

Coastal Consistency Determination
General Management Plan
Cabrillo National Monument
San Diego, California

1. AUTHORITY

This Coastal Consistency Determination is submitted in compliance with 15 CFR Section 930.34 *et seq* of the National Oceanic and Atmospheric Administration (NOAA) Federal Consistency Regulations (15 CFR 930).

2. DETERMINATION

Cabrillo National Monument is located on the southern tip of Point Loma in San Diego, California. (See page 2 of *Draft General Management Plan and Environmental Impact Statement* (DGMP/EIS) for a location map.) The National Park Service (NPS) owns 137.06 acres in fee simple and the Department of Interior owns 6.88 acres. The NPS administers approximately 16 acres on the west slopes of Point Loma through an agreement with the U.S. Navy and an approximately 120 acre intertidal area through an agreement with the Army Corps of Engineers. (See pages 3 and 133 of DGMP/EIS.) Even though these lands are excluded by definition from the coastal zone, activities on them must be reviewed for consistency with the California Coastal Management Program (CCMP).

The NPS has evaluated the DGMP and has found it consistent to the maximum extent practicable with the California Coastal Act of 1976 as amended. The environmental impact statement included with the management plan provides the basis for the finding.

3. PROJECT DESCRIPTION

The consistency determination evaluates only Alternative B, the Proposal, since it is the alternative which the NPS proposes to implement. Briefly, the Proposal would add staff and facilities to more adequately protect and interpret the monument's significant resources. Resource management programs would be increased to protect the tidepool ecosystem while allowing public access, to enhance the coastal sage scrub habitat, and to open safe military defense structures to public use and enjoyment. The Proposal would result in a broader range of visitor choices and experiences within the monument than is available now. A new location for the entrance station would provide better orientation to the monument, allow entrance fees to be collected from those who use the tidepools, and include the tidepools and western part of the monument in the visitors' perception of the monument. An interpretive building would be constructed at the lighthouse. The Navy Marine Science facility near the tidepools would be converted to an intertidal

interpretive center, if the Navy declares the facility excess to its needs and it is transferred to the monument. Outdoor educational facility seating would be improved at the Ballast View rest area. The Whale Overlook would be replaced to accommodate more visitors and improve its aesthetic quality. The Bayside Trail would be extended to form a loop trail . Administrative and storage space would be added to increase staff efficiency and

effectiveness and to better care for museum artifacts and resources. (A tabular summary of the proposal appears on pages v-xi and the proposal is discussed and illustrated on pages 24-49 of the DGMP/EIS.)

4. CONSISTENCY WITH PROVISIONS OF THE CALIFORNIA COASTAL ACT

ARTICLE 2, PUBLIC ACCESS

Access to the coastal zone within Cabrillo National Monument is provided via Cabrillo and Gatchell Roads. A parking lot and two scenic overlooks offer a total of 77 parking spaces. Currently, the public can visit the shoreline and tidepools without passing the entrance station. Since the tidepools are among the best-preserved in the southern California area, they are a popular attraction. However, they are a fragile resource, impacted by excessive visitor use (pp. 84-85). The Proposal intends to manage public access to protect resources. As part of that intent, the Proposal includes the relocation of the entrance station so that those visiting the tidepools will pass through the entrance station and become aware that the tidepools are a part of the monument. This step would include tidepool visitors in the fee collection process.

Our analysis suggests that fee collection will not unduly restrict public access. The park entry fee of \$4 per vehicle includes a seven-day pass. An annual pass costs \$10. In nearby shoreline areas, parking meters cost \$1 per hour with a two hour limit. State and local public facilities also charge entry or parking fees. The fee to enter Cabrillo National Monument is an entrance fee to all areas within the monument which covers an equivalent of four hours at a parking fee site and can be used at no additional cost for seven days.

The Proposal suggests other methods of managing visitor use to protect the tidepools (p. 26). Any new strategy to limit peak visitor use would be tested against the results of the 5-year baseline study to determine if the approach increased protection of the tidepool ecosystem.

The Proposal also includes development of an intertidal interpretive center in facilities currently owned and used by the U.S. Navy (p.26). One intent of developing the interpretive center would be to more effectively introduce visitors to the fragile nature of the intertidal area before they enter the tidepool area. Should these facilities become excess to the Navy and the NPS were able to implement this plan, a consistency determination would be prepared for that specific development.

In sum, the GMP is consistent with public access provisions of the California Coastal Resources Planning and Management Policies by proposing to manage public access related to 'the capacity of the site to sustain use" and 'the fragility of the natural resources" (Section 30214).

ARTICLE 3, RECREATION

In fulfillment of the NPS mission, the NPS protects the coastal zone within Cabrillo NM for public enjoyment and education. The GMP is consistent with the recreation provisions of the California Coastal Resources Planning and Management Policies. (Recreation resources of the monument are described on page 7.) Cabrillo NM attracts an average of 1.5 million visitors per year (page 89) and is considered one of San Diego's prime visitor attractions.

ARTICLE 4, MARINE ENVIRONMENT

The NPS proposes to "manage visitor use patterns and activities to protect, preserve, and restore the tidepools as possible to a healthy, functioning ecosystem, allowing Visitors to experience and learn without harming the resource." (p. 17) The strategies to implement this objective are described on page 26, the tidepool environment is described on page 84, and the environmental consequences of the proposal are presented on page 100.

Because the GMP proposes to maintain, enhance, and where possible, restore marine resources and to control run-off and other impacts to the marine environment, it is consistent with the marine environment provisions of the California Coastal Resources Planning and Management Policies.

ARTICLE 5, LAND RESOURCES

The NPS proposes to "preserve, restore, and protect native vegetation within the monument and the adjacent Point Loma Ecological Reserve through the use of specific management strategies." (p. 17) Strategies are described on page 21 under the No Action Alternative, which describes the baseline NPS approach to vegetation and habitat management, and also on page 22 for the Proposal. Vegetation communities and habitat are described on pages 84-89 and the environmental consequences of the proposal are presented on pages 100-102. Because the GMP proposes to protect habitat values and to prevent impacts which would degrade sensitive habitat areas, it is consistent with the land resources provisions of the California Coastal Resources Planning and Management Policies.

ARTICLE 6, DEVELOPMENT

Views to, from, and within the monument are critical concerns of the NIPS. The 1992 visitor use survey indicates that the majority of visitors come to Cabrillo National Monument to enjoy the views (P. 91). Concern for views from the monument was a part of all alternatives for management (p. 17). Views from the monument cause the NPS concern for adjacent development such as expansion of the Point Loma Wastewater Treatment Plant to the northwest (p. 27). The NPS is equally concerned about views to the monument from the tidepool area and all surrounding waters.

The GMP proposes several developments: relocation of the entrance station, addition of an administration building and storage building, changes to the lighthouse landscape and addition of a lighthouse interpretation building, a new whale overlook structure, improvements to the Ballast View rest area, extension of the Bayside Trail to form a loop, and conversion of the

Navy Marine Science facility to an intertidal interpretive center. These proposed developments are described on pages 28-48. The environmental consequences of these developments are discussed on pages 101 -104. All development is proposed to be aesthetically compatible with the design themes of the visitor center complex.

Except for the intertidal interpretive center, which cannot be evaluated at this time, the only developments within the view of the shoreline are the new whale overlook structure and the Bayside Trail loop extension. The low profile of the design option selected for the whale overlook and the provision to set it below the crest of the hill are expected to reduce the visual impact to the views from the tidepool area. The Bayside Trail loop extension is designed as a narrow trail to accommodate single-file walking in order to reduce any effects on the native habitat and on the views. The trail itself will provide increased views of San Diego Bay.

Because the GMP considers and protects, to the degree possible, the scenic and visual qualities of the coastal area, it is consistent with the development provisions of the California Coastal Resources Planning and Management Policies.

ARTICLE 7, INDUSTRIAL DEVELOPMENT

This article does not apply to Cabrillo National Monument.