

## CALIFORNIA COASTAL COMMISSION

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## Staff Report and Recommendation on Consistency Determination

### Consistency Determination

No. CD-128-95

Staff: TNP-SF

File Date: 12/28/95

45th Day: 2/11/96

60th Day: 2/26/96

Commission Meeting: 2/7/96

Federal Agency: U.S. Navy

Development Location: North and South Delta Beach, Naval Amphibious Base,  
Coronado, San Diego County (Exhibit 1).

Development Description: Beach habitat enhancement for California least tern nesting  
(Exhibit 2).

Substantive File Documents: CD-95-95 (Navy Nimitz Homeporting)

### Executive Summary

On December 28, 1995, the Commission received a consistency determination from the Navy for habitat enhancement at North and South Delta Beach, Coronado. The project is necessary to protect nesting colonies of least terns, a federal and state listed endangered species. The project will move approximately 60,000 cubic yards of sand from the Pacific Ocean side of the beach to the San Diego Bay side of the beach. The project will not affect the intertidal or dune areas. However, the project is located within a highly eroding shoreline. The loss of sand from the littoral cell reduces the availability of sand to nourish other beaches in the cell, potentially leading to impacts on shoreline erosion and recreation opportunities. However, these impacts are reduced by the fact that the Navy is placing large amount of sand from other projects in the area within the same littoral cell, including up to 1.5 million cubic

yards at Imperial Beach from the Homeporting project. This sand will provide additional material for beach nourishment.

The Coastal Act places a high importance on both the protection of sensitive resources and coastal recreation, and requires that access be managed consistent with protection of fragile resources. Section 30007.5 of the Coastal Act addresses situations where conflicts may occur between sections of the Act. This section provides that any such conflicts be resolved in a manner which on balance is most protective of the resources. In this case, the habitat enhancement necessary to protect a sensitive resource outweighs the project's impacts to shoreline erosion and recreation opportunities. The project is therefore consistent with the Coastal Act.

Staff Summary and Recommendation:

I. Staff Summary

A. Project Description: The Navy proposes to enhance nesting habitat for the California least tern (*Sterna antillarum browni*) at Delta Beach, Naval Amphibious Base, Coronado). California least terns nest on sandy beaches. The poor sediment quality at Delta Beach has been attributed to a recent decline in the nesting population of the colony at Delta Beach.

The proposal will cover approximately 35 acres of beach with one foot of sand (Exhibit 2). Dump trucks will be used to transfer coarse sand from the Pacific side of Delta Beach to the beach on the San Diego Bay side. A maximum of 60,000 cubic yards will be transferred. No sand from the intertidal area will be removed.

B. 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 City of Coronado LCP has been certified and incorporated into the CCMP.

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

## II. Staff Recommendation:

Staff recommends that the Commission adopt the following resolution:

The Commission hereby concurs with the consistency determination made by the U.S. Navy for the proposed project, finding that the Navy's project is consistent to the maximum extent practicable with the California Coastal Management Program.

## III. Findings and Declarations:

The Commission finds and declares as follows:

### A. Environmentally Sensitive Habitat:

Section 30240 of the Coastal Act provides for the protection of sensitive habitat areas. This section states, in part:

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

In its consistency determination, the Navy states that "[r]ecent declines in nesting populations for the California least tern (*Sterna antillarum browni*) at North and South Delta Beach have been attributed to poor sediment quality (texture)." The least tern is a federally and state listed endangered species. The U.S. Fish and Wildlife Service believes that site enhancement with coarse beach sand is critical for the continued success of the Delta Beach nesting colony. The proposed project would provide the quality of sand necessary for the nesting colony by transferring approximately 60,000 cubic yards of sand from the Pacific Ocean side of Delta Beach to the San Diego Bay side. The sand will cover 35 acres of beach at North and South Delta Beach with one foot of sand. (See Exhibit 2 for locations of beach enhancement.)

No sand will be taken from the intertidal area, and therefore, the project will not negatively affect the sensitive resources in the intertidal zone. Further, the Navy has committed to use existing paths cut through the dunes to reach the sandy beach area for sand removal. By utilizing existing disturbed areas of the dunes, impacts on these sensitive resources will be prevented.

Western snowy plovers (*Charadrius alexandrinus nivosus*) also nest at North and South Delta Beach. The snowy plover is also a federally threatened and state-listed endangered species. The project will not negatively affect the snowy plover populations at the site as beach enhancement activities will be coordinated with U.S. Fish and Wildlife Service,

and will stop before the plover nesting season, March 15. Any activity beyond that date will only occur if U.S. Fish and Wildlife Service agrees to it, and if it would not affect the plovers.

With these measures, the Commission finds that the project will not adversely affect any environmentally sensitive habitat area. Since the purpose of the project is habitat enhancement, the project is highly encouraged by Section 30240. The Commission has previously approved placement of sand on a beach area to enhance least tern nesting (see CD-95-95, Nimitz Homeporting). Therefore, the Commission finds that the project is consistent with Section 30240 of the Coastal Act.

**B. Public Access:** Sections 30210 through 30212 of the Coastal Act require public access opportunities to and along the coast to be protected and maximized, consistent with public safety, resource constraints, and military security needs. 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.

The project will not affect physical access opportunities as the project is at a Navy restricted zone where access is not currently available. In reviewing past Navy activities at the Naval Amphibious Base, the Commission has traditionally determined that legitimate military security needs in situations where public access burdens are not generated by proposed activities means that no additional public access needs to be provided in order to find the project consistent with Coastal Act policies on access. This project will not generate any burdens on public access opportunities. Therefore, the Commission finds the project consistent with the public access policies of the Coastal Act.

**C. Shoreline Resources and Recreation:**

Section 30253 of the Coastal Act states, in part:

New development shall:

...

- (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.

...

Section 30220 of the Coastal Act requires the protection of coastal recreation opportunities. Section 30220 states: "Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses."

The project will remove approximately 60,000 cubic yards of sand from the littoral cell in an area that is highly erosive. The loss of the sand from the Pacific side of Delta Beach leads to more rapid erosion of the beach. Loss of sand supply also ultimately affects recreational opportunities upcoast from the site by reducing the amount of material available to nourish these other beaches, thereby minimizing the effects from natural erosion. According to the U.S. Army Corps of Engineers' *Silver Strand Littoral Cell Preliminary Sediment Budget Report* (1987), the removal of 60,000 cubic yards of sand is equivalent to an average of three years natural loss of sand from the littoral system.

The City of Coronado has raised concerns regarding the traffic impacts from this project (Exhibit 3). Under the Coastal Act, the Commission's main concern with traffic is the impact on recreational travel. The project will involve approximately 10,000 truck trips to move the sand from one side of the beach to the other. The trucks will cross Highway 75, which is a major recreation route. However, while the project will add traffic to the region surrounding Delta Beach, the Commission finds that the additional traffic is temporary and will not affect coastal resources. Trucks will not be brought in via Coronado Bridge or northbound along Highway 75, both of which are heavily traveled routes. Further, traffic will not travel through downtown Coronado or Coronado Cays. Truck traffic will occur during non-peak hours (8:30 to 3:30) to further minimize any potential impacts to congestion, and warning signs will be placed regarding truck traffic. In addition, the project is not occurring during the peak recreation season, and will finish by mid-March. The City of Coronado has also raised the concern of cumulative impacts on traffic with other Navy projects. However, this project will be completed prior to the commencement of other planned Navy projects in the area that will result in traffic impacts. The Commission therefore finds that the traffic generated from the project will not adversely affect recreational opportunities.

Nevertheless, due to sand removal from the littoral system, the project could be considered not fully consistent with Sections 30253 and 30220 of the Coastal Act. At the same time, beach nourishment activities undertaken as part of other projects in same littoral cell will reduce the impact from sand loss associated with this project. Approximately 1.5 million cubic yards of sand generated from the Nimitz Homeporting project will be used for beach replenishment in the Silver Strand littoral cell. Therefore, the overall impacts from this project on shoreline erosion and coastal recreational are reduced. Further, the Coastal Act envisions situations where there may be a conflict between Chapter 3 policies and provides specific guidance on how these conflicts should be resolved; in this case, the conflict is between sensitive resource policies on the one hand and erosion and recreation policies on the other hand. This resolution is discussed in Section D.

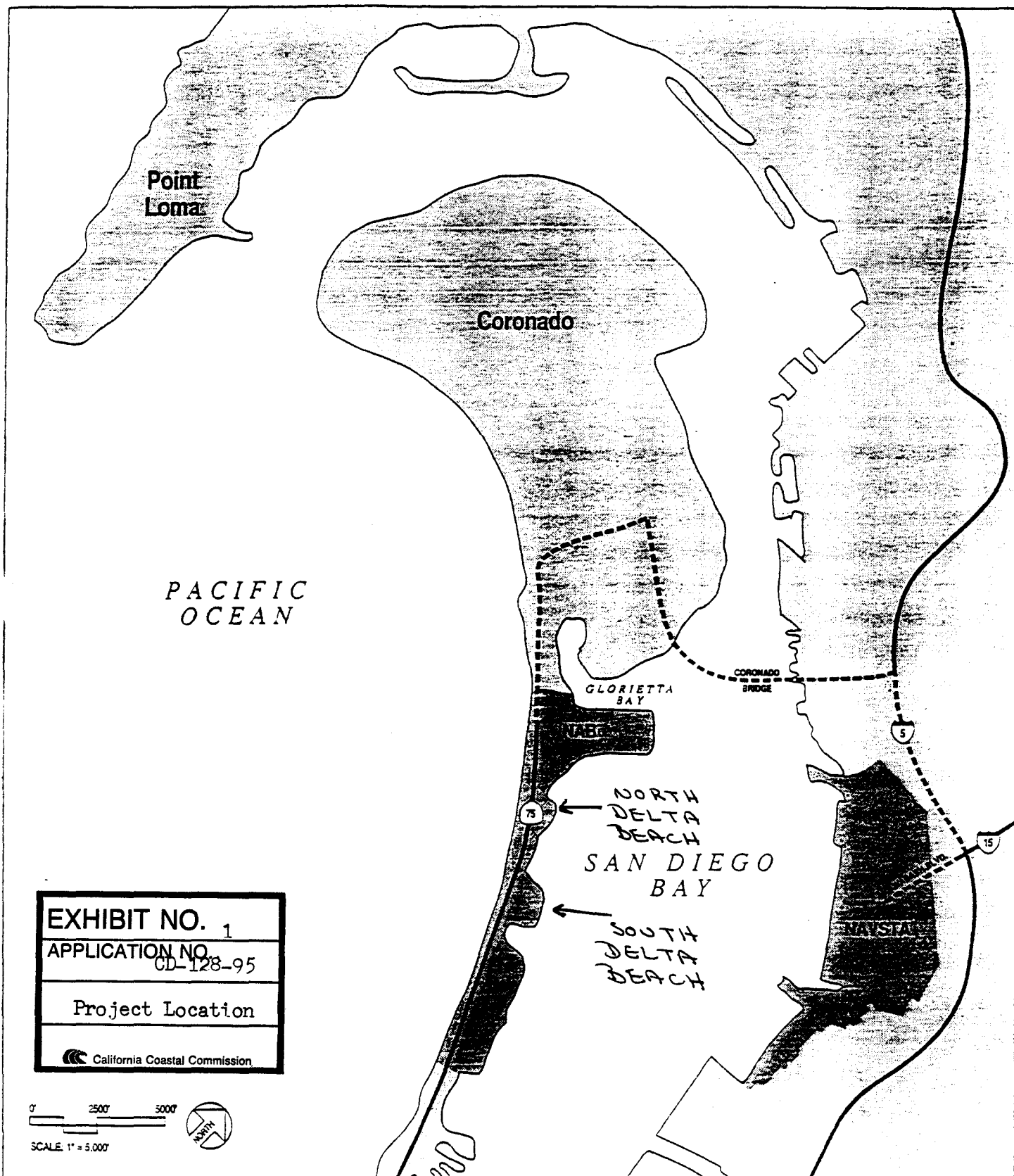
**D. Conflict Resolution:**

Section 30007.5 of the Coastal Act provides:

The Legislature further finds and recognizes that conflicts may occur between one or more policies of the division. The Legislature therefore declares that in carrying out the provisions of this division such conflicts be resolved in a manner which on balance is the most protective of significant coastal resources. In this context, the Legislature declares that broader policies which, for example, serve to concentrate development in close proximity to urban and employment centers may be more protective, overall, than specific wildlife habitat and other similar resources policies.

As discussed above, the proposed project will lead to impacts on sand supply in the Silver Strand littoral cell, and will affect recreation opportunities. However, the project is necessary to protect the California least tern, an endangered species. The Coastal Act places a high emphasis on the protection of sensitive resources, which includes endangered and threatened species, and requires that access be managed consistent with fragile resource policies. For this project, the impacts to sand supply and recreation opportunities are necessary to ensure protection of a sensitive resource.

Although this project will lead to impacts on sand supply, approximately 1.4 million cubic yards of sand will be placed within the littoral cell at Imperial Beach through the Navy Nimitz Homeporting project. The Commission concurred with this consistency determination at its November, 1995 hearing (CD-95-95). The Commission finds that based on Section 30007.5 of the Coastal Act that it would be most protective of significant coastal resources to allow this project to proceed. The Commission therefore concludes, given the habitat benefits from the project and the offsetting benefits to the littoral cell from the Homeporting project, that the project is consistent with the Coastal Act.



Source: NAB Coronado Master Plan (U.S. Navy, 1989)

FIGURE 1

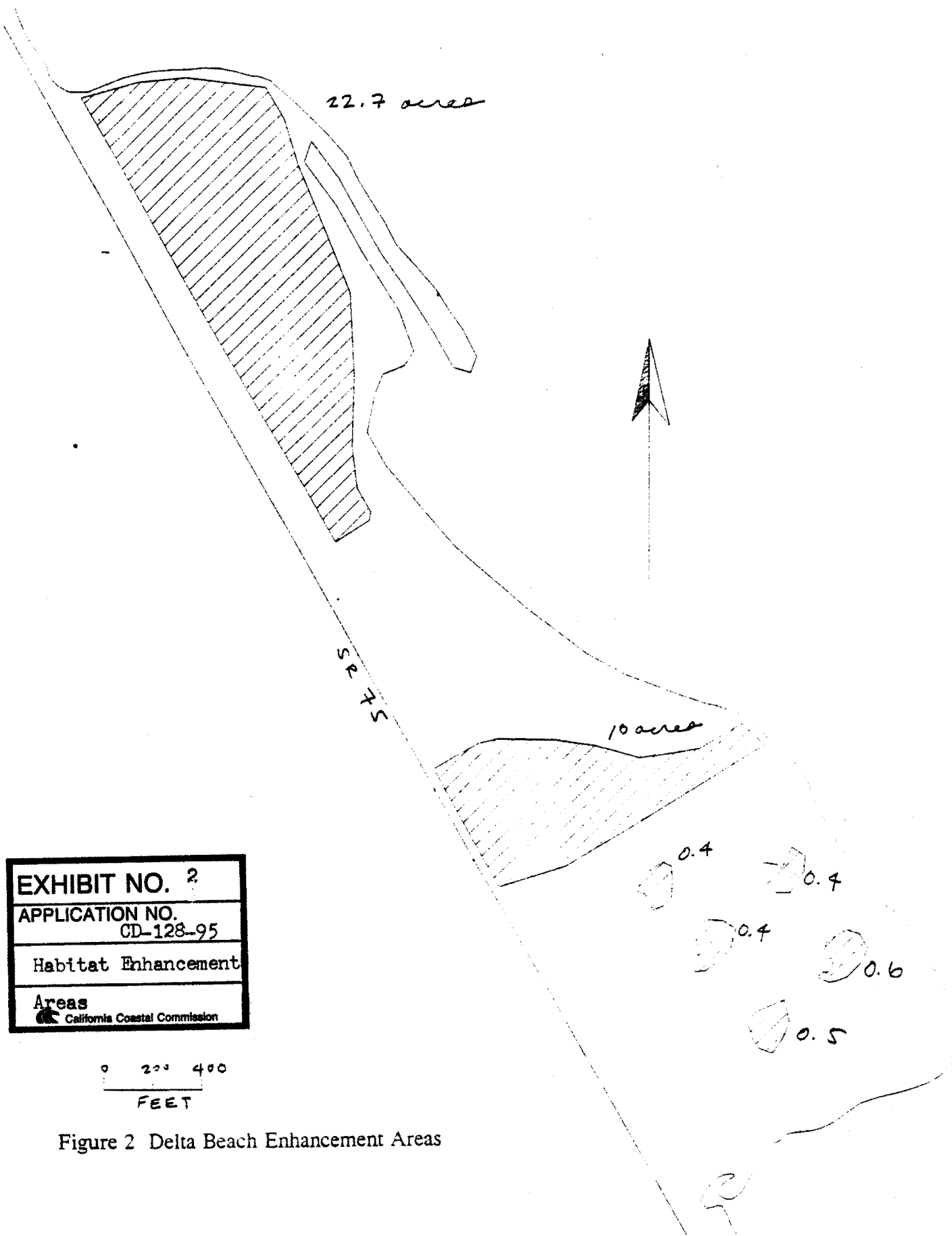


Figure 2 Delta Beach Enhancement Areas





## CITY OF CORONADO


JAN 22 1996  
CALIFORNIA  
COASTAL COMMISSION

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January 17, 1996

California Coastal Commission  
Attn.: Mark Delaplaine  
45 Fremont, Suite 2000  
San Francisco, CA 94105-2219

EXHIBIT NO. <sup>3</sup>
APPLICATION NO. <sup>3</sup> CD-128-95
Letter from City of Coronado
 California Coastal Commission

Re: Federal Consistency Determination application for Delta Beach Least Tern  
Nesting Site Enhancement

Dear Mr. Delaplaine:

The City of Coronado appreciates being forwarded a copy of the above mentioned document and has the following comments and or questions relative to this project.

1. Is a formal public hearing to be conducted on this project? If so, when is the hearing date?
2. Has any environmental analysis been completed for this project? If environmental analysis has been completed, the City of Coronado --which is the City where the project is located -- was not given an opportunity to review the document or comment on the environmental determination and would request a copy of the document. If the environmental analysis has not been completed, how can the Coastal Commission take action on a project prior to environmental review?
3. The project involves the relocation of 60,000 cy of sand from the beach side to the bay side along Silver Strand Highway 75. Assuming standard 10 yd dump trucks are used, this project will generate approximately 6,000 truck trips within the City. What is the exact size of the trucks proposed to transport the sand and how many truck trips are projected to be generated each day with this project?
4. What is the proposed truck route for the trucks entering and exiting the City each day? Will the trucks be arriving via the Coronado Bridge or North Bound along Hwy 75? Both of these routes experience heavy volumes of traffic in the morning and afternoon hours and this project (and associated truck traffic) will cause impacts to existing traffic conditions -- especially when combined with other construction projects currently planned by the Navy at both NASNI and NAB.

5. What is the proposed truck route for transporting the sand from one side of Hwy 75 (beach side) to the other side (bay side). Where is the proposed turn off location along the beach side? There are no deceleration lanes along the beach side of the highway or large maneuvering areas for turning onto the beach. How and where will the trucks enter the beach without encroaching and impacting vehicles traveling southbound along the freeway?
6. What are the proposed hours of sand transfer?
7. Has a truck/traffic management plan been prepared for this project?
8. What type of traffic control is proposed for this project?
9. What method of sand control is proposed with the sand lifting and transport?
10. Historically, bay dredge spoil has been used to replenish the Silver Strand beach since natural conditions are inadequate to maintain the sand resource. Why rob a public resource that is an important "sand bank" that helps keep the stretch of beach to the north (Central Beach) replenished for active recreational purposes - a major goal of the Coastal Act?
11. What impacts will occur regarding the removal of 60,000 cy of sand from an eroding beach?

The City of Coronado requests that these questions be addressed prior to Commission action on this project. In addition, the City requests an adequate period of time to review the Navy's responses to these questions and provide input, if necessary, on methods to minimize traffic impacts. If you have any questions regarding our comments, please contact Ann McCaull at 522-7326. Thank you for your time and consideration.

Sincerely,



Homer Bludau  
City Manager

cc: Krauel & Krauel  
Quinton & Petix  
Director of Community Development  
Director of Engineering & Project Development  
Director of Police Services

cd/am/nabsand