

CALIFORNIA COASTAL COMMISSION

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Staff Report and Recommendation on Consistency Determination

Consistency Determination No. CD-50-95
 Staff: TNP-SF
 File Date: 6/2/95
 45th Day: 7/19/95
 60th Day: 8/3/95
 (Extended to 8/16/96)
 Commission Meeting: 8/14/96

- 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: Construction of 128 duplex housing units for officers, to be constructed in two phases (Exhibits 5-6).
- 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.

Staff Note: On July 24, 1996, the Marine Corps indicated to the Commission staff that it would be submitting additional information regarding the proposed project. The Commission staff has not received this information in time for analysis into this staff report. However, the main text of this information is attached as Exhibit 15. If the Commission staff receives information that warrants a change to the staff's analysis and/or recommendation, the Commission staff will set forth those changes in an addendum to this report.

Executive Summary

On June 2, 1995, the Commission received a consistency determination from the U.S. Marine Corps for construction of 128 duplex units for officer housing at San Mateo Point, Camp Pendleton. 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 are: 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 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. The project 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-renown surfing area. In addition, the Marine Corps has not provided an adequate analysis of the alternatives as requested by the Commission staff. Some of these alternatives would avoid any impacts to coastal zone resources.

The project site is adjacent to San Mateo Creek and an 82 acre wetland reserve. Several federally listed species are found in the sensitive habitat areas adjacent to the proposed project site. The Commission staff has requested additional information regarding impacts to, and mitigation for, the sensitive resources adjacent to the project site. Although the Marine Corps responded to many of the Commission staff's requests, several issues remain outstanding concerning water quality and habitat protection. To find the project consistent with the CCMP, the Commission needs the following commitments from the Marine Corps:

- commitment to ensure adequate maintenance for the detention basins;
- commitment to provide baseline water quality information and to monitor water quality after construction of the project, ideally at both the San Mateo Creek and the discharge outfalls;
- commitment to monitor vegetation in the adjacent sensitive habitat to assure that landscaping for the project does not introduce exotic species of vegetation to the coastal scrub or wetland area;
- commitment to install shut-off valves or other measure to assure protection of San Mateo Creek in the event of a sewer line break, or rerouting the sewer line to avoid the Creek.

In addition, the Commission needs verification that the detention basins are an adequate size to serve as sediment traps and to control runoff for the proposed project. Without this information, insufficient information is available to find the project consistent with Coastal Act sections 30231 (water quality) and 30240 (habitat).

The project will not block public access and is thus consistent with the public access (Sections 30210-30212) policies of the Coastal Act. The project is also consistent with the archeological resources (Section 30244) policies and the geologic stability policy (Section 30253) of the Coastal Act.

Staff Summary and Recommendation:

1. Staff Summary:

A. *Project Description:* The U.S. Marine Corps proposes to construct 128 duplex units for officer housing at San Mateo Point on Camp Pendleton. The project location 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. Currently, only phase one of the project, 76 units (38 duplex buildings), has assured funding (Exhibit 6). These units are planned for the northern portion of the site. Construction of phase 2 (52 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.

The project location encompasses approximately 40 acres, 32 of which would be developed under the full project. 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. The Marine Corps states that it will incorporate a 100 foot buffer between the housing development and the slopes 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.

The site currently contains several structures which were once used by the Coast Guard. These structures, proposed for removal, 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 project includes construction of a sewage line, within a utility corridor, 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 7). The corridor will intercept with Camp Pendleton's sewer main at Basilone Road.

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. 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 I-5.

The Marine Corps states the primary purpose of the proposed action is to provide 128 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. 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.

C. 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.

D. 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.

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.

E. 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 made by the U.S. Marine Corps for 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 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.

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 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 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."

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.

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 project site represents a major transition between the densely developed subdivisions in southern Orange County and the undeveloped natural terrain predominating northern Camp Pendleton. The Commission staff has received numerous letters from the public indicating that the undeveloped character of the area is one of its major attractions for visitors. (See Appendix A for sample letters.)

Development of the proposed project will convert the site to a far more intensive use, with 128 duplex units. Six of these units will be single-story units; the remaining 122 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 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 proposed project incorporates a landscaping plan, designed to be compatible with the existing residential area adjacent to the site (Exhibit 9). 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.

However, despite these efforts, due to its location, the project as proposed will have significant adverse effects on public views from the public beach, the adjacent walkway and bikepath (shown on Exhibit 10), and from Interstate 5. 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 10).

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, 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)

In the Draft Environmental Assessment, the Marine Corps limited its analysis of visual impacts on public views from the northwest corner of the site, from the accessway along the southeastern portion of the site, and from the beach directly below the project location. Due to the topography of the site, more significant visual impacts would occur downcoast from the project site than from where the Marine Corps undertook its visual analysis. Therefore, in a comment letter dated April 30, 1996 (Exhibit 11), the Commission staff requested additional analysis of the visual impacts from the project downcoast of the project site, both along the beach and the bikepath, and from Interstate 5.

In response to this letter, the Marine Corps submitted to staff two computer generated graphics showing the proposed project as seen from Interstate 5 (I-5) and from the beach directly adjacent to the proposed site. The analysis from I-5 is generally comparable to the visual impacts from the bikepath/walkway paralleling the beach and I-5. With the proposed project, development will clearly be visible both from I-5 and from the bikepath/walkway paralleling I-5. In response to the Commission staff's request for analysis of visual impacts from the beach downcoast of the site, the Marine Corps again limited its analysis to a location on the beach adjacent to the southeastern end of the project site. The Commission agrees that the development will not be significantly visible from the beach north of San Mateo Creek. Due to the topography of the area, it is the more southerly viewpoints that are of concern. Based on the available evidence, the Commission believes the project will be visible from this beach viewpoint. The proposed housing will also be visible from the initial stretch of the accessway which borders the northern edge of the project site.

The Department of State Parks and Recreation shares the Commission's concerns. In comments on the Draft Environmental Assessment, the Department also expresses concerns over potential impacts to the visual and recreational character of the site (Exhibit 12). 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.

Because of the highly scenic nature of the project site and surrounding areas, and the fact that the project may affect views for thousands of visitors who annually use this beach and the public walkway paralleling the beach, given the information provided, 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. Because the proposed project 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, the Commission believes feasible alternatives are available which would fully avoid this adverse impact.

2. Alternatives:

Because of the requirement of Section 30251 of the Coastal Act that visual impacts be minimized, the analysis under this section necessarily includes consideration of feasible less damaging alternatives. As discussed in section F below (pg. 17-21), 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.

3. Oceanfront Land:

Finally, the Commission notes that 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' proposal, 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.

4. Conclusion:

The Commission finds that the project has not been sited and designed in a manner that minimizes visual and recreation impacts. 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, 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. Both species, the Riverside and San Diego fairy shrimp, are federally listed species. Construction of the project will cause the fill and loss of the on-site vernal pools and potential habitat for the Riverside and San Diego fairy shrimp. In response to comments on the Draft Environmental Assessment, the Marine Corps initiated a consultation under Section 7 with the U.S. Fish and Wildlife Service. Through that consultation, the Marine Corps has committed to include off-site mitigate 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 southwest 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. In addition, 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. The gnatcatcher has been observed in the coastal sage scrub on slopes below the site, and in habitat adjacent to the utility corridor. 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 proposed project 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. 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 ensure compliance with Sections 30231 and 30240, the Commission staff requested additional information regarding the potential for increased runoff and erosion into the wetland area and San Mateo Creek in a comment letter dated April 30, 1996. Specifically, the Commission staff requested information regarding impacts to the creek from the increased runoff, measures to be taken to ensure that discharge to the creek will not degrade habitat or water quality or modify hydrology, information on what types of vegetation will be used to minimize the need for fertilizers and pesticides, and an analysis of the potential for increased clustering of the units to reduce the extent of impervious surfaces. The Commission staff also requested information regarding what Best Management Practices would be implemented to prevent degradation to the water quality of San Mateo 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 modified their proposed project to incorporate detention basins, outside of the 100 foot buffer area, at the beginning of rough grading for the project (Exhibit 13). 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 estimates that the overall increase in water runoff will be 10.8%.

To further reduce erosion and sedimentation, the Marine Corps proposes to grade only the land designated for Phase 1 of the project. The remainder of the parcel will not be graded until construction of Phase 2 of the project. The Marine Corps has not stated how soon after construction it will revegetate the site in order to further reduce erosion potential.

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. However, the Marine Corps has not provided sufficient information to establish that the size of the basins is adequate or assurance that they will be regularly maintained to ensure their effectiveness as sedimentation traps. In addition, the Commission staff has requested information on water quality monitoring (letter dated April 30, 1996). In a meeting with the Marine Corps, Commission staff further discussed the issue of monitoring water quality. The Marine Corps stated that it currently undertakes a base-wide water quality monitoring program, including at San Mateo Creek. However, the Marine Corps has not committed to providing the Commission staff with information on the baseline quality of the Creek, future water quality monitoring, and ideally, monitoring water quality at the outfall pipes. Monitoring the water quality from the outfall pipes would provide the most accurate assessment of impacts on water quality from the proposed project, as the water quality at this location would be directly tied to the project. The Marine Corps has failed to provide the

requested information. Without the requested information and/or commitments on detention basin size and maintenance, and water quality monitoring, the Commission has insufficient information and is otherwise unable to determine that the project will not result in impacts to sensitive habitat and species in the creek.

b. Sewage Pipe

In addition to the above impacts, the construction of the sewer line 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 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 proposed project.

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. In response to the Commission's staff requests for information on how the Marine Corps will ensure that material stockpiled during construction will not wash down the slopes and into San Mateo Creek, 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. In addition, the Marine Corps has stated that all staging areas and stockpiled materials will be placed away from the sensitive areas and the creek.

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, the Commission staff has discussed with the Marine Corps the possibility of 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. However, the Marine Corps has not committed to implement such a procedure. Without an identified method to protect the Creek in the event of a break in the sewer line, the Commission cannot determine that the project has been designed to fully protect the sensitive potentially affected by the proposed project.

c. Water Supply

Information in the Draft Environmental Assessment indicated that water for the project 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 has 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. The Marine Corps has not committed to either of these measures.

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, but has not indicated how this restriction will be enforced.

The proposed project will also 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 cause significant impacts. However, the project incorporates a 100 foot setback, which will help reduce impacts from noise, although the area will need to 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 Marine Corps has not provided all the details needed to assure the Commission that habitat and water quality in San Mateo Creek would not be adversely affected. Outstanding issues remaining include the disposition or design

of the sewer line across the creek, details related to maintaining the detention basins, details related to monitoring runoff from the site into the Creek, and monitoring of the sensitive habitat adjacent to the project site. Given the information presently before the Commission, the Commission is unable to determine that the project complies with the requirement of Section 30231 of the Coastal Act to maintain biological productivity by controlling runoff and waster water discharges, or with the requirement of 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."

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 is located 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 10). No existing access is provided from the project site to the beach.

Construction of the utility corridor also 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 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:

Because of the impacts this project will have on public views and recreation, the Commission staff requested additional information from the Marine Corps on alternative sites for construction of the project that could avoid the impacts discussed under Section A. In general, the Commission staff requested an analysis of alternatives for locations able to accommodate Phase 1 of the project and locations in both the northern and southern portion of Camp Pendleton able to accommodate the proposed project (see Exhibit 11).

a. Phasing and North Base Sites

Given that only phase 1 of the project is funded, with no guarantee of funding for phase 2, the Commission staff specifically requested that possible sites that could accommodate phase one of the project (76 units) be identified and analyzed. 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 (for examples, see Exhibit 14). Because the Marine Corps has stated that the need for the project is in the northern portion of the base, a number of sites identified by the Commission staff are located in the northern section of Camp Pendleton. The Draft Environmental Assessment did not analyze the feasibility of these areas for the proposed project.

The Marine Corps' response to staff's request is 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.

This language appears to contradict the language in the 1990 Draft Master Plan which identifies appropriate sites in the northern portion of the base for development. Moreover, this broad-brush response does not provide sufficient specific information on alternative sites to enable the Commission to evaluate the Marine Corps' position that feasible less damaging alternatives are unavailable.

In response to the Commission staff's information request, the Marine Corps also states that:

The 1990 Draft Master Plan was finalized in September 1992... . The only site in the North portion of the base that remained at the time of the Final Master Plan was the San Mateo site. [Other sites in the northern areas of the base identified by the Commission staff] were not identified in the Final Maser Plan as reasonable alternatives for family housing... . [Other areas identified by the Commission staff] are in the southern portion of the base and therefore do not constitute reasonable alternatives for the proposed action.

With regards to the areas in the northern portion of the base, the Marine Corps' statement that the other sites identified by the Commission staff are not reasonable alternatives does not provide sufficient analysis for the Commission to determine whether those areas are feasible. The Marine Corps has met with Commission staff and stated its belief that "expansion areas" as shown in that plan are not suitable for residential development, as residential development would be incompatible with other activities. Review of the maps in the Draft Master Plan indicates areas that may be feasible for residential development (see, for examples, Exhibit 14). In at least one location in the north base and a number of locations in the south base, the land use plan maps in the Draft Master Plan indicate housing would be an appropriate use for the buildable areas. Further, a number of locations with additional "expansion areas" already support housing. The Marine Corps has not adequately explained why additional housing is not compatible in these areas. Other locations identified by the Commission staff not identified with any particular development designation in the Draft Master Plan. Development of many of these for the proposed project may avoid any impacts to coastal zone resources.

b. South Base Sites

Although the Marine Corps has stated that the primary need for housing is in the north base, the Commission staff included in its comments consideration of a number of areas in the south base identified in the 1990 Draft Master Plan as suitable for development. This request was based in part on a Marine Corps determination in a 1990 Final Environmental Assessment for housing at Camp Pendleton that development of housing in the south base "maintained an acceptable commute distance." The Commission staff's comments to the Marine Corps state:

Pg. 2-11 [of the 1995 Draft Environmental Assessment for the proposed project] notes that "a large number of Marine Corps personnel are assigned to commands located within the northern portion of the base but live in base family housing areas in the southern portion of the base or in off-base communities, south of MCB Camp Pendleton," resulting in "relatively lengthy commute distances." However, the 1990 Final Environmental Assessment for FY 1990 Family Housing Marine Corps Base Camp Pendleton (September 1990) states that while the San Mateo site is the preferred site for housing, "development of any one of the three alternative sites would serve to reduce the current demand for company grade officer housing *while maintaining an acceptable commute distance.*" (pg. 103 and 1-4, emphasis added.) The alternative sites were the O'Neill site and Del Mar in the South Base area. Why was a south-base to north-base commute acceptable in 1990 but unacceptable in 1996?

In responding to the Commission staff, the Marine Corps states:

As stated in Section 2.5, Purpose and Need for the Proposed Action, there is currently a housing shortage throughout MCB Camp Pendleton; however the greatest need for company grade officer housing exists in the northern area of MCB Camp Pendleton. As stated in the 1990 Final EA, housing alternatives at the O'Neill Heights and Del Mar sites were in direct response to shortages throughout the entire MCB Camp Pendleton, not specifically for personnel stationed in the northern portion. The San Mateo Point

alternative was the preferred alternative in response to lengthy commute distances from the south end of MCB Camp Pendleton.

In response to the Commission staff's requests for information regarding commute distances and any vacancy rates on the Base, the Marine Corps responded as follows:

The Marine Corps Housing Office does not have a database that tracks personnel living in off-base housing. The available data is for those living on-base, therefore; [sic] specific information regarding off-base commute time is unavailable. There is no existing vacancy rate for non-officer housing on-base. As stated on page 1-1 [of the Draft Environmental Assessment] "MCB Camp Pendleton's on-base family housing shortfall has continued to remain in the range of 1,000 [units] or more."

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 area of the base is the only feasible alternative for the proposed project. The Marine Corps has met with Commission staff and stated its belief that developable lands on south base are earmarked for development or future training activities. However, the Marine Corps has not documented these assertions, and the Commission notes that, as stated above, when the San Mateo Point area lacked water for its 1990 housing proposal, the Marine Corps found an acceptable site on south base.

c. Clustering

The Commission staff also requested information regarding a greater degree of clustering of the proposed units, which could increase the setback of the development from the bluff, thereby reducing the visual intrusion of the development. In its response, the Marine Corps stated that increased clustering of the development would "be more intrusive to the adjacent neighborhoods, reduce the protection view corridor and create greater visual impacts when compared to the proposed alternative." The Marine Corps' analysis of increased visual impacts appears to be concerned with views from private residences adjacent to the proposed development. Its analysis does not respond to Commission concerns regarding *public* views from the beach and walkways. However, unless clustering could reduce or avoid the visibility of the project from the beach, the Commission agrees this would not resolve the visual intrusion issue.

d. Conclusion

The Commission believes both that a south base-north base commute represents a typical commute for the San Diego region and cannot be considered an excessive commute, and that other available developable lands exist on the base on which the proposed housing could be built. Camp Pendleton is one of the largest Marine Corps bases in the country, and 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.

2. Alternatives Based on Project Impacts to Sensitive Resources

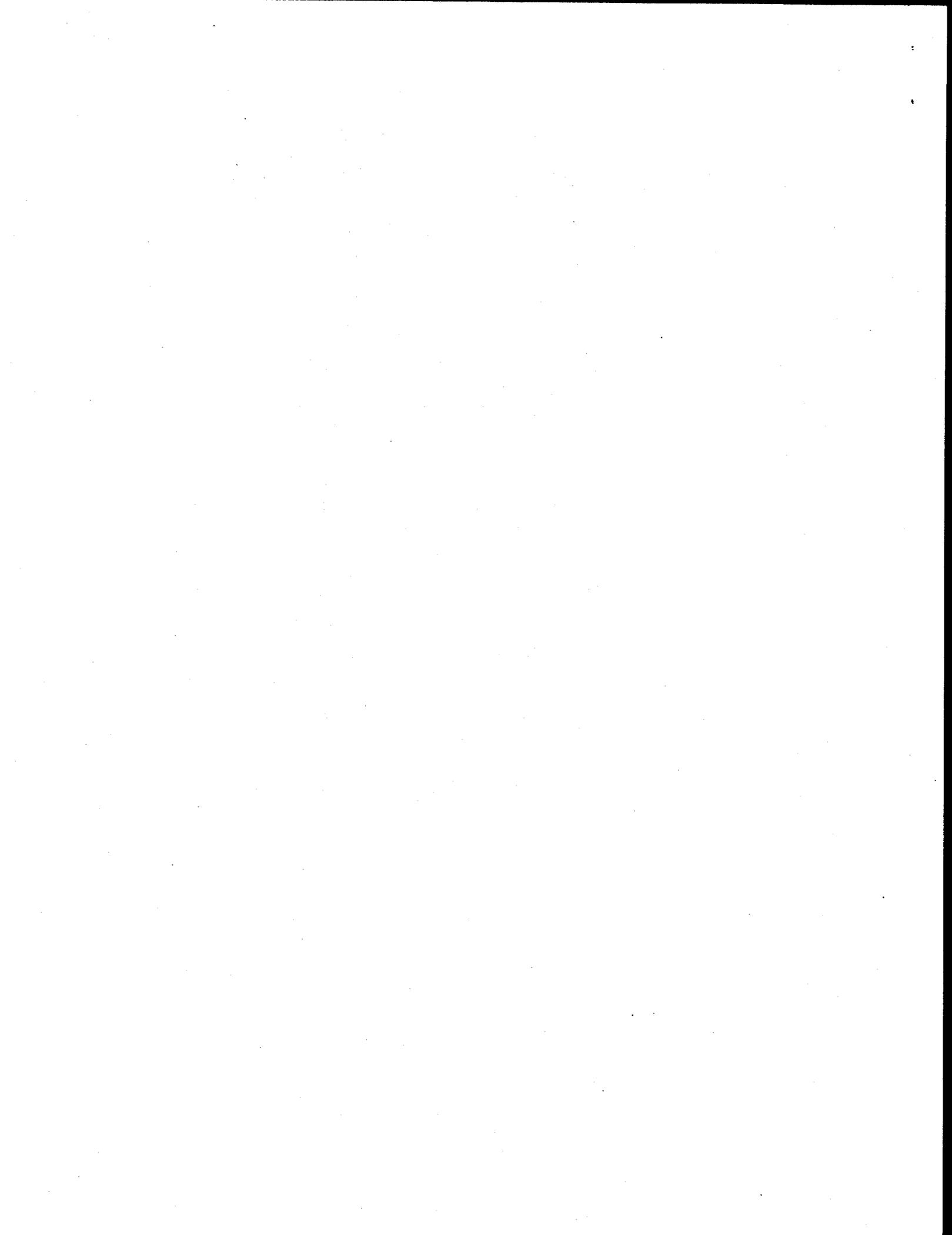
As identified in Section B, above, the Commission finds that the project, as proposed, will impact the sensitive resources adjacent to the project site. As discussed above, the Commission believes that feasible alternative sites exist for the proposed project. Relocating the development to one of these alternative sites (assuming such alternatives would not have greater habitat impacts), would avoid the impacts from this project on the sensitive resources adjacent to the project site.

Alternatively, the project could be brought into conformance with the sensitive habitat resource policies of the CCMP based on several changes. To find the project consistent with the CCMP with respect to sensitive habitat resource policies of the Coastal Act, the Commission needs the following commitments from the Marine Corps:

- commitment to ensure adequate maintenance for the detention basins;
- commitment to provide baseline water quality information and to monitor water quality after construction of the project, ideally at both the San Mateo Creek and the discharge outfalls;
- commitment to monitor vegetation in the adjacent sensitive habitat to assure that landscaping for the project is not introducing exotic species of vegetation to the coastal scrub or wetland area;
- commitment to install shut-off valves or other measure to assure protection of San Mateo Creek in the event of a sewer line break, or rerouting the sewer line to avoid the Creek.

In addition, the Commission needs verification that the detention basins are an adequate size to serve as sediment traps for the proposed project.

With the above commitments and verification regarding the detention basins, the Commission could find the proposed project consistent with Coastal Act water quality and habitat Sections 30231 and 30240. However, such commitments would not enable the Commission to find the project consistent with the CCMP, as it would not resolve in inconsistency discussed above regarding visual and recreation impacts.



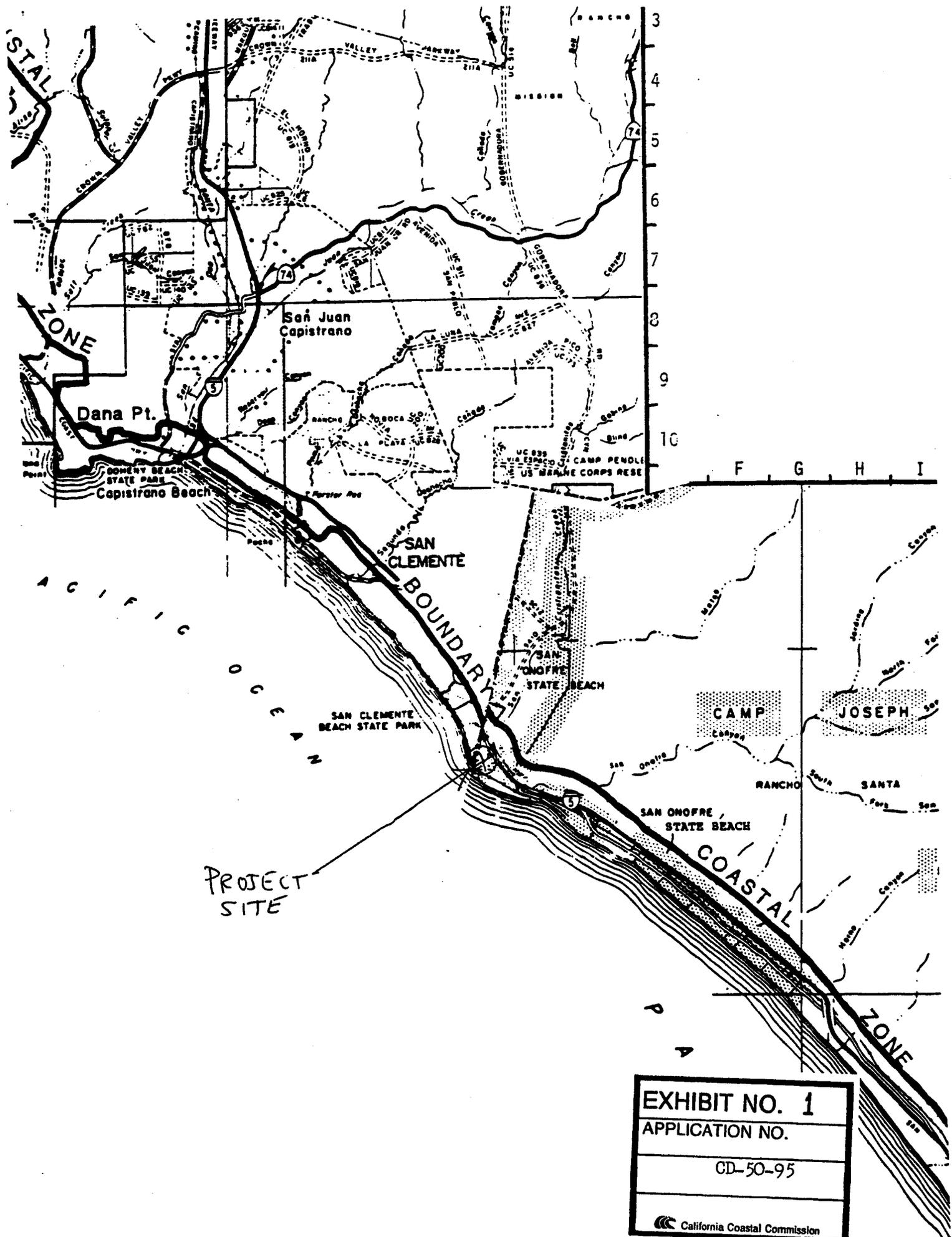


EXHIBIT NO. 1
APPLICATION NO.
CD-50-95
 California Coastal Commission

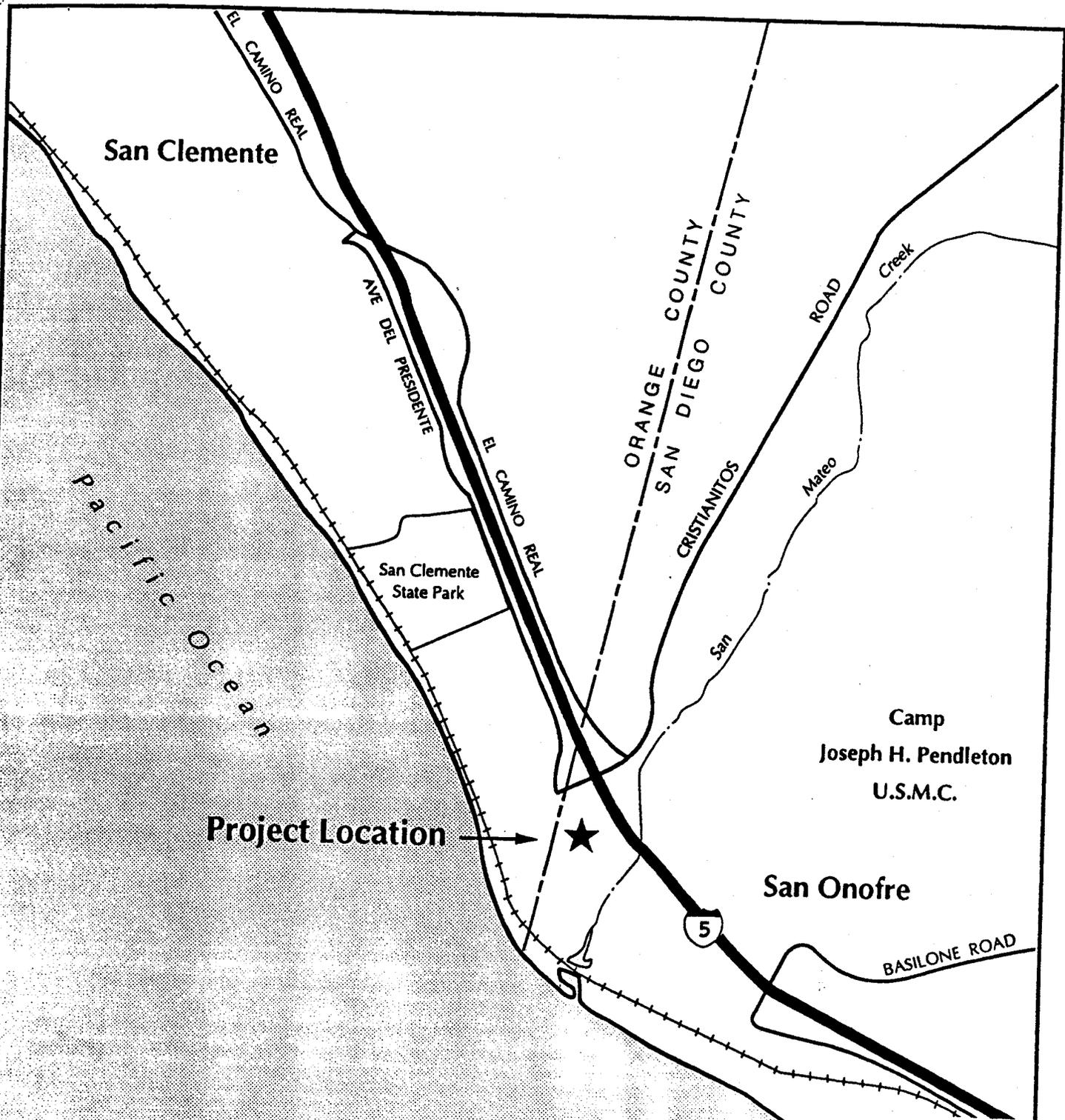
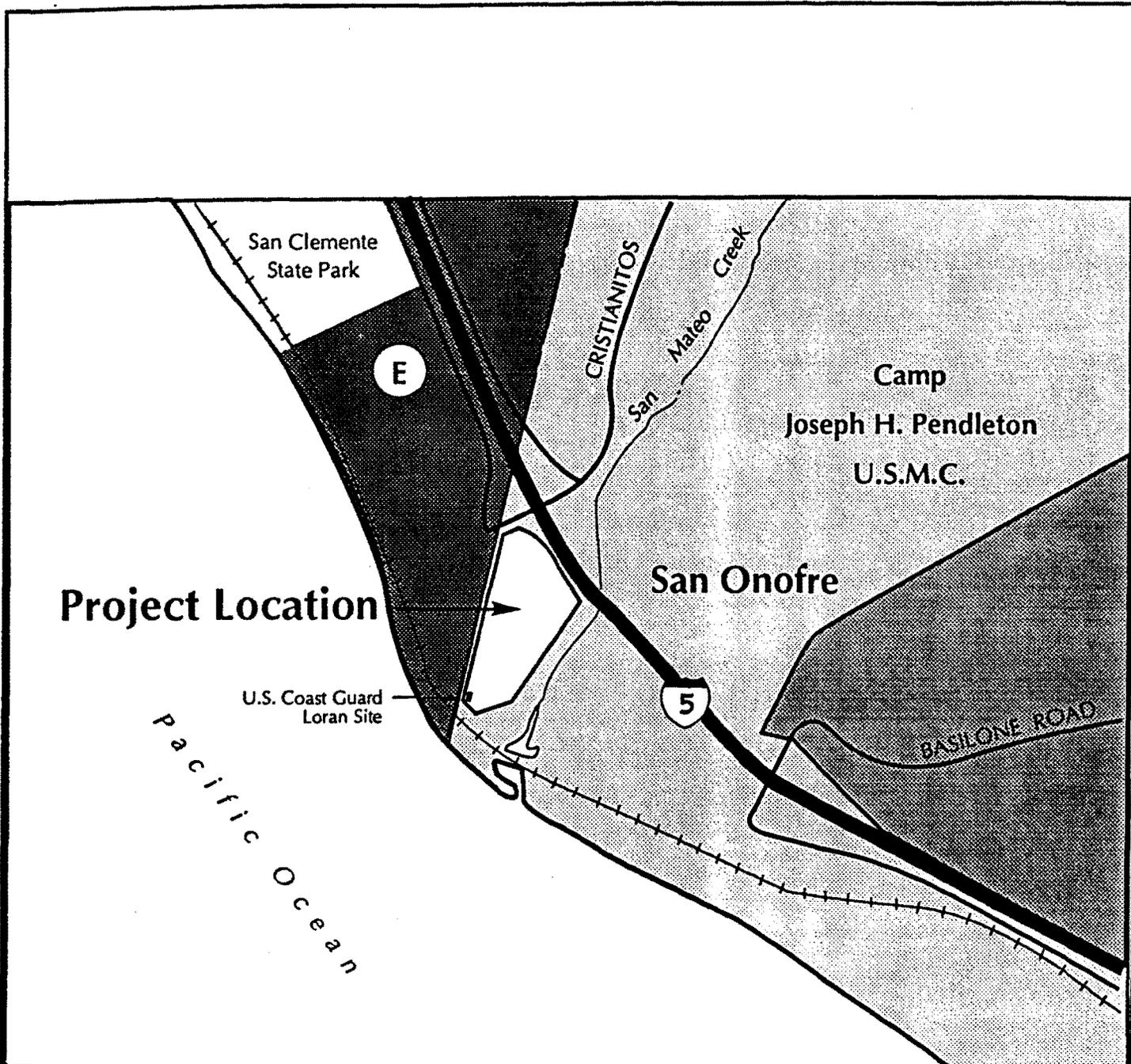


EXHIBIT NO. 2
APPLICATION NO.
CD-50-95
California Coastal Commission

SAN MATEO POINT
MARINE CORPS BASE OFFICER FAMILY HOUSING
Site Vicinity Map





Project Location

-  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-50-95
 California Coastal Commission

**SAN MATEO POINT
MARINE CORPS BASE FAMILY HOUSING
Area Land Use**

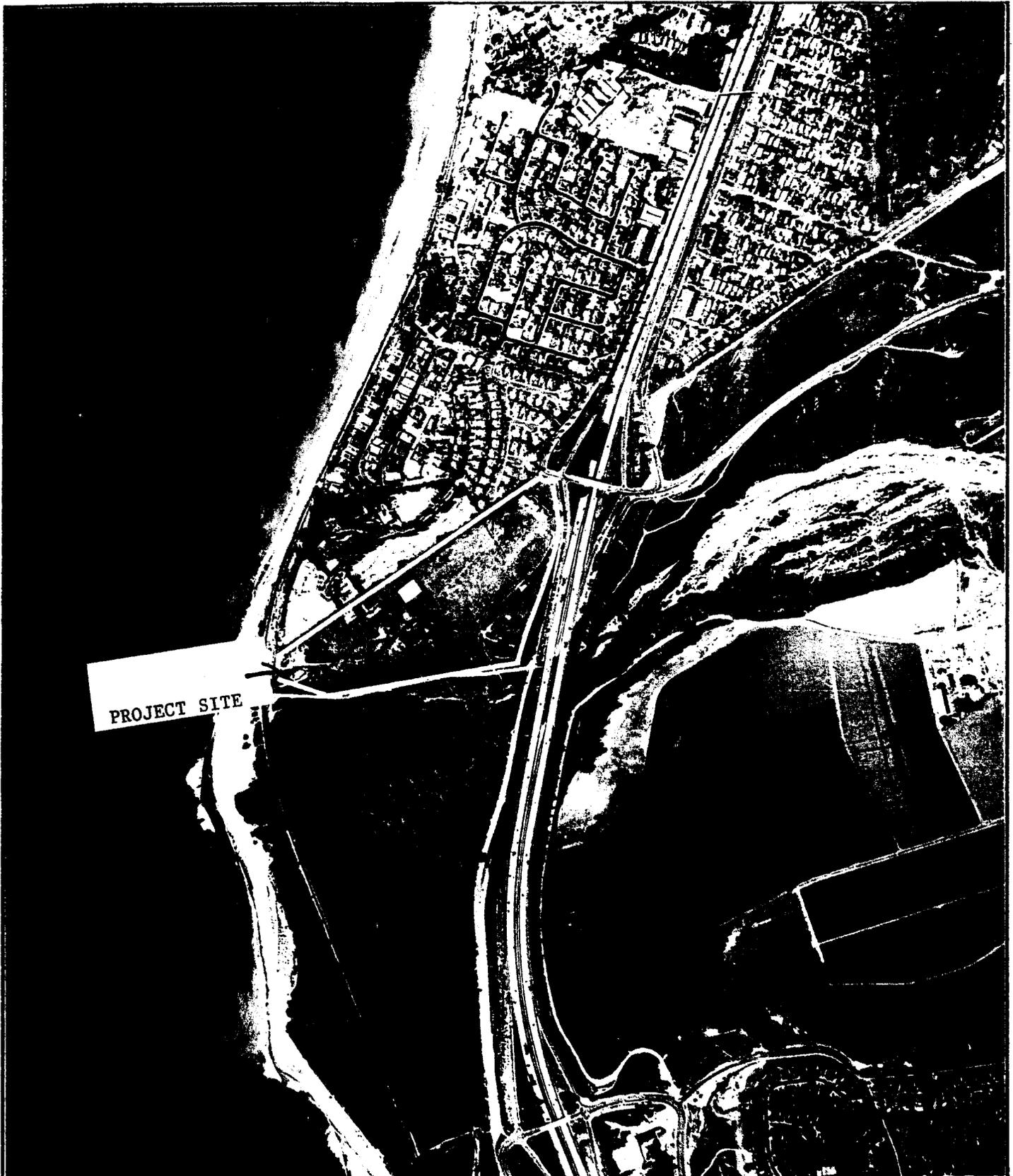
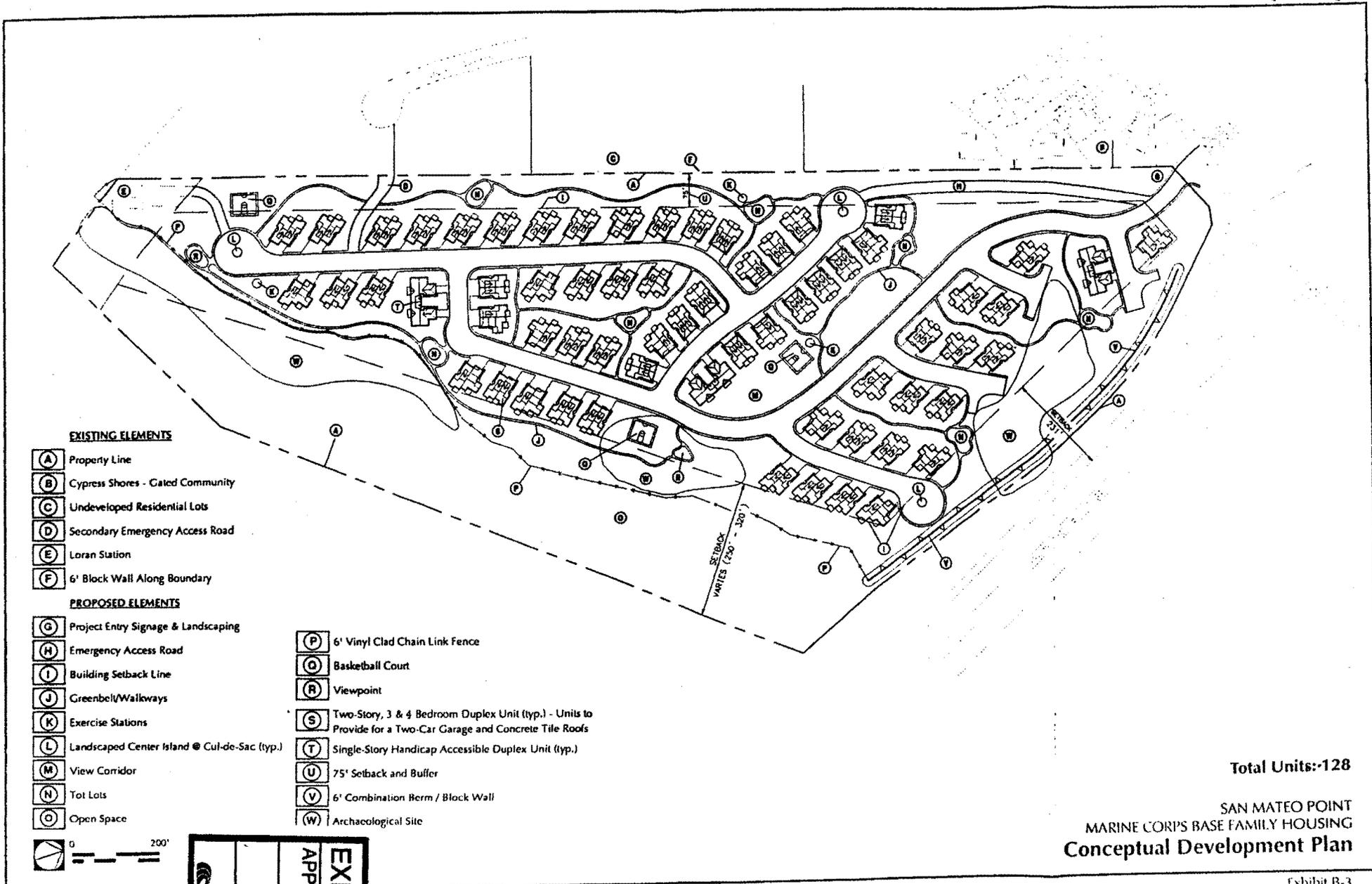


EXHIBIT NO. 4
APPLICATION NO.
CD-50-95
California Coastal Commission

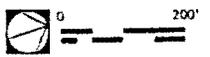
SAN MATEO POINT
MARINE CORPS BASE FAMILY HOUSING
Aerial Photograph



- EXISTING ELEMENTS**
- (A)** Property Line
 - (B)** Cypress Shores - Gated Community
 - (C)** Undeveloped Residential Lots
 - (D)** Secondary Emergency Access Road
 - (E)** Loran Station
 - (F)** 6' Block Wall Along Boundary

- PROPOSED ELEMENTS**
- (G)** Project Entry Signage & Landscaping
 - (H)** Emergency Access Road
 - (I)** Building Setback Line
 - (J)** Greenbelt/Walkways
 - (K)** Exercise Stations
 - (L)** Landscaped Center Island @ Cul-de-Sac (typ.)
 - (M)** View Corridor
 - (N)** Tot Lots
 - (O)** Open Space

- (P)** 6' Vinyl Clad Chain Link Fence
- (Q)** Basketball Court
- (R)** Viewpoint
- (S)** Two-Story, 3 & 4 Bedroom Duplex Unit (typ.) - Units to Provide for a Two-Car Garage and Concrete Tile Roofs
- (T)** Single-Story Handicap Accessible Duplex Unit (typ.)
- (U)** 75' Setback and Buffer
- (V)** 6' Combination Berm / Block Wall
- (W)** Archaeological Site



California Coastal Commission

EXHIBIT NO. 5

APPLICATION NO.

CD-50-95

Total Units: 128

SAN MATEO POINT
MARINE CORPS BASE FAMILY HOUSING
Conceptual Development Plan

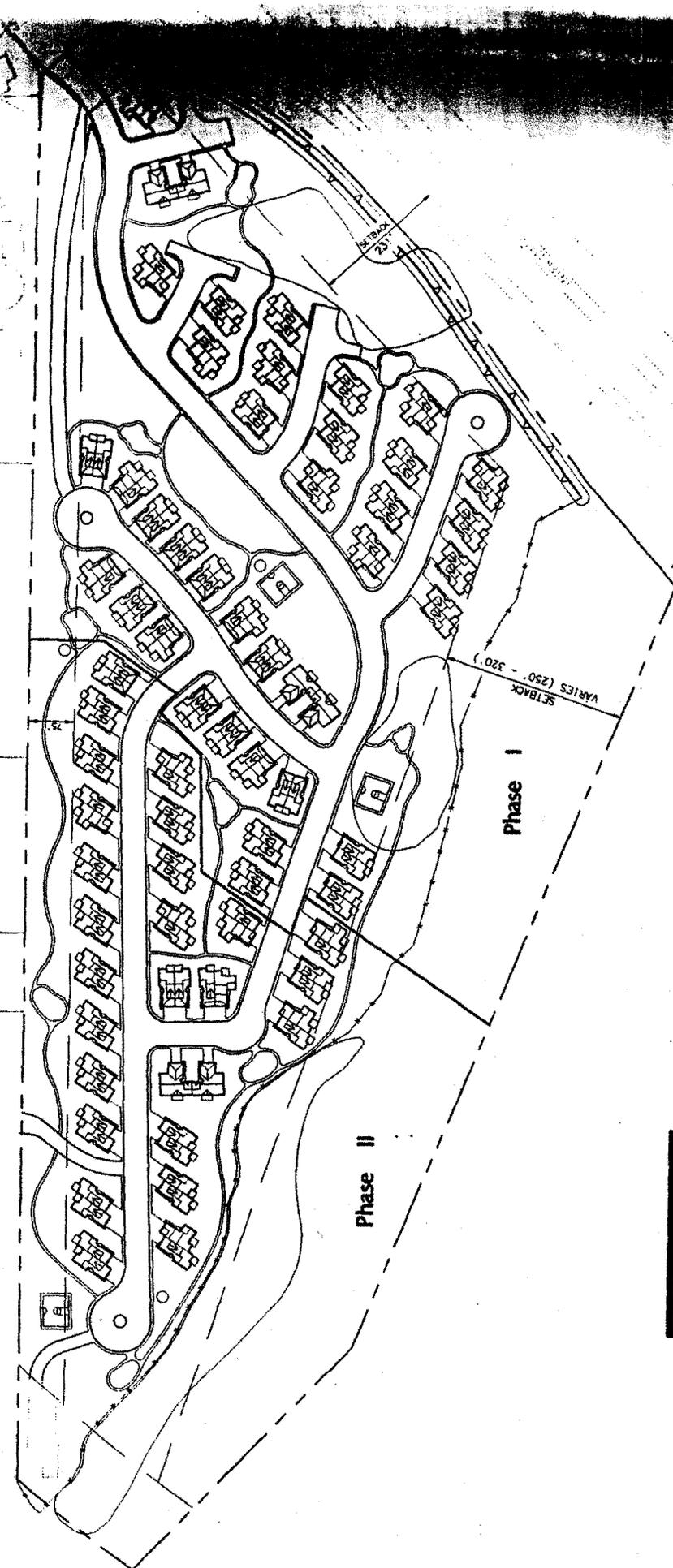
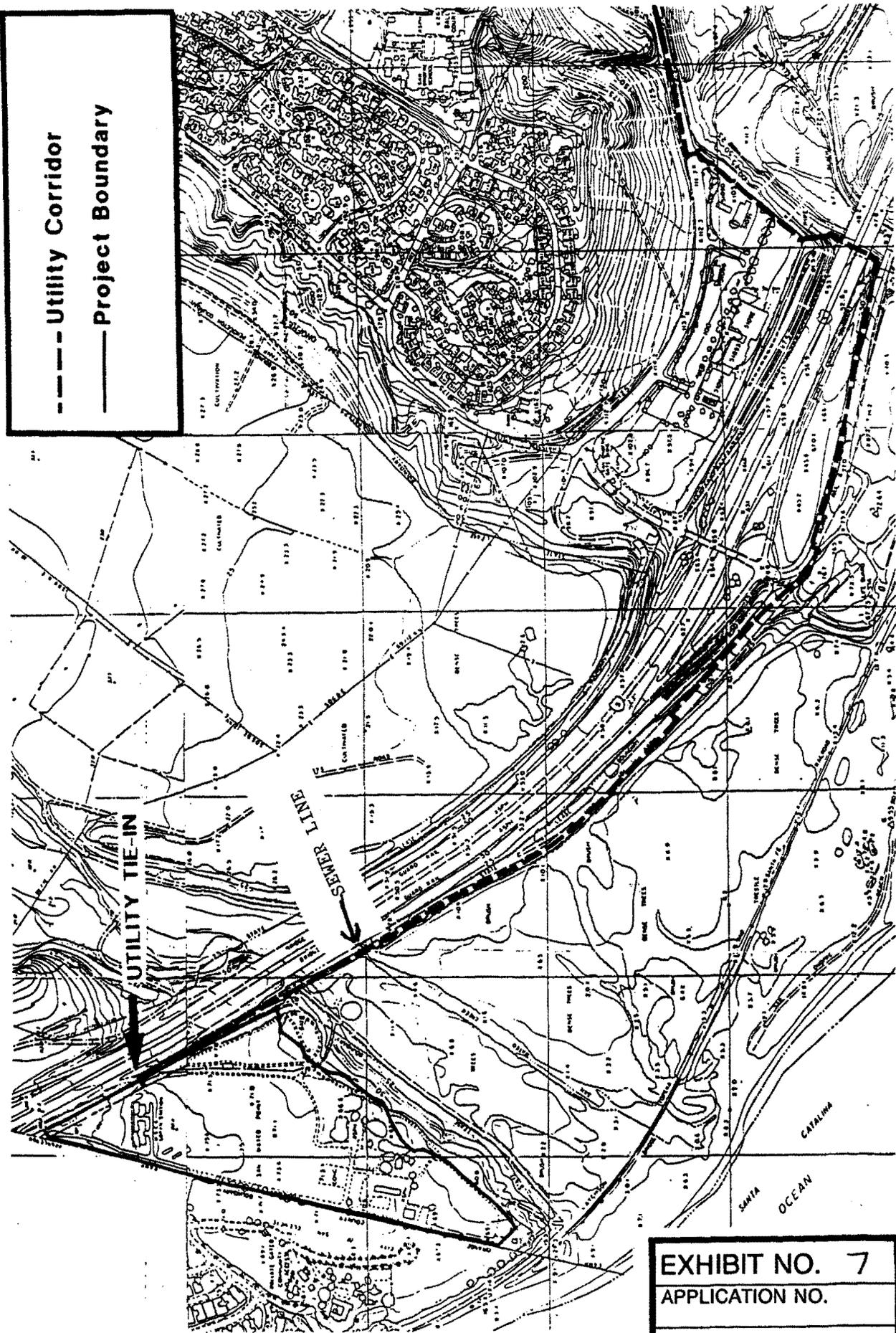


EXHIBIT NO. 6
APPLICATION NO.
CD-50-95
California Coastal Commission

Phase I - 76 Units
 Phase II - 52 Units





- - - - Utility Corridor
 ———— Project Boundary

UTILITY TIE-IN

SEWER LINE

SANTA CATALINA OCEAN

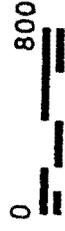
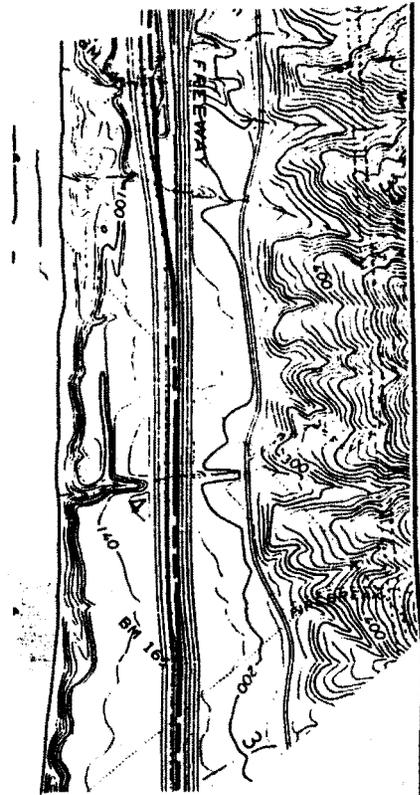


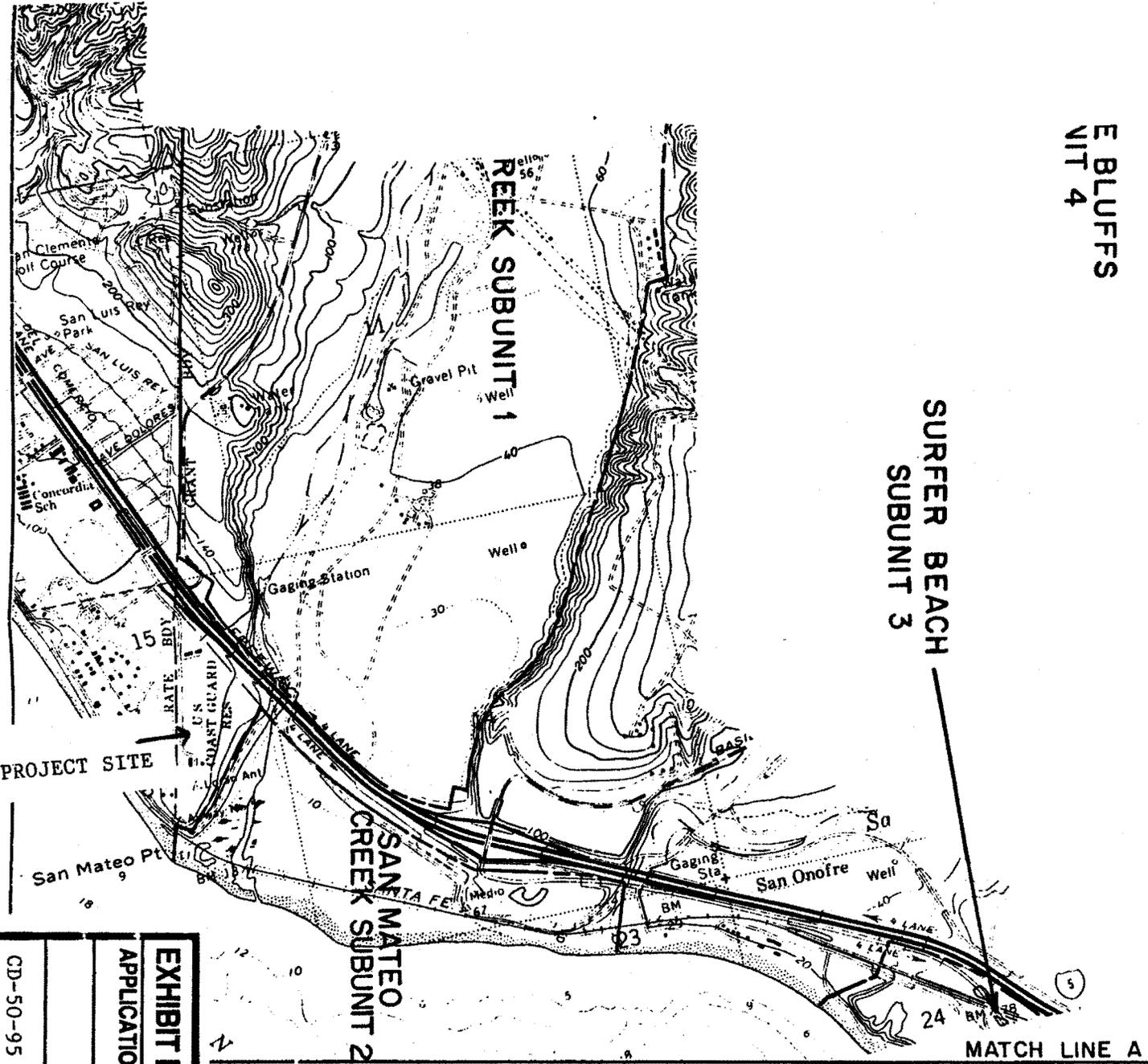
EXHIBIT NO. 7
 APPLICATION NO.
 CD-50-95
 California Coastal Commission

SAN MATEO POINT MARINE CORPS BASE FAMILY HOUSING
 Utility Corridor



E BLUFFS
VIT 4

SURFER BEACH
SUBUNIT 3



CD-50-95

APPLICATION NO.

EXHIBIT NO. 8

SAN ONOFRE STATE BEACH

RESOURCE ELEMENT

SUBUNITS & ELEVATION FEATURES

RESOURCES AGENCY OF CALIFORNIA

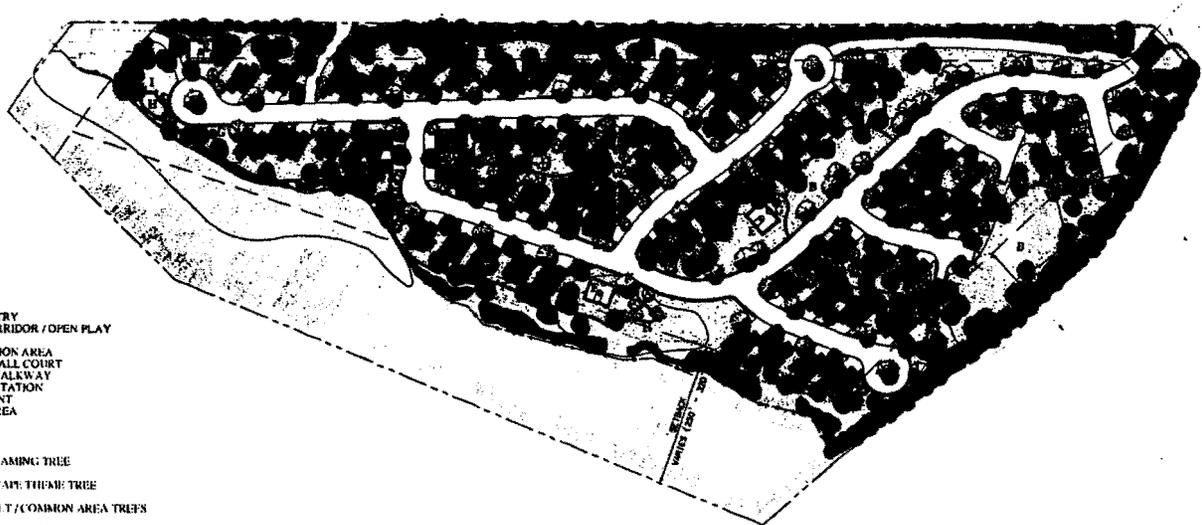
DEPARTMENT OF PARKS AND RECREATION

APPROVED _____ DATE _____

REVI

DRAWN

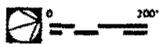
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LEGEND

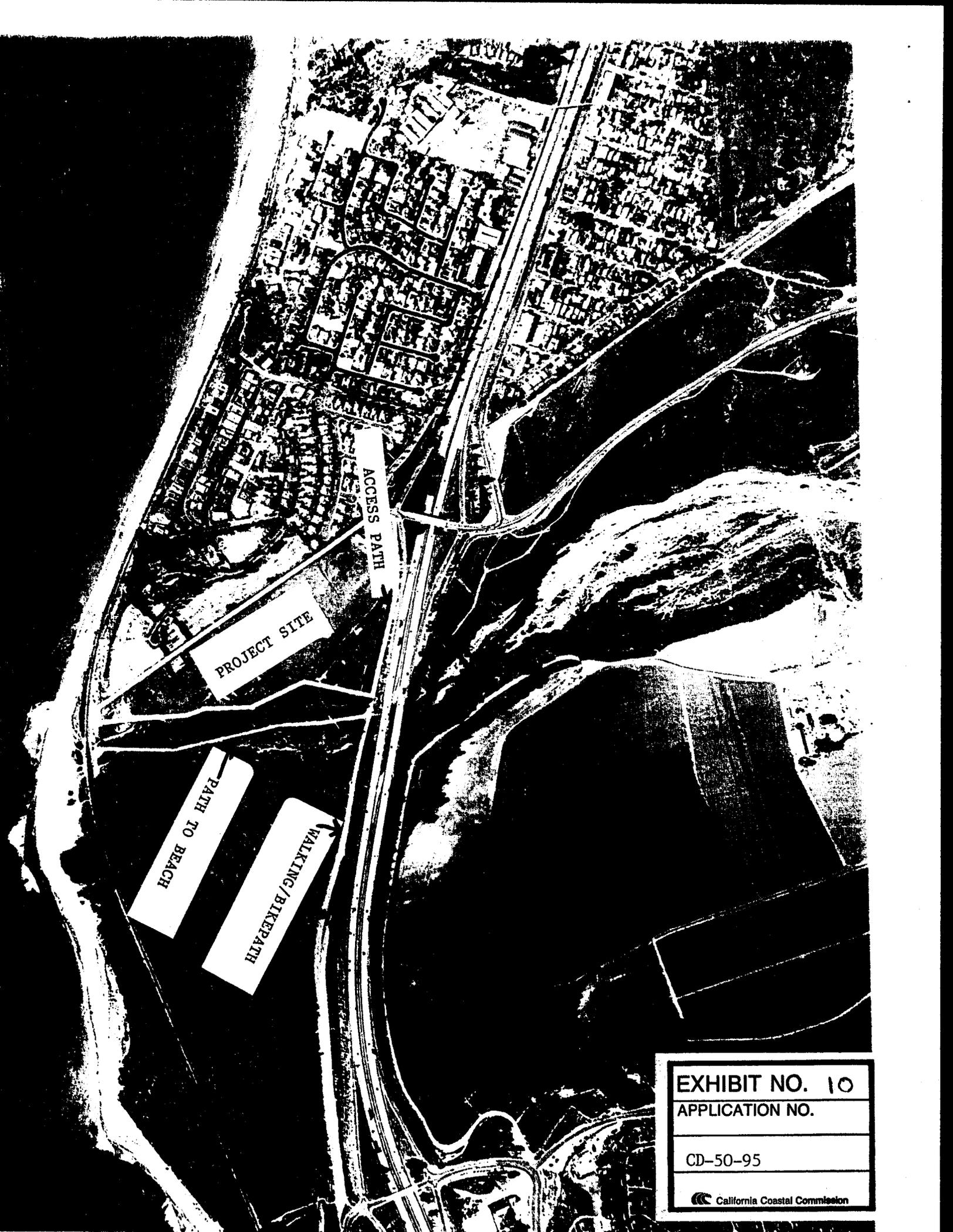
- A. MAIN ENTRY
- B. VIEW CORRIDOR / OPEN PLAY
- C. TUT LOT
- D. RECREATION AREA
- E. BASKETBALL COURT
- F. 4' WIDE WALKWAY
- G. FITNESS STATION
- H. VIEW POINT
- I. PICNIC AREA

- ENTRY FRAMING TREE
- STREET/IN-COURT/THRU TREE
- GREENBELT / COMMON AREA TREES
- MEDIUM ACCENT TREE
- DRIVEWAY BUFFER / SCREENING TREES
- NEIGHBORHOOD BUFFER TREES
- SKYLINE ACCENT TREE
- BUFFER / SCREENING SHRUB MASSING
- NATURALIZED / INFORMAL SHRUB MASSING
- GROUND COVER / UNDERSTORY PLANTING
- PLUMP



SAN MATEO POINT
MARINE CORPS BASE FAMILY HOUSING
Neighborhood Landscape Plan

EXHIBIT NO.	9
APPLICATION NO.	
CD-50-95	



PROJECT SITE

ACCESS PATH

PATH TO BEACH

WALKING/BIKEPATH

EXHIBIT NO. 10
APPLICATION NO.

CD-50-95

California Coastal Commission

CALIFORNIA COASTAL COMMISSION

45 FREMONT SUITE 202G
SAN FRANCISCO, CA 94105 2219
VOICE AND TDD (415) 904-5200

EXHIBIT NO. 11
APPLICATION NO.
CD-50-95

April 30, 1996

U.S. Marine Corps
W.A. Spencer, Colonel
c/o Commanding General (ATTN: CPLO)
Box 555010
Marine Corps Base
Camp Pendleton, CA 92055-5010

Dear Colonel Spencer:

Thank you for the opportunity to review the draft Environmental Assessment (EA) for the San Mateo Point family housing project. The following are our comments and additional information requests. A page number referencing the Environmental Assessment precedes each comment. Additional general comments follow.

1. Pg. 2-5 references a 1986 base-wide review of potential housing sites. The Commission would appreciate receiving a copy of this review, or a more recent version, if it has been updated since 1986.
2. Pg. 2-6 indicates that only Phase 1 of the project is currently funded (76 units). When is Phase 2 of the project anticipated to be funded and occur? It is our understanding that Phase 1 of the proposed project will commence regardless of whether funding is assured for Phase 2. Therefore, if Phase 1 is a "stand-alone" project and/or if Phase 2 is somewhat speculative, what other areas of the base, particularly areas contiguous with existing development or with infill potential, could accommodate these 76 units (such as those areas identified in comment #39)? All possible sites that could accommodate 76 units should be identified, with an assessment of impacts at each feasible site.
3. Pg. 2-6 (and throughout the draft EA) indicates the project will include a setback "from the natural vegetation, varying in width between 20 and 100 feet." Is this setback measured from the vegetation on the bluff? Exhibit 3 (pg. 2-7) indicates a setback from the bluff edge along the southern/southeastern edge of the property of 250-320 feet, and a setback from the northern edge of the property of 231 feet. Exhibit 3 also shows a number of roads and walkways encroaching into the setbacks. Please clarify the distance of the setback, whether it includes or excludes roads and walkways, and from what vegetation or location the setback is measured. If any structures are to be located within the setback, the proposed development should be designed to remove any structures from the setback. Further, pg. 20 of Appendix E notes the possible need for brush clearance. What vegetation will be affected and how close to the blufftop will this brush clearance come? See also comment #36.
4. Pg. 2-9 states that the pipeline for sewer services "will traverse the bridge structure to avoid impacts on the San Mateo Creek below." What measures will be taken to ensure that the

pipe will not break, and in the event that it does, how will the creek be protected from sewage spills?

The EA states that the utility line will remain within the hard-surface area of old Highway 101 west of Interstate 5. This area includes the existing bikepath/access route to the beach. What measures will be taken to ensure access to the beach and along the bikepath is not disrupted during construction of the utility line?

Will the utility line be buried or lie on top of the roadway? See also comment #22.

5. Pg. 2-11 notes that "a large number of Marine Corps personnel are assigned to commands located within the northern portion of the base but live in base family housing areas in the southern portion of the base or in off-base communities, south of MCB Camp Pendleton," resulting "in relatively lengthy commute distances." However, the *Final Environmental Assessment for FY 1990 Family Housing Marine Corps Base Camp Pendleton (September 1990)* states that while the San Mateo site is the preferred site for housing, "development of any one of the three alternative sites would serve to reduce the current demand for company grade officer housing *while maintaining an acceptable commute distance.*" (Pg. 1-3 and 1-4, emphasis added.) The alternative sites were the O'Neill site and Del Mar in the South Base area. Why was a south-base to north-base commute acceptable in 1990 but unacceptable in 1996? What is the average commute distance for Marine Corps personnel on and off base? Where will residents of the proposed project be commuting to? What, if any, is the existing vacancy rate for non-officer housing on base?
6. Pg. 3-5/3-6. The Commission staff agrees with the statement noting the value of this site for agricultural use. Due to the high priority of protecting agriculture under the Coastal Act, this site should be rejected as an alternative to the proposed housing project *only* because of the value of this site for on-going agriculture. If the Marine Corps is certain that agriculture is not feasible to continue at this site after the current lease expires, this site should be reconsidered as an alternative to the proposed project location.
7. Pg. 3-7. The Commission staff requests a map showing the location of the preferred route alignment for the planned Foothills Transportation Corridor within the State Park leased land and an explanation of why the entire area of leased land should be excluded from consideration as an alternative site to the proposed project. Will the proposed transportation corridor encompass the entire leased area? Discussions between Commission staff and the Department of State Parks indicates that the Department feels land is available to accommodate the proposed housing in the lease area, away from the corridor and without sensitive species.

How close would the proposed transportation corridor be to housing units in this area? How much further will the housing at San Mateo Point be from the proposed alignment of the corridor? (Pg. 4.4-3 states that one proposed alignment of the corridor will join I-5 in the vicinity of the proposed site.) What will be the impact of traffic noise on housing units in this alternative area, compared to the noise from the existing freeway and proposed corridor at San Mateo Point? To what degree could such noise impacts be reduced, if necessary, with mitigation measures?

8. Pg. 3-8/3-9, San Onofre Alternative. The 1990 Draft Master Plan for Camp Pendleton indicates two areas at San Onofre suitable for development. Do the 12 acres referenced in the EA for the proposed project include both these areas?
9. Pgs. 4.1-4 to 4.1-8, Geology. There is insufficient information to determine impacts due to erosion from grading. What measures will be included in the Erosion Control Plan to ensure erosion from construction does not occur, particularly into the wetlands reserve area? We request that the Marine Corps agree to submit the Erosion Control Plan for our review, prior to project implementation, as part of the Marine Corps' consistency determination.

What is the timing of the grading for the project? Will the Marine Corps agree to avoid grading during the rainy season?

Will the entire area for Phase 1 be graded or will the site be prepared incrementally? If the entire area for Phase 1 is graded and exposed, what measures will be taken to ensure that erosion will not occur? Will existing structures in the area for Phase 2 be removed with this phase of the project or be left to Phase 2? Will the Phase 2 area be landscaped as part of the Phase 1 project?

10. Section 4.2, Hydrology. There is insufficient information to assess impacts from runoff and the potential for accelerated erosion down the bluff. The EA states that the proposed drain improvements to accommodate runoff from the site include discharge into San Mateo Creek. The increase in impervious surfaces will increase the level of pollutants washed into the creek from rainfall. What are the impacts to the creek from the discharge? What measures will be taken to ensure discharges to the creek will not degrade habitat or water quality? What measures will be taken to ensure that runoff into the creek will not modify hydrology?
11. Pg. 4.2-6 discusses possible BMPs to prevent degradation to water quality. What BMPs will be implemented? How will the Marine Corps implement sufficient controls and monitor the site, post-construction, to ensure that there will be no net increase in runoff or sedimentation that may erode the bluff or cause impacts on riparian habitat or San Mateo Creek. Compliance with the SWPPP and the NPDES permit may not fully protect these resources. Has the Marine Corps collected, or does it intend to collect, baseline information determining pre-project rates of runoff and sedimentation prior to construction? Will pre-project monitoring be performed? We request that the Marine Corps agree to submit a water quality protection and monitoring plan for our review, prior to project implementation, as part of the Marine Corps' consistency determination. Similar information would be required for the San Onofre alternative.

For proposed BMP #2: What types of vegetation will be used to minimize the need for fertilizers and pesticides? How will the vegetation types be maintained? Vegetation on site should be native, drought resistant species compatible with the scrub vegetation adjacent to the site. The use of natives will also reduce introduction of exotic species into the adjacent wetland. See also comment #36.

12. Pg. 4.3-2/4.3-6. Regarding the possibility of underground storage tanks discovered on site, the Commission staff wishes to advise the Marine Corps that the CZMA's federal

consistency provisions are among the "applicable regulations" that will need to be complied with if removal/remediation is necessary.

13. Pg. 4.4-8. What is the height and square footage of the units for the proposed project? How do these compare with other Marine Corps family housing at Camp Pendleton?
14. Pg. 4.4-11. Add visual policies to the list of relevant Coastal Act policies.
15. Section 4.5 and Pg. 2-12. Given the increased cost of this project as noted in the Conceptual Design Plan and the availability of vacancies in the City of San Clemente, is it reasonable to consider partially subsidizing military personnel use of off-base housing in San Clemente as an alternative to development of on-base housing? If not, why not?
16. Pg. 4.8-8/4.8-9 states the project is "not expected to result in significant visual impacts to San Onofre Beach State Park, contiguous beach areas, or to motorists on Interstate 5 or other public roadways." How will the project affect views from south of the site along the beach and bikepath, looking towards the project site? (See attached map with view areas noted.) Photographs with the views of the site from these areas and from Interstate 5 (traveling both north and south), with renderings of housing on the site would be helpful. Will planned vegetation within the setback completely screen houses along the initial stretch of the beach pathway/bikepath paralleling Interstate 5? How long will it take for the vegetation to grow to the height necessary to succeed in this screening?

Will lighting from the project site be visible from beach areas at night during open hours (i.e. before 10 p.m.)?
17. Pg. 4.8-12 discusses impacts on views for current residents between the proposed alternative and the Cotton Point Alternative. How do the views from *public* locations compare for these two alternatives? From the path to the beach? From the bikepath down coast of the site? From beach areas down coast of the site? (See attached map with view areas noted.)
18. Section 4.9 and Appendix E. Given the proximity of several federally listed species to the project site and the possible indirect impacts to those species, the Commission staff is concerned that no consultation with the U.S. Fish and Wildlife Service has occurred. We are also concerned with the timing and number of the surveys performed for the biological assessment. Is the survey performed in September adequate to account for seasonal species that may utilize the site and adjacent areas at other times of the year?

We are also concerned with the possibility of the Pacific pocket mouse occurring on the site itself. The biological reports notes that given the difficulty in trapping the species, habitat adjacent to the site, and the presence of the species approximately one-half mile from the site, in contiguous habitat, "there is some possibility that the Pacific pocket mouse could utilize [the proposed] project site." Is one trapping session adequate to ensure whether the Pacific pocket mouse is present on the site? Why did the trapping not cover the adjacent habitat slope?

Given the number of listed species in close proximity to the site and the potential for indirect impacts to those species, the Commission staff believes that some level of consultation with the U.S. Fish and Wildlife Service is warranted. If the Marine Corps feels that such

consultation is not warranted, the Commission staff requests verification from the U.S. Fish and Wildlife Service indicating that consultation is not necessary for this project.

19. Pg. 4.9-3. The Commission staff requests the results of the Army Corps of Engineers' final spring survey regarding the sensitive species/vernal pools at the proposed project site.
20. Pg. 4.9-4. Will any vegetation need to be removed for placement of the utility corridor? If so, what vegetation and where? Will the areas be restored? See also comment #22.
21. Pg. 4.9-9/4.9-10 regarding buffer width, see comment #3.

Regarding water quality/runoff, see comment #10.

22. Pgs. 4.9-8 to 4.9-12. Regarding mitigation for potential impacts from construction of the utility corridor, please clarify how mitigation measure number 9.6 will be carried out and enforced. Will sensitive areas be fenced or flagged to ensure no encroachment occurs? Where will the construction staging areas be located? What measures will be taken to ensure that materials stockpiled will not slip or be washed down the slopes into the riparian and creek areas? What measures will be taken to ensure that no runoff into the creek will occur during grading for the corridor (pg. 4.12-10)? What are the construction mitigation measures referred to on pg. 4.9-10 that will be used to avoid indirect impacts from the construction of the corridor?

In addition, Appendix E notes two areas with relatively steep slopes (near Basilone Road off ramp and near the proposed housing site) where it would be best to have the utility lines in the road. Please clarify whether the utility corridor will be in the road in these places.

23. Pg. 4.9-10 and Appendix E, pg. 23. Clarify setback. See comment #3. With regards to lighting and noise, we reiterate our request for consultation with the U.S. Fish and Wildlife Service to ensure construction activities for the utility corridor do not negatively affect the least Bell's vireo and the California gnatcatcher. Can construction occur when the least Bell's vireo and California gnatcatcher are not present adjacent to the site? Are these the only two listed species potentially affected by construction noise?
24. Pg. 4.9-12. How will the no cat policy be enforced? What are the likely impacts to the coastal scrub and riparian areas from other domestic animals? What measures will be taken to reduce any impacts?
25. Pg. 4.9-12. The Commission staff is concerned about habitat impacts from informal access down the bluffs and through sensitive habitat, especially given the existing road at the southern end of the site. Regarding mitigation number 9.4, how will the fence be designed to prohibit access to the bluff and riparian areas (i.e., will it have any gates accessing the bluff area)?
26. Pg. 4.10-7. Although the draft EA states that archaeological resources are not anticipated in the utility corridor, what measures will be taken if they are found during grading/pipeline installation? Will the Marine Corps agree to stop work and notify the State Historic Preservation Office in the event archeological resources are found?

27. Pg. 4.12-9 states that "residents of the proposed housing will be relocated from existing military housing located within the SDAB [San Diego Air Basin]." Is this from on-base housing from the South Base? From the North Base?
28. Pg. 4.12-16. Regarding mitigation measure 12-1, within what time period will disturbed areas be revegetated in order to reduce erosion? How will revegetation efforts be monitored and, if necessary, remediated?
29. Pg. 4.13-9. How will the barrier wall for housing affect public views across the site towards the ocean from Interstate 5 (considering both north-bound and south-bound travelers' views)?
30. Pg. 4.14-2/4.14-3. The Draft EA notes that the water supplied for this project will most likely be from Camp Pendleton's San Mateo basin aquifer. Will there be any impacts on recharge to the aquifer/underground water flows? What is the rate of recharge versus the rate of withdrawal? What will the impacts be from water withdrawal of the San Mateo basin aquifer on the downcoast San Mateo Creek and sensitive species? Please discuss any impacts on habitat from water withdrawal based on the agreement allowing the water district to produce excess water from the aquifer. What constitutes "excess" water?

In the event water is obtained from the Metropolitan Water District, is there sufficient availability of water to serve the site?

What measures are being taken for water conservation, both for residences and irrigation purposes?

31. Section 5, Cumulative Impacts. While the Draft EA acknowledges that this project will not fully resolve the housing shortage on base, the cumulative impacts discussion does not identify other likely housing needs and locations. What are the reasonably foreseeable housing proposals for the base? We recommend that the Marine Corps address its housing needs in a more comprehensive manner such as through a base-wide housing plan, within which individual projects could be placed in an overall context.
32. Pg. 5-3 states that future development will increase the impervious surface, thereby reducing groundwater recharge. Will this project contribute to this reduction? If so, what will its impacts be and how will they be mitigated?
33. Pg. 5-4 notes the cumulative loss of open space is best mitigated through regional programs like the Camp Pendleton Master Plan which establish guidelines and mitigation. What are these measures?
34. Pg. 5-6 notes that cumulative impacts on biological resources can be reduced by "allowing habitat for various natural species to be partially retained within the project area." Open space on site should be maximized and landscaping should be with native plants. See comments #11 and 36.
35. Pg. 23, Appendix E notes some erosion problems occurring from runoff at the proposed site in addition to some parking lots buckling due to undermining. Please reconcile with the implications in the EA that the project site is stable. What measures will be undertaken to address these problems?

General Comments

36. Exhibit F-11 of the Conceptual Development Plan shows a variety of vegetation in the buffer and up to the bluff edge along the northern length of the property. The discussion of the species to be used does not indicate that all species will be native and compatible with the adjacent habitat of coastal scrub. What is the possibility these species will encroach into and establish in the coastal scrub area or wetland area through seed dispersal, out-competition, etc.? Only native, drought-tolerant species should be used in landscaping.

What is the potential for increased runoff and erosion due to irrigation at the bluff top? (See also comment #10.) What is the likelihood of pesticides and fertilizers being sprayed/washed into the scrub and/or riparian habitat? The *Final Environmental Assessment for FY 1990 Family Housing Marine Corps Base Camp Pendleton (September 1990)* states:

Irrigation and increased human activity associated with development on the site [San Mateo Point] may, however, cause adverse impacts to the coastal bluff sage scrub vegetation community located adjacent to the proposed development area on the south and southeast slopes of the site. Runoff from residential irrigation may increase erosion of the bluffs, provide excess water to sage scrub species with low water tolerance, and permit the establishment of invasive, non-native species in the community. These alterations to the native community and increased human activity in the vicinity would adversely affect sensitive animal species ... which may occur within the coastal bluff sage scrub community. Due to the potential adverse effects on sensitive wildlife species and the sensitivity of the coastal bluff sage scrub community itself, these indirect impacts would be significant. (Pgs. 3-13 and 3-14)

The 1990 EA referenced above recommends that mitigation should include that "Development pads, lawns, and landscape vegetation shall be placed as far away as possible from the coastal bluff sage scrub." (pg. 3-15)

The project should be designed to ensure that no non coastal scrub vegetation or development encroaches into the setback. Landscaping should use native species. The Conceptual Development Plan also does not indicate what, if any, vegetation is on the eastern slope (San Mateo Creek side) in the buffer area. This information should be provided.

37. What is current level of recreational use at Trestles Beach? Is it considered at capacity? How much additional use will be generated from this project during peak recreational periods?
38. Has the Marine Corps considered a shuttle service for residents of the proposed housing site to the base facilities?
39. The 1990 Draft Master Plan for Camp Pendleton identifies other areas suitable for development, and other areas identified for family housing. Please explain the feasibility of each of the following sites for the proposed project. Also, please identify the degree to which the existing housing areas are fully built-out. If other sites are available, they should also be assessed.

Area 24

Area 26

Edson range and the 31A area (Master Plan notes family housing to be constructed here)

Margarita

Las Flores (Master Plan shows proposed housing)

Del Mar

*Pulgas

*Horno (Master Plan shows proposed housing)

*San Mateo

*Chrisitanitos

*Talega

(* indicates site in northern portion of base.)

The Master Plan designated the areas listed below as housing areas. These are in addition to the areas discussed as alternatives for the proposed project and in the 1990 EA for family housing. Are these areas fully build-out or is land available to support Phase i of the proposed project?

Land adjacent to O'Neill to the site to the north, east and south (identified in 1990 EA as possible sites for housing)

Ranch House

De Luz

Area 11

Stuart Mesa area (Master Plan indicates ultimate buildout of 1700 dwelling units)

South Mesa/Wire Mountain

HQ area

Serra Mesa

40. The Conceptual Design Plan indicates that the project will have 40 ft. wide streets to ensure space for parking on both sides. The plan also states:

The site concept includes unit plans that provide two garaged parking spaces with additional driveway guest parking spaces when the garage is 20 feet from curb face. This avoids the necessity of parking in the street, creating a safer and more attractive neighborhood. (Pg. F-5)

Please clarify why 40 ft. wide streets are needed if guest parking is incorporated into at least some, if not many, of the units. Reducing the paved area would increase open space, reduce runoff potential, and could increase the buffers to habitat and views from the beach and bikepath.

Further, the proposed project could only marginally be considered "clustered". Clustering housing reduces impervious surfaces, increases open space and habitat, and may reduce impacts on views from public areas. The Marine Corps should analyze alternative arrangements of more fully clustering the proposed units (for example, clustering in a manner similar to the 150 unit alternative which was rejected).

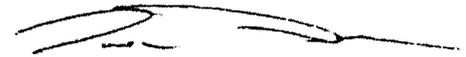
41. Why is the Cotton Point alternative not a feasible, less environmentally damaging alternative, with respect to coastal resources, such as habitat and public views?

Comments on Appendix D Draft Consistency Determination

42. Sections 30230 and 32040: See previous comments regarding potential impacts of runoff and sedimentation into the riparian area and creek.
43. Section 30240: The Draft CD notes "minor alterations to the native vegetation community." What are these alterations? They are not discussed specifically in Draft EA. Has the U.S. Fish and Wildlife Service agreed that these alterations will not affect any listed species?
44. Section 30251: Regarding visual impacts, see previous comments. The Commission staff requests further analysis of impacts on views from downcoast of the site.

We look forwards to your responses. Please feel free to call me if you have any questions at (415) 904-5297.

Sincerely,



Tania Pollak
Federal Consistency Analyst

cc: San Diego Area Office
OCRM

DEPARTMENT OF PARKS AND RECREATION

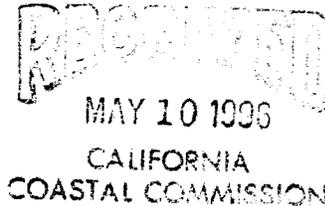
Orange Coast District
 3030 Avenida Del Presidente
 San Clemente, California 92672
 (714) 492-0802, FAX (714) 492-8412

EXHIBIT NO. 12**APPLICATION NO.**

CD-50-95



April 25, 1996



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 Sate 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.

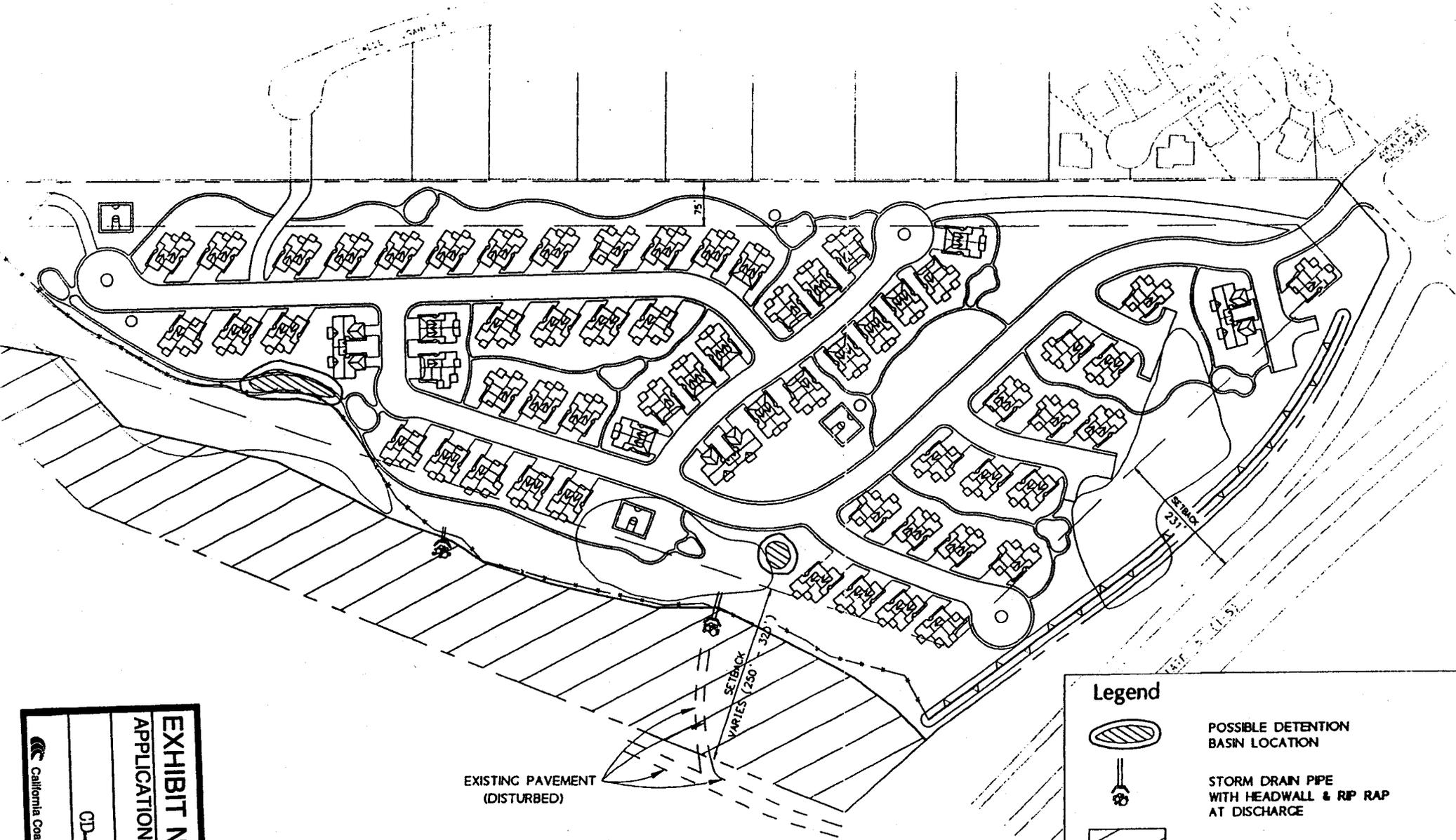
We thank you for the opportunity to provide comments on this project. The local contact person for the Department is Mr. David R. Pryor, Associate Resource Ecologist, Orange Coast District, 18331 Enterprise Ln., Huntington Beach, California 92648, telephone (714) 848-1566.

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

-  POSSIBLE DETENTION BASIN LOCATION
-  STORM DRAIN PIPE WITH HEADWALL & RIP RAP AT DISCHARGE
-  COASTAL SAGE SCRUB

SAN MATEO POINT FAMILY HOUSING
MARINE CORPS BASE CAMP PENDLETON
Drainage Detention / Erosion Exhibit

 California Coastal Commission	EXHIBIT NO. 13
	APPLICATION NO.
	CD-50-95

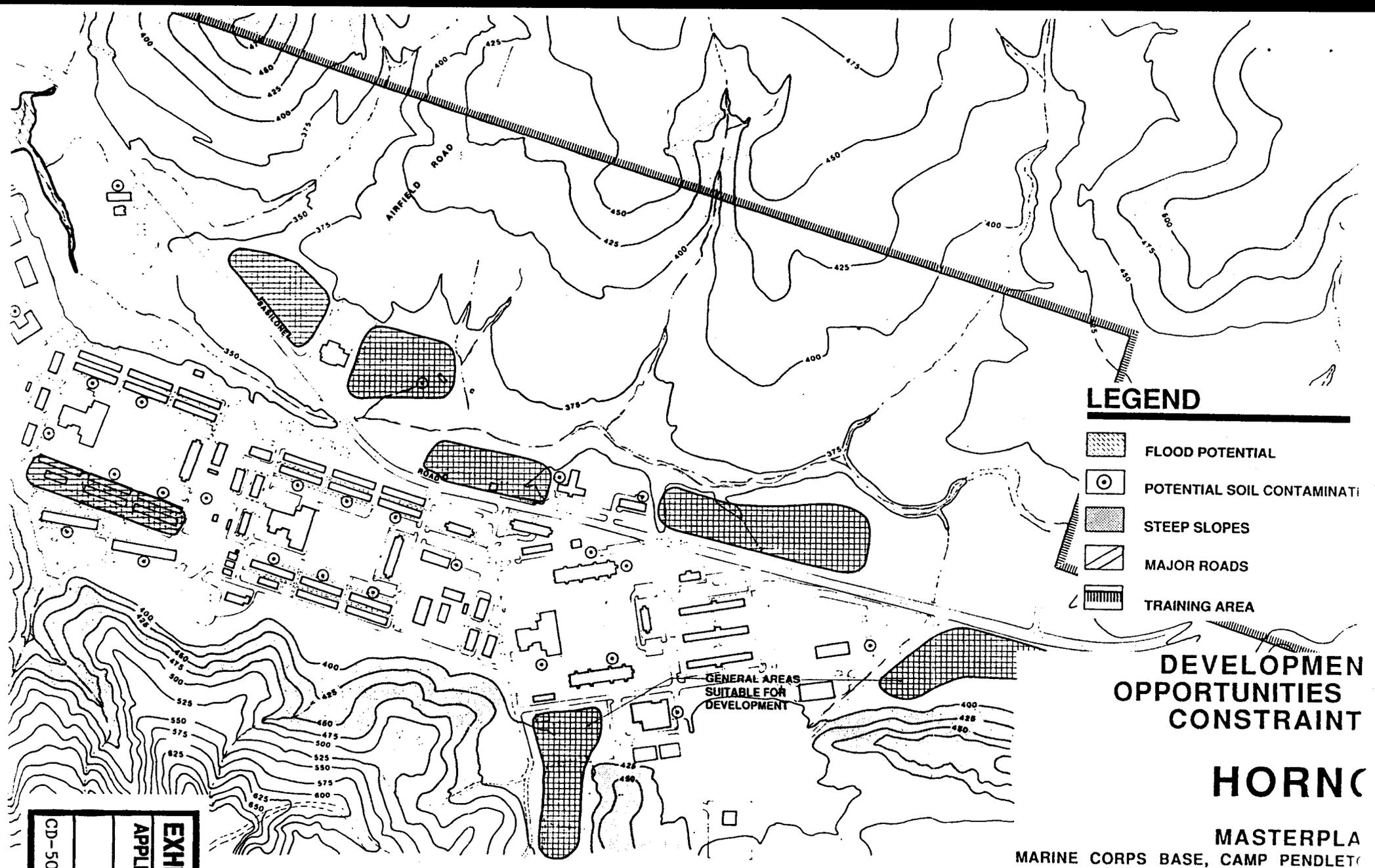


EXHIBIT NO. 14
 APPLICATION NO.
 CD-50-95

LEGEND

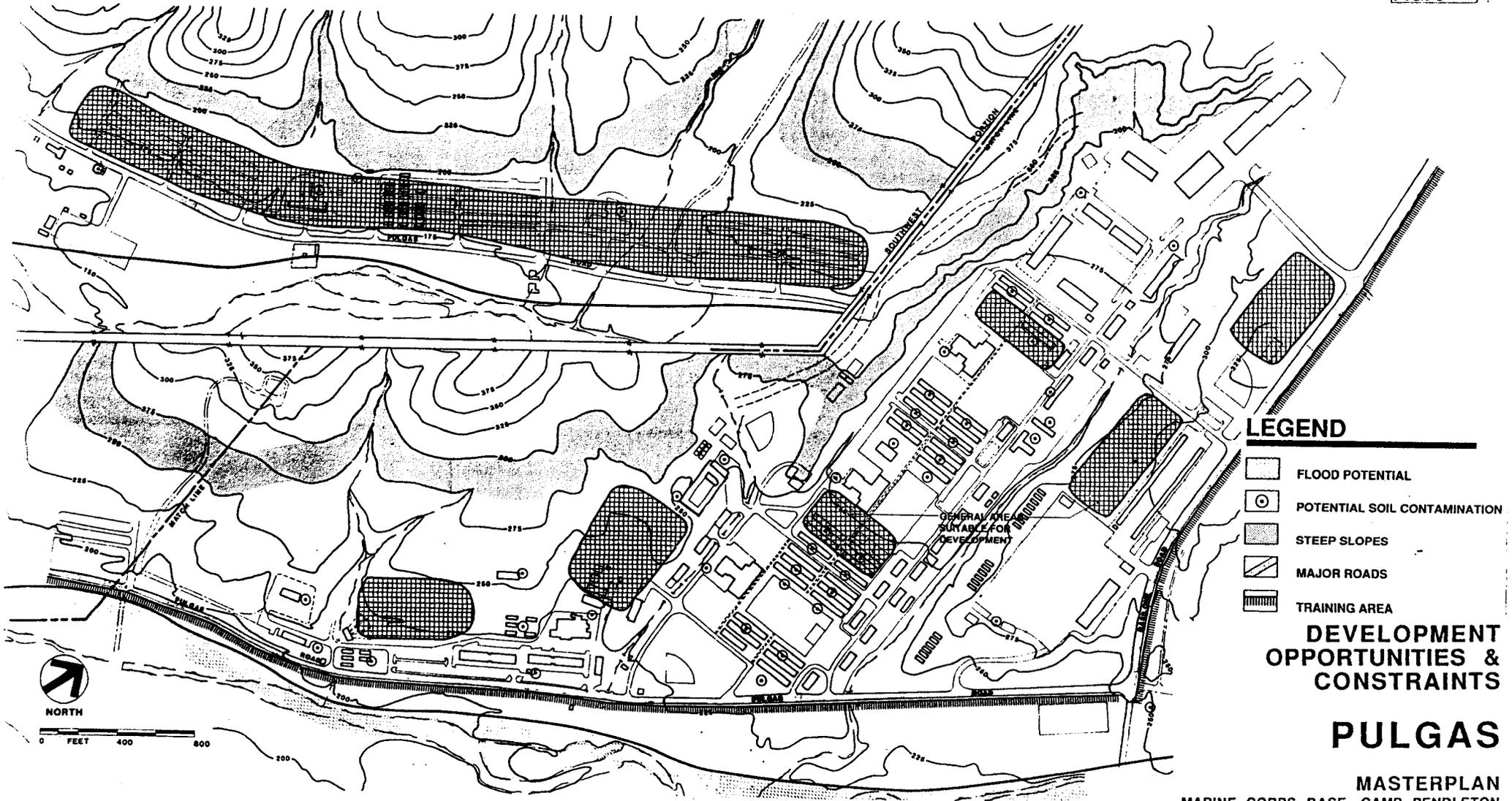
- 1 OPERATIONS AND TRAINING
- 2 MAINTENANCE AND PRODUCTION
- 3 SUPPLY AND STORAGE
- 4 MEDICAL AND DENTAL
- 5 COMMAND/ADMINISTRATION
- 6 HOUSING AND PERSONNEL SUPPORT
- 7 RECREATION AND COMMUNITY
- 8 UTILITIES

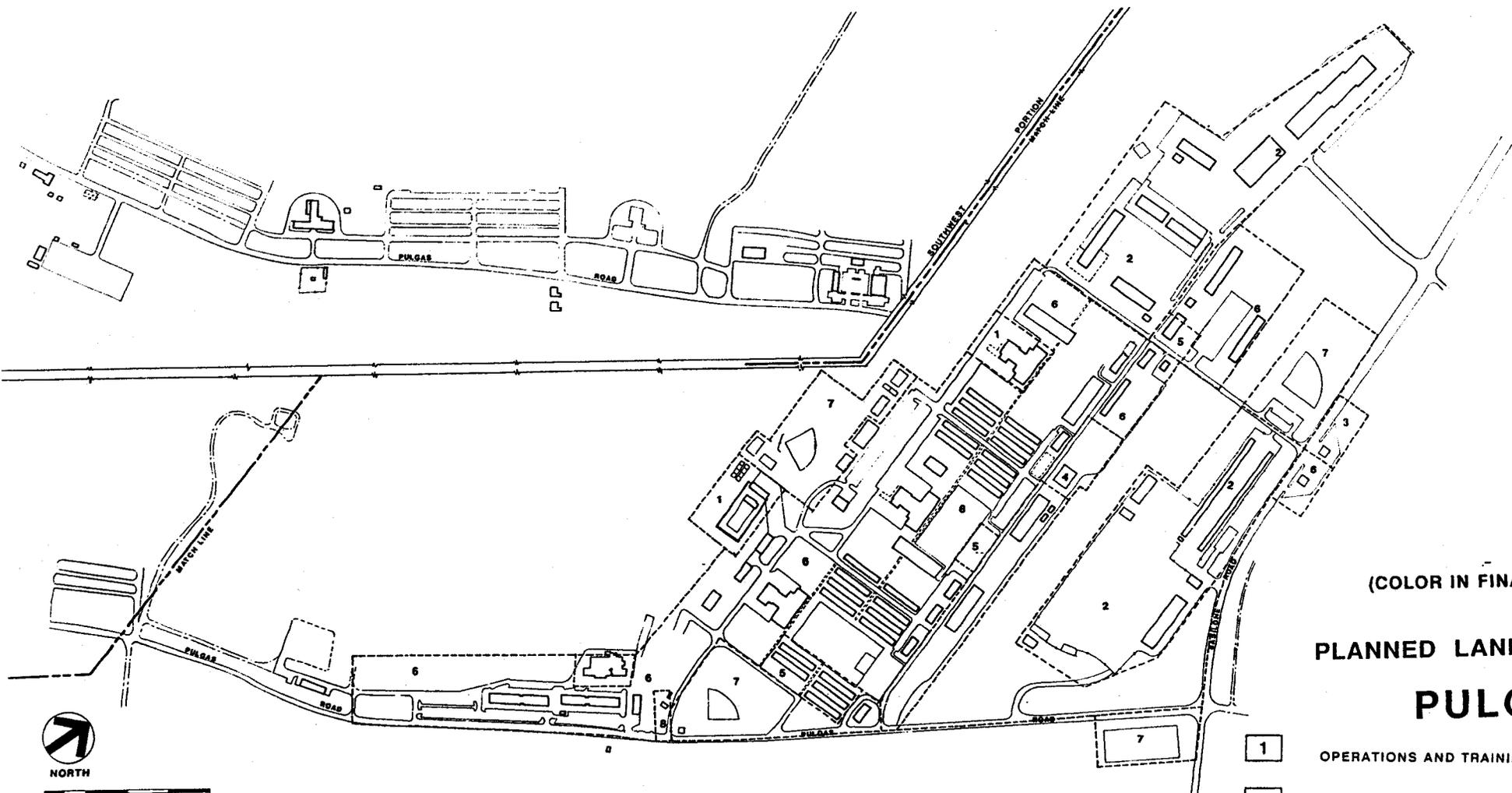


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PLANNED LAND USE

HORNO

MASTERPLAN
MARINE CORPS BASE, CAMP PENDLETON



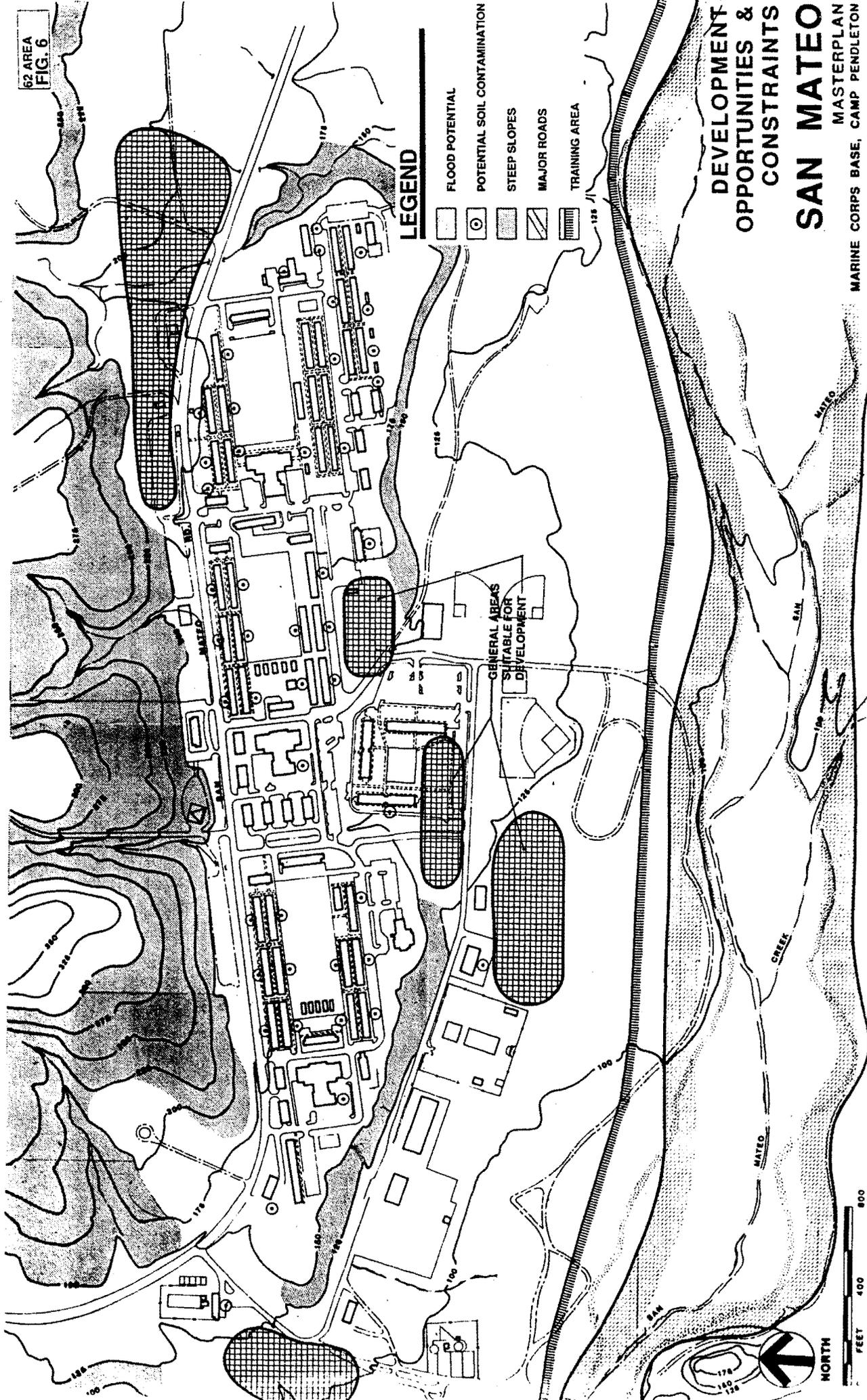


(COLOR IN FINAL)

PLANNED LAND USE PULGAS

- 1 OPERATIONS AND TRAINING
- 2 MAINTENANCE
- 3 SUPPLY AND STORAGE
- 4 MEDICAL AND DENTAL
- 5 COMMAND/ADMINISTRATION
- 6 HOUSING AND PERSONNEL SUPPORT
- 7 RECREATION AND COMMUNITY

62 AREA
FIG. 6



LEGEND

-  FLOOD POTENTIAL
-  POTENTIAL SOIL CONTAMINATION
-  STEEP SLOPES
-  MAJOR ROADS
-  TRAINING AREA

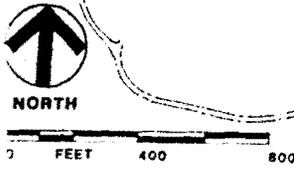
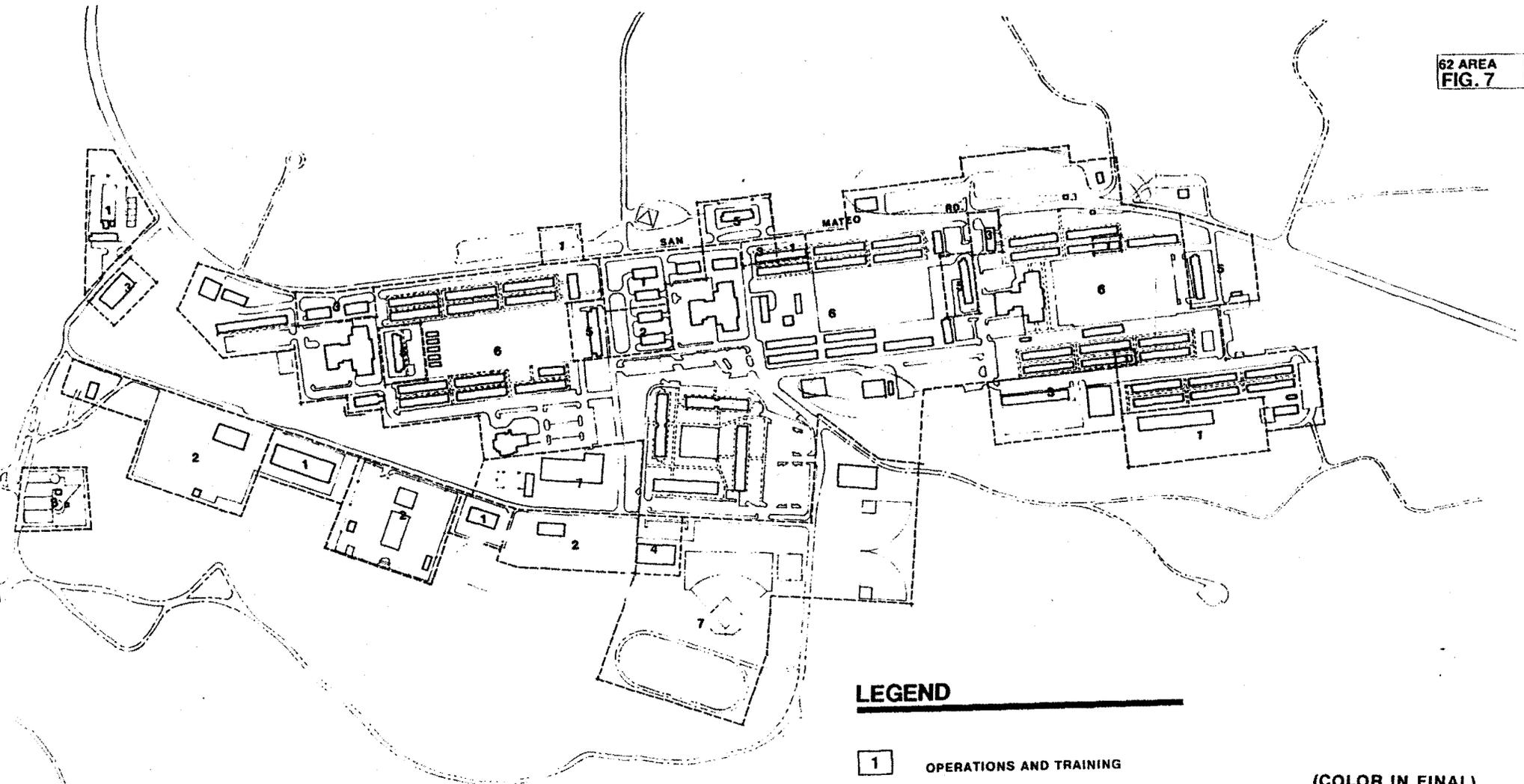
DEVELOPMENT & OPPORTUNITIES & CONSTRAINTS

SAN MATEO

MASTERPLAN
MARINE CORPS BASE, CAMP PENDLETON

GENERAL AREAS
SUITABLE FOR
DEVELOPMENT





LEGEND

- 1 OPERATIONS AND TRAINING
- 2 MAINTENANCE
- 3 SUPPLY AND STORAGE
- 4 MEDICAL AND DENTAL
- 5 COMMAND/ADMINISTRATION
- 6 HOUSING AND PERSONNEL SUPPORT
- 7 RECREATION AND COMMUNITY
- 8 UTILITIES

(COLOR IN FINAL)

PLANNED LAND USE
SAN MATEO
MASTERPLAN
MARINE CORPS BASE, CAMP PENDLETON



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

IN REPLY REFER TO:

5700
July 24, 1996

California Coastal Commission
(Attn: Ms. Tania Pollak)
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

RECEIVED

JUL 25 1996

Dear Ms. Pollak:

CALIFORNIA
COASTAL COMMISSION

We would like to thank you for taking the time to meet with us on July 19, 1996. We are now better able to understand your questions and comments regarding the San Mateo Point Family Housing Draft Environmental Assessment (Draft EA). Issues of concern raised during the meeting included: water quality monitoring for affects on the San Mateo Creek, sewer service to the site, the viability for developing housing at one of the alternative sites that were identified in the Draft 1990 Marine Corps Base (MCB) Camp Pendleton Master Plan as expanded "development" areas, and the impacts of our proposed housing development on views from the beach. To follow up on these issues, we are providing the following additional information:

1. The Commission staff has expressed concern for the potential of non-point sources of pollution resulting from the proposed project having an effect on adjacent endangered species habitat on the slopes and in the estuary. As part of the project design, MCB Camp Pendleton has proposed the use of multiple detention basins, which will capture the 10% increase in surface runoff drainage expected from the development. These basins will also stabilize runoff thus allowing primary pollutants, which adhere to silt material suspended in the expected runoff, to settle out. Periodic maintenance of these basins will be performed, both during construction and quarterly thereafter, to ensure water quality is not degraded by an accumulation of silt in the basins. Natural filtering of runoff at the discharge points by native vegetation on the downslope areas will further protect water quality and flow characteristics to the estuary area, which is hundreds of feet downslope and in the floodplain. Best Management Practices, which have been incorporated in the design to reduce potential pollutant loads from this planned development include:
 - reduced street widths, to decrease areas of impervious surfaces;
 - regularly scheduled periodic street sweeping to reduce the primary non-point pollutant sources (litter accumulation and dry atmospheric fallout);
 - vegetation of permeable surface areas with both native, and drought tolerant plant species, which will attenuate loadings;
 - centralized lawn care and maintenance of common areas, to reduce pesticide and fertilizer use to the minimum necessary to retain vegetation cover;
 - and a prohibition against vehicular maintenance and an active inspection program in the housing area which will reduce urban runoff potential for oil, and other lubricating fluids.

EXHIBIT NO. 15
APPLICATION NO.
CD-50-95

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.

As well as being aesthetically pleasing, the measures included in these vegetation and storm water management plans are expected to reduce pollution loads by more than two orders of magnitude, when compared to the historic condition of the site, prior to the Coast Guard occupation, as an agricultural site with unprotected bare soils.

In discussions with the U.S. Fish and Wildlife Service (Service), leading to the final Biological Opinion (1-6-96-F-30), the Service concurred with the MCB Camp Pendleton representations that the San Mateo estuary Tidewater Goby population would not suffer ill-effect from this project, and was covered under existing management plans. The final opinion issued by the Service, reflects this, by reference to the overall ecosystem based, programmatic opinion (1-6-95-F-02) they issued to MCB Camp Pendleton for all endangered species in riparian, estuary and beach areas, and requiring the final non-point management plans associated with the development to be approved through an expedited consultation mechanism the programmatic opinion established (Class II letter). Base monitoring programs for this portion of the ecosystem have been in place for years, and include:

- vegetative transect monitoring;
- surface quantity monitoring (to include a gauging station at the base of the slope from this proposed project);
- periodic water quality sampling (although comprehensive data is unavailable due to the periodic drought, and fiscal limitations), and;
- non-point source pollution monitoring.

Historical, background water quality parameters, derived from the Base's sampling program, for the estuary at San Mateo are of better or similar quality for all categories (save nitrates, which may be the result of agricultural activity up-basin of the San Mateo estuary) as compared to the San Onofre estuary, three miles down the coast. However, despite having lower water quality, the San Onofre estuary currently has a larger population of the endangered Tidewater Goby than that supported by existing, baseline vegetative/use conditions at the San Mateo estuary. Further, the San Onofre estuary is subjected to greater, non-point storm runoff from multiple housing and light commercial areas than that anticipated by our proposed project. As recognized by the Service in its programmatic opinion, the greatest threat to the species in the San Mateo estuary is exotic varieties of frogs and fish, rather than non-point runoff. Consequently, the Service was able to "qualitatively" support MCB Camp Pendleton's position that non-point runoff concerns with respect to this species are addressed by existing management plans, and to only require addressal of specifics with our overall non-point pollution control strategy.

MCB Camp Pendleton intends to continue its ecosystem monitoring and to add non-point sampling in the vicinity of the outfalls for this development to its overall basewide program, to enable determination of long-term affects, if any, from this proposed development. Upon completion of design, MCB Camp Pendleton will coordinate final non-point runoff controls with the Service to gain their concurrence on the adequacy of these measures to protect sensitive species. We agree to keep this water quality monitoring plan at the project site and the San Mateo estuary in effect for at least two years and we will make reports of this monitoring program available to the Commission.

2. With regard to the issue of sewer service, the Draft EA states that the sewer service would be "...provided via a proposed utility corridor extending off-site and ultimately connecting with existing sewer lines within Basilone Road." The Commission staff expressed concerns regarding the potential impacts which might result from a sewer line break, specifically in the area of the San Mateo Creek. Since the publishing of the Draft EA, MCB Camp Pendleton has entered into discussions with the City of San Clemente regarding sewer service. MCB Camp Pendleton's preferred route for the sewer line is to connect to the City of San Clemente's existing line, approximately 1,500 feet from the entrance to the development on Avenida del Presidente.
3. The Commission staff has requested clarification regarding alternative sites on MCB Camp Pendleton for the siting of the family housing development proposed for the San Mateo Point site, specifically sites that had been identified in the Draft 1990 Marine Corps Base Camp Pendleton Master Plan. The Draft 1990 Master Plan was finalized in September 1992. In the Final Master Plan, the only site identified for housing in the northern portion of the base was San Mateo Point. Since the Final Master Plan was published, MCB Camp Pendleton identified another smaller site, in the San Onofre area of the base, for the potential construction of family housing. This site was evaluate as an alternative in the Draft EA.

Other sites were identified in the Draft Master Plan as having the potential for expanded "development". The areas in the northern portion of MCB, Camp Pendleton where such development could occur include camps: Pulgas, Horno, San Mateo, San Onofre, Cristianitos and Talega. These sites, also known as cantonment areas, are currently used to house the troops, tactical vehicles, and equipment of Marine Corps combat and combat support organizations assigned there. The Marine Corps units assigned to these cantonment areas of MCB Camp Pendleton routinely conduct both day and night operational and training exercises on the many live-fire ranges and maneuver areas located in proximity to each area. Expanded "development" of these areas would include expansion of these facilities in support of these training operations in the event of mobilization of Reserve forces, increased base loading due to closing of other facilities, or changes in the Marine Corps combat mission. Family housing would be incompatible in these areas due to the nature of the troop training activities and facilities located within these cantonment areas, to include operating and maintaining tactical vehicles (including tanks) and would subject the residents to unnecessary impacts with

regard to noise, safety and traffic. Areas compatible for family housing are areas that are in close proximity to support areas, such as, commissary, exchange, schools, and recreation facilities. The training areas are not located near such support areas.

The following information regarding MCB Camp Pendleton's Range Compatible Use Zone (RCUZ) Program may also prove helpful in explaining why no other areas within the northern portion of MCB Camp Pendleton are considered suitable for family housing. The RCUZ Program was established to provide guidelines for siting of future on-base facilities, including family housing developments. The general purpose of the RCUZ Program is to create, to the greatest extent possible, compatible land uses within MCB Camp Pendleton for the various types of facilities as they relate to noise and safety hazards generated by the many military training activities conducted at MCB Camp Pendleton. The RCUZ program identifies Noise and Range Safety Zones, which reflect the areas within MCB Camp Pendleton where the majority of these training activities occur. The primary objective of RCUZ is to preserve MCB Camp Pendleton's existing amphibious, ground, aviation range and training areas which are critical to MCB Camp Pendleton's ability to meet its National Security Mission of providing a realistic environment to train the Nation's Combat Marines.

Attached for your information is a pamphlet on the RCUZ Program which provides a brief overview of the purpose and use of this program. Also attached is a more detailed excerpt from RCUZ which more clearly defines the various required Safety Zones and identifies the types of facilities which are compatible with these zones (see Table 13). As you will note by referring to the overall MCB Camp Pendleton RCUZ map, a majority of MCB Camp Pendleton is overlain with Range Safety Zones A-D, making these areas totally incompatible with development of family housing. As noted in Table 13, residential housing is considered conditionally compatible with Range Safety Zone E. The San Mateo Point area of Camp Pendleton is located within Range Safety Zone E.

Additional sites have been identified for housing in the southern portion of the base, including DeLuz, Stuart Mesa, South Mesa/Wire Mountain, HQ Area/16 Area, and Serra Mesa. As reflected on page 1-1 of the Draft EA, there is a significant base-wide housing deficit. All of the areas identified for family housing in the southern portion of the base either have construction of new units underway (Stuart Mesa), are at full buildout (Serra Mesa), or have future junior enlisted units planned for construction in the near future (South Mesa/Wire Mountain, DeLuz, HQ Area/16 Area construction planned for FY 97, 98, 99 and 00).

4. Another issue of concern raised by the Commission staff is the view of the San Mateo Point housing development from the beach. MCB Camp Pendleton provided two new computer generated viewsapes showing the site's appearance from approximately 400 yards south of the site on the beach area above the tideline and from an area traveling northbound on I-5 approximately 1 mile south of the site. The viewscape from the beach area showed that only one roof of one building would be visible from this area of

the beach. Copies of these viewsapes were provided at the July 19th meeting and will be included in the Final EA, Comments and Responses. The Commission staff requested that MCB, Camp Pendleton provide one additional view further south down the beach. We agree to create one additional viewscape for the Coastal Commission hearing in August. In the interim, for comparison purposes, enclosed are photos taken from the beach showing the existing private sector homes that are adjacent to the proposed San Mateo Point site. A map showing the approximate location where the photos were taken has also been included.

Although not included within the EA as an alternative site for the proposed development, as we discussed during our July 19 meeting, we understand that the Commission has been provided with an alternative proposal from the Surfrider Foundation. While the Surfrider Foundation has not formally proposed this alternative to the Base as a part of the NEPA process, we have preliminary examined this informal proposal. Based on known resource information and that obtained from the Foothill Transportation Corridor Agency as a part of its preliminary examinations for its planned freeway, we believe development of this region of the Base and the State Park would have significant adverse effects, many of which may extend into coastal zone. When compared to our proposal for the project at San Mateo Point, we do not believe the Surfrider Foundation's proposal is a viable alternative. Among the concerns with this proposal are:

- a. The Surfrider alternative places structures in the 100-year floodplain of Cristianitos Creek and the confluence of San Mateo Creek and Cristianitos Creek, requiring flood control measures which would be in conflict with existing Federal Executive Orders and the programmatic opinion previously issued by the service (1-6-95-F-02).
- b. Potential direct and indirect affects to at least the four known California gnatcatchers that occupy a portion of the site, as well as, numerous Southwestern Arroyo Toads known to occupy the creeks and drainage in this area.
- c. Unknown, but reasonably foreseeable effects to the endangered Pacific Pocket Mouse population recently found adjacent to the proposed Surfrider alternative and potential effect to the listed Riverside/San Diego fairy shrimp species in vernal pools in the area.
- d. Potential indirect effects to the Least Tern, Western Snowy Plover and the Tidewater Goby by increased sedimentation, and non-point pollutants through an extensive change in vegetative cover in the upper watershed which would be engendered by the Surfrider alternative.
- e. The development of this site would sever a significant wildlife connection between MCB Camp Pendleton and the Southern Orange County Natural Community Conservation Plan (NCCP) area.
- f. Potential impacts to surface and subsurface water quality in the Base's highest quality aquifer, caused by increased erosion, sedimentation, point and non-point pollution, and irrigation on sloped areas.

g. Extensive impacts to jurisdictional wetlands, riparian and upland sensitive species habitat and loss of floodplain.

h. Potential effects to two known archeology sites, as well as, a State Historic Landmark.

i. Increased susceptibility to wildland fire.

j. The Surfrider proposal includes a golf course which would entail a significantly larger area than that included in the San Mateo Point site. Additionally, only a portion of the proposed site is in the State Park Lease area of MCB Camp Pendleton, and, the rest is on-base MCB Camp Pendleton, resulting in the loss of existing training areas and an incompatible land use with these training areas.

Thank you again for taking the time to meet with us. If you have any additional questions, please feel free to contact Mr. Paris Houshmand, Camp Pendleton Design Manager, at (619) 725-6040 or Ms. Andrea Marks, Naval Facilities Engineering Command, Housing Planner, at (619) 532-3801.

Sincerely,



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

Enclosures:
Photographs and Photograph Map
RCUZ pamphlet

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200



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APPENDIX A: CD-50-95 (San Mateo Point Housing, Camp Pendleton, San Diego County)

Attached are letters from Congressman Bilbray, the Audubon Society, the American Oceans Campaign, the Surfriders Foundation, and several letters representative of the over 500 letters received by the Commission staff for this project.

BRIAN P. BILBRAY
49TH DISTRICT, CALIFORNIA

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SUBCOMMITTEE ON
HEALTH AND ENVIRONMENT

SUBCOMMITTEE ON
COMMERCE, TRADE, AND
HAZARDOUS MATERIALS



Congress of the United States
House of Representatives
Washington, DC 20515

July 8, 1996

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Mr. Louis Calcagno, Acting Chairman
and Commissioners
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Dear Mr. Calcagno:

Re: Item 13A, Wednesday, July 10, 1996, Marine Corps Housing, Camp Pendleton

This letter is being written in opposition to a Marine Corps proposal to build 128 homes on San Mateo Point on Camp Pendleton. This issue is important to the integrity of the California coastline and to the surfing community in Southern California. San Mateo Point is adjacent to Trestles Beach, a world famous surf spot. It would be a shame to see such a visually sensitive, as well as culturally and historically significant, headland lost to inappropriate development.

The Surfrider Foundation in cooperation with the city of San Clemente and the State Park has proposed an alternative site on Camp Pendleton that would include more officer housing units, at less cost to taxpayers, and be built around a golf course. I understand your legal authority over this project may be somewhat limited but I urge you to voice your strong objection to the Marine Corps' San Mateo Point proposal.

As a former Coastal Commissioner and a surfer who has caught a few waves at Trestles in my lifetime, I would urge you to consider the long term effort of the State Park Service to include this land in their lease. The area is part of Southern California history and I believe the highest and best use of San Mateo Point would be the preservation of this coastal asset and the opening of the site to public access.

Sincerely,


Brian Bilbray
Member of Congress



Napa-Solano Audubon Society

Post Office Box 5150

Vallejo, CA 94591

RECEIVED
JUN 20 1996
CALIFORNIA
COASTAL COMMISSION

June, 15, 1996

Ms Tania Pollak
California Coastal Commission
45 Fremont Street
San Francisco, CA 94105

Re: Proposed Marine Corps Officer Housing at
San Mateo Point, Orange County

Dear Ms Pollak:

Trestles Beach is a place of legend in California. To surfing and watersport enthusiasts around the country and as far away as Australia and Europe, it is famous as one of the places to visit and enjoy.

To wildlife and ecosystem advocates like us in Northern California, it represents another piece of critically important land that needs to be protected from the juggernaut of development in a part of the state already overstressed by human encroachment.

We are impressed that that San Mateo Point has been identified as a "high-priority" acquisition by the California Coastal Conservancy; and that the land, if left vacant, will be a buffer zone for adjacent wetlands relative to nearby urban areas. We are dismayed that the U.S. Marine Corps would be allowed to develop housing on a parcel of land within such a sensitive area when Camp Pendleton itself affords 150,000 acres from which a suitable site for officer housing could be found.

We, therefore, request that the comments contained in this letter be considered when making your decision on San Mateo Point.

Sincerely,

Peter S. Whyte
Chapter President

June 18th, 1996



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JUL 08 1996

AMERICAN OCEANS CAMPAIGN

CALIFORNIA
COASTAL COMMISSION

Tania Pollack
California Coastal Commission
45 Fremont St.
San Francisco, CA 94105-2219

Dear Ms. Pollack,

I am writing to you on behalf of American Oceans Campaign, in regard to the Marine Corp's proposal to erect a 128-unit housing development at San Mateo Point. The sensitive location, as well as several other significant factors demand that San Mateo Point remain a pristine coastal site, free of developmental encroachment.

San Mateo Point acts as a natural buffer, protecting the San Mateo Wetlands from urbanization. Absent this natural buffer, the Wetlands will be rendered defenseless against development. The proposed construction would act as a catalyst upon the "hardening" of the coast. Hardening refers to creating an impervious surface, which results in increased storm water runoff, due to non-surface absorption. Ongoing runoff and urban storm water runoff from the project will have significant negative impact on the adjacent wetlands. In the event of a sewage break, the damage to the wetlands could be high. And if the wetlands are impaired, water quality in the lineup will deteriorate dramatically.

This site is a former Native American village, the historical society has listed it on the proposed national register. The proposed construction site harbors one of the most renowned, and premier surfing locations in California. Each year thousands of surfers ride the waves at Trestles, many travel extensive distances to experience its waves and natural beauty. Qualities which are now being threatened by the proposed Marine Corp construction and which, if not prevented, will hasten the demise of both its environmental, as well as surfing lure.

The highest and best land use for the site would be to lease or give it to the California Department of Parks and Recreation. The area in question is bordered on three sides by state parks land and has been called a high-priority acquisition by the California Coastal Conservancy.

Alternatives do exist for the Marine Corps, which own 125,000 acres at Camp Pendleton. Included within this acreage are several adequate sites within a few miles of the coast. One of these sites could potentially support the new development, without destroying "Trestles," a California landmark to many. Thus, we urge you, as well as the entire commission, to vote against the Marine Corp's proposal to develop San Mateo Point.

Thank you for your time and your consideration.

Sincerely,

Michael Ryan
Assistant Policy Counsel
Tel.# (310) 576-6162
Fax.# (310) 576-6170

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09-01-95

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SEP 06 1995

CALIFORNIA
COASTAL COMMISSION

Mark Delaplaine
Federal Consistency Specialist
California Coastal Commission
45 Fremont, Suites 1900-2000
San Francisco, CA 94105-2219
FAX 415 904-5400

SBJ: San Mateo Point Housing

Dear Mark:

Thank you for your time and consideration of the enclosed. The San Clemente Chapter of the Surfrider Foundation has reviewed the Response to the Coastal Consistency Determination for Government Family Housing at San Mateo Point Marine Corps Base Camp Pendleton, California.

We have also held a community meeting, calling attention to the proposed development and asking for input to be directed at the Coastal Commission. A petition was developed and is being circulated around the community. I expect that the Coastal Commission will soon be the recipient.

At our public forum where over fifty local residents attended, it was asked why we have not seen nor have we heard of a public notice for a NEPA Environmental Assessment or Finding of No Significant Impact (FONSI). Have we missed the review? What is the public notice procedure and is it being followed? What is the current status of the NEPA document and can you assist us with obtaining a copy?

As to the Coastal Consistency Determination, the following concerns were expressed.

Some adamantly disagreed with the Marine Corps when they state that the City of San Clemente provides little opportunity for affordable housing. It was pointed out that from a historical perspective, there currently is a higher than average vacancy factor in the San Clemente housing market, with a higher number of single family and multiple dwelling units available on the market today. Proposed new development and the recent trend of lower real property values and lower interest rates has caused some adjustment and more affordable housing opportunities.

The reported purpose of the project is to provide base housing to officers who work in the northern portion of Camp Pendelton. While the land is technically on base, its location requires residents to leave "base" and travel along the city and San Diego county streets to regain access to the base.

There was agreement with the request made by the City of San Clemente that a new Traffic Study should be undertaken. Access to the proposed project is along a tight curve (posted 15 mph) on a two lane frontage roadway and adjacent to two freeway on/off ramps. At the present time, public access parking requires beach visitors to walk several blocks across and along busy streets (some sections without sidewalks or crosswalks), cross the freeway bridge and multiple on/off ramps which are not metered, to gain access to the trail head. If this project is developed, its entrance and traffic would be only a few yards away from the trail. The access trail is also part of the heavily used coastal bicycle route which continues north/south using this public beach access as part of the route. The addition of 128 units and attendant auto traffic will only add to the pedestrian and bicycle safety issues.

To many, the real issue of public interest was whether the project would harm the riparian, wetland, and lagoon habitat of San Mateo Creek. Currently the Project sight, in it's mostly undeveloped state, has acted as a buffer zone between City housing development and the wetland preserve and adjacent State beaches.

It was pointed out that residential developments, no matter how well designed increase urban runoff and wet weather flow that includes petroleum byproducts, pesticides and other residential and service chemicals that would be introduced into the storm water system. That the concept of zero runoff has not been demonstrated to date and even with best management practices and engineering controls, runoff into the wetland would occur. Removing the buffer and adding housing would not only have a negative impact on the marine resources, both in the coastal lagoon and wetland, but also the ocean into which they discharge. In this case, one of the most popular surfing areas in the United States.

In addition to urban runoff considerations, it was generally agreed that the idea of placing a high density family housing project adjacent to the wetland preserve, would lead to an increase of disturbance to the biological community. Children and pets playing or wandering, or otherwise entering into the wetland features, will shock the fragile dynamic currently in place. With a "forest" for a backyard, it was believed to be inevitable that increased play will occur within the fragile wetland area. That directly affects the aesthetic and biological values of the preserve.

The historical and cultural significance to the surfing community, whom over the years have been the vast majority of visitors to this area, continues to be the remote walk in nature of the location and the quality of the beach/surfing experience due in part to the natural state of the preserve as well as the quality of the waves.

The subject property adds to this "nature experience" by acting as a visual buffer from view points along the State beach and the bluff areas above, when looking north towards the adjacent San Clemente neighborhoods.

We also agreed with Mike Tope, Chief Ranger of the Pendelton Coast District of California Parks and Recreation, when he states that the projects residents will increase the demand for sanitary and public safety services on adjacent beaches. There is no provision to fund any additional public services or mitigate for the increased use. Nor is there a desire to embrace the necessity.

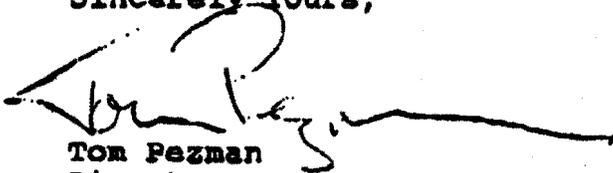
For the surfers who are volunteering their effort to help the State Parks maintain the access parking, and keep the beach area and wetland preserve in as natural a state as possible, (Surfrider Foundation with the corporate support of Surfing Magazine has formally adopted the Trestles Beach area) the motivation is in keeping with the desire to see this area retain the remote feeling and keep the visitor facilities as few as possible. We don't want more restroom structures, more lifeguard towers and more visitor facilities affecting the visual landscape.

Many of the meetings participants felt it wasn't logical to allow this sight to be developed, when the California Department of Parks and Recreation has offered to swap land from their lease hold property that would be a more suitable parcel for development and with significantly fewer potential negative impacts to the wetland preserve. A parcel which is on the Camp Pendelton base and more directly assessable by the Marine Corps.

Finally, this is not the only potential development being considered for the location and we must consider the cumulative effects to this coastal area. Also proposed and I'm told being approved, is a forty acre sewage percolation pond as well as a new freeway corridor that if built as proposed, would follow the San Mateo Creek and overpass the existing freeway linking at Basilone Road, again encroaching on the wetland preserve.

We thank you for your time and consideration as well as the opportunity to provide input on this issue.

Sincerely Yours,



Tom Pezman
Director
Surfrider Foundation

Tania Pollak
California Coastal Commission
45 Fremont St.
San Francisco, CA 94105-2219

JUL 12 1996

COASTAL COMMISSION

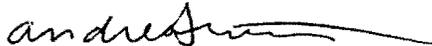
Dear Mrs. Pollak,

I am writing the Coastal Commission to express my opposition to the United States Marine Corps' plan to build officer housing on San Mateo Point at Camp Pendleton. I feel that this development would have a severe negative impact on the public's enjoyment of this beautiful natural area.

I have been visiting the Trestles Beach area for many years. The area has provided my friends and I an experience that is increasingly impossible to find in Southern California. The opportunity to leave behind the noise and sprawl of suburbia and enjoy ourselves in a beautiful natural setting means a lot to myself and many others who frequent the beach. I feel that a development on the bluff at Cotton's Point would ruin the quality of this experience with its visual impact, noise, traffic, and toxic runoff.

Furthermore, the Marines have hundreds of thousands of acres at their disposal for an alternate site. There is no alternative for the people who seek the experience that Trestles provides. I feel that the housing project is definitely not the best public use for this coastal land. I urge you to please deny the project a permit, and have the Marines find another site for their housing.

Thank you,



Andrei Fintescu

Tania Pollak
California Coastal Commission
45 Fremont St.
San Francisco, CA 94105-2209

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JUN 28 1996

CALIFORNIA
COASTAL COMMISSION

Dear Ms Pollak —

I urge you to oppose the housing development proposed by the Marines on the Ocean side of the 5 freeway @ Camp Pendleton on San Mateo Point.

One of the last undeveloped areas along the Southern California coast is the Camp Pendleton area. There are numerous areas on the base for suitable for building officer housing. If the San Mateo Point area is developed, there will be the inevitable problems that always follow eg. runoff, pollution, sewer lines that break etc.

This San Mateo Nature Preserve should be left alone and remain open space for all to enjoy it not just a few officers and their families. Sincerely Gary Reed

GARY Reed
P.O. Box 860

DANA Point, CA 92629

Michael L. Weber
228-1/2 South Juanita Avenue
Redondo Beach, California 90277-3438

TEL: 310-316-0599
FAX: 310-316-8509

Email: MLeoWeber@aol.com

16 June 1996

Ms. Tania Pollak
California Coastal Commission
45 Fremont Street
San Francisco, CA 94105-2219



Dear Ms. Pollak:

I write to oppose the proposed Marine Corps' officer housing project at San Mateo Point. There are thousands of acres of alternatives to siting the project in this wonderfully open area sitting above a vulnerable wetland area. If allowed to go through, this project will whittle away yet another piece of a California coastline that already has lost 90 percent of its wetlands, much of its bluff areas, and much of its openness. The project also will remove a critical buffer between the wetlands of San Mateo Reserve and growing urban areas to the north. Such buffers are priceless investments in maintaining remaining coastal wetlands and water quality.

Please, press the Marine Corps to identify alternative sites. Surely, there are such alternatives in the 125,000 acres of Camp Pendleton. With all due respect to the Marine Corps' officers, Cotton's Point is no place for officer housing.

Thank you for considering my views.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael L. Weber".

July 17, 1996

Ms. Tania Pollak
California Coastal Commission
45 Fremont St.
San Francisco, CA 94105-2219

JUL 23 1996

COASTAL COMMISSION

Dear Ms. Pollak,

I am opposed to the Marine Corps' plan to build officer housing on San Mateo point, AKA "Cotton's Point," at Camp Pendleton, California. The proposed development will forever change and disrupt Trestles Beach and the San Mateo Nature Preserve.

Today, many of us live in urban communities. While they do offer proximity to work, recreation, and people, cities are invariably short on "sanctuary." By sanctuary I mean a quiet, tranquil place away from concrete, cars, fast food restaurants, garbage, and the constant hum of city background noise that most of us are familiar with.

I believe that most people have a sanctuary of their own -- Griffith Park in Los Angeles; Central Park in New York; Golden Gate Park in San Francisco; the hills east of Santa Cruz -- a place people keep in the back of their mind and, when the din of city noise reaches that certain point, they know they can escape to that sanctuary for some much needed rest. Quite simply, these sanctuaries play a critical role in the mental health of a community.

Trestles Beach and the San Mateo Nature Preserve are indeed sanctuaries for many in southern California. The proposed growth will benefit a relative few, while a community of many thousands will lose a beautiful natural resource.

The punchline Building 128 housing units on this location will disrupt the enjoyment of this precious sanctuary for thousands of people. I ask you to reconsider and build this housing somewhere else.

Sincerely,



Wayne Hart
130 Roycroft Ave. #301
Long Beach, CA 90803