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STAFF RECOMMENDATION

ON CONSISTENCY DETERMINATION

Consistency Determination No.	**CD-025-02**
Staff:	KS-SF
File Date:	3/26/2002
45th Day:	5/10/2002
60th Day:	5/25/2002
Commission Meeting:	5/10/2002

FEDERAL AGENCY: **National Park Service**

PROJECT LOCATION: The Santa Monica Mountains National Recreation Area (Exhibits 1-3)

PROJECT DESCRIPTION: Draft General Management Plan for the Santa Monica Mountains National Recreation Area (SMMNRA)

SUBSTANTIVE FILE DOCUMENTS: See page 12.

EXECUTIVE SUMMARY

The National Park Service has submitted a consistency determination for a Draft General Management Plan for the Santa Monica Mountains National Recreation Area. The purpose of the management plan is to provide guidance in managing the 150,000 acres of the Santa Monica Mountain region, and some 69,099 acres of protected parkland. The Santa Monica Mountains Comprehensive Planning Act (enacted in 1978) mandated that a comprehensive plan be created for the preservation and management of the recreation area. Through a collaborative effort of the National Park Service, California State Parks, and the Santa Monica Mountains Conservancy, the first management plan was released in 1982.

The National Parks and Recreation Act further stipulated that the plan should be updated every 15 to 20 years. While the GMP represents the ultimate vision of the these three agencies, that they would accomplish over time. The enabling legislation for the SMMNRA envisioned a cooperative effort among state, local governments, and the Park Service, to preserve the significant scenic, recreational, educational, scientific, natural and cultural benefits of the Santa Monica Mountains and the adjacent coastline.

The Plan is not a specific plan, but a framework for management and implementation. The Park Service could undertake some actions over a period of ten years following the finalization of the EIS. Although the California State Parks intends to use the GMP, it would act as an advisory document and would not replace current or future state park individual and general plans, which will continue to be the primary long-range planning documents for individual State park units in the Santa Monica Mountains.

The proposed Draft General Management Plan is consistent with the Coastal Act mandate to protect environmentally sensitive habitat areas, marine resources, wetlands, and other coastal waters. The proposal is consistent with the public access and recreation policies of the Coastal Act (Sections 30210-30214), because the Park Service will manage the habitat areas in a manner balancing public access and recreation needs with the need to protect sensitive wildlife resources. Finally, the Plan would support other Coastal Act goals, including protecting scenic public views, cultural resources, and water quality. Therefore, the proposal is consistent with Sections 30210-30214, 30230, 30231, 30240, 30244, and 30251 of the Coastal Act.

STAFF SUMMARY AND RECOMMENDATION

I. Project Description. The National Park Service submitted a consistency determination for the Draft General Management Plan (GMP) for the SMMNRA. The Santa Monica Mountain region in southern California includes some 150,050 acres, 69,099 acres are protected parkland (Exhibits 1-3). Ninety percent of the area within the SMMNRA is not developed. The recreation area extends from the Hollywood Bowl on the east, 46 miles west to Point Mugu, and averages seven miles in width. To the north, the recreation area is bordered by Simi Valley, the San Fernando Valley.

The Pacific Coast Highway crosses the recreation area to the south and includes Topanga, Malibu and Pacific Palisades. In the east the area begins just north of Hollywood with small undeveloped canyons. To the west, in Topanga State Park, the mountains reach a width of 8 miles, most of which is within the city limits of Los Angeles. Further to the west, the area is less developed, ending at Point Mugu State Park, the area's only designated wilderness. The Santa Monica Mountain Zone (SMMZ), comprising an additional 75,000 acres, was established through 1978 legislation, and extends beyond the boundaries of the national recreation area to include the entire Santa Monica Mountain Range.

The purpose of the GMP is to update the previous management plan, which was released in 1982. Fifteen years of additional population growth, a greater knowledge of the area's resources, and

evolving land use patterns have created a need for a new management plan to protect the resources of the SMMNRA, while addressing new obstacles and opportunities. The plan seeks to define why a park was established, and what resource conditions and visitor experiences should be achieved and maintained over time to conserve that original purpose. The plan considers various approaches to park use, management and development.

Congress established the Santa Monica Mountains National Recreation Area in 1978 as a cooperative effort to preserve the scenic, natural, and historic, as well as public health values of the Santa Monica Mountains. The area is nationally significant in that it is one of the greatest mainland Mediterranean ecosystems in the National Park System. The area is home to 26 distinct natural communities, including freshwater aquatic habitats, and two of the last salt marshes on the Pacific Coast. Within the SMMNRA exists habitat for more than 450 animal species, and more than 50 threatened or endangered plants and animals, representing one of the highest concentrations of such rare species in the United States.

Land Ownership Within the
Santa Monica Mountains National Recreation Area Boundary[1]

Ownership/Geographic Area	Total Acreage	% of SMMNRA
Private Land	76,017	54
State of California Parkland	33,271	22
National Park Service	21,832	14
Los Angeles County Land (non-parkland)	3,258	3
Mountain Resources Conservation Authority/ Santa Mountains Conservancy	7,392	4
City of Los Angeles Land (non-parkland)	2,009	2
Miscellaneous Public Land	1,463	.83
COSCA Open Space	96	.66
Federal Lands (non-parkland)	936	.63
Mountain Restoration Trust	1,292	.61
Los Angeles County Parkland	968	.56
City of Los Angeles Parkland	447	.31
Other State Lands (non-parkland)	328	.21

More than 1000 archeological sites exist within the park's boundaries reflecting human habitation in the mountains dating back to 10,000 years. Seventy-three sites of significance are potentially eligible for listing on the National Register of Historic Places. Native American Indians have a long and deeply spiritual history of interaction with the Santa Monica Mountains, and they value many parts of the park especially as places to seek spiritual renewal, conduct traditional ceremonies, and to gather plants for traditional purposes.

[1] Draft General Management Plan/EIS, Santa Monica Mountains National Recreation Area, U.S. Department of the Interior – National Park Service (2002)

National Park Service
The National Park Service oversees the SMMNRA, and has direct responsibility for about 15 percent of the land within the boundary. The NPS is a partner, sharing stewardship with the public, other agencies and private landowners. NPS units of the SMMNRA include: the Zumas-Trancas Canyon, Paramount Ranch, Rancho Sierra Vista/Satwiwa, Arroyo Sequit, Circle X Ranch, Rocky Oaks, Castro Crest, Cheeseboro Canyon and Simi Hills, Solstice Canyon and the Peter Strauss Ranch.

California State Parks
The California Department of Parks and Recreation manages 33,271 acres within the recreation area including: Point Mugu State Park, Leo Carrillo State Beach, Point Dume State Beach, Malibu Creek State Park, Malibu Lagoon State Beach, Topanga State Park and Will Rogers State Historical Park.

Santa Monica Mountains Conservancy (SMMC)
Created in 1979, the primary responsibility of the SMMC is to acquire land and turn it over to the appropriate land management agencies. The SMMC is not a park management agency, although it has acquired some 5,200 acres of key park and recreation parcels in the mountains. The Mountains Recreation and Conservation Authority (MRCA) is the land management agency of the SMMC, created under a Joint Powers Agreement in cooperation with several local park agencies. The MRCA operates the following SMMC lands within the recreation area: Coldwater Canyon, Corral Canyon, Cross-Mountain Parks, Franklin Canyon Ranch, Fryman Canyon, Mission Canyon, Red Rock Canyon, San Vicente Mountain Park and Temescal Canyon Gateway Park.

Management Alternatives
The National Park Service, California State Parks and the Santa Monica Mountains Conservancy have developed several management alternatives in the Draft GMP. All of the alternatives consider five separate and distinct management areas (low-moderate-high intensity development and use, and scenic corridor and community landscape) as well as resource management, visitor experience and development and public agency management activities.

Preferred Alternative
Although individual alternatives were evaluated in the GMP, the NPS states that some actions would occur regardless of the selected preferred alternative. The concept of the *Preferred Alternative* incorporates a designated low intensity use for some 80% of the parkland, with moderate intensity areas acting as buffers around urban areas and scenic corridors. Smaller pockets of high intensity activities would be located in non-sensitive or previously developed areas.

Low Intensity

Under the preferred alternative approximately 80% of the park would be designated low intensity, and facilities would be maintained in a relatively primitive manner. Watersheds and coastal resources would be protected and preserved through coordinated watershed management, and lagoons, coastal wetlands and marine interface areas would receive protection and management. Steelhead trout re-introduction would be initiated in Solstice Canyon, and habitat enhancement would take place in Malibu Creek and Arroyo Sequit watersheds.

Moderate Intensity

The preferred alternative states that 15% of the area within the park boundary would be designated as moderate intensity. This portion of the alternative includes boundary adjustment studies for Las Virgenes Reservoir, Ladyface, Marvin Braude Mulholland Gateway Park, and Stone Canyon to protect critical open space and preserve wildlife corridors. A nomination package would also be submitted to the National Register of Historic Places to designate and archeiological district with the park.

High Intensity

The remaining 5% of the area within the park boundary would be developed under the high intensity option and would include the following facilities and actions:

(1) The Mugu Lagoon Visitor Education Center will be located at the western most end of the park off the Pacific Coast Highway. A proposed education center would be constructed in an already disturbed area, and a boardwalk around the lagoon would expand visitor access to the lagoon.

(2) Circle X Ranch would become a primitive overnight camp with expanded facilities for group camping. The upper levels of the camp would be redesigned and developed, and the facilities would offer improved access to backcountry recreation trails.

(3) Leo Carrillo State Beach Campground would be rehabilitated to integrate the campground with the natural riparian process. Interpretive information describing the riparian setting would be included as part of a public education program at the campground.

(4) Paramount Ranch would include facilities for a film history and education center, and museum.

(5) White Oak Farm at the intersection of Mulholland Highway and Las Virgenes Canyon Road would offer interpretive and educational programs.

(6) The barn at Rancho Sierra vista would be adaptively reused for environmental education.

(7) A Scenic Coastal Boat Tour would offer visitors options to view the coastline and mountain scenery looking landward. Access would be located at the Santa Monica and Malibu Pier.

(8) A Visitor Education Center is planned for Malibu Bluffs, which would serve as a staging area and orientation for park facilities such as Adamson House, Malibu Lagoon and Malibu Pier.

(9) A jointly operated Administration, Environmental and Education Center located at the Gillette Ranch site would house the NPS and State Parks operations, curatorial and management functions. Existing buildings would be adapted for classroom use.

(10) The Marion Davies Home near the Santa Monica Pier would function as a visitor orientation and eastern gateway to the SMMNRA, where interpretive exhibits depicting the evolution of the southern California coastal culture, and the history of the Pacific Coast Highway and Historic Route 66 would be displayed.

(11) A Visitor information Site at Los Angeles International Airport would provide information on the Santa Monica Mountains NRA and serve as a retail outlet for park merchandise.

While the purpose of the General Management Plan is to provide guidance in the management of the SMMNRA, the planning process considers the overall goals and vision of the park in relation to its national, historic and communal settings.

The mission of the Santa Monica Mountains National Recreation Area is to protect and enhance, on a sustainable basis, one of the world's last remaining examples of a Mediterranean ecosystem and to maintain the area's unique natural, cultural and scenic resources, unimpaired for future generations. The SMMNRA is to provide an inter-linking system of parklands and open spaces that offer compatible recreation and education opportunities that are accessible to a diverse public. This is accomplished by an innovative federal, state, local, and private partnership that enhances the region's quality of life and provides a model for other parks challenged by urbanization.

A further discussion of the Park Service's interim goals and summary of alternatives can be found in the General Management Plan's summary of alternatives, which more fully describes the environmental consequences and proposed mitigation measures for five alternatives considered in the EIS.

The interim goals of the SMMNRA General Management Plan include:

Resource Protection and Habitat Enhancement
To protect and enhance species, habitat diversity and natural processes within the SMMNRA; restore native plant species and plant communities such as coastal sage scrub, coastal live oak woodland, and valley oak savannas; enact programs to remove and control the encroachment of exotic flora and fauna into natural ecosystems; maintain and improve water quality through the management of riparian communities, estuaries and coastal waters; minimize development of open space and cultural landscapes within the recreation area and to promote and perpetuate biological diversity through development density strategies.

Land Use and Ownership
Apply sustainable designs to minimize impacts; use resource conservation, recycling, energy efficient and ecologically responsible materials and techniques for construction; and discourage the use of public funds for reconstructing facilities destroyed by natural processes in zones of high hazard such as floods, fires, earthquakes and geologic hazards.

Visitor Experience
Manage trails and scenic corridors to provide non-motorized access to diverse points of opportunity for recreation, interpretation, and appreciation involving natural and cultural resources; enhance the visitor experience to provide a safe and conflict free environment among competing recreational uses; and make facilities, programs and services of the recreation area reasonably accessible to all people, including those with disabilities.

Education and Interpretation
Provide an educational outreach program developed in partnership with the local educational system; place interpretive information at appropriate locations through out the recreation area describing the area's cultural and natural features, visitor facilities, activities and services; and provide an educational outreach program describing the functions, opportunities and values of the SMMNRA ecosystem.

Access and Transportation
Promote the development of efficient transportation systems to the SMMNRA from locations through out southern California and within the park; limit expansion of existing roadways within the SMMNRA; protect park resources by reducing the number of vehicles on roads within the NRA; and De-emphasize the use of private vehicles by providing alternate transportation modes; explore the feasibility of a shuttle system within the park.

Scenic Corridors
Support lower speed limits and the development of additional scenic pullouts an routes designated as scenic corridors; evaluate the options of a greenway trail system that connects vehicle pullouts, and promotes pedestrian and bicycle use; and support the removal of street lighting and overhead power lines where feasible.

II. <u>Procedures</u>. As currently submitted the General Management Plan includes proposals at varying levels of specificity. This consistency determination evaluates all these in as much detail as is presently available. Future site-specific implementation planning on SMMNRA lands within coastal zone boundaries or affecting the coastal zone will be accompanied as needed by consistency or negative determinations that provide additional details for each proposal.

Such a procedure is encouraged by the Coastal Zone Management Act (CZMA), which requires "phased federal consistency review" in cases where federal decisions to implement an activity are also made in phases. Section 930.36 (d) of the CZMA implementing regulations provides:

> *(d) Phased consistency determinations. … In cases where federal decisions related to a proposed development project or other activity will be made in phases based upon developing information that was not available at the time of the original consistency determination, with each subsequent phase subject to Federal agency discretion to implement alternative decisions based upon such information (e.g., planning, siting, and design decisions), a consistency determination will be required for each major decision. [15 CFR Section 930.36(d)]*

Thus, the National Park Service's consistency determination is for a document generally describing the overall management goals for the recreation area. Because many of the activities identified in the management plan are still at the conceptual stage, additional Commission consistency review may be required after completion of final management plans, and/or area- or project-specific plans.

Historically, when the Commission has reviewed these types of conceptual or management plans, the Commission's usual practice has been to review the plan at a general level, noting potential problem areas and projects or activities which would be likely to affect the coastal zone if implemented. The benefits of this type of phased review are that: (1) it provides the Park Service, in advance of specific project or plan implementation, notice of what issues are likely to arise under the CCMP; and (2) it provides the Commission with an overall planning context within which to review specific plans or projects subsequently proposed. The Commission can also ease its administrative burden by identifying at the more general planning stage those projects or activities that do not affect the coastal zone, or where effects are sufficiently minor to allow authorization through the negative determination procedure.

At this time, the Commission is not aware of future acquisitions, proposals, or activities that would definitely trigger the need for further consistency determinations. Rather, in this instance, the Commission is requesting that the Park Service continue to coordinate the implementation of its management plan with the Commission, to enable further Commission review of specific plans and activities. To ease in the administrative burdens, the proposals/specific plans may be consolidated into a single (or groups of) consistency determination(s). Also, some of these proposals/specific plans may pose only minor issues may be reviewed administratively through the negative determination process. The Park Service should continue to consult with the Commission staff on the most appropriate form for review.

III. <u>Status of Local Coastal Program</u>. The standard of review for federal consistency determinations is the policies of Chapter 3 of the Coastal Act, and not the Local Coastal Program (LCP) of the affected area. If the LCP has been certified by the Commission and incorporated into the CCMP, it can provide guidance in applying Chapter 3 policies in light of local circumstances. If the LCP has not been incorporated into the CCMP, it cannot be used to guide the Commission's decision, but it can be used as background information.

The SMMNRA falls under the jurisdiction of three LCPs. The Ventura County LCP has been certified by the Commission, but it has not been incorporated into the CCMP. In 1987, the Commission certified the

1986 Land Use Plan (LUP) component for Los Angeles County. The LUP covered the portions of the Santa Monica Mountains within Los Angeles County. The LCP for Los Angeles County was never completed. Los Angeles County is preparing a new LCP for the remaining unincorporated area of the Santa Monica Mountains. The Coastal Commission is in the process of drafting the LCP for the City of Malibu. Neither of these LCPs have been certified.

IV. Federal Agency's Consistency Determination. The National Park Service has determined the project consistent to the maximum extent practicable with the California Coastal Management Program.

V. Staff Recommendation. The staff recommends that the Commission adopt the following motion:

MOTION: **I move that the Commission concur with consistency determination CD-025-02 that the project described therein is fully consistent, and thus is consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program (CCMP).**

STAFF RECOMMENDATION:

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

RESOLUTION TO CONCUR WITH CONSISTENCY DETERMINATION:

*The Commission hereby **agrees** with the consistency determination by the National Park Service, on the grounds that the project described therein is fully consistent, and thus is consistent to the maximum extent practicable, with the enforceable policies of the CCMP.*

VI. Findings and Declarations:

The Commission finds and declares as follows:

1. Environmentally Sensitive Habitat and Coastal Waters. The Coastal Act provides:

30240 (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.

30230: 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.

30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The goals of the SMMNRA General Management Plan are consistent with the provisions of Sections 30240(a), 30230, 30231 and 30233 of the Coastal Act. The Park Service states that:

The preferred alternative includes the provision of proposed boundary changes and future studies to create additional resource protection along the north-central borders of the park, and to determine recommended boundary adjustments north of Cheeseboro and Palo Comado Canyons.

Undisturbed vegetation and wetlands would be avoided, and new development would be sited in previously disturbed areas to minimize potential impacts. New developments would be excluded from existing wildlife corridors, and degraded habitats within conserved linkage areas would be restored. The feasibility of retrofitting wildlife underpasses, where primary roads intersect with wildlife movement areas within the park will be considered in the NEPA/CEQA environmental documents that will address habit linkages within their sphere of influence.

Under the preferred alternative approximately 80% of the park would be designated low intensity, and facilities would be maintained in a relatively primitive manner. Watersheds and coastal resources would be protected and preserved through coordinated watershed management, and lagoons, coastal wetlands and marine interface areas would receive protection and management. Steelhead trout re-introduction would be initiated in Solstice Canyon, and habitat enhancement would take place in Malibu Creek and Arroyo Sequit watersheds.

Erosion control measures such as sediment retention basins, silt fencing, and slope stabilization techniques would be implemented. A construction storm water management plan would be prepared for all activities affecting one or more acres to minimize soil disturbance. Additionally, a qualified geologist would conduct geo-technical and geologic hazard investigations prior to construction.

Impacts
The Park Service states that planned facility development would have a negligible to minor impact on some wildlife species, and there is minimal potential for decreases in the habitat available for endangered, threatened, rare or sensitive species of wildlife under the preferred alternative. In the same analysis of potential impacts, the Service states that visitor uses, such as hiking, horseback riding, and mountain biking would have direct and indirect, adverse effects on all classes of wildlife and wetlands, and that the impacts and mitigation measures identified for biological and wetland resources in the Draft General Management Plan are of a generalized nature. Specific impacts and mitigation measures would be identified in NEPA and federal consistency documents for particular projects within the SMMNRA when those projects are brought forward for consideration.

Wetlands
In order to make a determination of the impacts the proposed project has on Coastal Act wetlands, a delineation depicting wetlands, environmentally sensitive habitat areas, riparian corridors, wetland vegetation, and associated buffer zones will be required. The delineation should indicate the affected area, the square footage of the wetland and relevant buffer zones, type of vegetation, and the nature of the impact. It appears that the analysis in the Draft EIS/EIR was done in accordance with the U.S. Army Corps of Engineers definition of wetlands under Section 404 of the Clean Water Act. However, wetlands defined under the Coastal Act differ from those of the Corps, and may include larger and more diverse areas.

Buffer Zones
The Commission, unlike the U.S. Army Corps of Engineers, usually requests an analysis of buffer zones for undeveloped lands surrounding wetlands. Buffer zones act to minimize the disturbance to the wetland, control the effects of erosion, sedimentation and pollution, and provide habitat for species residing in the transitional zone between wetlands and uplands. These buffer zones typically have a minimum width of 100 feet, and where development poses increased hazards to a wetland or a wetland species larger buffer zones may be required.

Based on the above considerations and discussion, the Commission finds that under the General Management Plan the Park Service may propose actions that could potentially affect Coastal Act wetlands and sensitive habitat areas that are not fully evaluated in this preliminary environmental document. In consideration of the general nature of the assessment of impacts and proposed mitigation, further review of individual projects included in the management plan will be required. The Commission will be afforded the opportunity for further consistency review for specific implementation proposals. The Commission concludes that the proposed Draft General Management Plan is consistent with Sections 30230, 30231, and 30240 of the Coastal Act.

2. <u>Public Access and Recreation.</u> Sections 30210-30212 of the Coastal Act provide for the maximization of public access and recreation opportunities, acknowledging that such access needs to be managed in a manner taking into account natural resource protection needs. Section 30212.5 provides that where appropriate and feasible, public facilities, including parking areas or facilities, "shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area." Section 30213 provides for the protection of lower cost visitor and recreational facilities. Section 30214 provides that:

> *(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.*

Access to the coastal zone within the Santa Monica Mountains National Recreation Area is provided through a network of recreational trails, and vertical and lateral access to public beaches and the coastline. The proposed Mugu Lagoon Visitor Center would be located on federal military land adjacent to the Pacific Coast Highway. Public access to the shoreline would be extended to the maximum extent possible given the security constraints of military activities, and all of the facility development projects in the GMP adjacent to the shoreline will provide public access, with consideration given to resource protection.

Existing parking areas at trailheads and visitor facilities are dispersed throughout the recreation area, and tend to be small to moderate in size. Compounding this problem is the lack of transportation alternatives available to visitors, and the inability of the recreation area to accommodate large transit vehicles. The major routes through and near the

SMMNRA are currently operating at or near capacity, and the majority of visitors to the area use private vehicles. The preferred alternative would include public transit options such as a shuttle service, which would pick up visitors at designated lots and take them to various park destinations.

In conclusion, the Commission agrees with the Park Service that the proposed management plan protects and supports coastal public access and recreation, in a manner balancing conflicts between competing recreational uses and protecting environmentally sensitive habitat and other coastal resources. In this way, the Park Service will implement the management measures proscribed in Section 30214 of the Coastal Act. Finally, the Park Service will continue to coordinate the implementation of these management measures to enable the Commission to further review specific proposals. The Commission concludes that the proposed plan is consistent with the public access and recreation policies (Sections 30210-30214 and 30220-30222) of the Coastal Act.

VII. SUBSTANTIVE FILE DOCUMENTS:

1. Draft General Management Plan/EIS, Santa Monica Mountains National Recreation Area, U.S. Department of the Interior-National Park Service (2002)