

CALIFORNIA COASTAL COMMISSION

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original staff report

W13b

January 27, 2017

To: Coastal Commission and Interested Parties

From: Alison Dettmer, Deputy Director
Mark Delaplaine, Manager, Energy, Ocean Resources and Federal Consistency
Division

Subject: **Addendum to CD-0007-16 – Bureau of Land Management, Trinidad
Head Lighthouse Management Plan**

This addendum provides modifications to the above-referenced staff report, based on new recent information and comments on the staff report. These changes do not change staff's recommendation that the Commission **concur** with Consistency Determination No. CD-0007-16.

Revisions to the Staff Report

Additions are shown below in underline and deletions in ~~striketrough~~.

Page 1, last paragraph [continuing onto page 2]:

The Yurok people, which include the Trinidad Rancheria, the Yurok Tribe, and the Tsurai Ancestral Society, have historically considered The Trinidad Head (Chue-rey-wa or Tsurewa) to figure prominently among the sacred places they use to pray and make ceremony. Trinidad Head also: (1) contains a designated state historical landmark, having a site listed within the National Register of Historic Places (USCG Light Station); (2) is surrounded by one of the Critical Coastal Areas (CCAs) - Kelp Beds at Trinidad Head - identified by the multi-agency statewide "CCA" Taskforce as warranting special protection from non-point source runoff; (3) is adjacent to an Area of Special Biological Significance (ASBS) designated by the State Water Resources Control Board (also warranting special protection); (4) is a highly scenic coastal landform providing spectacular public views; and (5) contains a variety of environmentally sensitive plant and animal habitats. In addition, on January 12, 2017, then President Obama issued a proclamation expanding the boundaries of the California Coastal National Monument to include, among six areas statewide, the subject BLM Trinidad Head property.¹

¹ <https://obamawhitehouse.archives.gov/the-press-office/2017/01/12/presidential-proclamation-boundary-enlargement-california-coastal>. (Exhibit 10)

Page 7/8 [indented quotes]:

One of the main concerns for the Yurok Tribe is off-trail use. The Trinidad Head is an area where the Yurok people go to pray. Offerings may have been left behind over the years. If the public wanders off-trail, these offerings may be found and taken.

Under Alternative 1, a toilet will be installed. The Tribe prefers that a toilet not be built because its presence would be offensive on sacred ground. If necessary, portable toilets would be a better option for those times when tours and special events take place.

...

In general, The Tribe would like to see visitation kept to a minimum. The conservation can continue in the future as per Adaptive Management. ~~... Sarah [Lindgren-Akana] mentioned that her grandfather, from the Yurok Tsurai Village, built the road and trail in the area, so they don't want to keep the public out necessarily, but urge the BLM to be conservative in its approach.~~ There is preservation through education, but public use needs to be done in a thoughtful manner. Cumulative impacts are a concern.

Page 8 [to follow immediately after the above quote]:

In addition, in response to the original, January 19 version of this staff report, the Tsurai Ancestral Society asked to clarify its concerns by stating as follows:

Sarah Lindgren-Akana, Yurok Tribal member and Tsurai Ancestral Society member, reiterated concerns raised in their April 22nd, 2015 letter to Molly Brown BLM, regarding the first draft of proposed management plan for the Trinidad Head Lighthouse property public comment.

In that letter, the following points were raised:

- The BLM's management plan for the Lighthouse Property needs to be consistent with the existing 'light recreational use' designation for the City of Trinidad owned portion of Trinidad Head. All visitors to the Lighthouse Property must pass through the City owned portion, therefore, must abide by their usage guidelines.
- No guided tours on a frequent basis, and no shuttle service provided to the Light House Property.
- No additional trail systems.
- The Tsurai Ancestral Society strongly requests the BLM to work directly with the Yurok Tribe and Tsurai Ancestral Society on any proposed signage in the area. BLM is fully aware of the past conflicts with this issue and hope to see better efforts in the future.
- Bathrooms are located at the base of Trinidad Head. These restrooms are located within walking distance of the Lighthouse Property and will prevent the need for large service trucks such as those needed to clean and deliver outhouse style porta-potties.

- Create a vegetation management guideline with the Tsurai Ancestral Society and Yurok Tribe.

The Society also seeks clarification of the information contained in Exhibit 7 (third page, under the heading “Tribal Concerns”). These clarifications are added to this staff report as a new Exhibit (Exhibit 8).

In deference to the ~~Tribalse~~ concerns raised, and based on the evidence of damage from past vandalism, BLM selected the less intensive of the two active access alternatives. In addition, as noted above, BLM has incorporated monitoring and adaptive management measures, which could lead to modifications to either further restrict, or increase, visitor use, depending on the monitoring results. BLM has also committed to notifying the Commission staff in the event any changes to access levels or improvements are contemplated or warranted. This agreement allows the Commission to assure, through continuing review under the “reopener” provision of the federal consistency regulations (15 CFR § 930.45), that activities carried out under the Plan will remain consistent with the enforceable policies of the state’s plan (i.e., with Sections 30210 and 30214 of the Coastal Act). Under this provision, further Commission staff (or Commission, if warranted) reviews of Plan modifications and/or changed circumstances could be triggered.

Page 9 [first paragraph after Section 30244]:

BLM’s Environmental Assessment (EA) describes the extensive cultural values and history at Trinidad Head (Exhibit 7). As noted in the previous section of this report, Trinidad Head is culturally and spiritually significant to the Native American communities in this North Coast region. BLM has also documented that the lighthouse and bell house are historically significant structures, and that they would be maintained in a manner that protects its historic integrity, and in coordination with the State Historic Preservation Officer (SHPO). To fulfill its Tribal Coordination responsibilities, BLM consulted with two federally-recognized Tribes, the Trinidad Rancheria (Cher-Ae Heights Community of the Trinidad Rancheria) and the Yurok Tribe, as well as with the tribal 501(c)3 organization (the Tsurai Ancestral Society). The EA (p. 25 [3rd page of Exhibit 7]) expresses the Trinidad Rancheria’s ~~bal~~ ~~Representatives’~~ preference for “the Medium Access Option” which the current proposal represents. (See page 5 above, and Exhibit 5 (attached), for a more detailed alternatives comparison.) As noted above, the Yurok Tribe would prefer “visitation kept to a minimum.” The Tsurai Ancestral Society's preference is as stated above: "The BLM's management plan for the Lighthouse Property needs to be consistent with the existing ‘light recreational use’ designation for the City of Trinidad owned portion of Trinidad Head ...”. The reasons behind ~~the Tribal concerns over extensive and possibly unmanaged access areis preference are also~~ summarized in the previous section of this report above, in which the Commission concludes that the proposed level of access (with Monitoring and Adaptive Management) represents an appropriate balance under the Coastal Act when considering cultural resources. The Commission further finds that this level of access, combined with the Monitoring and Adaptive Management measures described above, can be considered “reasonable mitigation” for cultural resource impacts, for purposes of complying with Section 30244.

Correspondence Received (attached and added as two new Exhibits to the Staff Report)

- Emails from Tsurai Ancestral Society requesting clarifications of expression of its previously-stated concerns over cultural resource impacts, January 23, and 25, 2017.
- Email from Friends of Trinidad Head, January 24, 2017.

Staff Response to Comments

Emails from Tsurai Ancestral Society

The Tsurai Ancestral Society informed Commission staff it disagreed with the characterizations in the staff report taken from BLM's notes of its Tribal Coordination Meetings. The report is modified as shown above (and with an added Exhibit 8) to clarify the Society's concerns.

Email from Friends of Trinidad Head

The Commission staff was copied on an email from Friends of Trinidad Head to the City of Trinidad, dated January 24, 2017, requesting improved enforcement of the barrier to non-authorized vehicular trail on the north side of Trinidad Head (Exhibit 9). Friends of Trinidad Head requested BLM to work with the City on assuring the barrier remains in place. The Commission staff notes that this barrier is not on BLM's parcel covered by the subject Management Plan, and, as noted on page 5 of this report, that the City has primary responsibility for managing the Trail). Regardless, BLM and the City have agreed to work cooperatively together to implement the recommendations contained in the email.

Attachments (New Exhibits 8, 9 and 10)

Changes to Staff Report Recommended by Tsurai Ancestral Society

C. Public Access and Recreation, page 8:

Sarah Lindgren-Akana, Yurok Tribal member and Tsurai Ancestral Society member, reiterated concerns raised in their April 22nd, 2015 letter to Molly Brown BLM, regarding the first draft of proposed management plan for the Trinidad Head Lighthouse property public comment.

In that letter, the following points were raised:

- The BLM's management plan for the Lighthouse Property needs to be consistent with the existing "light recreational use" designation for the City of Trinidad owned portion of Trinidad Head. All visitors to the Lighthouse Property must pass through the City owned portion, therefore, must abide by their usage guidelines.
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- The Tsurai Ancestral Society strongly requests the BLM to work directly with the Yurok Tribe and Tsurai Ancestral Society on any proposed signage in the area. BLM is fully aware of the past conflicts with this issue and hope to see better efforts in the future.
- Bathrooms are located at the base of Trinidad Head. These restrooms are located within walking distance of the Lighthouse Property and will prevent the need for large service trucks such as those needed to clean and deliver outhouse style porta-potties.
- Create a vegetation management guideline with the Tsurai Ancestral Society and Yurok Tribe.

Tribal Concerns, page 25:

The Tsurai Ancestral Society represents the documented direct lineal descendants of the Yurok village of Tsurai. The Trinidad Head and surrounding area is within the tradition boundaries of the Tsurai Village and has been maintained throughout time, by the ancestors of the Tsurai Ancestral Society's members.

According to the current draft of the management plan for the Lighthouse Property staff report dated 01/19/2017, the plan stated BLM will open the locked gate to the Lighthouse property once per month to allow for public access. The plan does not define what "general public access" means in this context. The Tsurai Ancestral

**Exhibit 8
Tsurai Ancestral
Society
Comments**

Society recommends the definition be as follows: non-advertised, hiking by foot and expressly excluding vehicle travel or shuttle services.

Further, the staff report states in addition to having the gates opened once a month to general public, BLM will be open to scheduled field trips by schools and other groups. Again, the Tsurai Ancestral Society recommends BLM be consistent with the existing usage guidelines for the surrounding City owned portion of the Head. The Tsurai recommend field trips for schools be scheduled no more than twice a month.

"Other groups" needs to be defined, as it is not clear what the BLM means. "Groups" should be limited to no more than 50 people and no more than once a month.

The Tsurai Ancestral Society does not think hosting events, on top of field trips twice a month, with an unknown amount of students and teachers; monthly open general public hiking, also with an unknown amount of foot traffic; and groups of up to 50 people once a month, would be considered light recreations use. Events, in and of themselves, are generally meant to host and attract as many people as possible. By reasonable person's standard, that does not fall in line with the usage guidelines of the property surrounding the Lighthouse, of which all visitors must pass through to gain access to BLM property.

For the definition of 'light recreational use' please see our public comment letter dated April 22nd, 2015.

From: [Merrill, Bob@Coastal](mailto:Merrill.Bob@Coastal)
To: [Delaplane, Mark@Coastal](mailto:Delaplane.Mark@Coastal)
Subject: FW: BLM/Trinidad Head Lighthouse Management Plan
Date: Thursday, January 26, 2017 6:25:20 AM

From: Kimberly Tays [kimkat067@gmail.com]
Sent: Tuesday, January 24, 2017 3:49 PM
To: Fuller, David D
Cc: Berman, Dan@City of Trinidad; Simon, Larry@Coastal; Merrill, Bob@Coastal; Sarah Lindgren-Akana; kelly lindgren
Subject: BLM/Trinidad Head Lighthouse Management Plan

Dear Mr. Fuller,

I submitted comments to you on October 18, 2015 re: BLM's Proposed Trinidad Head Lighthouse Management Plan. I reviewed the Coastal Commission's staff report for their February meeting and am, for the most part, pleased with the details of the Plan.

However, I did not see any mention of securing the bottom of the Head from unauthorized vehicles. Right now, there is only a chain gate to stop people from driving up the road. The chain, itself, has a sign that says "Authorized Vehicles Only," but if the chain is not put back up, it appears as if the road is open to the public. Now that the Lighthouse area is designated a California Coastal National Monument, I am concerned more people will try to drive up the road to see the Lighthouse, especially if it appears to be a public road.

Since this important landmark will now be managed by the City of Trinidad and BLM, I am hoping BLM staff will work with Trinidad in coming up with ways to prevent unauthorized vehicles from driving on the Head. A few simple steps would be to: (1) install a couple of small (but visible) signs on the actual gate posts that say "**AUTHORIZED VEHICLES ONLY**"; that way, if the chain is not reinstalled, there are still warning signs in place), (2) ask the various personnel working on the Head to please reinstall the chain when they are done, and (3) contact Google and ask them to fix their map of Trinidad Head. Right now, if people were to look up Trinidad Head or the Lighthouse on their phones, the Google Map shows a public road going up Trinidad Head. Since Trinidad Head's designation as a CCONM will likely increase public visits, it is important the agencies managing the Head do what they can to prevent more unauthorized vehicles from driving up Trinidad Head and endangering hikers, as authorized vehicle use on the Head has been an ongoing problem.

Please let me know if you would be willing to discuss this issue with the City staff or if you need any additional information.

Thank you,
Kimberly Tays
Friends of Trinidad Head

Exhibit 9
Friends of Trinidad
Head Comments

The White House

Office of the Press Secretary

For Immediate Release

January 12, 2017

Presidential Proclamation -- Boundary Enlargement of the California Coastal National Monument

BOUNDARY ENLARGEMENT OF THE CALIFORNIA COASTAL NATIONAL MONUMENT

- - - - -

BY THE PRESIDENT OF THE UNITED STATES OF AMERICA

A PROCLAMATION

Through Proclamation 7264 of January 11, 2000, President Clinton established the California Coastal National Monument (monument) to protect the biological treasures situated on thousands of unappropriated or unreserved islands, rocks, exposed reefs, and pinnacles owned or controlled by the Government of the United States within 12 nautical miles of the shoreline of the State of California. Presidential Proclamation 9089, issued on March 11, 2014, expanded the monument to include the Point Arena-Stornetta Public Lands, a landscape of coastal bluffs and shelves, tide pools, onshore dunes, coastal prairies, and riverbanks, and the mouth and estuary of the Garcia River. In addition to providing vital habitat for wildlife, these coastal lands were critical for the native peoples who first lived along the California Coast, and they continue to be treasured by modern generations.

Six other spectacular areas along the California Coast contain significant scientific or historic resources that are closely tied to the values of the monument. Like the protections afforded by prior proclamations, protection of Trinidad Head, Waluph-Lighthouse Ranch, Lost Coast Headlands, Cotoni-Coast Dairies, Piedras Blancas, and

**Exhibit 10
CA Coastal
National
Monument
Proclamation**

Orange County Rocks and Islands would protect and preserve objects of historic or scientific interest on the California Coast.

Trinidad Head

About 30 miles north of Eureka lies the majestic and culturally important promontory known as Trinidad Head. The tip of Trinidad Head encompasses several prominent historic sites along with the rocky ledges that provide their setting, such as the Trinidad Head Light Station, which first operated in 1871 and is still active today. Accompanied by a small wooden bell house, it sits atop sheer cliffs overlooking crashing waves and rugged sea stacks. The importance of this location predated its first use as a lighthouse. Nearly 100 years earlier, on June 9, 1775, representatives of the local Yurok community first made contact with two Spanish ships there. A granite cross installed in 1913 sits in a clearing above the lighthouse, commemorating the spot where the Spanish erected a wooden cross two days later to claim the area for King Charles III. Today, the area is culturally and spiritually significant to the Cher-Ae Heights Indian Community of the Trinidad Rancheria, the Yurok Tribe, and the Tsurai Ancestral Society.

Coastal bluff scrub vegetation, including coyote brush, California wax myrtle, salal, blue blossom, ocean spray, and evergreen huckleberry, surrounds these historic features. Scattered stands of Sitka spruce, Douglas fir, and red alder stand out among these native shrubs and herbs. Coast Indian paintbrush grows in rocky outcroppings near the bell house, adding splashes of crimson to the landscape. Visitors to Trinidad Head enjoy observing the Trinidad seabird colony, which makes its home on the rocks and islands off the coast of Trinidad Head and contains over 75,000 birds, including several species of cormorant, the common murre, and occasionally tufted puffins.

Waluplh-Lighthouse Ranch

Perched on the edge of Table Bluff, 12 miles south of Eureka, Waluplh-Lighthouse Ranch has spectacular panoramic views of the Pacific Ocean, Eel River Delta, and the south spit of Humboldt Bay. In addition to outstanding scenery, visitors to Waluplh-Lighthouse Ranch can view migratory raptors, songbirds, and the endangered marbled murrelet.

Waluplh-Lighthouse Ranch is part of the ancestral home and current cultural traditions of the Wiyot Tribe, who gave it the name Waluplh. With its expansive views, the area served as a lookout point for the Tribe, as well as a crossroads for trails connecting

inland areas with Humboldt Bay to the north and the bottomlands surrounding the mouth of the Eel River to the south. Beginning in the late 1800s, Waluplh-Lighthouse Ranch was developed as a Coast Guard facility, and during World War II, it served as a coastal lookout post and the base for a mounted beach patrol. There are no longer any buildings on the property, so visitors now enjoy its panoramic views surrounded by open space.

Lost Coast Headlands

Thirteen miles south of Waluplh-Lighthouse Ranch, the Lost Coast Headlands present a majestic coastline, encompassing rolling hills and dramatically eroding bluffs, punctuated by freshwater creeks, ponds, and pockets of forests. Underlying the Lost Coast Headlands are layers of highly erodible sedimentary rock known as the Wildcat Group. This geology has weathered over the years, leading to deeply carved and incised bluffs along the beach made up of multi-hued layers of gray clay, golden sandstone, and brown siltstone. The eroding of the bluffs over time exposes fossils of scallops, clams, and snails, providing a glimpse of the marine fauna that lived in the area during the Pleistocene Epoch 2.6 million to 11,700 years ago.

Coastal scrub vegetation and open grasslands blanket the area's rolling hills. Coyote brush and California blackberry dominate, and in the grasslands, small patches of native Pacific reed grass meadow remain. Pockets of Douglas fir, Sitka spruce, and grand fir shadow the eroded draws. These diverse habitats support an array of wildlife species, including black-tailed deer, bobcat, brush rabbit, and Douglas squirrel. While more elusive, gray fox, coyote, and mountain lion also pass through the area, and a careful observer may notice signs of their presence. A variety of small birds dart about its grasslands and scrub, while raptors such as American kestrels, northern harriers, peregrine falcons, and Cooper's hawks scan for prey overhead. Quiet visitors may hear hairy woodpeckers in the forested draws. Foraging shorebirds and gulls, along with the occasional harbor seal, can be observed on the narrow beaches.

Buffered by red alder and willow, Guthrie and Fleener creeks wind their way through the Lost Coast Headlands on their way to the sea. Both perennial streams provide habitat for three-spined stickleback, a small native fish. Sculpin, Pacific lamprey, and the threatened Northern California steelhead have also been observed in Guthrie Creek, and both creeks are potential habitat for the threatened coho salmon. During the summer, the mouth of Guthrie Creek widens into a lagoon that can provide shelter for estuary-dependent fish and invertebrates. The area also features three small,

freshwater ponds that provide habitat for the threatened California red-legged frog and a variety of waterfowl, including green-winged teals.

While few signs of it remain, the northernmost point of the Lost Coast Headlands was once the site of the Centerville Beach Naval Facility, established in 1958 to monitor Soviet submarines during the Cold War. For more than 100 years, several families who settled nearby grazed livestock in the area.

Cotoni-Coast Dairies

Near Davenport in Santa Cruz County, Cotoni-Coast Dairies extends from the steep slopes of the Santa Cruz Mountains to the marine coastal terraces overlooking the Pacific Ocean. Sitting atop the soft Santa Cruz Mudstone Formation and the hard, silica-rich Monterey Formation, the area's bedrock supports a diversity of soils and vegetation that have sustained wildlife and people alike for millennia.

Dating back at least 10,000 years, an ancestral group known to archaeologists as the Costanoan or Coastal People (also called the Ohlone) lived in this region, and the Cotoni, a tribelet of this group, lived in the Cotoni-Coast Dairies area. Lithic scatter sites and shell middens demonstrate that inhabitants moved between the coastal ecological zones and upland environments, making use of the landscape's diverse resources. Europeans first made contact with the Cotoni in the 1600s and 1700s. Most of the Costanoan people were converted to Christianity, many forcibly, during California's Mission period in the late 1700s and 1800s, and by the early 1900s, much of the ancient cultural heritage of the Coastal People was left only to memory.

Six perennial streams form the heart of Cotoni-Coast Dairies' ecosystem, flowing from the coastal mountains down to the Pacific Ocean. Molino Creek, Ferrari Creek, San Vicente Creek, Liddell Creek, Yellow Bank Creek, and Laguna Creek have each carved steep canyons on their path to the sea. Vibrant riparian areas follow along the six stream corridors, with red alder and arroyo willow forests dominating the vegetative community. A seventh stream, Scott Creek, flows along a small portion of the area's northern boundary. Most of the area's wetlands can be found within these riparian corridors, though others exist in meadows and floodplains.

Beyond supporting riparian and wetland communities, Cotoni-Coast Dairies' waterways provide important habitat for anadromous and freshwater fish. All of the streams are thought to have historically supported salmon populations. Today, the

threatened steelhead and coho salmon can be found on spawning runs in San Vicente Creek, while steelhead are also found in Liddell Creek and Laguna Creek. The endangered tidewater goby may also be found in the tidally influenced portion of Laguna Creek. The threatened California red-legged frog uses many of the waterways and water sources here, along with a wide range of other amphibians and reptiles.

Grasslands, scrublands, woodlands, and forests surround the riparian corridors in Cotoni-Coast Dairies. Purple needlegrass and other native species, such as California oatgrass and blue wildrye, characterize the coastal prairie grassland community. The intermixed wildflowers in the community provide visitors a colorful display in the spring and early summer. Occasional freshwater seeps amid the grasslands support sedges, California buttercup, brown-headed rush, and other species.

California sagebrush and coyote brush scrub communities blanket the area's bluffs and hillside slopes. Native trees, including Douglas fir and coast live oak, dominate forests, which also include stands of coastal trees such as madrone, California bay, Monterey pine, and knobcone pine. Visitors are drawn to stands of coast redwood, which thrive on the north-facing slopes in some watersheds, accompanied by redwood sorrel, elk clover, and other understory species.

The diversity of the uplands vegetation in Cotoni-Coast Dairies supports a rich wildlife community including a vast and varied mammalian population. Among the many species inhabiting Cotoni-Coast Dairies are California voles, dusky-footed woodrats, black-tailed jackrabbits, mule deer, and gray fox. Evidence also suggests that both bobcats and mountain lions hunt here.

Visitors to Cotoni-Coast Dairies may be able to catch a glimpse of a variety of avian species, including black swifts, orange crowned warblers, American kestrels, Cooper's hawks, white-tailed kites, and peregrine falcons. In the riparian areas, one may encounter Wilson's warblers, downy woodpeckers, and tree swallows, among others. Various bat species, including the Townsend's big-eared bat, can be seen darting overhead at dusk.

Piedras Blancas

Only 40 miles north of San Luis Obispo, the large white coastal rocks for which Piedras Blancas was named have served as a landmark for centuries to explorers and traders along the central coast of California. Sitting at a cultural interface between

Northern Chumash and Playanos Salinan peoples, Piedras Blancas was and still remains important to Native Americans. The human history of the area stretches back at least 3,000 years, and archaeologists have found stone tools, debris from tool knapping, discrete quarrying locations, and shell midden deposits that help tell that history. Native peoples largely used the area as a source of raw stone and for the manufacture of stone tools.

In 1542, the Spanish explorer Juan Rodriguez Cabrillo noted the value of this area as a maritime guidepost, and the land he sighted from his ship was later claimed by the Spanish, followed by the Governor of Mexico, and subsequently became part of the United States. A lighthouse built in the 1870s still stands today, albeit without the three upper levels that were removed after being damaged by an earthquake in 1948. The lighthouse, with its ornate brick and cast-iron structure, is listed in the National Register of Historic Places along with its surrounding buildings, such as the 1906 fog-signal and oil house. Visitors to Piedras Blancas today are treated to unmatched scenic vistas of the rugged mountain peaks of the Santa Lucia Range and the deep blue waters of the Pacific Ocean. Dramatic geologic features, such as the namesake white rocks, along with the area's characteristic fog, contribute to a dynamic visual landscape.

The bedrock in the area consists of both sedimentary and volcanic rocks of the Franciscan Formation. This Formation represents Jurassic age material from the Pacific Plate that scraped off and attached to the continental margin of North America. Atop the bedrock lie Monterey Formation rocks, topped with marine terrace deposits. Rain percolates through the rock surface and sub-surface and emerges dramatically as ephemeral springs from cliff faces.

California sea lions, harbor seals, and northern elephant seals all spend time on the shores and within the waters of this area. Visitors may observe colonies of massive elephant seals loafing in the sun at Piedras Blancas, where females can be seen nursing their pups, and males occasionally battle for dominance. For decades, scientists have used this land to conduct annual censuses of the threatened southern sea otter and other marine mammals. From the mainland of Piedras Blancas, visitors can also be treated to regular visits by migrating gray and humpback whales, and occasionally blue, minke, and killer whales as well, in addition to bottlenose dolphins.

Marine birds perched on or soaring over the Piedras Blancas rocks include Brandt's cormorants, black oystercatchers, peregrine falcons, and brown pelicans. In a remarkable spring display, Pacific loons can be seen migrating offshore of Piedras Blancas by the tens of thousands. In the rocky intertidal zone found along these shores, scientists have documented mussels, ochre starfish, barnacles, sea anemones, and black and red abalones.

The lighthouse's windswept onshore point is also a sanctuary for plants and wildlife. Over 70 types of native plants, including members from the agave, cashew, sunflower, carnation, morning glory, gourd, iris, and poppy families, establish a foothold in the fine sand and fine sandy loam soils. Together this diversity of vegetation can be characterized as northern coastal bluff scrub. If visitors time their visit, they will be treated to a dazzling array of blooms from species such as seaside poppy, seaside daisy, coastal bush lupine, hedge nettle, dune buckwheat, and compact cobwebby thistle. This native vegetation supports many wildlife species, including brush rabbits, California voles, dusky-footed woodrats, and bobcats. Black-bellied slender salamanders, threatened red-legged frogs, western terrestrial garter snakes, and other reptiles and amphibians thrive in the Piedras Blancas area.

Orange County Rocks and Islands

This area consists of a series of offshore rocks, pinnacles, exposed reefs, and small islands off the Orange County coastline, where visitors onshore are treated to dramatic crashing waves, unique geology, and an abundance of marine-dependent wildlife. These rocks and islands lie within the current monument boundary but were not previously reserved as part of the monument. These offshore rocks, many in pocket coves, contribute to the rugged beauty of the Orange County coastline and themselves include objects of scientific and historic interest. The features also provide important connectivity from south to north for shore birds and sea birds, as well as for California sea lions and harbor seals.

Cormorants, brown pelicans, gulls, and a variety of other shore birds and sea birds can be seen roosting, resting, and feeding on the jagged rocks and small islands. These rocks and islands are also haul-out areas for marine mammals, including California sea lions, harbor seals, and the occasional northern elephant seal.

Rich in vital nutrients, this offshore zone of swirling currents supports a variety of habitats and organisms. The tide pools around these rocks and islands are home to a

diversity of hardy intertidal seaweeds and animal species uniquely adapted for survival within the alternating and equally harsh environs of pounding surf and baking sun.

The protection of Trinidad Head, Waluplh-Lighthouse Ranch, Lost Coast Headlands, Cotoni-Coast Dairies, Piedras Blancas, and Orange County Rocks and Islands as part of the California Coastal National Monument will preserve their cultural, prehistoric, and historic legacy and maintain their diverse array of natural and scientific resources, ensuring that the historic and scientific value of these areas, and their numerous objects of historic or scientific interest, remain for the benefit of all Americans.

WHEREAS, section 320301 of title 54, United States Code (known as the "Antiquities Act"), authorizes the President, in his discretion, to declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated upon the lands owned or controlled by the Federal Government to be national monuments, and to reserve as a part thereof parcels of land, the limits of which in all cases shall be confined to the smallest area compatible with the proper care and management of the objects to be protected;

WHEREAS, it is in the public interest to preserve the objects of scientific and historic interest on the public lands of Trinidad Head, Waluplh-Lighthouse Ranch, Lost Coast Headlands, Cotoni-Coast Dairies, Piedras Blancas, and Orange County Rocks and Islands;

NOW, THEREFORE, I, BARACK OBAMA, President of the United States of America, by the authority vested in me by section 320301 of title 54, United States Code, hereby proclaim the objects identified above that are situated upon lands and interests in lands owned or controlled by the Federal Government to be part of the California Coastal National Monument and, for the purpose of protecting those objects, reserve as part thereof all lands and interests in lands owned or controlled by the Federal Government within the boundaries described on the accompanying maps, which are attached hereto and form a part of this proclamation. The Orange County Rocks and Islands shall be managed as part of the original offshore area of the monument, and the remainder of the lands shall be known as the Trinidad Head, Waluplh-Lighthouse Ranch, Lost Coast Headlands, Cotoni-Coast Dairies, and Piedras Blancas units of the monument, respectively. These reserved Federal lands and interests in lands encompass approximately 6,230 acres. The boundaries described on the

accompanying maps are confined to the smallest area compatible with the proper care and management of the objects to be protected.

All Federal lands and interests in lands within the boundaries described on the accompanying maps are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, or other disposition under the public land laws, from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument.

The enlargement of the boundary is subject to valid existing rights. If the Federal Government subsequently acquires any lands or interests in lands not owned or controlled by the Federal Government within the boundaries described on the accompanying maps, such lands and interests in lands shall be reserved as a part of the monument, and objects identified above that are situated upon those lands and interests in lands shall be part of the monument, upon acquisition of ownership or control by the Federal Government.

The Secretary of the Interior (Secretary) shall manage the area being added to the monument through the Bureau of Land Management (BLM) as a unit of the National Landscape Conservation System, pursuant to applicable legal authorities, to protect the objects identified above.

The Cotoni-Coast Dairies unit of the monument shall become available for public access upon completion of a management plan by the BLM, consistent with the care and management of the objects identified above.

Consistent with the care and management of the objects identified above, and except for emergency or authorized administrative purposes, motorized vehicle use in areas being added to the monument shall be permitted only on designated roads, and non-motorized mechanized vehicle use shall be permitted only on designated roads and trails.

Nothing in this proclamation shall be construed to interfere with the operation or maintenance, or the replacement or modification within the existing authorization boundary, of existing weather station, navigation, transportation, utility, pipeline, or telecommunications facilities located on the lands added to the monument in a manner consistent with the care and management of the objects to be protected.

Other rights-of-way shall be authorized only if they are necessary for the care and management of the objects to be protected.

Nothing in this proclamation shall be deemed to enlarge or diminish the rights or jurisdiction of any Indian tribe. The Secretary shall, to the maximum extent permitted by law and in consultation with Indian tribes, ensure the protection of Indian sacred sites and traditional cultural properties in the monument and provide access by members of Indian tribes for traditional cultural and customary uses, consistent with the American Indian Religious Freedom Act (42 U.S.C. 1996) and Executive Order 13007 of May 24, 1996 (Indian Sacred Sites).

Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands added to the monument, consistent with the care and management of the objects identified above.

Nothing in this proclamation shall be deemed to enlarge or diminish the jurisdiction of the State of California or the United States over submerged or other lands within the territorial waters off the coast of California, nor shall it otherwise enlarge or diminish the jurisdiction or authority of the State of California, including its jurisdiction and authority with respect to fish and wildlife management.

Nothing in this proclamation shall affect the rights or obligations of any State or Federal oil or gas lessee within the territorial waters off the California Coast.

Nothing in this proclamation shall be construed to alter the authority or responsibility of any party with respect to emergency response activities within the monument, including wildland fire response.

Nothing in this proclamation shall be deemed to revoke any existing withdrawal, reservation, or appropriation; however, the monument shall be the dominant reservation.

Warning is hereby given to all unauthorized persons not to appropriate, injure, destroy, or remove any feature of the monument and not to locate or settle upon any of the lands thereof.

IN WITNESS WHEREOF, I have hereunto set my hand this twelfth day of January, in the year of our Lord two thousand seventeen, and of the Independence of the United States of America the two hundred and forty-first.

BARACK OBAMA

CALIFORNIA COASTAL COMMISSION

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W13b

Filed:	11/30/16
60 th Day:	1/29/17
75 th Day:	2/13/17
Staff:	M. Delaplaine-SF
Staff Report:	1/19/17
Hearing Date:	2/8/17

STAFF REPORT: REGULAR CALENDAR

Consistency Determination No.:	CD-0007-16
Federal Agency:	Bureau of Land Management
Location:	Trinidad Head, Trinidad, Humboldt County
Project Description:	Management Plan for Trinidad Head Lighthouse
Staff Recommendation:	Concurrence

SUMMARY OF STAFF RECOMMENDATION

The Bureau of Land Management (BLM) has submitted a consistency determination for its proposed Trinidad Head Lighthouse Management Plan. The lighthouse and surrounding 13 acres of land covered under the plan was transferred from the Coast Guard to BLM in 2014. While the lighthouse has been available since that transfer for guided tours and field trips, a locked gate currently prevents general public access from the Trinidad Head Trail, along the driveway, to the lighthouse. The purpose of the Plan is to allow monthly public access along that driveway, and provide additional public access amenities, in a manner protective of the significant coastal resources at Trinidad Head.

The Yurok people, which include the Trinidad Rancheria, the Yurok Tribe, and the Tsurai Ancestral Society, have historically considered The Trinidad Head (Chue-rey-wa or Tsurewa) to figure prominently among the sacred places they use to pray and make ceremony. Trinidad Head also: (1) contains a designated state historical landmark, having a site listed within the National

Register of Historic Places (USCG Light Station); (2) is surrounded by one of the Critical Coastal Areas (CCAs) - Kelp Beds at Trinidad Head - identified by the multi-agency statewide “CCA” Taskforce as warranting special protection from non-point source runoff; (3) is adjacent to an Area of Special Biological Significance (ASBS) designated by the State Water Resources Control Board (also warranting special protection); (4) is a highly scenic coastal landform providing spectacular public views; and (5) contains a variety of environmentally sensitive plant and animal habitats.

Under the Plan, BLM would allow general public access to the site once per month (the first Saturday of each month), in addition to allowing more frequent school (and other group) field trips. BLM would monitor the site on “open” days, and if monitoring results warrant, alter the access in a manner more protective of natural and cultural resources. The Plan includes measures for removing invasive species, installation of benches and an information kiosk, improvements to walkways for public safety, and monitoring for vandalism. The lighthouse would be maintained in coordination with the State Historic Preservation Officer (SHPO). Cultural monitors would be present for any ground disturbance activities. Where project features have not been fully designed (such as the information kiosk), BLM would coordinate with the Commission staff to assure they would complement and be compatible with the scenic resources of the site.

The Plan would increase public access in a manner consistent with the resource protection needs of the site, and would protect cultural, historic, scenic, and biological resources on the property. The staff recommends the Commission find the proposed Plan consistent with the public access and recreation, cultural, and visual resource policies of the Coastal Act (Sections 30210, 30214, 30244, and 30251). The Plan would not affect any wetlands or environmentally sensitive habitat.

Therefore, the Commission staff recommends **concurrence** with CD-0007-16. The **motion** to implement this recommendation is found on **Page 4**. The standard of review for this project is Chapter 3 of the Coastal Act.

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APPENDICES

Appendix A – Substantive File Documents

EXHIBITS

- Exhibit 1 – Regional Location Map
- Exhibit 2 – Aerial Photo, Trinidad Head (2013)
- Exhibit 3 – Existing Conditions
- Exhibit 4 – Proposed Plan
- Exhibit 5 – Alternatives Comparison Chart
- Exhibit 6 – Alternative 1
- Exhibit 7 – Cultural and Historic Resources Discussion

I. FEDERAL AGENCY’S CONSISTENCY DETERMINATION

The Bureau of Land Management has determined the project consistent to the maximum extent practicable with the California Coastal Management Program (CCMP).

II. MOTION AND RESOLUTION

Motion:

*I move that the Commission **concur** with consistency determination CD-0007-16.*

Staff recommends a **YES** vote on the motion. Passage of this motion will result in a concurrence in 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:

*The Commission hereby **concurs** with consistency determination CD-0007-16 by the Bureau of Land Management on the grounds that the project is fully consistent, and thus consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program.*

III. FINDINGS AND DECLARATIONS

A. PLAN DESCRIPTION AND BACKGROUND

The Trinidad Head Lighthouse, located on the south side of Trinidad Head, was installed in 1871. It was part of a 13-acre site operated and maintained by the U.S. Coast Guard; the site also contained a Bell House (housing a fog bell) and housing for Coast Guard housing personnel (Exhibits 2-4). After automating the lighthouse and no longer needing the housing, the Coast Guard relinquished the site to the BLM in May 2014.¹ (The Coast Guard continues to operate the automated light signal attached to the lighthouse, as well as the fog bell.) The Coast Guard also removed the housing structures, although associated infrastructure remains (e.g., water tanks, electric lines).

The 13-acre site is fenced and gated. After the lighthouse was automated, the Coast Guard began opening the site to the public for lighthouse tours once per year for the annual Trinidad Fish Festival. After taking ownership of the site in 2014, BLM continued to open the lighthouse during planned events six times per year, as well as during field trips scheduled for schools and other groups, and began the planning process for the proposed Management Plan.

BLM states that the purposes of the proposed Management Plan are to: (1) maintain the historic integrity of the lighthouse; (2) maintain and improve facilities and structures on the 13 acre site; (3) provide opportunities for safe public access; (4) provide opportunities for

¹ The Commission reviewed this transfer in Negative Determination ND-008-14.

protection and interpretation of natural and cultural values of the site and surrounding area; and (5) provide opportunities for collaboration with and participation by the community of Trinidad.

In a somewhat related matter, in April 1983 the Commission concurred with a BLM consistency determination for transfer of the remainder of Trinidad Head (47 acres north of the subject 13-acre site) to the City of Trinidad to be used for recreation, open space, and related resource protection purposes (CD-6-83). Since that transfer, the City of Trinidad has assumed management of the Trinidad Head Trail, which leads from the parking lot at the base of Trinidad Head and circumnavigates the higher elevations at the Head.

Access from the Trinidad Head Trail to the lighthouse is currently restricted to the general public by a locked gate located on the driveway used to access the lighthouse area. Under the Plan, BLM would open the gate to allow general public access to the lighthouse site once per month, on the first Saturday of each month, in addition to scheduled school (and other group) field trips. BLM would monitor the site on “open” days, and if monitoring results warrant, alter the access in a manner more protective of natural and cultural resources. The Plan also includes removal of invasive species, installation of up to 3 benches at the former Coast Guard Housing site, installation of an information kiosk at the gateway, and improvements to walkways.

In developing the Plan, BLM considered three alternatives (Exhibits 3-6):

(1) the proposed Plan (Exhibit 4);

(2) “Alternative 1,” which would involve a more intensive level of access and a larger area of accessibility (i.e., the entire site open to the general public for day use, except for the lighthouse and Bell House buildings), and with additional public amenities such as fencing viewing platform, a spotting scope, picnic tables, a toilet, and trash containers, interpretive signs, reopening a connector trail, and a larger number of scheduled lighthouse tours (Exhibit 6); and

(3) No Action (i.e., no general public access) (Exhibit 3).

Exhibit 5 lists, side-by-side, the components that would be associated with each of the alternatives.

B. OTHER AGENCY/TRIBAL REVIEWS

During preparation of the Plan, BLM consulted with the U.S. Coast Guard, City of Trinidad, Trinidad Rancheria, Yurok Tribe, Tsurai Ancestral Society, and the Commission staff.

C. PUBLIC ACCESS AND RECREATION

Coastal Act Section 30210 states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Coastal Act Section 30214 states:

(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

(1) Topographic and geologic site characteristics.

(2) The capacity of the site to sustain use and at what level of intensity.

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

...

(c) In carrying out the public access policies of this article, the commission and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.

As noted in the project description, the proposed Plan is intended to improve and increase opportunities for coastal access at Trinidad Head, which is a locally and regionally important visitor destination point offering scenic views and unique coastal recreation experiences. While most of Trinidad Head is inaccessible due to extremely steep slopes and thick vegetation, the Head can be accessed and circumnavigated at higher elevations via the popular and heavily used, approximately one mile long, Trinidad Head Trail. Interspersed along the trail are several relatively short spur trails that terminate at selected scenic vista points offering unique views.

This trail is open to the general public from dawn to dusk throughout the year. It begins at the parking lot at the base and north of Trinidad Head, which also serves Trinidad Pier, Harbor and Boat Ramp. While this trail connects to the driveway to the lighthouse, it is currently inaccessible to the general public, due to the locked gate currently blocking the driveway.

Under the plan, the gate would be open to the general public on the first Saturday each month during daylight hours. In addition, six planned events would occur each year in cooperation with community partners. Field trips for schools and other organizations would occur as requested. Because existing conditions do not allow safe public access to the lighthouse and bell house, during the proposed open public days (first Saturdays), general public access to the lighthouse structure would not be allowed. Lighthouse tours would remain available but limited to guided events and field trips.

Under the Plan, additional public access amenities would be provided as follows: (1) walkways would be improved to increase visitor safety; (2) up to 3 benches would be added to provide seating/picnicking opportunities, and (3) an information kiosk would be installed near the gated entrance to the driveway (Exhibit 4).

Implementing the Plan would also involve invasive plant removal (and replacement with native plants propagated from local stock), which would provide habitat benefits and enhance public views (and, therefore, the quality of the recreational experience). BLM further intends to monitor and adaptively manage the use of the site, to assure resource protection and safe visitor use, and to avoid overcrowding. Adaptive management could lead to proposals to modify rates of usage, install fences or cameras, improve signage, or other measures.

As noted above (page 5), BLM looked at 3 alternative levels of access in developing the Plan, briefly: the proposed Plan, existing conditions (No Project), and a more intense access plan (Alternative 1). This third alternative (depicted on Exhibit 6, and compared to the other alternatives in Exhibit 5) would have involved access to most of the site throughout the year. BLM rejected that more intense alternative for several reasons. BLM has documented that, despite the gate and fencing, past vandalism and illegal use have resulted in damage to the lighthouse, natural resources, and infrastructure. Moreover, in coordinating with Tribal representatives, BLM received expressions of strong concern over threats to spiritual values present at the site, as well as to undocumented physical cultural resources that may be present. The excerpts below from BLM's notes of its July 29, 2016 Government-to-government Consultation Meeting with Yurok Tribe illustrate several of the Tribal concerns raised:

One of the main concerns for the Yurok Tribe is off-trail use. The Trinidad Head is an area where the Yurok people go to pray. Offerings may have been left behind over the years. If the public wanders off-trail, these offerings may be found and taken.

Under Alternative 1, a toilet will be installed. The Tribe prefers that a toilet not be built because its presence would be offensive on sac red ground. If necessary, portable toilets would be a better option for those times when tours and special events take place.

...

In general, The Tribe would like to see visitation kept to a minimum. The conservation can continue in the future as per Adaptive Management. Sarah [Lindgren-Akana] mentioned that her grandfather, from the Yurok Tsurai Village, built the road and trail in the area, so they don't want to keep the public out necessarily, but urge the BLM to be conservative in its approach. There is preservation through education, but public use needs to be done in a thoughtful manner. Cumulative impacts are a concern.

In deference to these concerns, and based on the evidence of damage from past vandalism, BLM selected the less intensive of the two active access alternatives. In addition, as noted above, BLM has incorporated monitoring and adaptive management measures, which could lead to modifications to either further restrict, or increase, visitor use, depending on the monitoring results. BLM has also committed to notifying the Commission staff in the event any changes to access levels or improvements are contemplated or warranted. This agreement allows the Commission to assure, through continuing review under the “reopener” provision of the federal consistency regulations (15 CFR § 930.45), that activities carried out under the Plan will remain consistent with the enforceable policies of the state’s plan (i.e., with Sections 30210 and 30214 of the Coastal Act). Under this provision, further Commission staff (or Commission, if warranted) reviews of Plan modifications and/or changed circumstances could be triggered.

Finally, the Commission staff has requested BLM to agree to work cooperatively with the City and Trinidad Rancheria on any future plans that may improve the efficiency of parking within the unpaved parking area on the north side of Trinidad Head. Although outside the area covered under the Plan, this parking area is the area used for persons accessing the trails on Trinidad Head. Current parking is somewhat haphazard and inefficient, which complicates public access at the times when the lot is used heavily. The City and Trinidad Rancheria are undertaking efforts to improve the drainage from the parking lot, and these improvements may include measures that will have the secondary benefit of improving parking efficiency. Since BLM is improving accessibility to the south side of Trinidad Head, and additional visitors will need to use the parking area for such access, it would further enhance access if the lot could be made more efficient. BLM has agreed to cooperate with the City and Rancheria in pursuit of these efforts.

The Commission finds that BLM’s approach, and the level of access currently contemplated in the Plan, is consistent with the intent of the Coastal Act public and recreation policies to maximize public and access and recreation in a manner consistent with other Chapter 3 policies, (i.e., in a manner considering the resource protection needs of the site). While cultural resources are not specifically called out in Section 30214 of the Coastal Act, as a coastal resource protected under the Coastal Act (see following section of this report), it is understood that cultural resources are among the circumstances to be considered in the part of Section 30214 which mandates that “... public access ... be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case...” The Commission agrees with the precautionary approach adopted by BLM, and that the more active access alternative could, without significant oversight, lead to unacceptable threats to cultural resources.

In conclusion, the Commission finds that the Plan would not result in any public access and recreation burdens, and that the inherent intent of the Plan is to improve public access opportunities at Trinidad Head. The Commission further finds that the proposed Plan represents the appropriate level of access to be implemented at this time, given the specific circumstances and resource constraints at this site. The Commission therefore concludes that the Plan would be consistent with the public access and recreation policies (Sections 30210 and 30214) of the Coastal Act.

D. CULTURAL RESOURCES

Coastal Act Section 30244 states:

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

BLM's Environmental Assessment (EA) describes the extensive cultural values and history at Trinidad Head (Exhibit 7). As noted in the previous section of this report, Trinidad Head is culturally and spiritually significant to the Native American communities in this North Coast region. BLM has also documented that the lighthouse and bell house are historically significant structures, and that they would be maintained in a manner that protects its historic integrity, and in coordination with the State Historic Preservation Officer (SHPO). To fulfill its Tribal Coordination responsibilities, BLM consulted with two federally-recognized Tribes, the Trinidad Rancheria (Cher-Ae Heights Community of the Trinidad Rancheria) and the Yurok Tribe, as well as with the tribal 501(c)3 organization (the Tsurai Ancestral Society). The EA (p. 25 [3rd page of Exhibit 7]) expresses Tribal Representatives' preference for "the Medium Access Option" which the current proposal represents. (See page 5 above, and Exhibit 5 (attached), for a more detailed alternatives comparison.) The reasons behind this preference are also summarized in the previous section of this report above, in which the Commission concludes that the proposed level of access (with Monitoring and Adaptive Management) represents an appropriate balance under the Coastal Act when considering cultural resources. The Commission further finds that this level of access, combined with the Monitoring and Adaptive Management measures described above, can be considered "reasonable mitigation" for cultural resource impacts, for purposes of complying with Section 30244.

In addition, while very limited ground disturbance would occur under the Plan, the Commission notes that BLM has further committed that during any ground disturbance, cultural monitors determined in agreement with the cooperating tribes and the Tsurai Ancestral Society would be present to assure protection of culturally significant resources.

Based on the above discussion, the Commission finds that the Plan would be carried out in a manner which includes reasonable measures and commitments for the protection of archaeological and paleontological resources, and that the Plan would, therefore, be consistent with Section 30244 of the Coastal Act.

E. VISUAL RESOURCES

Coastal Act Section 30251 states:

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.

Trinidad Head is one of the most scenic landform features along California's coast and generally considered a visual resource of both local and statewide significance. In addition to being recognized within both the City and County LCPs as a noteworthy element within the scenic vistas of the Trinidad area, topographically this promontory ranks alongside Point Saint George, Point Arena, Cape Mendocino, Point Reyes, Point Sur, Morro Rock, and Point Dume as one of California's most prominent rocky headlands, on clear days offering wide-sweeping views of tens of miles of adjoining coastline.

While the Trinidad Head Trail already offers a 360 degree panorama of spectacular public views, particularly within the upper elevations of the Head, the opening up of additional access to the lighthouse, at its lower elevations, would provide additional spectacular and unique views of the iconic lighthouse and bell house, as well as ocean and coastal views to and from additional areas of the Head, thereby expanding scenic resource opportunities. Removal of invasive species and replacement with native vegetation would further improve the public viewing experience. Where project features have not been fully designed (such as the information kiosk), BLM will coordinate with the Commission staff to assure they would complement and be compatible with the scenic resources of the site. (As noted on page 8 above, this procedure enables the Commission and staff to assure, through continuing review, that the Plan will remain consistent with the Coastal Act.) With this commitment, the Commission finds the proposed Plan would protect and enhance scenic coastal views, would assure that development on the site continues to remain compatible with the character of the surrounding area, and would, therefore, be consistent with Section 30251 of the Coastal Act.

APPENDIX A

SUBSTANTIVE FILE DOCUMENTS

1. CD-0007-16, BLM Coastal Consistency Determination, Trinidad Head Lighthouse Management Plan.
2. CD-006-83, BLM Consistency Determination, Transfer of 47 acres of Trinidad Head to City of Trinidad.
3. ND-008-14, BLM Negative Determination, Transfer of 13 acre lighthouse property from the Coast Guard to BLM.
4. ND-059-07, BLM Negative Determination, Interpretive Kiosk, Trinidad Harbor.
5. BLM Environmental Assessment #DOI-BLM-CA-N030-2016-0013, Trinidad Head Lighthouse Management Plan.

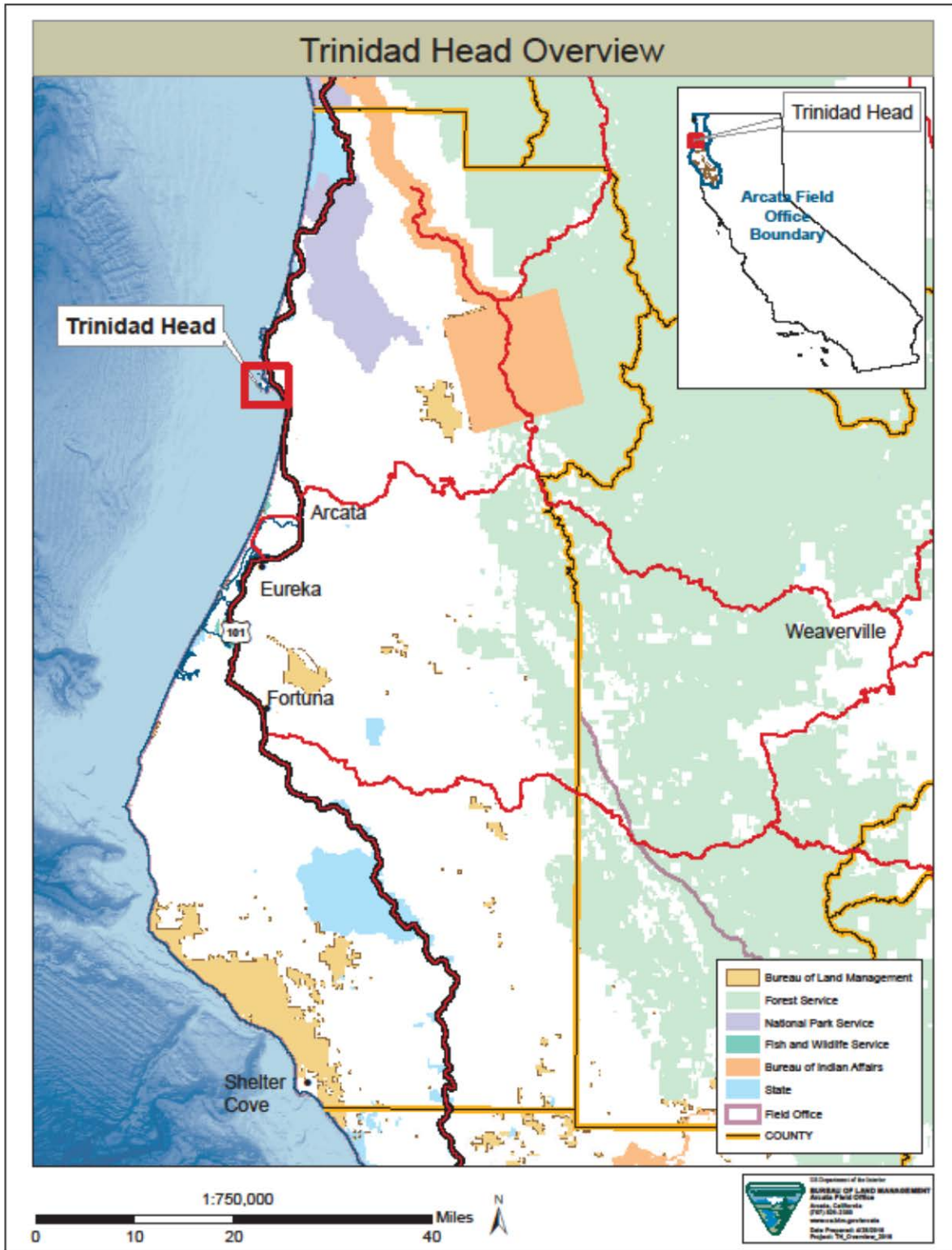


Figure 1. Location of Trinidad Head in northern California.



Trinidad Head Trail

Lighthouse

Bell House

Source: California Coastal Records Project

[Image 201301104](#)

Sep 27 2013

Exhibit 2
CD-0007-16
2013 Aerial Photo

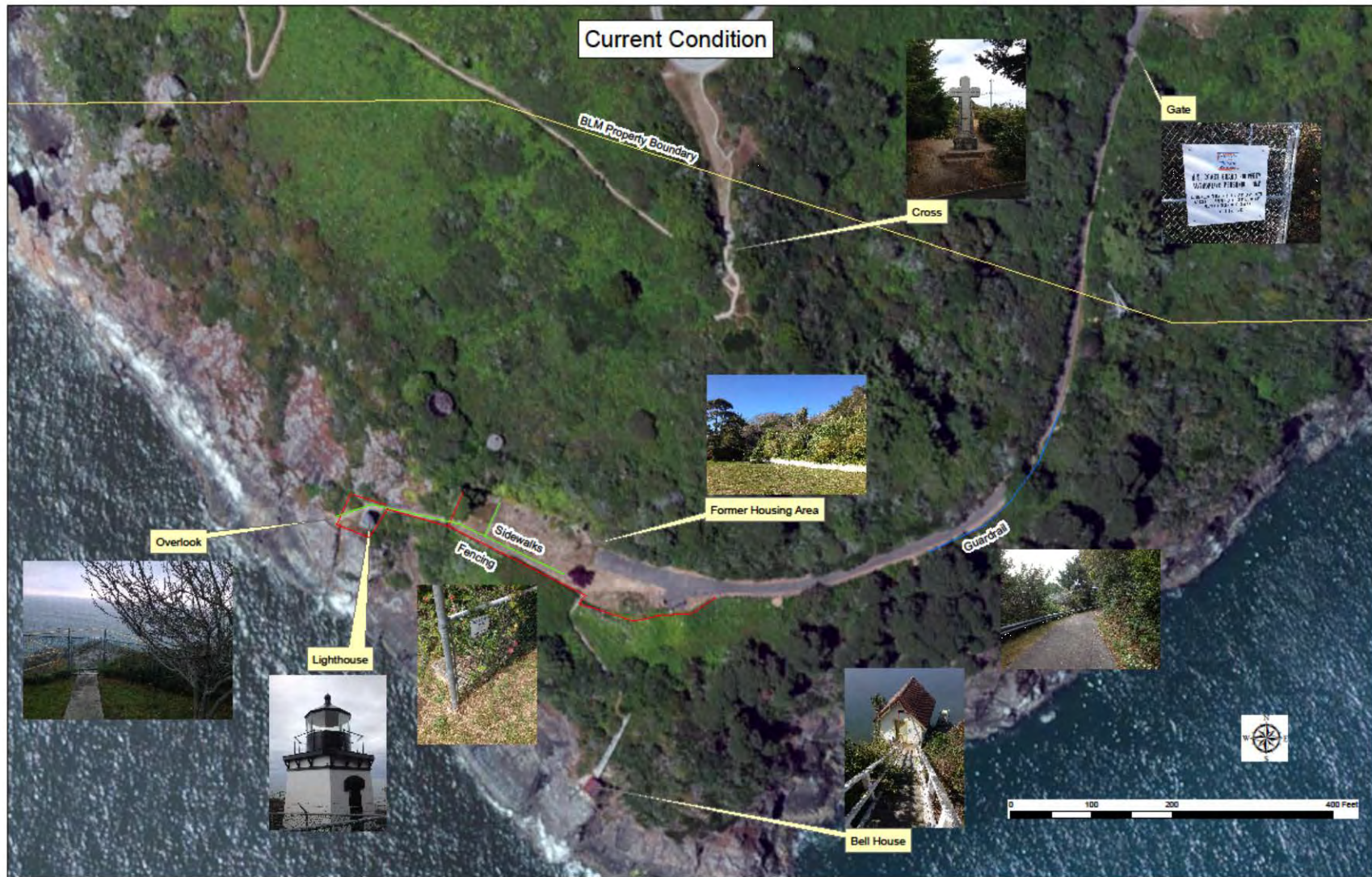


Figure 2. Aerial photograph showing current conditions at the Trinidad Head Lighthouse site.



Figure 3. Aerial photograph showing proposed changes to Trinidad Lighthouse site under the proposed action.

2. Proposed Action and Alternatives

Table 1. Summary and comparison of Proposed Action and Alternatives.

	Proposed Action	Alternative 1	No Action
Access to Site	Portions of the site open to public one day per month plus up to six special events per year. Access via existing driveway only.	Open access to entire site for day use — except to the Lighthouse building and the Bell House building. Access via existing driveway and re-opened connector trail.	Site would remain closed to public except during special events.
Site Improvements	<ul style="list-style-type: none"> • Removal of invasive/non-native plants • Improve visitor safety on existing walkways • Install benches • Improve security of fencing • Maintenance and repairs as necessary for public safety 	<ul style="list-style-type: none"> • Removal of invasive/non-native plants. Add natives • Re-opening of connector trail • Boardwalk and steps to Bell House would be replaced • Fences would be relocated • New viewing platform installed • Permanent spotting scope installed • Obsolete infrastructure removed • Install picnic tables, toilet, trash containers • Existing electrical lines replaced with underground lines. 	Area would continue to be mowed during special events, and historic structures would receive necessary maintenance. Any damage incurred by vandalism or natural events would be repaired as necessary.
Signs	Informational kiosk at gate.	Work with partners to develop interpretive sign plan for Trinidad Head and pier. Install interpretive signs on site.	No signs would be installed
Lighthouse Tours	6 Guided tours per year Additional field trips upon request	Once per month. Additional tours and field trips upon request	Tours would be conducted during planned events.
Special Events	No ceremonies or gatherings would be permitted	BLM would consider permits for ceremonies and celebrations	No special events would be permitted.
Adaptive Management	BLM would monitor vandalism and take measures to prevent damage.	BLM would monitor vandalism and take measures to prevent damage.	Repair damage caused by vandalism as necessary

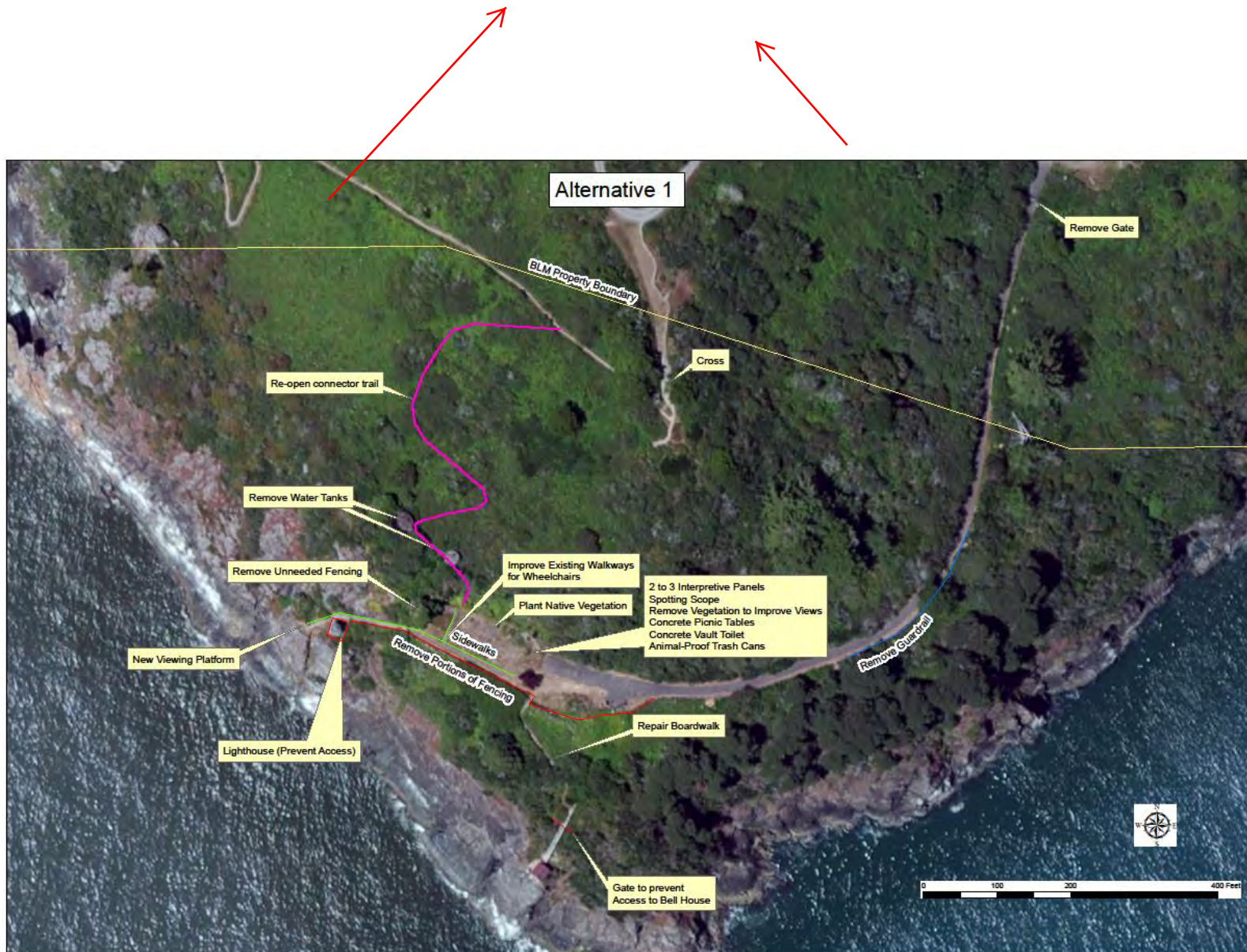


Figure 4. Aerial photograph showing proposed changes to Trinidad Lighthouse site under Alternative 1.

Cultural Resources

The Trinidad Head Lighthouse site contains cultural resources that reflect prehistoric coastal and marine subsistence activity by members of the Yurok tribe, and historic-era maritime activity by European Americans. The most visible cultural materials on the BLM-managed parcel are associated with the operation of a lighthouse that was constructed in 1871.

Prehistoric Overview

Trinidad Head lies within the Yurok Ancestral Territory, and is a place of cultural and spiritual significance to Yurok people. Formal archaeological investigation within the site (the Area of Potential Effects or APE) has been limited to documentation and assessment of the lighthouse and associated structures for inclusion on the National Register of Historic Places. The remaining portion of the parcel has not been formally surveyed for cultural resources due to topographic challenges (steep slopes and cliff sides) and dense vegetation covering the landscape.

Additional cultural resource investigation of the Trinidad Head outside of the APE has been formally conducted in two episodes. In 1976, Pamela Roberts surveyed 42.6 acres of Trinidad Head and a 70 ft. wide by 450 ft. long stretch of land extending from Van Wycke Street to the Coast Guard property boundary for the United States Coast Guard. Roberts reports that only about 10 acres of this survey area were accessible due to thick vegetation or steep slopes. No archaeological sites were found in the surveyed area. A second archaeological survey of Trinidad Head was completed in 1982 by Ann King Smith for the North Coast Land Trust. King Smith also reports that only about 10 acres were accessible for survey. No surface cultural resources were found.

Ethnographic consultation by King Smith (1982) with three members of the Yurok tribe revealed that Yurok people would burn off areas of the vegetation in order to make the area more accessible and to encourage new growth of desirable plants useful for subsistence and that Trinidad Head is one of the most important natural features of the area and is a very significant place to them.

Limited ethnographic and archaeological work completed in the vicinity of the headland indicates that the village of Tsurai (CA-Hum-169) is located on the north shore of Trinidad Bay, about ¼ mile east of Trinidad Head. Tsurai was occupied by the Yurok from about 1620 through 1916 A.D. (Elasser and Heizer 1966:58), with at least seventeen Yurok names attached to the Trinidad Head landform (Waterman 1920:270). Heizer and Mills (1991) report on the archaeological study that took place at the village in 1949 by the University of California Department of Anthropology. This investigation revealed prehistoric- and historic-era layers of deposits. The prehistoric layer contained stone, shell, and bone artifacts that would have been used for hunting or collecting a variety of terrestrial and marine animals, or for gathering and preparing plant materials for food. A Tsurai Management Plan was finalized in 2007 that focused on a 12.5 acre Tsurai Study Area owned by the City of Trinidad. The Yurok village of Tsurai is located within this study area.

Historic-Era Overview

Heizer and Mills (1991) have organized European American settlement periods of the Trinidad area during and beyond the use by the Yurok into three episodes: Discovery and Exploration (1775-1800 A.D.), Exploitation: The Fur Trade (1800-1849 A.D.), and Decline and Fall: The American Invasion (1850-1916 A.D.).

On June 11, 1775, a wooden cross was placed atop the Head by Spanish explorers Don Bruno de Hezeta (Captain of the frigate *Santiago*), and Don Juan Francisco de la Bodega y Quadra (Captain of the schooner *Sonora*) to observe Holy Trinity Sunday. This action led to the naming of the area as Trinidad. A cross made of granite, placed on the northern end of the Trinidad Head landform within the BLM-managed parcel in 1913, commemorates the place where European Americans first proclaimed interest in the area. Trinidad Head is listed in the California Inventory of Historic Resources (1976), and the cross is registered as California Historic Landmark number 146.

During subsequent years, various ships would enter the bay in an effort to establish a knowledge base of uncharted territory, expand affiliated territory, and improve transportation of goods. These efforts led to minor fur trade activity in the early 1800s. But for the most part, visitation to the area would remain sparse and sporadic. It wouldn't be until the effects of the California Gold Rush began to ripple out that a European American presence would take hold in the Trinidad area.

During the year 1850, numerous ships entered the bay. One result of these visits was that on April 8, 1850 a town site was surveyed with several temporary buildings put in place. The town flourished as industry emerged, such as harvesting and transporting lumber. Use of the wharf at Trinidad and elsewhere along the coast raised the need for strategically placed lighthouses. By one report, between the years of 1850 and 1865 at least 25 ships sank off this section of coast. In June 1860, an appropriation was made for forty-two acres on the southern portion of Trinidad Head for the purposes of constructing a lighthouse. The purchase was completed in 1866.

The lighthouse was activated on December 1, 1871. The tower is a square pyramidal shape constructed of stone and brick, at a height of 25 feet with the height of the focal plane above the ocean set at 196 feet. The original optic was Fourth Order, Fresnal; this optic was replaced in 1947 with a 375 mm optic and the original optic was donated to the Trinidad Civic Club for display in a Memorial Lighthouse at the base of Trinity Street on the Trinidad Bay. The lighthouse was listed on the National Register of Historic Places (#91001098) in 1991, and is described in the National Park Service Inventory of Historic Light Stations (1994). The National Register nomination identified four periods of significance: 1850-1874, 1875-1899, 1900-1924, and 1925-1949 under the themes of Commerce, Transportation, Maritime History, and Architecture.

An accessory structure on the Head is the Bell House/fog signal building constructed in 1900. It is frame construction and it housed the fog bell, until a compressed air horn replaced the fog bell in 1947. This building is included as a contributing building on the National Register of Historic Places listing. The operation of the fog bell required being struck by a bell hammer that was controlled by a clockwork mechanism powered by weights. After an incident where the weights broke loose and fell down the cliff, a weight tower was attached to the building. This tower is no longer present; however, a

hole is seen in the fog signal building where the clockwork mechanism connected to the bell hammer. The fog bell is now suspended from a wooden framework adjacent to the Memorial Lighthouse. According to research conducted by personnel at the Trinidad Museum, the Trinidad Fog Bell House is the only remaining bell house in California.

Housing quarters for the lighthouse keeper were located 150 feet southeast of the lighthouse and consisted of a white frame two-story house. An addition to the house in 1911 that mirrored the existing structure nearly doubled its size. A barn completed the housing complex. The housing footprint changed in 1961 when the historic house and barn were razed and a modern triplex was built by the U.S. Coast Guard.

Water was supplied by capturing and storing rainwater from the roof. Often, rainwater alone would not meet the culinary water needs and water was hauled in by truck or ship. Later, a natural water spring was located that augmented the rainwater and hauled water supply. In 1960, a water line was laid from the city of Trinidad to the housing area.

The housing complex built in the 1960s to replace the original keeper's house was evaluated in 1991 as not contributory to the site's eligibility for listing on the Register. The triplex housing structure was removed by the U.S. Coast Guard in 2007. The remaining visible features associated with the housing complex include two wooden water tanks placed upslope from the housing quarters and portions of the sidewalk that extended from the house to the lighthouse. The U.S. Coast Guard relinquished the Lighthouse and 13 acres of land, but not the Bell House, to the BLM in 2014.

The land parcel has not been the subject of a Class III Intensive Cultural Resource Inventory. A surficial survey would be difficult, if not impossible, to conduct on the steeply sided, heavily vegetated area, as noted by Roberts (1976) and King (1982) when they conducted archeological inventories on adjacent land on the Head.

Past constructive and destructive activity has disturbed the lighthouse/bell house/housing area to such an extent that the likelihood of encountering intact, prehistoric cultural materials while implementing the proposed action is minimal. Nonetheless, there may be remnant historic-era and more deeply buried prehistoric-era materials in the lighthouse/bell house/housing area. However, any historic-era materials that might be encountered are considered to be non-contributory to the property as listed on the National Register.

Tribal Concerns

Two federally recognized tribes (the Yurok tribe, and the Cher-Ae Heights Indian Community of the Trinidad Rancheria) and one tribal 501(c)3 organization (the Tsurai Ancestral Society) have participated in the development of the California Coastal National Monument Trinidad Gateway Project Strategic Plan and have contributed comments pertaining to the Trinidad Head Management Plan.

According to a statement issued by the Trinidad Rancheria Tribal Council (2/28/2013), the Trinidad Head is known by the name Tsurewa, or Chue-rey-wa in the new Yurok alphabet. With regard to the development of alternatives for the Trinidad Head Lighthouse Management Plan, the Tribal Council has stated it "would like to see a Medium Access Option in lieu of the High or Low Access" and offered specific

recommendations about Events/Access, Security, Facilities/Amenities, and Environmental components (letter dated 12/8/2015).

The Tsurai Ancestral Society represents descendants of the Trinidad Head Tsurai Village, and they have expressed concern about the effects of past development of the Head and that future “development of any kind is sure to disturb both cultural and natural resources...”.

The BLM will build on the positive relationship it enjoys with these tribes and continue to solicit input on management of the Trinidad Head.

4. Environmental Effects – Direct, Indirect and Cumulative

Proposed Action

Direct and Indirect Effects

Vegetation and Invasive, non-native plants

Native vegetation would be enhanced under the Proposed Action through gradual removal of competing and invasive, non-native plant species; followed by natural recovery by native plants. Supplemental plantings of locally sourced, native plants consistent with the flora found on Trinidad Head would further enrich vegetation enhancement. Losses of native vegetation is unlikely to occur, but there could be short-term, localized native plant damage associated with invasive, non-native plant removal efforts when native plants are intermingled with the target weeds. There would be no impact to coast Indian paintbrush plants as any manual treatment efforts would avoid them as well as any nearby native plant species that may be hosts.

Recreation

In addition to continuing access through planned events and field trips, the proposed action would allow public access to the site during daylight hours at least once per month. The planned events held in 2015 that included lighthouse tours and educational presentations drew large numbers (200-400) of visitors and it is expected that such events in the future would draw a similar number of visitors. The regularly scheduled monthly access (first Saturday of each month) to the site would restrict the public to the former housing area and not allow access to the lighthouse or include the educational presentations. It would be expected that, during fair weather, visitation to the site would increase but the magnitude of increased visitation is uncertain. After the first one to two years, a decrease in visitation may be experienced on the local/regional basis; however, an increase in visitation could occur on the national and international agenda as tourism boards become more aware of the lighthouse schedule.

Increased frequency of access to the site could increase the number of opportunities visitors would have to enjoy coastal vistas and views of the lighthouse. Increased