

CALIFORNIA COASTAL COMMISSION

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**Tu13b****March 23, 2000**

TO: COASTAL COMMISSIONERS AND INTERESTED PARTIES

FROM: Peter Douglas, Executive Director
Mark Delaplaine, Federal Consistency Supervisor
Larry Simon, Federal Consistency Staff

SUBJECT: U.S. Navy Modifications to CVN Homeporting Project, NASNI, Coronado (CD-89-99), as made at February 15, 2000, Commission meeting.

The attached draft letter to the U.S. Navy, and the attached **revised** Commission memorandum of February 10, 2000, summarizes the modifications to the above-referenced project made by the Navy at the February 15, 2000, Commission meeting in San Diego. These modifications focus on measures to further protect water quality and to improve emergency response planning. Prior to the Navy formally incorporating these modifications into its official CVN homeporting consistency determination documents, the staff believes that the Commission should agree that the modifications, as outlined in the attached revised Commission memorandum of February 10, 2000, accurately reflect the action the Commission took at its February 15, 2000, meeting. With that agreement, the Commission staff will send the attached letter to the Navy.

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April xxx, 2000

Captain Bob Phillips
Southwest Division
Naval Facilities Engineering Command
ATTN: John Rogers
2585 Callagan Hwy., Bldg. 99
San Diego, CA 92136-5198

Subject: CD-89-99 (CVN Homeporting, NASNI, San Diego)

Dear Captain Phillips:

The Coastal Commission concurred with the above-referenced consistency determination on December 8, 1999. On February 15, 2000, the Commission reviewed additional project information on water quality, thermal discharge, and emergency planning (summarized in Commission memorandum dated February 10, 2000), and agreed that the proposed project remains consistent with the California Coastal Management Program. During the February 15 Commission meeting, the Navy made additional modifications to the project regarding water quality and emergency planning, and agreed to incorporate those modifications into its homeporting consistency determination documents.

By letter, the Navy should now confirm to the Commission that the following modifications to the CVN homeporting project, as referenced to the attached **revised** February 10, 2000, memorandum to the Commission, have been formally incorporated into your CVN homeporting consistency determination documents:

Water Quality: see modifications on pages 3, 4 and 5.

Emergency Planning: see modifications on pages 10 and 11.

Thank you for your attention to this matter. Please contact me should you have any questions, and I look forward to receiving the Navy's confirmation letter.

Sincerely,

Larry Simon
Federal Consistency Staff

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February 10, 2000

TO: COASTAL COMMISSIONERS AND INTERESTED PARTIES

FROM: Peter Douglas, Executive Director
Mark Delaplaine, Federal Consistency Supervisor
Larry Simon, Federal Consistency Staff

SUBJECT: Water Quality, Thermal Discharge, and Emergency Plan Elements, U.S. Navy
CVN Homeporting Project, Naval Air Station North Island, Coronado, Submitted
in Compliance with CD-89-99.

I. BACKGROUND:

On December 8, 1999, the Commission concurred with the U.S. Navy's consistency determination (CD-89-99) for the homeporting of two NIMITZ-class nuclear-powered aircraft carriers (CVN) at Naval Air Station North Island, Coronado, San Diego County (NASNI). At that hearing, the Navy committed to bring before the Commission at a future public hearing additional project information regarding water quality, thermal discharge, and emergency planning. The Navy agreed that this would occur no later than the April 2000 meeting, and sooner if feasible. Since the December hearing, the Commission staff has met with Navy representatives in San Francisco and San Diego to determine the information needed to address the three aforementioned issues and to tour the CVN wharf at NASNI. On January 24, the Commission staff received the water quality and emergency plan information requested of the Navy.

The timing of this submittal did not provide sufficient time for the staff to analyze the information and prepare a staff recommendation for the February meeting mailing deadline on whether the proposed project, as clarified with the recently-submitted information, would continue to be carried out in a manner consistent to the maximum extent practicable with the California Coastal Management Program. However, the Commission staff determined it was in the public interest to schedule this item for the February meeting in San Diego, to send all the materials submitted by the Navy to the Commission in the mailing packet, to ensure that the Environmental Health Coalition and the City of Coronado also received the Navy materials, and to hand-carry to the February meeting the Commission staff's analysis and recommendation on the adequacy of the Navy's submittal. In this way the interested public can review the Navy materials and submit comments to the Commission staff prior to completion of the staff

recommendation, Commissioners have the opportunity to review the Navy materials prior to the hearing, the Navy is given the opportunity to obtain Commission review in a timely manner, and public participation is maximized by holding the public hearing in San Diego. If the Commission determines it will need more time to review this late staff analysis and recommendation, the matter could be held over until the March meeting in Carmel. This report contains the staff's subsequent analysis of the Navy's submittal.

II. PROCEDURES:

The Commission's review of this submittal is being carried out under Section 930.44 of the federal consistency regulations, which provides that:

(a) Federal and State agencies shall cooperate in their efforts to monitor Federally approved activities in order to make certain that such activities continue to be undertaken in a manner consistent, to the maximum extent practicable, with the State's management program.

III. WATER QUALITY:

In response to the Commission's request for additional information regarding the Navy's plan to prevent and control potential nonpoint source pollution on the proposed CVN wharf, the Navy submitted the following documents to the Commission:

1. A copy of the Monitoring and Reporting Plan (MRP) for NASNI. Navy plans to develop a monitoring plan for the proposed wharf, using the MRP as a model.
2. A copy of the section from the existing Storm Water Pollution Prevention Plan (SWPPP) that applies to the Stennis CVN Wharf. This section describes both the site-specific and facility-wide Best Management Practices (BMPs) in place on the Stennis CVN Wharf.
3. A draft SWPPP section for the proposed CVN wharf.
4. A comparison of the activities occurring in a shipyard and on the CVN wharf.
5. A list of potential construction BMPs to be implemented.
6. Navy analysis of Coastal Commission BMPs for protection of water quality at NASNI.
7. 1998/99 Annual Report for Storm Water Discharges Associated with Industrial Activities at NASNI.

Specifically, the MRP states the following:

- A. Where there are two or more drainage areas that have industrial facilities and BMPs that are substantially identical, only samples from "representative" outfalls will be collected.
- B. Each year, stormwater samples will be collected during the first hour of discharge from the first storm event of the wet season (October 1 through May 31) and at least one other storm event during the wet season. The collected samples will be analyzed for routine

- parameters, toxic pollutant parameters, and SIC code-based parameters that are likely to be present in sufficient quantity.
- C. Quarterly non-stormwater discharge visual observations will be performed for each drainage area with industrial facilities. If indications of non-stormwater discharge are observed, additional visual observations will be performed upstream to determine the non-stormwater discharge source. Non-stormwater discharges will be identified as unauthorized or authorized. Unauthorized non-stormwater discharges will be eliminated or permitted. Lastly, non-stormwater discharge visual observations are also required at each authorized non-stormwater discharge source.
 - D. Visual observations of all stormwater discharge locations during the first hour of one storm event per month during the wet season will be performed as well. If the presence of pollutants is observed, efforts will be made following the observations to identify the source of pollutants.
 - E. An annual report will be submitted by July 1 to the RWQCB. The report will include, among others, the visual observation evaluation, laboratory results, and the Annual Comprehensive Site Compliance Evaluation Report (ACSCER).

Upon reviewing this information, the Commission staff believes the Navy will need to incorporate the following additional measures into the NASNI homeporting project in order for the Commission to find the project consistent with the water quality and marine resource protection policies of the California Coastal Management Program:

The MRP that will be developed for the proposed homeporting project will contain the same basic information as that in the MRP for NASNI. Prior to implementation of the monitoring program, the Navy will propose the use of appropriate benchmarks to which the effluent results can be compared, and will submit those benchmarks to the Executive Director for review and agreement for consistency with the CCMP. Appropriate effluent limitations are found in both the RWQCB's Water Quality Control Plan and EPA's Multi-Sector General Permit. In the event of missing effluent limitations for certain analytical parameters, appropriate State and federal water quality objectives can be used for back-calculating the effluent limitations. All assumed dilution and attenuation factors will be fully justified.

In addition, the MRP will clearly document the rationale for considering certain drainage areas "substantially identical". In the annual reports to be submitted to the Regional Water Quality Control Board (RWQCB) and the Coastal Commission, the Navy will examine whether or not the conditions which render certain drainage areas substantially identical continue to hold true. In addition, if BMP modifications are made to a representative drainage area as a result of reported noncompliance with the requirements of the Industrial Stormwater General NPDES Permit, the same BMP modifications will be applied to all drainage areas considered substantially identical, unless such application is not warranted, and the Commission's Executive Director concurs with that conclusion. Under no circumstances will the proposed wharf or any drainage areas therein be considered substantially identical to the existing naval wharves solely to avoid monitoring.

Stormwater samples collected from each monitored outfall will be analyzed for the routine parameters: pH, Specific Conductance, Total Suspended Solids, and Oil and Grease. In addition, potential toxic pollutant parameters and SIC code-based parameters will be analyzed as well. These potential pollutants may include volatile organic compounds and metals. To this end, the Navy will identify all potential pollutants and their associated analytical parameters for each outfall to be sampled. For the proposed wharf, no pollutants will be assumed to be absent or insignificant in quantity, nor will analytical parameters be eliminated based solely on "historical data" from existing wharves. Any future elimination of analytical parameters associated with a potential toxic pollutant will only occur after that toxic pollutant of concern has not been detected in all samples collected or has been present in insignificant quantities, below the established benchmarks, for two consecutive wet seasons. The Navy will ~~seek~~ obtain the Executive Director's review and agreement prior to eliminating analytical parameters from the monitoring program. Likewise, any future reduction in sampling frequency will only occur upon obtaining review and agreement by the Executive Director for consistency with the CCMP. In addition, justifications will be provided in the annual report if samples cannot be obtained during the first hour of discharge from the first storm event of the wet season.

The July 1 annual report will be submitted to both the CCC and RWQCB. The goals of the ACSCER are to identify noncompliance with the NPDES permit and the corrective actions taken, and, if the noncompliance has not been corrected, propose the appropriate SWPPP/BMP revisions to ensure permit compliance. To the extent practicable, all noncompliance should be corrected immediately. No noncompliance will remain uncorrected prior to the beginning of the following wet season. For example, the Navy ~~has~~ incorporated catch basins into the project design in order to capture all runoff at the proposed CVN berths. The Navy subsequently agreed to install catch basin inserts at each of the CVN berth catch basins. These filtration devices will remove oil and grease from stormwater prior to its discharge into San Diego Bay. The catch basins are designed to be retrofitted with oil/water separators and/or filters if it is determined at a future date that these structures are necessary to protect San Diego Bay water quality. While the existing Stennis CVN wharf is meeting stormwater runoff control limits for oil and grease, should the project water quality monitoring and reporting data to be reviewed by the Commission staff for the proposed project indicate that oil and grease limits are being exceeded (even with the catch basin inserts), then the Executive Director could recommend that the Commission find that additional structural (e.g., stormwater diversion facilities) (e.g., oil and grease separators and/or filters) or non-structural (increased pavement sweeping and cleaning) BMPs be implemented to ensure that the project adequately protects water quality and remains consistent with the California Coastal Management Program. To that end, the Navy has committed to obtain funding for and to construct stormwater diversion facilities for the proposed CVN wharves if such diversion becomes necessary to protect San Diego Bay water quality, in the event that water quality standards are exceeded at these locations even after other structural and non-structural stormwater BMPs are implemented. The Commission staff's review of other monitoring results in the annual report could lead to similar recommendations for ensuring compliance with other water quality control benchmarks.

Besides being a berthing facility, material loading and unloading and onboard repairs and maintenance of aircraft carriers will be conducted at the proposed CVN wharf. Specific BMPs are proposed for these activities. These BMPs mirror the ones being implemented at the existing facilities. Due to the nature and location of the facility, nonstructural BMPs will be aggressively pursued to compensate for the limited applicable structural BMPs. Good housekeeping measures such as pavement sweeping will be implemented. Specifically, regular pavement sweeping will be performed at least once every two weeks, and vacuum sweeping will be conducted on a monthly basis when a vessel is at berth; regular pavement sweeping will occur once a month when the berth is vacant.

The Navy has assembled an Environmental Compliance Team that will, on a monthly basis, inspect structural BMPs and ensure the implementation of nonstructural BMPs. During the wet season, more frequent inspections will also be conducted before and after storm events. Depending on worker safety, all corrective maintenance to BMPs will be performed as soon as possible after the conclusion of each storm. All inspection and maintenance results will be documented and reported in the annual report for submittal to the CCC.

Prior to commencement of the project, Navy is required to seek coverage under the Construction General NPDES Permit. This permit requires development of the SWPPP and BMPs in order to prevent and control polluted runoff during the construction phase. Specifically, management practices for erosion and sediment control and chemical control are required. The contractor chosen for this project will be required to implement the BMPs contained in Caltrans Storm Water Quality Handbooks – Construction Contractor's Guide and Specifications and the CCC's Procedural Guidance Manual, where applicable. However, to the extent possible, the Navy should time the clearing and grading activities to avoid the rainy season and minimize the area of bare soil exposed at any one time.

The Commission staff reviewed the 1998/99 Annual Report for Storm Water Discharges Associated with Industrial Activities at NASNI, and in particular the monitoring results for the stormwater outfalls at Stennis CVN wharf, approved by the Commission in November 1995 (CD-95-95). Those results indicate that the structural and non-structural BMPs incorporated into that project are successfully preventing the introduction of pollutants from the Stennis wharf into the waters of San Diego Bay. As noted above, the Navy will develop a SWPPP and MRP for the proposed project similar to the plans for the Stennis wharf, and those plans will include the existing BMPs which are protecting San Diego Bay water quality and the Commission's water quality BMPs which the Navy previously agreed to incorporate into the project.

Water Quality Conclusion. With the Navy's agreement to implement all of the water quality control measures discussed above, the proposed CVN homeporting project would adequately protect the water quality and marine resources of San Diego Bay, and the project would be carried out in a manner consistent to the maximum extent practicable with the marine resource and water quality policies of the California Coastal Management Program.

IV. THERMAL DISCHARGE:

At the December 1999 hearing, the Commission directed staff to: (1) confirm the flow rate and temperature of cooling water discharged from CVNs berthed at NASNI; and (2) examine the potential adverse effects on marine resources in San Diego Bay from the discharge of cooling waters from the CVNs at NASNI. The Navy submitted information stating that conventionally-powered and nuclear-powered aircraft carriers have similar cooling water discharge rates when on-board power plants are shutdown while at berth at NASNI. The discharge rate is approximately 6,300 gallons per minute (gpm). Three CVNs berthed at the same time at NASNI would therefore discharge cooling water at a rate of 18,900 gpm. The cooling water is discharged at a temperature eight degrees Fahrenheit warmer than inflow water. There are 30 to 40 cooling water discharge points located on a CVN and the cooling water is discharged into bay waters that are 50 feet deep at the CVN berths. The Navy calculated that cooling water discharges reach the ambient bay water temperature at approximately 115 feet from the CVN, and that the closest eelgrass beds are approximately 440 feet from the CVN berths.

By way of comparison, the two nuclear reactors at San Onofre Nuclear Generating Station discharge cooling water at a combined rate of 1.66 million gallons per minute through two 18-foot diameter discharge pipes that terminate in water 46 to 53 feet deep. The discharge water is approximately 19 degrees Fahrenheit warmer than the intake ocean water temperature. The four conventional power units at the South Bay Power Plant, located at the southern end of San Diego Bay, discharge cooling water at a combined rate of approximately 400,000 gpm into San Diego Bay water 10 feet deep. The discharge water is approximately 15 degrees Fahrenheit warmer than intake bay water temperature. However, cooling water discharges at the plant can spike up to 25 degrees above the intake water temperature as long as the 24-hour average remains at or below 15 degree level.

Commission staff reviewed a copy of the State Water Resources Control Board's Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays and Estuaries of California (Thermal Plan) and the SWRCB's 1998 Initial Staff Report reviewing the adequacy of the Thermal Plan. The Thermal Plan sets limits on the discharge of elevated temperature wastes into coastal, estuarine, and interstate waters of California, and special provisions are included for control of "thermal waste", defined as cooling water and industrial process water used to carry waste heat. The Thermal Plan includes numerical effluent limitations by type of receiving water, class of discharge, and type of waste. For enclosed bays, the Thermal Plan states that the maximum temperature of elevated temperature waste discharges shall not exceed the natural temperature of the receiving waters by more than twenty degrees Fahrenheit, and that new thermal waste discharges having a maximum temperature greater than four degrees Fahrenheit above the natural temperature of the receiving water are prohibited. In addition, the 1998 Initial Staff Report states that "thermal waste" is included in the definition of "elevated temperature waste", and that this relationship has made interpretation of some of the provisions of the Thermal Plan difficult. The SWRCB may clarify these two categories in the future. However, the Commission staff spoke with SWRCB staff in January 2000, who reported that the Thermal Plan applies only to discharges permitted through the NPDES permit system,

does not apply to private or government vessel cooling water discharges, either while underway or at berth, and that the SWRCB currently has no plans to regulate vessel cooling water discharges.

At the federal government level, plans are in the works for controlling cooling water discharges from Navy vessels. Uniform National Discharge Standards (UNDS) for vessels of the United States armed forces are being developed by the U.S. Environmental Protection Agency and the Department of Defense, under the requirements of the National Defense Authorization Act of 1996. Phase 1 of the UNDS program was completed in 1999 and identified "seawater cooling overboard discharges" as one of the vessel discharges that will be required to be controlled by marine pollution control devices (MPCDs; either equipment or management practices). Phase 2 will develop MPCD performance standards, and Phase 3 will determine the design, construction, installation, and use of MPCDs. Phase 3 is expected to be completed in three to four years.

Commission also staff spoke in January 2000 with a representative of the National Marine Fisheries Service regarding potential cooling water impacts at NASNI. NMFS staff reported that there is no evidence that existing cooling water discharges from Navy vessels at NASNI, including CVs and CVNs, have generated any adverse effects on marine resources in this part of San Diego Bay, and given that the rate and temperature of cooling water discharges for both types of carriers are essentially equivalent, there is no expectation that cooling water discharges associated with the berthing of three CVNs at NASNI will lead to adverse marine resource impacts in the future.

In conclusion, the Commission finds that based on the above information, cooling water discharges from up to three homeported CVNs at NASNI will not generate adverse effects on marine resources in San Diego Bay, and that the homeporting project will be carried out in a manner consistent to the maximum extent practicable with the marine resource policies of the California Coastal Management Program.

V. EMERGENCY PLANNING:

At the December 8, 1999, hearing, the Commission directed staff to provide the Commission with additional details (beyond those contained in the staff report and recommendation for CD-89-99) on the emergency response plans that exist for radiological and/or hazardous materials incidents at NASNI. The staff report prepared for the December 8, 1999, Commission meeting included an analysis of the Navy's emergency planning activities at NASNI, as outlined in the project FEIS and in detailed responses to Commission staff questions regarding specific emergency response planning. The Navy reported to the Commission staff that the Navy has detailed emergency response plans for radiological incidents associated with CVNs and shoreside support facilities; however, these plans are classified and not available for public review. The Navy did submit to the Commission staff on January 24, 2000, a copy of the Unified San Diego County Emergency Services Organization Operational Area Emergency Plan, September 1996 ("Emergency Plan"). The Navy reports that this document provides the general

response scenarios for local, state, and federal government agencies, including the Navy, for a variety of natural and man-made accidents that hold the potential to threaten public health and safety, including radiological and hazardous materials incidents. The Emergency Plan is comprised of the following sections:

Basic Plan:

- Purpose, Objectives and Plan Organization
- Authorities and references
- Situation and Preparedness
- Concept of Operations
- Operational Area Emergency Management System
- Emergency Functions, Staffing and Tasks
- Continuity of Government
- Training, Tests, and Exercises
- Glossary and Definitions

Attachments (Specific Hazards, Hazard Mitigation, Continuity of Government, Mutual Aid, Functional Responsibilities of State and Federal Agencies, Emergency Operations Center)

Annexes:

- A. Emergency Management
- B. Fire and Rescue Mutual Aid Operations
- C. Law Enforcement Mutual Aid Operations
- D. Multi-Casualty Plan
- E. Public Health Operations
- F. Medical Examiner Operations
- G. Care and Shelter Operations
- H. Environmental Health Operations
- I. Communications
- J. Construction and Engineering Operations
- K. Logistics
- L. Emergency Public Information
- M. Mental Health Operations
- N. Damage Assessment and Recovery
- O. Animal Control

The San Diego County Nuclear Power Station Emergency Response Plan is by reference a part of the Emergency Plan, and the County of San Diego's Office of Disaster Preparedness is the lead agency in the emergency response effort outlined in the Emergency Plan.

The Emergency Plan describes:

A comprehensive emergency management system which provides for a planned response to disaster situations associated with natural disasters, technological incidents, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The plan also identifies the sources of outside support which might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies and the private sector.

While Annexes A (Emergency Management), C (Law Enforcement Mutual Aid Operations), I (Communications), and L (Emergency Public Information) include references to responses to radiological and hazardous materials incidents, it is Annex H (Environmental Health Operations) that is most directly relevant to the Commission's interest in the adequacy of emergency responses to an incident at the CVN facilities at NASNI. Annex H includes an outline of the roles and responsibilities of government agencies, including the Occupational and Radiological Health Division and the Hazardous Materials Management Division (page H-7), in the event of a radiological or hazardous waste incident. Further details are provided on pages H-14 through H-17 on the types of responses and services to be provided by various local agencies in the event of an incident, and State and Federal responsibilities are discussed on pages H-19 through H-21. Emergency action checklists for hazardous materials and radiological incidents are provided in Appendix I-2 (pages H-25 and H-26) and Appendix I-5 (pages H-31 and H-32), respectively, of Annex H.

Appendix II of Annex H (pages H-33 through H-40) establishes:

The basic operational concepts, responsibilities and techniques to support governmental efforts to save lives and minimize exposure to radiation in the event of an emergency involving radioactive materials. These emergencies may involve transportation accidents, industrial/ medical facility accidents, or an incident at the San Onofre Nuclear Generating Station [SONGS].

Objectives, authorities and references, concept of operations, emergency response and recovery phases, plan activation, and organizations and responsibilities are discussed in this Appendix.

Appendix II-1 (page H-41) references the separate San Diego County Nuclear Power Station Emergency Response Plan, and Appendix II-2 (pages H-42 and H-43) outline the response to a nuclear terrorist emergency.

Appendix II-3 (pages H-44 through H-46) outline the response to a reactor accident onboard a U.S. Navy nuclear powered vessel in port in San Diego. The appendix notes that:

It is the policy of the Navy and the Department of Energy to ensure that State or Local officials are notified of occurrences that might cause concern because of radiological effects

outside the plant. Such occurrences will not necessarily be emergencies, alerts or unusual events.

Nuclear power plant emergencies on Navy vessels are classified in the Emergency Plan in the same way as incidents at SONGS: unusual events, alerts, site area emergency, and general emergency. Notification and response actions are outlined, and upon verification of an alert or higher classification event, the Emergency Operations Center will be activated in accordance with the Nuclear Power Station Emergency Response Plan. This plan has been designated by the Unified San Diego County Emergency Services Organization as the base document governing the unified response to an event at a Naval nuclear power plant.

In January and February 2000, the Commission staff spoke with representatives of the California Office of Emergency Services, County of San Diego, City of Coronado, and City of San Diego regarding the adequacy of emergency response plans for a radiological or hazardous waste incident at NASNI. All the agencies reported that the Unified San Diego County Emergency Services Organization Operational Area Emergency Plan provides an adequate structure for responding to incidents at NASNI. The notification process has been successfully tested, elements of the plan have been used in response to disasters, disaster exercises have occurred with the Navy's participation and cooperation, and the Navy continues to work with state and local agencies on refining and implementing the plan. The County Office of Disaster Preparedness reported that the San Diego County Nuclear Power Station Emergency Response Plan includes response scenarios and techniques for off-site emergency work by local agencies due to an incident at SONGS, and that these scenarios and techniques are transferable to a radiological incident at NASNI.

In addition, as a part of the CVN homeporting project, the Navy has committed to continue their formal participation with the City of Coronado in that city's current undertaking to develop an emergency response plan for radiological and other hazardous materials incidents at NASNI. That emergency response plan will include (but not be limited to) a "reverse 911" system with a spanish language element to inform the public of an emergency at NASNI, and will include multi-lingual emergency notification, community outreach, and public education materials and activities that reflect the ethnic and language diversity of the region in order to maximize public awareness and safety.

In conclusion, the Navy's classified, site-specific emergency response plan, the Unified San Diego County Emergency Services Organization Operational Area Emergency Plan's Appendix II-3, and the San Diego County Nuclear Power Station Emergency Response Plan, and the Navy's commitment to cooperate with the City of Coronado to develop the aforementioned emergency response plan ensures that Federal, State, and local agencies are prepared to respond to radiological and hazardous materials incidents at NASNI such that public safety and the ability of the public to use the coastal zone in areas surrounding NASNI will not be adversely affected. The Commission finds that the homeporting project will be carried out in a manner consistent to the maximum extent practicable with the public access and recreation policies of the California Coastal Management Program.

VI. CONCLUSION:

The Navy has submitted clarifying information on thermal discharges and emergency planning, and agreed to additional commitments regarding the protection of water quality in San Diego Bay and the cooperative development of an emergency response plan for the City of Coronado. The Commission staff has concluded that the homeporting project will be carried out in a manner consistent to the maximum extent practicable with the California Coastal Management Program.

VII. STAFF RECOMMENDATION:

A. Motion. The staff recommends that the Commission act on this matter by means of the following motion:

Motion. I move that the Commission **disagree** with the Navy's consistency determination (CD-89-99) for the proposed project, on the grounds that: 1) its coastal zone effects are substantially different than originally proposed; and 2) as a result, the project is no longer consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program.

A majority vote in the affirmative will result in the adoption of the following resolution:

B. Resolution. The Commission hereby **disagrees** with the consistency determination made by the Navy for the proposed project, finding that the project: 1) will have coastal zone effects that are substantially different than originally proposed; and 2) as a result, is no longer consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program.

The staff recommends a **no** vote.

~~A. Motion. The staff recommends that the Commission act on this matter by means of the following motion:~~

~~Motion. I move that the Commission continue to agree with the Navy's consistency determination (CD-89-99) for the proposed project, on the grounds that: 1) its coastal zone effects are not substantially different than originally proposed and (2) the project remains consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program.~~

~~A majority vote in the affirmative will result in the adoption of the following resolution:~~

~~**B. Resolution.** The Commission hereby continues to agree with the consistency determination made by the Navy for the proposed project, finding that the project: 1) will not have coastal zone effects that are substantially different than originally proposed; and 2) remains consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program.~~

2-14 Feb.NavyHomeport revised, 3-23-00