

**CALIFORNIA COASTAL COMMISSION**

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# Th 5b

**STAFF RECOMMENDATION**  
**ON CONSISTENCY DETERMINATION**

Consistency Determination No.	<b>CD-6-98</b>
Staff:	TNP-SF
File Date:	12/23/1998
45th Day:	3/9/1998
60th Day:	3/24/1998
Extended to:	9/15/1998
Commission Meeting:	9/10/1998

**Federal Agency:**      **U. S. Air Force**

**Development**

**Location:**      Vandenberg Air Force Base, Santa Barbara County (Exhibit 1).

**Development**

**Description:**      Launch program for small, solid and liquid propellant theater ballistic missiles and sounding rockets from mobile launchers on various launch sites on Vandenberg Air Force Base (Exhibits 2-6).

**SUBSTANTIVE FILE DOCUMENTS:**

1. U.S. Fish and Wildlife Service Biological Opinion for the Theater Missile Targets Program, Vandenberg Air Force Base, Santa Barbara County, California, (1-8-98-F-24), May 27, 1998.
2. Final Theater Missile Targets Programmatic Environmental Assessment, Vandenberg Air Force Base, December 1997.

**Executive Summary**

On January 23, 1998, the Commission received a consistency determination from the Air Force for the Theater Ballistic Missile (TBM) Targets Program at Vandenberg Air Force Base. The program consists of launching small theater ballistic missiles and sounding rockets from mobile launchers on several launch sites on Vandenberg Air Force Base. In addition, larger

target missiles will be launched from a rail launcher. The proposed launch program will not require any construction of support facilities; the rail launcher will be located on an existing concrete pad or in area already graded or graveled. The Air Force proposes 30 launches per year, with an average of five launches every two months. Up to five launches could occur in a three day period for a particular exercise.

The proposal raises issues concerning sensitive species and public access opportunities. Vandenberg Air Force Base supports a wide range of sensitive species, including a number listed as threatened and endangered under the Endangered Species Act. Many of these species (Exhibits 7-8 & 12) are found at, or adjacent to, the proposed launch sites. It is unlikely that the Air Force can time its launches to avoid impacts to all sensitive species, particularly since different species' breeding and nesting seasons span much of the year. The Air Force has stated that the proposed project will not have a significant impact on sensitive resources. Missile launches will likely produce a startle response in many species, whereby individuals leave the location. However, missile launches on Vandenberg Air Force Base have been occurring for many years. The Air Force has stated that based on previous monitoring of missile launches, this startle response is temporary and does not lead to significant impacts, even during breeding and/or nesting seasons. Furthermore, the Air Force has completed its consultation with the U.S. Fish and Wildlife Service concerning the habitat effects from the program, which has led to incorporation of mitigation measures described on pages 7-9 designed to avoid any jeopardy to threatened and endangered species. These measures include restricting the most sensitive site, site 576E near Purisima Point (Exhibits 2 & 11), to a 3-month period of October through December each year. The focus of the Commission staff's concerns in reviewing this program has been determining whether use of this site at all, given the numerous and ostensibly less damaging alternative launch sites, is appropriate. The Fish and Wildlife Service has "required" a 9-month closure of this site but has "recommended" a full 12-month closure of this site. The Commission staff has requested that the Air Force delete this site from consideration; the Air Force has responded with the following commitment:

*... the site known as 576E will only be utilized by TMD during the 3-month period acceptable to Fish and Wildlife Service (see Biological Opinion) following prior coordination with California Coastal Commission staff. Information will be provided supporting this decision as being the least damaging alternative consistent with mission requirements. This information will consider other available launch sites, will describe habitat impacts that would occur at Site 576E, and will explain why site 576E must be used if other sites are available. In addition, the term "prior coordination" means that the CCC staff will be notified at least seven days before the launch.*

Nevertheless the Air Force has made no compelling argument that use of Site 576E for the program is necessary. Use of the site on a programmatic basis for an unlimited period of time is not warranted given the potential cumulative impacts, the open-ended, multi-year duration of the program, the relative significance of the Purisima Point area near Site 576E for the species that could be affected by launches at this site (i.e., wintering snowy plovers, nighttime brown pelican

roosting, and pupping sea otters) and the fact that numerous alternative launch sites are available for the program. Therefore, even with the commitments agreed to by the Air Force, the project is not consistent with the environmentally sensitive habitat and cumulative impacts policies (Sections 30240 and 30250) of the Coastal Act. Numerous alternative launch sites (i.e., the remaining launch sites proposed other than Site 576E) are available which would avoid these impacts.

The Air Force has committed to preventing any beach closures due to the proposed project. Therefore, public access opportunities to the beaches at, and adjacent to, Vandenberg Air Force Base will not be affected by the project. The project is therefore consistent with the public access and recreation policies (Sections 30210-30212) of the Coastal Act. The project is also consistent with the air quality policies (Sections 30253 and 30414) of the Coastal Act.

### **Staff Summary and Recommendation:**

#### **I. Staff Summary:**

**A. Project Description:** The Air Force proposes implementation of a Theater Ballistic Missile Targets program at Vandenberg Air Force Base in western Santa Barbara County. The program consists of the launching of small theater ballistic missiles and sounding rockets from mobile launchers on several launch sites on Vandenberg Air Force Base (Exhibits 2-6). In addition, larger target missiles will be launched from a rail launcher. The Air Force states the launch capabilities are needed to allow Vandenberg AFB to support Navy, Air Force, and Army operations in the western test range (Exhibit 11). The proposed launch program will not require any construction of support facilities. The rail launcher will be located on an existing concrete pad or in area already graded or graveled. The Air Force proposes 30 launches per year, with an average of five launches every two months. Up to five launches could occur in a three day period for a particular exercise. The exercises would include intercepts by defensive missiles of the launched rockets over open ocean areas. Potential launch sites occur in both northern and southern Vandenberg Air Force base (Exhibit 1); the 18 sites have been grouped into five general areas, three in north Vandenberg (Exhibit 2) and two in South Vandenberg (Exhibit 3).

**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 LCP for Santa Barbara County has been incorporated into the CCMP.

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

## II. Staff Recommendation:

The staff recommends that the Commission adopt the following motion:

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

The staff recommends a **NO** vote on this motion. Failure to receive a majority vote in the affirmative will result in adoption of the following resolution:

### Objection

The Commission hereby **objects** to the consistency determination made by the Air Force for the proposed project, finding that the project is not consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program (CCMP).

## III. Applicable Legal Authorities:

Section 307 of the Coastal Zone Management Act (CZMA) 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 resource 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.*

## IV. Practicability:

The federal consistency regulations implementing the CZMA include the following provision:

*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 formally raised by the Air Force, the standard before the Commission is full consistency with the CCMP. The Commission does not believe the Air Force has presented any evidence in this case that compliance with the CCMP is prohibited based upon the requirements of existing law applicable to its operations.

**V. Findings and Declarations:**

The Commission finds and declares as follows:

**A. Environmentally Sensitive Habitat and Marine Resources:**

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

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

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

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 populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

Section 30250(a) provides:

*New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.*

The Air Force proposes up to 30 missile launches a year from five possible areas of the base; each location has a variety of sensitive plant and animal species which may be affected by the proposed project (Exhibit 12), including: the tidewater goby, California red-legged frog, Western snowy plover, California brown pelican, California least tern, and southwestern willow flycatcher (Exhibit 7). Since the proposed launches are to be conducted from the coastal areas of Vandenberg Air Force Base and over the Pacific Ocean, a number of marine mammals may also be affected by the proposed project, including the Northern fur seal, Northern elephant seal, Pacific harbor seal, California sea lion, and Southern sea otter. The potential for impacts to these species can come from noise impacts, water pollution from missile emissions, and from falling debris, as described below.

**Noise:** The startle effect from a launch is one of the main concerns with the proposed project, particularly for breeding and/or roosting species. Since launches are proposed to occur throughout the year, and given the variety of species with different breeding/roosting seasons, it is unlikely that Vandenberg Air Force Base can schedule launches to completely avoid all nesting and/or roosting seasons (Exhibit 9). The sudden launch noise can cause species to leave their nesting and breeding areas, leaving young vulnerable to trampling, predation, and abandonment.

**Debris:** A second concern for wildlife is the possibility of falling debris from the missile hitting a species. Missiles will be launched and intercepted over the Pacific Ocean. In its EA, the Air Force states that “[d]ebris impacts from normal launch activities are not expected to impact terrestrial or aquatic wildlife species.” Based on previous analysis of impacts from falling debris on gray whales, the Air Force concludes that the likelihood of a spent missile hitting an individual species is remote.

**Impacts from Emissions:** Missile launches can result in emissions of hydrochloric acid and aluminum to surface waters. EPA has determined the form of aluminum deposited from launches is nontoxic. The Air Force states that both the amount of aluminum deposited in surface waters and the amount of hydrochloric acid resulting from rain after a launch would be in small quantities and have little effect. Emissions to the air from launches is considered on page 12 below.

To address these concerns, the Air Force states in its Environmental Assessment (EA) that:

*the intermittent launches associated with the proposed project are not expected to substantially impact wildlife since the actual duration and frequency of the effect are expected to be low. ... TBM launches would be of a magnitude and frequency similar or less than that occurring at current active launch sites. ... Moreover, the use of multiple launch sites and mobile launchers would provide opportunities to reduce the likelihood of adverse effects during breeding and pupping seasons by allowing selection of other available sites, if necessary, thus avoiding certain species. In addition, personnel*

*would be instructed to refrain from approaching marine mammal haulout areas and avian nesting and roosting sites.*

Although the Air Force cannot commit to no launches from a site during a species' breeding or nesting period, from discussions with the Air Force, its intent is to plan launches from the site with the least environmental impact; consideration of sensitive species will be one factor in considering which launch site to use for each test. In addition, the Air Force has coordinated with both the National Marine Fisheries Service (NMFS) and with the U.S. Fish and Wildlife Service (F&WS) to address the potential impacts from noise. Based on both these agencies' requests, the Air Force has agreed to monitor the first launch of each missile type to determine the reaction from sensitive species present. This monitoring will help ensure that if impacts are significant from a launch, future mitigation can be considered. Based on monitoring that has been ongoing at Vandenberg AFB, the Air Force has stated to the Commission staff that the impacts from existing missile launches show a minimal impact; species are startled and leave their location, but return. According to the Air Force, monitoring during pinniped pupping season has also shown no effect from launches. This past monitoring has been with larger missiles. In addition, the Air Force has agreed to supply the Commission staff with copies of all monitoring reports associated with the program TBM Program. With the commitment to monitor the first launch of each missile type, and given that the proposed launches use missiles that are smaller than launches currently occurring on Vandenberg, NMFS has agreed with the Air Force that the expected impacts from the proposed project on species subject to its authority would be minimal.

The U.S. Fish and Wildlife Service has expressed a greater level of concern over species subject to its authority. The Fish and Wildlife Service has completed a biological opinion requesting additional mitigation measures. Some of these measures were addressed in the Air Force's EA, which committed to: (1) restricting launches from Launch Site 576-E (south of Point Purisma (Exhibits 2 & 11)) to a three-month period between October 1 through December 31; (2) avoiding overflights over Points Arguello and Pedernales, if possible; and (3) avoiding overflights over any islands off the coast of California. A complete list of the restrictions being required by F&WS, and which the Air Force has agreed to implement, is as follows [Biological Opinion 1-8-98-F-24, pp. 15-16]:

*The following reasonable and prudent measures are necessary and appropriate to minimize incidental take:*

- 1. The effects of the TBM launch program shall be monitored to ensure that unanticipated incidental take does not occur;*
- 2. the potential effects of launch emissions on the California red-legged frog shall be avoided whenever possible;*
- 3. the potential effects of night launches shall be minimized whenever possible; and*

4. *the effects on nesting listed birds shall be minimized by avoiding key nesting areas during the nesting season.*

*Terms and Conditions*

*In order to be exempt from the prohibitions of section 9 of the Act, the Air Force is responsible for compliance with the following terms and conditions, which implement the reasonable and prudent measures described above. Terms and conditions were contained in the U.S. Air Force's description of the proposed action and have been modified herein by the Service.*

1. *To implement reasonable and prudent measure 1, the following terms and conditions are established:*

a. *The Air Force shall ensure that the proponents of the TBM launch program develop, coordinate, and implement a monitoring program that is satisfactory to the Air Force, NMFS, and the Service.*

b. *The Air Force shall ensure that the proponents of the TBM launch program submit an annual report to the Air Force, NMFS, and Service by December 1 of each year. At a minimum, this report shall include launch location, missile type; trajectory and flight path(s); species that are within the predicted 85, 92, and 115 decibel noise contours for each launch location; the extent of exhaust fallout; time of day of launch(s); the resulting behavior of listed species within the identified noise contours and flight paths; observed adverse effects; recommendations on the effectiveness of monitoring; and recommended mitigation to offset adverse effects.*

*The Air Force shall ensure a commitment from TBM proponents to offset adverse effects to listed species identified through monitoring, in a manner approved by the Air Force and the Service.*

*The Air Force may propose, in writing, to reduce or suspend monitoring following the first year of full implementation of the TBM program, if agreed to in writing, by the Air Force, NMFS, and the Service.*

*To implement reasonable and prudent measure 2, the following term and condition is established:*

*The Air Force shall ensure that exhaust products from the TBM program are not directed at, or deflected to, wetland areas or suitable habitat occupied by any life stage of the California red-legged frog.*



*To implement reasonable and prudent measure 3, the following terms and conditions are established:*

*Night and low-level light (crepuscular) launches shall be avoided to the extent possible.*

*The Air Force shall develop a hierarchy of launch sites to be used for night and crepuscular launches that avoids, to the extent practicable, potential adverse effects to listed species. The launch hierarchy shall be submitted to NMFS and the Service for review and approval, at least 10 days prior to the first night or crepuscular launch.*

*To implement reasonable and prudent measure 4, the following terms and conditions are established:*

*The Air Force shall ensure that launches from 576-E are restricted to the period from October 1 to December 31 to avoid breeding seasons for western snowy plovers and California least terns at Purisima Point.*

*If possible launches from Groups C, D, and E shall avoid overflights of Points Arguello, Pedernales, and Purisima during the nesting seasons for the listed avian species known to the nest at these sites.*

*The avoidance of overflights at Points Arguello, Pedernales, and Purisima should, to the extent practicable, extend to the non-breeding seasons to reduce disturbance to roosting brown pelicans, as well as other listed avian species. The Air Force and the Service shall mutually agree, in advance, what constitutes an overflight by TBM missiles for Points Arguello, Pedernales, and Purisima.*

In addition to these restrictions, the Fish and Wildlife Service also recommended (as opposed to required) that the Air Force avoid the use of launch site 576E altogether. This recommendation was based on the fact that although the Service did not believe it could base a "jeopardy" opinion on use of the site for the allowed 3-month period, it nevertheless was concerned about cumulative effects on wintering snowy plovers, pelicans (especially nighttime use), and sea otters (especially where rearing pups are present). Based in part on this recommendation the Commission staff requested that the Air Force agree to remove this site from the available alternative launch sites, or agree to submit separate consistency or negative determinations prior to using the site. The Air Force did not agree to either of these measures, but instead committed to the following restriction regarding use of this site:

*... the site known as 576E will only be utilized by TMD during the 3-month period acceptable to Fish and Wildlife Service (see Biological Opinion) following prior coordination with California Coastal Commission staff. Information will be provided supporting this decision as being the least damaging alternative consistent with mission requirements. This information will consider other available launch sites, will describe*

*habitat impacts that would occur at Site 576E, and will explain why site 576E must be used if other sites are available. In addition, the term "prior coordination" means that the CCC staff will be notified at least seven days before the launch.*

Also, at the request of the Commission staff, the Air Force also clarified one of the other restrictions in the biological opinion, stating:

*First, TMD [i.e., the Air Force] will conduct night launches only when necessitated by unusual circumstances or mission requirements. Whenever possible, prior notification of a night launch will be provided California Coastal Commission (CCC) staff.*

Given the above commitments to address habitat concerns, the primary issue before the Commission is whether Site 576E should be eliminated from the program rather than restricted to a 3-month launch window, given the potential residual and cumulative impacts on sensitive species from use of that site. Site 576E is the most sensitive of the sites proposed for use. Use of this site, even when limited to a 3-month period, still entails adverse effects on wintering snowy plovers, night-roosting pelicans, and sea otters, to the extent that the risk of these species abandoning the area remains.

The Commission acknowledges that the proposal entails much smaller rockets than traditionally launched from Vandenberg Air Force Base. However, it is not only the launches themselves that can disturb sensitive species but associated activities including human intrusion and helicopter noise. The Commission also acknowledges that Fish and Wildlife Service has made a distinction between measures that are necessary to protect the species from jeopardy and measures that it considers discretionary and would assist in the recovery of the species. Despite this distinction, the Commission does not believe use of Site 576E for this program can be found consistent with the Coastal Act, given: (1) the potential cumulative impacts, (2) the open-ended, multi-year duration of the program, (3) the relative significance of the Purisima Point area near Site 576E for the species that could be affected by launches at this site (i.e., wintering snowy plovers, nighttime brown pelican roosting, and pupping sea otters) and (4) the fact that numerous alternative launch sites are available for the program other than Site 576E (14 available sites on north Vandenberg and 3 available sites on south Vandenberg). In addition the Air Force has made no compelling argument that use of Site 576E for the program is necessary. For all these reasons the Commission finds use of this site inconsistent with the requirement of Section 30240 of the Act that "Development in areas adjacent to environmentally sensitive habitat ... 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." Moreover, given the cumulative impact concerns posed by for use of this site combined with impacts from other launch programs in the Purisima Point vicinity, the Commission also finds use of this site inconsistent with the requirement of Section 30250 of the Act that "New ... development... shall be located ... where it will not have significant adverse effects, either individually or

cumulatively, on coastal resources.” The Commission therefore concludes that, even with the commitments agreed to by the Air Force, the project is not consistent with the environmentally sensitive habitat and cumulative impacts policies (Sections 30240 and 30250) of the Coastal Act.

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

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

- (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,*
- (2) adequate access exists nearby, or,*
- (3) agriculture would be adversely affected.*

Sections 30234 and 30234.5 of the Coastal Act protect commercial and recreational fishing. Section 30234.5 states:

*The economic, commercial, and recreational importance of fishing activities shall be recognized and protected.*

Public access opportunities along the Santa Barbara County coast from Gaviotta north are highly limited. The shoreline adjacent to and along Vandenberg Air Force Base provides some of the few coastal access points between Gaviota and Point Sal. Access points include Point Sal State Park, Seal Beach, Ocean Beach County Park, Wall Beach, and Jalama Beach County Park (Exhibits 7-8). Under an agreement with Santa Barbara County and Vandenberg Air Force Base, these beaches can be closed not more than 48 hours before a missile launch. These closures occur an estimated 15 times a year, with, at most, two of the beaches closed simultaneously. The Air Force allows limited weekend and holiday access to Seal Beach for surf fishing. The state and county beaches are also popular for surf fishing. In addition, recreational trapping and divers operate in the shallower waters near the shore and commercial fishing activities occur off the coast of Vandenberg from October to January.

The Air Force has committed to preventing any beach closures under the proposed project. Therefore, public access to the beaches on and adjacent to Vandenberg Air Force Base will not be affected by the project. However, the project may still affect fishing and diving opportunities. Areas of the Pacific Ocean adjacent to the launch pad could be cleared up to five times every two months. This clearance would be required for approximately one hour. The Air Force has committed to providing adequate prior notice to all fishing interests, and the Air Force's EA notes that with advance notice, fishing boats can schedule trips to avoid area. Thus, recreational

fishing impacts would be minor and temporary, and the Commission notes that in reviewing past launch activities and programs, the Commission's access and recreation concerns have been focused on minimizing beach closures. The Commission concludes that with the avoidance of any beach closures the proposed program is consistent with the public access and recreation policies (Sections 30210-30212) and the commercial and recreational fishing policies (Sections 30234 and 30234.5) of the Coastal Act.

**C. Air Quality:** Section 30253 of the Coastal Act states, in part, that new development shall "be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development."

Section 30414 of the Coastal Act states:

*The provisions of this division do not authorize the commission or any local government to establish any ambient air quality standard or emission standard, air pollution control program or facility, or to modify any ambient air quality standard, emission standard, or air pollution control program of facility which has been established by the state board or by an air pollution control district.*

Vandenberg Air Force Base is in a nonattainment area for ozone and inhalable particulate matter. The EA for the proposed project states:

*Launch preparation and support activities could potentially have an impact on air quality at Vandenberg AFB, and would likely require air quality permits and associated mandated offsets. All emissions would be regulated in accordance with the two MOAs between Vandenberg AFB and the SBCAPCD [Santa Barbara County Air Pollution Control District].*

The Air Force has determined that emissions caused by the proposed project are below the mandated de minimis thresholds, and has therefore issued a finding of presumed conformity with the state implementation plan with regards to air quality. The Air Force states in its EA that its analysis of impacts to air quality was coordinated with SBCAPCD.

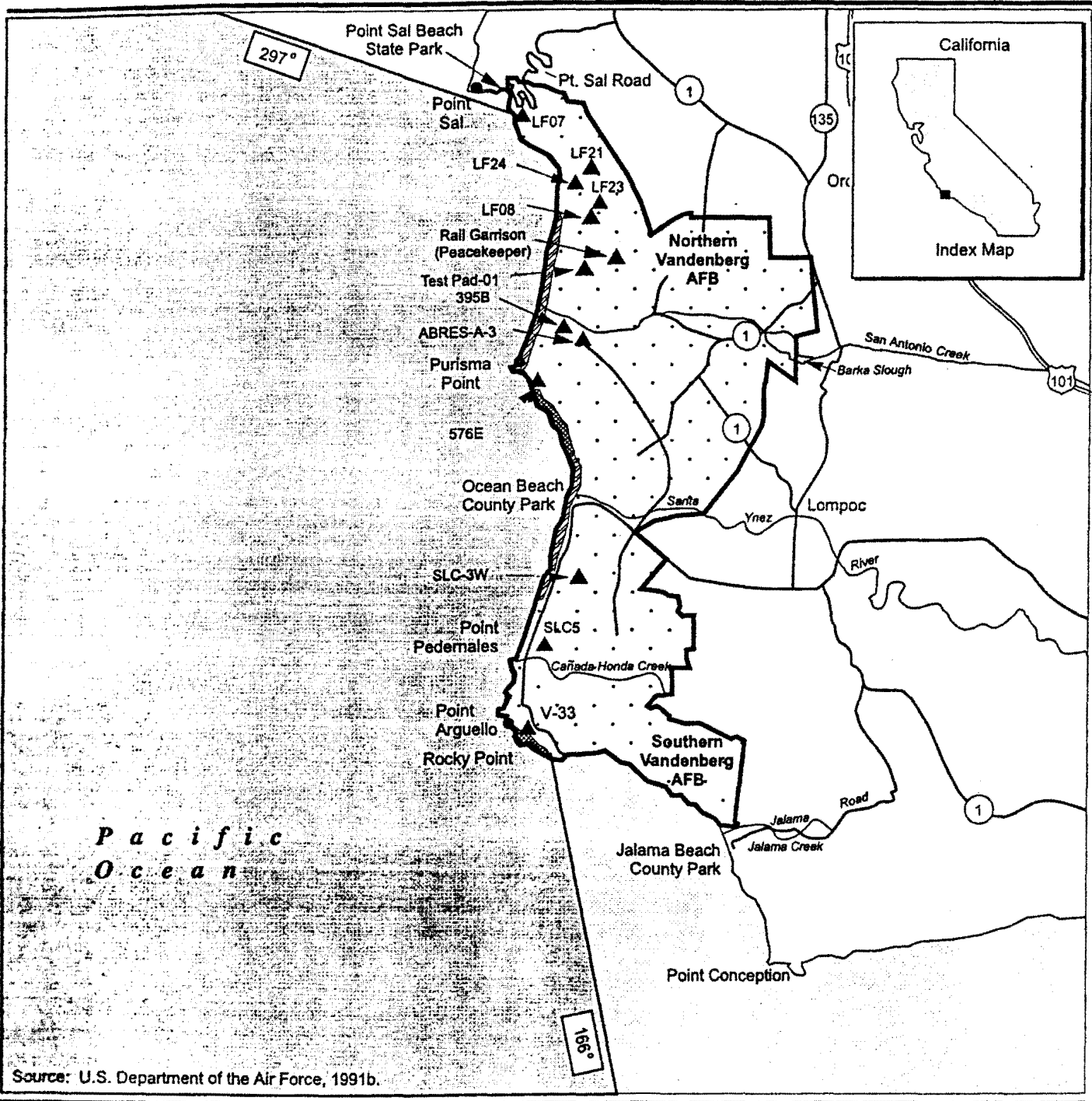
Section 30414 of the Coastal Act prohibits the Commission from establishing any standards for air quality other than those requirements imposed by the Air District. In complying with the standards of the Clean Air Act, the Air Force will also comply with the Coastal Act. Based on the Air Force's conclusions regarding emissions, the Commission finds the proposed project consistent with Section 30253 of the Coastal Act.

**VI. 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.*






As discussed above (pp. 5-11), the Commission has found that the project as proposed is inconsistent with the environmentally sensitive habitat and cumulative impacts policies of the California Coastal Management Program (CCMP) (Coastal Act Sections 30240 and 30250). Feasible alternatives are available which would enable the project to be carried out in a manner consistent with these policies. The Commission finds that the Air Force has 17 feasible alternative sites available for use by the TBM program, the use of which would avoid the habitat effects described on pages 7-11 and which would enable the program to be carried out in a manner consistent with the Coastal Act. If the Air Force would resubmit the consistency determination with this site removed from consideration, the Commission could find such a revised program consistent with the CCMP.

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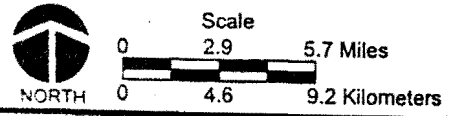
Source: U.S. Department of the Air Force, 1991b.

**EXPLANATION**


-  Nesting Location of California Least Tern/Western Snowy Plover
-  Haulout Location of California Sea Lion, Northern Elephant Seal, and Harbor Seal
-  Launch Trajectory Azimuth
-  Angle of Azimuth
-  Candidate Launch Site

**Combined Target Launch Azimuths, Vandenberg, AFB**

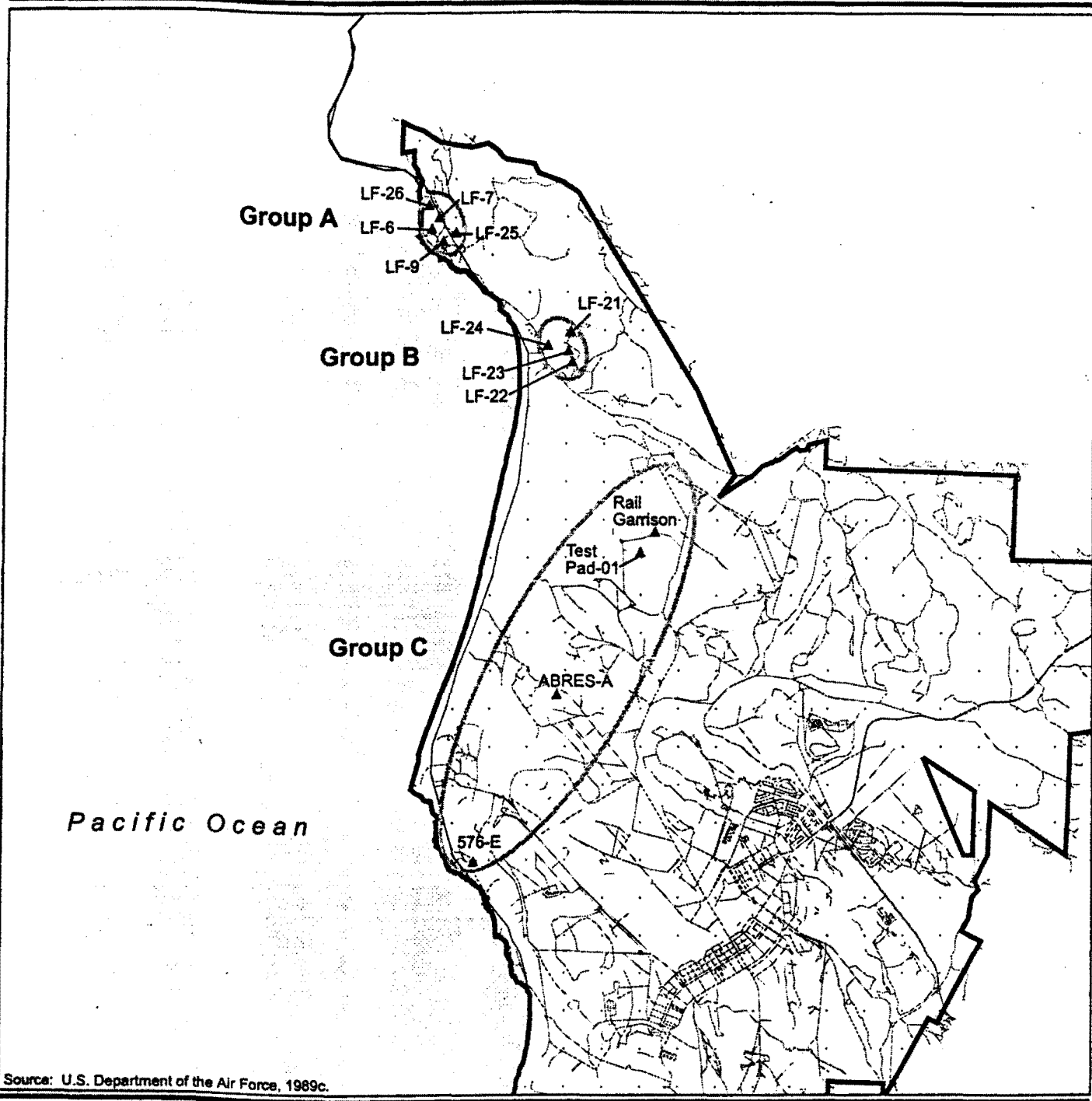
Western Range Area



Figure

EXHIBIT NO.	1
APPLICATION NO.	
	0-5-88
 California Coastal Commission	

TBM Targets EA

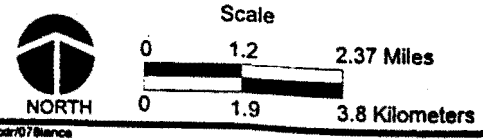


Source: U.S. Department of the Air Force, 1989c.

**EXPLANATION**

▲ Candidate Launch Site

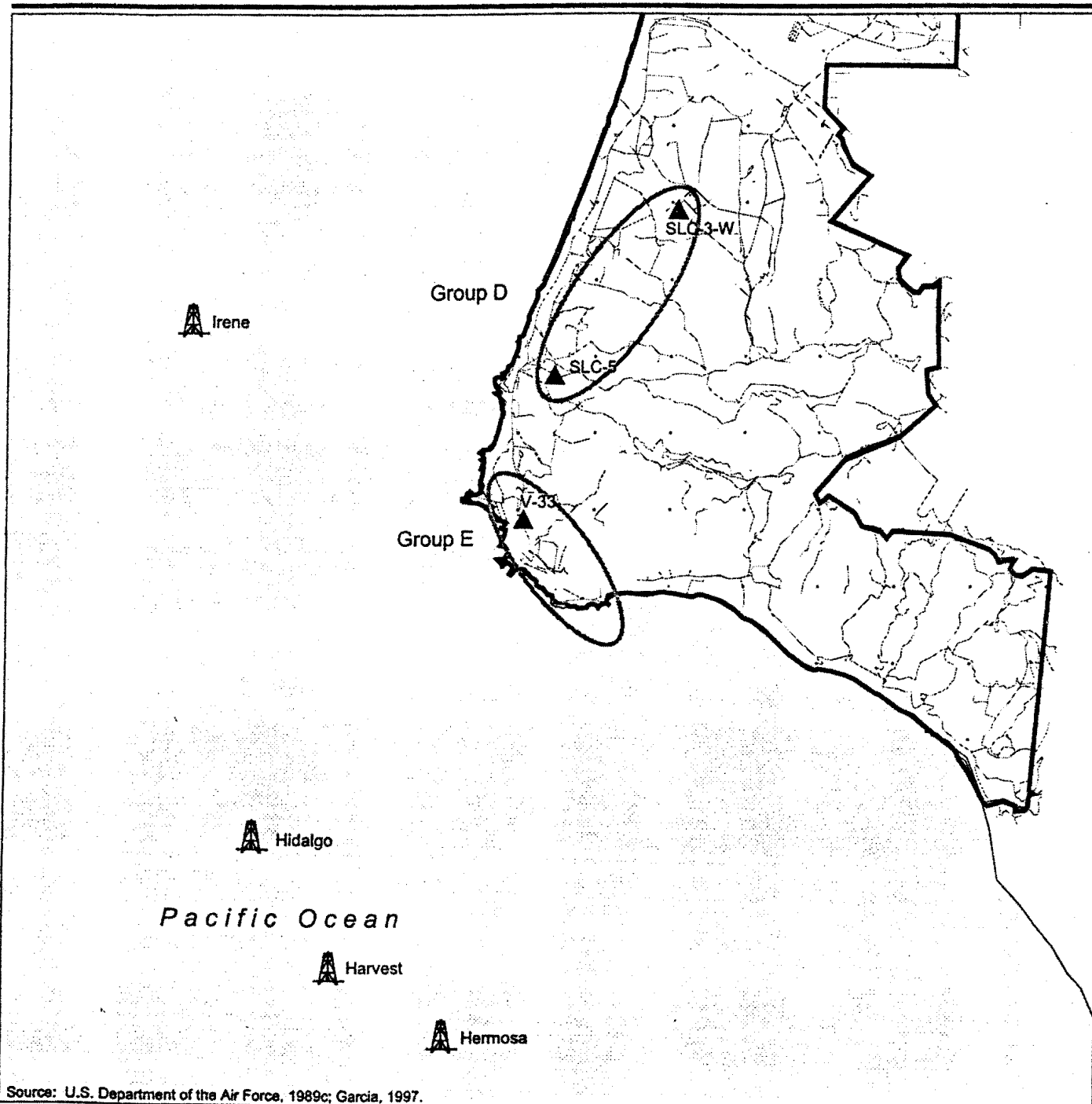
**Target Launch Site Groups**



Northern Va

**Figure 2-**

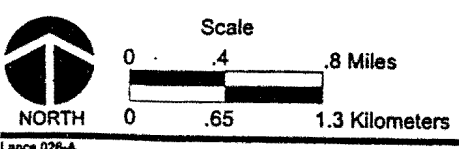
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APPLICATION NO.	



**EXPLANATION**

- ▲ Candidate Launch Site
- ▲ Off-shore Oil Rig Platform

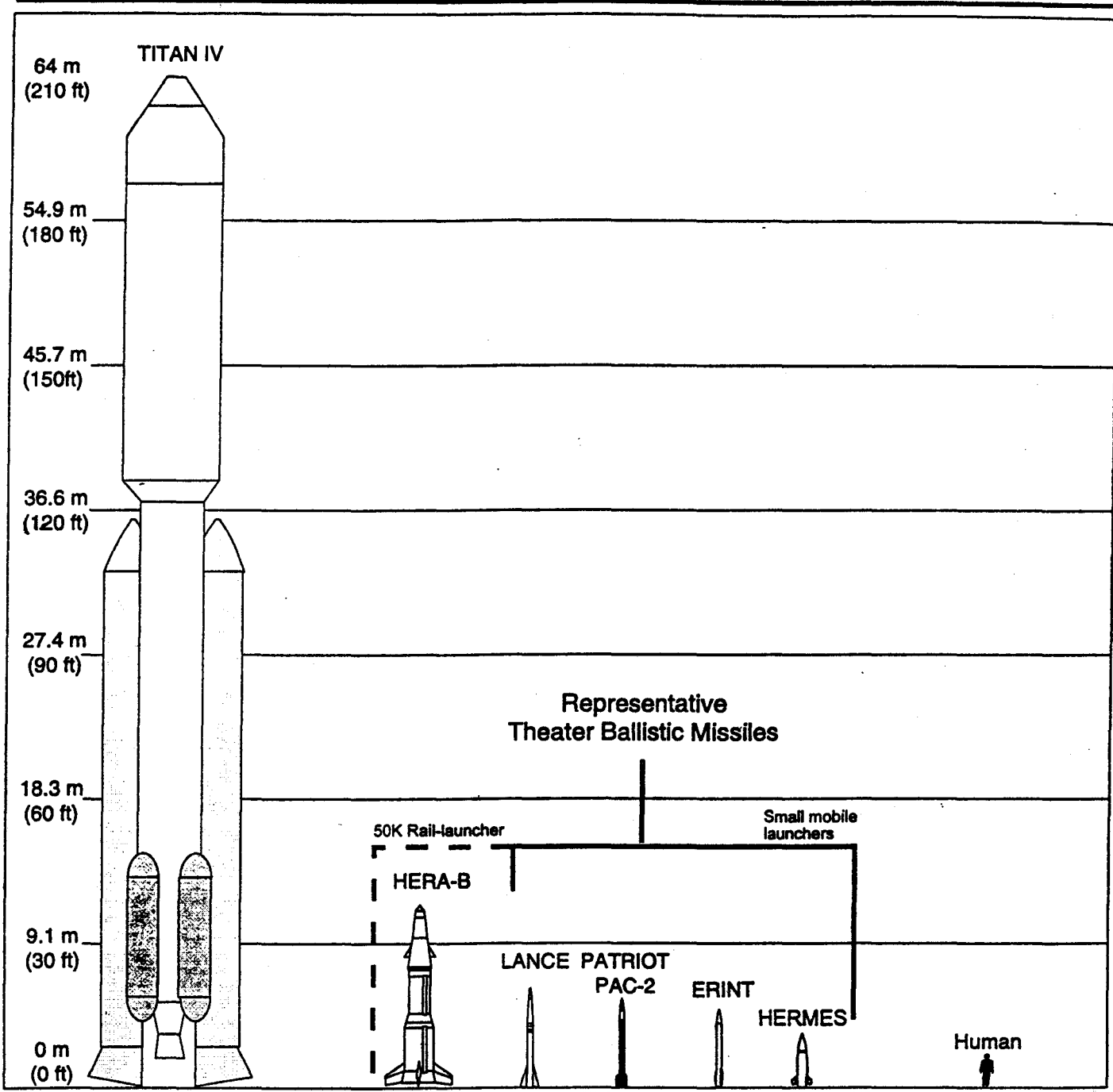
**Target Launch Site Groups**



TBM Targets EA

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	APPLICATION NO.
	California Coastal Commission





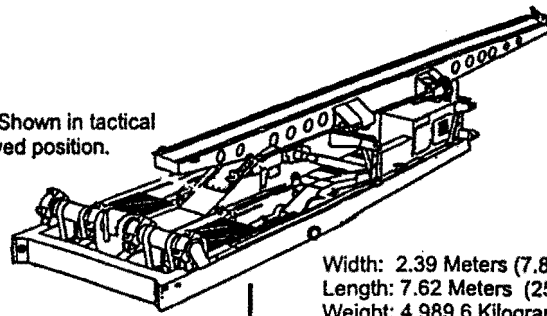
Source: U.S. Army Space and Strategic Defense Command, Test and Evaluation Office, 1995.

**Theater Ballistic Missile Target Vehicle Comparison**

Figure :

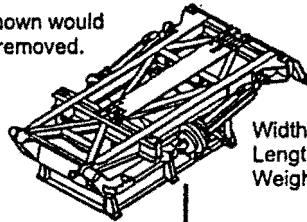
EXHIBIT NO.	4
APPLICATION NO.	
	CD-5-12
California Coastal Commission	

Launcher Portion - Shown in tactical configuration. Stowed position.



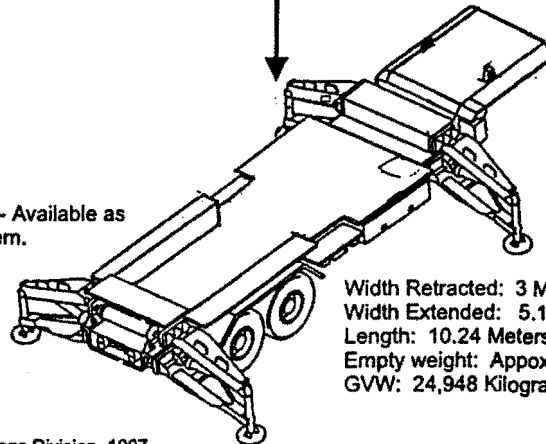
Width: 2.39 Meters (7.83 Feet)  
Length: 7.62 Meters (25 Feet)  
Weight: 4,989.6 Kilograms (11,000 Pounds)  
Capacity: 5,400-6,800 Kilograms (12,000-15,000 Pounds)

Azimuth Turntable - Unit shown would have the elevation portion removed.



Width: 2.44 Meters (8 Feet)  
Length: 4.27 Meters (14 Feet)  
Weight: 3,175 Kilograms (7,000 Pounds)

All terrain carrier - Available as standard stock item.



Width Retracted: 3 Meters (9.83 Feet)  
Width Extended: 5.16 Meters (16.92 Feet)  
Length: 10.24 Meters (33.6 Feet)  
Empty weight: Appox. 10,886 Kilograms (24,000 Pounds)  
GVW: 24,948 Kilograms (55,000 Pounds)

Source: Naval Air Warfare Center - Weapons Division, 1997.

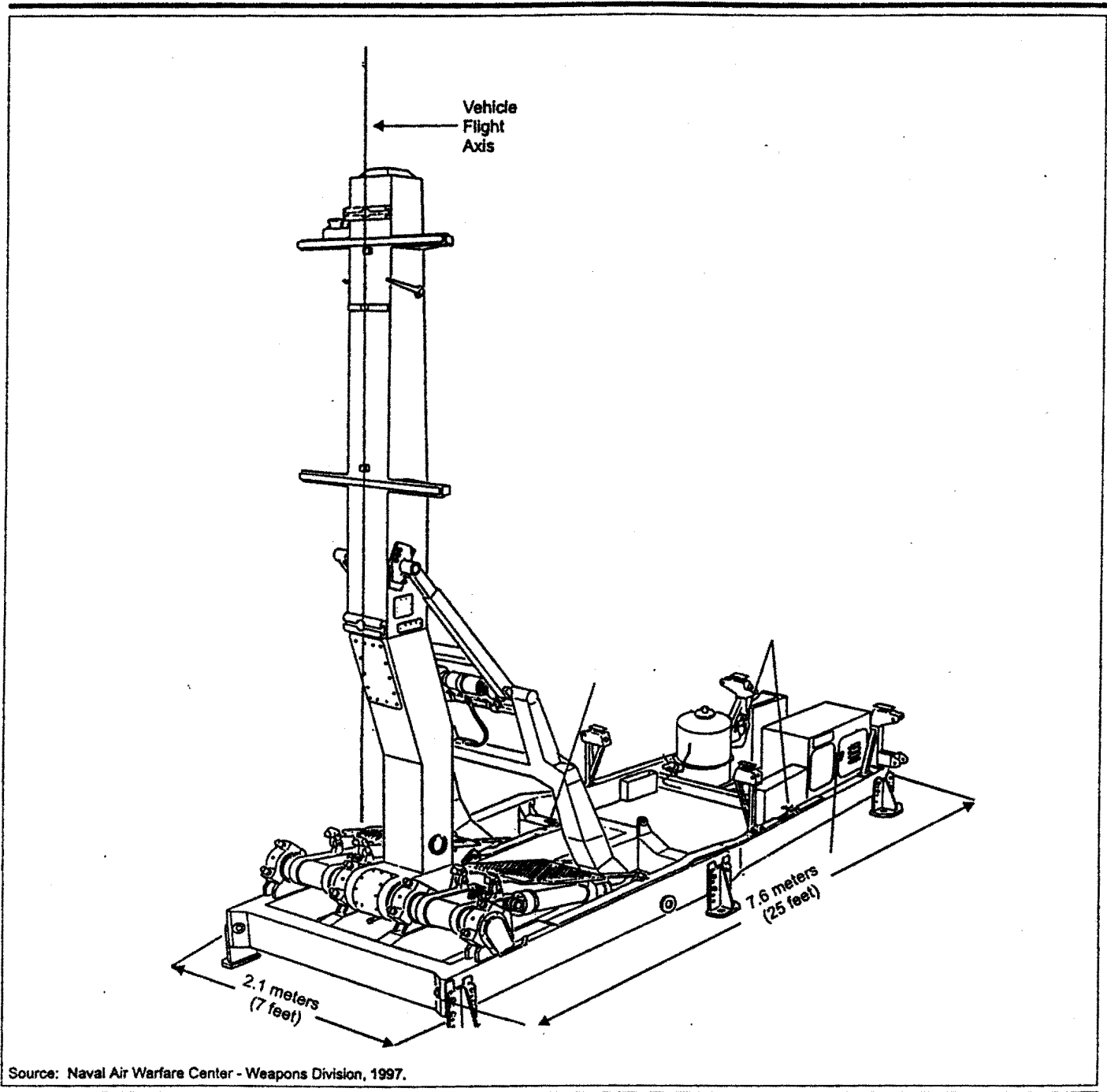
## Typical Mobile Launcher Components

Figure

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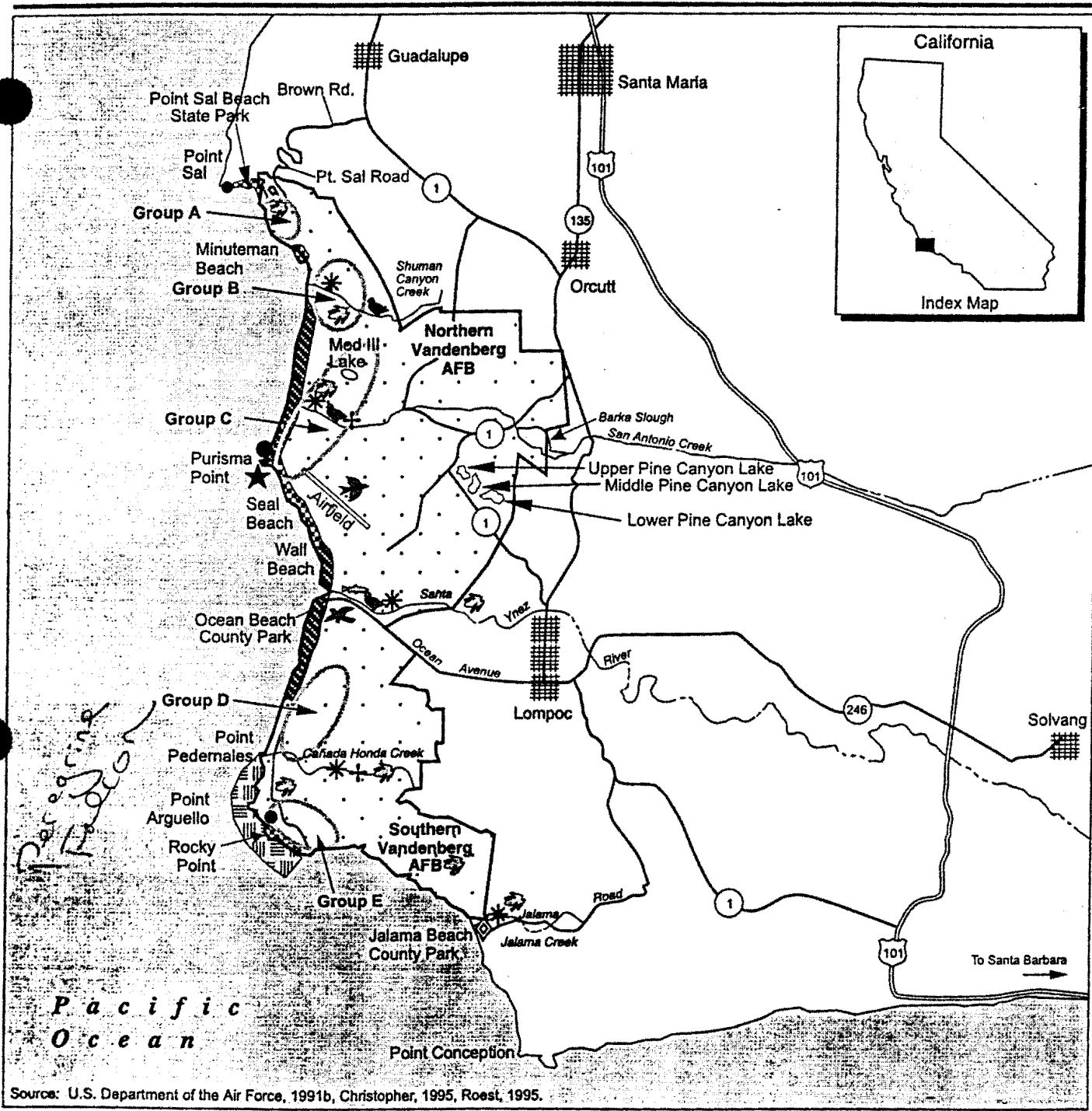
CD-5-1



**Representative Mobile Launcher without Flatbed Trailer**

Figure

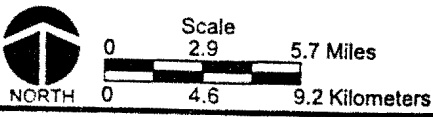
EXHIBIT NO.
APPLICATION NO.
<i>[Handwritten Signature]</i>
California Coastal Commission



Source: U.S. Department of the Air Force, 1991b, Christopher, 1995, Roest, 1995.

**EXPLANATION**

- Nesting Location of California Least Tern/ Western Snowy Plover
- Haulout Location of California Sea Lion, Northern Elephant Seal, and Pacific Harbor Seal
- Marine Ecological Reserve
- Roosting Location of California Brown Pelican
- Southern Sea Otters
- Launch Site Areas
- Tidewater Goby
- Unarmored Threespined Stickleback
- Steelhead Trout
- Mountain Plover (Winters Only)
- Southwestern Willow Flycatcher
- Snowy Plover (Winters Only)
- California Least Tern (CLT) Foraging Areas
- California Red-legged Frog (Wide Distribution Also Includes Ponds and Vernal Pools)
- Steelhead Trout
- Mountain Plover (Winters Only)
- Southwestern Willow Flycatcher
- Snowy Plover (Winters Only)



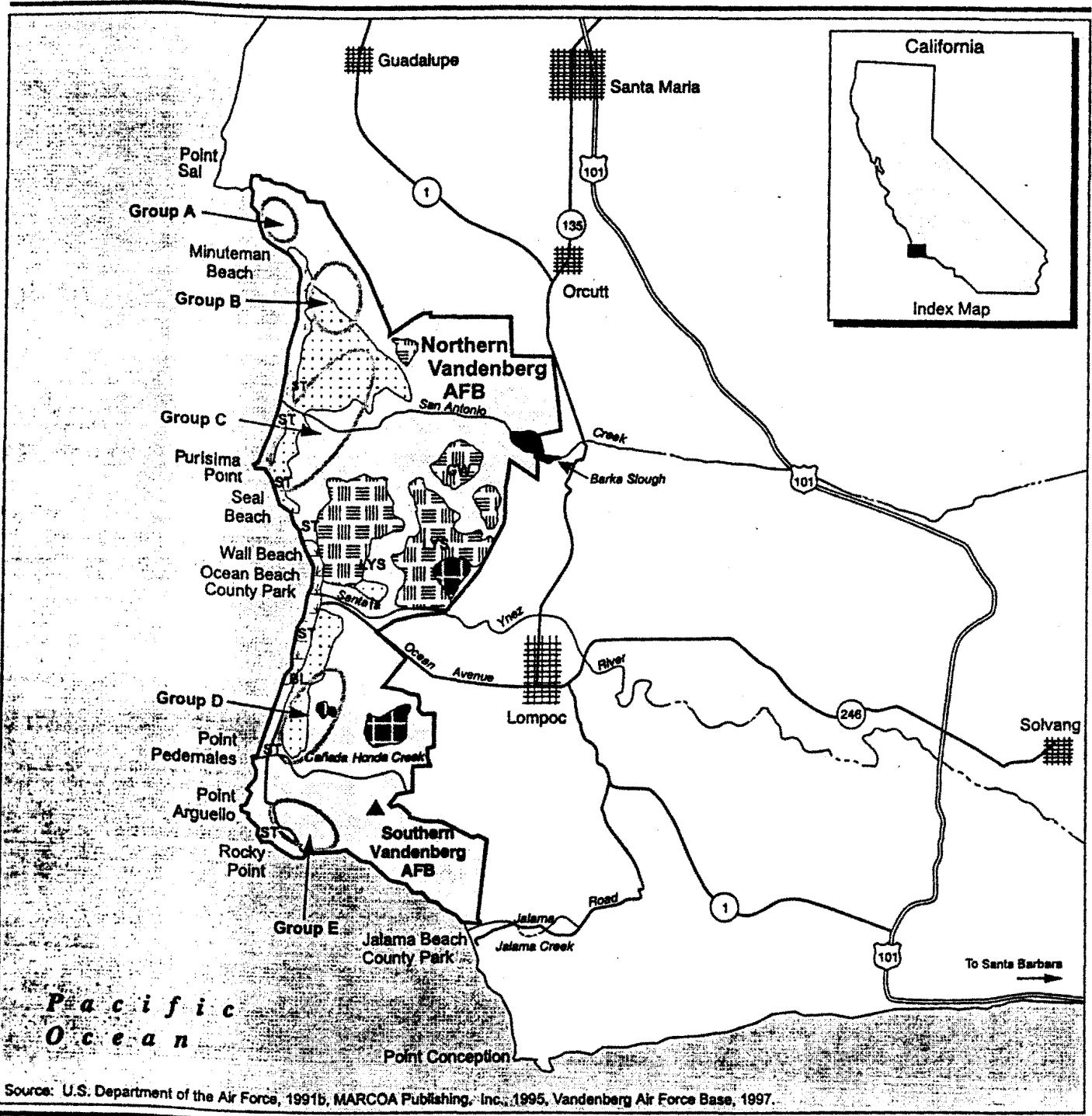
**Sensitive Habitat for Listed Faunal Species on Vandenberg AFB**

Western Range Candidate Test Area

Fi: EXHIBIT NO. 11

APPLICATION NO.

California Coastal Commission

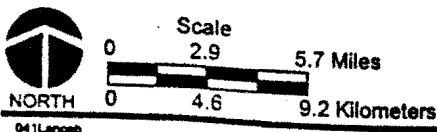


Source: U.S. Department of the Air Force, 1991b, MARCOA Publishing, Inc., 1995, Vandenberg Air Force Base, 1997.

**EXPLANATION**

- |  |                       |  |                                  |
|--|-----------------------|--|----------------------------------|
|  | Central Foreduces     |  | Other Vegetation/Cantonment Area |
|  | Coastal Dune Scrub    |  | Tanbark-Oak Forest               |
|  | Burton Mesa Chapparal |  | BL Beach Layla                   |
|  | Bishop Pine Forest    |  | LYS Lompoc Yerba Santa           |
|  | Barka Slough          |  | ST Surf Thistle                  |
|  |                       |  | GW Gambel's Watercress           |

**Sensitive Vegetation Communities and Sensitive Plant Species, Vandenberg AFB**



Western Range Area

Figure 3-

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California Coastal Commission

the Air Force, 1990a), and has been noted around the San Antonio (U.S. Department of the Air Force, 1995), but the raptor is not considered a common sight in the area.

**Table 3-4: Pupping and Breeding Seasons For Sensitive Species**

	Species	Pupping/Breeding Season	Applicable Launch Sites
<i>Marine Mammals</i>			
1	California sea lion	Mid-May-Late June	Group A, Group C, Group D, Group E
2	Guadalupe fur seal	N/A	Group A, Group C, Group D, Group E
3	Northern elephant seal	Late December-Mid-February	Group A, Group C, Group D, Group E
4	Northern fur seal	Late May-July	Group A, Group C, Group D, Group E
5	Pacific harbor seal	February-May	Group A, Group C, Group D, Group E
6 *	Southern sea otter	Peak pupping: January-March Peak breeding: July-October	Group C
7	Steller sea lion	Early June-Early July	Group A, Group C, Group D, Group E
<i>Birds</i>			
8 †	American peregrine falcon	mid-February-July	Group D, Group E
9	California brown pelican	February-April	Group A, Group B, Group C, Group D, Group E
10	California least tern	mid-April-August	Group B, Group C, Group D
11	Southwestern willow flycatcher	mid-May-mid-July	Group D
12	Western snowy plover	March-September	Group B, Group C, Group D

Source: Zane Publishing, Inc., 1995; Vandenberg Air Force Base, 1996a.


Note: The flycatcher is known only along the Santa Ynez River, where its only documented recent nesting has occurred near the 13<sup>th</sup> Street Bridge and off-base.

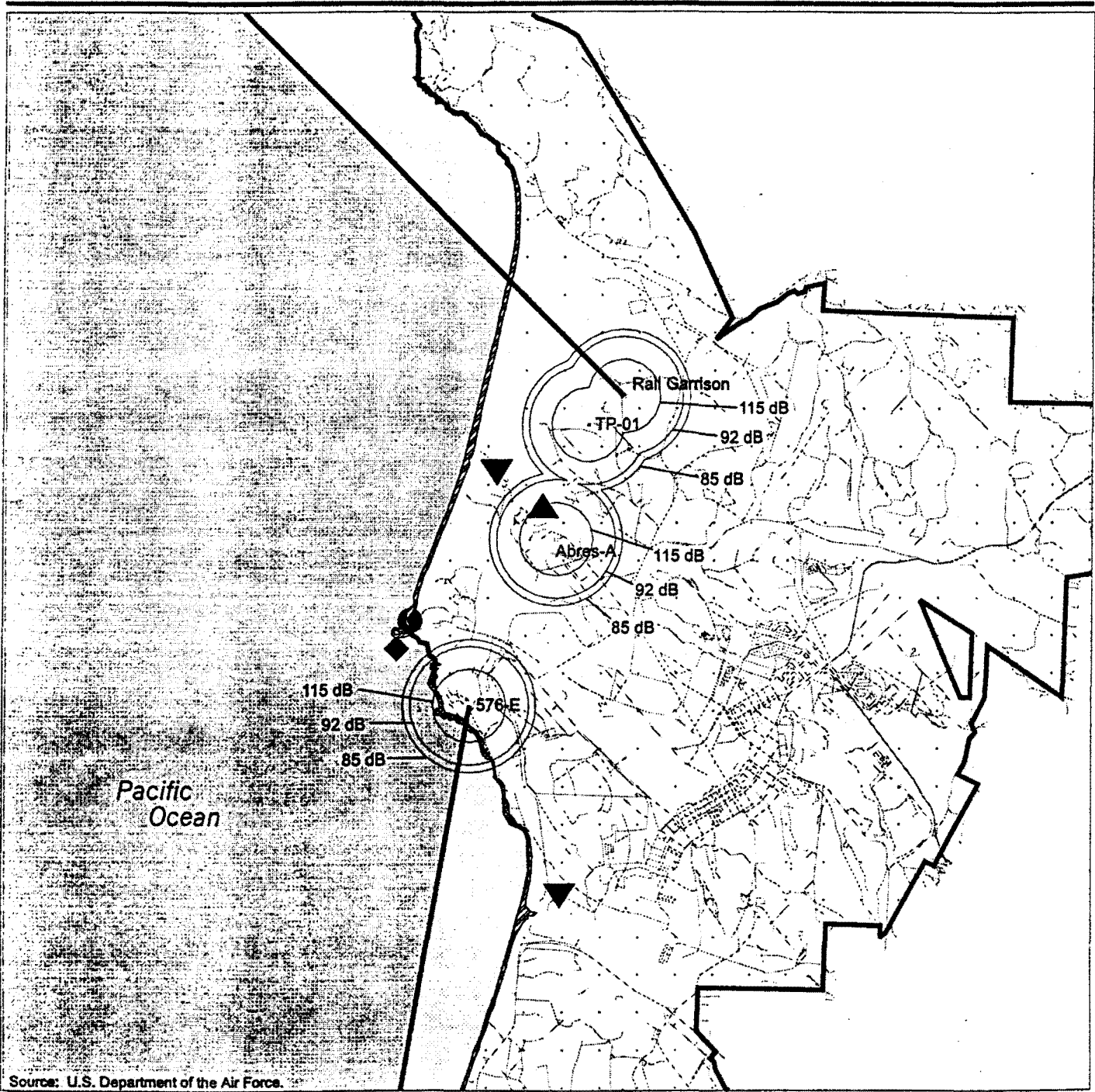
A resident population of Federally threatened Southern sea otters has been observed off Purisima Point, typically foraging and rafting in kelp beds; however, semi-migratory individuals may be found all along the coastline. Possibly indicative of a habitat expansion (U.S. Department of the Air Force, 1992), this colony has been confirmed as a small breeding population (U.S. Department of the Air Force, 1995). The kelp beds are located about 1.16 kilometers (3,800 feet) west of the 576-E site (U.S. Department of the Air Force, 1993a), which abuts a haulout location for Pacific harbor seals and, rarely, California sea lions and northern elephant seals.

### South Vandenberg Air Force Base

A general description of vegetation and wildlife present on Vandenberg AFB is given in section 3.2.1. On the whole, South Vandenberg is much less developed than the northern areas and thus more conducive to wildlife diversity. Recently, breeding of the American peregrine falcon has been documented in the area, where preferred aerie sites are protected, typically seaward-facing, coastal cliff ledges. However, the species is not represented in figure 3-2 due to a request by the USFWS (Vandenberg Air Force Base, 1993; U.S. Department of the Interior, 1994).

The State of California has designated a 4.8-kilometer (3-mile) area of South as a marine ecological reserve, but this was not intended as a restriction against operations. Rather, a Memorandum of Agreement (MOA) between the state

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APPLICATION NO.	
	



**EXPLANATION**



Nesting Location of California Least Tern/Western Snowy Plover



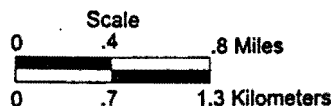
Haulout Location of California Sea Lion, Northern Elephant Seal, and Harbor Seal



Launch Trajectory Azimuth



NORTH



Sea Otters



Roosting Location of California Brown Pelican



Tidewater Goby



Unarmored Threespined Stickleback



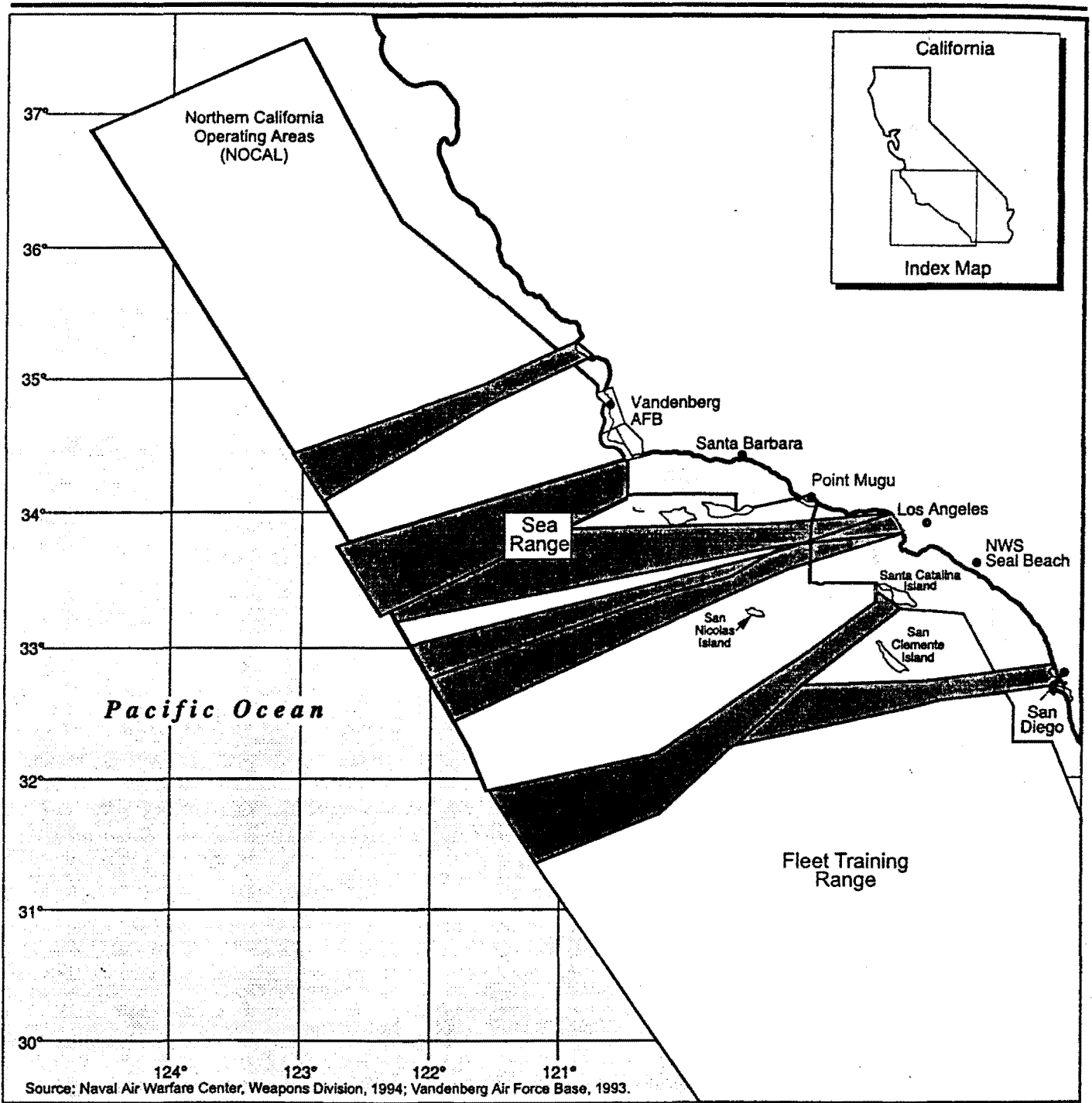
Noise Contours

**Maximum Noise Levels for Combined Launches of Lance Missiles, Group C (dB re 20  $\mu$ Pa)**

Vandenberg AFB



Figure

EXHIBIT NO.	10
APPLICATION NO.	
California Coastal Commission	



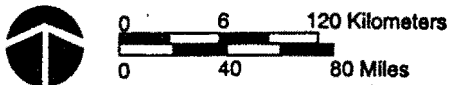
Source: Naval Air Warfare Center, Weapons Division, 1994; Vandenberg Air Force Base, 1993.

**EXPLANATION**

-  Test Range Area
-  Air Traffic Corridors

**Western Range Area Location**


Air Traffic Corridors,  
Vandenberg AFB



**Figure 1**

lance024

TBM Targets EA

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 California Coastal Commission	



**CALIFORNIA COASTAL COMMISSION**

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



Species found at each launch site

**Launch Sites A and B:**

tidewater goby  
 Ca red-legged frog  
 Western snowy plover  
 Ca brown pelican  
 Ca least tern  
 Northern fur seal  
 Northern elephant seal  
 Pacific harbor seal  
 Ca sea lion  
 surf thistle

**Launch Site C:**

tidewater goby  
 unarmored threespine stickleback  
 Ca red-legged frog  
 Western snowy plover  
 mountain plover  
 Ca brown pelican  
 Ca least tern  
 Northern fur seal  
 Northern elephant seal  
 Pacific harbor seal  
 Ca sea lion  
 Southern sea otter  
 surf thistle  
 Lompoc yerba santa  
 Gambel's watercress

**Launch Site D:**

tidewater goby  
 unarmored threespine stickleback  
 Ca red-legged frog  
 Western snowy plover  
 mountain plover  
 Ca brown pelican  
 Ca least tern  
 Northern fur seal  
 Northern elephant seal  
 Pacific harbor seal  
 Ca sea lion  
 Southern sea otter  
 surf thistle  
 Lompoc yerba santa  
 Gambel's watercress

Western snowy plover  
 mountain plover  
 southwestern willow flycatcher  
 back eagle  
 Ca brown pelican  
 Ca least tern  
 Northern fur seal  
 Northern elephant seal  
 Pacific harbor seal  
 Ca sea lion  
 Southern sea otter  
 surf thistle

**Launch Site E:**

tidewater goby  
 unarmored threespine stickleback  
 steelhead trout  
 Ca red-legged frog

EXHIBIT NO. 12
APPLICATION NO.
CD-6-98