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STAFF REPORT: REGULAR CALENDAR

Consistency Determination No.: **CD-0002-26**

Applicant: **United States Navy**

Project Location: Naval Base Ventura County Point Mugu, Ventura County

Project Description: Flood protection infrastructure and drainage improvements to reduce standing water in the areas surrounding the runway.

Staff Recommendation: Concurrence

SUMMARY OF STAFF RECOMMENDATION

Naval Base Ventura County (NBVC) Point Mugu consists of 4,486 acres along six miles of coast and is located in unincorporated Ventura County, south of the City of Oxnard between Pacific Coast Highway and the shoreline (**Exhibit 1**).

The purpose of the project is two-fold. First, to improve existing flood protection infrastructure to help NBVC facilities better withstand more intense erosion and flood events, up to and including a 100-year flood event (1% annual probability of occurrence). These improvements include repairs to an eroding embankment along Main Road and the addition of interconnected concrete blocks to the adjacent channel bottom, replacing a non-functional tide gate and pump station with new units, installing a concrete wall along portions of Las Posas Road, and regrading the surface of Las Posas road and replacing adjacent culverts and tide flaps.

Second, to help reduce the presence of standing water – and associated bird use – in close proximity to an existing aircraft runway. The topography and hydrology of NBVC, in conjunction with legacy, non-functional man-made drainage features, causes several locations at NBVC in the area surrounding the aircraft runway to be prone to retaining standing water for extended periods of time. Standing water at these locations can attract various species of birds, and birds flying in and around these areas can create a collision and flight hazard risk for aircraft using the runway at NBVC. Improvements to the drainage features as part of the proposed project—including concrete channelization, installation of one-way hydraulic control structures, and removal of a non-functional tide gate—would help to prevent standing water and thus reduce the likelihood of birds being in the area of the runway.

Due to the nature of the project, most of the proposed work sites are within wetlands. Coastal Act Section 30233 allows development in wetlands only if it is for an allowable use, there is no feasible less environmentally damaging alternative, and mitigation measures have been provided to minimize adverse environmental effects. While not all elements of the proposed project are for allowable uses identified in Section 30233, the proposed structures can be permitted under Section 30235, which allows for certain protective structures to be built, if certain criteria are met, even if they are inconsistent with Section 30233 or other Coastal Act provisions. This override does not, however, negate meeting other Section 30233 requirements as much as possible, including that the project be the least environmentally damaging feasible alternative, and that the project includes feasible mitigation measures to minimize adverse environmental effects.

The Navy considered alternatives at each of the sites and found that they would result in increased impacts to wetlands or were infeasible, and Commission staff agree with this analysis. Finally, the project includes mitigation measures including creation of a wetland mitigation bank for permanent impacts to wetlands, stormwater Best Management Practices (BMPs), wildlife monitors onsite during project activities, and two years of weed removal from disturbed areas to help native plant species recover.

Coastal Act Section 30253 requires new development to minimize risks to life and property in hazardous areas, while Section 30235 allows the construction of shoreline protective devices when they are required to protect existing structures. The Navy has previously implemented hazard mitigation approaches at NBVC, including managed retreat, abandoning vulnerable structures, and shoreline armoring, while also working on evaluating longer term strategies. The Navy recently completed a vulnerability assessment of NBVC to identify critical and threatened facilities and infrastructure, and to also identify appropriate and feasible hazard adaptation strategies. Segments of Las Posas Road and the runway were identified as existing critical structures that cannot be relocated or abandoned at this time. The proposed project would include a flood wall along Las Posas Road to help it better withstand flood forces while the proposed tide gate and pump station would help NBVC better manage surface water and floodwater within the base.

The Navy determined that there are no known archaeological resources within or adjacent to the project area. However, archaeological and tribal monitoring will be required for initial ground disturbing activity associated with the proposed undertaking in areas of provisional archaeological sensitivity.

The staff therefore recommends that the Commission concur with Consistency Determination CD-0002-26. The standard of review is consistency to the maximum extent practicable[1] with the enforceable policies of the California Coastal Management Program (i.e., Chapter 3 policies of the Coastal Act). The motion to concur is on page 5 of this report.

[1] 15 CFR Section 930.32(a)(1) defines the term consistent to the maximum extent practicable to mean "fully consistent with the enforceable policies of management programs unless full consistency is prohibited by existing law applicable to the Federal agency".

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I. FEDERAL AGENCY'S CONSISTENCY DETERMINATION

The Navy has determined that the proposed action (CD-0002-26) would be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program (CCMP).

II. MOTION AND RESOLUTION

Motion:

> I move that the Commission concur with Consistency Determination CD-0002-26 on the grounds that that the project described therein would be fully consistent, and thus consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program (CCMP).

Staff recommends a **YES** vote on the motion. Passage of this motion will result in a concurrence with the Navy's determination of consistency. 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-0002-26 on the grounds that the project would be fully consistent, and thus consistent to the maximum extent practicable, with the enforceable policies of the CCMP.

III. APPLICABLE LEGAL AUTHORITIES

Standard of Review
The Commission's federal consistency review is guided by provisions of the federal Coastal Zone Management Act (CZMA) and by the approved California Coastal Management Program (CCMP), as described below. The CZMA (16 U.S.C. § 1451-14645 requires that federal agency activities affecting coastal resources be "carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved State management programs." Id. at § 1456(c)(1)(A).

As stated in California's federally-approved Coastal Management Program (CCMP):

> The California Coastal Management Program is a combination of Federal, State, and local planning and regulatory authorities for controlling the uses of land air and water resources along the coast. For the purposes of meeting CZMA requirements, the management program for the main coastline segment described in this document is the major component of a two-segment program, San Francisco Bay being the smaller segment. … The California Coastal Management Program for the main segment of the State's coastline includes the … California Coastal Act of 1976.

Furthermore, page 14 of the CCMP states:

> Section 30008 of the Coastal Act states that, "This division the California Coastal Act shall constitute California's coastal zone management program within the coastal zone for purposes of the Federal Coastal Zone Management Act of 1972". However, the CCMP is not necessarily limited to the Coastal Act itself because Section 30009 of the Act provides that, "This division shall be liberally construed to accomplish its purposes and objectives." It is clear that one of the purposes and objectives of Section 30008 is to declare the Legislature's intention that California's coastal management program satisfy the CZMA requirements for a state coastal management program. Any interpretation of Section 30008 that would preclude any component either necessary for program approval or advantageous to the implementation of the program from being included as part of the CCMP (e.g., Coastal Commission regulations, national interest statement, supporting legislation, etc.) would be in violation of Section 30009.

Consistent to the Maximum Extent Practicable
The implementing regulations for the CZMA ("federal consistency regulations"), at 15 C.F.R. § 930.32(a)(1), define the phrase "consistent to the maximum extent practicable" to mean:

… fully consistent with the enforceable policies of management programs unless full consistency is prohibited by existing law applicable to the Federal agency.

This standard allows a federal activity that is not fully consistent with the enforceable policies of the CCMP to proceed, if full consistency with the enforceable policies of the CCMP is "prohibited [by] existing Federal law applicable to the Federal agency's operations".[2] The Navy did not state in its consistency determination that full consistency with the enforceable policies of the CCMP would be prohibited by existing Federal law. Since the Navy has raised no issue of practicability, as so defined, the standard before the Commission is full consistency with the enforceable policies of the CCMP, which are the policies of Chapter 3 of the Coastal Act (Cal. Pub. Res. Code §§ 30200-30265.5).

IV. FINDINGS AND DECLARATIONS

A. Background and Project Description

Naval Base Ventura County (NBVC) Point Mugu consists of 4,486 acres along six miles of coast and is located in unincorporated Ventura County, south of the City of Oxnard between Pacific Coast Highway and the shoreline (**Exhibit 1**). NBVC was constructed in the early 1940s to stage, train and supply the Navy Construction Battalion (Seabees). Now, NBVC provides airfield, seaport, and base support services to units of the Pacific

[2] 15 CFR Section 930.32

Fleet engaged in testing and training activities on the Point Mugu Sea Range and to tenant commands and shore activities with operations onboard the installation.

The Navy describes the purpose of the project in the Draft Environmental Assessment (EA) as follows:

> The purpose of the Proposed Action is to ensure NBVC Point Mugu facilities and critical infrastructure, including base housing, are able to withstand flood intensities that would be expected to occur once in 100 years (i.e., a 1 percent chance of occurring each year), withstand increasing frequency of extreme weather events... The Proposed Action is needed because the existing flood protection infrastructure is inadequate to protect installation facilities against even moderate intensity 10-year flooding events.

In addition, as a result of the topography and hydrology of the site, in conjunction with legacy, non-functional man-made drainage features, several locations at NBVC in the area surrounding the aircraft runway are prone to retaining standing water for extended periods of time. Standing water at these locations can attract various species of birds and birds flying in and around these areas can create a collision and flight hazard risk for aircraft using the runway at NBVC. Improvements to the drainage features that would help to prevent standing water are thus also proposed in order to reduce the likelihood of birds being in the area of the runway.

The project would consist of six individual components and two laydown areas located entirely within the perimeter of NBVC. The components are identified below.

Site 1 – Main Road Channel (Flood Control)
Site 1 would be located along the eastern side of Main Road, beginning at an existing outlet structure of a stormwater pipe and ending at the confluence of Oxnard Drainage Ditch (ODD) No. 2 (**Exhibit 2**). The existing concrete embankment along this section of Main Road would be removed and the soil of the embankment would be compacted. Next, concrete mats consisting of individual, articulating and interconnected blocks would be installed along the channel floor.

Site 2 – Tide Gate PM-143 and Las Posas Pump Station Replacement (Flood Control)
Site 2 is located at the confluence of ODD No. 2 and Calleguas Creek (**Exhibit 2**). The existing nonfunctional tide gate facilities would be demolished and removed, including all steel slide gates and associated concrete structures down to the foundation. The existing pump facilities, including pumps, motors, electrical controls, piping, and associated control building, would also be demolished.

Construction for the new tide gate would include a new concrete foundation, concrete flood walls, and motor-operated, cast-iron tide gates. The project would also include construction of a new, 60-foot-wide by 95-foot-long reinforced pump station utility structure with a trash rake supported by piles. Concrete aprons lined with rock rip rap would be constructed at the discharge of the pump station to slow the flow of discharge

water into Calleguas Creek and prevent erosion. Finally, concrete channel walls and modular concrete blocks would be installed within the channel to protect against erosion from increased pumping flow velocities.

In the area adjacent to the pump station, a new 30-foot-long by 12-foot-wide control building would be constructed to house tide gate and pump controls and equipment. Construction of the control building would require importing fill followed by grading to level the ground for the foundation as well as construction of a new gravel road.

Site 2A – Underground Electrical Line (Flood Control)
A new 16.5 kilovolt underground electricity line would be installed under portions of roads within NBVC to power the tide gate at PM-143. The line would include approximately 8,000 feet of new underground duct bank and 26 new manholes.

Site 3 – Las Posas Flood Barrier (Flood Control)
A 3,800-foot-long, five-foot-high concrete wall would be constructed between Calleguas Creek and Las Posas Road (**Exhibit 2**). The wall would be either an inverted “T-wall” (a retaining wall with a stem that increases in length as the wall height increases) or a moment slab with a toe wall that would consist of a reinforced concrete base and a reinforced concrete wall supported on sheet piles. To construct the wall, the site would be prepared by removing vegetation, followed by excavating and grading the soil. Sheet piles would be installed via either vibration, digging, or water jetting, and followed by installation of the concrete foundation and wall.

Las Posas Road would be regraded by removing portions of the existing road and importing fill material to raise the grade. Next, asphalt and road striping would be applied, followed by replacement of existing storm drain culverts with canal gates that would close during flood conditions but remain open during normal conditions to allow for tidal recharge of the adjacent wetlands.

Site 4 – Hydraulic Control Structure Near Taxiway (Bird Flight Hazard)
A one-way hydraulic control structure would be installed at the confluence of an existing drainage channel and ODD No. 2, to reduce the presence of standing water. The control structure would have a one-way flap gate and articulated concrete blocks located both upstream and downstream of the gate. Construction would include vegetation clearance, grading and minor excavation to install the control structure.

Site 5 – Perimeter Road Drainage (Bird Flight Hazard)
The existing 1,850-foot-long earthen swales along the southern side of Perimeter Road and Taxiway G would be graded and new concrete lined swales would be installed (**Exhibit 2**). The existing earthen drainage channel would be repaired and a concrete headwall with hydraulic control structure would be installed at the confluence of ODD No. 2 and the drainage channel. Mats of articulated concrete blocks would be laid upstream and downstream of the hydraulic control structure to protect against erosion. The existing wetland area between the concrete lined swales would be raised and regraded with fill material to facilitate the flow of stormwater. Earthen slopes

surrounding the study area would be revegetated for permanent erosion control after construction is complete.

Sites 6A and 6B – Tide Gates PM-844 and PM-845 (Bird Flight Hazard)
These two existing tide gates are no longer functioning and contribute to constant sources of standing water (**Exhibit 2**). At PM-844, the existing tide gate, sheet walls, piles, and concrete would be demolished while existing utilities for the tide gate would be protected in place. At PM-845, the structural concrete central wall and catwalk would be demolished. The existing concrete foundation and wingwalls would remain in place.

Construction Laydown Areas
The project would require two construction laydown areas which would be entirely within existing disturbed areas that currently function as a standing area and/or a parking lot.

B. Consultations and Other Agency Approvals

United States Army Corps of Engineers

An Individual Permit will be submitted to the U.S. Army Corps of Engineers (USACE) to authorize the discharge of dredged or fill material into jurisdictional waters. In accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, a Stormwater Pollution Prevention Plan (SWPPP) would be also prepared. Commission staff had a call with USACE staff to discuss potential adverse impacts to wetlands and how impacts could be mitigated.

Tribal Outreach and Consultations

Commission staff conducted outreach to Tribes with potential cultural affiliation to the project site, as identified by the Native American Heritage Commission. These Tribes included the Barbareño/Ventureño Band of Mission Indians, the Coastal Band of the Chumash Nation, the Northern Chumash Tribal Council, and the Santa Ynez Band of Chumash Indians. Commission staff sent emails and letters to these Tribes on May 11, 2026, to share project information and invite consultation. A member of the Barbareño/Ventureño Band of Mission Indians responded on May 11, 2026. The outcome of this consultation is discussed further in Section F of this staff report.

C. Wetlands and Environmentally Sensitive Habitat Areas

Section 30233 of the Coastal Act states (in relevant part):

> (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:
>
> > (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.

(2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.

(3) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

(4) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

(5) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.

(6) Restoration purposes.

(7) Nature study, aquaculture, or similar resource dependent activities.

Section 30107.5 of the Coastal Act states:

"Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

Section 30240 of the Coastal Act states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Wetlands

The Coastal Act recognizes that wetlands, estuaries, and adjacent habitat are important coastal resources, supporting numerous wildlife and plant species. California’s coastal wetlands provide spawning, nursery, and foraging areas for more than 50 species of marine fish, many of which are important to the sport and commercial fishing industries. Coastal wetlands are also essential wintering habitats for many species of migratory shore birds and waterfowl that use these areas during annual migrations. Finally,

coastal wetlands are also important because they provide habitat for many state or federal special status species.

Outside of San Francisco Bay, Mugu Lagoon on NBVC ranks among the largest coastal wetland systems in California. It provides one of the few surviving examples of the diverse and highly productive salt marsh lagoon ecosystems that once flourished in many areas along the southern California coastline. Over 250 species of plants are present and more than 300 species of birds use the area year-round or seasonally. The lagoon and tidal channels support a diverse benthic invertebrate fauna and at least 39 species of fish. Adjacent uplands provide habitat for over 40 mammalian species, as well as several reptiles and a number of federally and state-listed threatened and endangered bird species, including the light footed clapper rail, the California least tern, the Western snowy plover, and the Belding's savannah sparrow. Many of these plant and animal species also occur in other wetland and shoreline areas within the southern California coastal zone and would be adversely affected by the loss of wetland, mudflat or tidal channel habitat within the Mugu Lagoon complex. Thus, the Commission has historically considered Mugu Lagoon, its sloughs and wetlands to be coastal resources subject to protection under Section 30233[3].

The Commission has also historically determined that the disturbance or loss of wetlands on federal lands in coastal areas, such as at Point Mugu, constitute adverse impacts on coastal zone resources. The endangered and sensitive species observed in the area are experiencing declining numbers throughout the state due to human impacts and habitat loss. Suitable habitat niches in the coastal zone may already be occupied or only able to support a limited population of these species. Loss or disturbance of habitat will further reduce the species' ability to persist. By virtue of its being on the Pacific Flyway, Mugu Lagoon is also essential habitat for migrating coastal species and other species which spend much if not most of their lives in the coastal zone.

Although the Navy has not included detailed information about the type and intensity of potential adverse impacts to wetlands resulting from its proposed project or specific wetland habitat impact area totals for each project component, analysis of available information by Commission staff indicates that approximately 15 acres of wetlands may be disturbed, degraded or lost as a result of the proposed work.

Proposed project elements within wetlands include those at Sites 1, 2, 3, 4, 5, 6A and 6B. As such, this proposed work is subject to the requirements of Coastal Act Section 30233(a): (1) an allowable use test; (2) an alternatives test; and (3) a mitigation test.

Allowable Use

The first requirement of Section 30233 is that the proposed activity must fit into one of the seven listed categories (i.e.; the “allowable use” test), one of which is an "incidental public service purpose.” In the draft EA, the need for the hydraulic control structures,

[3] CD-021-97

drainage channel repairs and regrading and tide gate removals proposed for Sites 4, 5, 6A and 6B is described as follows:

> In addition to direct damages to base facilities and infrastructure from flooding, poor drainage due to human-made modifications to the areas surrounding the airfield can result in the ponding of excess water. Standing water caused by storm events, agricultural irrigation runoff from offsite areas, or high tides can provide an ideal habitat for birds to nest and breed; which can create an increased Bird/Animal Aircraft Strike Hazard risk. Additionally, installation flight operations are altered in an effort to minimize strike risk during periods of high bird activity, which has a direct impact on current operations and degrades mission effectiveness.

Because those components of the project will be constructed by a public agency (US Navy) in order to reduce the possibility of bird strikes and safely maintain base operations in service of its mission to the public, the fill at these sites qualifies as a public service purpose. The Commission has previously approved fill in wetlands when no other alternative exists and the fill is necessary to maintain the existing capacity of roads, airports,[4] or similar transportation infrastructure. Here, the proposed improvements are incidental to maintaining the existing runway. None of the existing parameters of the runway will change as a result of the project, including the current capacity. As such, the project components at Sites 4, 5, 6A and 6B meet the first test of Section 30233(a).

At Site 1, the project would remove an existing concrete embankment located along the eastern side of Main Road, the soil of the embankment would be compacted and closed cell articulating block mats would be installed along the floor of ODD No. 2. As described by the Navy, this development is intended to help prevent erosion at this location, which if left unaddressed could threaten the stability of the embankment and thus this segment of Main Road. The work is intended to maintain the use of Main Road in service of its mission to the public, and thus the proposed fill qualifies as a public service purpose. The Commission has previously approved fill within wetlands, including for roads[5], when no other alternative exists and the fill is necessary to maintain existing capacity. The proposed development at Site 1 is incidental to the maintenance of a segment of Main Road, and none of the existing parameters of the road will change as a result of the project, including the current capacity. As such, the development at Site 1 meets the first test of Section 30233(a).

The purpose of the proposed development at Sites 2 and 3 is to improve flood protection for segments of Las Posas Road and 13th Street and other infrastructure located throughout NBVC. Although the development at Sites 2 and 3 would help to ensure that NBVC is able to better withstand flood events in service of its mission to the public, the “incidental” is defined, in part, as being directly connected with something, or

[4] CC-058-01
[5] CD-084-04

being of a minor or subordinate nature.[6] Here, the development at Sites 2 and 3 is not incidental, or more directly connected, to the maintenance of specific infrastructure that is adjacent to the areas to be filled. Rather, it is intended to address protection of a broader area across NBVC. Likewise, the fill is not a minor or subordinate consequence of conducting erosion control work on a specific roadway, bridge replacement work, or the like—which are the types of incidental fill that the Commission has previously permitted under this allowable use. Rather, the main purpose of the fill is to create an entirely new shoreline wall that will protect a variety of infrastructures from flooding, erosion, and damage. In addition, the work includes construction of a new gravel access road. The Commission does not consider fill of wetlands to be an incidental public service purpose if it is being used to expand roadway or infrastructure capacity, rather than just maintain existing operations. As such, the development at these sites does not meet the definition of an incidental public service under Section 30233(a)(4). Also, it does not qualify as one of the other seven enumerated and allowed uses and types of uses or development within wetlands. As such, the proposed wetland fill at Sites 2 and 3 is inconsistent with Section 30233(a).

However, as discussed below in Section IV.D (Hazards and Shoreline Protection), Coastal Act Section 30235 provides more specific direction about the circumstances in which shoreline protection structures, such as the flood protection structures proposed at Sites 2 and 3, are allowed, and states that such structures shall be permitted when required to serve coastal-dependent uses or to protect existing structures and when they have been designed to eliminate or mitigate adverse impacts. In other words, if the proposed flood protection structures meet the tests for approval under Section 30235, they can be found consistent with the CCMP despite their inconsistency with the allowable use test of Section 30233(a). As discussed below, this “override” applies to this case.

This override does not, however, negate meeting other Section 30233 requirements as much as possible, including that the project be the least environmentally damaging feasible alternative, and that the project includes feasible mitigation measures to minimize adverse environmental effects.

Alternatives

For the second test of Section 30233(a), the Commission must find that there are no feasible, less environmentally damaging alternatives to the proposed fill and dredging of wetlands.

Site 1 proposes development to help prevent erosion along a segment of Main Road. In a report prepared by the Navy, [7] infrastructure within NBVC was assessed to determine its current vulnerability and whether it can be abandoned and/or relocated. In that

[6] https://dictionary.cambridge.org/us/dictionary/english/incidental, https://ahdictionary.com/word/search.html?q=incidental.

[7] https://www.scienceforconservation.org/assets/downloads/NBVC_CoastalAdaptationVision_TechnicalReport_FINAL.pdf

report, the Navy determined that Main Road remains vital to the operation of the base and cannot be abandoned and/or relocated at this time. The design at Site 1 calls for placement of articulated and interconnected concrete mats to prevent erosion, and while alternatives such as soil or gravel could potentially result in less fill of wetlands, they would not be effective in reducing erosion at the site. Similarly, other alternatives, such as placing riprap, may effectively prevent erosion but would not avoid or reduce the amount of fill, and would more significantly alter the shape and function of the channel bottom.

As an alternative to the proposed tide gate and pump station replacement at Site 2, the Navy considered three small tide gates and pump stations placed at strategic locations within NBVC. These included the channel near the Santa Rosa housing development, the channel near the San Miguel housing development, and the intersection of ODD No. 2 and Calleguas Creek. Three tide gates and pump stations were found to be infeasible because they would have required greater upgrades to the electrical distribution infrastructure within NBVC and greater logistical demand on NBVC maintenance. Additionally, one single pump station that is appropriately sized to manage flows would have an overall smaller footprint and fewer adverse impacts to wetlands, compared to three pump stations.

At Site 3, the Navy analyzed constructing an earthen berm as opposed to the proposed concrete wall. However, because an earthen berm would require a greater width compared to the concrete wall, it would extend further into the adjacent wetlands and thus result in greater adverse impacts to wetlands.

In designing the proposed drainage improvements at Sites 4 and 5, the Navy considered several alternatives, including re-grading the infield areas of the airfield and constructing a concrete catchment apron along Perimeter Road. In its analysis, the Navy determined that re-grading the infield areas of the airfield would result in additional adverse impacts to wetlands compared to the proposed project. Additionally, the Navy found that constructing a concrete catchment apron along Perimeter Road would result in the placement of a larger area of impervious concrete and more vegetation removal and wetland fill than the proposed drainage improvements.

At Sites 6A and 6B existing, non-functional tide gates would be removed and no new development is proposed. Since these components of the project would include removing development from within wetlands and allowing the sites to return to a more natural state, an analysis of alternatives for these components is not necessary.

The Commission agrees with the analysis in the Navy's report and therefore finds that the proposed project is the least environmentally damaging feasible alternative, as required by Section 30233(a).

Mitigation

The third test of Section 30233(a) requires that feasible mitigation measures be provided to minimize the project's adverse environmental effects.

To minimize adverse impacts to wetlands, the project would include various avoidance and minimization measures. Vegetation clearing activities would take place outside of the bird nesting season. Biological monitors would be present onsite during project activities. Work would halt if sensitive species are identified within the project area and could be adversely impacted by work activities. As described above in the alternatives analysis, the project was also designed to use materials and locations where the amount of wetland fill could be minimized. In addition, the Navy would continue to implement the broad, base-wide wildlife and habitat protection and enhancement strategies outlined in the NBVC Integrated Natural Resources Management Plan (INRMP) as well as two years of weed treatment after project activities are complete to help facilitate the recovery of native plants within areas where work occurred and resulted in vegetation disturbance or removal.

The project could result in adverse impacts to upwards of 15 acres of wetlands and the Navy has committed to implementing wetland mitigation for those impacts as part of the authorizations it is currently seeking from the U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB). Based on coordination carried out between Commission and USACE staff, the USACE Individual Permit is expected to include compensatory mitigation in the form of wetland restoration and/or enhancement at ratios appropriate to the type, duration and intensity of impact as well as performance criteria and monitoring requirements to help ensure impacts are effectively mitigated. The Navy is also in the process of developing a NBVC Wetland Mitigation Bank to be used for compensatory mitigation for mission-related impacts to wetlands within NBVC, including the proposed project. The Navy has stated that it would draw on this mitigation bank to compensate for the adverse impacts of the proposed project. The bank is being developed by an Interagency Review Team (IRT) consisting of multiple federal agencies and the RWQCB. The IRT would develop the legal framework of terms and conditions, regulations, and procedures for operation and management of the bank. The Navy would then be responsible for securing funds for operation and maintenance of the bank as well as long-term management of the wetland habitats. The Navy has stated that it will obtain all appropriate environmental documentation, permits, or other authorizations needed to establish restoration sites and maintain the bank, which could include CZMA authorization.

At the current time, the proposed bank is expected to consist of nine wetland restoration sites that are currently in different phases of restoration. Two of the nine sites have been approved by the USACE to be active in the bank. In addition to the bank sites, there are 8.87 acres of completed restoration sites on NBVC proposed for credit entry into the bank and the Navy is in the process of securing credit for these past restoration efforts.

As such, it is the Commission’s expectation that impacts to wetlands would be fully mitigated at ratios consistent with those typically required by the Commission. To help ensure this, the Navy has agreed to continuing coordination with Commission staff regarding the final acreage of adverse impacts to wetlands resulting from the project,

the status and development of the wetland mitigation bank, and the use of the bank to mitigate for adverse impacts to wetlands.

Conclusion
The project would occur in and is anticipated to result in some adverse impacts to wetlands. These impacts are allowable because the portions of the project meet the three-part test of Section 30233, and those components that do not are nonetheless allowable because they are consistent with the override provisions of Coastal Act Section 30235, as described in Section IV.D, below.

Based on the available information regarding habitat classifications and vegetation communities in the CD submittal, the draft EA, the NBVC INRMP and a 2014 NBVC vegetation classification and mapping report, it does not appear that ESHA is present within the proposed project disturbance areas or that the project would result in adverse impacts to ESHA.

Therefore, the Commission finds that the project is consistent with the wetland protection provisions of Section 30233 of the Coastal Act and the ESHA protection provisions of Section 30240 of the Coastal Act.

D. Hazards and Shoreline Protection

Section 30235 of the Coastal Act states:

> Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fishkills should be phased out or upgraded where feasible

Section 30253 of the Coastal Act states (in relevant part):

> New development shall do all of the following:
>
> a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
>
> (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.
>
> …

Coastal Act Section 30253 requires new development to minimize risks to life and property in hazardous areas while Section 30235 allows the construction of shoreline protective devices when they are required to protect existing structures[8]. One of the primary objectives of the project is to ensure that NBVC Point Mugu facilities and infrastructure can better withstand current and future flooding with increasing frequency and severity of extreme weather events.

The Navy describes NBVC and risks from flooding in the draft EA as follows:

> Per the Federal Emergency Management Agency floodplain delineation map for Ventura County (Federal Emergency Management Agency, 2021), approximately half of NBVC Point Mugu is located within a 100-year floodplain, (a 1 percent chance of flooding any given year). Portions of the installation located more inland have been delineated as a 500-year floodplain (a 0.2 percent chance of that area flooding each year) (Figure 1-3). A major contributing factor to an area's flood risk is its elevation above sea level. On average, areas of NBVC Point Mugu with a 1 percent annual flood risk are 5.2 feet above sea level, while those within a 500-year floodplain (0.2 percent annual likelihood) are 9.2 feet above sea level.
>
> Storms in Ventura County typically can last up to four days or more and consist of persistent rainfall of moderate intensities. However, an increase in the frequency and severity of extreme weather events, the variability of precipitation, and coastal inundation have been recorded in recent decades and are expected to amplify (California Climate Adaptation Strategy, 2025) and result in an increase in flood events (State of California, 2024; U.S. Army Corps of Engineers, 1998). NBVC experienced significant flooding events in 1998, 2005, and 2023; such increases in flooding events at the installation could jeopardize operations and potentially impact the NBVC Point Mugu mission.
>
> …
>
> Flood risk at NBVC Point Mugu usually arises from two separate but often concurrent sources: fluvial inundation from the Calleguas Creek watershed, and coastal inundation. Due to the base being situated in low-lying wetlands, flooding from these sources, along with increased shoreline erosion, puts the installation infrastructure and mission at risk during storm surge or heavy rainfall events.

The Navy is proposing to address the risks from flooding through implementation of three individual project components consisting of: replacing a tide gate and pump station adjacent to Calleguas Creek (Site 2), installing a new electricity line to power the

[8] California Senate Bill 1 which amended the Coastal Act to include Section 30270, was passed by the Legislature and approved by the Governor on September 23, 2021. However, the certified California Coastal Management Program (CCMP), which governs Commission review and approval of federal activities, development projects, permits and licenses, and support to state and local governments, has not yet been amended to incorporate Section 30270.

tide gate and pump station (Site 2A), and constructing a flood barrier consisting of a concrete wall adjacent to Las Posas Road (Site 3).

Sea Level Rise

The California Ocean Protection Council's State of California Sea-Level Rise Guidance 2024 Update[9], and the Commission's Sea Level Rise Policy Guidance 2024 Update[10], both contain a set of sea level rise scenarios for 14 tide gauges throughout California, and both agencies recommend using these scenarios and related information as best available science on sea level rise in California.

As described in the Commission's 2024 Sea Level Rise Guidance, the framework for guiding the selection of sea level rise projections over the life of a proposed development includes three potential scenarios: Intermediate, Intermediate-High, and High. The Intermediate scenario should be included for development with a low risk aversion (limited consequences or higher ability to adapt, such as public access amenities). The Intermediate-High Scenario is for development with a medium-high risk aversion (e.g. development that would experience greater consequences and/or have a lower ability to adapt, such as most residential and commercial structures). The High Scenario is included for development with extreme risk aversion and little to no adaptive capacity that would be irreversibly destroyed or significantly costly to repair, such as most critical infrastructure.

The Commission's Sea Level Rise Guidance identifies structures such as roads, airports, and government facilities as critical infrastructure. As such, the proposed improvements to NBVC to protect against flooding of these types of structures within the base are considered critical infrastructure. Pursuant to the Commission's Sea Level Rise Guidance a longer design life of 100 years or more should be considered for critical infrastructure. The table below provides scenarios for the Santa Monica Tide Gauge which is the closest to the proposed project.

Projected Sea Level Rise (in feet)			
Year	Intermediate	Intermediate-High	High
2100	2.9	4.6	6.4
2110	3.6	5.5	7.7
2120	4.2	6.2	8.8
2130	4.7	6.8	9.7

Future sea level rise is expected to exacerbate problems of coastal hazards and will threaten future operations of the development included in this CD. Over time, sea level rise will tend to (i) shrink the distance between breaking waves and the development, (ii) increase water depths and reduce wave attenuation in the nearshore (with the net

[9] Ocean Protection Council Sea-Level Rise Guidance: 2024 Update is accessible online at: https://opc.ca.gov/wp-content/uploads/2024/05/Item-4-Exhibit-A-Final-Draft-Sea-Level-Rise-Guidance-Update-2024-508.pdf

[10] The California Coastal Commission's Adopted Sea Level Rise Policy Guidance: 2024 Update is accessible online at: https://www.coastal.ca.gov/climate/slrguidance.html

effects of increasing the frequency and force of wave attack) and (iii) increase the severity and duration of flooding. Although the rate of future sea level rise is uncertain, the potential for large amounts of sea level rise in future decades must be factored into assessments of development risk and adaptation strategies.

NBVC SLR Analysis

In September 2020, a Coastal Adaptation Vision report for NBVC was prepared for the Navy to assess risks and guide the adaptation of existing facilities and infrastructure on the base to enhance long-term reliance of the base in response to sea level rise. The report aimed to do this by identifying protection for critical assets that need to remain in place and cannot be relocated or abandoned, while also looking for opportunities to relocate and consolidate other facilities and infrastructure to areas within NBVC that are less vulnerable. NBVC facilities that are no longer necessary would be removed and those areas would be restored to natural habitats.

The report incorporated and analyzed sea level rise scenarios and data from various resources including coastal resilience and economic analysis reports for greater Ventura County, as well as analyses more specific to NBVC. Based on that information, the report settled on an upper sea level rise projection of 5.5 feet through 2100. This projection is greater than the 4.6 feet of sea level rise by 2100 under the Intermediate-High scenario, and approximately one foot less than the 6.4 feet of sea level rise by 2100 under the High scenario, as identified in the Commission's 2024 Sea Level Rise Guidance.

The report analyzed the vulnerability of existing facility and infrastructure to SLR and hazards including: tidal inundation, coastal storm flooding storm surge, coastal storm flooding wave run-up, coastal erosion, and fluvial flooding (100-year occurrence interval). The zones for these hazards were overlaid to produce an aggregated exposure for facilities and infrastructure to identify the level of threat to compare against which assets were considered the most critical for NBVC operations and could require armoring or other hazard abating development, and whether an asset could be relocated or abandoned.

As described in the Coastal Adaptation Vision report for NBVC (and illustrated in **Exhibit 4)**, development within NBVC including Las Posas Road, the runway and other structures, were identified as critical infrastructure for which adaptation measures such as relocation away from hazardous areas, would not be feasible. Thus, the proposed project components at Sites 2 and 3 are necessary to provide better protection for this development against flood hazards. As discussed in more detail below.

Impacts from Shoreline Armoring

Coastal Act Section 30235 acknowledges that seawalls, revetments, cliff retaining walls, and other types of shoreline protective devices designed to forestall erosion and protect against flooding also alter natural landforms and natural shoreline processes. Accordingly, Section 30235 imposes a limited requirement to approve the construction of shoreline protective devices only when they are required to serve coastal-dependent

uses or to protect existing structures or public beaches in danger from erosion, and when they have been designed to minimize and mitigate for adverse impacts.

The Coastal Act provides this override provision because without it, shoreline structures would rarely be allowed, even when needed to protect structures that predated the Coastal Act or that are coastal-dependent. This is because they generally result in a variety of adverse impacts on coastal resources, including on sand supply, public access and recreation, coastal habitats (including wetlands), coastal views, natural landforms, and overall shoreline and beach dynamics on- and off-site, ultimately resulting in the loss of beach. The first way in which shoreline armoring can reduce available sand supply, public access, and/or coastal habitats is that it encroaches directly upon the shoreline area. In a beach setting, armoring directly occupies valuable beach space; similarly, in an estuarine setting, it occupies wetland, tidal channel or mudflat areas that provide habitat for coastal species. Second, fixing the backshore prohibits landward migration of the shoreline through natural erosion, sediment redistribution and sea level rise over time, which results in “coastal squeeze,” or the loss of beach and/or habitat area. This reduces the usable area of any beach for the public, and of any habitat area for coastal species. The third way in which armoring can affect sand supply and reduce public access is through a progressive loss of sand due to retention of sandy bluff material that would become beach sand if the bluffs were to continue to erode. In estuarine systems like those included within the proposed project, armoring structures can prevent both sand and fine sediments from entering the system, preventing natural sediment redistribution and natural geomorphic responses to tidal cycles, storm events, and sea level rise, and contributing to the erosion or loss of wetland and mudflat areas. Fourth, shoreline protective devices such as revetments and bulkheads can alter patterns of scour, resulting in end effects through the reflection or redirection of wave energy (and in estuaries, tidal currents) to adjacent unprotected sections of shoreline.

Analysis of Consistency with Sections 30235 and 30253

Coastal Act Section 30253 requires that new development minimize risk, assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area. However, Coastal Act Section 30235 requires the Commission to authorize shoreline protection devices – even if they would be inconsistent with other Chapter 3 policies – when they are necessary to protect an existing structure or public beach in danger of erosion (or when necessary to serve coastal-dependent uses). Thus, while Section 30253 generally prohibits development that requires the construction of protective devices that would substantially alter natural landforms, Section 30235 requires that such construction be permitted if certain criteria are met, even when it would alter natural shoreline processes.

Specifically, shoreline protective devices may be approved by Coastal Act Section 30235 if: (1) there is an existing structure; (2) the existing structure is in danger from erosion; (3) shoreline-altering construction is required to protect the existing threatened structure; and (4) the required protection is designed to eliminate or mitigate its adverse

impacts on shoreline sand supply.[11] Together, these criteria require findings that the proposed armoring is necessary, that it represents the least environmentally-damaging feasible alternative, and that adverse impacts have been eliminated or mitigated.

As noted above, large portions of NBVC Point Mugu, including numerous pre-Coastal Act structures that are considered existing under Section 30235, lie within the 100-year floodplain and are at risk of flooding during large coastal storm and/or runoff events. The Navy's draft EA concluded that the existing flood protection infrastructure on-site is inadequate to protect base facilities against even moderate, 10-year flooding events (10% annual chance of occurrence). These existing structures in danger from flooding include Las Posas Road, one of the base's primary access routes, and the airfield runway.

The Navy's hazard analysis determined that the portion of Las Posas Road adjacent to Calleguas Creek represents an existing critical asset that could not be relocated (**Exhibit 4**). As such, at Site 3 the proposed project would construct a 3,800-foot-long, five-foot-high concrete wall to protect Las Posas Road, 13th Street, and buildings and infrastructure elsewhere on the base from flooding during large storm events. As discussed above, alternatives to the proposed concrete wall, such as an earthen berm, would have larger on-the-ground footprints and result in larger areas of wetland fill. The project would also replace existing storm drain culverts along this segment of Las Posas Road with canal gates that would close during flood conditions but remain open during normal conditions to allow for tidal recharge of the adjacent wetlands.

The runway within NBVC was also determined to be a critical asset that cannot be relocated (**Exhibit 4**). The drainage system on NBVC includes several drainage ditches, culverts, and storm drains that convey agricultural and storm water runoff through NBVC and into Callegaus Creek. The primary drainage ditch on NBVC is ODD No. 2, which is approximately 9,250 feet long and 30 to 60 feet across and conveys drainage from approximately 18 square miles of agricultural land outside of NBVC to Callegaus Creek. Smaller drainage ditches within NBVC also feed into ODD No. 2. The tide gate at PM-143 was originally installed to control tidal saltwater intrusion that could flood the ditches. The velocity of water flow through the ditches and tide gates is generally slow, except during major storm events. During storm events, water can move through, around, or over tide gates such as PM-143. The proposed tide gate replacement at Site 2 would improve flood protection on NBVC, while the proposed pump replacement would reduce the flooding potential of the airfield by moving surface and flood waters within the base to Calleguas Creek more quickly. As discussed above in the wetland fill findings (Section IV.C), the proposed tide gate replacement is the least damaging feasible alternative, as the other alternatives considered would have required multiple tide gate and pumps station structures, with a larger overall footprint.

[11] Approval of a project also requires that projects be found consistent with the other policies of the Coastal Act in addition to these Section 30235 requirements.

NBVC is located within the larger Point Mugu wetland complex, including Mugu Lagoon, which consists of open water, intertidal salt marsh, mud, sand, tidal flats, drainage ditches and Calleguas Creek. The lagoon receives tidal flow from the Pacific Ocean, and fresh water from Callegaus Creek and the irrigation channels that flow through NBVC. Thus, the movement of water and sediments within and adjacent to Calleguas Creek and ODD No. 2 are tidally-influenced and connected to the coastal processes of the nearby beaches and Pacific Ocean. However, due to the location of the proposed development over three quarters of a mile inland from the beach, and given that the development is designed to help alleviate flooding risks during storm events while also transport runoff and flood waters within NBVC more efficiently to Calleguas Creek, the project is not anticipated to result in adverse impacts to shoreline sand supply. Project impacts to wetlands and other habitats in the Mugu Lagoon complex and proposed mitigation are addressed above in Section IV.C.

Based on these considerations, the proposed flood protection structures at Sites 2 and 3 are necessary to protect existing structures threatened by erosion and flooding, represent the least environmentally-damaging feasible alternatives at these sites, and have been sited and designed to avoid adverse impacts to local shoreline sand supply, consistent with Section 30235. Mitigation for impacts to wetlands is discussed in Section IV.C, above.[12]

The project meets the requirement of Section 30253(a) because it will help minimize risks to life and property in flood hazard areas. Section 30253(b) requires that new development neither create not contribute significantly to erosion, geologic instability or destruction of the site or the surrounding area. Since the concrete wall at Site 1 will be located outside of Calleguas Creek and the tidal prism it would not interact with the regular movement of water and thus would not contribute to any erosion. Rather the wall is intended to protect Las Posas Road, 13th Street and other base infrastructure during flooding events which would help prevent any erosion in that area. At Site 2, the proposed tide gate and pump station are intended to help NBVC better control water flows within the interior of the base which will help to minimize erosion. In addition, the pump station would include energy dissipators to slow the flow of water into Calleguas Creek, thus preventing erosion. Section 30253(b) also requires that new development not require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. Since the development at Sites 2 would be located adjacent to Calleguas Creek and the development at Site 3 would be located inland of Calleguas Creek and adjacent to Las Posas Road, the project would not be located along a bluff or cliff.

[12] Shoreline protection often has impacts to beaches and public access because it often takes up space on public land or beaches and can lead to the loss of sand supply that would otherwise nourish a beach. Here, the project is on federal property where there is no public access, and the development is located some distance from the open ocean shoreline. It will therefore not have public access impacts.

The Navy has previously stated, in relation to other projects at NBVC submitted to the Commission, that it understands the long-term threats to facilities and infrastructure within NBVC from sea level rise[13] and that it has been evaluating longer term strategies. Specifically, the Navy has previously stated that:

> …managed retreat has been in practice, where feasible, along the NBVC Point Mugu coastline since the late 1960s, when shoreline recession created a need for emergency protection of mission-critical infrastructure. For example, NBVC removed a large portion of the East Revetment, abandonment of the North Rifle Range and relocation of target area as well as some landward buildings. It has also taken significant steps to demolish facilities located along the coastline that are not critical or unique to operations, including but not limited to: Theodolite towers, radar towers, sailor support facilities (Club and Laundry facility), jet engine and prop test stands, laboratory buildings, antenna shop and yard, and campground sites near beach erosion. Managed retreat is also the purpose for the proposed relocation of PM-812. Second, an adaptation strategy is implemented by incorporating sea level rise estimates into the engineering plans for expanding the height and width of the revetments and for the siting and building height design of new proposed facilities. Finally, beach nourishment strategy is implemented with the dune replenishment at the east end of West Revetment extension and dune recontouring up-coast and down-coast of West Revetment.

The Navy has already implemented some managed retreat options on the base and will need to consider, if not accelerate, future planning efforts involving consideration of facility relocation and managed retreat. The coastal hazard report prepared for the Navy and discussed herein states that next steps and recommendations include the development of a NBVC adaptation plan, which is not yet complete. Although the SLR scenarios incorporated into the Navy's hazard analysis are not entirely consistent with the project SLR totals for critical infrastructure with a 100-year design life under the "High" scenario, the Navy's hazard analysis represents a significant early step towards base wide adaptation. The Commission finds that, in the near term, the proposed improvements at Sites 2 and 3 are required to provide increased flood protection for the existing critical assets at NBVC and are the least environmentally-damaging feasible alternatives at these sites. In addition, due to the location and design of the project, it is not anticipated to adversely impact shoreline sand supply or public access to the beach and shoreline.

Therefore, the Commission finds that the project is consistent with the hazard protection policies of the Coastal Act (Sections 30235 and 30253).

E. Water Quality

Section 30230 of the Coastal Act states:

[13] CD-0001-16

> Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

> The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30232 of the Coastal Act states:

> Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

Proposed project activities, including mobilization, staging and construction, have the potential to negatively impact wetlands, coastal water quality and the marine environment through sedimentation and turbidity, as well as accidental spill or release of crude oil, gas, petroleum products, or other hazardous substances.

Surface water hydrology at NBVC is described in the draft Environmental Assessment (EA) as follows:

> The primary surface water features at NBVC Point Mugu include Mugu Lagoon, drainage ditches, intertidal salt marsh, mud, sand, and tidal flats, and Calleguas Creek. Mugu Lagoon, although not part of the Study Area, is a key component of the hydrological system of the base; the lagoon receives tidal flow from the Pacific Ocean, as well as fresh water from Calleguas Creek and irrigation channels that flow into NBVC Point Mugu.
>
> Surface water flow at the installation is in response to intermittent seasonal precipitation. In addition, several of the drainage ditches, as well as Calleguas Creek, originate in irrigated and industrial lands upstream of NBVC Point Mugu; as such, storm and irrigation waters originating off-base also discharge into Mugu Lagoon.

> Calleguas Creek runs through the southeastern portion of NBVC Point Mugu. Along with its tributaries, Revolon Slough, Conejo Creek, Arroyo Conejo, Arroyo Santa Rosa, and Arroyo Simi, Calleguas Creek drains an area of approximately 340 square miles, including mountainous areas and level floodplains in the southern portion of the Oxnard Plain, into Mugu Lagoon. Historically, Calleguas Creek and its tributaries were seasonal intermittent streams. However, agricultural and urban development in the Calleguas Creek watershed have transformed the creek into a perennial stream, now fed primarily by treated wastewater, with secondary contributions from agricultural and urban runoff, rising groundwater, and intermittent storm flows (Ventura County Public Works Agency, 2024).
>
> …
>
> The drainage system on NBVC Point Mugu consists of several drainage ditches, culverts, and storm drains that were initially constructed to convey agricultural and storm runoff through the installation into Calleguas Creek. Storm drains are utilized to convey runoff from the housing areas into the drainage ditches, which are all entrenched. Culverts have been placed to convey flow under roads in wetland areas. The ditches are subject to tidal influence and drain nearby agricultural land and portions of the base to prevent high-tide flooding.
>
> The primary drainage ditch on the NBVC Point Mugu installation is ODD No. 2, which is an earthen trench approximately 30–60 feet across and six-nine feet deep that is comprised of silt and fine sand … Multiple smaller drainage ditches feed into ODD No. 2 throughout the installation. The overbank areas for these ditches are flat and connected by culverts; therefore, water ponds and these areas function as detention basins when runoff is greater than the capacity of the ditches (U.S. Army Corps of Engineers, 1998)…

The Navy included in its CD commitments for water quality protection during construction of the proposed project, including preparation of a Storm Water Pollution Prevention Plan (SWPPP), compliance with its National Pollutant Discharge Elimination System permit, and implementation of construction best management practices:

> The Navy would select, install, and maintain effective erosion- and sediment-control measures as identified and as necessary to comply with the permit. Under the Construction General Permit, the Navy would also develop a SWPPP for the proposed construction activities prior to implementing the Proposed Action. The SWPPP would describe and ensure implementation of practices that would reduce pollutants in stormwater discharges associated with construction activities in the Study Area and ensure compliance with the terms of the Construction General Permit. The plan would prevent sedimentation and the introduction of pollutants to Calleguas Creek, Mugu Lagoon, and the Pacific Ocean and would prevent violations of applicable regulations and standards.

> Additionally, the Navy would be required to obtain a Water Quality Permit (per Section 401 of the CWA) and a wetland permit (per Section 404 of the CWA) prior to constructing the flood improvement structures.
>
> …
>
> Upon completion of the Proposed Action, hydrologic conditions of the areas not developed with impervious surfaces would be restored to mimic predevelopment site hydrology, and revegetation would occur in the areas not developed with impermeable surfaces. Stormwater runoff improved as a result of implementation of the Proposed Action would be managed in accordance with the installation's SWPPP for industrial activities, as required by the NPDES General Permit Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities (Industrial General Permit) (NPDES Permit No. CAS000001).

Regarding hazardous materials, the CD states that:

> Construction equipment, consisting of vehicles, machinery, and associated fuels, hydraulic fluids, oils, and lubricants, would be stored at the project sites and the temporary construction laydown areas (Sites 7a and 7b); no other hazardous materials are anticipated to be stored in those locations. Construction contractors would follow resource management measures to protect against potential petroleum or hazardous material spills; if a spill were to occur, Navy standard operating procedures and resource management measures identified in the installation's SWPPP and Spill Prevention Control and Countermeasures Plan would be implemented to contain and minimize associated contamination. Additional measures to minimize the effects would be established during the Sections 401 and 404 permitting processes.

Finally, the project includes measures to protect marine species during construction. Any vegetation removal at sites known to host nesting birds would be conducted outside of the bird nesting season. At all other sites, the Navy would conduct surveys for sensitive bird species prior to conducting vegetation clearance and if sensitive bird species are identified within the project area vegetation clearance would be avoided or delayed. For work in the area of Calleguas Creek, two biological monitors would be present and work would halt or not occur if harbor seals (*Phoca vitulina*) or green sea turtles (*Chelonia mydas*) are identified within Calleguas Creek.

With implementation of the above-referenced water quality protection measures, the Commission finds that the proposed project would not cause significant adverse water quality impacts at and adjacent to the project area. Therefore, the Commission finds that the project is consistent with the water quality, spill prevention, and marine resource protection policies of the Coastal Act (Sections 30230, 30231 and 30232).

F. Cultural Resources

Section 30244 of the Coastal Act states:

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

As described in the INRMP for NBVC, Point Mugu and the surrounding areas were previously occupied by the Chumash Indians before European contact in the area in 1542. Europeans named the area “Mugu” after the Chumash word “muwu” for “beach.” The Chumash village at Mugu was a major cultural center until the late 1700s, when most of the Chumash people were removed and relocated to Mission San Buenaventura, located within what is now the City of Ventura. The area was then primarily used for agricultural practices until it was acquired by the United States government after the end of the Mexican-American War. It was developed with rail infrastructure, other agricultural uses, and finally developed by the Navy starting in 1943. Cultural and archaeological resources in the project area may include sacred lands, traditional cultural places and resources, and archaeological sites.

Cultural resources are discussed in the draft EA as follows:

> The Navy has determined that there are no known archaeological resources within or adjacent to the project area. The project area does not overlap, and is not adjacent to, any built environment resources that are eligible for listing on the National Register of Historic Places. The Proposed Action would not affect any historic properties listed on or eligible for the National Register of Historic Places, or cultural resources that are considered contributing properties to a listed or eligible historic district. Consistent with 36 CFR Part 800.5(d)(1), the Proposed Action has been determined to be consistent with a finding of “no historic properties affected.”
>
> The proposed undertaking and associated National Historic Preservation Act Section 106 coordination with Native American tribes and the California State Historic Preservation Officer is covered under the existing 2015 PA [Programmatic Agreement], as amended in 2025, between the Commanding Officer, Naval Base Ventura County; and the California State Historic Preservation Officer Regarding Navy Undertakings within Ventura County, California. However, archaeological and tribal monitoring will be required for initial ground disturbing activity associated with the proposed undertaking in areas of provisional archaeological sensitivity, per direction from the NBVC Cultural Resources Manager and in accordance with the 2015 PA.

Commission staff conducted outreach to Tribes with potential cultural affiliation to the project site, as identified by the Native American Heritage Commission. These Tribes included the Barbareño/Ventureño Band of Mission Indians, the Coastal Band of the Chumash Nation, the Northern Chumash Tribal Council, and the Santa Ynez Band of

Chumash Indians. Commission staff sent emails and letters to the Tribes on May 11, 2026.

A member of the Barbareño/Ventureño Band of Mission Indians responded via email on May 11, 2026, stating that the Tribe wished to have monitors present for any and all soil disturbance and surveying activities. Commission staff responded to the email stating that it had received the Tribe's response and asked for a clarification as to whether the Tribe was also interested in holding a formal consultation. As of the date of this staff report the Tribe has not responded.

Commission staff notified the Navy that staff had conducted outreach to Tribes and had received a response from the Barbareño/Ventureño Band of Mission Indians (Tribe) asking to be involved in monitoring soil disturbance and surveying for the project. Commission staff asked the Navy if it would be able to consult with the Tribe and if it would be able to grant the Tribe's request to be involved in the project. The Navy responded that it does not consult with non-federally recognized tribes and that it would not be able to grant the Tribe's request to be involved. On June 9, 2026, Commission staff shared the Navy's response with the Tribe. Commission staff notified the Tribe that the 15-day public comment period for the project EA has closed pursuant to the National Environmental Policy Act, but that the Coastal Commission will be holding a public meeting for the project on July 8-10, 2026, in Ventura. Commission staff let the Tribe know that it could participate in the Commission meeting should it choose to do so. Commission staff also offered to hold a formal consultation with the Tribe. Commission staff followed up with a phone call to the Tribe and left a voicemail. As of the date of this staff report, Commission staff have not received a response from the Tribe.

Commission staff also reached out to the Tribes listed above via phone on May 29, 2026, as a follow up to the letters and emails sent on May 11, 2026. Commission staff spoke with the Chair of the Coastal Band of the Chumash Nation and the Chair requested that Commission staff resend the consultation letter. Commission staff resent the letter and as of the date of this staff report, Commission staff have not received any other correspondence from the Coastal Band of the Chumash Nation. Commission staff also spoke with the Chair of the Northern Chumash Tribal Council to briefly discuss the project and the Chair expressed that she did not feel an official consultation was necessary at this time. For those Tribes that Commission staff were unable to connect with via phone, Commission staff left a voicemail and no response has been received.

As described above, the Navy has determined that there are no known archaeological resources within or adjacent to the project area. The Navy's 2015 Programmatic Agreement (PA), as amended in 2025, between the Commanding Officer, Naval Base Ventura County and the California State Historic Preservation Officer includes processes and procedures for monitoring cultural resources monitoring during initial ground disturbing activities. The PA also includes procedures for handling human remains in the event that there is an inadvertent discovery of remains during project activities.

Therefore, with the incorporation of the measures described above, the Commission finds the project consistent with Section 30244 of the Coastal Act.

V. SUBSTANTIVE FILE DOCUMENTS

1. Navy Consistency Determination CD-0002-26, April 13, 2026.

2. Draft Environmental Assessment for Naval Base Ventura County Flood Protection, Navy, March 2026.

3. CD-49-95 (Navy, Construction of Battalion Center Rifle Range, NBVC)

4. CD-21-97 (Navy, Laguna Road Causeway, NBVC)

5. CC-058-01 (City of Santa Barbara, Santa Barbara Municipal Airport)

6. CD-0001-16 (Navy, Repair and enhance existing shoreline protection structures, repair Beach Road, and restore dunes, NBVC)

7. CD-084-04 (Bureau of Land Management, Humbolt Bay South Split)