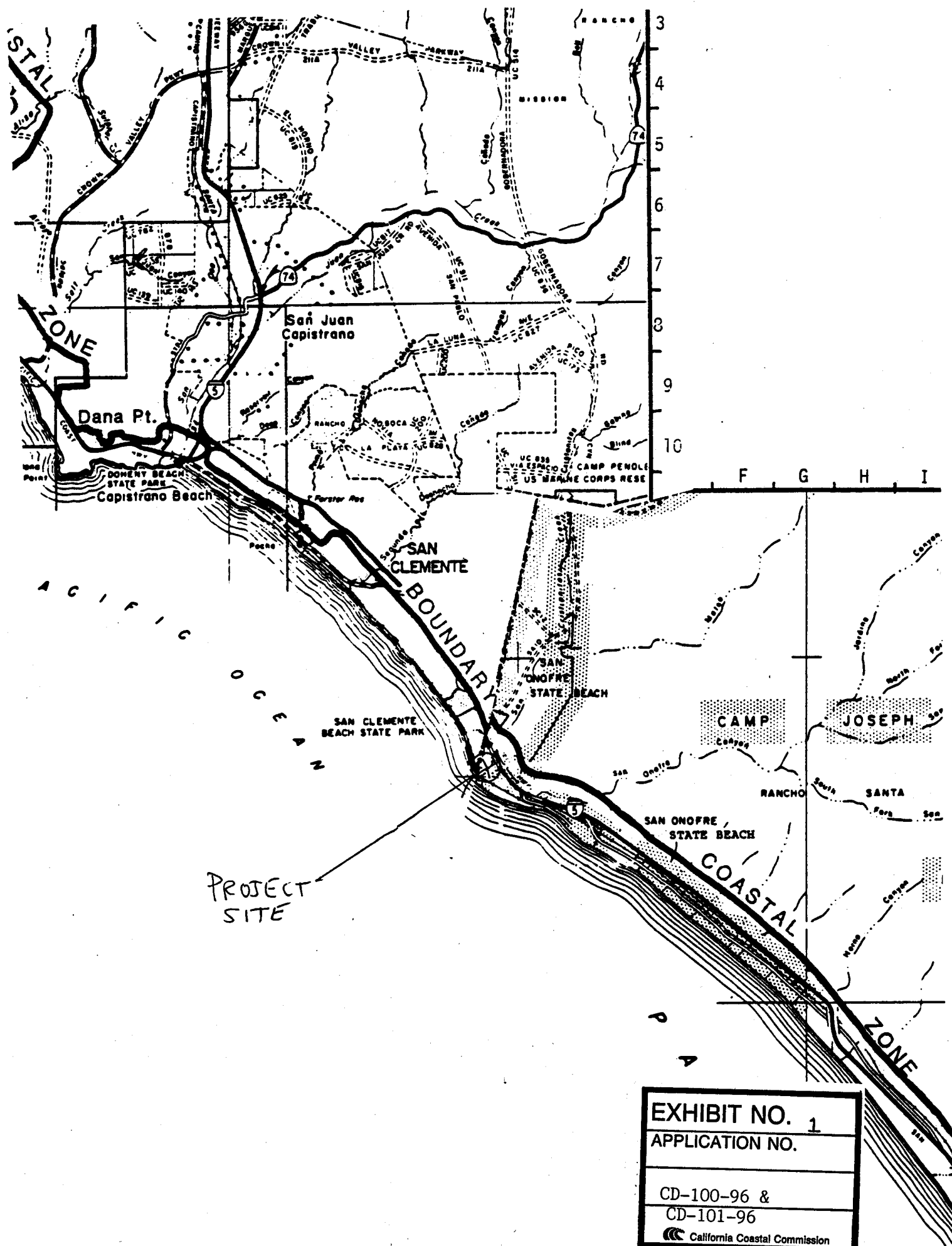


EXHIBIT NO. 1
APPLICATION NO.
CD-100-96 & CD-101-96
California Coastal Commission

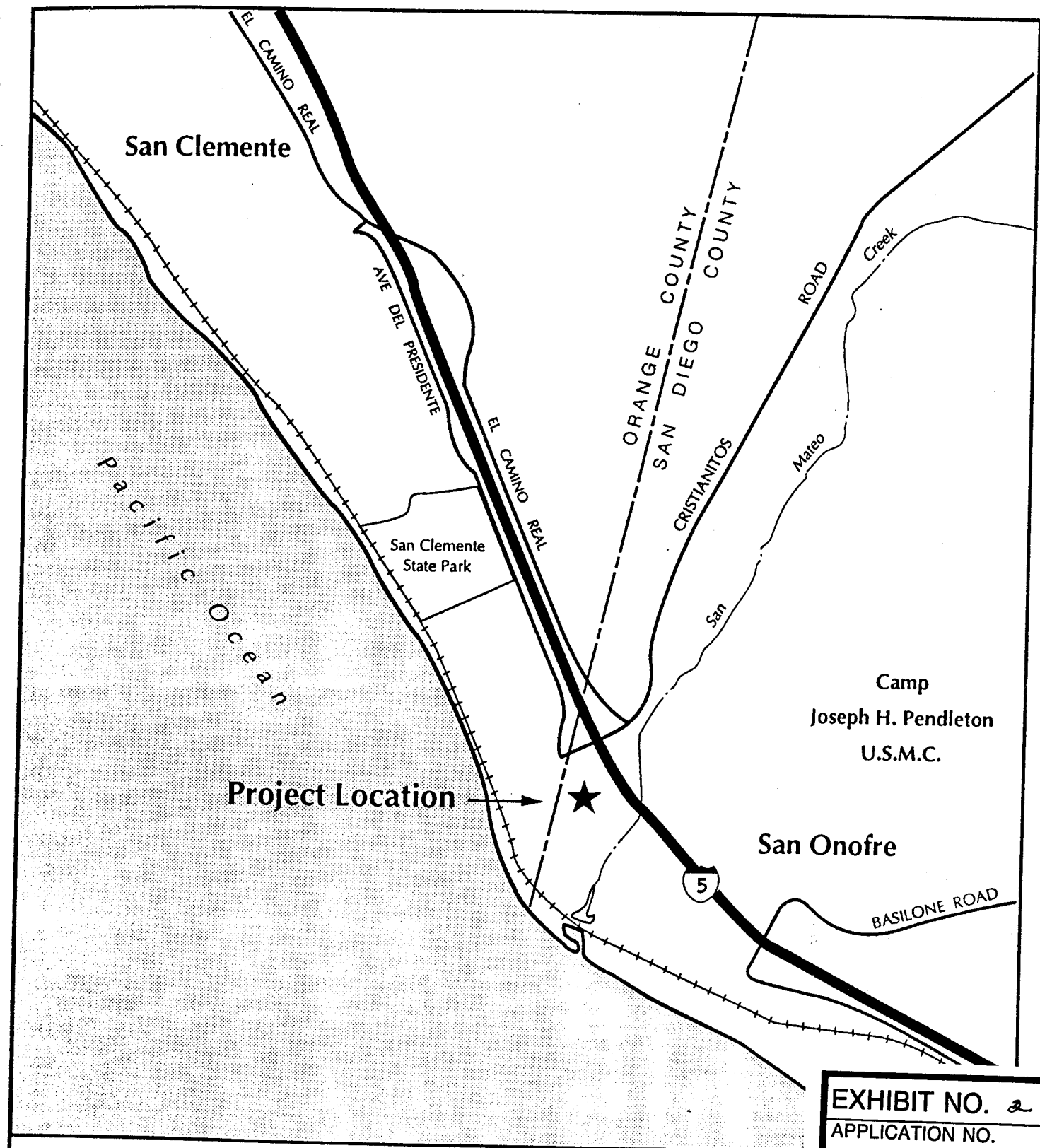


EXHIBIT NO. 2

APPLICATION NO.

CD-100-96 &

CD-101-96

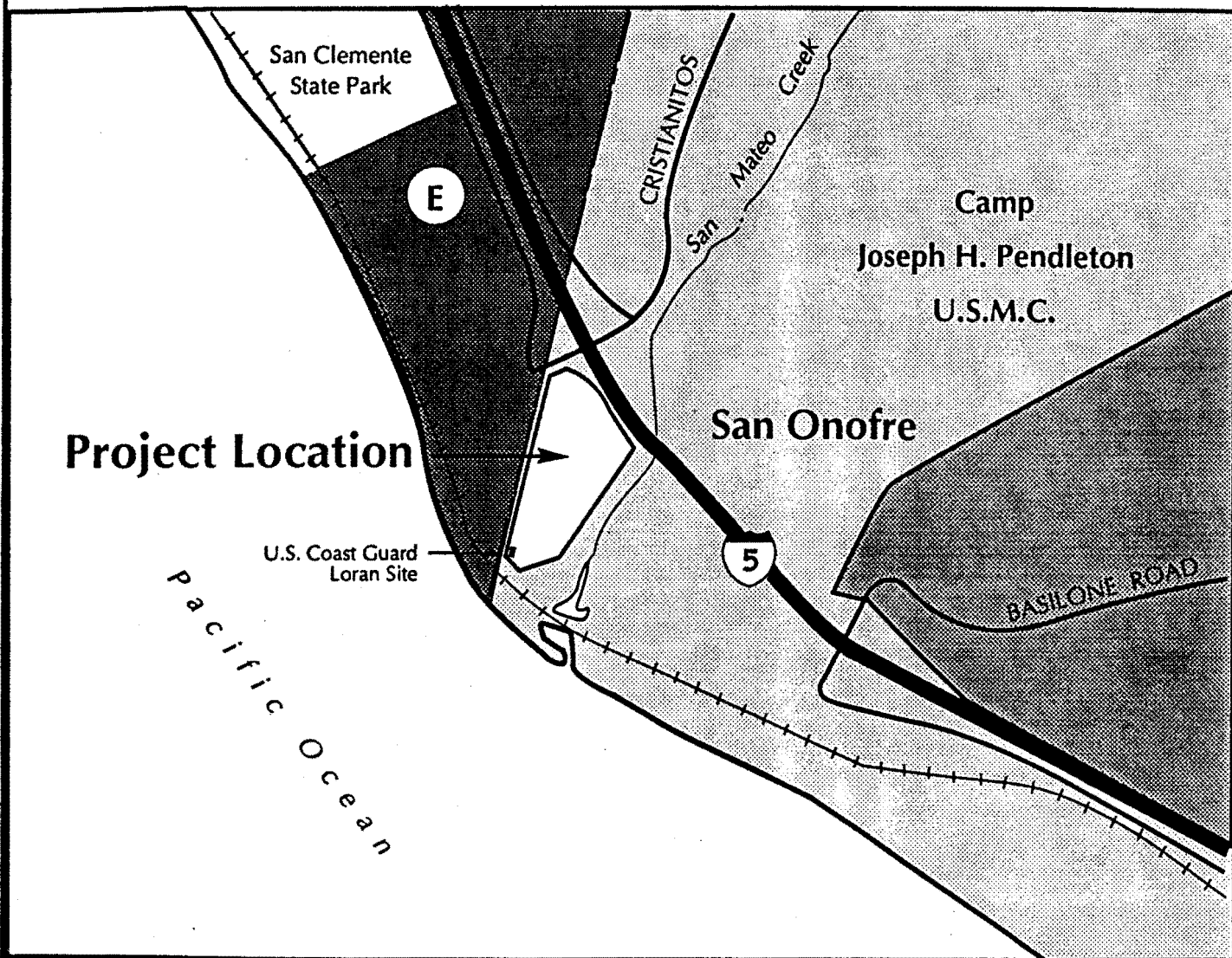
California Coastal Commission



N.T.S.

SAN MATEO POINT
MARINE CORPS BASE OFFICER FAMILY HOUSING

Site Vicinity Map









-  Medium Low Density Residential (7.0 D.U. / Ac. Maximum)
-  MCB Camp Pendleton Family Housing
-  MCB Camp Pendleton Outleased Area
-  Elementary School
-  N.T.S.

EXHIBIT NO. 3
APPLICATION NO.
CD-100-96 &
CD-101-96
 California Coastal Commission

SAN MATEO POINT
MARINE CORPS BASE FAMILY HOUSING
Area Land Use



EXHIBIT NO. 4

APPLICATION NO.

CD-100-96 &

CD-101-96



California Coastal Commission

SAN MATEO POINT
MARINE CORPS BASE FAMILY HOUSING

Aerial Photograph

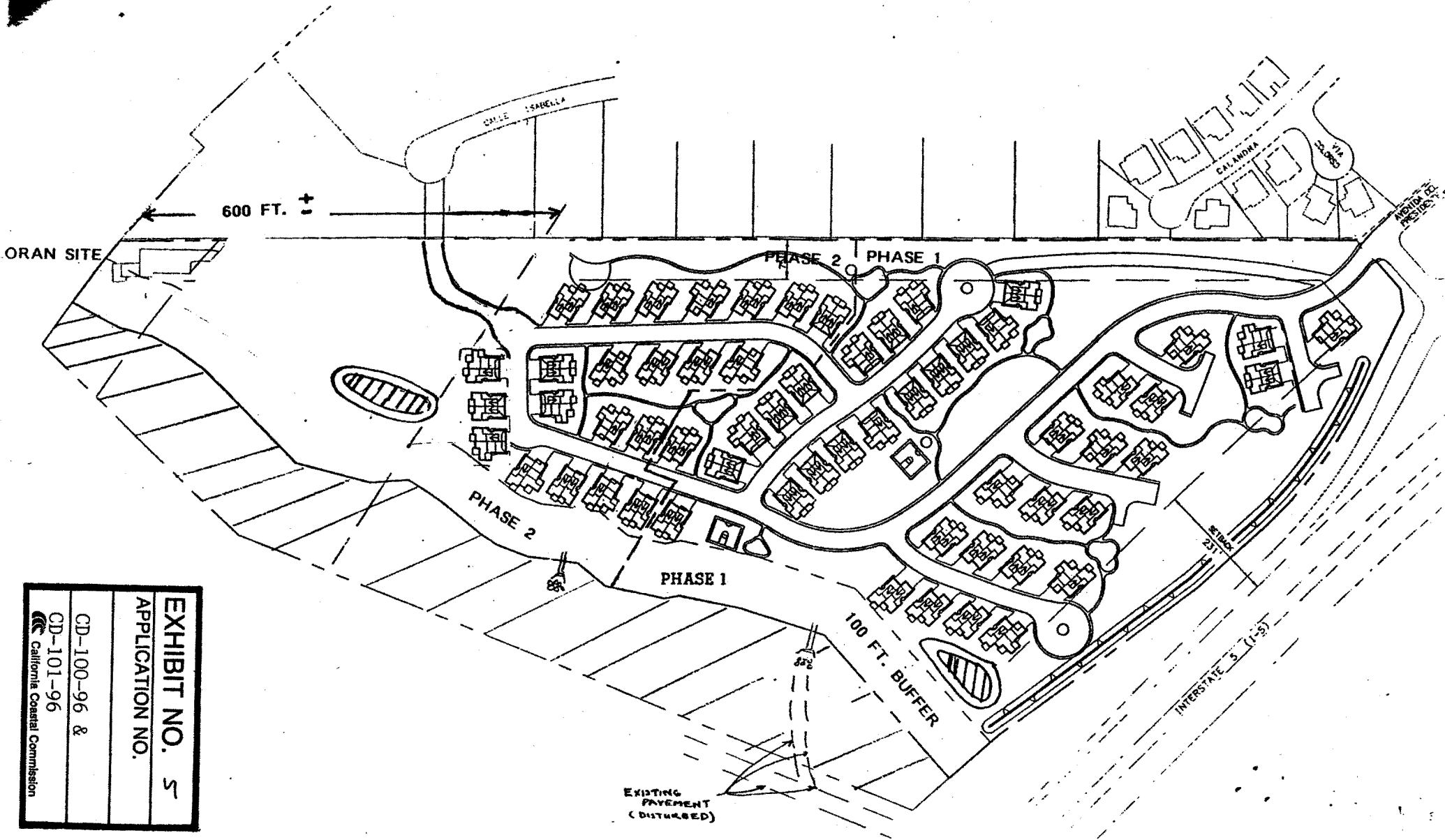
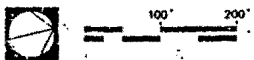
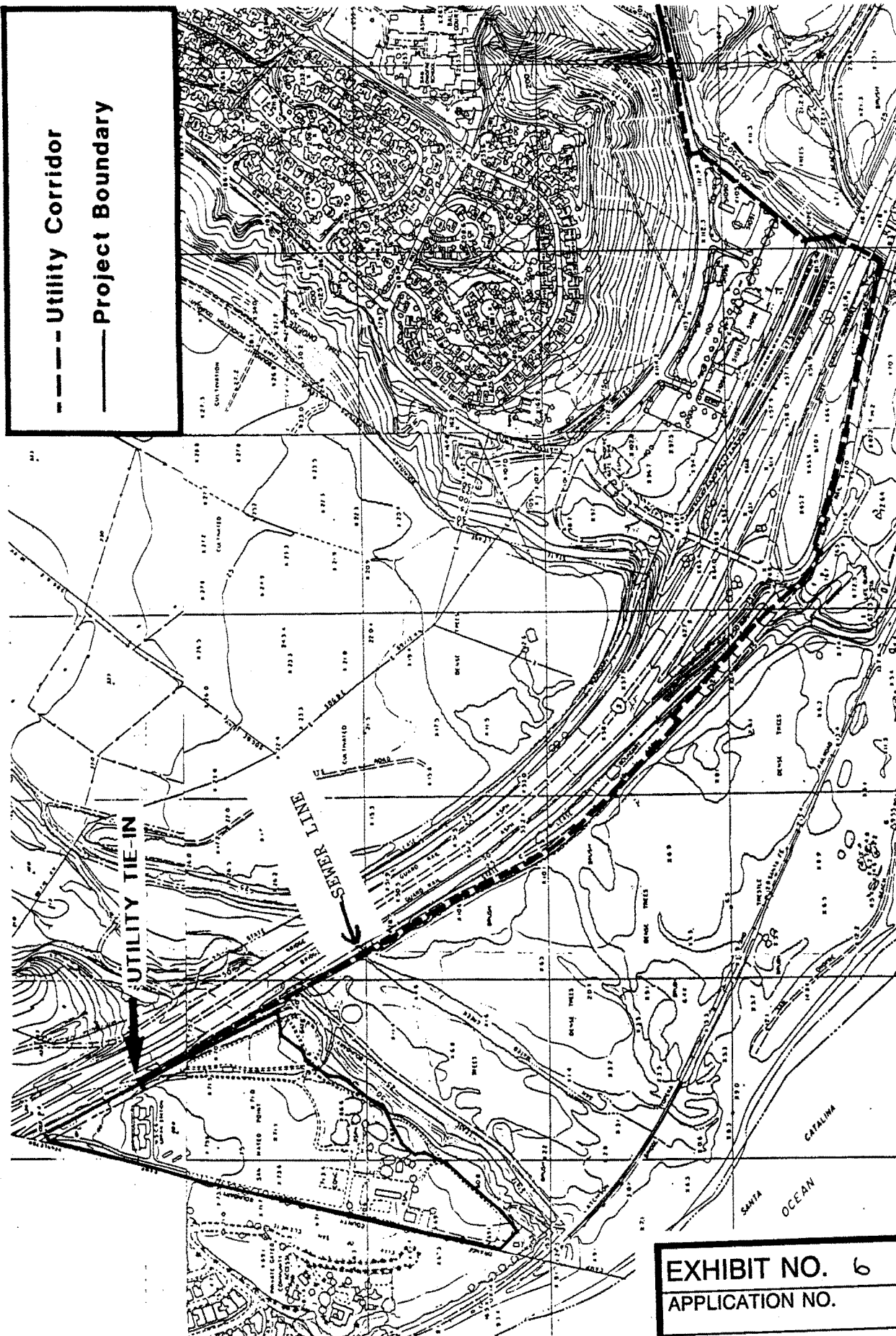


EXHIBIT NO. 5
APPLICATION NO.
CD-100-96 & CD-101-96
California Coastal Commission

CONCEPTUAL DEVELOPMENT PLAN



SAN MATEO POINT
MARINE CORPS E
Conceptual I



SAN MATEO POINT MARINE CORPS BASE FAMILY HOUSING

Utility Corridor

0 800



EXHIBIT NO. 6

APPLICATION NO.

CD-100-96 &

CD-101-96

California Coastal Commission

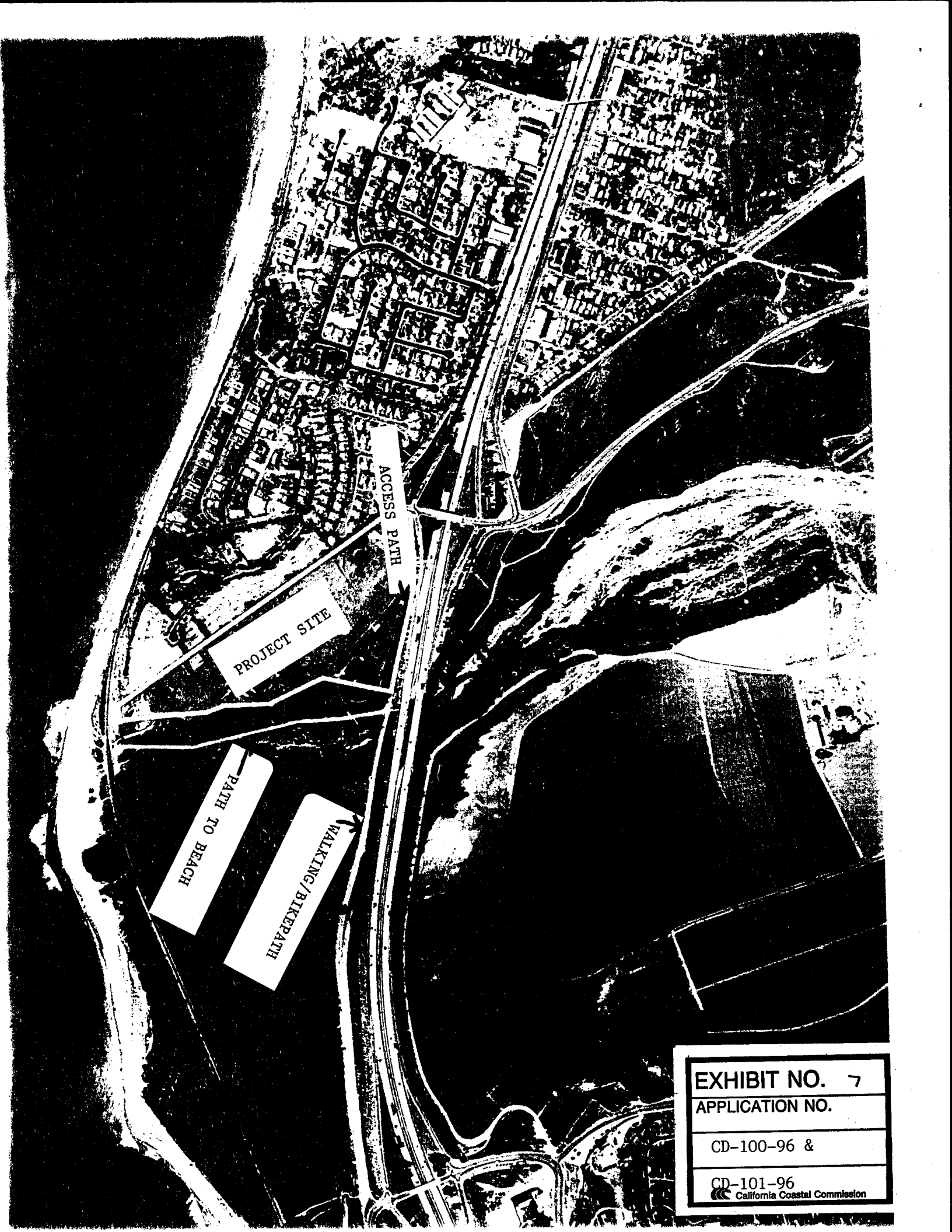
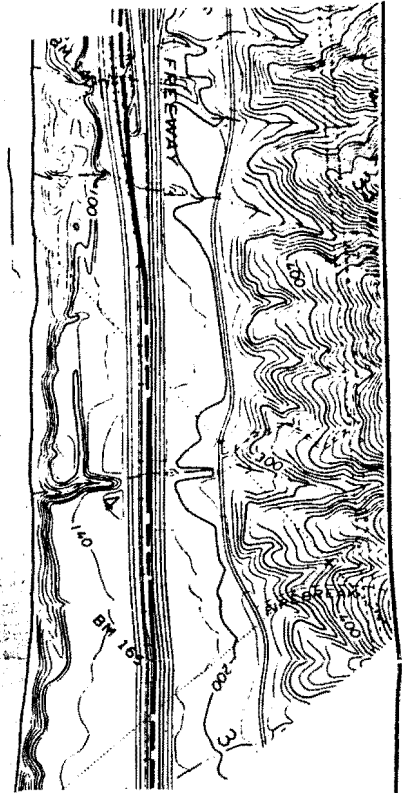


EXHIBIT NO. 7

APPLICATION NO.

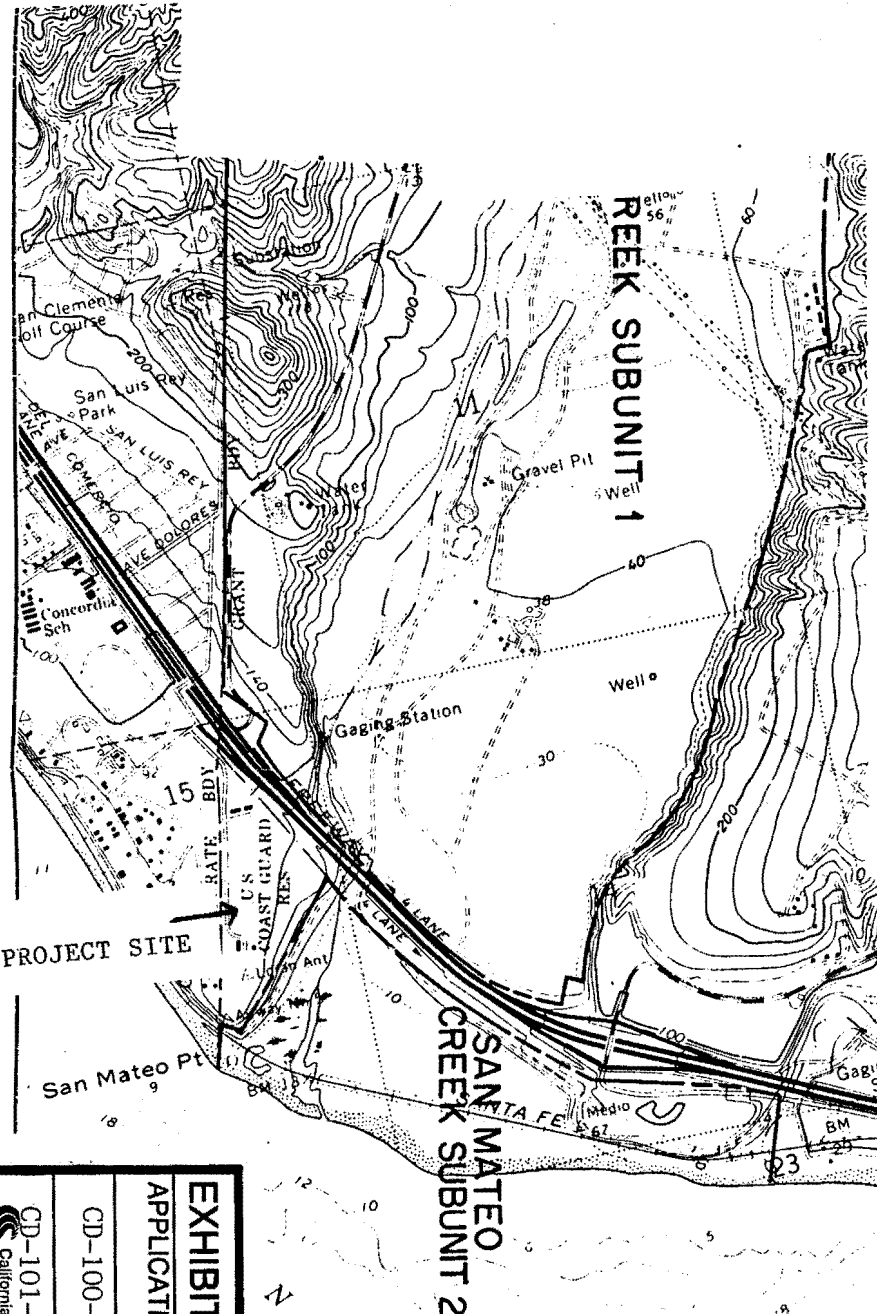
CD-100-96 &

CD-101-96
California Coastal Commission



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NIT 4

SURFER BEACH
SUBUNIT 3



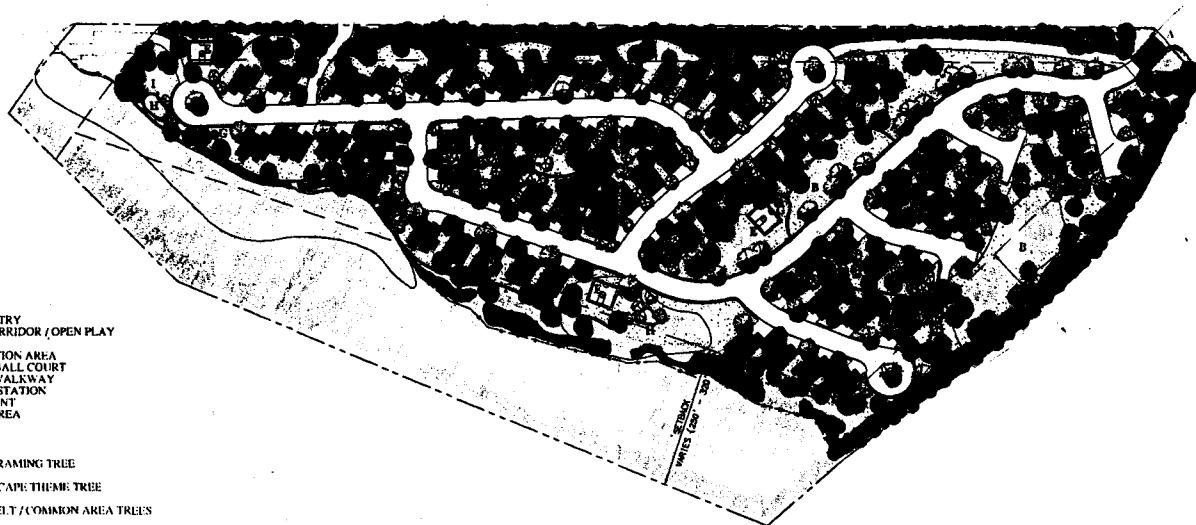
MATCH LINE A

	CD-101-96
	CD-100-96 &
	CD-101-96

EXHIBIT NO. 2 APPLICATION NO. SAN ONOFRE STATE BEACH RESOURCE ELEMENT SUBUNITS & ELEVATION FEATURES

RESOURCES AGENCY OF CALIFORNIA DEPARTMENT OF PARKS AND RECREATION APPROVED _____ DATE _____

REVI DRAWN CHECKED



LEGEND

- A. MAIN ENTRY
- B. VIEW CORRIDOR / OPEN PLAY
- C. TOT LOT
- D. RECREATION AREA
- E. BASKETBALL COURT
- F. 4' WIDE WALKWAY
- G. FITNESS STATION
- H. VIEW POINT
- I. PICNIC AREA

- ENTRY FRAMING TREE
- STREETSCAPE THEME TREE
- GREENBELT / COMMON AREA TREES
- MEDIUM ACCENT TREE
- FREEWAY BUFFER / SCREENING TREES
- NEIGHBORHOOD BUFFER TREES
- SKYLINE ACCENT TREE
- BUFFER / SCREENING SHRUB MASSING
- NATURALIZED / INFORMAL SHRUB MASSING
- GROUND COVER / UNDERSTORY PLANTING
- TUNK



SAN MATEO POINT
MARINE CORPS BASE FAMILY HOUSING
Neighborhood Landscape Plan

JN 501019

F-74

Exhibit F-11

EXHIBIT NO. 9

APPLICATION NO.

CD-100-96 &

CD-101-96
California Coastal Commission

DEPARTMENT OF PARKS AND RECREATION

Orange Coast District
3030 Avenida Del Presidente
San Clemente, California 92672
(714) 492-0802, FAX (714) 492-8412

EXHIBIT NO. 10

APPLICATION NO.

CD-100-96 &

Cd-101-96

PETE WILSON, Governor



April 25, 1996

RECEIVED
MAY 10 1996CALIFORNIA
COASTAL COMMISSION

Commanding General (Attn: CPLO)
Box 555010
Marine Corps Base
Camp Pendleton, California 92055-5010

Subj.: Review of Draft Environmental Assessment - San Mateo Point Family Housing

Dear General:

The Department of Parks & Recreation (DPR) has reviewed the subject document and finds this project may impact unit(s) of the State Park System, specifically San Onofre State Beach and the Trestles Natural Wetlands Preserve. As such, we offer the following comments:

1. Impacts caused by the proposed project include:

A. Endangered species habitat degradation. We are concerned over the introduction of development and subsequent human activity within the nearby natural preserve and areas of endangered habitat. The project, if developed as proposed, will lead to the initiation of trails through the bluff areas to the beaches below by persons residing in the housing area. This will be the case especially near the portion of the development closest to the ocean. Such trails will disturb critical habitat for endangered species to include the California gnatcatcher, least Bell's vireo, and possibly the Pacific pocket mouse, and lead to erosion of the bluff face. The development will also impact other natural resources that are irreplaceable, specifically the existence of vernal pools and the wildlife they support.

B. Drainage into San Mateo Creek. The document indicates the drainage of the project will be directly into San Mateo Creek. It indicates the mitigation for this will be to restrict wash down of sidewalks and roads, limit the use of fertilizers and pesticides, and to remove trash once per week. This does not solve the problem of an urban pollutant load directly to the creek during and after rain events when storm runoff will carry pollutants from autos into the stream. This should be addressed in greater detail to include the possibility of street runoff channeled into the sewer system to avoid adverse impacts to the tidewater gobi and Southwestern pond turtle habitat.

C. Viewshed impacts. The site photographs of the project area leave the reader with a sense the project will be obscure from the use areas of the Park. However, when comparing exhibit 15 against exhibit 16, the reader can not make the same determination as to potential impacts. Exhibit 15 should also include a conceptual photograph of the proposed development for both views 1 & 2. Such viewshed analysis should also consider photograph locations from other sites within the Park in the form of exhibit 16.

1. (cont.) D. Cultural site treatment. The document indicates capping of the Native American coastal archeological sites to be done in a manner consistent with normal practices. We suggest further protective treatment to include the placement of filter fabric to delineate the capping material. Additionally, overlying soil chemistry should be compatible to the substrate to help ensure site stabilization. This type of treatment is now considered the industry standard.

E. Control of domestic pets. The document indicates the need to restrict domestic animals from the site, specifically cats. We would recommend this restriction be expanded to include dogs. This is due to the potential impact such animals present to the native fauna located in the natural open spaces next to the project site.

F. Fuel modification zones. The design of the project puts structures within twenty feet of critical habitat. While there is discussion of a set back to meet fire protection needs, the distance of twenty feet away need expansion. We recommend setbacks consistent with Base standards or local fire district standards in this habitat type in order to avoid routine clearing of native habitat. Additionally, design criteria of the structures adjacent to the boundary should be single story in order to reduce the exposed surfaces to fire danger. Landscape designs should be carefully scrutinized to exclude exotic species that can invade critical habitat areas and the Natural Preserve.

G. Signage requirements. The project site should include interpretive signs designed to educate the reader of any situation rather than to demand compliance with a regulation. The Department would be pleased to assist in this development.

2. Alternative Site Analysis

The document indicated that a number of alternative locations other than the San Mateo Point were evaluated for the proposed development. These areas included the State Park leasehold, the agricultural out lease area within the San Mateo flood plain, and the San Onofre Alternative. These areas were discounted for various reasons, some of which contradicted the justification for the preferred alternative. An example is the rejection of available space within subunit 1 of the State Park leasehold due to proximity to a future freeway route. This was due to noise problems. This is inconsistent with the San Mateo Point location which is immediately adjacent to Interstate 5, the proposed freeway interchange, and the rail route along the coast.

It is our opinion that other sites appear available that meet the needs of Base housing and future training. This is important when considering the impacts of the development upon limited resources. We feel there may be other compatible sites that avoid sensitive cultural and natural resources within the State Park Lease. These would be closer to established work sites on base and away from the potential freeway and associated noise levels.

Page Three
San Mateo Point Housing Project
April 25, 1996

For these reasons, we believe there should be further consideration of alternative sites based upon their individual characteristics compared to those of the San Mateo Point site.

In closing, DPR believes this project will adversely impact the adjacent natural areas as well as degrade the open space experience on the nearby beaches. As such, it is our recommendation that a further evaluation of alternative sites be made and that the open space and recreational values of San Mateo Point be given serious consideration. This is predicated upon the limited coastal terrace areas remaining in open space, the adverse impact to a number of endangered species and habitat, and the apparently available opportunities for this type of project on the Base elsewhere.

We thank you for the opportunity to provide comments on this project. The local contact person for the Department is Mr. David R. Pryor, Associate Resource Ecologist, Orange Coast District, 18331 Enterprise Ln., Huntington Beach, California 92648, telephone (714) 848-1566.

Sincerely,

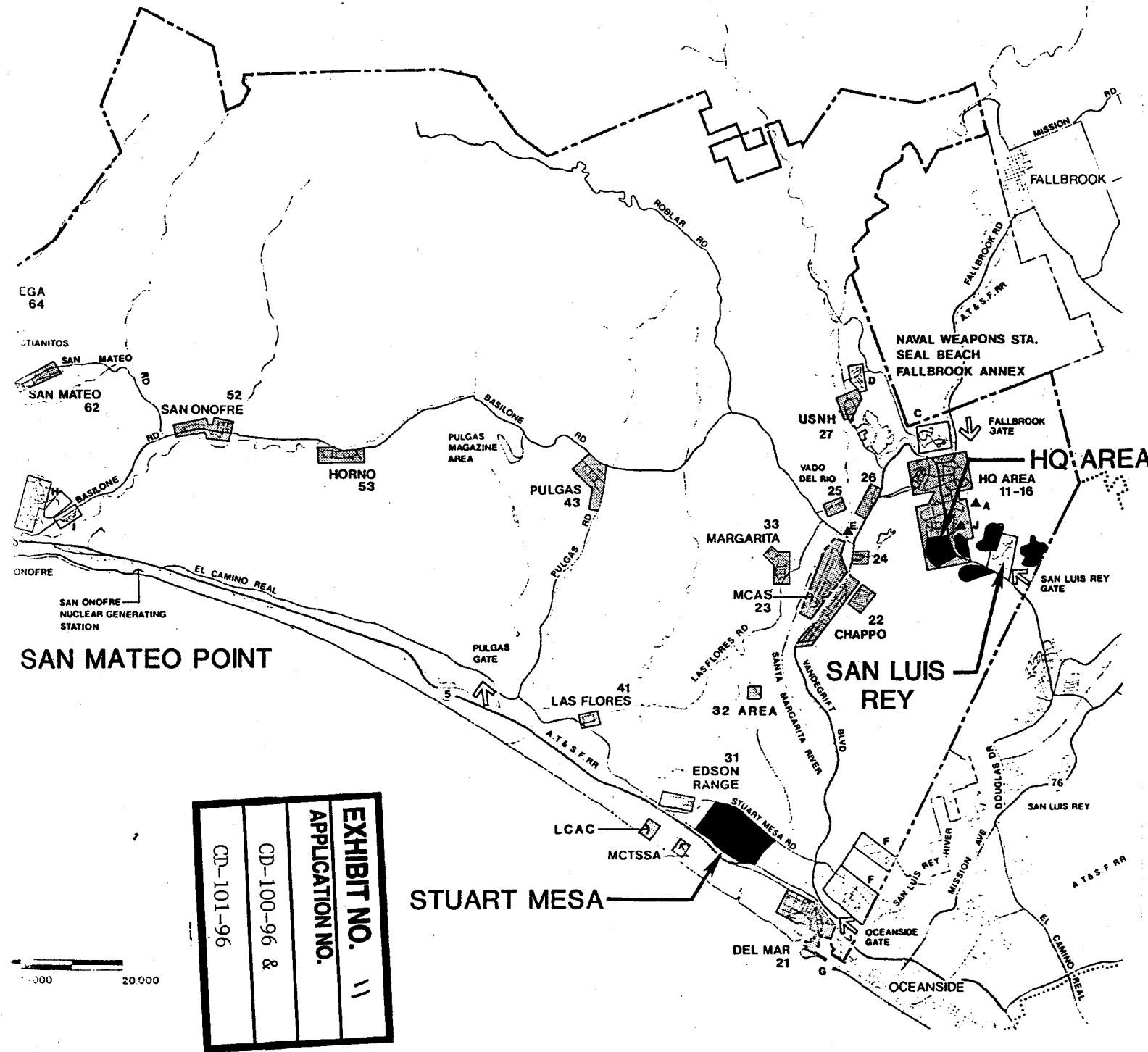
Original Signed by

Jack B. Roggenbuck
District Superintendent

CC: Mr. Kenneth B. Jones, Deputy Director
Park Stewardship
Mr. Richard E. Troy, Division Chief
Southern Field Division
Mr. Richard G. Rayburn, Chief
Resource Management Division
Mr. David R. Pryor, A.R.E.
Orange Coast District

LEGEND

- POTENTIAL HOUSING SITES
- MCB DEVELOPMENT AREA
- FAMILY HOUSING
- A ▲ HQ 11 AREA HOUSING
- B SAN LUIS REY HOUSING
- C DE LUZ HOUSING
- D O'NEILL HEIGHTS HOUSING
- E ▲ RANCH HOUSE
- F WIRE MOUNTAIN HOUSING AREA
- G SANTA MARGARITA HOUSING
- H SOUTH MESA HOUSING
- I DEL MAR HOUSING
- J ▲ SAN ONOFRE HOUSING
- K SAN ONOFRE MOBILE HOME SITES
- L SERRA MESA HOUSING
- M SAN MATEO HOUSING
- N STUART MESA HOUSING



POTENTIAL
HOUSING SITE

MASTERPLAN
MARINE CORPS BASE, CAMP PENDLETON

EXHIBIT NO. 11
APPLICATION NO.
CD-100-96 &
CD-101-96

0 1000 20000



UNITED STATES MARINE CORPS
MARINE CORPS BASE
CAMP PENDLETON, CALIFORNIA 92055-5001

IN REPLY REFER TO:

11300
 CWB:rgw
 September 16, 1996

Ms. Tania Pollak
 California Coastal Commission
 45 Fremont, Suite 2000
 San Francisco, California 94105-2219

Re: SAN MATEO POINT HOUSING PROJECT
 (CD-100-96 and CD-101-96)

EXHIBIT NO. 12
APPLICATION NO.
CD-100-96 &
CD-101-96

Dear Ms. Pollak:

In furtherance of your requests, contained in your letter of September 11, 1996, regarding the referenced coastal consistency determinations, we are providing the following information and the enclosures.

The Marine Corps confirms its previously stated commitments concerning this proposed housing project, as contained in the Draft Environmental Assessment, in our responses to comments to the Draft Environmental Assessment, and in our prior correspondence (including letters of July 24, August 8, and August 9, 1996) with the California Coastal Commission relating our original consistency determination regarding this project (CD-50-95). Per your request, the Marine Corps affirms its commitment to the specific matters noted in your letter of September 11, 1996; these items are addressed in enclosure (1).

Enclosure (2) addresses those additional items which your letter notes have arisen in regard to the new consistency determinations and as a result of discussions occurring during your September 9th visit.

As you have requested, by separate correspondence, we will forward you copies of the Biodiversity Research Consortium's study (headed by Harvard University) of the Camp Pendleton region, and the U.S. Fish and Wildlife Services' Biological Opinion resulting from its Section 7, Endangered Species Act programmatic consultation with Camp Pendleton regarding the Base's Riparian and Estuarine Conservation Plan.

As required by 15 CFR 930.41(b), your request for a 15-day extension of the Commission's time limit to review these consistency determinations is approved. We understand that these consistency determinations will be considered by the Commission during its October 8-11 meeting in Santa Monica.

As we emphasized in our previous correspondence and during your visit, we believe the appropriate alternatives analyses for this project should be focused in the northern portion of Camp Pendleton, where this housing exists. Although we have attempted to answer your

questions relating to potential sites in the southern part of the Base, we continue to believe these are not viable alternatives to the San Mateo Point site.

Should you have additional questions, please contact myself at (619) 725-6521, Mr. Larry Rannals at (619) 725-6513, or Ms. Andrea Marks at (619) 532-3801.

Sincerely,



W. A. SPENCER
Colonel, U.S. Marine Corps
Assistant Chief of Staff, Facilities
by direction of
Commanding General

Encl:

- (1) Confirmation of previous commitments
- (2) Additional Issues

Copy to:

CO, SWDIV (Attn: Andrea Marks)

WACO

CPLO

PWO

CONFIRMATION OF PREVIOUS COMMITMENTS

1. **Sediment Barriers and Fencing During Construction.** Surface runoff controls during construction will be imposed by the contractor to minimize erosion and sediment loading in runoff. This will be achieved through construction of the storm water drainage system, prior to the grading of the remainder of the site, in an effort to contain surface runoff from the construction site; employment of supplemental silt fencing, as needed; and use of vegetative cover, and other absorbent materials in drainage swales to filter runoff to background levels.
2. **Stockpiling/Staging Areas.** During construction, stockpiling and staging areas will be sited away from sensitive areas and San Mateo Creek.
3. **Sewer Service.** There are two alternatives for providing sewer service to San Mateo Point housing area. They are (1) to utilize sewer services provided from the City of San Clemente or (2) to utilize Camp Pendleton's own Sewage Treatment Plants for sewer service to the site.

Camp Pendleton's preferred alternative is to utilize sewer services provided from the City of San Clemente. Excess capacity currently exists within the City's Sewage Treatment Plant, and the City has approached the Base asking that they (City of San Clemente) be allowed to provide sewer services to the new San Mateo Point housing development.

Two meetings have now been held between Camp Pendleton and San Clemente representatives to discuss the City's capability for provision of sewer services to this site. The only issue to be resolved is the question of economic viability.

In the event that the San Clemente alternative is determined to be less economically viable, the Base will implement its second alternative for sewer service by constructing a sewer line to the south of San Mateo Point. This new sewer line would connect San Mateo Point to the San Onofre Sewage Treatment Plant (STP) located southeast of the site. As discussed in the Draft Environmental Assessment for this project, a sewer line constructed to the south of San Mateo Point would be installed underground within an existing disturbed/paved area (old Highway 101) of the Base. This sewer line will be attached to the old Highway 101 bridge structure, thus preventing direct impacts to the creek itself during both the installation and operation of the sewer system. Construction of the San Mateo Point sewer line will be accomplished in strict compliance with established County of San Diego standards and Best Management Practices. Camp Pendleton has committed to the installation of shutoff valves in the sewer line as one additional means of protection to the local environment in case of the unlikely event of a sewer line might break.

4. **Prohibition of Domestic Animals.** Residents of the housing area will be precluded from possessing domestic animals. The MCB Camp Pendleton Housing Office will be responsible for implementing this policy, which is also in effect in another Base housing area. The Housing Office has the authority to discipline, to include eviction, for violation of this policy.
5. **Street Width.** The project design will dictate a street width of 32 feet, vice the originally planned 40 foot width.

6. **Beach Access During Construction.** The existing public access to the State Park Beach will remain open during and after construction of the project.

ADDITIONAL POINTS

1. **Fencing.** There is an existing eight-foot chainlink fence which is generally located along the top edge of the San Mateo Point bluff, which overlooks the adjacent embankment sloping downward toward the Trestles beach access trail. This existing eight-foot fence will remain along the edge of the bluff top, and, where necessary, be realigned so that it runs the entire length of the top edge of the bluff. Our project will then add an additional six-foot, vinyl-clad fence, located 100 feet inland from the eight-foot fence. The new fence will be used to clearly define the 100-foot buffer area which will separate the developed area from the adjacent embankment. The new fence and the 100-foot buffer area will extend to the limits of development to separate all houses from the slopped embankment on the southeast side of the site. For Phase I development, the six-foot fence will wrap around and close off the south (ocean bluff) side of the development before ending. Upon construction of the Phase II housing, the six-foot fence would be realigned and extended to create the 100-foot buffer along the entire length of the developed area on the southeastern side of the site.

2. **Water Quality Monitoring.** As noted in the consistency determinations for this proposed housing project, Camp Pendleton will maintain, and will provide to the Commission staff, a water quality and vegetation monitoring plan adequate to protect San Mateo Creek and adjacent areas from adverse effects which would significantly degrade the creek and adjacent areas, and to maintain natural slope vegetation. We will maintain these programs during the construction of Phase I of the project and for a two-year (non-drought) monitoring period thereafter, and during the construction of Phase II of the project and for a two-year (non-drought) monitoring period thereafter. We will provide the results of these monitoring programs during each of these periods to the Commission. If this monitoring indicates significant degradation is occurring as a result of stormwater runoff from the San Mateo Point development, the Marine Corps will undertake appropriate remedial actions. Additionally, we will provide the Commission with a final site plan for the detention basins and outlet pipes when they are completed.

3. **Demolition of Existing Structures.** All existing buildings on San Mateo Point (excluding the Coast Guard Loran facility) will be demolished during Phase I of the proposed project.

4. **Wire Mountain and DeLuz Housing Areas.** The proposed housing for Wire Mountain and DeLuz is in the engineering stage; specifically we are in the process of preparing a Site Engineering Investigation. In addition, both biological and archeological studies are underway. In an effort to conserve declining Department of Defense funding, MCB Camp Pendleton has chosen to contract for both biological and archeological studies, prior to starting a full NEPA document. These biological and archeological studies will then be incorporated into the NEPA document, as appropriate. We will also accomplish the required coordination with the California Coastal Commission, which would appear to be a negative determination.

In response to your request for copies of the conceptual site plans for Wire Mountain and DeLuz, these conceptual plans were developed when only surface level engineering and environmental impact analysis had been completed. Since the completion of the conceptual site plan, we have found additional engineering and environmental constraints which will require significant changes to

Encl (2)

the conceptual site plans. As we now know these site plans are not accurate, we do not want to create further misunderstandings or confusion through the release of these inaccurate original conceptual plans.

Funding for planning and construction of the Wire Mountain and DeLuz sites are in the FY97 and FY98 Department of Defense budgets. The San Mateo Point project funding was part of the FY93 Department of Defense budget.

The Stuart Mesa and Del Mar areas of the Base are at full capacity for housing construction. The Base has no plans to locate military family housing adjacent to the Ranch House for the following reasons: the Ranch House is a known National Register eligible historic structure on the base, there is also a National Register eligible pre-historic site on the Ranch House property, the Ranch House and surrounding property is located within the 100-year flood plain, and it is within the 65-70 CNEL noise zone for the Marine Corps Air Station, Camp Pendleton.

5. Potential for Officer Housing in the Wire Mountain Area. As previously noted, additional junior enlisted housing is programmed for the immediate Wire Mountain Housing Area. The proposed Wire Mountain West site encompasses the available, unconstrained area between the existing Wire Mountain Housing Area and Vandegrift Blvd., in the vicinity of the Base's front gate. Reasons why other areas in the vicinity of Wire Mountain are not a suitable alternative for the junior officer housing proposed to be constructed at San Mateo Point include:

- a. Housing in this area would not meet the identified need for additional junior officer housing in the northern portion of the Base.
- b. The location east of and adjacent to Vandegrift Blvd., north of the programmed Wire Mountain West site, has been reserved for future commercial development in light of its proximity to the existing commissary, which is on the west side of Vandegrift Blvd.
- c. Much of the remaining area east of Vandegrift Blvd., north of the programmed Wire Mountain West site, contains California gnatcatcher habitat in the form of coastal sage scrub.

6. Residents of San Mateo Point Housing. There is no definitive period for military personnel (officers or enlisted) to remain in on-base housing, once assigned. Typically, the average stay is approximately three years; however, individually-related circumstances affect the actual length of stay.

Company grade officers living at San Mateo Point would not be limited to an assignment at one specific northern cantonment area. Instead, they may be assigned for duty to organizations or units located at any one of several northern Base cantonment areas.

In general, military units attempt to conduct training activities within the ranges and maneuver areas, which are designated to accommodate the particular type of training, e.g., live fire, small arms; scouting and patrolling, etc, that are closely located to their specific cantonment areas to save both time and transportation dollars. However, there are no rules that prohibit units from utilizing any

Encl (2)

suitable and appropriately designated ranges or maneuver areas on Camp Pendleton to accomplish their training objectives.

In some cases, depending on the type of training to be conducted or in connection with participation in special exercises or large-scale maneuvers, units may conduct training throughout all portions of Camp Pendleton. For example, infantry units assigned to Camp San Mateo can only conduct realistic amphibious assault training along the coastal water and beach areas of Camp Pendleton. Artillery units assigned to Camp Las Pulgas can only conduct realistic long range artillery firing activities by shooting from Artillery Firing Areas (AFA) such as 7 (at the western end the Base) or 39 (at the eastern end of the Base).

7 USF&WS Evaluation of Sites at San Mateo Point, San Onofre, and Surfrider Alternative. MCB Camp Pendleton met with representatives of the USFWS-Carlsbad Office on 12 September concerning the alternatives proposed for examination by the Coastal Commission staff. They do not feel compelled to conduct a site visit, as they expressed familiarity with the areas under consideration, and the sensitive species resident therein, as well as Base management plans, Geographic Information System layers, and Foothill Transportation Corridor (TCA) maps of resources. The Service confirmed Camp Pendleton's initial evaluations of the Surfrider and San Mateo Point Alternatives, in that the San Mateo Point alternative as proposed by the Base clearly represents significantly less impacts to sensitive species, wetlands, and floodplains than that proposed by the Surfrider community. Further analysis of the San Onofre Alternative will occur the afternoon of 16 September, when the Service has the opportunity to review the Environmental Assessment in more detail. We will attempt to persuade the Service to reduce these opinions to writing in some form (note: these are not opinions resulting from formal consultations); if that effort is not successful, we will request that the Service phone the Coastal Commission staff to discuss these issues.

8. Landscaping Maturity. As you know, we intend to screen our houses through an aggressive tree planting program along the entire southeastern side of the San Mateo Point blufftop. This screening effort is being undertaken primarily to reduce/eliminate the visual effects of this development as seen by motorists traveling northbound on I-5. While we believe that no additional tree planting would be required to screen views of the Phase I houses from most beach locations downcoast of the site, the planting to screen the project from I-5 will significantly augment the currently existing screening from the beach views. As I'm sure you remember during the September 9th visit to the site, the general area of placement for Phase I houses could not be seen from locations on the beach between the estuary and 1/4 to 1/2 mile downcoast. This was due, as you may recall, to the presence (and maturity) of trees already located along the southeastern portion of the bluff top. Most of these trees will remain in place following construction of Phase I.

The general area of placement for Phase II houses, however, would be minimally visible from these same beach locations. However, as you may also remember, because of modification of our site plan (in which Phase II houses were repositioned an additional 200 feet further from the coastal bluff), only one or two of the Phase II houses would be partially visible from this beach area. We are committed to creating sufficient screening to adequately obscure these Phase II houses from both the

beach locations and from I-5. As we previously indicated, this Phase II screening will be planted at the same time as the Phase I landscaping.

Based upon the assessments of a qualified consultant, we anticipate that screening will be achieved with fast growing trees suited to this coastal site. The main species would be Pines, Myoperum, California Pepper, Melaleuca, and Eucalyptus. If planted from 15 gal., trees would be approximately 6'-8' at planting, with a growth rate of 2'-3' per year. At five years, expected height would be 16'-23'. Intermittent planting of 24" box trees would start at 9'-11' height, and in five years could be expected to reach 20'-26' in height. These growth rates are conservative, with the proposed species frequently gaining 3'-4' per year in height.

We also commit that in the event this vegetative screening planting were to fail, we will vigorously pursue the program until adequate full screening has been achieved from these views..

9 Potential Housing in the 16 Area. Our conceptual site plan estimated approximately 950 units at the HQ/16 Area. To clarify, the HQ/16 Area is not currently developed with uninhabitable family housing, but is developed with various buildings that are currently utilized mostly as warehousing and office space. These buildings are primarily World War II vintage temporary structures which have been periodically rehabilitated to meet current needs. They are in need of demolition. These buildings have never been used for military family housing and the costs to convert them to such, even if possible, would be prohibitive.

In order to accurately identify the costs and time associated with development of the HQ/16 Area, a full Site Engineering Investigation and NEPA document would need to be completed. Since this process has not started for the HQ/16 Area, we are providing the following responses to your specific questions, however, we in no way feel comfortable that these costs would remain the same after further evaluation of the site.

Our initial estimate for costs to prepare the HQ/16 Area for new development, including demolition, asbestos abatement, lead paint abatement, Phase II Hazardous Materials testing, and building construction is approximately \$114,000,000 (estimate based on current Navy projects). This estimate does not include yet to be identified costs such as; NEPA mitigation requirements (traffic, biological, cultural); grading costs; potential remediation costs identified from Phase II Hazardous Materials testing; or unidentified costs that could be associated with demolition of numerous existing structures and utility systems.

In addition to the costs associated with the development of the HQ/16 Area, the timeframes associated with this development are still yet to be determined. Not counting the 2-5 year Department of Defense budget cycle, the buildings on the HQ/16 Area site are currently occupied, as stated above. Camp Pendleton would have to relocate these activities to other available buildings on the base. As we discussed during your visit on September 9, 1996, space for any kind of development is very limited throughout the base due to our training mission, environmental constraints, topographic constraints, etc. To make this process even more difficult, Camp Pendleton is a "gaining" base, which means additional troops and equipment are being moved to Camp Pendleton due to BRAC. This circumstance further limits space throughout the base for relocation

Encl (2)

of any existing activities. Accordingly, we do not expect the HQ/16 Area to be developed for new family housing for several years.

In contrast, the estimated costs associated with the Marine Corps commitment to provide an architectural design that is consistent with the surrounding community and some of the enhanced landscaping at San Mateo Point is approximately a 10% increase per unit, which when prorated for the entire project, would equate to approximately \$10,000 per unit.

10. **Mosquito Abatement.** We have been advised that either TEKNAR or VECTOBAC may be utilized to achieve the necessary vector control. We will discuss the use of these agents with the U.S. Fish and Wildlife Service to ensure they will have no adverse impacts to the creek or the tidewater goby population. We will advise you of the final plan for vector control before it is implemented. This program will also be coordinated with the County of San Diego Department of Environmental Health.



UNITED STATES MARINE CORPS
WESTERN AREA COUNSEL OFFICE
BOX 565231
CAMP PENDLETON, CALIFORNIA 92055-5231

IN REPLY REFER TO:
11300
CWB
17 Sep 96

Ms. Tania Pollak
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, California 94105-2219

VIA FAX

Re: San Mateo Point Housing Project
(CD-100-96 and CD-101-96)

Dear Ms. Pollak:

In response to your questions to Andrea Marks, during your 16 September telephone conversation, relating to the planned commercial development in the Wire Mountain Housing Area vicinity, the following information is provided. Please refer to the attached map, which is a extract from the Camp Pendleton map which you were previously provided.

As you will note, the commissary and adjacent parking area are located to the west of Vandegrift Blvd. Commercial development is planned for the area immediately south of the parking lot; this developed area will encompass about 8 acres.

Immediately to the east of this area, across Vandegrift Blvd., you will note two large areas of California gnatcatcher habitat. The southern-most of these habitat areas is roughly estimated to be 40-45 acres, while the northern crescent-shaped area is roughly estimated to be 75-80 acres. Long range plans include possible commercial development, consistent with environmental constraints, in this area.

Hopefully, this answers your questions. Please contact us should you need additional information.

Sincerely,
Richard G. Walls
RICHARD G. WALLS
Counsel

Enclosure

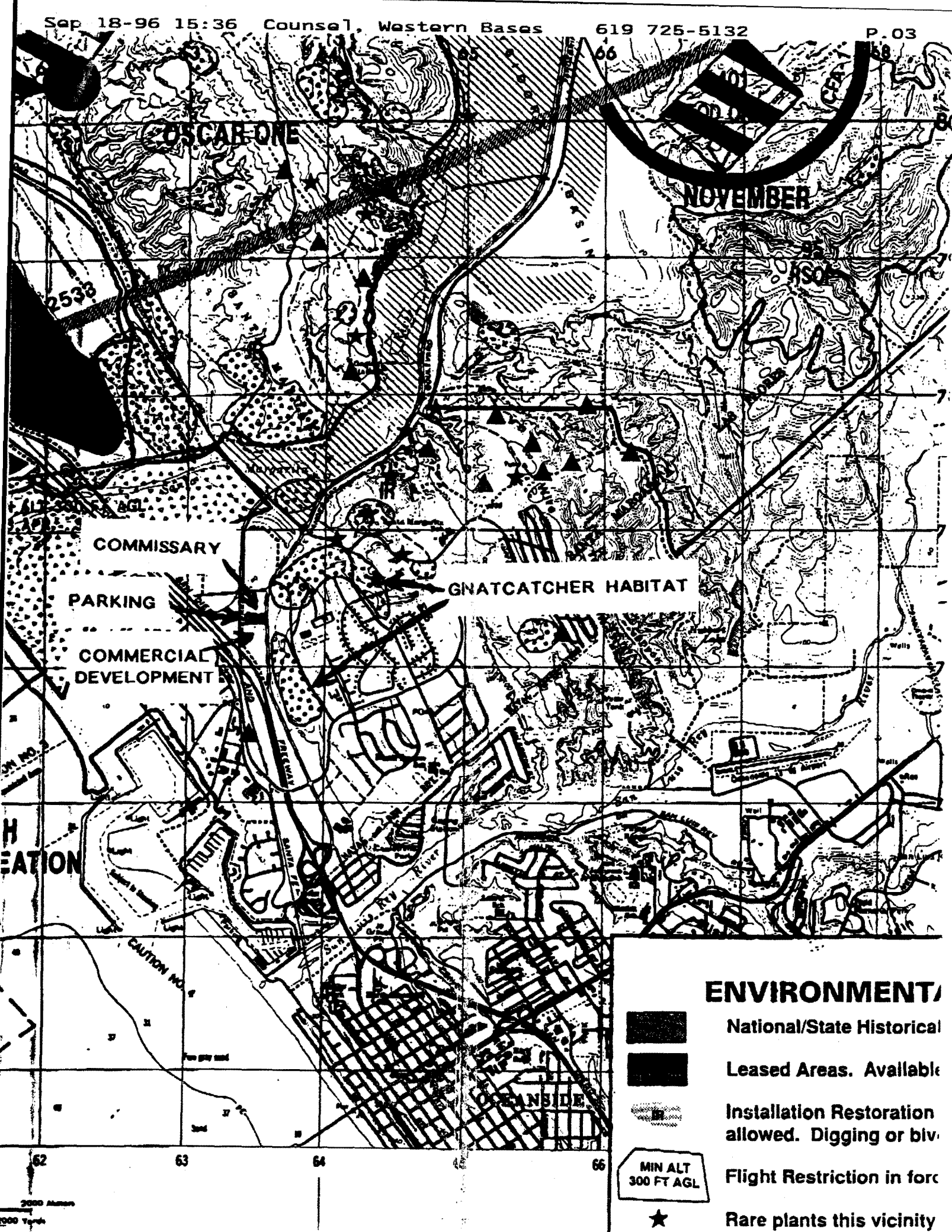
Copy to:
Andrea Marks, SWDiv
WACO
CP&LO
PWO

EXHIBIT NO. 13

APPLICATION NO.

CD-100-96 &

CD-101-96



ENVIRONMENT



National/State Historical



Leased Areas. Available



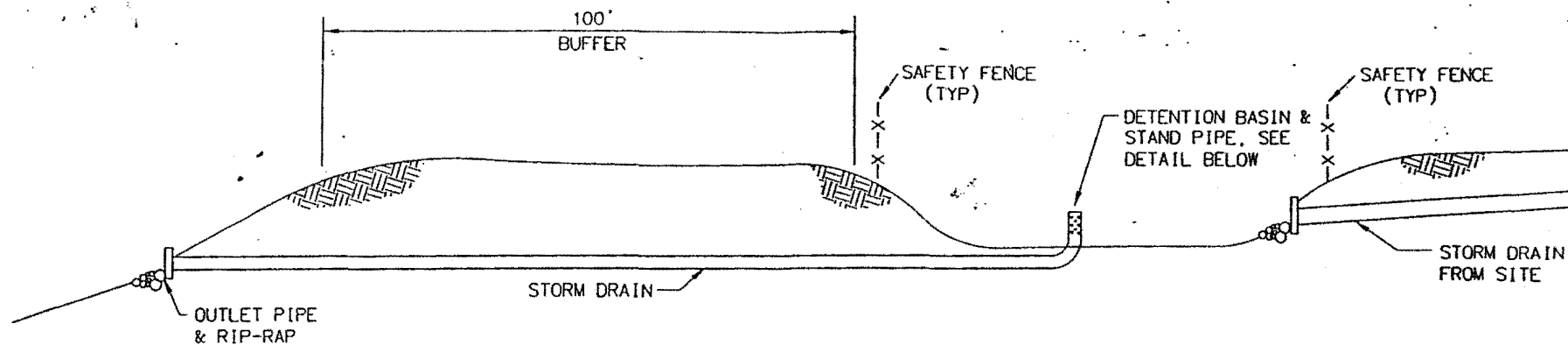
Installation Restoration
allowed. Digging or biv.



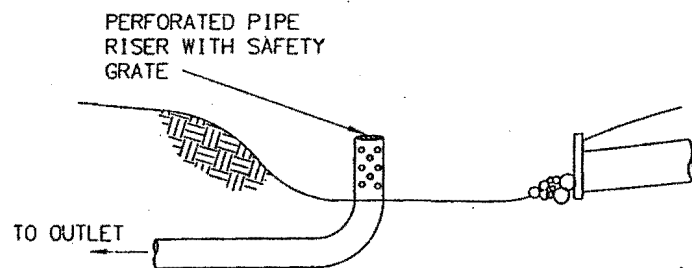
Flight Restriction in force



Rare plants this vicinity



DETENTION SYSTEM
NO SCALE



DETENTION BASIN & STAND PIPE
NO SCALE

SAN MATEO POINT FAMILY HOUSING
MARINE CORPS BASE CAMP PENOLETON
Drainage Detention / Erosion Details

JN 501236-1

STATE OF CALIFORNIA — RESOURCES AGENCY

PETE WILSON, Governor

DEPARTMENT OF PARKS AND RECREATION

Orange Coast District
3030 Avenida del Presidente
San Clemente CA 92672
(714) 492-0802



September 19, 1996

Tania Pollak, Federal Consistency Analyst
California Coastal Commission
45 Fremont, Suite 2000
San Francisco CA 94105-2219

Subject: Proposed San Mateo Point Housing Project

Dear Tania:

The Department would like to provide comment on two new components of the housing project that were not a part of the plan during the public comment period for the Draft Environmental Assessment. Specifically, the plant selection for screening and the adequacy of storm runoff devices are questioned.

The list of plants selected to provide screening along the bluff edge contain a number of non native, invasive species that could easily invade native habitat in both Coastal Sage Scrub and Wetland areas. In particular, the listed tree species of *Myoporum*, Pepper, and *Eucalyptus* are prone to spread and cause habitat damage in especially wetlands. Many *Eucalyptus* species can grow tall and thin so as not to provide screening at all.

The proposed detention basins may not be of adequate size to handle the increased volume of urban runoff created by this project. Although they have a functional design, there should be provisions for long term maintenance as the basins become silted in and their volume reduced. Of the two drains from detention basins, the inland drain flows down a paved road and should have little impact. The coastal drainage ends near the bluff edge with a pile of rocks for energy dissipation. From that point, the water flows over steep ground under coastal sage scrub habitat. We believe this design will cause accelerated erosion and take of critical habitat in the long term. Water should be carried to the base of the slope and have energy dissipation included at that point to minimize resource impacts.

If you have any questions regarding these comments, please call David R. Pryor, District Resource Ecologist at (714) 842-6135.

Sincerely,

Jack B. Roggenbuck
District Superintendent

cc: Rayburn
Pryor

EXHIBIT NO. 15
APPLICATION NO.
CD-100-96 &
DCD-101-96