

CALIFORNIA COASTAL COMMISSION

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**DRAFT EXECUTIVE DIRECTOR
CONCURRENCE LETTER**

May 20, 1999

Vivian Goo
Deputy Public Works Officer
Naval Air Weapons Station
ATTN: James Danza
1000 23rd Avenue
Port Hueneme, CA 93043-4301

Subject: Negative Determination ND-2-99, U.S. Navy, parking lot improvements and road extension partly within jurisdictional wetlands at Naval Air Weapons Station, Point Mugu, Ventura County.

Dear Ms. Goo:

The Coastal Commission staff has received the above-referenced negative determination for the Navy's proposed parking and road improvements at the Naval Air Weapons Station (NAWS) at Point Mugu (Exhibits 1-4). The project site is located approximately one-third mile inland of the coastal zone boundary in a developed area of the NAWS and includes the following elements: (1) a 0.6-acre paved road extension connecting two paved parking lots at the NAWS's recreation fields and community support buildings; (2) a 1.06-acre gravel community support building parking lot; and (3) a 0.7-acre gravel recreation field parking lot. The two proposed parking lots are sites which are currently used for parking by Navy personnel when recreation and community events are scheduled at the adjacent facilities; they are not used on a continuous, daily basis. The 2.36 acres proposed for development includes 0.99 acres of upland and 1.37 acres of jurisdictional wetlands as delineated in 1994 by the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency (Exhibit 4).

The Navy stated in its submittal that portions of the proposed project were completed in early 1998 prior to review by the Coastal Commission and Corps of Engineers (Exhibit 5). This activity included: (1) filling 0.03 acres in the proposed recreation area parking lot with 6 inches of gravel (approximately 25 cubic yards) to improve an unofficial road which connected two existing paved parking lots; and (2) blading 0.91 acres at the community support parking area to smooth out ruts and improve parking conditions; no fill was added but approximately 150 cubic yards of soil was shifted and spread across the site. The Navy stated that by March 1999, and after the effects of winter rainfall, all traces of blading and spreading were gone and the site had returned to its pre-disturbance condition.

The Navy reports that parking in the area of the community support facilities (Community Center, Chapel, and Theatre) and the recreation fields has been inadequate for several years. As a result, Navy personnel using these sites have been parking their cars in two adjacent degraded wetland areas which are now proposed to be developed as gravel parking lots. As a part of its submittal, the Navy examined alternative parking areas and determined that potential alternatives are either located in similar degraded and isolated wetland habitat, too far from the recreation fields and community buildings they are to serve, in active antenna fields, or immediately adjacent to residential areas.

The Navy's ecologist reports in the negative determination that the project site is a severely degraded, isolated salt panne habitat type, surrounded by a sparse, low-growing pickleweed habitat type, and is dominated by non-native grasses. The site is level, drains poorly, exhibits extremely limited natural resource values, and does not support any federal or state listed species or species of concern. The degraded wetlands at and adjacent to the project site are not tidally influenced, are located 1,600 feet from the nearest water conveyance system, and lack water except during and after rainfall. These wetlands are not feasibly restorable due to their isolation and distance from tidal waters; in addition, they are located in a developed area of the NAWs (Exhibit 2). The gravel base to be spread across the two areas currently used for parking would allow rainfall to continue to percolate into the ground and would not generate off-site runoff or adverse water quality effects on the coastal zone.

Although the proposed project is located inland of and will not affect the coastal zone, the Navy is nevertheless mitigating the wetland fill associated with the project in conjunction with obtaining a Corps of Engineers Pre-Discharge Notification under Nationwide Permit Number 26 (Headwaters and Isolated Waters Discharges). In 1997 the Navy completed construction of the Point Mugu Laguna Road Wetland Restoration Project, which restored and enhanced approximately 35 acres of tidal wetlands at the former Point Mugu Public Works yard, an upland site north of Mugu Lagoon (Exhibit 2). The project returned tidal flows to the site, created mudflat, creek, and salt marsh habitat, and developed two nesting islands for the endangered California least tern; the habitats are functioning and the Navy is monitoring the site using accepted wetland restoration success criteria.

While the Navy has not yet established a formal wetland mitigation bank for this site under the Corps of Engineers' mitigation bank guidelines, the Navy is coordinating with the Corps regarding placing this restoration site into the Corps' mitigation bank program. In the interim,

the NAWS's Public Works Planning Branch maintains a record of Navy development projects at the Point Mugu complex utilizing the mitigation credits established by the Laguna Road Restoration Project. In the subject proposal, the Navy proposes to mitigate the 0.94 acres of project wetlands disturbed in 1998 at a ratio of 5:1, thereby using 4.7 acres of mitigation credits from the Laguna Road Restoration Project, and will mitigate the remaining 0.43 acres of project wetlands at a ratio of 3:1, using 1.29 acres of mitigation credits. The Laguna Road Restoration Project contains sufficient credits to accommodate the six acres of mitigation credits to be used by the subject parking and road project.

The proposed development is similar to wetland alteration outlined in a 1996 negative determination submitted by the Navy for recreational and residential improvements at the NAWS. In ND-40-96, the Navy proposed filling 3.03 acres of degraded and isolated wetlands at a site outside the coastal zone approximately one-third mile further inland from the parking areas proposed in the subject negative determination. The Executive Director concurred with ND-40-96 after determining that the wetland was not restorable due to its degraded condition, its tidal and hydrologic isolation, the surrounding intensity of development, because it did not support coastal zone species such as birds, fish, or other marine organisms that migrate through the coastal zone, and because mitigation through the creation of new tidal wetlands was incorporated into the project.

The Executive Director believes it is appropriate to concur with the subject negative determination for the same reasons. The Commission staff agrees with the Navy that the 2.36-acre project site is located outside the coastal zone because it is on federal land (which is excluded from the coastal zone) and is inland of the coastal zone boundary, that the 1.37 acres of non-tidal wetlands on the site are severely degraded, hydrologically isolated, and not feasibly restorable, and that the proposed project would not adversely affect wetlands, water quality, or other marine habitat and resources within the coastal zone. We therefore **concur** with the negative determination made pursuant to 15 CFR Section 930.35(d) of the NOAA implementing regulations. Please contact Larry Simon of the Commission staff at (415) 904-5288 should you have any questions regarding this matter.

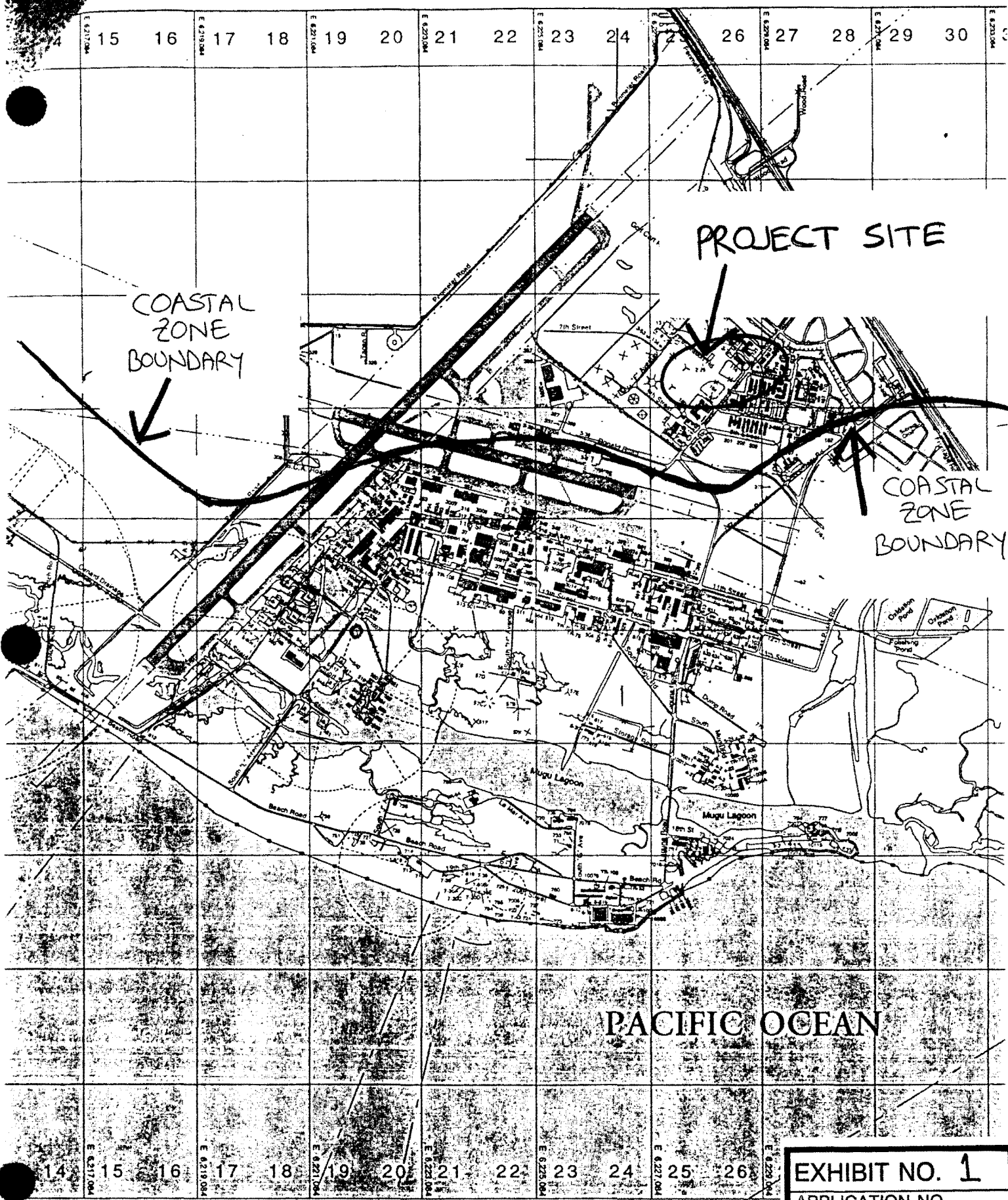
Sincerely,

PETER M. DOUGLAS
Executive Director

cc: South Central Coast Area Office
U.S. Army Corps of Engineers, Ventura

OCRM
NOAA Assistant Administrator
Assistant General Counsel for Ocean Services
Department of Water Resources
Governor's Washington, D.C., Office

G/land use/federal consistency/consistency determination/1999/cd-002-99



PROJECT SITE

COASTAL ZONE BOUNDARY

COASTAL ZONE BOUNDARY

PACIFIC OCEAN

EXHIBIT NO. 1
APPLICATION NO.
ND-2-99
California Coastal Commission

IF SHEET IS LESS THAN 11" X 17" IT IS A REDUCED PRINT SCALE REDUCED ACCORDINGLY

In general . . .
 No tidal inundation
 Isolated
 No presence of water
 Sparse wetland vegetation or
 dominated by non-native grasses
 Large areas of salt panne.

PROJECT
 SITE

In general . . .
 Located adjacent to large body of
 high quality wetland
 Water present/tidal flush
 Vegetated or aquatic environment
 High species diversity, including
 sensitive species

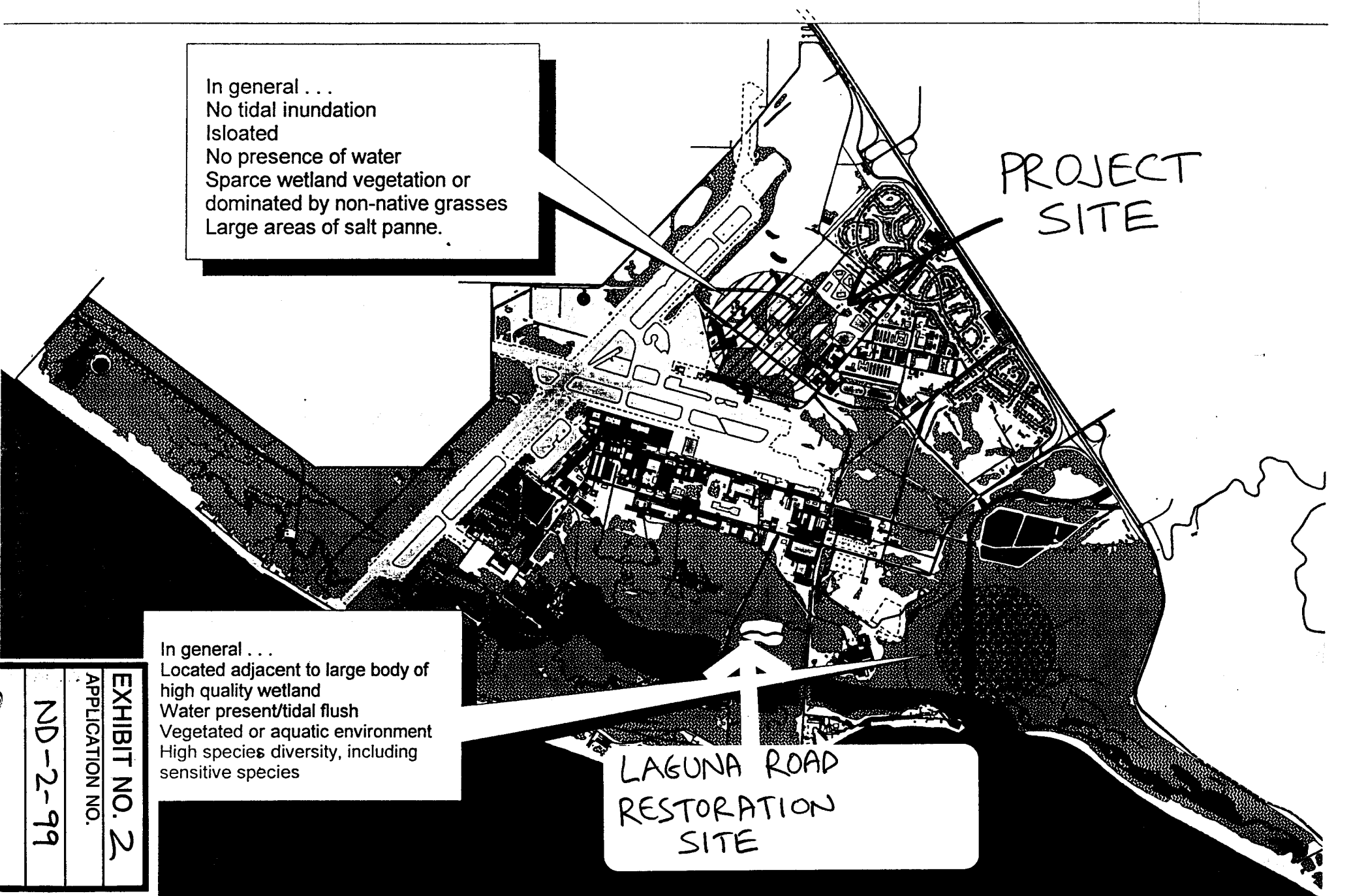
LAGUNA ROAD
 RESTORATION
 SITE

EXHIBIT NO. 2
 APPLICATION NO.
 ND-2-99

Examples of high quality and
 low quality wetlands

Wetland

0.5 0 0.5 Miles



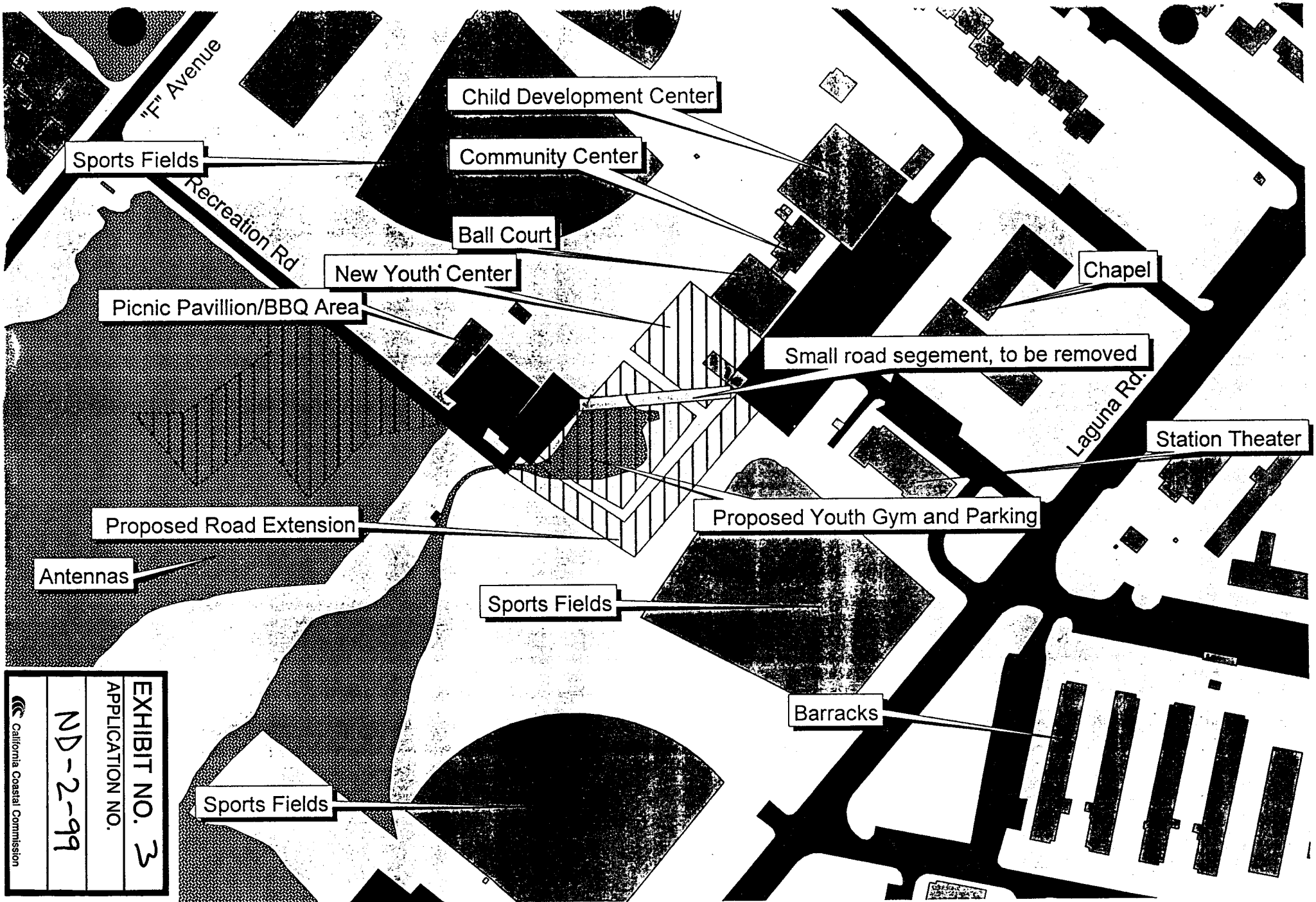







EXHIBIT NO. 3
 APPLICATION NO.
 ND-2-99
 California Coastal Commission


Existing and Future Community Support Facilities

-  Existing paved roads and parking
-  Gray are existing facilities
-  Proposed Facilities/Roads
-  Wetland

100 0 100 200 Feet
 1 inch = 200 feet



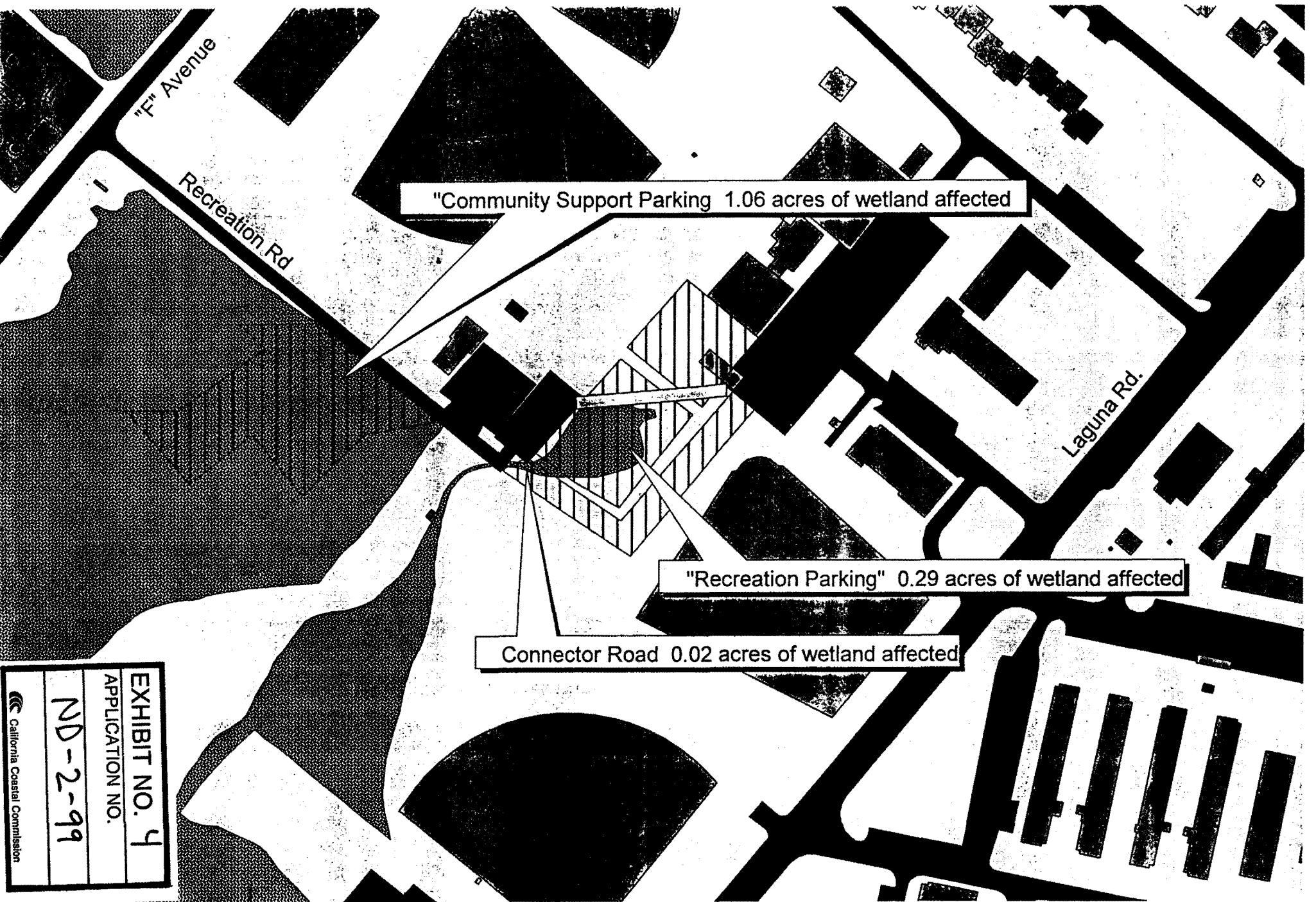








EXHIBIT NO. 4
 APPLICATION NO.
 ND-2-99
 California Coastal Commission


SURETY
 Summary of Wetlands Affected by Total Project





-  Existing paved roads and parking
-  Gray are existing facilities
-  Proposed Facilities/Roads
-  Wetland

100 0 100 200 Feet
 1 inch = 200 feet




 California Coastal Commission
 EXHIBIT NO. 5
 APPLICATION NO.
 ND-2-99

 Wetland Areas
 Affected; Pre-permit

-  Existing paved roads and parking
-  Gray are existing facilities
-  Wetland Areas Affected - pre-permit
-  Wetland

