

**CALIFORNIA COASTAL COMMISSION**

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**W 11a****STAFF RECOMMENDATION****ON CONSISTENCY DETERMINATION**

Consistency Determination No.	<b>CD-88-02</b>
Staff:	MPD-SF
File Date:	12/4/2002
60th Day:	2/2/2003
75th Day:	2/17/2003
Commission Meeting:	1/8/2003

**FEDERAL AGENCY:**      **Dept. of Veterans Affairs****PROJECT****LOCATION:**

Fort Rosecrans National Cemetery, adjacent to Naval Base Point Loma, Point Loma peninsula, San Diego (Exhibits 1-3)

**PROJECT****DESCRIPTION:**

Land transfer (from the Navy to the Dept. of Veterans Affairs) to expand Fort Rosecrans National Cemetery boundaries, and construction of facilities for columbarium niches (and perimeter fences) (Exhibits 4-7)

**SUBSTANTIVE****FILE DOCUMENTS:**

See page 12.

**EXECUTIVE SUMMARY**

The Dept. of Veterans Affairs (VA) has submitted a consistency determination for a land transfer between two federal agencies to enable it to expand the boundaries of the Fort Rosecrans National Cemetery in Point Loma. The project also includes perimeter fencing and the addition of 6,839 columbarium niches for funerary remains of veterans from the San Diego area.

The primary issue raised by the project is the need to protect the adjacent Point Loma Ecological Reserve (PLER), which contains native, regionally significant, and environmentally sensitive habitat. The project would intrude into the ecological reserve; however the VA has

included land transfer and habitat measures to assure that the reserve size and ecological integrity will not be diminished. In terms of specific sensitive wildlife species, the VA has also coordinated with the U.S. Fish and Wildlife Service, which confirms that the project will not adversely affect threatened and endangered species (coastal California gnatcatcher or Orcutt's spineflower habitat). Therefore, with the mitigation measures, which include providing final mitigation details for the PLER revised boundaries and other habitat mitigation to the Coastal Commission staff for its review and concurrence, the project will protect the habitat and ecological preserve and be consistent with the environmentally sensitive habitat policy (Section 30240) of the Coastal Act.

Additional issues include potential water quality, geologic stability and visual impacts. However with the erosion controls, irrigation commitments, and other measures incorporated into the project, including submittal of final erosion controls and water quality plans to the Coastal Commission staff for its review and concurrence, the project is consistent with the water quality (30231) and geologic stability (30253) policies of the Coastal Act. The project will not affect public views or archaeological resources.

#### **STAFF SUMMARY AND RECOMMENDATION**

**I. Project Description.** The Dept. of Veterans Affairs (VA) proposes a land transfer of 7.7 acres from the Navy to expand the boundaries of the Fort Rosecrans National Cemetery in Point Loma (Exhibits 2-3). The project also includes the addition of 6,839 columbarium niches for the cremated remains of veterans from the San Diego area. The Dept. of Veterans Affairs states that federal legislation requires it to provide burial opportunities for U.S. Veterans and their immediate family dependents at a national cemetery, and that the existing cemetery is at capacity for cremated remains (the VA recently added 7,242 niches within the existing cemetery). The new columbaria will be incorporated into 3- and 5-niche-high columbarium walls (Exhibits 5-6) and will be limited to Parcel 2, a 4.5 acre parcel (Exhibit 4). The length of new concrete walls would be 1,700 ft. Wall heights would be 7 ft. for 5-niche walls and 3.6 ft. for 3-niche walls. A walkway and gravel strip (for flower placement) is also included. No development is proposed at this time for the remaining 3.2 acres of the land transfer area (Parcels 1, 3 and 4 (Exhibit 3)). The project also includes minor grading (Exhibit 11), and relocation of perimeter chain link fencing (Exhibit 7), landscaping, and minor storm drainage improvements. A strip of ornamental, non-native vegetation will be removed. Grading will consist of importation of 402 cu. yds. of fill and cutting (and reuse) of 14 cu. yds. of slope for the foundation. The fence relocation has been designed to protect adjacent environmentally sensitive areas, to more closely follow natural contour lines (compared to existing fencing) and minimize impacts to two small drainages leading into the adjacent Point Loma Ecological Reserve (PLER) (Exhibit 8 & Exhibit 13, p. 11).

**II. 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 CCMP, it can provide guidance in applying Chapter 3 policies in light of

local circumstances. If the LCP has not been incorporated into the CCMP, it cannot be used to guide the Commission's decision, but it can be used as background information. The City of San Diego's LCP has been incorporated into the CCMP.

**III. Federal Agency's Consistency Determination.** The Dept. of Veterans Affairs has determined the project consistent to the maximum extent practicable with the California Coastal Management Program.

**IV. Staff Recommendation:**

The staff recommends that the Commission adopt the following motion:

**MOTION:** I move that the Commission **concur** with consistency determination CD-088-02 that the project described therein is fully consistent, and thus is consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program (CCMP).

**STAFF RECOMMENDATION:**

Staff recommends a YES vote on the motion. Passage of this motion will result in a concurrence with the determination and adoption of the following resolution and findings. An affirmative vote of a majority of the Commissioners present is required to pass the motion.

**RESOLUTION TO CONCUR WITH CONSISTENCY DETERMINATION:**

The Commission hereby **concurs** with the consistency determination by the Dept. of Veterans Affairs, on the grounds that the project described therein is fully consistent, and thus is consistent to the maximum extent practicable, with the enforceable policies of the CCMP.

**V. Findings and Declarations:**

The Commission finds and declares as follows:

**A. Environmentally Sensitive Habitat.** Section 30240 of the Coastal Act provides:

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

The primary habitat issue raised by the project is the need to protect the adjacent Point Loma Ecological Reserve (PLER) (Exhibit 8), which contains native, regionally significant, and environmentally sensitive southern maritime chaparral and Diegan coastal sage scrub habitat (Exhibit 9). The project would intrude slightly into the ecological reserve; however the VA has included land transfer (Exhibit 10) and habitat measures to assure that the reserve size and ecological integrity will not be diminished.

Coastal California gnatcatchers (*Poliophtila californica californica*), federally listed as threatened, are not found in the coastal sage scrub habitat in the project vicinity. The principal environmentally sensitive species of concern near the project site is the Federally listed as endangered Orcutt's spineflower (*Chorizanthe orcuttiana*). The nearest Orcutt's spineflower is located 500 ft. to the north of Parcel 2 where improvements are proposed. This plant grows in openings in southern maritime chaparral, which occur to the east of the site. The proposed perimeter fence will be located outside this habitat, and as far as possible (25 - 50 ft.) from areas that may be suitable for future plantings of this species. The VA states:

*In this portion of Parcel 2, the chain link perimeter fence will be relocated as far as possible from the eastern edge of the expansion parcel to avoid potential relocation areas for sensitive species. In particular, relocation of the perimeter fence (Figure 9) will more closely follow the natural contour lines and minimize impacts to two small drainages leading into the Point Loma Ecological Reserve (PLER). The relocated perimeter fence will be tied into the existing perimeter fence at the cemetery maintenance yard. Construction of the relocated perimeter fence will be conducted primarily within a 10-foot- (3-meter-) wide zone of construction to avoid indirect effects to the PLER and potential relocation areas for sensitive species.*

The VA states:

*The PLER was designed to protect viable sensitive biological communities and to ensure the long-term protection and perpetuation of these resources on Point Loma. The PLER is intended to serve as long-term in-place mitigation to allow the agencies involved to meet their missions while complying with environmental regulations. The PLER was established through joint discussions and agreements between the U.S. Navy, the U.S. Fish and Wildlife Service (USFWS), the National Park Service (NPS), the U.S. Coast Guard, and the City of San Diego. In 1995, the Federal landowners on Point Loma (including VA), the City of San Diego, and USFWS signed an MOU to implement the Point Loma Natural Resources Management Plan (PLNRMP). The primary objective of this plan was the establishment of the PLER. The MOU established certain policies for the long-term preservation of the PLER and established a Reserve Working Group made up of one representative from each of the signatories to the MOU and SWDIV [i.e., the Navy], to regularly address management issues. The Reserve Working Group has designated a Navy and an NPS co chairperson to be responsible for implementing the management guidelines set forth in the PLNRMP and the MOU.*

Describing the impact and proposed mitigation for changes to the PLER Boundary, the VA states:

*The PLER boundary adjustment described in Section 4.1 is not expected to result in adverse impacts to biological resources. In particular, as has been noted, the area that will be removed from the PLER (Figure 16 [Exhibit 10]) will be replaced by adding area to the PLER on VA property. The vegetation communities removed and added to the PLER are summarized in Table 6 [see below]. The area to be added will include sufficient amount (8,102 square feet [752 square meters]) of southern maritime chaparral and maritime succulent chaparral to provide a 2:1 compensation for the area of southern maritime chaparral removed from the PLER. In addition, the area to be added will include an additional amount of maritime succulent scrub to provide a 1:1 compensation (3,615 square feet [336 square meters]) for the area of Diegan coastal sage scrub removed from the PLER. Adding these areas to the PLER will ensure that the areas removed from the PLER are compensated for with a habitat of equal or higher value. The remainder of the area that is needed for the PLER boundary adjustment will provide a 1:1 compensation (13,939 square feet [1,295 square meters]) for the area of disturbed habitat removed from the PLER. However, the habitat being provided (a combination of maritime succulent scrub and disturbed habitat) will provide a net gain in the quality of habitat within the PLER on VA land.*

The VA's Environmental Assessment (EA) contains the following table describing the project's habitat impacts:

**Table 6**  
**PLER Boundary Adjustment**

Vegetation Community	Area Removed square feet (meters)	Area Added square feet (meters)			Net Change square feet (meters)
	Parcel 2	Parcel 1	Western Portion of Cemetery	Total	
Maritime Succulent Scrub	—	—	18,208 (1,692)	18,208 (1,692)	+18,208 (1,692)
Southern Maritime Chaparral	4,051 (376)	4,792 (445)	—	4,792 (445)	+741 (69)
Diegan Coastal Sage Scrub	3,615 (336)	—	—	—	-3,615 (336)
Disturbed Habitat	13,939 (1,295)	—	3,354 (312)	3,354 (312)	-10,585 (983)
<b>Total</b>	<b>21,605 (2,007)</b>	<b>4,792 (445)</b>	<b>21,562 (2,004)</b>	<b>26,354 (2,449)</b>	<b>+4,749 (442)</b>

The EA also includes a number of preliminary mitigation measures designed to avoid and minimize impacts where possible, and details how mitigation will be implemented, although the VA notes that "A separately bound Mitigation Plan is being prepared that will provide additional information on the mitigation measures." The EA indicates that this final mitigation plan will be revised in coordination with the U.S. Fish and Wildlife Service and the PLER Working Group prior to columbarium construction, and, further, upon request by the Commission staff, that the Commission staff will have the opportunity for review and concurrence of the final plan prior to construction. Because an existing MOU between the governmental landowners on Point Loma prohibits construction within the PLER, the VA needs to replace any lands taken out with comparable acreage and habitat values. The EA notes that: "Only a small portion of the area that will be removed from the PLER supports native habitat; however, the boundary adjustment shall offset the total area to be removed from the PLER." The EA further notes:

*Suitable restoration measures will include the removal of iceplant and the subsequent enhancement of those areas. The habitat restoration plan for these areas is further described in the Mitigation Plan to be prepared for this project, including methods to be employed and parties responsible for the restoration process. Native plants from Point Loma that are representative of adjacent native habitats will be used for the restoration project.*

The EA also lists the VA's mitigation commitments to protect sensitive habitat during construction, as follows:

#### *2.5.1 Construction Mitigation Monitoring*

- A Mitigation Plan will be developed prior to construction. The plan will outline measures to avoid potential direct and indirect impacts to adjacent sensitive biological resources. These measures will reduce potential impacts to sensitive vegetation and species from runoff, erosion, sedimentation, and unauthorized human trespass to below a level of significance. Resources that will be monitored include but are not limited to plant species, including Orcutt's spineflower, San Diego barrel cactus, Nuttall's scrub oak, and wart-stemmed ceanothus; native habitats, including Diegan coastal sage scrub, southern maritime chaparral, and maritime succulent scrub; migratory birds; and cultural resources.*
- Specific measures that will be implemented prior to or during construction to reduce potential impacts to sensitive vegetation and species are listed below.*
- Prior to construction, the contractor will develop and implement an erosion control plan to ensure that soil and other materials do not travel downslope impacting natural vegetation and resident species during construction. All erosion control features will be installed prior to the initiation of any construction. The resident engineer is prepared and authorized to stop construction if the contractor's measures deviate from those shown on the plan or are insufficient at controlling erosion. The project site will*

*be fully stabilized prior to construction completion and turnover to VA cemetery maintenance staff. In addition, post-construction erosion monitoring will be conducted by cemetery staff to determine whether adverse erosion occurs in response to the new columbaria or perimeter fencing.*

- Runoff from parking areas and other hardscape areas will not drain directly into the PLER. Minor flow will be directed to inlets with filters for screening prior to entering the PLER and will be directed away from areas with existing erosion problems, the location of sensitive species, and potential relocation areas for sensitive species.*
- Equipment staging and refueling areas will be located in disturbed and developed areas, away from sensitive habitats and natural drainages. If staging areas outside the construction footprint are used, they will be surveyed for biological resources prior to their use.*
- All construction activities, including staging areas, equipment access, and disposal or temporary placement of excess fill, will be prohibited within off-site drainages.*
- Existing roads or disturbed areas will be used to access the project site. If unauthorized new or temporary access routes are determined to be necessary, these areas will be surveyed for biological resources prior to their use. All access routes will be clearly marked (i.e., flagged and/or staked) prior to the onset of construction. No new access routes, on Navy land, will be authorized outside the existing project footprint without prior approval from the Navy.*
- Implementation of standard dust abatement measures and standard construction best management practices (BMPs), such as the use of water trucks or restricting grading during periods of excessive wind velocity, will reduce potential impacts from fugitive dust to below a level of significance.*
- The location of stockpile areas associated with the project site will be delineated on grading plans and reviewed and approved by a biologist.*
- Prior to the initiation of construction activities at the site, a qualified biologist and archaeologist will educate all construction personnel about the sensitive resources on and near the site, the authorized limits of impacts, the ramifications of impacts beyond those authorized, and the monitoring program. The lines of communication during construction will be discussed at this meeting.*
- Prior to any brushing, clearing, or grading at the site, the approved limits of these activities will be clearly delineated by a survey crew with construction fencing or appropriate marking. These limits will be checked by a biologist before the start of any construction activities within the authorized areas. VA will be responsible for mitigation of impacts to sensitive resources beyond those authorized.*

- *The perimeter fencing will prohibit access into the native habitat beyond the fenceline. Signage will be installed at key locations as determined necessary internal to the perimeter fence to avoid potential impacts to the sensitive habitat remaining on-site. The project biologist will determine where signage would be necessary to curtail accidental disturbance from humans.*
- *Night lighting is not part of the columbaria construction project. Nighttime construction is not anticipated; however, if it becomes necessary for completion, then lighting will be diverted away from the PLER and adequately shielded.*
- *No invasive non-native plant species will be planted adjacent to the PLER. All proposed landscaping shall be reviewed and approved by the project biologist.*
- *Ornamental (non-native) plant cuttings will not be located in areas adjacent to the PLER to minimize the possibility they could encroach into the PLER, or that plant fragments or seed could regenerate within the PLER. In addition, efforts will be made to limit the amount of ground disturbance near the PLER so that seeds from invasive non-native species cannot take root. Any future temporary ground disturbance adjacent to the PLER that creates areas of exposed soil should be treated with a native seed mix to encourage the establishment of native species.*
- *To avoid indirectly impacting nesting activities of birds covered by the Federal Migratory Bird Treaty Act (MBTA), construction activities will be timed outside the breeding/nesting season for migratory birds (February 1 to August 31). If construction activities must extend beyond February 1 or commence prior to August 31, and the activities adjacent to or within 500 feet (152.4 meters) of the PLER would have noise levels exceeding 60 decibels (A-weighted scale) (dBA), then the need for noise reduction measures (e.g., temporary noise and line-of-sight barriers) will be analyzed and implemented as directed by a biologist. Up to 1 week prior to construction during the breeding season, a qualified biologist will conduct a nest survey to determine the location of any active nests or nesting activity. If an active nest or nesting behavior is observed, construction activities within 500 feet of the active nest that generates noise in excess of 60 dB will cease until nesting activity at that location has been completed, or ambient noise is attenuated to 60 dB or lower. Throughout the nesting season, the biologist will conduct weekly nesting surveys to ensure that no nesting activity is occurring within 500 feet of construction that contributes to ambient noise levels in excess of 60 dB.*
- *To minimize the impact to native habitats, the perimeter fence will not be relocated beyond the edge of the grading limits in the northern portion of Parcel 2. In the southern portion of Parcel 2, the perimeter fence will be relocated as far away as possible from the eastern edge of the expansion parcel to avoid sites determined to be suitable for future relocation of sensitive species. In particular, relocation of the perimeter fence will more closely follow the natural contour lines and minimize impacts to two small drainages leading into the PLER.*



- *The removal of vegetation, as needed for perimeter fence installation, will be monitored. Construction of the relocated perimeter fence will be conducted primarily within a 10-foot- (3-meter-) wide zone of construction to minimize indirect effects to vegetation.*

At this time the VA has not finalized the mitigation plan and PLER boundary reconfiguration. However, at the Commission staff's request the VA has committed to submitting the final habitat mitigation plans, PLER revised boundaries, and final erosion controls and water quality plans, to the Coastal Commission staff for its review and concurrence, prior to commencement of construction. Given that the VA has committed to avoiding habitat impacts where possible, and, where impacts would occur, minimizing and mitigating all impacts as described in the above commitments, with Commission staff review and concurrence of the final plans to assure that these mitigation commitments are maintained, the Commission finds that the project will protect the sensitive habitat and the ecological preserve and is consistent with the environmentally sensitive habitat policy (Section 30240) of the Coastal Act.

**B. Water Quality.** Section 30231 of the Coastal Act provides:

*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.*

The VA has analyzed runoff and water quality impacts and included commitments for protecting water quality. The VA notes in the EA:

*Steep slopes and ravines characterize the topography immediately outside of the project area. Without adequate mitigation, indirect impacts to adjacent vegetation could occur in the form of runoff, erosion, sedimentation, fugitive dust, exotic species invasions, and unauthorized human trespass from construction crews. Excess runoff could scour vegetation or alter community dynamics through changes in hydrological processes. The amount of runoff from the new impervious surfaces of the proposed columbarium is not expected to be excessive. Moreover, as described in Section 2.2, runoff will be collected in a perforated drain pipe located under a gravel strip between the concrete walk and the base of the columbarium walls, which will be connected to the existing storm drain system or into ground sumps located on-site. As a result of these design measures, indirect impacts from runoff would be reduced to a level of nonsignificance. Erosion and sedimentation could potentially destroy sensitive vegetation and species. However, the construction contractor will prepare and implement an erosion control plan prior to the beginning of construction. All erosion*

*control features will be installed prior to the initiation of construction and the resident engineer will stop construction if the contractor's measures deviate from those shown on the plan or if they are ineffective. Thus, the indirect impacts from erosion and sedimentation would be reduced to below a level of significance.*

While the VA commits to minimizing grading and providing for erosion controls, the VA notes that the grading plan has not been finalized (especially for the northern portion of Parcel 2), and, as noted above, the erosion control plans are not yet complete. Nevertheless the VA has committed to performing grading in a manner that will reduce sheet flow,<sup>1</sup> improving moisture retention on site, implementing soil decompaction and exotic weed control measures, revegetating graded areas with native plants to the fullest extent possible, providing soil amendments to reduce runoff, and, as mentioned in the previous section of this report, locating the perimeter fencing as far as possible from native habitat.

With these measures, which include, at the Commission staff's request, the VA's commitment to submitting the final erosion controls and water quality plans to the Coastal Commission staff for its review and concurrence, prior to commencement of construction, to assure that the mitigation commitments will be carried out, the Commission finds that the project will minimize sedimentation and erosion and protect water quality and is consistent with the water quality policy (Section 30231) of the Coastal Act.

**C. Public Views.** Section 30251 of the Coastal Act provides:

*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

The proposed wall construction will be located approximately 200 ft. east of Cabrillo Memorial Drive, a highly scenic ridge road providing visual and recreational public access down the Point Loma peninsula to the Cabrillo National Monument, with spectacular bay and ocean views on either side. However the topography is such that the proposed fence would not block any public views from the road, and the proposed walls are similar to adjacent existing columbarium walls and compatible with other development as seen from the road. The Commission therefore finds that the project is consistent with the requirements of Section 30251 of the Coastal Act to minimize scenic coastal view impacts and be visually compatible with the character of the surrounding area.

**D. Geologic Stability.** Section 30253 of the Coastal Act provides, in part, that:  
*New development shall:*

...  
(2) *Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*  
...

The EA for the project notes that a City of San Diego-conducted Seismic Safety Study identified a major landslide, the Fort Rosecrans landslide, to the east of the project site (Exhibit 12). This landslide area is within approximately 125 feet of the project site; the EA notes that:

*It is considered to be marginally stable, although no offsets have been noticed since about 1967. Secondary slides to the west (above) have lost support due to the main slide. The probability of reactivation of these secondary slides is considered high. Water infiltration as a result of irrigation at the cemetery has been postulated as a factor in the first slide action (Ogden 1987).*

To assure additional geologic threat is avoided, the VA has included in its mitigation commitments the avoidance of any additional irrigation that could increase geologic instability. The VA states:

*There are no irrigation features associated with the Proposed Action, so increased water consumption will not occur. The Proposed Action will result in the creation of approximately 8,500 square feet (789.7 square meters) of impervious surface; however, a 4-inch (10.2-centimeter) PVC perforated drain pipe will be installed under the 12-inch- (30.5-centimeter-) wide gravel drainage strip between the concrete wall and the base of the columbarium wall and will drain into the existing storm water system or into a ground sump that will be constructed. Concrete riprap will also be installed behind the columbarium wall to minimize soil erosion. The only change to the irrigation system will be the installation of one or two spigots on the columbarium wall to provide water for flower vases. No other expansion of the existing irrigation system is proposed.*

With this measure, the Commission finds the proposed project would not contribute to geologic instability and is consistent with Section 30253 of the Coastal Act.

**VI. Substantive File Documents:**

1. Final Environmental Assessment, Fort Rosecrans National Cemetery Expansion, Department of Veterans Affairs, November 2002.

2. Memorandum of Agreement Between the Federal Land Owners on Point Loma, San Diego: City of San Diego; and U.S. Fish and Wildlife Service

3. Consistency Determination CD-105-95, National Park Service, General Management Plan for the Cabrillo National Monument.

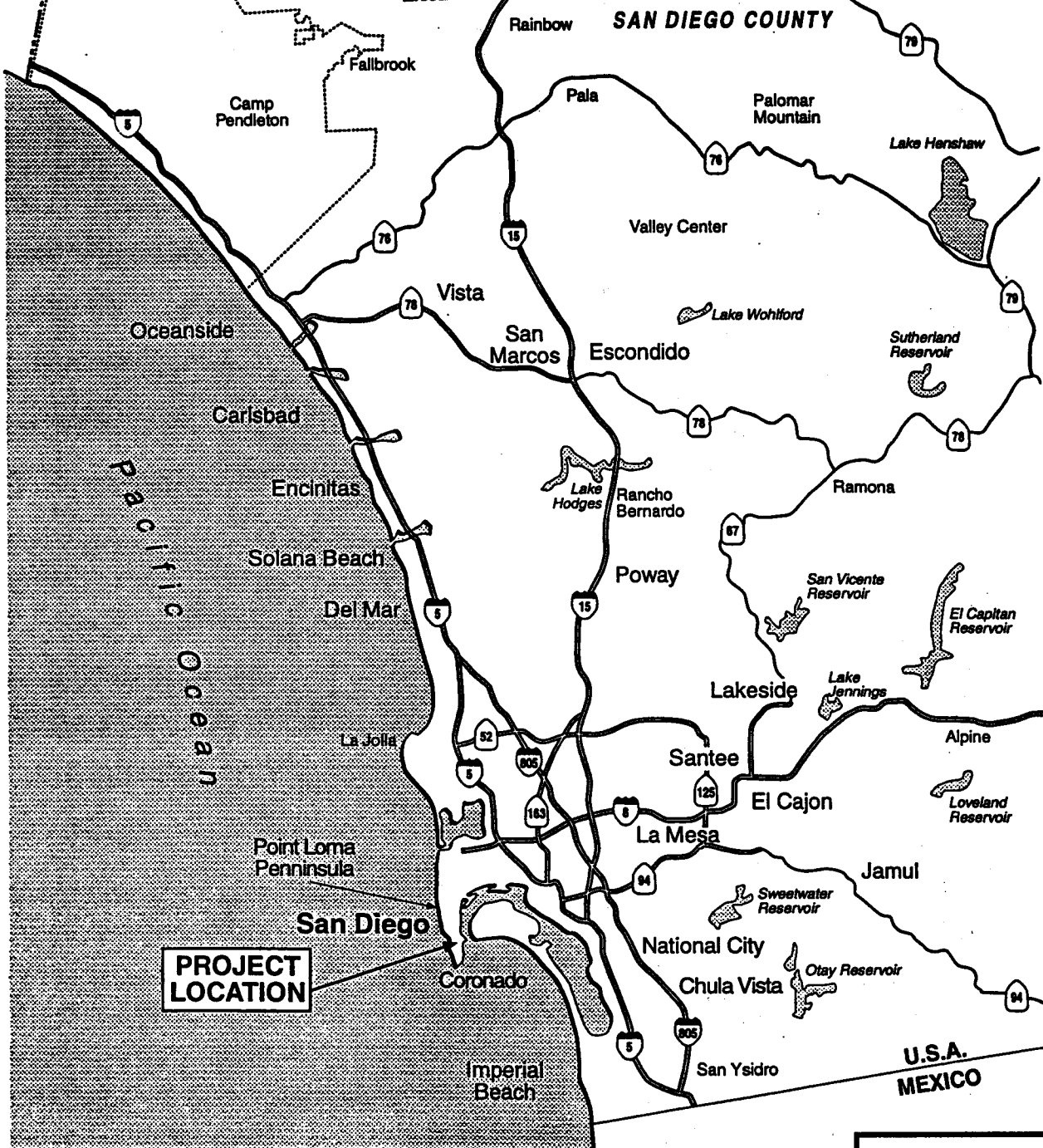
4. Consistency and Negative Determinations ND-140-96, CD-136-97, ND-63-99, ND-46-00, ND-120-00, National Park Service, habitat restoration, tidepool management and entrance relocation, Cabrillo National Monument.

5. Consistency Determination CD-25-01, Navy communications tower, Point Loma.

ORANGE COUNTY

RIVERSIDE COUNTY

SAN DIEGO COUNTY



No Scale



Ft. Rosecrans Cemetery Exp.

Graphics 21400 Ft. Rosecrans Cemetery Figure 1 Regional Map (bradyd) 8/7/02

EXHIBIT NO. 1

APPLICATION NO.

CD-88-02

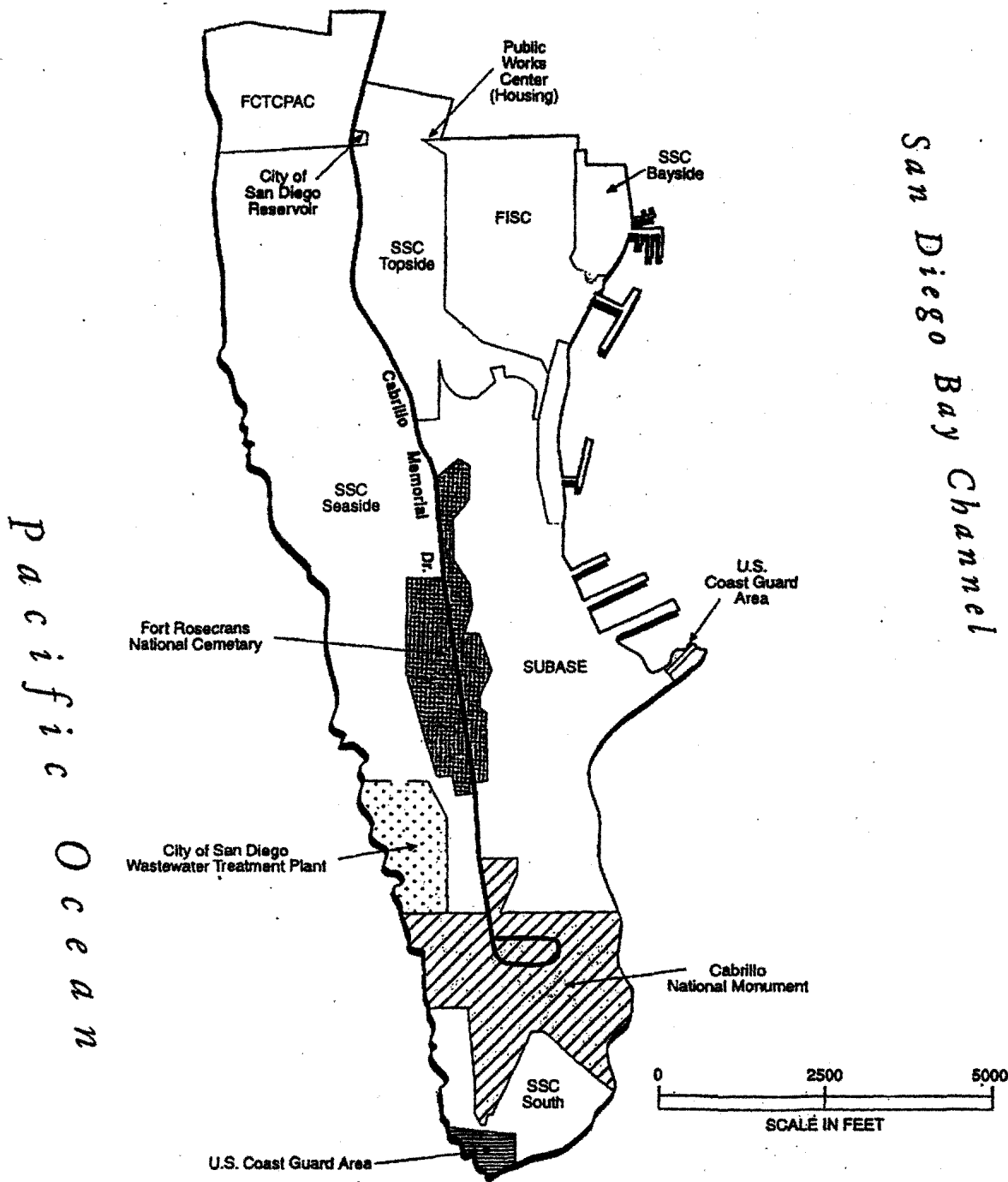


Figure 3



Ft. Rosecrans Cemetery Exp.

Graphics 2J400 Ft. Rosecrans Cemetery Figures Fig 3 vicinity map (bradyd) 8/7/02

EXHIBIT NO. 2
APPLICATION NO.
CD-88-02

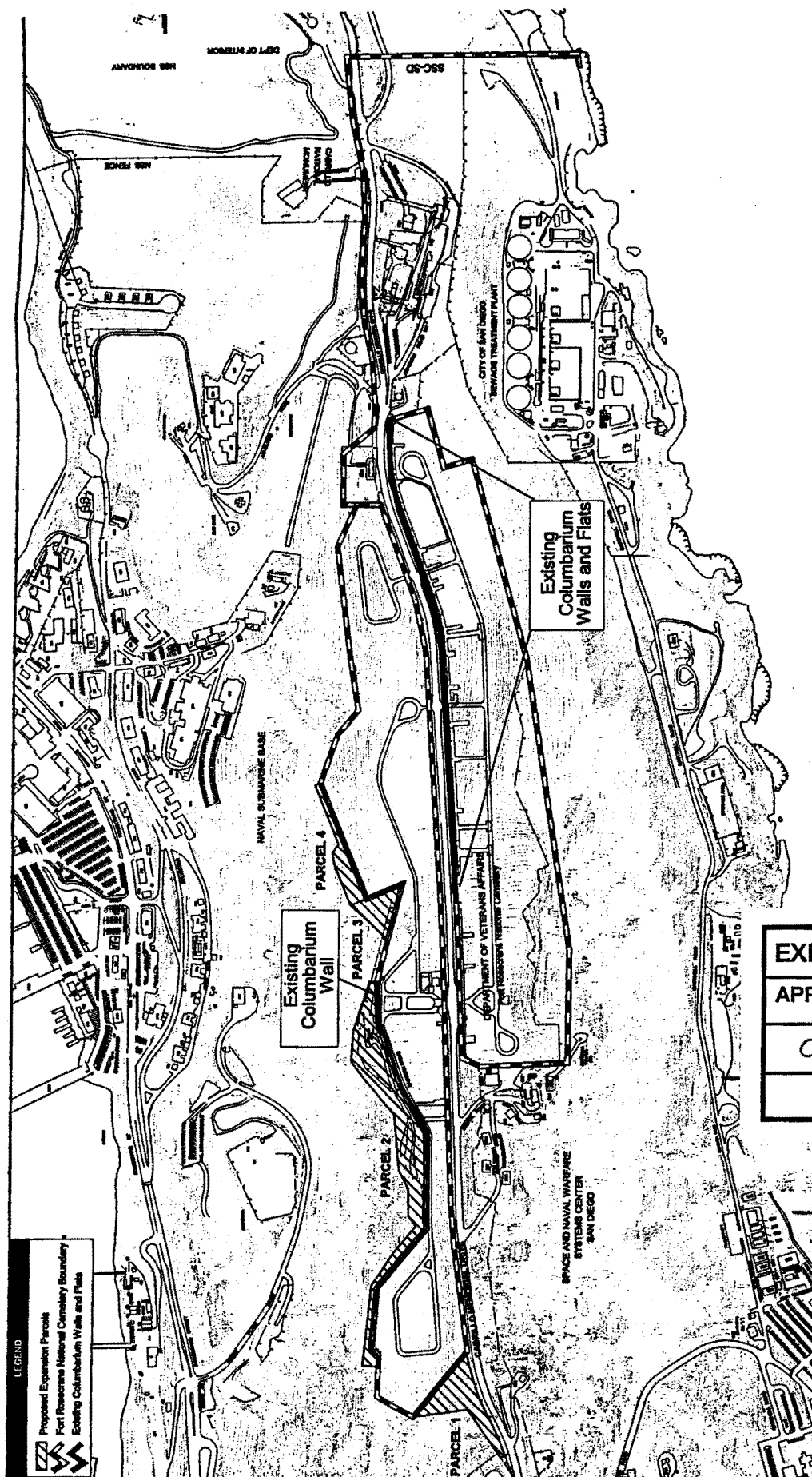


EXHIBIT NO.	3
APPLICATION NO.	

CD-88-02

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Scale: 1 : 6000; 1 inch = 100 feet

Fort Rosecrans National Cemetery Expansion  
GSA/US38-01-UP/Building Columbus, OH 43206 (614) 291-2800

Source: Venn Data 2000

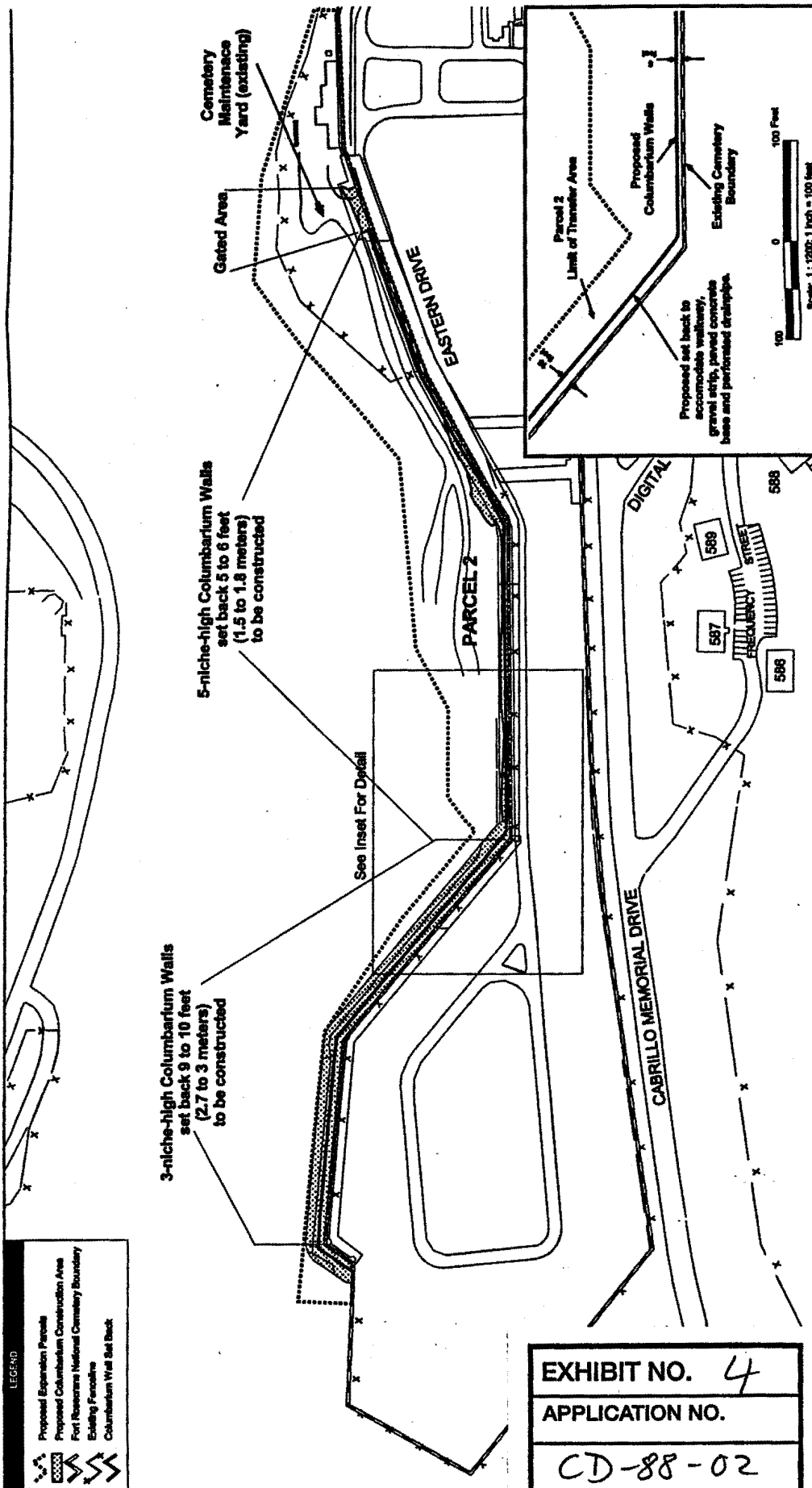


Figure 7  
Proposed Columbarium Construction Area

EXHIBIT NO. 4

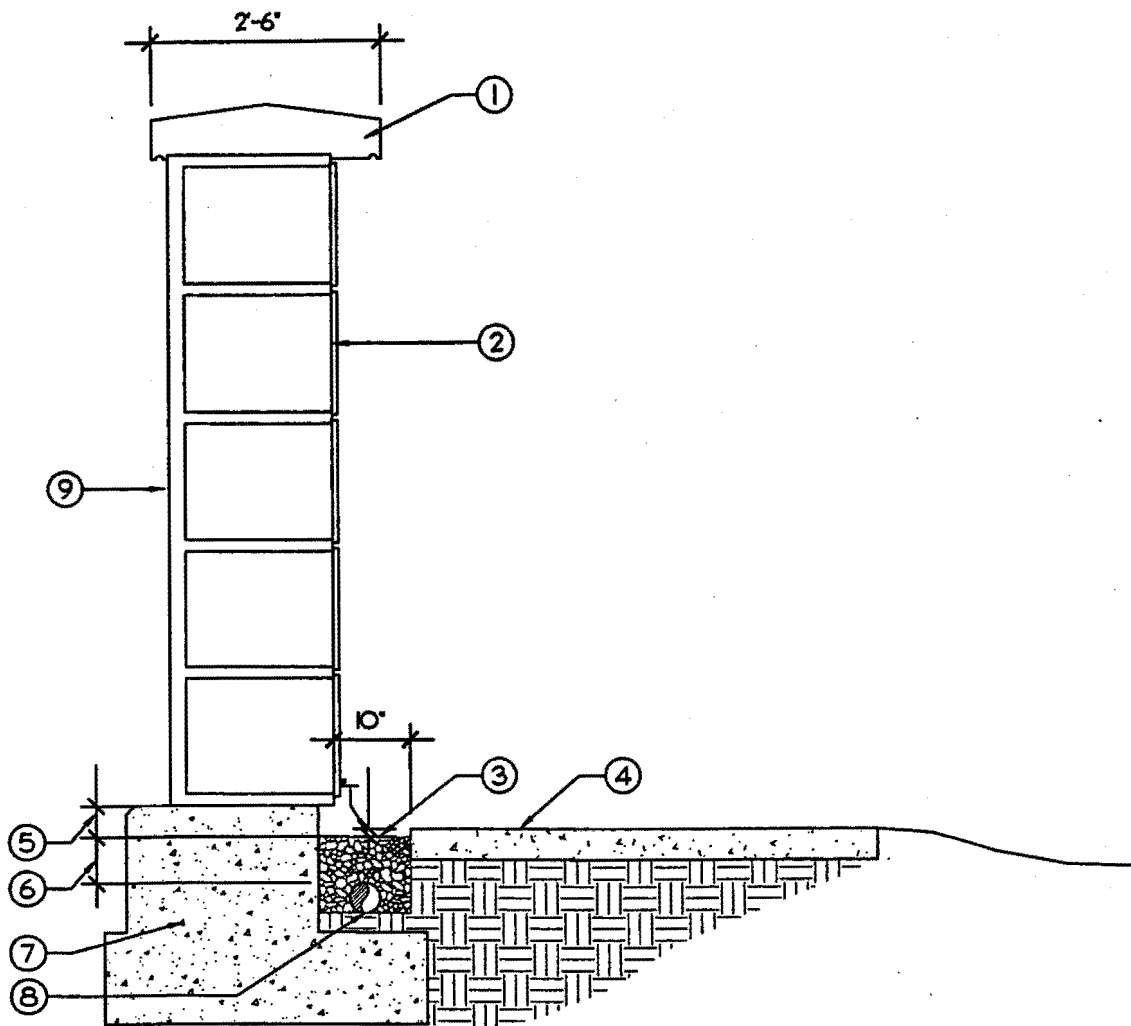
APPLICATION NO.

CD-88-02



Fort Rosecrans National Cemetery Expansion  
CONSTRUCTION OF COLUMBARIUM WALLS AND DRIVEWAY  
JULY 1988





① PRECAST CAP STONE

② NICHE COVER

③ GRAVEL STRIP

④ CONCRETE WALK

⑤ 4' MIN. TO 16' MAX.

⑥ 6' MIN. COVER OVER DRAIN PIPE

⑦ CONCRETE FOOTING

⑧ 4' PVC PERFORATED DRAIN PIPE

⑨ PRECAST UNIT FINISH TO MATCH EXISTING

Source: Van Dyke 2002.

**Figure 8**  
**Columbarium Wall Cross Section**

Fort Rosecrans National Cemetery Expansion  
2K030/CAD/Columbarium Cross Section Detail.dwg (Collins) 6/25/02

EXHIBIT NO. 5

APPLICATION NO.

CD-88-02

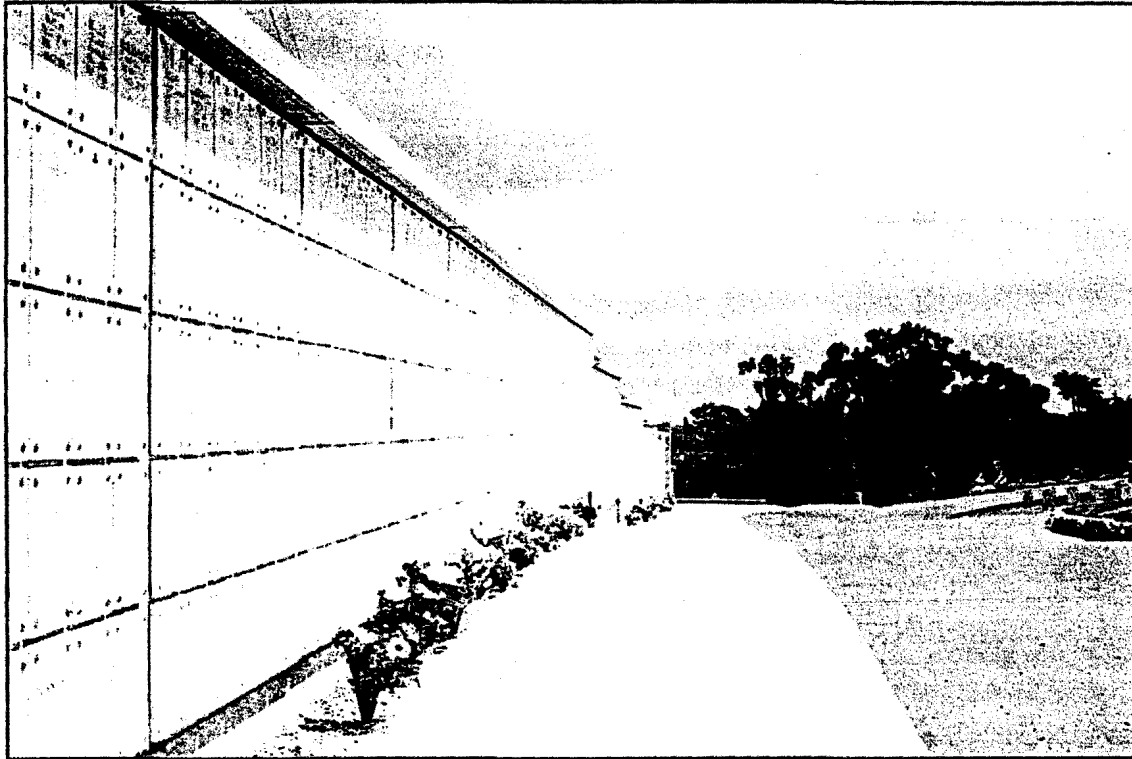
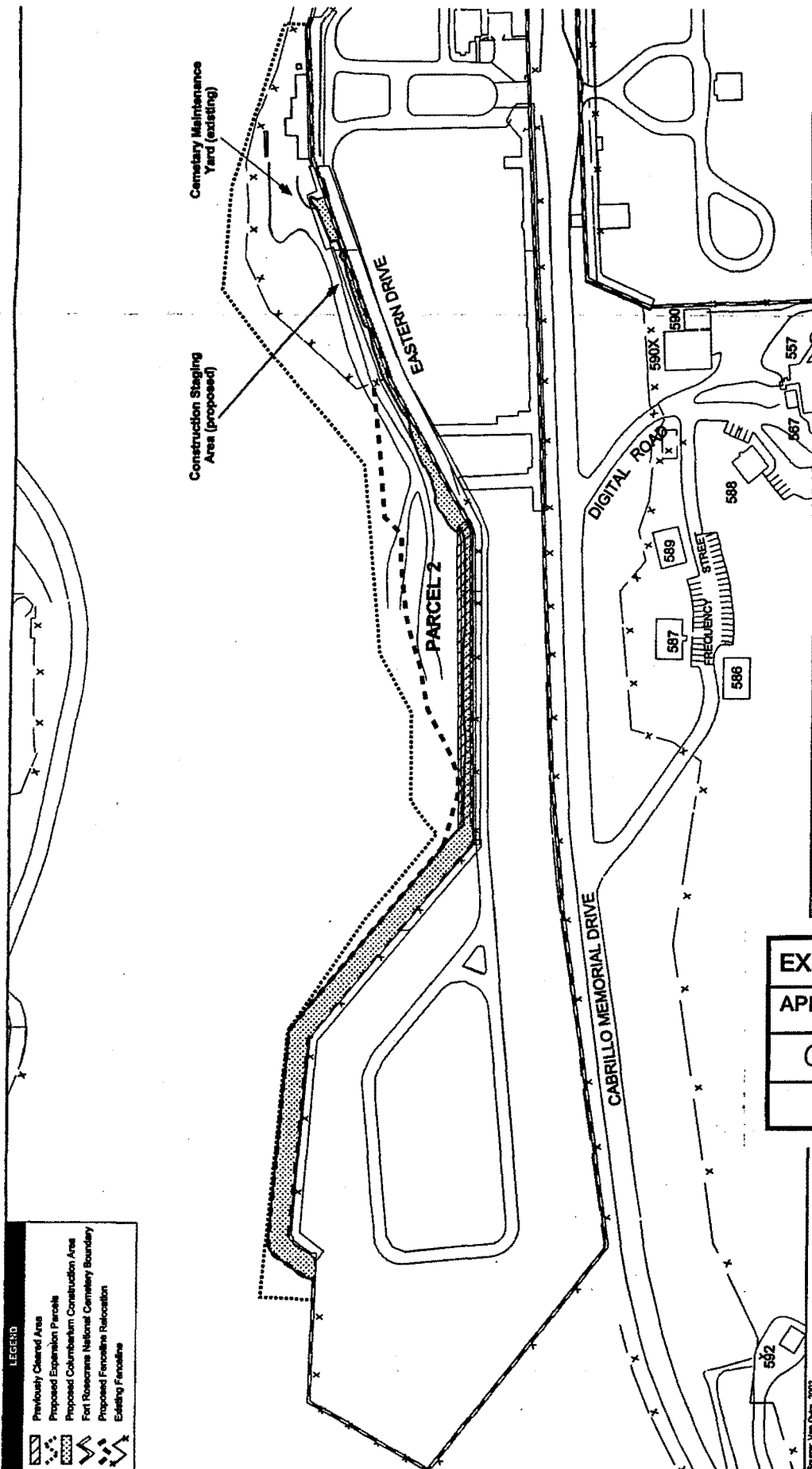


EXHIBIT NO.	6
APPLICATION NO.	
	CD-88-02

**Figure 6**  
**Typical 5 Niche High Columbarium Wall**

**LEGEND**

- Previously Cleared Area
- Proposed Expansion Parcel
- Proposed Columbian Construction Area
- Fort Rosecrans National Cemetery Boundary
- Proposed Fence Relocation
- Existing Fence



**Figure 9**  
Perimeter Fence Relocation

EXHIBIT NO. 17
APPLICATION NO.
CD 88-02

Source: Van Dyke, 2003

Scale: 1" = 100'; 1 inch = 100 feet

Fort Rosecrans National Cemetery Expansion  
Construction Area - Parcel 2 - June 2003

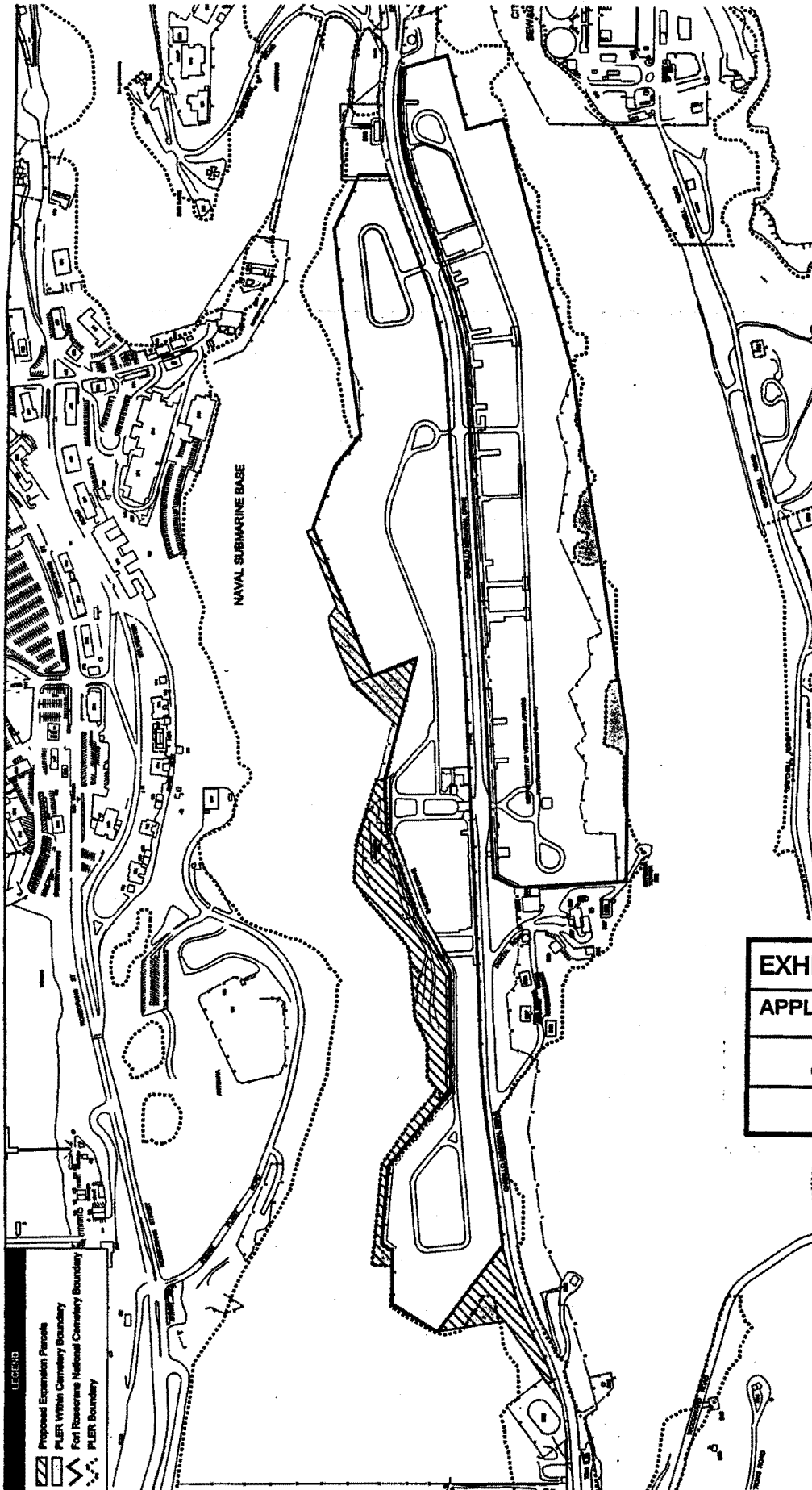


Figure 11  
PLER Within Cemetery Boundary

EXHIBIT NO. 8

APPLICATION NO.

CD-88-02

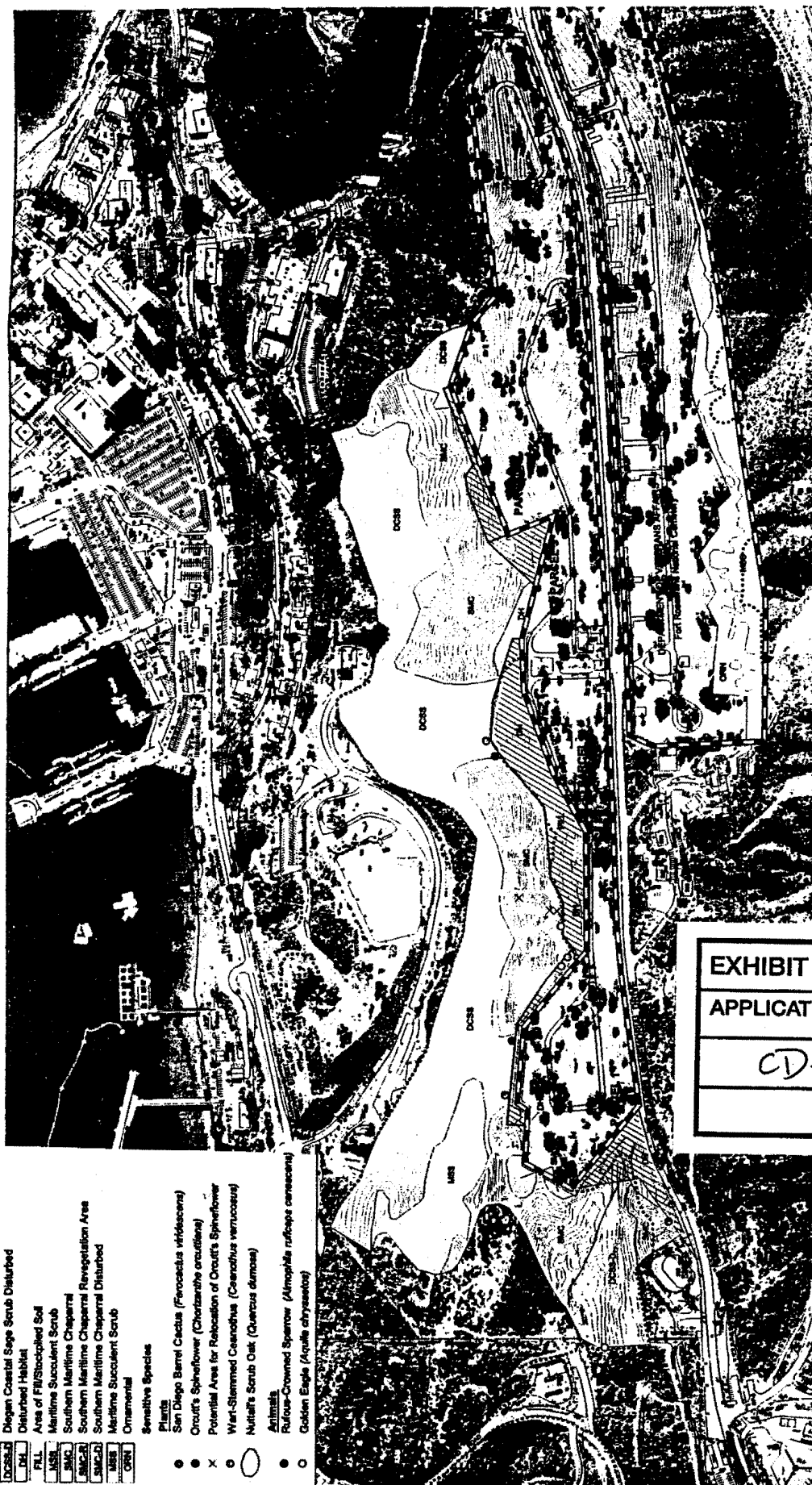
Proposed Expansion Parcels  
Point Loma Ecological Reserve (PLER)  
Cemetery Boundary

- |      |                                       |
|------|---------------------------------------|
| DCSL | Dry Coastal Sage Scrub                |
| DCSL | Dry Coastal Sage Scrub Disturbed      |
| DR   | Disturbed Habitat                     |
| FLL  | Area of Filled/Stockpiled Soil        |
| MSR  | Maritime Succulent Scrub              |
| MSR  | Southern Maritime Chaparral           |
| MSR  | Southern Maritime Chaparral           |
| MSR  | Southern Maritime Chaparral Disturbed |
| MSR  | Maritime Succulent Scrub              |
| ORN  | Ornamental                            |

### Sensitive Species

**P1 writes**

- |   |   |
|---|---|
| ● | San Diego Barrel Cactus ( <i>Ferocactus wislizeni</i> ) |
| ● | Croft's Spineflower ( <i>Chorizanthe arizonicus</i> )   |
| × | Potential Area for Relocation of Croft's Spineflower    |
| ○ | Wart-Stemmed Ceanothus ( <i>Ceanothus verrucosus</i> )  |
| ○ | Nuttall's Scrub Oak ( <i>Quercus dumosa</i> )           |
|   | <b>Animals</b>  |
| ● | Rufous-Crowned Sparrow ( <i>Amphispiza ruficeps</i> )   |
| ○ | Golden Eagle ( <i>Aquila chrysaetos</i> )               |



**Figure 12**  
**Biological Resources Map**

9

CD-88-02



**Fort Rosecrans National Cemetery Expansion**  
 GSA/USDA/AFM/Vegrestores Admin 6 26 03 [usda-afm@gsa.gov](mailto:usda-afm@gsa.gov) 5/11/03 4:50:11 PM





Figure 15  
Biological Resources Map  
Parcel 2 with Grading Limits

0 300 Feet  
1,000: 1 inch = 300 feet

27 Expansion  
27 Addition 2015/18 (4.10.18) 1/10/20

EXHIBIT NO.	11
APPLICATION NO.	
CD-88-02	



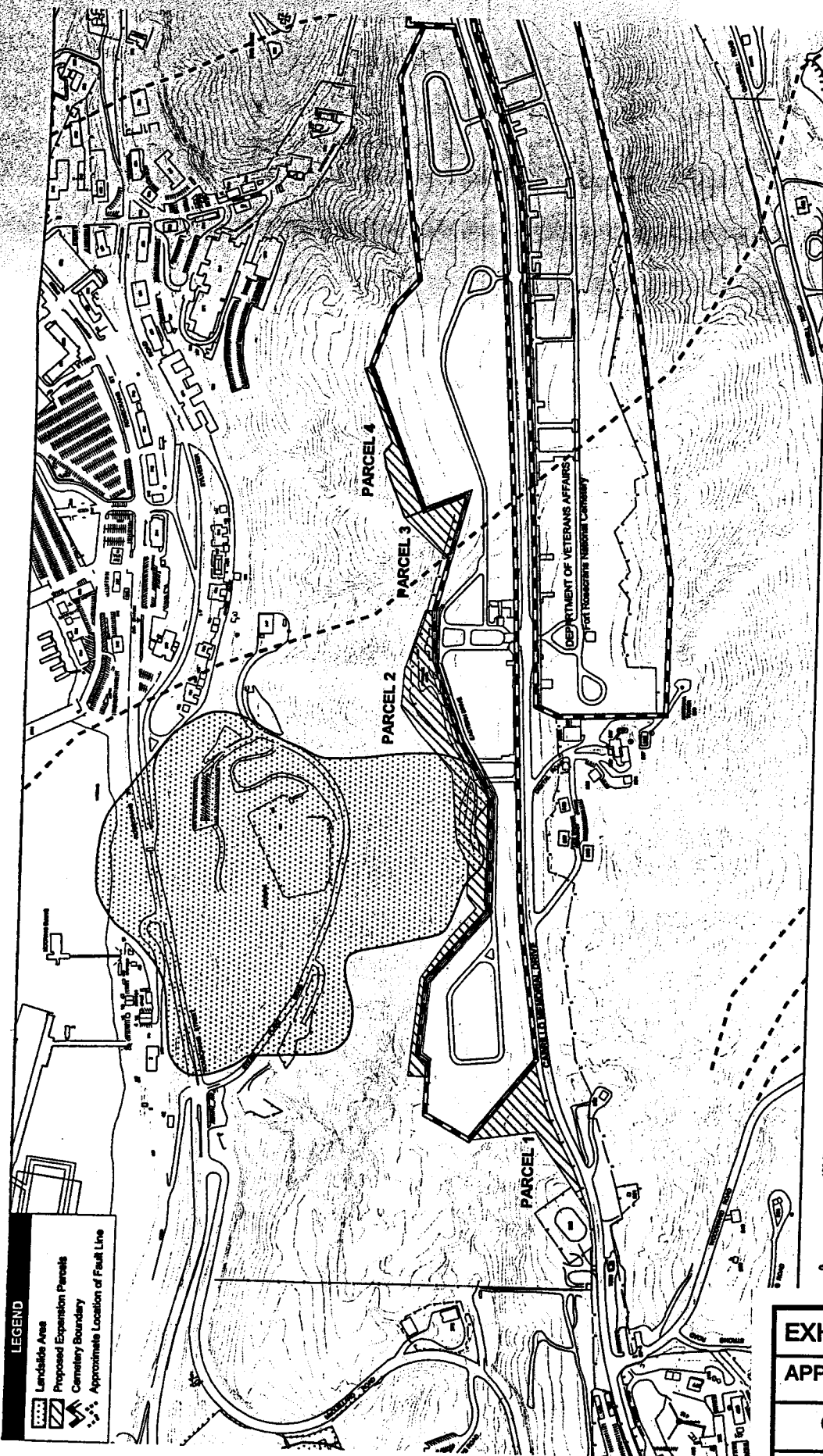


Figure 13  
Geotechnical Conditions

EXHIBIT NO. 12  
APPLICATION NO.

CD-88-02



**MEMORANDUM OF UNDERSTANDING  
BETWEEN  
THE FEDERAL LAND OWNERS AT POINT LOMA, SAN DIEGO;  
CITY OF SAN DIEGO;  
AND  
U.S. FISH AND WILDLIFE SERVICE**

This Memorandum of Understanding (MOU) is entered into by the U.S. Coast Guard, National Park Service, U.S. Fish and Wildlife Service (USFWS), Department of Veterans Affairs, City of San Diego and the following Navy Commands which constitute the Point Loma Naval Complex: Naval Command, Control and Ocean Surveillance Center RDT&E Division (NCCOSC RDTE DIV), Naval Submarine Base (SUBASE), Fleet Combat Training Center (FCTC), Fleet Industrial Supply Center (FISC), and Naval Station, San Diego-Magnetic Silencing Facility (NAVSTA-MSF). It implements a joint Natural Resources Management Plan (NRMP), completed in July 1994, for management of natural resources on Point Loma. The NRMP is hereby incorporated by reference into this MOU.

The NRMP identifies an Ecological Reserve Area (ERA) to serve as long-term in-place mitigation to allow the landowners at Point Loma to meet their missions while complying with environmental laws such as the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). The boundaries of the ERA are shown on attachment 1. The ERA was designed to set aside sensitive biological communities in amounts and configurations that would be viable in the long term on Point Loma. In effect this ensures that the cumulative effects of projects outside the ERA will not significantly impact the sensitive communities protected by the ERA. This will simplify and speed the environmental planning process while providing good stewardship of the sensitive and unique natural resources on Point Loma. By this MOU a Reserve Working Group is established to manage the ERA. This group will consist of representatives of each landowner, and the Reserve Manager. A staff member of the Natural Resources Office of Southwest Division and the USFWS will participate in the Reserve Working Group as non-voting technical advisors. The Reserve Working Group, will designate a Reserve Manager to implement the NRMP.

#### **BACKGROUND**

Point Loma is an important area for conservation of biodiversity in this region. The reserve was designed to protect viable sensitive biological communities and to ensure the long-term existence and perpetuation of these resources throughout the ERA using the concepts of ecosystem management. It is the intent that new construction projects will not be sited within the reserve. It is the intent that implementation of restoration/enhancement activities and dedication of specific land within the ERA will constitute mitigation for any type of projects outside the reserve on Point Loma. The specifics of the mitigation for each project will be identified in the appropriate NEPA or CEQA document.

EXHIBIT NO. 13
APPLICATION NO.
CD-88-02

To date the environmental planning process on Point Loma is simplified by the limited distribution of Federal and State listed threatened or endangered species and their habitats as of the date of the signing of this MOU. Therefore at this time, the major focus of the biological portion of the environmental planning process is the cumulative effects analysis for the rare habitat types that occur on Point Loma. While the ERA proposed in the plan was designed to avoid incremental habitat loss and thereby provide for the conservation of sensitive ecological communities, it was not designed to mitigate for specific federally listed threatened or endangered species. However, by the nature of the reserve design it is anticipated that the designated ERA will provide a certain amount of protection to sensitive species. If species are listed in the future by the USFWS as threatened or endangered, which occur inside or outside the reserve boundaries, an evaluation of the level of protection afforded to those species by the ERA will have to be conducted. After this evaluation the level of mitigation provided by the ERA will be determined. Conservation and mitigation for any impacts will be considered within the context of the Endangered Species Act (1973 as amended).

Although this planning effort is similar in intent to regional ecosystem planning efforts (i.e. Multiple Species Conservation Program (MSCP), and Natural Communities Conservation Program (NCCP)), it is a separate program.

## ECOLOGY OF POINT LOMA

The planning area of the Point Loma peninsula is an approximately 1500-acre headland surrounded on three sides by water. About 900 acres (60%) of Point Loma are currently in natural and disturbed vegetation (table 4-8 of the NRMP). The regional Point Loma NRMP, proposes an ERA designed to protect the biological viability of sensitive ecological communities.

There are eight native ecological communities and two nonnative associations with high wildlife value that are included in the proposed ERA: southern foredunes, southern coastal bluff scrub, maritime succulent scrub, Diegan coastal sage scrub, southern maritime chaparral, maritime succulent scrub/southern maritime chaparral, Diegan coastal sage scrub/southern maritime chaparral, intertidal, Torrey pine forest, and eucalyptus woodland. In addition there are federal and state listed endangered and threatened species as well as locally sensitive species.

## CONSTRUCTION REQUIREMENTS

In order to support the activities of the landowners at Point Loma various construction and maintenance projects are required. With the exception of maintenance of facilities and utility corridors which already exist within the ERA, construction and maintenance will occur outside of the ERA. The effects to biological resources, both direct and indirect, of these projects will be evaluated during the environmental planning process and appropriate mitigation levels established. Mitigation for effects to biological resources from these projects shall primarily be in terms of land set asides within the ERA and funds for

management of that land. The specific land and/or management activity to be counted as mitigation for each individual project will be identified in the appropriate NEPA or CEQA document.

It is understood that there are utility lines and associated equipment located within the reserve and that maintenance of these will be necessary. The effects on the ecological communities of routine access to and maintenance of utility lines and other pre-existing facilities within the reserve will be evaluated using the appropriate environmental planning process such as NEPA or CEQA. Procedures will be developed to minimize or mitigate environmental effects to levels that are insignificant when conducting routine utility maintenance. When emergency repair of utilities is required, attempts will be made to contact the Reserve Manager or, if not available, the technical advisor from Southwest Division to briefly discuss the action to be taken and what can be done to minimize environmental effects. Emergency repairs will be undertaken in a manner consistent with the Endangered Species Act and Clean Water Act when applicable. Mitigation requirements, if applicable, will be determined afterwards. For major repair projects involving replacement of deteriorated utility lines, individual NEPA documents will be prepared, where appropriate.

#### MITIGATION

One of the primary intentions behind the establishment of the ERA is to provide mitigation for projects on Point Loma. The concept is to establish a reserve which will ensure natural community viability and thereby speed project approval in areas outside the reserve. Development of the ERA boundary has involved consideration of currently planned projects and masterplans and coordination with each landowner.

When considering only the projects thus included, the amount of land set aside is in excess of generally accepted mitigation ratios. This is necessary to form an ecologically viable reserve and is needed to ensure that the cumulative effects of projects will not result in the extirpation of ecological communities. Within accepted mitigation ratios, the reserve will serve as mitigation for other projects outside the ERA. The reserve thus will function as a mitigation planning area.

The use of the ERA as a mitigation planning area for project impacts located on Point Loma but outside of the ERA's boundaries allows the attainment of landscape scale ecological goals, namely the conservation of viable natural communities on Point Loma.

Mitigation for projects on Point Loma will have two facets, land set aside and funding of land management within the ERA. Project proponents will attempt to minimize and avoid impacts before using mitigation. For the most sensitive habitats, such as southern maritime chaparral or maritime succulent scrub, mitigation should be in-kind. For others, consideration should be given to allowing enhancement, restoration or preservation of more sensitive habitats. These determinations will be made during the environmental planning process for individual projects.

If one landowner proposes projects which require mitigation in excess of its' land contribution to the ERA, the contribution of other landowners will not be considered mitigation without the expressed written consent of the other landowners. Project proponents with insufficient land in the ERA to mitigate for their project may, with working group consent, fund management on other areas of the reserve as mitigation, provided this is supported through the environmental planning process.

#### **ADDITION OF LAND TO THE ERA**

It may be desirable, even necessary to add land to the ERA in the future. Land additions will be a permanent agenda item at annual meetings of the working group although special arrangements may be made to do so at other times during the year. It is acknowledged that the USFWS would recommend additions of land to the ERA, particularly those identified as biologically optimal or southern maritime chaparral but which have been left outside the reserve, if and when such lands are determined to be nonessential to the mission of the landowner.

#### **REMOVAL OF LAND FROM THE ERA**

While it is the stated intent of the parties of this MOU that construction take place outside of the ERA, it may be necessary for land to be removed from the ERA. If this becomes necessary, the addition of other land, currently outside the ERA will be required. To ensure that there are no adverse impacts to the ERA, the property must have equal or higher ecological value using the criteria established for the habitat evaluation model used in the development of the ERA boundaries. The selection and inclusion of new lands to the ERA would have to meet any applicable regulatory requirements and be approved by a majority of the working group.

#### **ACCESS TO THE ERA**

Access within selected areas of the ERA will be required for operational needs, recreation, and for scientific research and monitoring. Current operational needs are expected to continue uninterrupted; proposed new operational needs must be reviewed by the working group. Continuing actions such as existing security, circulation (road network) and parking, utility systems, cable easements and fire service will be evaluated under NEPA and CEQA and other applicable laws as appropriate. Proposed operational access needs will be addressed at the annual working group meeting and evaluated against reserve goals and objectives. Where conflicts exist, alternative access will be explored. Construction of new roads and utility lines through the ERA, particularly those that result in the loss of sensitive habitat or habitat fragmentation, must be approved by the working group. If endorsed, these projects would be subject to all applicable environmental documentation and permitting requirements.

Current recreational uses are also expected to continue uninterrupted, although the Reserve Manager will monitor and evaluate specific access points. If conflicts exist or arise among recreational activities, Naval security and critical biological resource areas, access may be prohibited and/or re-routed on a permanent or temporary (e.g. seasonal) basis. The Reserve Manager will also evaluate potential, additional access areas for passive recreational activities such as bird watching.

Access for scientific research and monitoring may be authorized by each landowner for projects which occur solely on one ownership. For projects which cross jurisdictional boundaries each affected landowner must agree.

### **SPECIFIC GOALS OF THE PARTIES**

The mutual goals of the Navy, USFWS, City of San Diego, National Park Service, Coast Guard, and Department of Veterans Affairs for the ERA are to:

- a. Accomplish their assigned missions.
- b. Maintain functional ecosystems.
- c. Maintain viable populations of target plant and animal species.
- d. Maintain functional wildlife corridors and habitat linkages between critical biological resources areas.
- e. Maintain the full range of native vegetation communities and successional phases in ecologically significant areas, with a focus on habitats that are viable and of limited distribution in a regional context.
- f. Use best efforts to incorporate the NRMP policies into planning practices and land use decisions.

### **Reserve Working Group**

Upon approval of the Point Loma MOU, a Reserve Working Group will be formed. This working group will consist of representatives of all of the signatories to this MOU and Southwest Division Naval Facilities Engineering Command. Only the landowners will be voting members, Southwest Division and USFWS will not. The working group will meet not less than once a year, at which time landowners will be briefed on reserve management activities, including problems or remedial measures that need to be addressed, potential projects affecting the ERA, proposed projects, proposed additions of land to the ERA, and funding. The Reserve Working Group may meet more often as specific needs arise.

The Reserve Working Group will select a Reserve Manager. The working group may appoint more than one person to serve as joint Reserve Managers. The Reserve Manager may be an existing employee of one of the landowners. The Reserve Manager will implement projects selected and prioritized at the annual meeting by the working group. The Reserve Manager will direct biological management activities, using existing staff and equipment as provided by the parties to this MOU. Some management activities will require expertise not found among the working group. In these cases, Southwest Division's Natural

Resources staff and/or consultants may be required to advise the working group on appropriate procedures and/or implement the activities. In addition the Reserve Manager will provide training to the Navy security forces, which will patrol much of the ERA on authorized activities within and adjacent to the boundaries. Each Navy command will patrol the portion of the ERA within its boundary with existing security forces.

The Reserve Manager will be responsible for the preparation of the annual report of projects accomplished in the previous year for the Reserve Working Group.

## GENERAL LANDOWNER OBLIGATIONS

### Land Use

The landowners agree to include the designated portion of their property in the ERA. The title to this property shall remain with each individual landowner.

### Stewardship Funding

It is anticipated that not all of the funds provided for management will be derived from mitigation for projects outside the reserve. Therefore stewardship funds, such as Legacy Program funds and Agricultural Outlease funds within the Department of Defense, will also be sought, as available, by each landowner for management. Funds expended by each landowner for natural resource management within the ERA, such as for staff time, count as stewardship funding. This is not intended to be a centrally managed fund.

### Access

The landowners will provide access to the Reserve Manager for the purposes of carrying out this MOU.

### Working Group

All landowners will provide a representative to the Working group.

## NAVY OBLIGATIONS

1. The Navy will seek Chief of Naval Operations (CNO) designation as an ERA for the Navy holdings during FY96. This will formally dedicate the portion of the ERA on Navy lands.

2. A staff member of the Natural Resources Office of Southwest Division will serve as a technical advisor for the Point Loma NRMP. The Reserve Working Group, will be responsible for the overall management of the NRMP, including setting priorities for management activities, determining fiscal responsibilities, and recommending budgets, and coordinating between and among the landowners. The technical advisor from Southwest Division may be called upon to chair the Reserve Working Group.

## USFWS OBLIGATIONS

1. The USFWS considers Point Loma critical for preserving biological diversity in the region. The USFWS agrees that implementation of this MOU will minimize the risk of losses of ecosystem functioning on Point Loma through the cumulative effects of project implementation in support of landowner missions.

2. Provide technical support for management and restoration when requested, and subject to the availability of appropriated funds for that purpose.

3. Participate in Reserve Working Group meetings to evaluate the effectiveness of conservation activities and help prioritize future conservation work.

4. Provide a member to the working group and be a cooperator to this MOU.

## TERMS OF AGREEMENT

This MOU is effective for each party when signed by that party and shall extend for a period of 10 years from that date. It is the intent that the MOU will be renewed at the end of 10 years. The MOU can be updated as agreed to by the signatories.

Nothing in this MOU is intended to or shall be construed to abrogate the responsibility of the landowners or the USFWS to comply with applicable laws such as NEPA, CEQA, or the Endangered Species Act.

Any requirement for the payment or obligation of funds, pursuant to this MOU, shall be subject to the availability of appropriated funds, and no provision herein shall be interpreted to require obligation or payment of funds in violation of applicable law, including the Anti-Deficiency Act, 31 USC section 1341 et seq.. In cases where payment or obligation of funds would constitute a violation of the Anti-Deficiency Act, the dates established for requiring the payment or obligation of such funds shall be appropriately adjusted. Nothing in this MOU shall be construed as implying that Congress will, at a later time, appropriate funds sufficient to meet deficiencies.

### Termination

A single party may withdraw from this MOU in accordance with the following procedures. The party desiring to withdraw shall provide written notification to each of the other parties that such measure is being considered. Within 30 days of such notification a meeting among all of the parties of the Reserve Working Group will be held to informally address all concerns raised. If resolution of the concerns is not achieved, the party desiring to withdraw from the MOU shall provide a written notice within 60 days following the meeting stating the reasons why it is withdrawing from the MOU. Once a party has withdrawn the remaining parties will reevaluate the viability of the ERA which may involve rerunning the habitat evaluation model. Based on the result of the viability analysis the remaining parties may decide to terminate the MOU, redefine goals or if viability is not affected continue with this MOU.

## GLOSSARY OF TERMS

**Biological Diversity** - refers to the variation of living organisms, including genetic variation within a species, species and aggregates of species in communities.

**Biologically Viable** - when a population or habitat contains sufficient numbers or acreage and required natural habitat features that it will maintain itself in perpetuity.

**California Environmental Quality Act** - Pub. Resources Code ss21000 et.seq. California law which requires assessment of environmental impact and public review of projects.

**Continuing Actions** - Projects or activities which were initiated prior to establishment of the ERA and which must continue in order for the landowners to meet their missions.

**Ecological Reserve Area** - is a physical or biological unit in which current natural conditions are maintained insofar as possible. These conditions are ordinarily achieved by allowing natural, physical, and biological processes to prevail without human intervention. However, under unusual circumstances, deliberate manipulation may be utilized to maintain the unique feature that the ecological reserve area was established to protect (Navy Real Estate Operations and Natural Resources Management Procedural Manual - NAVFAC P-73).

**Ecosystem** - is the plant community, animal community, and environment in a particular region or habitat.

**Ecosystem Management** - Management of natural resources which draws on a collaboratively developed vision of desired future ecosystem conditions that integrates ecological, economic, and social factors. It is a goal driven approach to restoring and sustaining healthy ecosystems and their functions and values using the best available science.

**Environmental Planning** - This encompasses the effort involved with implementing planning and environmental laws such as NEPA, CEQA, CWA, ESA, CZMA, CAA, NHPA, and ARPA.

**Habitat** - The area occupied by or suitable for occupation by particular plant and animal species. Areas suitable for restoration may be considered habitat for target species.

**Habitat Enhancement** - means to alter existing habitat to add or increase particular natural resource values or functions over those present under natural conditions.

**Habitat Restoration** - means returning natural resources values and functions to an area where they have been degraded by either human or natural factors. Examples of restoration include removal of exotics, and use of native plant species for erosion control.

**In-Kind Mitigation** - Replacement of habitat adversely impacted by a project with the same type and quality of habitat.



**Major Repair Projects** - These are projects which are not routinely scheduled or which have significant impacts which are not easily minimized or mitigated to insignificance.

**Mitigation** - creating, enhancing, restoring, or protecting natural resources in amount and quality to mitigate for a project which causes adverse impacts to them.

**Mitigation Ratios** - Refers to the area of habitat to be created, enhanced, restored or protected per unit area of habitat adversely impacted.

**Multiple Species Conservation Program (MSCP)** - is a comprehensive habitat conservation planning program for 581,649 acres in the southwest portion of San Diego County. The intent of the program is to plan for habitat preservation

**National Environmental Policy Act (NEPA)** - 42 USC ss4321 et seq. Federal agencies must assess, in detail, the potential environmental impact of any proposal for federal action that has the potential for significantly affecting the quality of the human environment. The Act is intended to help public officials and citizens make decisions that are based on understanding of environmental consequences and take action that protects, restores and enhances the environment.

**Natural Resources Management Plan (NRMP)** - A plan for the implementation and maintenance of a balanced program for the management of natural resources. The plan includes all phases of natural resources management applicable to the installation, future requirements, and projects to be accomplished. Plans include management of land, forest, fish, wildlife, vegetation, endangered species, outdoor recreation, wetlands and floodplains and cultural resources as appropriate.

**Natural Communities Conservation Program (NCCP)** - A plan prepared pursuant to an Agreement entered into in accordance with subdivision (a) of Section 2810 (of the Fish and Game Code). The plan identifies and provides for the regional or areawide protection and perpetuation of natural biological diversity, while allowing compatible and appropriate development and growth. Pursuant to Section 2835 of the Fish and Game Code, the department (of Fish and Game) may permit the taking, as provided in the Fish and Game Code, of any identified species whose conservation and management is provided for in an NCCP.

**Nonnative Associations** - Naturalized plant communities composed primarily of non-native species.

**Onsite Mitigation** - is enhancing, restoring, or preserving adjacent habitats in quantity and quality to mitigate for a specific project.

**Rare** - Species or habitats which are uncommon or of limited distribution.

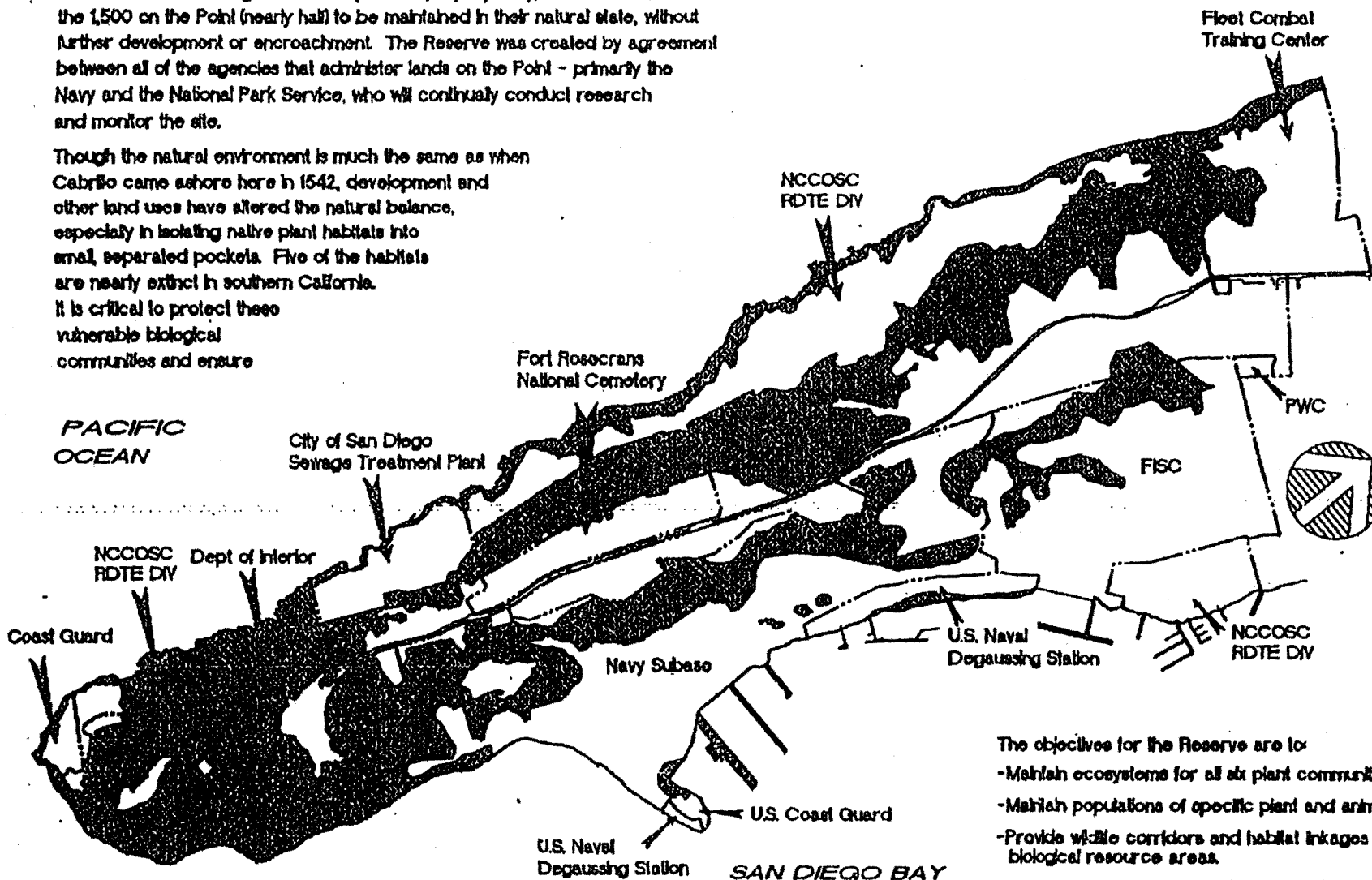
**Routine Maintenance** - This includes maintenance that is required on a periodic scheduled basis which has impacts which are insignificant or that can be minimized or easily mitigated to insignificance.

**Sensitive** - Refers to habitats or species which are rare or have been impacted and fragmented to the extent that their continued existence is threatened.

# THE POINT LOMA ECOLOGICAL RESERVE

The Point Loma Ecological Reserve protects, in perpetuity, 640 acres of the 1,500 on the Point (nearly half) to be maintained in their natural state, without further development or encroachment. The Reserve was created by agreement between all of the agencies that administer lands on the Point - primarily the Navy and the National Park Service, who will continually conduct research and monitor the site.

Though the natural environment is much the same as when Cabrillo came ashore here in 1542, development and other land uses have altered the natural balance, especially in isolating native plant habitats into small, separated pockets. Five of the habitats are nearly extinct in southern California. It is critical to protect these vulnerable biological communities and ensure



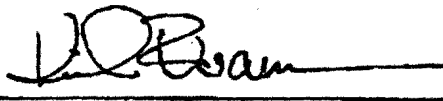
The objectives for the Reserve are to:

- Maintain ecosystems for all six plant communities on the Point
- Maintain populations of specific plant and animal species
- Provide wildlife corridors and habitat linkages between biological resource areas
- Restore the full range of native vegetation communities and their successional phases

MEMORANDUM OF UNDERSTANDING  
BETWEEN  
THE FEDERAL LAND OWNERS AT POINT LOMA, SAN DIEGO;  
CITY OF SAN DIEGO;  
AND  
U.S. FISH AND WILDLIFE SERVICE

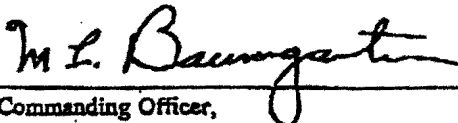
 11/28/95  
Commander, Naval Base San Diego


 11/28/95  
U.S. Department of the Interior

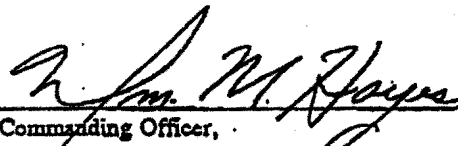
 11/28/95  
Commanding Officer,  
Naval Command, Control and Ocean  
Surveillance Center, RDT&E Division

 11/28/95  
Superintendent  
Cabrillo National Monument

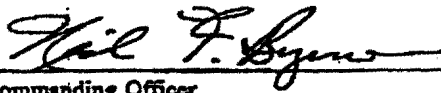
 11/28/95  
Commanding Officer,  
Naval Station, San Diego

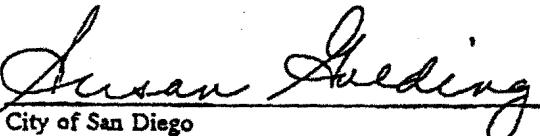
 11/28/95  
Commanding Officer,  
Fleet Industrial Supply Center,  
San Diego

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Commanding Officer,  
Naval Submarine Base, San Diego

 11/28/95  
Commanding Officer,  
U. S. Coast Guard Station, San Diego

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Department of Veterans Affairs

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Commanding Officer,  
Fleet Combat Training Center, Pacific

 11/28/95  
City of San Diego