

CALIFORNIA COASTAL COMMISSION

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

Tu 10e

**STAFF REPORT AND RECOMMENDATION****ON CONSISTENCY DETERMINATION**

Consistency Determination No.	CD-169-97
Staff:	MPD-SF
File Date:	12/9/97
45th Day:	1/23/98
60th Day:	2/7/98
Commission Meeting:	1/12-16/98

FEDERAL AGENCY: U.S. Navy

DEVELOPMENT

LOCATION: Naval Amphibious Base (NAB), Coronado, San Diego County (Exhibit 1).

DEVELOPMENT

DESCRIPTION: Construct a replacement waterfront facility to support Navy explosives ordnance disposal operations (Exhibits 2-4).

SUBSTANTIVE FILE DOCUMENTS:

1. CD-15-81 (U.S. Navy, NAB Master Plan)
2. CD-88-96 (U.S. Navy, Waterfront Operations Facility)

EXECUTIVE SUMMARY

The U.S. Navy (Navy) has submitted a consistency determination for the relocation of a waterfront operations facility to the northwest corner of the Naval Amphibious Base (NAB) in Coronado, to replace existing temporary facilities at the NAB used by the Explosive Ordnance Disposal Mobile Unit Three (EOD Unit). The facility is needed to support boating, marine mammal, operations, and administrative functions of the EOD Unit. The project includes a 2-story operations and maintenance building, a boat launching ramp, a jib crane pier, demolition of a pier and a temporary building, relocation of floating causeways and marine mammal pier and pens, and security fencing and landscaping. The project will result in an unavoidable loss of 0.05 acres of eelgrass habitat; however mitigation for that impact has been incorporated into the project. The demolition, construction, and relocation of several in-water structures will lead to a net reduction in shaded waters adjacent to the NAB and is a project benefit. All in-

water construction activity will be scheduled to avoid the nesting season of the California least tern. Public access and recreation would not be affected as the shoreline adjacent to the project site is not publicly accessible due to military security needs. The project is located within a developed area of the NAB and would be visually compatible with surrounding development. The project is consistent with the marine resource, environmentally sensitive habitat, visual resource, and public access and recreation policies of the California Coastal Management Program (Sections 30230, 30233, 30240, 30251, 30210, and 30212 of the Coastal Act).

STAFF SUMMARY AND RECOMMENDATION:

I. Project Description. The Navy proposes to construct a permanent waterfront operations facility at the northwest corner of the Naval Amphibious Base (NAB), to replace existing temporary facilities at the NAB used by the Explosive Ordnance Disposal Mobile Unit Three (EOD Unit)(Exhibits 1-4). The Navy states the project is needed to support the operational craft, marine mammals, EOD missions, and administrative needs.

The project would consist of construction of 2-story Operations and Maintenance structures, a 30 ft. wide boat launch ramp with approximately 72 feet extending past the bulkhead, and a concrete jib crane pier with mammal/boat floats. The Operations building would be a 2-story building housing: administrative support personnel; diving lockers; mechanical, storage, and academic instruction space; and marine mammals support services. The 2-story Maintenance building would house an automotive/tire repair shop, parachute/survival shop, boat shop, engine repair shop, and storage areas. Marine mammal systems would be moved from the current location on the south side of NAB to the project site. Any explosives recovered during operations would not be stored at NAB but in an ordnance magazine at Naval Air Station, North Island or Camp Pendleton.

Site grading and improvements include paving, sidewalks, extension of base utility services, area lighting, demolition of one existing temporary structure (Q40), and asbestos abatement. Security fencing and landscaping would be provided. One 5,000-gallon gasoline aboveground storage tank (AST) is also proposed.

In addition, the proposed project would include constructing a short concrete pier with jib crane to provide waterfront loading capacity and transferring marine mammal systems from their present location to the waterfront area at the proposed location. The marine mammal systems are floating enclosures presently attached to concrete pilings at the southeast corner of NAB. The concrete pilings would be removed and reinstalled at the proposed location using a crane-mounted barge anchored offshore for about a 1-week period. Before the marine mammal systems could be relocated, several floating causeway docks that are presently anchored at the proposed location would need to be relocated. These floating causeway docks would be relocated to the end of Pier 19 on the south side of NAB. The existing pier at the project site would be demolished to make room for the jib crane pier and marine mammal systems.

No dredging is required or proposed for this project and in-water construction would be limited to the boat launch ramp segment bayward of the existing quay wall, pile driving for the jib crane pier, removal of the existing CB pier, and relocation of marine mammal pier and pens and the floating causeway sections. Construction is expected to take eight months (commencing in 1998) and will occur outside the California least tern nesting season.

II. Project History. The project is the resubmittal of a previous consistency determination (CD-88-96), which was originally submitted on August 6, 1996, but subsequently withdrawn by the Navy. The current project has been modified to some degree, including lowering the Operations building height from three stories to two, and removing a 76 ft. high paraloft tower at the northern corner of the base.

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

IV. Federal Agency's Consistency Determination. The Navy has determined the project consistent to the maximum extent practicable with the California Coastal Management Program.

V. Staff Recommendation:

The staff recommends that the Commission adopt the following motion:

MOTION. I move that the Commission concur with the Navy's consistency determination.

The staff recommends a **YES** vote on this motion. A majority vote in the affirmative will result in adoption of the following resolution:

Concurrence

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

VI. Findings and Declarations:

The Commission finds and declares as follows:

A. Marine Resources/Environmentally Sensitive Habitat.

1. Coastal Act Policies. Section 30230 of the Coastal Act provides:

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

Section 30233 provides in part:

(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

(1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities. ...

(4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities. ...

Section 30240 provides in part:

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

(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 ... areas.

The proposed project includes several in-water components that hold the potential to adversely affect marine resources: (1) construction of a boat launch ramp at the project site; (2) relocation of floating causeway sections from the project site to Pier 19 on the south side of the NAB; (3) demolition of an existing pier at the project site; (4) construction of a new jib crane pier at the project site; and (5) relocation of the existing marine mammal pier and pens to the project site. These activities (except for the pier demolition) involve fill of estuarine coastal waters and as such must pass the allowable use, alternatives, and mitigation tests of Section 30233 of the Coastal Act.

The proposed boat launch ramp, jib crane pier, floating docks, and marine mammal pier and pens serve a coastal dependent Navy port facility and are therefore allowable uses under Section 30233(a)(1). Section 30233 also requires that there be no feasible less environmentally damaging alternatives to the proposed project. The Navy examined several alternatives to relocating the EOD Unit to the proposed site:

Under a no action alternative, the EOD Unit would continue to operate at a diminished capacity at its present location at the NAB because of inadequate facilities that do not meet current safety standards. The proposed relocation would provide a protected area for marine mammals which at their present location are exposed to southern storms and wakes from boat traffic. If the no action alternative were selected, the U.S. Environmental Protection Agency-mandated Installation/Restoration Project at the site of the present EOD Unit facilities could not be accomplished. Therefore, the no action alternative was considered unacceptable.

Other alternative sites at NAB were eliminated from consideration because no other existing facilities are available to house EOD Unit operations, and other NAB sites to develop a new facilities are constrained.

Relocating the EOD Unit to facilities remote from NAB would be feasible but would severely impact the daily operations of the mission because Navy personnel would need to be transported to the marine mammal systems whenever it was necessary to work with marine mammals.

A reduced size facility was examined but was considered unacceptable because the proposed facilities are the minimum size to support the EOD Unit mission.

Given the coastal-dependent nature of the EOD Unit facility, the requirement to be located adjacent to the waterfront, and the need to remain at the NAB, the Commission agrees with the Navy that there is no feasible less environmentally damaging alternative to relocating the EOD Unit facility to the proposed site.

Next the Commission must determine the need for and type of mitigation necessary to minimize any adverse environmental effects generated by the proposed project. Relocation and demolition of existing in-water structures and construction of new in-water structures will result in changes to marine habitats in and the amount of shading of shallow bay waters adjacent to the NAB. The demolition of the existing CB Pier at the proposed EOD Unit site, the relocation of floating causeway sections from that site to Pier 19 at the northeast corner of the NAB, the construction of the new jib crane pier at the proposed site, and the relocation of the marine mammal pier and pens to the proposed site will result in a net reduction of shaded bay waters at the NAB by 1.26 acres. The Navy believes that approximately 0.39 acres of this newly-uncovered water area at the proposed EOD Unit site could serve as California least tern foraging habitat, and that much of the 1.26-acre area could support the growth of eelgrass beds.

Relocation of the floating causeway sections to Pier 19 and construction of the boat ramp will result in a loss of approximately 0.05 acres of eelgrass. Construction of the boat ramp will also result in the loss of approximately 0.01 acres of rip rap habitat (at the existing quay wall) and 0.03 acres of soft bottom habitat. Construction barge anchors will temporarily disturb approximately 280 sq. ft. of soft bottom habitat. Concrete pilings which support the marine mammal pier and pens will be reused at their new location, leading to no soft-bottom habitat loss or gain.

Thus, the proposed project will generate both adverse as well as beneficial effects on marine resources adjacent to the NAB. Except for the loss of eelgrass, the adverse effects on rip rap and soft bottom habitat are not significant and do not require additional mitigation. However, the expected loss of approximately 0.05 acres of eelgrass presents a cumulatively significant adverse project impact due to the importance of eelgrass beds as a particularly valuable type of marine habitat in San Diego Bay. While the Navy believes that the exposure to sunlight of 1.26 acres of shallow water, soft bottom habitat at the proposed EOD Unit site could lead to eelgrass revegetation, and that the project would therefore lead to a net increase in eelgrass beds at NAB, it nevertheless has proposed the following mitigation program for eelgrass impacts should natural revegetation not occur:

- * The construction barge should be anchored to avoid or minimize impacts on eelgrass. Eelgrass is the least extensive in the northwest portion of the project area. It may be possible to avoid anchoring in eelgrass if the barge can anchor there.
- * Eelgrass should be monitored following project construction to determine whether eelgrass was lost to shading at the floating causeway relocation site and whether previously shaded areas at the P-144 site have revegetated.
- * After two growing seasons following construction, if there is a net eelgrass loss to construction of P-144, the loss should be mitigated. The Navy has established eelgrass mitigation sites to compensate for eelgrass losses due to in-water

construction projects. Two of the Navy Eelgrass Mitigation Sites (NEMS) are on NAB. NEMS 1 is 2.83 hectares and NEMS 4 is 0.40 hectares. Eelgrass losses due to P-144 would be mitigated at one of these existing NEMS.

With the Navy's commitments to avoid eelgrass beds during in-water construction, to generate a net reduction in structural shading of shallow bay waters that can support eelgrass beds, and to provide mitigation at its existing eelgrass mitigation sites should the project cause a net loss in eelgrass, the Commission finds that the project's impacts have been adequately mitigated and that the project is consistent with the Sections 30230 and 30233 of the Coastal Act.

The project will occur within the foraging area of the federally endangered California least tern (Exhibit 7). The Navy states that potential impacts on the least tern include displacement from this portion of their foraging habitat due to increased human presence and construction noise, and temporary degradation of foraging habitat due to turbidity from disturbance of soft bottom habitat. To avoid impacts to the least tern, the Navy will undertake project construction outside the least tern nesting season, between September 15 and April 1. In addition, removal of the existing CB Pier at the project site will result in a small but permanent gain of 0.26 acres of shallow water foraging habitat. With these provisions, the Navy concludes that the project will not adversely affect least tern habitat. The Commission agrees and finds the project consistent with Section 30240 of the Coastal Act.

B. Public Access. Section 30210 of the Coastal Act provides:

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 safety needs and the need to protect public rights, rights of private property public owners, and natural resource areas from overuse.

Section 30211 provides:

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 provides 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....*

The Navy states in its consistency determination that the proposed relocation of the EOD Unit is consistent with the public access policies of the Coastal Act. The proposed waterfront operations facility will not affect public access because the shoreline adjacent to the site and waters extending 200 feet into San Diego Bay are not now publicly accessible due to military security needs. Due to the lack of burdens on public access generated by the project, and the military security needs which have traditionally been accepted by the Commission at the NAB, the Commission finds that the project consistent with the public access and recreation Sections 30210, 30211, and 30212 of the Coastal Act.

C. **Visual Resources.** Section 30251 of the Coastal Act provides 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 proposed upland and in-water facilities would be consistent with the existing type and intensity of naval industrial development on the north side of the NAB. The height and architectural character of the proposed structures would be compatible with adjacent structures at the NAB. In addition, the Navy has redesigned the project to minimize visual impacts, including reducing the height of the operations building from three stories to two, and eliminating the originally-proposed 76-foot high paraloft tower, which would have been higher than other structures on the base. With these modifications, the project will not significantly alter nor adversely affect the character of the NAB or public views to the NAB from San Diego Bay, Coronado, or the San Diego-Coronado Bay Bridge. The northeast corner of the NAB is already heavily developed and not particularly scenic. The Navy concludes that existing coastal views towards the NAB would not be significantly degraded by the proposed facility. The Navy states:

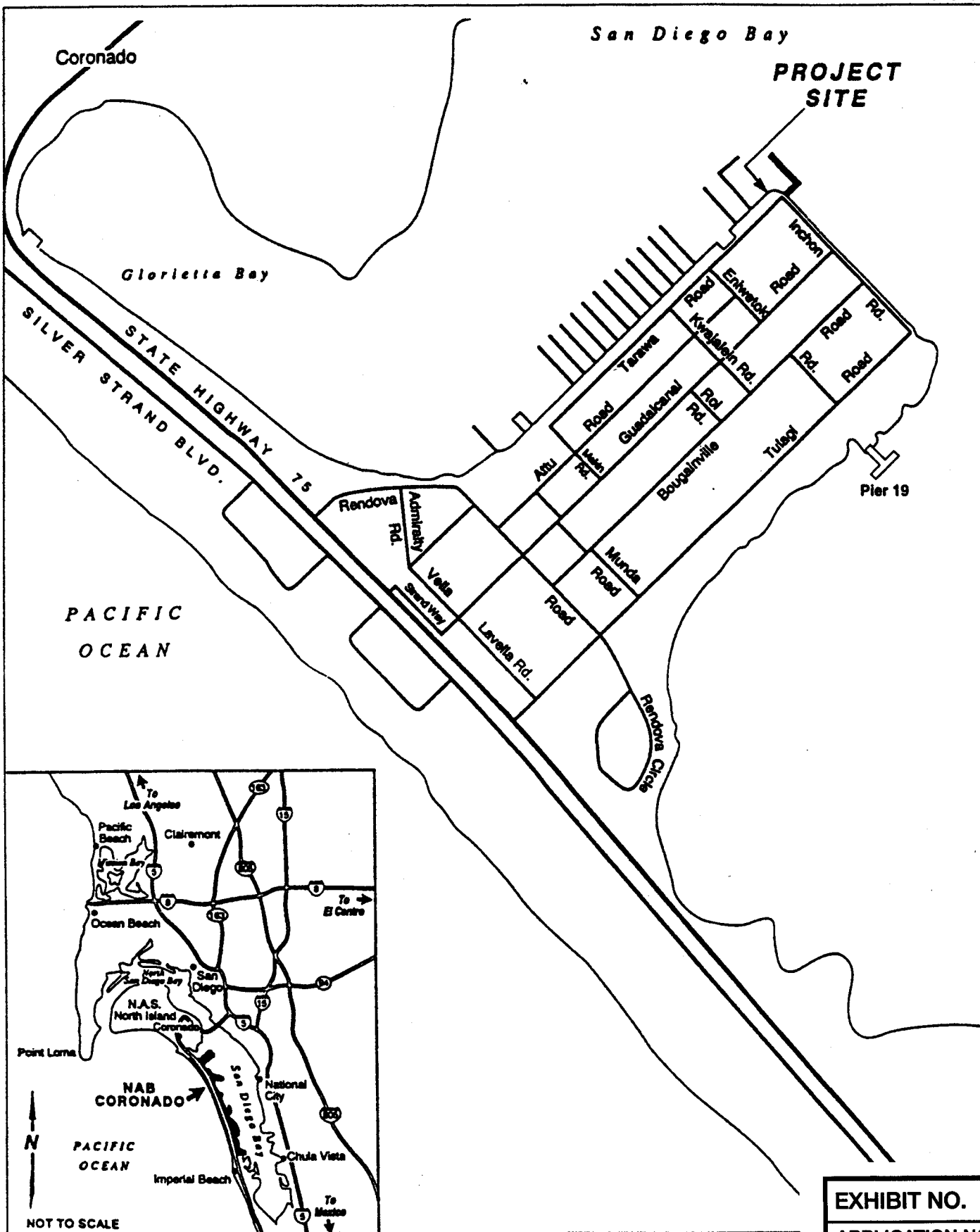
Comment: The proposed project will occur in a coastal area already highly developed by the Navy. NAB Coronado is an active shore base, which has an industrialized appearance associated with the intensive shore activity of a Naval installation. NAB Coronado area is not considered to be an important visual resource, compared to other ocean and scenic coastal areas within the coastal plain area of San Diego Bay. The bayside of the NAB is visible to the general public from San Diego Bay, the City of Coronado, and by motorists crossing from the City of San Diego to the City of Coronado on the San Diego-Coronado Bay Bridge. The construction duration would

be relatively short and would not have a significant impact on visual resources. The proposed EODMU THREE Waterfront Operations Facility would be constructed to be compatible with the surrounding architectural character of adjacent uses at the NAB. Thus, the proposed project is consistent to the maximum extent practicable with this policy section.

The architectural appearance would be in accordance with NAB Base Exterior Architecture Plan (BEAP) and in scale with the adjacent structures. ... Landscaping would be provided to improve the visual appearance of the project.

The City of Coronado has written a letter to the Commission expressing concerns over visual and other impacts from the proposed project. This letter is attached as Exhibit 6. The City requests better graphics, clarification of traffic impacts, information about noise and hours of operation, assurance that the originally proposed paraloft tower is not being segmented, information about height and square footage of proposed buildings, clarification about architectural styles, and other matters. The Navy states it will respond in writing to the City on each point; however it has not done so as of the date of publication of this staff report. Any such response by the Navy received prior to the Commission meeting will be transmitted to the Commission and the City prior to or at the public hearing in January.

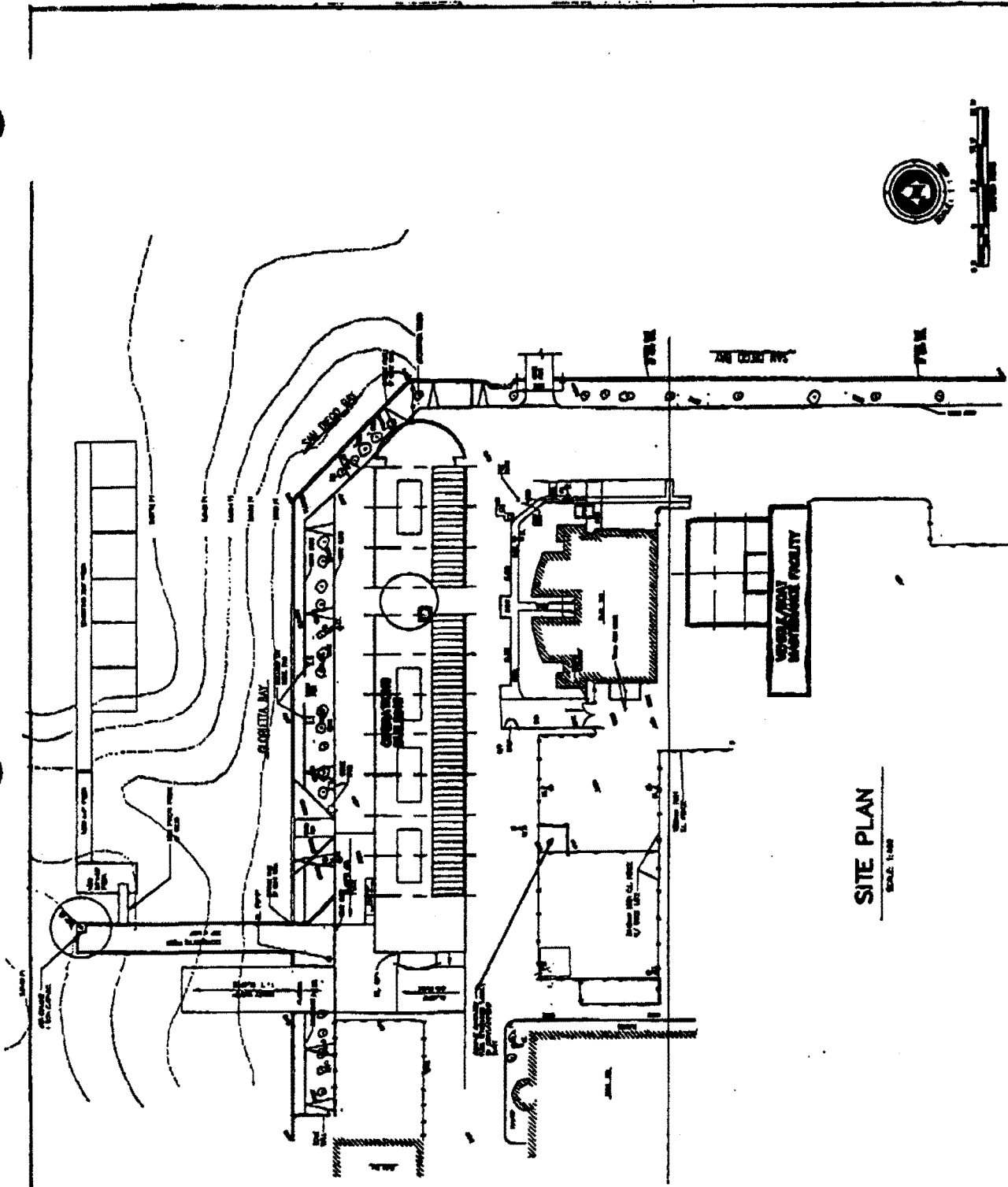
While the Commission urges the Navy to respond to the City's questions, the Commission nevertheless agrees with the Navy's conclusion that the project will not adversely affect public views and will be visually compatible with the character of the surrounding area. The Commission therefore finds the project consistent with Section 30251 of the Coastal Act.



Feet
0 800
N Source: United States Navy

PROJECT

EXHIBIT NO.	1
APPLICATION NO.	
	CD-169-97
	Navy



SITE PLAN
SCALE: 1/8" = 1'-0"

EXHIBIT NO. 2
APPLICATION NO.
CD-169-97

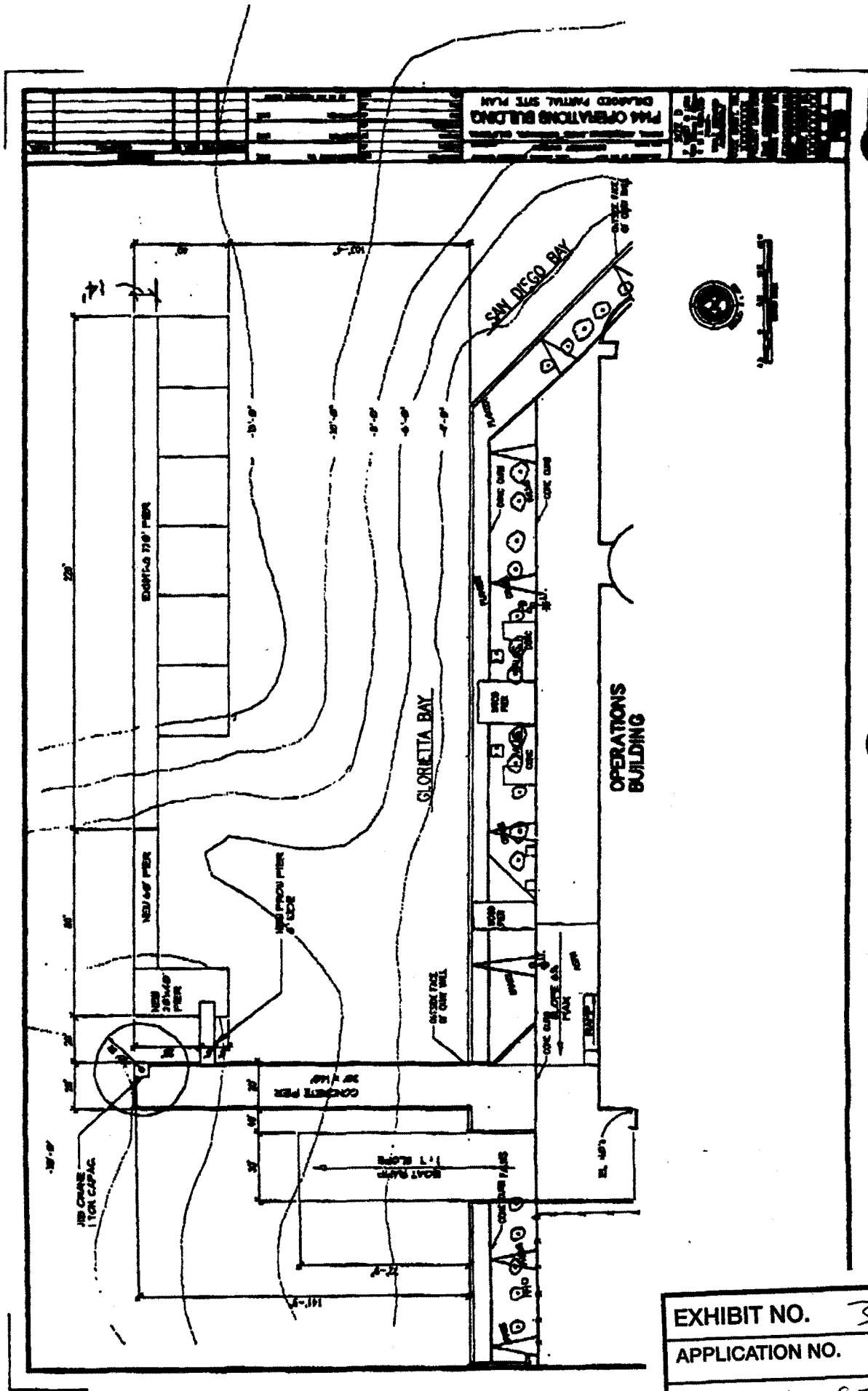
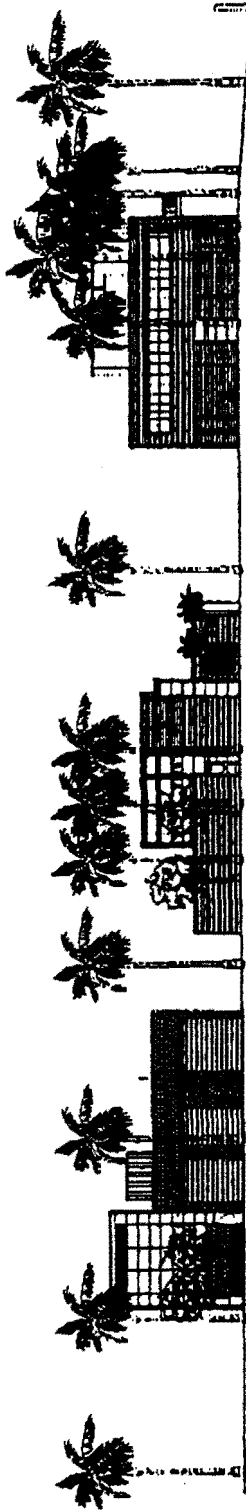


EXHIBIT NO.	3
APPLICATION NO.	CD-169-97



EAST ELEVATION

SCALE: 1:400



NORTH ELEVATION

SCALE: 1:400

EXHIBIT NO.	4
APPLICATION NO.	
	CD-169-97

BAY COVERAGE

Change in Bay Coverage from Navy Wharves, Piers, and Floating Docks

0.3048 m/ft

43560 SF/acre

10000 SM/hectare

Item	width (ft)	length (ft)	width (m)	feet (m)	SF	SM	Acres	Hectares
Ramp notch P-211 (NAB)	40	40	12.19	12.19	1600.00	148.64	0.04	0.01
New Pier P-211 (NAB)	-30	-455	-9.14	-138.68	-13650.00	-1268.13	-0.31	-0.13
Pier 15 Demo P-211 (NAB)	15	350	4.57	106.68	5250.00	487.74	0.12	0.05
Filng Pier Ex P-144 (NAB)	-14	-80	-4.27	-18.29	-840.00	-78.04	-0.02	-0.01
Brow P-144 (NAB)	-6	-20	-1.83	-6.10	-120.00	-11.15	0.00	0.00
New Pier Sec P-144 (NAB)	-20	-40	-6.10	-12.19	-800.00	-74.32	-0.02	-0.01
Jib Crane P-144 (NAB)	-20	-140	-6.10	-42.67	-2800.00	-260.13	-0.06	-0.03
CB Pier Demo (NAB)					15750.00	1463.22	0.36	0.15
Recreational Pier (NAB)	-14	-100	-4.27	-30.48	-1400.00	-130.06	-0.03	-0.01
Small Craft Pier P-187 (NAB)	15	412	4.57	125.58	-6180.00	-574.14	-0.14	-0.06
New Pier P-326 (NAVSTA)	-120	-1458	-36.58	-444.40	-174960.00	-16254.32	-4.02	-1.63
Pier 11 Demo P-326 (NAVSTA)	30	1458	9.14	444.40	43740.00	4083.58	1.00	0.41
Pier 10 Demo P-326 (NAVSTA)	30	1458	9.14	444.40	43740.00	4083.58	1.00	0.41
New Pier P-327 (NAVSTA)	-120	-1458	-36.58	-444.40	-174960.00	-16254.32	-4.02	-1.63
12 Demo P-327 (NAVSTA)	30	1458	9.14	444.40	43740.00	4083.58	1.00	0.41
P-700 Wharf (NASNI)	-90	-1300	-27.43	-396.24	-117000.00	-10869.66	-2.69	-1.09
Mark V mooring P-653 (NASNI)					-3096.00	-287.63	-0.07	-0.03
Mark V frag piers P-653 (NASNI)					-2486.00	-229.10	-0.06	-0.02
P-700A Wharf (NASNI)	-90	-1300	-27.43	-396.24	-117000.00	-10869.66	-2.69	-1.09
Pier J/K Demo P-700A (NASNI)					62360.00	5793.43	1.43	0.58
Pier 9 Demo (ASW)					12600	1171	0.29	0.12
Ferry Pier (ASW)					-2230	-228	-0.05	-0.02
P-122 Demo (SUBASE)	25	120	7.62	36.58	3000.00	278.71	0.07	0.03
P-122 Pens (SUBASE)	-12	-186	-3.66	-56.69	-2232.00	-207.36	-0.05	-0.02
TOTAL					-387954.00	-36062.51	-8.91	-3.61

Note 1: Calculation is for coverage only. Bay fill is usually mitigated by creating more bay through excavation.

Note 2: CB Pier Calculation based on 7 floating pier sections (25'x90') removed in May 1996. The CB Pier brow is not included in the calculation.

Quantity	width (ft)	length (ft)	width (m)	feet (m)	SF	SM	Acres	Hectares
7	25	90	7.62	27.43	15750.00	1463.22	0.36	0.15

EXHIBIT NO. 5
 APPLICATION NO.
 CD-169-97



**CITY OF CORONADO
COMMUNITY DEVELOPMENT**

PostNet	Date	# of pages
Fax Note #7673	12/16	3
To	Mark Delaplaine	
Fax#	(415) 904-5400	
From	Ann McCaul	
Phone#	(619) 522-7326	

1825 STRAND WAY
CORONADO, CA 92118

CITY HALL
(619) 522-7326

December 16, 1997

RECEIVED

DEC 16 1997

CALIFORNIA
COASTAL COMMISSION

Mr. Peter Douglas
Executive Director
California Coastal Commission
45 Fremont Suite 2000
San Francisco, CA 94105-2219

Re: Coastal Consistency Determination for Milcon Project P-144

Dear Mr. Douglas:

The City of Coronado appreciates the opportunity to comment on the above mentioned project. It is our understanding that the project also requires a Regional Water Quality Control permit, Army Corps permit and Environmental Assessment. Is the Environmental Assessment available to review in conjunction with the Coastal Consistency Determination? It is surprising that a Coastal finding can be made without detailed environmental information. The City would request delay in the determination until the environmental document has been revised to reflect the new project and can be reviewed simultaneously with the coastal determination application. This request is made because previous review of the project and associated environmental assessment and permit requests revealed inconsistencies in the project.

The City's previous comments on this project focused on the cumulative impacts of this project combined with other military construction projects occurring at both Naval Amphibious Base and North Island, especially regarding traffic. The City has repeatedly requested that the major materials items for this project, including the piles, be barged rather than trucked through the City. It is not clear what measures the Navy has incorporated into the project to reduce the impacts on our residential community. Listed below are some additional questions/clarifications regarding the project.

1. The fax the City received depicting the project area and structures was blurred and difficult to read. It also is not clear exactly where the project

EXHIBIT NO. 6
APPLICATION NO.
CD-169-97

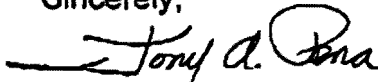
will be located and it appears to have changed from the original proposal. Clearer maps along with a vicinity map would be appreciated so that the City can fully understand the project and its potential impacts, if any, on the Scenic Highway.

2. The environmental assessment had previously identified the types of major materials items to be transported, the method of material transport, the number of estimated trips, the time of travel and duration of the project, and number of employees associated with construction. The City requests clarification on all of these issues (with the revised project) at the time of the Coastal review to ensure that traffic impacts are minimized. The City would further request that major material items such as piles and steel be barged, that any equipment delivered to the site or hauled away from the site occur during non-peak traffic hours, and SR-75 be used as the primary truck route.
3. The installation of the pier will require the use of a pile driver and likely generate a tremendous amount of noise. The construction should comply with the Coronado Noise Ordinance – especially pertaining to hours and days of construction to minimize impacts. What are the proposed hours of construction? What measures are being taken to minimize noise impacts?
4. Are additional personnel associated with the construction of new facilities?
5. The 76' tall paraloft tower was considered essential to the general operations unit. Is that tower going to be handled under a separate permit and would a coastal determination still be required for that tower? The City wants to ensure that the project is not segmented to the extent that an opportunity to review and comment on such a tall structure (which is out of scale with our community and may impact our efforts on improving the Scenic Highway) is not circumvented.
6. The coastal determination request indicates the structure is two-story. What is the height of this two-story building? What is the size of the building? The previous environmental assessment identified the structure as 49,000 square feet. Is it still this size or smaller?
7. The coastal determination indicates the architectural design of the project will be consistent with the BEAP. As indicated in previous correspondence to the Coastal Commission, there are several different types of architectural styles which can be found on the base. What will the style, colors and materials of the structures be? (Depending upon the location and building height of the structure this may not be a significant concern to the City.)

- 8. Is the existing quay wall still proposed to be raised to accommodate the Operations building?
- 9. Will any public utilities such as water, wastewater, and storm drain systems be affected that may impact City systems requiring upgrades?

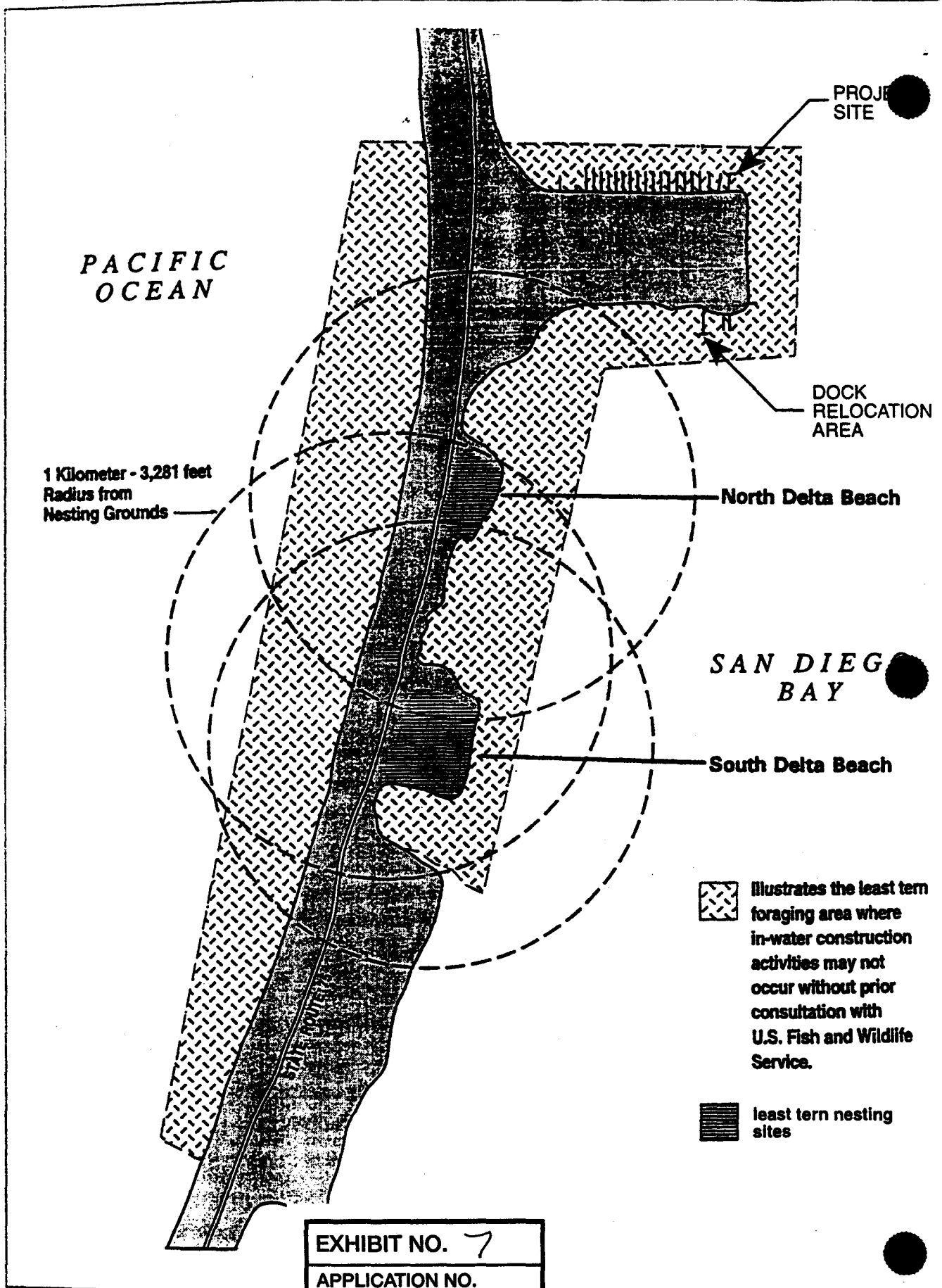
The City appreciates your consideration of the issues identified above. We want to be sure there is a clear understanding of the revised project before agencies approve or permits are issued for the project. Please contact Ann McCaull of my staff at (619) 522-7326 if you have questions regarding our comments.

Sincerely,



Tony A. Pena
Director of Community Development

cc: Homer Bludau, City Manager
Liza Butler, S.S.B.C



PACIFIC OCEAN

PROJECT SITE


DOCK RELOCATION AREA

1 Kilometer - 3,281 feet Radius from Nesting Grounds

North Delta Beach


SAN DIEGO BAY

South Delta Beach

 Illustrates the least tern foraging area where in-water construction activities may not occur without prior consultation with U.S. Fish and Wildlife Service.

 least tern nesting sites

EXHIBIT NO. 7
APPLICATION NO.
CD-169-97



 Feet

 0 ————— 2000

 Source: MOU between U.S. Fish and Naval Facilities Engineering

CALIFORNIA LEAST TERN FORAGING AREA AND NESTING GROUND IN VICINITY OF NAB CORONA
 Figure 3