

CALIFORNIA COASTAL COMMISSION

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



Th6a

Prepared August 9, 2010 (for August 12, 2010 hearing)

To: Coastal Commissioners and Interested Persons
From: Mark Delaplaine, Manager, Energy, Ocean Resources and Federal Consistency Division

Subject: STAFF REPORT ADDENDUM for Item Th 6a

Consistency Determination CD-033-10, Dept. of the Navy, Silver Strand Training Complex, Coronado, San Diego Co.

The Commission staff proposes changes and clarifications to the staff recommendation. [Proposed new language is shown in underline text; language to be deleted is shown in ~~strikeout~~ text.]

Executive Summary, page 6, first and second full paragraphs on page, make the following change:

None of these species' recovery efforts have been sufficiently successful to provide much comfort that species affected can tolerate additional adverse impacts, especially given the above noted, relatively new and confounding threats from predation by gull-billed terns and climate change/sea level rise.

To conclude, five conditions are needed to bring the project into consistency with Section 30240. If agreed to by the Navy, these conditions would result in the Navy agreeing to refrain from using the portions of the three southernmost STCC-N Beach Lanes (Lanes Blue 2, Orange 1, and Orange 2) above the beach crest 20 ft. inland of the high tide line), during the least tern/snowy plover nesting season. The conditions also address the need to: (1) protect all snowy plover nests (not set a cap at 22 nests), with the potential for Commission staff authorization/concurrence of specific instances of nest/buffers removals or relocations *temporarily* to accommodate a necessary training event; (2) assure dog training in the three southernmost STCC-N Beach Lanes, the terms of which are still being worked out between the Navy and the FWS, will not occur until the Commission agrees to the adequacy of the to-be-agreed-upon plan and management measures; (3) avoid training in all San Diego fairy shrimp-occupied vernal pools, year-round; and (4) provide the Commission staff with all monitoring reports prepared for the FWS. If the Navy were to agree to implement these

conditions, the proposed training could be found consistent with the requirement of Section 30240 of the Coastal Act.

Conditions, page 16, Condition 1, make the following change:

1. Limit on Training in STCC-N Beach Lanes 8-10 During Least Tern/Snowy Plover Nesting Season. The Navy will refrain from using the portions of the three southernmost STCC-N Beach Lanes (Lanes Blue 2, Orange 1, and Orange 2) above the beach crest 20 ft. inland of the high tide line), during the least tern/snowy plover nesting season (April 1 – August 30).

ESHA Findings, page 48-49, starting with the last paragraph on page 48, make the following change:

The Commission further finds that none of these species' recovery efforts have been sufficiently successful to provide much comfort that species affected can tolerate additional adverse impacts, especially given the above noted, relatively new and confounding threats from predation by gull-billed terns and climate change/sea level rise.

Based on the above discussion the Commission concludes that the Navy's proposed training expansion into these areas during the nesting season would not protect least tern and snowy plover habitat from significant disruption as required under Section 30240 of the Coastal Act . The Commission is therefore adopting Condition 1 (page 16), which, if agreed to by the Navy, would result in the Navy agreeing to refrain from using the portions of the three southernmost STCC-N Beach Lanes (Lanes Blue 2, Orange 1, and Orange 2) above the beach crest 20 ft. inland of the high tide line), during the least tern/snowy plover nesting season (April 1 – August 30).

Also, attached is additional commitments agreed to by the Navy in its discussions with the Commission staff (based on the Navy/CCC staff meeting dated August 23, 2010) – document titled: “U.S. Navy response to California Coastal Commission staff Recommendation on Consistency Determination No. CD-033-10.” This is followed by letters from:

1. City of Coronado
2. City of Imperial Beach (plus an email)
3. San Diego Audubon Society
4. San Diego Coastkeeper

Following the letters are ex parte disclosure forms.

U.S. Navy response to California Coastal Commission Staff Recommendations on Consistency Determination No. CD-033-10

Below is a follow-up to a meeting held August 3, 2010 in which U.S. Navy and CCC staff met to discuss the Navy's proposed increase in training at SSTC. The information below summarizes meeting discussion and provides further detail on the Navy's natural resources programs and proposed increases in training. Attendees were: Navy – Alex Stone, Jacqueline Rice, Kathryn Ostapuk, Kimberly O'Connor, Tiffany Shepherd; CCC – Mark Delaplaine, John Dixon

I. California Least Tern and Western Snowy Plover Management

The Navy currently has an extensive tern and plover monitoring and management program with the objective of meeting recovery unit goals and ultimately species recovery.

The Navy's current Tern and Plover management at Naval Base Coronado (NBC) includes:

- Annual monitoring throughout the breeding season. The monitoring program includes up to 30 monitors and monitoring is conducted up to 6 days per week during the height of the nesting season. Monitoring includes locating nests, tracking success of each nest, determining whether loss is due to training, recreational disturbance, or predation, and weekly reporting of nest locations and status.
- Site preparation and enhancement through sand replenishment
- Invasive plant species removal
- Predator control (7 days per week at the height of the breeding season) and raptor relocation
- Chick banding
- Adult banding to determine age class. Adult banding studies are being conducted to determine whether Gull-billed Tern predation is impacting age classes represented in the Least Tern colony.
- Photographic and video monitoring to aid in predator management and behavior studies.
- Sites at Delta Beach North, Delta Beach South and MAT are fenced.
- Plover nests protected by mini-exlosures (a small cage that restricts predator access) and buffered up to 30 meters with flexi-stakes
- All nests marked with a numbered wooden marker approximately 2 feet west of nest
- Education and training briefs are given each season to operators, training commands and navy housing and Navy Lodge
- Annual letter signed by NBC's commanding officer is sent to Navy housing residents to describe tern and plover program and restrictions associated with training beaches.
- Annual Navy admin message is sent to all military personnel to describe the nesting season management strategies.

- Bi-monthly bird walk conducted at NASNI to educate visitors, residents, military, and civilians.
- Maps of nest locations are provided to operators and schedulers weekly to allow the lanes with fewer nests to be scheduled when compatible with training requirements.
- Tern and Plover Management Team meeting conducted with monitors, USDA Wildlife Services, Navy natural resources staff, and regulators every other week during the breeding season.
- Navy participates and supports the USFWS and CA State Parks' "Plover Patrol" program, which provides trained volunteers who survey the beach to determine recreational disturbances to plovers and educate the beach-goers about the species. Plover Patrols have been conducted on Navy property since 2009.

-Compatibility of training with tern and plover nesting

Successful tern and plover nesting and military operations and training occur concurrently on NB Coronado. In 2009 within the SSTC-N ocean side training lanes, there were 68 plover and 1093 tern nests; and total nest numbers for all NBC areas in 2009 were 1866 for terns and 134 for plovers. During 2009 total take from military operations was 51 individual terns (40 eggs and 11 chicks) and 0 plovers. To date in 2010, total take is 30 individual terns (26 eggs and 4 chicks) and 3 plover eggs.

The successful balance between training and nesting is a result of the environmental staff working with the schedulers and operators to provide weekly updates on nest locations and marking each nest so when possible they can be avoided.

-Nest buffering

Tern nests have not been buffered in the active training lanes. They are only marked with nest specific wooden markers. These markers are used to track individual nests during monitoring. Currently all Snowy Plover nests are buffered. However, as training increases and the population of Snowy Plovers increases, if each Snowy Plover nest is buffered with a 30 meter buffer this has the potential to make training lanes unusable for certain training activities. To date, the maximum concurrent number of nests for Snowy Plovers at SSTC has been 24 in 2004 and 22 in 2009. For future management, all concurrent nests up to 22 would be buffered and any additional nests in Orange 1 and 2 would be buffered. This limit on buffering will allow the Navy to continue training on the SSTC even as the plover population increases. Also, because a plover nest is not buffered, it does not mean that it will be lost to training. The Navy's level of take has been very low compared to the number of nests in active training lanes. The Navy anticipates the level of take to rise with increased training but the anticipated increase in take will still be only a small percentage of nests.

-Current marking techniques that will be continued for all nests

All tern and plover nests will be marked with a small stake (wood shim) or tongue depressor placed about 2 feet west of the nest. The Navy will continue to mark all nests. This provides opportunity for the operators to indentify that a nest is very close and if it does not interfere with realistic training then they can try to avoid.

-Development of Tern and Plover Habitat Management Plan

The Navy is working with Audubon California to develop a comprehensive habitat management plan for terns and plovers on the SSTC. The plan will outline and establish conservation goals for sensitive dune plants and develop vegetation and substrate management techniques to support nesting terns and plovers. The plan will develop clear management guidelines for vegetation and sand substrate to encourage tern and plover nesting in specific areas on the SSTC and discourage nesting in other areas where it is not compatible with training.

The Navy will work collaboratively with the Coastal Commission during plan development and provide the CCC biologists with an opportunity to review the plan throughout the process.

II. Military Working Dogs (MWD):

- MWD Training Impact Study elements

The purpose of the MWD impact study is to assess the effects of MWD presence on Least Tern and Snowy Plover nest establishment and productivity. The study design will include setting up treatment areas (MWD training/exercising) and control areas (no MWDs) and measuring behavior response and nesting success of terns and plovers. The response will be quantified and analyzed to determine whether MWD's are having a significant impact on tern and plover nesting. Based on the results, the Navy will work to develop conservation measures to minimize and avoid future impacts.

The Navy will work collaboratively with the Coastal Commission during development of the MWD study and provide the CCC biologists with an opportunity to review the study and results.

III. Vernal pools:

- Current Conditions

The vernal pools at NRRF do not support plant communities typical of well-developed vernal pools. During previous floral surveys, no sensitive plant species were found in the pools, though some pools support a few vernal pool indicator species. The pools that are occupied by San Diego fairy shrimp are interspersed with salt marsh vegetation and pools that support brine shrimp (*Artemia* sp.) (RECON 2004, attached). Of the pools that are occupied by San Diego fairy shrimp, pools 1-7 are the least disturbed and appear most natural in configuration and flora. The other occupied pools are much larger and have been affected by anthropogenic features (roads, drainage ditches, and the Wullenweber antenna array) that were constructed prior to the enactment of the Endangered Species Act and federal listing of the San Diego fairy shrimp.

Per our project description, the Navy will minimize the potential for impacts by limiting training to the time period when the pools are dry.

-Staking of Pools 1-7

Since pools 1 – 7 are considered more ecologically valuable and more susceptible to low-level impacts associated foot traffic than the other pools on site, the Navy proposes to flexi-stake pools 1-7 so they can be easily identified and avoided year round.

-Vernal Pool Management and Monitoring Plan

Additionally, the Navy will develop a vernal pool management and monitoring plan that will cover management of all occupied and unoccupied pools on the site. Baseline data will be collected prior to initiating training. The plan will include a focused invasive plant monitoring and visual inspection of vernal pools and their watersheds annually; plant, topographic, hydrological and water quality monitoring every two years; protocol fairy shrimp surveys of the vernal pools every three years. The plan also will include a protocol to determine when pools will be considered dry and available for training. Monitoring results will be used to assess impacts once training in this area is initiated. If impacts exceed those anticipated in the EIS, the Navy would consult with the USFWS and CCC and adjust its management of the pools accordingly. Adaptive management measures may include shifts in training, enhanced invasive species control, modification of the parameters for determining when pools are dry, or other appropriate measures.

The Navy will work collaboratively with the Coastal Commission during development of the plan and provide the CCC biologists with an opportunity for review.



CITY OF CORONADO

1825 STRAND WAY
CORONADO, CA 92118

OFFICE OF THE CITY MANAGER
(619) 522-7335
FAX (619) 522-7846

August 4, 2010

California Coastal Commission
Ms. Neely and Honorable Commissioners
Attn: Mark Delaplaine, Coastal Staff
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: CD-033-10 Consistency Determination for planned expansion of U.S. Navy's Silver Strand Training Complex (SSTC) in Coronado, San Diego County.

Dear Ms. Neely and Honorable Commissioners:

The City of Coronado has received notice of the August 12, 2010, Coastal Commission hearing to be held in San Luis Obispo County to consider the Navy's planned expansion activities for the Silver Strand Training Complex in Coronado. The City supports the U.S. Navy mission and associated training requirements. However, the City believes a delay in the determination is warranted to allow full participation on this matter and for careful consideration of the environmental issues and impacts associated with this project before a Coastal Determination is completed.

In March of 2010, the City provided a comprehensive letter to the Navy regarding the Draft Environmental Impact Statement (EIS) for the SSTC (attachment 1). The City identified concerns with noise, traffic, coastal, recreational, water quality, habitat, and visual impacts associated with the planned expansion activities for Silver Strand Training Complex. Many members of the public and other agencies also provided extensive comments on the project. To date, the Navy has not released its responses to comments and it is uncertain whether or how the project will be modified to minimize environmental impacts to the community.

The City recognizes the NEPA process is separate from the Coastal Determination process; however, in the past, the Coastal Commission has benefited from reviewing comments and responses on an environmental document for a project before making a Coastal Consistency Determination. The City believes the matter should be postponed so that the Coastal Commission is afforded an opportunity to review environmental information pertaining to this project prior to arriving at a conclusion on the project's Coastal Consistency Determination. Additionally, members of the public and agencies



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who expressed an interest and commented on the Draft EIS should be notified of the Coastal Commission hearing on the project.

This project is extremely important to Coronado because of the potential long term impacts on the community resulting from the increased activity and noise levels along the Silver Strand. We hope the Commission considers the issues raised in the attached letter when evaluating the merits of the Coastal Consistency Determination for the project. Preferably, the Commission would delay action on the project until the Navy has provided responses to Coronado's comments on the Draft Environmental Impact Statement so all of the environmental and related coastal issues associated with the Coastal Determination can be evaluated. Without this information, the Commission may not be aware of alternatives or modifications that could be incorporated into the project to reduce impacts to the community, the environment, and its resources.

If the Commission decides to proceed with the Coastal Consistency Determination hearing, the City requests conditions attached to this letter be incorporated into the Coastal action on the permit.

The City appreciates your attention to the environmental and coastal issues associated with the project. Thank you in advance for your consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Blair King", written over a faint circular stamp or watermark.

Blair King
City Manager

Attachments: Suggested Coastal Consistency Determination Conditions
City of Coronado letter on Draft EIS for SSTC

cc: Mayor and Councilmembers, City of Coronado
Gary Brown, City Manager, City of Imperial Beach
Capt. Yancy B. Lindsey, Commander Officer, Naval Base Coronado

**CITY OF CORONADO RECOMMENDED COASTAL CONSISTENCY
CONDITIONS FOR SILVER STRAND TRAINING COMPLEX PROJECT**

1. PUBLIC SAFETY AND NOISE: The project will involve new aircraft flight patterns and helicopter training at Silver Strand Training Complex resulting in increased public safety risks to residents, school populations and beach users along with significant noise level increases impacting endangered species, recreational use and residents within the vicinity of the project area. These concerns are elaborated in items #1-9 and #28-32 of the City's letter on the Draft EIS. The following conditions should be added:

- A. The increased over flight activities and helicopter hovering should be limited to months outside the least tern nesting season and times outside summer months when the City experiences heightened recreational use of its beaches and Silver Strand.
- B. Helicopter and over flight activities should be restricted to 7:00 a.m. to 7:00 p.m., Monday through Saturday to reduce impacts to residents.
- C. In those cases where a special training exercise involves an exception to these hours, the Navy shall notify the public in advance of the training exercise including the days and hours of increased training. The Navy should provide an annual report to the Coastal Commission and the City of Coronado reporting the frequency and duration of extended training operations.
- D. The Navy shall fund and perform noise monitoring during over flight and helicopter hovering activities to establish auditory levels of existing and expanded training activities along the Silver Strand. Monitoring locations shall be coordinated with the City of Coronado and include but not be limited to the Silver Strand State beach and close vicinity to Silver Strand Elementary School. The Navy shall consult with the City, and the City and Navy shall mutually agree upon maximum sound levels. Quarterly reports shall be provided to the City of Coronado and violations of the agreed upon noise limits shall be noted. Navy shall terminate training activities if violations exceed 2.0% of all occurrences. Training activities may only be resumed after corrective measures are taken to prevent such violations. The Navy shall provide a convenient method for the general public to submit complaints of excessive noise. The navy shall make a good faith effort to publicize and make generally known the method to submit a noise complaint.

2. COASTAL ACCESS, COASTAL RESOURCES, WATER QUALITY: The planned expansion of the SSTC raises concerns for the City relative to the public's access and usage of the ocean and beach, water quality issues and added pollution to the beach, and potential beach erosion. These concerns are elaborated in items #36-39 of the City's letter on the Draft EIS. The following conditions should be added:

- A. Offshore anchorage adjacent to Coronado Central Beach shall be prohibited.
- B. Increased use and activities that conflict with the public's current public lateral access along the beach shall be prohibited.
- C. Beach berming activities at NAB immediately south of the Coronado Shores shall be discontinued to minimize associated beach erosion experienced at the Shores beaches due to berming activities.

- D. The Navy shall institute beach clean-up practices where intensified training and tempo activities occur to minimize trash and debris. In addition, as being a good steward of the public's coastal property, the Navy should implement a monthly beach/bay clean-up program.
- E. The discharge of grey or bilge water from Navy vessels shall be prohibited.
- F. Best management practices shall be implemented for all vessel activity to minimize discharge of pollutants and oils into coastal waters.

3. INCREASED PERSONNEL AND TRAFFIC: The project will involve new squadrons and increased training tempo of over 40% within the Silver Strand Training Complex. The City questions the adequacy of the analysis within the EIS that concludes there will not be increased personnel or increased traffic impacts associated with the expanded activities at SSTC. These concerns are elaborated in items #10-24 of the City's letter on the Draft EIS. The following conditions should be added:

- A. The Navy shall reinstitute and provide funding for the commuter ferry service for Navy personnel previously committed to and recently discontinued by the Navy.
- B. Navy will coordinate training exercises with carrier arrivals to minimize increased training tempo activities while expanded personnel numbers are homeported.
- C. Navy will provide van/bus services for squadrons arriving to Coronado for training exercises to reduce the number of increased vehicles on City streets.
- D. Navy will complete a study to evaluate the necessity of an underpass or overpass at NAB due to the increased foot and boat traffic from the bay side to beach side.

4. SCENIC HIGHWAY: The Silver Strand Highway (State Route 75) is a State designated Scenic Highway. The City and Navy have worked cooperatively in the past to provide new nature trails, interpretive overlooks, elimination of overhead utility lines, unnecessary signs, dilapidated training equipment, and other vertical obstructions along the Silver Strand to improve coastal and recreational use and access along the Silver Strand, and assist with Least Tern and Snowy Plover preservation efforts. The project proposes beach sand berming activities which negatively impacts the scenic highway and public view corridors of the ocean. These concerns are elaborated in items #33-34 of the City's letter on the Draft EIS. The following conditions should be added:

- A. The Navy shall return the beach grade to its condition prior to creating sand piles along the west side of Highway 75 south of NAB to Silver Strand Housing to restore the scenic view corridor of the ocean.
- B. An action plan shall be developed by the Navy and submitted to the Coastal Commission and the City of Coronado prior to any berming activities along the Strand to ensure present and future activities do not negatively impact the Scenic Highway in accordance with State Scenic Highway guidelines.
- C. The Navy shall install a cable barrier east of SR 75 to protect Least Tern and Snowy Plover habitat similar to that which separates pedestrian and cyclists from critical United State Fish and Wildlife owned habitat adjacent and south of Coronado on the Bay Shore Trail in-lieu of the chain link fence.



CITY OF CORONADO

1825 STRAND WAY
CORONADO, CA 92118

OFFICE OF THE CITY MANAGER
(619) 522-7335
FAX (619) 522-7846

March 4, 2010

Naval Facilities Engineering Command, Southwest
Attn: Mr. Kent Randall – Silver Strand Training Complex EIS
1220 Pacific Highway, Building 1, 5th floor
San Diego, CA 92132

Re: Draft EIS for Silver Strand Training Complex

Dear Mr. Randall:

The City of Coronado has reviewed the above document and concluded that further information and analyses are required to determine the cumulative environmental impacts associated with the planned activities for the Silver Strand Training Complex (SSTC). Of particular concern are the statements contained throughout the document that the military facilities and/or operations are not expanding; rather, just the frequency; therefore, no environmental mitigation is required.

The draft EIS contains several areas where it acknowledges new operations and new activities will be occurring at SSTC. If more military operations and activities will be occurring at SSTC, then more personnel will be arriving in Coronado, and more vehicles will be commuting to and through Coronado impacting local streets. Not only will the additional traffic lead to impacts to intersections currently at unacceptable Levels of Service, but the overall preferred plan of continued plus new activities and operations will lead to significant cumulative impacts on traffic, noise, greenhouse gas emissions, and the public's access to utilize the waters of the State, which, when considered together, should be mitigated.

Please revise the draft EIS to address the questions and concerns described on the attachment.

Of note is that the draft EIS does not appear to adequately address the expanded activities of the Preferred Alternative and associated traffic, noise, and coastal access impacts to surrounding properties within SSTC corridor, both individually and cumulatively. The draft EIS acknowledges increased noise impacts, durations, and sound levels; however, no mitigation is proposed based upon the assumption that activities currently exist and there will be an expansion over a broader area that will minimize noise impacts. The draft EIS needs to be revised to properly address, analyze, and quantify the items detailed in the list attached to this letter.



Lastly, it was pointed out to the Coronado City Council at their meeting of March 2, 2010, that the citizens of Coronado have not had adequate time to review this document. Given the fact that the plan has been under study since 2001, it would seem appropriate to provide the public with more than 45 days to review such a voluminous document. The City requests an extended public review and comment period for the EIS.

Thank you in advance for reviewing and responding to our questions and requests for further information so the City can adequately determine the scope of anticipated environmental impacts to the Silver Strand corridor associated with the Navy's Silver Strand Training Complex. The City also appreciates your serious consideration of an extended period of time to review the document to allow for full public participation and review of this important study.

Sincerely,



James F. Benson
Interim City Manager

JFB/mlc

Attachment: List of issues to be addressed in the draft EIS

cc: Mayor and Councilmembers
Tom Ritter, Assistant City Manager
Rachel Hurst, Director of Community Development
Ed Walton, Director of Engineering
Scott Huth, Director of Public Services
Ann McCaull, Senior Planner

LIST OF ISSUES TO BE ADDRESSED IN THE DRAFT EIS

1. The draft EIS acknowledges there will be new squadrons, flight patterns and helicopter training occurring at SSTC. The draft EIS fails to identify the location points where the helicopters will take off and the paths of travel to and from the training areas and any increased public safety risks to residents, school populations, and beach users due to the increased amount of flight activity as well as the increased frequency and noise associated with the increased frequency of activity. The draft EIS should address, quantify, and analyze these issues.
2. Section 3.1-12 notes that 80% of flight occurs over the water and aircraft are required to approach and depart from training activities over the water. Is there a map that shows this flight pattern? What is the flight pattern for the remaining 20% including both approach and departure locations? The draft EIS should address, quantify, and analyze these issues.
3. Section 3.1.2.3.1 notes a new activity, N8 Tactical Recovery of Aircraft and Personnel, would involve landing or hovering of helicopters at SSTC-S at nighttime. Where exactly within the southern area of the training complex would this activity occur? How many aircraft, how frequent and for what duration would this occur?
4. Section 3.6-26 discusses Acoustic Impacts associated with the Preferred Alternative. The draft EIS notes sound levels will remain the same but training events producing sound would increase in frequency. No mitigation is proposed. The draft EIS needs to analyze the noise impacts of the increased number of training events both individually and cumulatively.
5. Section 3.6.2.3.2 notes existing aircraft noise is increasing from 778 helicopter sorties per year to 2,220 per year representing a 185% increase. What is the duration and frequency of the sorties? The Amphibious Raid activity is noted to represent the most intense aircraft sound event at SSTC and the frequency of the events would increase to 18 per year. What is the duration of these events? It is not clear from the tables and maps where these activities would be located. An additional activity noted as Tactical Recovery of Aircraft and Personnel (TRAP) notes 5 helicopters could be employed and the activity would occur at night, lasting one to two hours. It does not appear to be identified in Table 2-2 and it is not clear where this activity would occur. Cumulatively, the analyses conclude the types of activities described have occurred over time and the only difference is the frequency and no mitigation is required. If the number of activities, duration of activities, and type of activities increases, the amount of noise will unquestionably increase representing significant changes in noise levels to the area and should be mitigated.
6. How do the planned flight paths for new helicopters (to and from SSTC) align with the current Airport Land Use Study for the military bases? How will these planned/proposed paths affect a study that is currently underway for the NAB and those existing uses within the project boundary?

7. The draft EIS does not identify the flight path and accident potential zones (APZs) areas for the helicopters and aircraft in transit to SSTC. The document references NAVFAC P-80.3 indicating APZ is not required. Provide documentation from the referenced document justify/explaining why none is required.

8. The Acoustic Environmental analysis notes there will be an increase in the frequency of aircraft; increase in amphibious vehicle training; increase with ELCAs and associated pile driving; increase in Breacher activities and use of shotgun blasts. The draft EIS notes while all of these activities will be generating increased noise levels, only the frequency of activity will be increasing; therefore, no mitigation is proposed. Mitigation is identified as the Navy's ongoing process and procedures to notify adjoining agencies/facilities when disturbances will occur. Public notification that noise impacts will occur does not mitigate the noise impacts experienced by students and school officials, residents and tourists.

9. Section 2.3, page 2-27 discusses Alternative 1 as the Navy's Preferred Alternative and is "designed to meet Navy and Department of Defense (DOD) current and near-term operational training requirements." How is "near-term" operational training requirements defined? Is there an estimate for how long these expanded activities, increased training tempos and operations will meet the 100% training needs as identified in the draft EIS? Is this for a period of 5 years, 10 years or longer? If some of the "new" activities and training operations need to be expanded in the future to meet Navy mission requirements, will a supplemental Environmental Assessment be completed?

10. The Purpose and Need section discusses "increased training tempo" from current baseline conditions. This needs to be better defined to be properly analyzed. For example, the baseline tempo of 3,926 activities indicates it is not associated with personnel. The Preferred Alternative indicates an increase in activities approximately 41% to 5,543 activities but there are no associated man hours to correspond to these activities. The draft EIS should be revised to address/clarify increased training tempo of approximately 41% without increased personnel.

11. Section ES 1.3.1 documents the increase of Naval Special Warfare personnel operating on NAB Coronado, equivalent to one additional Sea, Air and Land team. It also documents the realignment of the Explosive Ordnance Disposal groups, which has necessitated expanded use of the Southwest Region training venue, including SSTC. The Marine Corps will also increase the number of personnel cycling through training programs at SSTC. Finally, it discusses new platform, training equipment, and service life extension programs to keep up with current needs. All of the needs correspond to additional personnel training at SSTC but they are not quantified nor are their impacts on the community accounted for in the draft EIS. In particular, what are the impacts to daily traffic as these new personnel travel to and from NBC to participate in this training?

12. The Traffic and Circulation section notes there will be an increase in trips resulting from increased activities and operations; however, it will be less than 2% of the total daily traffic generated. The draft EIS acknowledges Gates 1 & 2 currently experience unacceptable Level of Service. The draft EIS notes that since the increased activity will amount to 2% of traffic, no mitigation is proposed. Any further decrease to the level of service to these intersections should be analyzed and addressed.

13. Section 4.3.14, Page 4-22 Transportation and Circulation cumulative analysis does not adequately analyze the impacts associated with the “increased tempo” of activities proposed with SSTC Preferred Alternative. Where are the estimated traffic generation rates to arrive at the conclusion of a less than 2% increase in traffic? How can an argument be made that since the number of employed are not increasing, therefore, there will be no increase in traffic? What about the new and expanded activities and training planned for SSTC? Where are these “employees” coming from when some of the activities are “new” to SSTC? The document should analyze all the trips associated with the increased training activities including commuter access to/from SSTC/NBC.

14. Table 2.1, Baseline and Proposed Tempos for SSTC Training Activities, identifies 78 training activities along with duration and number of events per year. The document should relate the activities to number of personnel. How many people are training under the baseline and how many will be training under the proposed activities?

15. Table 2-2, Proposed New Training Activities at SSTC for Alternatives 1 and 2, identifies 11 new activities. The document should relate the new activities to the number of personnel. How many additional people will be trained under the new activities compared to the baseline?

16. The draft EIS notes baseline activities will increase from 3,926 activities to 5,343. Many of the new activities are a result of new helicopter training activities such as 200 new mine hunting; 48 new helicopter mine detection; 100 helicopter activity; 48 MH-60s helicopters; 124-154 helicopter rope training; and 109 to 198 Close Quarter Combat with helicopter use. Amphibious Raise (with possible helicopter use) will expand from 6 days a year to 54 activities a year. Perhaps even more significantly, CRRC OTB Insertions and Pyrotechnics will increase from 4 day events approximately 52 times a year to 86 times a year. This change results in almost 365 days per year this activity will occur. The draft EIS does not analyze the cumulative impact of the entire new helicopter activities will have on the air when cumulatively combined. The draft EIS does not contain a section where analysis of combined activities along SSTC can be visualized and analyzed in terms of cumulative activities and noise.

17. Section 3.3.2.1.1, Emissions Evaluation Methodology, discusses emissions from ground vehicles only and should include vehicles involved in the training activities. It should also include all additional vehicles trips to get the personnel to the training (commuter trips).

18. Transportation and Circulation, Page 3.14-4 last paragraph states: The Rendova Road (Gate 1) and Tarawa Road (Gate 2) intersections operate at LOS E during the busiest morning commute hours and Tarawa again operates at LOS E during the busiest afternoon commute hour. This conflicts with Table 3.14-3 which has a LOS F for Tarawa in both a.m. and p.m. peak hours.

19. Transportation and Circulation Page 3.14-5, second paragraph states: The City of Coronado is currently in the process of analyzing traffic conditions for SR-75 to determine the best long-term traffic solutions for the community. This project is actually the SR 75/282 Transportation Corridor Project which is analyzing traffic conditions along the corridor between the bridge and NASNI, not SR-75 adjacent to SSTC.

20. Section 3.14.2.3.1 Ground Transportation indicates under Alternative 1, military training activities are estimated to generate approximately 336 ADTs. The draft EIS should analyze all trips generated from the increased activities and increased training tempo.

21. 3.14-5 Summary of Effects section: Silver Strand at Rendova Road and Silver Strand at Tarawa are signalized intersections with LOS E or worse. All additional traffic generated by the increased activity should be analyzed and the amount of delay calculated in accordance with the SANTEC/ITE Guidelines for the San Diego Region. In addition, there is no mention of the number of pedestrian crossings between the bay side and ocean side of NAB, which affects the signal capacity and causes delay. The document should quantify the number of pedestrian trips across SR-75 that occur and how many more would be expected under Alternatives 1 and 2.

22. 5.13 Transportation and Circulation section does not propose or identify mitigation for the increased transportation and circulation in the proposed alternatives.

23. List of Preparers: A Traffic Engineer was not identified under the list of preparers. Who analyzed the Transportation and Circulation sections?

24. The draft EIS does not identify the potential impacts to the intersections due to increased foot and boat traffic from bay side to beach side. Do the increased activities warrant re-evaluation of an underpass or overpass?

25. Section 5-5 refers to mitigation for underwater detonations and security precautions. When planned activities are underway, will areas of the public beach/water be cordoned off?

26. Section 5-19 notes there is an interpretive sign planned for the bike trail near south Delta Beach. This sign would be located in the Scenic Highway Corridor zone and should be designed to be consistent with the overall Silver Strand Enhancement plan.

27. Table 4-1, Page 4-2 notes future planned improvements for the Navy Lodge. It notes four existing buildings and several smaller structures will be demolished and will be replaced with a lodge building to increase room capacity as well as new recreational facilities, parking, retail shops and a restaurant. What is the approximate square footage of this new facility and net increase in units? Are these additional lodge units to be temporary "resort" type facilities or housing for living purposes as a BOQ or BEQ? Are these additional housing units being proposed to accommodate expanded military operations such as the two new commands at NASNI? The draft EIS further notes in this section that along with the commands, there will be construction of a pier, boat ramp, and several buildings. Where is this project being located and could it also serve as a potential pier/boat ramp to re-instate the ferry service to NASNI that was recently discontinued?

28. Table 4-1, Page 4-3 briefly discusses the U.S. Navy Lighterage project, which involves construction of a waterfront command and control facility for amphibious construction Battalion One facilities to support the introduction of the improved Navy Lighterage System at NBC. The draft EIS does not describe this new system at NBC and should describe the activities associated with the system.

29. Section 4.3.16, Page 4-23 Public Health and Safety cumulative analysis notes there will be momentary disruptions in communication to nearby residences and schools. The draft EIS does not identify how frequently and for what duration. The draft EIS identifies impacts associated with the expanded activities planned for SSTC individually; however, it fails to cumulatively analyze the activities combined to determine the length and period of all activities combined on the residential and school areas. For example, it appears there will be full time operation of the beach lanes at SSTC almost every day throughout the year. Where have those activities – length, time, duration – been analyzed?

30. Table 3-1- states Coronado Beach is the only public beach in Coronado. This statement is incorrect. The Silver Strand State Beach is also located within the City of Coronado.

31. Section 3.6.2.3.3 indicates current Breacher Training operations are 14/day when an event occurs and an event occurs 20 times per year. The draft EIS notes operations will increase to 1,400 annually. How does the increase in activity affect the number of events per year and number per day so an assessment can be made regarding the degree of change on a daily, weekly, or monthly basis?

32. Section 3.6.2.3.4 describes Amphibious Training operations increasing landings from 10,000 to 13,800 per year and LCAC activities (generating the most noise) will increase from 8 to 40 per year. The draft EIS identifies LCAC landings along with associated pile driving that occurs for at least 1 to 2 hours generating decibel levels of 74 to 104, 100' away. The draft EIS notes this activity has the potential to generate the largest number of increased complaints regarding noise and activity levels, particularly due to the proximity of the activity to Silver Strand housing and Silver Strand School. The draft EIS does not propose any mitigation, however, notes the training could result in sleep and communication disturbances. If the draft EIS acknowledges impacts, why aren't mitigation measures proposed? To state the Navy will advise surrounding agencies when potential impacts may occur is simply public notification and does not mitigate the related noise impacts. For example, could changes be made to the school to improve sound attenuation?

33. The draft EIS does not identify the entire Silver Strand as a State Scenic Highway and the Silver Strand (bay to ocean) as a Scenic Highway Overlay zone. The draft EIS should address the potential visual and environmental impacts associated with any new large equipment or improvements that would be visible along the Silver Strand. The City and Navy have worked cooperatively in the past to eliminate unnecessary signs, dilapidated training equipment, and vertical obstructions along the Silver Strand to improve the overall aesthetic improvement to the Silver Strand and assist with Least Tern and Snowy Plover preservation efforts.

34. The draft EIS proposes to institute beach sand berming activities, which negatively impacts the scenic highway and the public use of view corridors. For example, the berming of sand on SSTC has directly impacted the public in the past by blocking sunlight to the Solstice Clock feature in Natures Bridge (Silver Strand's Bayside Nature Trail). In December 2009, at the request of a group of citizens that meet for the winter solstice at this site, the City requested the Navy to lower the berm on December 21 so the sunlight could shine through to the Solstice Clock. The Navy was unable to accommodate this request but did not preclude this request from being accommodated in the future. The draft EIS should address how berming activities will be minimized to avoid the conflicts described in this example as well as other potential berming conflicts along the Strand. This could be addressed through an action plan that identifies how

City and Navy communication will be coordinated and improved to ensure present and future berming activities along the Strand do not negatively impact the Scenic Highway.

35. Several years ago, the Navy bermed up areas on the ocean side of NAB. This activity affected beach sand deposits in front of the Coronado Shores. It has also appeared to accelerate beach erosion at the south end of the Shores. The draft EIS does not address sand movement for training operations and impacts.

36. Figure ES-1 shows anchorage areas directly offshore of Coronado's Central Beach area, which are a direct encroachment into the public's view corridor. There are ample anchorage areas adjacent to Federal (US Navy) property; therefore, there is no necessity for anchorage areas for military craft as shown.

37. Section 3.5.243 of the draft EIS indicates that, if all increased training activities were performed individually, there would be an 85% increase in the amount of time that portions of the bay and/or ocean would be closed to public use. The report also points out that if activities occur simultaneously, that percentage would decrease. Even with that, it is not clear how the public interest is served by this monopolization of ocean and bay use by the military. This proposed increase would have a definite negative impact on public use of these natural resources.

38. The City's beaches are already impacted by trash and other debris from a variety of sources. The draft EIS does not provide for any programs to mitigate the effects of the expanded programs adding to this trash and debris. The City is not aware of any current, ongoing program to clean the Navy's beach areas. The Navy's trash and debris, as well as that from other sources, accumulates on Navy property; tidal action and currents then deposit this trash and debris on public beaches. Expanded training activities will not only disturb buried trash and debris, releasing it into the environment; expanded water-based activities will re-suspend particulate debris deposited on the ocean bed. In summary, expanded training activities will likely lead to an increase in the amount of trash and other debris accumulating on Coronado's beaches in the area. The draft EIS should be revised to address these issues and mitigation.

39. The draft EIS refers to OPNAVINST 5090.1 in several locations; however, this document was not provided as an attachment. Some sections of the report indicate that the discharge of bilge water and grey water is not allowed; other sections of the report seem to indicate that this discharge is allowed under certain conditions. Discharge of grey water and/or bilge water from any Navy vessel in the training area should be prohibited for any reason.

40. The draft EIS describes training activities, which would include the creation of salt water ponds for temperature training. This ponded water would experience human contact for extended periods of time. Any ponded water used for this type of training should be tested to ensure that it meets established water quality standards prior to release back to the ocean and/or bay. The draft EIS should be revised to address this issue.

41. The draft EIS should further discuss, explain and analyze the permit for reverse osmosis water purification and unit discharge into the Bay and Ocean as discussed in Chapter 6 of the draft EIS.

42. In the course of describing training activities, the draft EIS indicated that some running exercises would be performed with military working dogs traversing beach areas. Dogs are prohibited on the City's beaches, except for the area designated as Dog Beach, located at the northwest end of the City's Central Beach, near the Air Station's Ocean Boulevard gate.

Mark Delaplaine

From: Greg Wade [GWade@CityofIB.org]
Sent: Thursday, July 29, 2010 2:13 PM
To: Mark Delaplaine
Cc: Gary Brown; Jim Janney; Jim King (jimkingforib@gmail.com); dianehomeloans@yahoo.com; mccoy4ib@aol.com; LorieBraggib@aol.com; Jim Nakagawa; Diana Lilly
Subject: Comments Consistency Determination for Expanded Training Activities at the Navy's Silver Strand Training Complex (SSTC)
Importance: High
Attachments: Ltr to Kent Randall City comments re Navy Silver Strand Training EIS.PDF; Ltr to Kent Randall Additional comments Training complex 3-30-10.pdf

Mark ~

Please see the attached comment letters from the City of Imperial Beach on the Draft EIS associated with the above-referenced Consistency Determination. The City of Imperial Beach would like to include these comments for the record for consideration by the Commission during their review of this Consistency Determination. In addition, the City of Imperial Beach would like to express its concern that this Consistency Determination has been scheduled in advance of any response to comments received by the Navy on the Draft EIS for the expanded training activities at SSTC. Furthermore, we are also extremely concerned that this item has been scheduled for review by the Commission well outside of the jurisdiction most affected by, and within which the expanded training activities are proposed.

As such, the City of Imperial Beach respectfully requests that the Commission continue this matter to the Oceanside meeting scheduled for October 13-15, 2010, to ensure that all written responses to the Draft EIS have been formally and appropriately addressed and, if necessary, mitigation measures proposed, and, most importantly, to allow the communities, agencies and constituents most affected by the proposed expanded training activities the most reasonable opportunity to attend the meeting and address the Commission during consideration of this Consistency Determination.

Thank you.



Greg Wade
Community Development Director
 City of Imperial Beach
 Community Development Dept.
 825 Imperial Beach Blvd.
 Imperial Beach, CA 91932
 Phone: (619) 628-1354 - Fax: (619) 424-4093
gwade@cityofib.org - www.cityofib.com

Information from ESET NOD32 Antivirus, version of virus signature database 5324
 (20100729)

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

8/9/2010



City of Imperial Beach, California

OFFICE OF THE CITY MANAGER

March 5, 2010

Mr. Kent Randall
Silver Strand Training Complex EIS
Naval Facilities Engineering Command, Southwest
1220 Pacific Highway, Building 1, 5th Floor
San Diego, CA 92132

Dear Mr. Randall:

The City of Imperial Beach appreciates the opportunity to review and comment on the environmental document that assesses the potential impacts of the Navy's proposal to provide increased operationally and realistic training for naval personnel at the Silver Strand Training Complex (SSTC).

The City also appreciates the national security role that the Navy provides for the country. However, the City suffers fiscally and economically in not being able to fully exploit our beach-oriented resources for our tourist industry. The City has embarked upon an aggressive redevelopment program to enhance this economic base and make overall quality-of-life improvements to the City. The City is apprehensive that increased military activities in our area might result in impacts that would work against the City's efforts to provide an attractive and quiet environment in which to live and work. We believe that we can work together in mutually achieving the City's goals and the Navy's mission to provide adequate training for our military personnel. It is in this spirit that we offer the following comments on the environmental document:

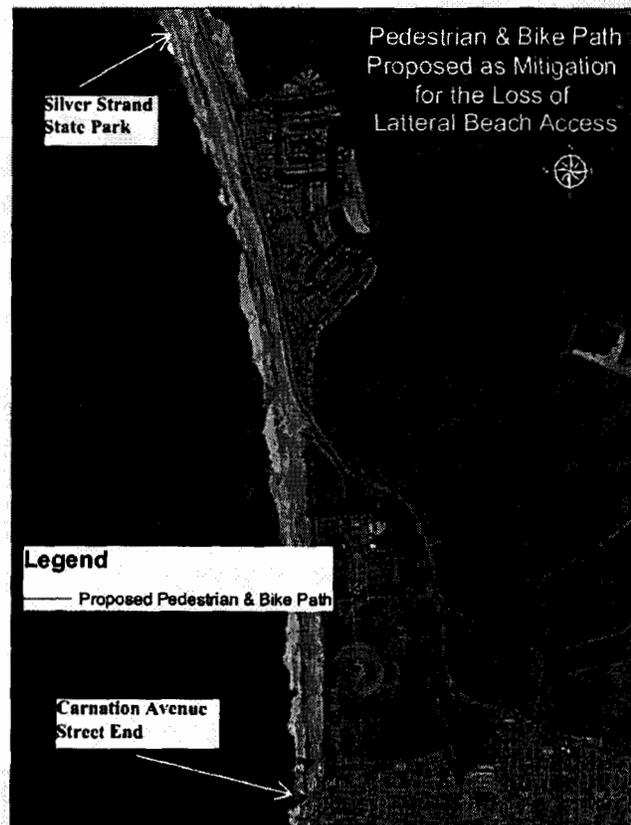
1. Due to limited staff and time, our review was not as thorough as we wished. Also given the length of the document and approximately a decade it took to prepare, we request an additional review period of 45 days.
2. The DEIS does not adequately allow a reader to assess the current and proposed activities within each lane and thus it's difficult to distinguish the impacts in the southern zones from the northern ones, and the changes from current to proposed activities.
3. With the increase in aircraft activities and firearm discharges, we request that helicopter sorties and firearm discharges stop no later than 10:00pm and start no sooner than 7:00 a.m.
4. In light of the decrease in beach access due to the increase of training activities, we suggest three mitigation steps:
 - a) The Navy create an alternative pathway running from the general vicinity of the western end of Carnation Street heading in a northeasterly direction along the perimeter of the southern boundary of the base (roughly the northern boundary of IB) to the eastern boundary of the base that parallels SR-75; then proceeding northward on an existing path

currently available to the public until the path ceases a bit south of the Cays; then proceeding in a northwesterly direction on Navy property to connect with Silver Strand State Park. This would provide walkers, joggers, runners, bicyclists a north-south pathway/trail to mitigate for the loss of beach access.

- b) People also walk their dogs along the part of the beach that will be greatly affected by the increased training, and therefore we suggest that the Navy create and maintain a "dog park" somewhere along the southern perimeter of the base somewhere east of Camp Surf. (The Navy had allowed the public to use an area just east of the entry gate on Silver Strand in IB as a dog park. The area is now closed to the public, but it is a possible site to mitigate the impact of the training activities that reduce access to the beach.)
- c) The Navy should assist in funding beach sand replenishment efforts. For example, the Navy could help the Corps of Engineers with dredging the entry to San Diego Bay and placing the dredge materials (sand) nearshore or on the beach along the coast of Imperial Beach. The City prefers that sand be placed onshore because this is the best way to preserve our beaches. Preserving the beach between Carnation Street and the mouth of the Tijuana River would be a measure that mitigates the reduced beach access caused by the increase of naval activities along the Silver Strand north of Carnation.

4. In light of the overall increase in noise due to helicopter activities, firearms and other training activities, mitigation activities should include:

- a) Strict adherence to flight patterns at Ream Field that will not allow fixed-wing and helicopter flights over homes in Imperial Beach.
- b) There should be no helicopter training at Ream Field after 9:30pm. All flights should be heading back to their home base after 9:30pm.
- c) Work with the City in developing a more effective notification system of planned training activities that have the potential to impact residents of Imperial Beach (in addition to the standard notification provided to our Public Safety Department when exercises involve pyrotechnics or firearm discharges).



5. Table 3.6-9 indicates that Camp Surf is situated further away from the noise source than the residential areas of Imperial Beach when the other tables show Camp Surf closer to the noise source than the Imperial Beach residential areas. Please explain.

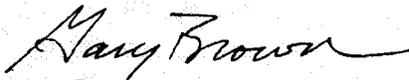
Table 3.6-9: Sound from Blanks used during Immediate Action Drills

Sensitive Receptor	Approximate Distance (feet/m)	Sound Level (dBA)	
		Peak	One-Hour L_{eq}
Coronado Shores	5,950 / 1,810	74	67
Rendova Housing	2,260 / 690	83	75
Military Family Housing / Silver Strand Elementary School	5,370 / 1,630	75	68
Coronado Cays	13,110 / 3,990	68	60
Silver Strand State Beach	10,390 / 3,160	70	62
Coronado Cays	2,560 / 778	80	72
Silver Strand State Beach	890 / 271	80	72
South Bay Biological Study Area	8,790 / 2,672	81	73
YMCA Camp Surf	16,520 / 5,022	77	69
Imperial Beach Residential	13,820 / 4,201	75	67

Note: Peak noise levels and L_{eq} 's estimated from reference sound level of 99 dBA at 350 feet and the source-receptor distances shown above, assuming distance attenuation of six decibels per doubling of source-receptor distance for a point source.

Again, we extend our appreciation for your outreach efforts to involve our community in being able to comment on this document.

Sincerely,



Gary Brown
City Manager
City of Imperial Beach

cc: file
City Council
Greg Wade, Community Development Director
Jim Nakagawa, City Planner
Jim Benson, City of Coronado



City of Imperial Beach, California

OFFICE OF THE CITY MANAGER

March 30, 2010

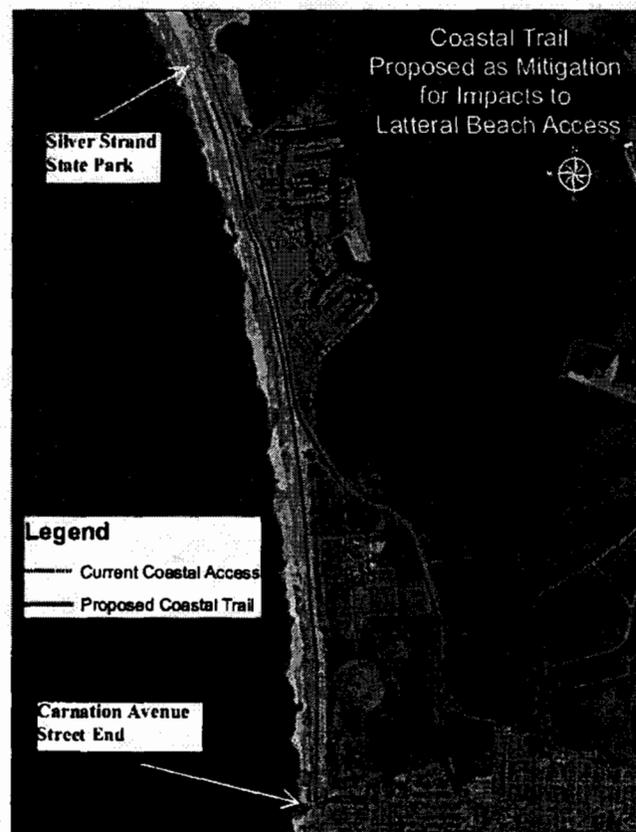
Mr. Kent Randall
Silver Strand Training Complex EIS
Naval Facilities Engineering Command, Southwest
1220 Pacific Highway, Building 1, 5th Floor
San Diego, CA 92132

Dear Mr. Randall:

The City of Imperial Beach appreciates the additional time the Navy has afforded the public to review and comment on the environmental document that assesses the potential impacts of the Navy's proposal to provide increased operationally and realistic training for naval personnel at the Silver Strand Training Complex (SSTC).

The City offers the following additional comments on the environmental document:

1. The City of Imperial Beach concurs with the comment by the City of Coronado that the DEIS does not adequately address the increased environmental impacts to surrounding properties that would result with the proposed activities. While the DEIS acknowledges that the preferred plan will result in increased impacts, additional or more effective mitigation measures are not proposed to reduce the impacts preferably to a level of insignificance. The lack of mitigation measures despite the major increase in activities and impacts seems, at best,



illogical. Mitigation measures are necessary to reduce the significant impacts resulting from the increase in quantity and types of activities proposed.

2. The City also wishes to modify our previous comment of our letter of March 5, 2010 wherein the City proposed a pedestrian and bicycle path from Carnation Avenue to Silver Strand State Park. We would like to refer to this path as a "Proposed Coastal Mitigation Trail" due to the potential loss and/or adverse impacts to the existing and long-utilized beach access along the shoreline adjacent to the Navy Radio Receiving Facility (NRRF).
3. We request that the Draft EIR carefully analyze the impacts the increased activities will have on traffic on SR 75 and Palm Avenue to Interstate 5.

Again, we extend our appreciation for being able to provide additional comments on this document.

Sincerely,


Gary Brown
City Manager

cc: file
City Council
Greg Wade, Community Development Director
Jim Nakagawa, City Planner
Jim Benson, City of Coronado



City of Imperial Beach, California

OFFICE OF THE CITY MANAGER

June 15, 2010

Command Officer
Captain Yancy Lindsey
Department of Navy
Commanding Officer
Naval Base Coronado
P.O. Box 357033
San Diego, CA 92135-7033

RE: Proposed Alignment of the California Coastal Trail through the Tijuana

Dear Captain Lindsey:

The California Coastal trail (CCT) has the potential to become one of the great trails of our nation. Once completed, it will extend 1,200 miles from the Oregon to the Mexican borders. Although informal trails along the coast of California have been used for centuries, the history of the CCT began in 1972 when California passed Proposition 20 that recommended a trail system be established along or near the coast. Of the 1100 miles of coastline, about 50% of the CCT is available and is being used by thousands of people every day. In San Diego County, no precise alignment exists, but its regional planning agency, the San Diego Association of Governments (SANDAG), has a preliminary study under way to identify its possible routes.

Almost a year ago, City and County government representatives walked through parts of Coronado, Imperial Beach and South San Diego to determine where trails currently exist and how new trails might be created to facilitate implementation of the CCT in southern area of San Diego County. Two of the most crucial segments of the CCT in the South Bay would be those through the Tijuana River National Estuarine Research Reserve (TRNERR) and through or along the Navy Radio Receiving Facility (NRRF).

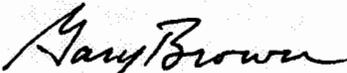
Currently, there is an existing trail skirting the western boundary of the Naval Outlying Land Field (NOLF). In order to continue the trail through the Estuary and across the Tijuana River, we believe the most logical route would continue along a strip of NOLF property beginning at the southwestern corner of NOLF and proceeding eastward to an area just north of Duck Pond Loop, where it would then cross the river and connect to the Tijuana River Valley Trail System. This portion of the trail, of course, would require an easement from the Navy for the use of NOLF property.

Also established is the Bayshore Bikeway, much of which constitutes a well-defined portion of the CCT. At several locations along Silver Strand, there is direct access from the Bayshore Bikeway to Silver Strand State Beach. Moving to the south, however, the Bayshore Bikeway begins to lose contact, both physically and visually, with the coast. There is the potential, however, to develop a portion of the CCT along the eastern boundary of NRRF property where, today, an existing dirt road is located. This part of the CCT could then be connected across southernmost portion of the NRRF to Silver Strand Way in Imperial Beach and, subsequently, to Seacoast Drive. Once again, this portion of the trail would require an easement from the Navy.

While the Navy was not represented during the August 2009 walkabout, there was nevertheless an understanding that the Navy might have concerns about the proposed location of the CCT on Navy property, both from a security standpoint and regarding the protection of natural resources within and on Navy property. As such, City, County, TRNERR, and Fish and Wildlife representatives would like to request a meeting with the Navy to visit and discuss the specific areas of Navy property upon which we are requesting your consideration of, and proposing the placement of the California Coastal Trail.

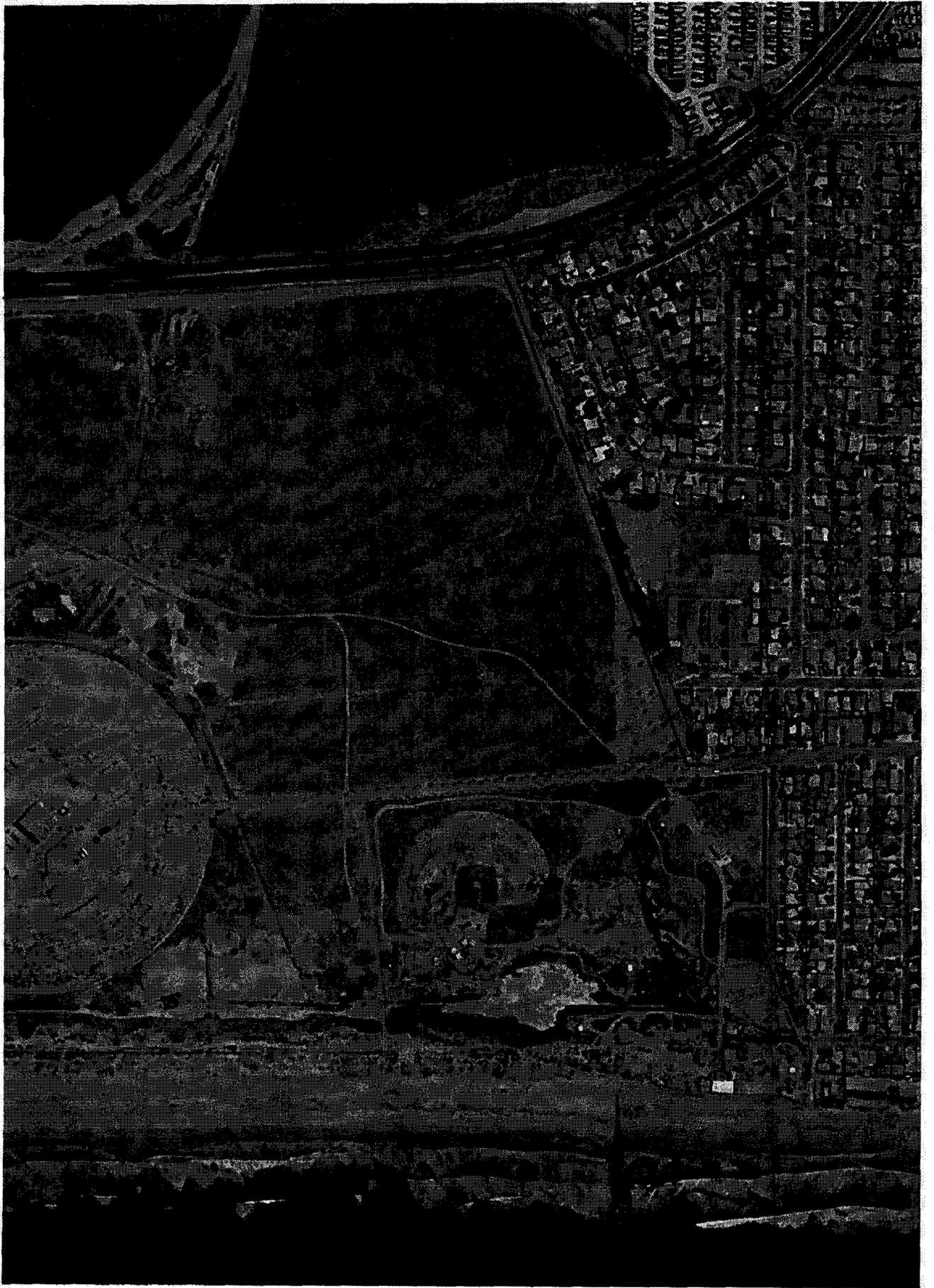
Thank you in advance for your consideration. If you would like to discuss this with me, please contact me at (619) 423-8303. Enclosed are several maps of the California Coastal Trail relative to the NOLF and NRRF properties along with possible trail routes.

Sincerely,


Gary Brown
City Manager
City of Imperial Beach

cc: City Council
Greg Wade, Community Development Director
Elizabeth Cumming, Assistant Project Manager
Carl Bruce Shaffer, NAVFAC Southwest Community Planner/Liaison
File

Attachments



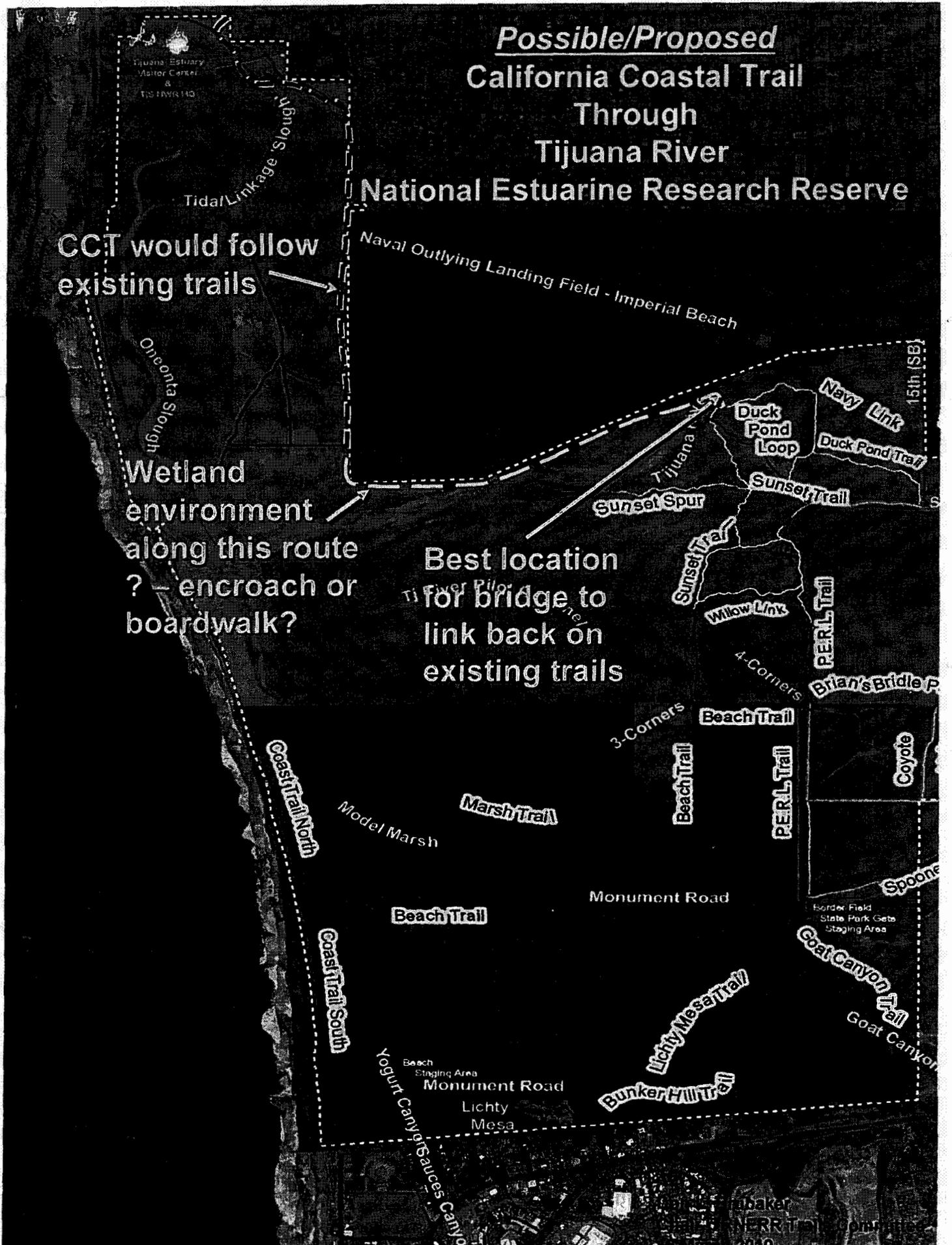


Possible/Proposed
California Coastal Trail
Through
Tijuana River
National Estuarine Research Reserve

CCT would follow existing trails

Wetland environment along this route? — encroach or boardwalk?

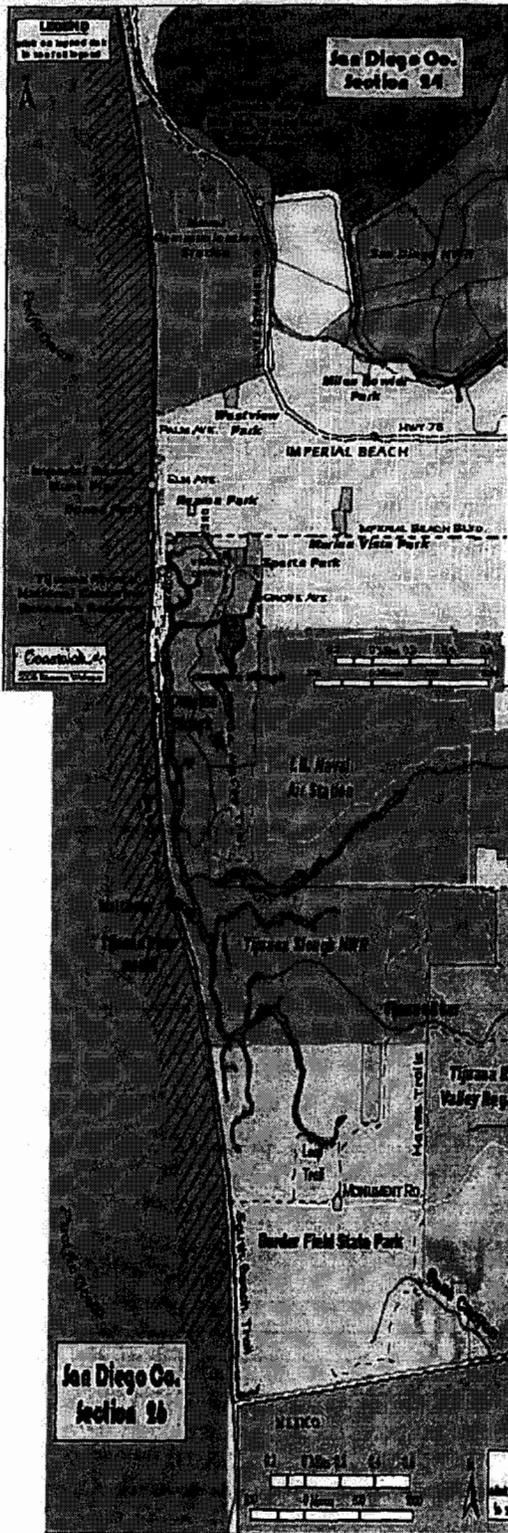
Best location for bridge to link back on existing trails



San Diego Section 24

BACK TO STATE MAP BACK TO COUNTY MAP PREV NEXT

Trail Section Notes



California Coastal Trail (CCT) relative to Tijuana Slough NWR, Border Field State Park, and Tijuana River National Estuarine Research Reserve.

Hiker's Guide

Introduction

The Hiker's Guide provides maps of the Coastal Trail (CCT) and information for hikers and visitors to the California coast.

On the map at right, click on a county name or use the pull-down menus below it. County by county, there are detailed maps - in sections of 3-4 miles - for the entire coast. Note that the counties with long coastlines have been divided in two. On some of the detailed maps, further information and photos are available by clicking the large, colored icons. (See Sonoma, Orange and L.A. West and South county maps.)

N.B. The Coastal Trail alignment shown on these maps has not been sanctioned by any agency of the State of California.

Most current browsers (e.g., Internet Explorer and Netscape versions 5 and later; Firefox, and Safari (Mac)) will work to display these features.

When complete - a few years away, there will be information about public facilities and access to the coastline at 1000+ points, and through photos and data of the CCT, a view of our coastline's every inch (well, perhaps). This is a project of Coastwalk volunteers and staff. [Click for more information.](#)



[Click Here To See the Legend](#)

Select a county...

Select a county by clicking or via the pull-down



[View Big](#)

Proposed California Coastal Trail



Legend

— Proposed Coastal Trail



Fostering the protection and appreciation



of birds, other wildlife and their habitats. . .

March 30, 2010

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Via email: dlee@coastal.ca.gov

SUBJECT: Navy Silver Strand Training Complex, Consistency Determination, Item TH 6a

The San Diego Audubon appreciates the success that the Navy has had in managing nesting areas for California Least Terns and Western Snowy Plovers so far. But we are very concerned with the environmental impact of the proposed project. In its current configuration it is clearly not consistent with the requirements of Section 30240 of the California Coastal Act. We urge that the item be postponed and heard by the Commission in the San Diego area where local stakeholders can attend and participate in the hearing.

We have concerns with the list of conditions that are required to make the project consistent with the California Coastal Act, on Page 6 of the Executive Summary and in the Conditions in pages 16 and 17 and urge that the following suggestions should be included.

- We urge that the avoidance and marking of the three lanes, Blue 2, Orange 1, and Orange 2 when terns or plovers are nesting in them must continue. In view of the many threats to these species such as habitat loss, fluctuating levels of fish available for foraging, increased predation, and the effects of global climate change these species are already in jeopardy of extinction. The Navy's assertion that such a loss is not expected to preclude recovery is totally unsupported.

- We fully agree that all Snowy Plover Nests must be marked and projected, not just 22 of them.

- We agree that the adequacy of dog training and handling must be fully demonstrated before dogs are trained in or near the nesting areas. But, the terns do not know that the dogs are trained and they may either avoid nesting in this prime nesting habitat or abandon nests or chicks due to the presence of the dogs. This avoidance would be an uncountable "take" of these birds. We urge that the condition be expanded to require that rigorous behavioral studies be performed to identify what impact dog handling activities will have on the terns and plover selection of nest sites, on nesting, and on nest and chick abandonment, and at what distances will or will not these impacts occur. Without definitive behavioral studies, the Navy, the Fish and Wildlife Service, and the Coastal Commission will not know what the impact of the dog training will be on nesting success. The dog training in nesting areas should not be allowed until these impacts are quantified and measures to minimize and mitigate them can be identified.

- We fully agree that training must not be allowed in vernal pools that contain San Diego Fairy Shrimp, wet or dry.

- We fully agree that the Commission staff should receive all monitoring reports.

In case of questions or follow-up, the undersigned can be reached at 619-224-4591 or peugh@cox.net.

Respectfully,

James A. Peugh
Conservation Committee Chair



August 5, 2010

Agenda Item: Th6a
Project #: CD-003-10
Gabe Solmer, Legal Director
San Diego Coastkeeper®
In opposition

TEL 619.758.7743
FAX 619.224.4638

ADDRESS 2825 DENVER ROAD, SUITE # 200
SAN DIEGO, CALIFORNIA 92106

WWW.SDCKOASTKEEPER.ORG

IMPACT

Bonnie Neely, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: Silver Strand Naval Training Complex Staff Recommendation on Consistency Determination

Dear Chair Neely:

San Diego Coastkeeper respectfully submits the following comments on the Navy's consistency determination and staff recommendations regarding the expansion of training activities at the Silver Strand Training Complex and the southern shore area of Naval Air Station North Island. San Diego Coastkeeper is an environmental non-profit dedicated to the protection and restoration of regional coastal waters. San Diego Coastkeeper protects the region's inland and coastal waters for the communities and wildlife that depend on them by blending education, community empowerment, and advocacy.

San Diego Coastkeeper respectfully requests that the California Coastal Commission **postpone hearing the U.S. Navy Consistency Determination for the expansion of training activities at the Silver Strand Training Complex (Agenda item Th6a) until October, when the commission will be meeting in Oceanside.** This two-month delay will not burden or prejudice any party, and would provide San Diego community members an opportunity to voice their opinions. Hearing this matter in San Luis Obispo would discourage San Diego community members from participating in the hearing process. Hearing this matter of local and state-wide importance in San Diego County would provide the widest opportunity for public participation. See California Public Resources Code § 30006.

San Diego Coastkeeper appreciates the Navy's need to train the men and women that serve and protect our nation. However, San Diego Coastkeeper has serious concerns regarding the Navy's plan to expand the scope and frequency of training activities at the Silver Strand Training Complex and the impacts of this increase on the local community and environment. The Navy plans to vastly expand training activity and frequency. The proposed expansion is a 36% increase of training activities from 3926 a year to 5343. In total, water training activities would increase by 59% and land activities would increase by 28%. See Staff Recommendation page 1. Despite the conditions recommended by staff to protect and preserve endangered species the Navy's plan has serious long-term negative impacts to water quality and public access to the ocean, bay, and beaches.

I. The Staff Recommendation Generally Protects Endangered Species and Sensitive Habitats.

San Diego Coastkeeper applauds staff for recognizing the significant risks that increased training will pose to the vulnerable least tern, snowy plover, and San Diego fairy shrimp. Staff has recommended conditional concurrence based on five conditions. (1) Limit and forbid training in critical nesting lanes during nesting season; (2) Mark all nesting and buffer areas and limit the removal of markers and nests; (3) Limit dog training until Coastal Commission has opportunity to review and concur with pending joint Navy and Fish and Wildlife study; (4) Prohibit training in vernal pools; and (5) Provide



TEL: 619.758.7743
FAX: 619.224.4638

ADDRESS: 2825 DEWEY ROAD, SUITE # 200
SAN DIEGO, CALIFORNIA 92106

WWW: www.sdcoastkeeper.org

IMPACT

the Commission a copy of monitoring reports prepared for Fish and Wildlife July 7, 2010 Biological Opinion. The staff recommendations place important conditions to ensure that the plan is consistent with Sections 30230 and 30240 and protects endangered species and sensitive habitats. It is vital that these conditions regarding endangered species and sensitive habitats are adopted and enforced.

II. The Staff Recommendation Fails to Account for Anticipated Water Quality Impacts From Increased Smoke Grenades, Flares, and Surface and Underwater Detonations.

The navy's proposed ramp up of training involves a significant increase in the amount and frequency of hazardous discharges to waters. For example, the Navy plans to increase the use of smoke grenades and flares from 2,990 pounds to 4,410 pounds. Currently 1,610 lb of explosives are used each year in surface and sub-surface detonations. See Staff Recommendation page 64. These munitions contain aluminum, magnesium, strontium, barium, cadmium, nickel, and perchlorates. Additionally, there is potential for discharges of fuels, engine oil, hydraulic fluid, batteries, anti-corrosion coating, and anti-fouling paints which contain copper.

The Navy has concluded that discharges of petroleum products and residue from munitions would be negligible. Staff has concurred with the Navy's conclusion that dilution in the Pacific Ocean and coastal currents is a sufficient solution to pollution. However, this fails to consider the long-term and cumulative impacts of pollution in the Pacific Ocean and San Diego Bay. The bay is especially vulnerable because portions are already impacted and it lacks sufficient tidal flow to disperse pollutants. The Navy has failed to analyze the impacts of doubling the number of munitions and a 36% increase in training activities on water quality. Even trace and residual pollutants can be of significant concern.

To be consistent with Section 30231 the Coastal Commission should impose conditions to limit the increase of vehicle traffic and detonations and require the Navy to monitor water quality after major training exercises and underwater detonations.

III. The Navy's Proposed Plan Will Further Interfere With Public Access to the Beach, Ocean, and Bay.

One of the five primary goals of the California Coastal Act is to maximize public access to and along the coast and to maximize recreational opportunities in the coastal zone. See California Public Resources Code § 30001.5. The proposed drastic increase in the scope and frequency of naval training will severely impact public access to beaches, the bay, and ocean. The Navy plans to close beaches and coastal regions for 7,500 hours, or approximately 312, days a year. See Staff Recommendation page 61.

Further, the Navy's proposal and staff recommendations do not address how many hours of beach closure will occur during daylight hours or during peak daily and seasonal public use and recreation times. San Diego receives approximately 3,000 hours of sunlight per year.¹ Therefore, if the Navy were to close beaches for 7,500 hours per year it could effectively restrict public access during all daylight hours. Additionally, training activities such as Immediate Action Drills could close adjacent beach lanes for up to 8 hours. Staff Recommendation page 62.

The Navy's Consistency Determination and the Staff Recommendation also fail to provide any meaningful estimates of current public beach, bay, and ocean usage in the Imperial Beach, Silver Strand, and Coronado municipal areas. It is crucial to understand shore and near-shore recreational usage to properly understand the impacts of beach and water closures. For example, the City of Imperial Beach estimates that along its 3.5 miles of beachfront, there were 1.8 million beachgoers, 8,000 beach anglers, and 400 boats providing 10,000 fishing trips. See Silver Strand Training Center

¹ See http://www.bbc.co.uk/weather/world/city_guides/results.shtml?tt=TT001510



Draft Environmental Impact Study at 3.5-18. By ignoring the best available data the Navy has downplayed the impact the proposed project will have on access to the ocean and bay. Ultimately, the Navy and Staff have failed to analyze the cumulative impacts the expansion will have on public access and recreation.

To be consistent with Sections 30001.5, 30210, and 30530 the Coastal Commission should impose conditions to allow the public the maximum safe access to beaches and recreational water during daylight hours.

Conclusion

The Coastal Commission should delay hearing the expansion of the Silver Strand Training program until its October hearing to allow the widest opportunity for public involvement in this proposed expansion of activities that will significantly impact wildlife, sensitive habitat, water quality, and public access. While staff has recommended important limitations to protect endangered species and nesting sites the staff recommendations do not address the significant impacts to water quality and public access. The frequent beach closures and increased restrictions to coastal access proposed by the Navy are not consistent with the spirit of the Coastal Act. Additionally, the Navy's consistency analysis of long-term and cumulative water quality impacts is woefully inadequate.

Sincerely,

Gabriel Solmer
Gabriel Solmer, Supervising Attorney
Environmental Law & Policy Clinic
San Diego Coastkeeper

TEL 619.758.7743
FAX 619.224.4638

ADDRESS 2825 DEWEY ROAD, SUITE # 200
SAN DIEGO, CALIFORNIA 92106

WWW.SDcoastkeeper.org

IMPACT

Th6a

FORM FOR DISCLOSURE
OF EX PARTE
COMMUNICATION

RECEIVED
AUG 09 2010
CALIFORNIA
COASTAL COMMISSION

Date and time of communication:
(For messages sent to a Commissioner by mail or
facsimile or received as a telephone or other
message, date time of receipt should be indicated.)

August 6, 2010, 10:30am

Location of communication:
(For communications sent by mail or facsimile, or
received as a telephone or other message, indicate
the means of transmission.)

Commissioner Neely's Eureka Office

Person(s) initiating communication:

Maggy Herbelin, Local ORCA Representative

Person(s) receiving communication:

Commissioner Bonnie Neely

Name or description of project:

Th6a. CD-033-10 (Navy, Coronado) Consistency
Determination by U. S. Navy for existing and expanded training
activities at the Navy's Silver Strand Training Complex (SSTC)
and the southern nearshore area of Naval Air Station, North
Island (NASNI), Coronado, San Diego Co. (MPD-SF)

Detailed substantive description of content of communication:
(If communication included written material, attach a copy of the complete text of the written material.)

Oppose Staff recommendation of approval. This would be a major expansion
of the training area, almost triple. The expansion is in the nesting area of the
Least Tern. Navy says the dogs used in the training have been trained to
avoid the birds, but have the birds been trained to not be afraid of the dogs??
The Navy has beaches at Camp Pendelton. Requesting a postponement to
the October meeting in Oceanside, or mitigation for impacts.
Speaking for San Diego Audubon, SD Coastwalker and SD Sierra Club.

Date: August 6, 2010


Bonnie Neely, Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte
and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the
communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is
reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the
commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the
Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the
proceedings and provide the Executive Director with a copy of any written material that was part of the communication.

EX-PARTE COMMUNICATIONS DISCLOSURE

RECEIVED
AUG 09 2010
CALIFORNIA
COASTAL COMMISSION

Person(s) initiating communication: Penny Elia - Sierra Club

Person(s) receiving communication: Commissioner Burke

Location of communication: Telephone - 310-351-3333

Time/Date of communication: August 5, 2010 - 4:30 PM

Type of communication: Teleconf

Name or description of the project(s)/topics of discussion:

WMB Burke
8/4/10

W.8.a. Appeal No. A-1-MEN-07-28 (Jackson-Grube Family, Inc., Mendocino Co.)
Speaking for Sierra Club Mendocino Group, supporting the staff recommendation to approve. Express our appreciation of the great work staff did on this item.

W.11.a. Appeal No. A-2-SMC-07-01 (Sterling, San Mateo Co.)
Speaking for Committee for Green Foothills. Staff recommending approval with conditions. Staff recommendation is too permissive on future subdivision. CGF asks that Special Condition 2.A.8 be deleted as it inappropriately would encourage future landowner to seek subdivision of this agricultural land into two lots, which would undermine agricultural viability

W.14.c. San Luis Obispo County LCP Amendment No. SLO-2-09 Part 2 (Inclusionary Housing)

W.14.d. San Luis Obispo County LCP Amendment No. SLO-3-09 (Framework for Planning Update)
Speaking for Coastwalk, CA, support staff recommendations.

W.15.a. Appeal No. A-3-SLO-06-043 (SDS Family Trust, Harmony Coast)
Staff is recommending substantial issue, de novo hearing, denial in part and approval in part. Speaking for Coastwalk, CA SLO, support staff recommendation. Important that the portion of the project eliminating the lateral public access trail easement be denied, as that is needed for the CA Coastal Trail.

W.15.d. Appeal No. A-3-SLO-10-031 (Goodan, Harmony)
Staff is recommending finding substantial issue
Speaking for Coastwalk, CA SLO, support staff recommendation to find substantial issue. Please focus on the project's inconsistencies with the County's certified LCP and LUP and Coastal Act sections regarding protection of coastal agriculture, ESHA, hazards, and public services.

Th.6.a. CD-033-10 (Navy, Coronado) Consistency Determination for SSTC
Speaking For San Diego Audubon, SD Coastkeeper, and SD Sierra Club, oppose staff recommendation to approve. Requesting postponement (to October hearing in San Diego/Oceanside), or mitigation for impacts. We feel that the Navy's proposed project is not consistent with section 30231 of the Coastal Act, and the Commission should impose further restrictions on the Navy, which would make the proposed project consistent with the Coastal Act.

Th.18.a. Appeal No. A-4-MAL-10-053 (WFS Seastar, Malibu)

Speaking for Malibu Coalition for Slow Growth. Oppose staff recommendation of No Substantial Issue. Urge finding substantial issue.

1. Staff agrees factually and legally this project is not consistent with the LCP.

2. By not adhering to the LCP the project will be precedential in Malibu's future interpretation of this LCP section. The cumulative impact of this precedent in a visitor serving community will eventually be great.

Th.19a. Application No. 4-07-098 (California Dept. of Parks and Recreation, Malibu)

Speaking for Sierra Club, support staff and 16 conditions.

F.14.5.a. Appeal No. A-5-LGB-10-166 (Skendarian, Laguna Beach)

Speaking for Angeles Chapter, Sierra Club, support staff recommendation to find substantial issue. The applicant and his consultant do not believe the Coastal Act is the standard of review for this project. They are stating that the standard of review is the City's inadequate and outdated LCP that does not properly address lower-cost visitor serving accommodations.

However, since this project is located between the first public road and the sea, the Coastal Act is the standard of review. Other issues include viewshed, height and bluff delineation.

F.9a. Appeal No. A-5-PPL-10-156 (Morelli, Pacific Palisades)

Speaking for Sierra Club, support staff on recommendation to find substantial issue. Should SI be found, bring back in de novo hearing and combine with "dual" CDP (dual permit jurisdiction).